



# Environmental and Social Diligence

Kano Maradi Project

PREPARED FOR



Africa Finance Corporation

DATE

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SIGNATURE PAGE

# Environmental and Social Due Diligence Assessment

Kano – Maradi Project  
0726668



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## CONTENTS

EXECUTIVE SUMMARY	1
1. INTRODUCTION	6
1.1 BACKGROUND	6
1.2 OBJECTIVES OF THE ASSESSMENT	6
1.3 ASSESSMENT METHODOLOGY	7
1.3.1 Site visit and interviews	7
1.3.2 Document Review	11
1.3.3 Assessment and Reporting	12
1.4 MATERIALITY OF THE FINDINGS	12
2. PROJECT DESCRIPTION	14
3. CLIMATE CHANGE RISK REVIEW	<b>ERROR! BOOKMARK NOT DEFINED.</b>
3.1 INTRODUCTION	<b>ERROR! BOOKMARK NOT DEFINED.</b>
3.2 APPROACH	<b>ERROR! BOOKMARK NOT DEFINED.</b>
3.3 LIMITATIONS	<b>ERROR! BOOKMARK NOT DEFINED.</b>
3.4 CLIMATE SCREENING	<b>ERROR! BOOKMARK NOT DEFINED.</b>
3.4.1 Nigeria	<b>Error! Bookmark not defined.</b>
3.4.2 Niger	<b>Error! Bookmark not defined.</b>
3.5 FUTURE CLIMATE PROJECTIONS	<b>ERROR! BOOKMARK NOT DEFINED.</b>
3.6 PHYSICAL RISK REVIEW AND MITIGATIONS	<b>ERROR! BOOKMARK NOT DEFINED.</b>
3.6.1 Risk Review	<b>Error! Bookmark not defined.</b>
3.6.2 Construction phase	<b>Error! Bookmark not defined.</b>
3.6.3 Operational phase	<b>Error! Bookmark not defined.</b>
3.6.4 Mitigations	<b>Error! Bookmark not defined.</b>
4. ASSESSMENT FRAMEWORK	16
5. ASSESSMENT FINDINGS	18
5.1 ENVIRONMENTAL RISK CATEGORISATION	18
5.2 IFC PS ASSESSMENT FINDINGS,	19
5.2.1 IFC PS1 – Assessment and management of environmental and social risks and impacts	19
AfDB OS 1, Environmental and Social Assessment	19
5.2.2 IFC PS2 – Labour and working conditions	36
AfDB OS 2 (OS2): Labour and Working Conditions	36
5.2.3 IFC PS3 – Resource efficiency and pollution	45
AFDB OS 3 (OS3): Resource Efficiency and Pollution Prevention and Management	45
5.2.4 IFC PS4 – Community health, safety and security	49
AfDB OS 4 (OS4): Community Health, Safety and Security	49
5.2.5 IFC PS5 – Land ACQUISITION and involuntary resettlement	53
AfDB OS 5 (OS5): Land Acquisition, Restrictions on Access to Land and Land use, and Involuntary Resettlement	53
5.2.6 IFC PS6 – Biodiversity conservation and sustainable management of living natural resources;	60
AFDB OS 6 (OS6): Habitat and Biodiversity Conservation and Sustainable Management of Living Natural Resources	60

5.2.7	IFC PS7 – Indigenous people	69
	AfDB (OS7): Vulnerable Groups	69
5.2.8	IFC PS8 – Cultural heritage	70
	AfDB (OS8): Cultural HeritagE	70

## 6. ENVIRONMENTAL AND SOCIAL ACTION PLAN 71

APPENDIX A MOTA ENGIL ORGANOGRAM

APPENDIX B PROTECTED AREA REGISTER

APPENDIX C VDR DOCUMENT LIST

APPENDIX D SITE PHOTOGRAPHS

APPENDIX E ATTENDANCE LOG

## 7. REFERENCES 1

### LIST OF TABLES

TABLE 1-1	KEY PERSONNEL INTERVIEWS	7
TABLE 1-3	DEFINITION OF GAP RISK LEVEL	12
TABLE 3-1	BASELINE WATER RISK DATA	<b>ERROR! BOOKMARK NOT DEFINED.</b>
TABLE 3-2	PROJECTED WATER STRESS	<b>ERROR! BOOKMARK NOT DEFINED.</b>
TABLE 6-1	ENVIRONMENTAL AND SOCIAL ACTION PLAN	72

### LIST OF FIGURES

FIGURE 2-1	PROPOSED RAILWAY ALIGNMENT (SOURCE: MOTA-ENGIL NIGERIA – PROJECT ENVIRONMENTAL PLAN)	15
FIGURE 2-2:	COUNTRY BORDER VIEW - KANO-MARADI RAIL ALIGNMENT (SOURCE GOOGLE EARTH, MOTA ENGIL 2024)	15

## Acronyms and ABBREVIATIONS

<b>Acronyms</b>	<b>Description</b>
AFC	Africa Finance Corporation
BMP	Biodiversity Management Plan
CCRA	Climate Change Risk Assessment
CEFO	Local Security Organisation
CGM	Company-Community Grievance Mechanism
CH	Critical Habitat
CLO	Community Liason Officer
CPEP	Construction Project Environmental Plan
CPFESP	Construction Phase Framework Environmental and Social Plan
EHS	Environment, Health and Safety
EHSQ	Environment, Health, Safety and Quality
EIA	Environmental Impact Assessment
EMS	Environmental Management Systems
EP4	Equator Principles 4
EPP	Emergency and Preparedness Plan
ERM	Environmental Resources Management
ESAP	Environmental and Social Action Plan
E&S	Environment and Social
ESDD	Environmental and Social Due Diligence
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
FM	Frequency Modulation
FMEnv	Federal Ministry of Environment
FMoT	Federal Ministry of Transport
GBV	Gender-Based Violence
GIIP	Good International Industry Practice
GRM	Grievance Management Procedure
GRI	Global Reporting Initiative
HIV	Human Immunodeficiency Virus
HR	Human Resources
H&S	Health and Safety

<b>Acronyms</b>	<b>Description</b>
IBAT	Integrated Biodiversity Assessment Tool
IED	Improvised Explosive Device
IFC	International Finance Corporation
IMM	Impact Mitigation Monitoring
IMS	Integrated Management Systems
ISO	International Organisation of Standardisation
IUCN	International Union of Conservation of Nature
LRP	Livelihood Restoration Plan
LTI	Lost Time Injury
MEECA	Mota-Engil Engenharia E Construção África
MIA	Market Internal Audit
NTA	Nigerian Television Authority
OHSMS	Occupational, Health and Safety Management Systems
PAC	Project-Affected Communities
PAP	Project-Affected Persons
PPE	Personal Protective Equipment
PPS	Performance Standard
QMS	Quality Management Systems
RAP	Resettlement Action Plan
RoW	Right of Way
SCSP	Social & Community Sustainability Plan
SEP	Stakeholder Engagement Plan
SHEQ	Safety, Health, Environment and Quality
TCFD	Taskforce for Climate-related Financial Disclosures
VPSHR	Voluntary Principles on Security and Human Rights
WMP	Waste Management Plan

## EXECUTIVE SUMMARY

Environmental Resources Management (ERM) and EnvAccord Limited (EnvAccord) were appointed by Africa Finance Corporation (AFC) and its lenders to undertake an independent Environmental and Social Due Diligence (ESDD) assessment ('the Assessment') of a proposed dual gauge – passenger and freight railway line from Kano to Maradi which spans approximately 284km and is intended to improve transportation infrastructure between Nigeria and Niger. The Project is being developed and constructed by Mota-Engil Engenharia E Construção África (MEECA), based in Nigeria ("the Contractor"). It is noted that no work or E&S studies have commenced on the Niger side of the project, due to continued closed borders, restricting access to the rail alignment. This report therefore covers the E&S studies that have been conducted on the Nigerian portion of the project only.

The Assessment was carried out under the framework of the IFC Performance Standards on Environmental and Social Sustainability (2012) (the Performance Standards), the World Bank's 2016 Environmental, Health and Safety (EHS) guidelines, the Equator Principles 4 (EP4) (2020) and the African Development Banks Environmental and Social Safeguards (2023).

The specific objectives of the assessment are outlined as follows:

- Assess the nature and structure of the Company's E&S Management System and its comparison to international best practice to test fitness for purpose;
- Review of Company EHS performance;
- Assessment of the Company's sustainability ambition/s;
- Determine the current state of compliance with any permits, and reasonably foreseeable legislation (i.e., within the next 12 month) on a country-wide basis;
- Investigate the possibility for contingent liabilities such as negative social impacts, and
- Assess capability / capacity of E&S staffing.

A site visit was conducted by EnvAccord consultants Mr Pius Adejoh (social) and Mr Charles Ogbezuode (environmental). The site visit involved driving along the route alignment and visiting nearby affected communities during the period of 11 to 22 March 2024 by the respective consultants. In addition to the site visit, a series of interviews were held with Project-Affected Persons (PAPs).

In ERM's opinion, this Project is currently a **Category A investment**, in line with IFCs E&S risk categorisation and EP4 based on the below justification:

- The Project involves involuntary displacement and resettlement of communities along the railway route. However, these impacts are expected to be limited and can be addressed through appropriate social safeguards and mitigation measures.
- The project may pose health and safety risks during the construction and operation phases. However, these risks can be mitigated through implementation, training and adherence to in-country safety regulations and industry best practice.
- The project is expected to have environmental impacts such as land disturbance and potential disruption of natural habitats due to its linear nature.



**Overall ERM did not identify any red flags or critical risk rated findings that deem the project unsuitable for investment. ERM has not identified any findings that would require rectification as a Condition Precedent (CP), however some High-risk findings should be rectified as a matter of urgency.** Please refer to the summary list below for all the High-risk issues identified on the Project. For detailed findings refer to Section 4 and for suggested mitigation measure to be implemented by the project, refer to the Environmental and Social Action Plan (ESAP).

## SUMMARY OF HIGH RISK FINDINGS:

### PS1 – MANAGEMENT SYSTEMS

1. The Contractor is yet to receive EIA approval for the sections within the Republic of Niger. To date, the draft EIA report (18 May 2022) for Niger has been submitted to the government regulator for review; however, the regulator has indicated via a letter dated 24 May 2022, a preference for joint review and evaluation of the EIA and RAP by both government entities (Nigeria and Niger). The RAP is yet to be completed. The Contractor indicated that all work is currently halted on the Niger side, until the borders can be reopened. Although the Contractor indicated that the Border might reopen soon, there is no definitive information on when this may happen.
2. The Contractor has developed an Environmental and Social Management Plan (ESMP) as part of the Nigeria ESIA and additionally has a group level ISO 14001 certified system as their Environmental and Social Management System (ESMS), which is broadly aligned to the IFC PS requirements. The ESMP/ESMS is poorly implemented on site. Many of the included plans and procedures could not be validated due to low and inconsistent implementation practises. For example, periodic environmental compliance monitoring has yet to commence, whereas some aspects of biodiversity management are being implemented. No clear roles and responsibilities have been included for the implementation and it is not know if the Contractor has sufficient human resources to implement the current plans along the alignment section, as outlined in the ESMP/ESMS.
3. The Contractor has appointed Allot Nigeria Limited, as the E&S consultant to support with the implementation of the ESMP, however the implementation is yet to commence.
4. The majority of the EIA approval conditions in the ESMP are yet to be actioned and implemented through formal plans and procedures. A systematic procedure or action plan for addressing the conditions for EIA approval is not in place.

### PS2 – LABOUR AND WORKING CONDITIONS

1. All the employees receive an offer letter before their appointment, and within 3 months, they receive their employment contracts for signature, in accordance with Nigerian Labour Law.
2. The Contractor confirmed that the Project staff work 45 normal hours per week, between Monday to Saturday (8 hours per day from Monday to Friday plus 5 hours Saturday morning). However, in order to comply with the deadline of the project imposed by the Client, the Project team needs to work overtime, that is fully paid to all the Employees, and is not mandatory. The Employees may opt out of working overtime if they are not available. Workers are required to work for four Saturdays and two Sundays monthly. The Contractor outlines conditions for dismissal/ termination of employees in their contract

letters (often due to misconduct). The termination letters refer to the employment Contract. Workers are terminated in accordance with the Nigerian Labour Law requirements. To date, there have not been any collective dismissals or retrenchment in any area of the project. The Contractor is actively recruiting and when works have ceased, they provide training and reconvert the worker to another position or area within the Project. Additional information provided by the Contractor post-assessment indicated that it has put in place a policy on retrenchment, which will be shared with the Consultants for review of adequacy and alignment with performance standards requirements.

3. 3. A corporate level Gender Based Violence (GBV) policy exists and includes clear lines of reporting. According to management, anyone can report any situation to any of the managers of the Project, through the DHC of the Project (Joao Elias) or the DHC of the Market (Sandra Bento) or through the Ethic internal email. This information is referred to during the onboarding process for all employees. Interactions with staff at the camp site indicated that some employees were not sure about the reporting line. It was further found that a sexual harassment incident occurred between a sub-contractor and a staff member. Feedback from the Contractor indicated that measures are being taken to increase awareness about GBV and reporting procedures, and to ensure that sub-contractors provide mandatory sexual harassment training for their employees. Prior to engaging with the project, a suite of medical tests is conducted on applicants. Although interviews with the staff of the Contractor's Medical Unit indicated that HIV-positive applicants were excluded during recruitment, feedback from the Contractor revealed that the medical exams conducted during the admission process are the ones defined by the internal protocol of the Mota-Engil Group and do not include HIV/AIDS tests. The HR department does not see medical results, since they are kept confidential; however, they can see whether a potential employee is fit for work or not, based on their medical records. Despite this, the Contractor has taken steps to outsource the Medical Unit to a new sub-contractor with a clear mandate to adopt international best practices.

The National Union of Civil Engineering Construction, Furniture and Wood Workers is the only union that approached the Contractor. Their members have visited the project to meet Mota Engil Employees. As of March 2024, HR did not have any records of employees affiliated with this or other Unions. However, the Contractor has reported ongoing discussions with the Union, which they hope may lead to the establishment of a local branch upon conclusion. Timelines for completion of actions are yet to be provided and should be verified in follow-on monitoring assessments.

### PS3 – RESOURCE EFFICIENCY

1. No High-risk findings were made in this regard.

### PS4 – COMMUNITY HEALTH AND SAFETY

1. Whilst the Emergency Preparedness and Response plan covers emergencies such as medical emergency, fire emergency, environmental emergency, evacuation, incidents, accidents and hazards, it is unclear how the plan addresses the Project's response to emergencies that could affect the communities. It also does not include disclosure of appropriate information to affected communities, relevant government agencies and other relevant parties. According to the Contractor, this topic will be handled and improved through the relevant committees (Resettlement Steering Committee (RSC),

Resettlement Management Committee (RMC), and Community Resettlement Committee (CRC)), which will be developed.

## PS5 – LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

1. Compensation rates for loss of structures, crops, and trees is based on government rates with no adjustment for inflation or the provisions of the Land Use Act. This has resulted in a significant number of aggrieved persons. Furthermore, some PAPA's compensation was paid to wrong individuals which reflects potentially unlawful behaviour in the process.
2. Loss of access to land is not addressed in the RAP/LRP documents, as these are developed to comply with the Land Use Act of Nigeria, which advocates for payment of compensation for improvements on the land and standing trees and crops. In addition, no considerations have been made towards replacement of for vulnerable persons and households, nor is the percentage of land lost to the project by a household considered in relation to payable compensation. According to the Contractor, this will be addressed in the Supplemental RAP review. The "Transitional allowance for vulnerable households" is considered in the Livelihood Restoration and Improvement Budget of the Supplemental RAP but is not in line with IFC PS requirements in terms of compensation.
3. Squatters and other persons with no formal land rights are not eligible for compensation, which is a misalignment with IFC requirements. Communal resources with customary rights are also not eligible for compensation. According to the Contractor, this aspect will be reviewed in the next Supplemental RAP update.

## PS6 – BIODIVERSITY

1. Not enough information was available on habitat preferences or appropriate monitoring actions for the only potential critical habitat triggering species, being the African Spurred Tortoise (*Centrochelys sulcata*), and hence no net-loss or net-gain measures can be efficiently specified nor measured.
2. No clear habitat sensitivity maps were provided (other than mapping forest reserves), as required under the IFC PS, which impedes the efficiency of assessing biodiversity protection and monitoring measures.
3. Without more detailed information on actual species composition and species to be used for rehabilitation and no-net-loss activities, the efficiency of conservation actions over time cannot be verified, especially in forest reserves.
4. As indicated under PS6-01, some forest reserves are likely to be seasonal wetlands, and this is superficially addressed in the ESIA, but it has not been adequately investigated and may lead to insufficient drainage being installed. This may potentially lead to further loss of protected areas ecosystem stability or where already modified to croplands, ecosystem productivity.

## PS7 – INDIGENOUS PEOPLES

Not triggered

## PS8 – CULTURAL HERITAGE

1. A chance find procedure and cultural management plan is in place. Chance finds to date have largely been graves. Where there is a need for graves to be moved, this is done in collaboration with traditional and religious leaders and the relatives, if the latter can be determined.

# 1. INTRODUCTION

## 1.1 BACKGROUND

Environmental Resources Management (ERM) and Environmental Accord Limited (EnvAccord) were appointed by Africa Finance Corporation (AFC) to undertake an independent Environmental and Social Due Diligence (ESDD) assessment ('the Assessment') of the proposed dual gauge – passenger and freight railway line from Kano to Maradi which spans approximately 284km and is intended to improve transportation infrastructure between Nigeria and Niger ("The Project"). The Project is being developed and constructed by Mota-Engil Engenharia E Construção África (MEECA), based in Nigeria ("the Contractor") who is acting in the role Engineering, Procurement and Construction (EPC) company.

In addition to the main line to Maradi, there is a proposed branch line from Kano to Dutse, covering approximately 102km. This branch line would serve as a crucial link connecting Kano, a major commercial hub in Nigeria, to Dutse, the capital of Jiwaga State.

The assessment was carried out with respect to the requirements of the applicable National laws in Nigeria and Niger, and international standards most notably the International Finance Corporation (IFC) Performance Standards on Environmental and Social Sustainability (collectively referred to as the Performance Framework). A rapid assessment involving ground-truthing of the Niger section was conducted as part of the ESDD. In addition, high-resolution satellite imagery of the RoW was acquired to further understand physical baseline conditions. Project construction activities are yet to commence in the Niger section, pending completion of the RAP and approval of the EIA for this section. The EIA for this section has been completed and the draft report submitted to the Niger regulators for approval; however, the RAP is pending due to the political crisis in the country. The Government of Niger noted that they will be responsible for providing an unencumbered RoW for the project.

## 1.2 OBJECTIVES OF THE ASSESSMENT

The objectives of the Assessment were to conduct an independent determination of material environmental and social aspects within the applicable regulatory and performance framework. The Assessment involved desktop-based document review and site visits including interviews with site management, workers and sub-contractors' staff, Project-Affected Persons (PAPs) and local community members. The specific objectives are outlined as follows:

- Assess the nature and structure of the Company's E&S Management System and its comparison to international best practice to test fitness for purpose;
- Review of Company environmental, health and safety (EHS) performance;
- Assessment of the Company's sustainability ambition/s;
- Determine the current state of compliance with any permits, and reasonably foreseeable legislation (i.e., within the next 12 month) on a country-wide basis;
- Investigate the possibility for contingent liabilities such as negative social impacts; and
- Assess capability / capacity of E&S staffing.

## 1.3 ASSESSMENT METHODOLOGY

### 1.3.1 SITE VISIT AND INTERVIEWS

The site visit, covering sections within Nigeria, was conducted by EnvAccord consultants; Mr Pius Adejoh and Mr Raphael Lasabi (social), and Mr Charles Ogbezuode (environmental). The site visit involved driving along the route alignment and visiting nearby affected communities during the period of 11 to 22 March 2024 by the respective consultants. In addition to the site visit, a series of interviews were held with Project-Affected Persons (PAPs). Key personnel interviewed are summarised in Table 1-1. The site visit, covering sections within Niger, was conducted by EnvAccord's subcontractors; Mr. Abdourhamane Hamidou (environmental) and Mr Soga Mourtala (social). Similarly, the visit involved physical observation along the route alignment and visiting nearby affected communities between 20 to 22 March 2024. No formal interviews were held with PAPs within the Niger section.

**TABLE 1-1 KEY PERSONNEL INTERVIEWS**

Date	Location	Participants	Method of Engagement	Discussion Topics
13/03/2024	Project Manager's Office, Kazaure Camp Site	<u>Contractor:</u> Louis Suzano (Project Manager)  <u>Sub-contractor:</u> Abubakar Marafa (Allot representative)  <u>Lender Group:</u> Florentina Tchioffo (E&S Officer) Bassey Ibodinma (E&S Officer)  <u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi	In-depth interview	Status of work at the various sections; Emergency plan; Staff accommodation, Dams; relationship and monitoring of sub-contractors in the context of ESMP compliance, staff recruitment & welfare, GRM
11/03/2024	Human Resource Department, Kazaure Camp Site	<u>Contractor:</u> (Human Resources Representative) Ummul-Khair Bala (Human Resources Technician) Abubakar Makama (Community Liaison Officer) Ismail Jamilu (Environmental Officer)	In-depth Interview	Overview of Contractor; staff strength and composition; HR policy; Recruitment procedure; working conditions and terms of employment; workers accommodation and transportation; Number of & relationship with and monitoring sub-Contractors' compliance with relevant labour laws; Existence and freedom to join Workers union; Collective

Date	Location	Participants	Method of Engagement	Discussion Topics
		<u>Sub-contractor:</u> Abubakar Marafa (Allot representative)  <u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi		bargaining principle; Policy on GBV; Internal GRM; 2 X Challenge
11/03/2024	Health Clinic, Kazaure Camp Site	<u>Contractor:</u> Nimatullahi Bashir (Medical Doctor) Garlos Cossa (Medical Doctor) Ibrahim Abubakar (SHEQ) Asse Ahsenti (SHEQ)  <u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi	In-depth Interview	Staff strength at the clinic; Hours of service; common ailments; infectious diseases; availability of drugs; existence of HMO; Accidents; incidents within the camp site; medical checkups; first aids
12/03/2024	Bristol Palace Hotel, Kano State	<u>Contractor :</u> Luis Marcelino (Environment and Social Manager)  <u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi	In-depth Interview	Background/certification; staff strength in the Unit; availability and compliance with PPE; occupational incidents/accidents; emergency response unit; safety of working environment; safety of third-party practices and supply chain employees; community health and safety, community exposure to disease; dust control
14/03/2024	Conference Room, Kazaure Camp Site	<u>Contractor:</u> Luise Antones (Health and Safety Manager) Benet Size (Health and Safety Co-ordinator) Luis Marcelino (E&S Manager)  <u>Lender Group:</u> Florentina Tchioffo (E&S Officer) Basse Uzodinma (E&S Officer)	In-depth Interview	Competence of the health and safety staff, Availability of health and Safety policies, Level of awareness of the workers of the policies, Incidents, accident, near misses reporting, investigation and mitigation; staff training

Date	Location	Participants	Method of Engagement	Discussion Topics
		Health and Safety Coordinator  <u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi		
11/03/2024	Security Department, Kazaure Camp Site	<u>Contractor:</u> Vitor Leits (Security Manager) Pedro Silvid (Deputy Security Manager)  <u>Security Sub-Contractor:</u> Jean-Paul Peaquin (GardaWorld Security Manager)  <u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi	In-depth Interview	Security, experience of security personnel, Security risk assessments, drills and training; availability and relations with security sub-contractors, monitoring activities to ensure safety of personnel on site, human rights issues, level of compliance with international standards, security issues within the camp site, existence and management of security Issue from the community members
15/03/2024	Conference Room, Kazaure Camp Site	Nuno Bento (Camp Site Manager) Abubakar Makama (CLO) Abdulwahab Usman (Community Liaison Coordinator)  <u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi	In-depth Interview	Types and locations of accommodation; assessment of local housing market, beneficiaries, compliance with national and local housing standards; general living facilities, medical facilities, leisure and social facilities, workers' accommodation management
15/03/2024	Conference Room, Kazaure Camp Site	<u>Contractor:</u> Abubakar Makama (CLO) Abdulwahab Usman (CLC)  <u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi	In-depth Interview	Land acquisition, asset enumeration and valuation, compensation processes; consultations, disclosures, grievances, grievances procedures, livelihood restoration
15/03/2024	Admin Office within the Filling Station, Kazaure Camp Site	Sub-contractor in charge of Diesel Supply	In-depth Interview	Awareness about the health and safety Policy of the Contractor, relationship with the Contractor and adherence to their policies, compliance with the labour policies of the contractor, level



Date	Location	Participants	Method of Engagement	Discussion Topics
		<u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi		of compliance with international standards, availability of emergency preparedness, workers welfare
13/03/2024	Administrative Building Kazaure Camp Site	<u>Contractor:</u> Female staff (See Appendix)  <u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi	Focus Group Discussion	Recruitment, employment status, workers' welfare, accommodation, transportation, availability of workers union, collective bargaining, pension, working hours, awareness about grievance complaint procedures, retrenchment activities, employment benefits, trainings received, incidence reporting, discrimination, GBV and forced, migrant and underage workers
13/03/2024	Kazaure Camp Site	<u>Contractor:</u> Male staff (see Appendix)  <u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi	Focus Group Discussion	Recruitment, employment status, workers' welfare, accommodation, transportation, availability of workers union, collective bargaining, pension, working hours, awareness about grievance complaint procedures, retrenchment activities, employment benefits, trainings received, incidence reporting, discrimination, GBV and forced, migrant and underage workers
15/03/2024	Hugungumai, Kunchi Quarry, Kano State	Community Leaders, members and PAPs within Makolowa, Hugugumai, M. Danjaka and Makawurechi, Communities.	Focus Group Discussion	Perception of the project, project impact on the communities, displacement and compensation issues, level of awareness about the grievance mechanism process, community needs, level of awareness and participation in the process of land acquisition and compensation, support for vulnerable, availability of livelihood restoration
12/03/2024	Ungwar Dinya, Roni LGA, Jigawa State	Community leaders, members and PAPs within Ungwar	Focus Group Discussion	Perception of the project, project impact on the communities, displacement and compensation issues, level of

Date	Location	Participants	Method of Engagement	Discussion Topics
		Dunya Community, Jigawa State.		awareness about the grievance mechanism process, community needs, level of awareness and participation in the process of land acquisition and compensation, support for vulnerable, availability of livelihood restoration and community challenges
14/03/2024	Jiba Community, Sandanmu LGA, Katsina State	Community Leaders, members and PAPs within Jiba and Sabongair Community, Katsina State.	Focus Group Discussion	Perception of the project, project impact on the communities, displacement and compensation issues, level of awareness about the grievance mechanism process, community needs, level of awareness and participation in the process of land acquisition and compensation, support for vulnerable, availability of livelihood restoration, security issues and disturbance to grazing routes.
12/03/2024	Kazaure Emir's Palace, Jigawa State	Elder at Kazaure Community, Jigawa State	Focus Group Discussion	Perception of the project, project impact on the communities, emanating project issues, level of awareness about the grievance mechanism process and community needs.
13/03/2024	Ministry of Environment, Katsina State	Commissioners of the Ministry of Environment and Ministry of Lands and surveys; representatives of the Ministry	Consultation	Land acquisition, and evaluation process, cultural heritage as well as on the possible forest reserves that might be affected.

### 1.3.2 DOCUMENT REVIEW

Relevant environmental, social, health and safety documents and information were requested from the Contractor and reviewed. This included documentation related to the construction and operation phases of the Project.

A full list of the provided documentation is contained in Appendix B. It is noted that at the time of submission of this Draft report, various documents were still being uploaded into the VDR, in response to ERM's request for information, which could not form part of this review.

### 1.3.3 ASSESSMENT AND REPORTING

Following the documentation review, the Project's E&S standards, policies, procedures and performance (as determined through document review) were assessed in relation to relevant E&S performance standards to determine compliance and to identify gaps. Where gaps have been identified, a corrective action plan has been developed and timings recommended in consideration of various aspects of the risk.

The findings of the report are reported in the following sections:

- Section 2 provides a high-level overview of the Project;
- Section 3 provides a high-level climate change risk assessment of the Project;
- Section 4 provides an overview of the assessment framework;
- Section 5 provides an overview of the Project and associated environmental and social setting; and
- Section 6 summarises the results of the assessment in the form of an Environmental and Social Action Plan (ESAP).

The following appendices are included as supporting material to the report:

- Appendix A E&S Organogram
- Appendix B Protected Area Register
- Appendix C Document List
- Appendix D Site Photographs

## 1.4 MATERIALITY OF THE FINDINGS

Each of the identified gaps are ranked in categories of Low, Moderate, High and Critical to indicate their respective significance. Definitions for such categories are provided in Table 1-2.

**TABLE 1-2 DEFINITION OF GAP RISK LEVEL**

Gap Level	Definition
<b>Low</b>	<p>A low gap is where the environmental or social aspect can be easily addressed by the Project through clarifications, minor edits, and a limited amount of additional work.</p> <p>There is already a good understanding of the topic based on the information gathered during the assessment of the associated risks and impacts.</p> <p>The gap is not expected to hinder international lenders support from an environmental and social point of view.</p>

Gap Level	Definition
<b>Moderate</b>	<p>A medium gap is where the environmental and social aspect could cause a challenge to the project development, assessments, and permit / licence application and / or meeting international requirements.</p> <p>Medium gaps are generally those where there is an incomplete understanding of some environmental and/or social features and related impacts and which require the Project to undertake additional activities and work to provide information that can be acceptable according to international standards. However, this extra work is expected to be achievable within a reasonable chronological and financial frame.</p> <p>Once the gap is addressed, it will be no longer expected to hinder international lenders support from an environmental and social point of view.</p>
<b>High</b>	<p>A high gap is where the Project does not meet the requirements of the applicable environmental and social international standards. Additional studies and substantial work are required to address the gap.</p> <p>High gaps are generally those where there is a significant lack of E&amp;S documentation and which the Project would find it difficult / very challenging to address to comply with international standards.</p>
<b>Critical</b>	<p>A critical gap is a potential fatal flaw item for which it is estimated that the Project cannot or will be extremely challenging to align to applicable international lender standards, based on the existing Project design.</p> <p>Only possible options to align with such standards are considered to require significant Project design changes (other location, layout modification).</p>

## 2. PROJECT DESCRIPTION

Mota-Engil Engenharia e Construcao Africa was appointed by the Federal Ministry of Transportation of Nigeria (FMoT) to design and construct a 393 km single-track, standard-gauge railway line (referred to as the Main line) encompassing a total of 14 stations. This line will link Kano in Northern Nigeria to Maradi in the southern region of the Republic of Niger (Figure 2-1& Figure 2-2).

Additionally, the project entails the development of a 108 km Branch Line, inclusive of five stations, to connect the main railway line with the capital city of Jigawa State, Dutse. The Main line, stretching across 393 km, will connect three federal states within Nigeria—Kano, Jigawa, and Katsina—as well as connect with the Republic of Niger via Maradi. Simultaneously, the 108 km Branch Line will establish a link between Dutse and Kano in Nigeria.

The route of the Kano to Maradi railway line initiates in Nigeria, commencing from Kano and passing through various towns including Dawanau, Kunya, Dambatta, Kazaure, Durbe, Daura, Shargalle, Mashi, Maduru, Katsina, Daddara, Jibia, and eventually reaching Maradi in the Republic of Niger.

The Contractor outlined the following as primary construction activities for the project:

- Survey and Design;
- Clearing and Grubbing;
- Excavation, Embankment and Pavement Layers;
- Roadworks;
- Bridgeworks;
- Overbridges;
- Culverts, Underpasses and Retaining Walls;
- Stations;
- Telecommunication (P.S.);
- Signalling (P.S.);
- Power supply (P.S.); and
- General Provisional Items (P.S).

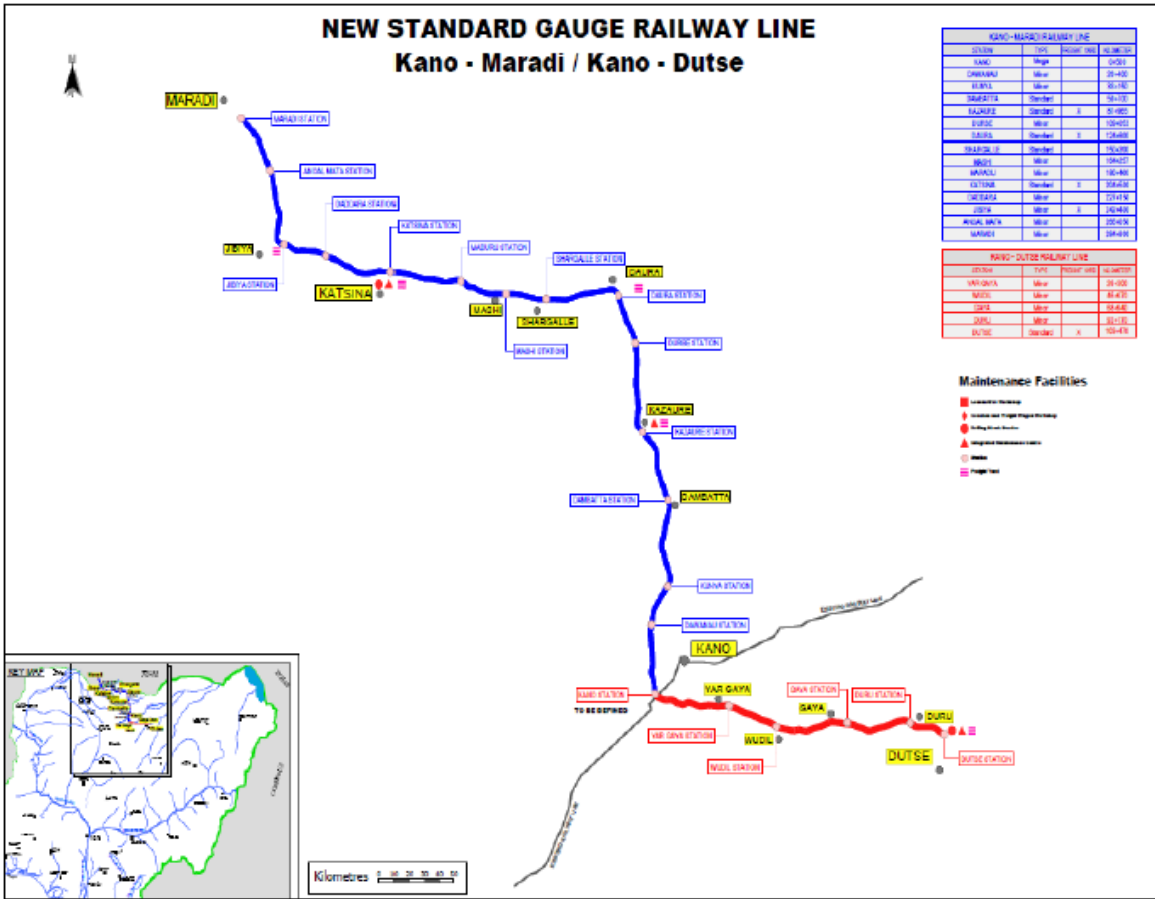


FIGURE 2-1 PROPOSED RAILWAY ALIGNMENT (SOURCE: MOTA-ENGIL NIGERIA – PROJECT ENVIRONMENTAL PLAN)

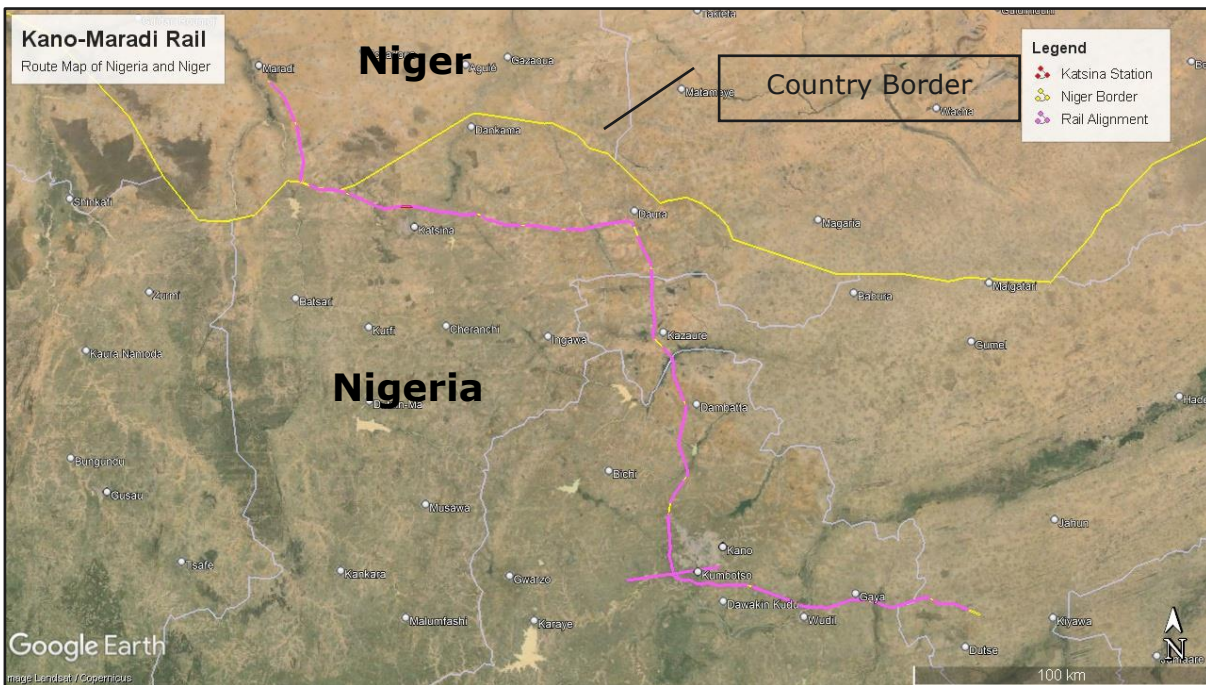


FIGURE 2-2: COUNTRY BORDER VIEW - KANO-MARADI RAIL ALIGNMENT (SOURCE GOOGLE EARTH, MOTA ENGIL 2024)

### 3. ASSESSMENT FRAMEWORK

The Assessment was carried out under the framework of the IFC Performance Standards on Environmental and Social Sustainability (January 2012) (the Performance Standards (PS)), World Bank (WB) Environmental Health and Safety Guidelines (2016), Equator Principles 4 (EP4) (2020) and the African Development Bank Operational Safeguards (2023).

Based on a review of the Project during the construction and operation phases, the following standards were determined to be applicable:

#### **Legal Framework:**

- Local, Provincial and National laws and regulations of Nigeria and the Republic of Niger.

#### **IFC Performance Standards (2012):**

- Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts;
- Performance Standard 2: Labour and Working Conditions;
- Performance Standard 3: Resource Efficiency and Pollution Prevention;
- Performance Standard 4: Community Health, Safety, and Security;
- Performance Standard 5: Land Acquisition and Involuntary Resettlement;
- Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- Performance Standard 7: Indigenous Peoples (not applicable); and
- Performance Standard 8: Cultural Heritage.

#### **Equator Principles 4 (2020):**

- Principle 1: Review and Categorisation;
- Principle 2: Environmental and Social Assessment;
- Principle 3: Applicable Environmental and Social Standards;
- Principle 4: Environmental and Social Management System and Equator Principles Action Plan;
- Principle 5: Stakeholder Engagement; and
- Principle 6: Grievance Mechanism.

The following EP requirements are the responsibility of the lender to implement, and do not form part of this assessment:

- Principle 7: Independent Review;
- Principle 8: Covenants;
- Principle 9: Independent Monitoring and Reporting; and
- Principle 10: Reporting and Transparency.



**African Development Bank Environmental and Social Safeguard (2023):**

- E&S OS 1 (OS1): Assessment and Management of Environmental and Social Risks and Impacts;
- E&S OS 2 (OS2): Labour and Working Conditions;
- E&S OS 3 (OS3): Resource Efficiency and Pollution Prevention and Management;
- E&S OS 4 (OS4): Community Health, Safety and Security;
- E&S OS 5 (OS5): Land Acquisition, Restrictions on Access to Land and Land use, and Involuntary Resettlement;
- E&S OS 6 (OS6): Habitat and Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- E&S Operational Safeguard 7 (OS7): Vulnerable Groups;
- E&S Operational Safeguard 8 (OS8): Cultural Heritage;
- E&S Operational Safeguard 9 (OS9): financial Intermediaries – not applicable; and
- E&S Operational Safeguard 10 (OS10): Stakeholder Engagement and Information Disclosure.

*Due to the close alignment with the IFC PS, these have been evaluated collectively (using the IFC PS system) in Section 5.*



## 4. ASSESSMENT FINDINGS

### 4.1 ENVIRONMENTAL RISK CATEGORISATION

As part of the review of the E&S risks and impacts of a proposed Project or Company, the IFC and EP4 uses a process of categorisation to reflect the magnitude of risks and impacts. The following general descriptions apply to categorising a potential project or company according to their E&S risks and impacts:

- **Category A:** Project/Company activities are likely to have significant adverse environmental, social or health and safety impacts that are diverse or unprecedented. An impact is considered "significant" if it is irreversible (e.g., leads to loss of a major natural habitat), affects vulnerable groups or ethnic minorities, poses major risks of injury or to health, involves involuntary displacement and resettlement, or affects important cultural heritage sites.
- **Category B:** Project/Company activities may result in specific environmental, social or health and safety impacts, but these impacts are site specific and few if any of them are irreversible. In most cases mitigation measures are predetermined in the IFC PS, EHS Guidelines or design criteria. Potential adverse impacts on human populations or environmentally, socially or culturally important areas are less adverse than those of Category A.
- **Category C:** Project/Company activities have minimal or no adverse environmental, social or health and safety impacts.

In ERM's opinion, this Project / Investment is currently a **Category A**, in line with risk categorisation based on the below justification:

- The Project involves involuntary displacement and resettlement of communities along the railway route. However, these impacts are expected to be limited and can be addressed through appropriate social safeguards and mitigation measures.
- The project may pose health and safety risks during construction and operation phases. However these risks can be mitigated through implementation, training and adherence to in-country safety regulations and industry best practice.
- The project is expected to have environmental impacts such as land disturbance and potential disruption of natural habitats.

## 4.2 IFC PS ASSESSMENT FINDINGS,

### 4.2.1 IFC PS1 – ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

#### AFDB OS 1, ENVIRONMENTAL AND SOCIAL ASSESSMENT

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
Environmental & Social Management Systems	<p>The Contractor currently adopts the corporate, group-wide Environmental Management System (EMS) of Mota-Engil Engenharia E Construção África (MEECA). The EMS has been audited by Bureau Veritas and certified (valid till 1 June 2023) to be aligned with the requirements of the ISO 14001:2015 standard for the following scope: engineering and construction of all buildings, roads, motorways, railways, underground railways and utilities (fluids, energy and water), waste collection, urban cleaning and final waste disposal (waste management), extraction and transport to final processing (mining).</p> <p>The Contractor reported that the process of developing and implementing an Integrated Management System (IMS) encompassing ISO 14001:2015 (EMS), ISO 9001:2015 (QMS), and ISO 45001:2018 (OHSMS) is ongoing, targeted for implementation in 2025. This was corroborated by the available Market Internal Audit Report (ISO 9001, 14001, 45001, Legal and Contractual Requirement) of 04-07 December 2023.</p> <p>In line with MEECA’s cascading EMS requirements, the Contractor has established a Construction Phase Framework Environmental and Social Plan (CPFESP) for the project. The CPFESP sets the objectives and scope for identifying environmental management and mitigation actions required to be implemented during the project construction phase.</p> <p>Subsequently, a Construction Project Environmental Plan (CPEP) and a Social &amp; Community Sustainability Plan (SCSP), including project-specific environmental and social management plans (ESMPs) have been developed.</p>	<ol style="list-style-type: none"> <li>1. ME SHEQ Internal Audit Report NIGERIA _2023 (1)</li> <li>2. Mota-Engil Africa 14001 (IPAC)</li> <li>3. Project Environmental Plan</li> </ol>

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>The CPEP and SCSP, including all project-specific ESMPs, apply throughout the railway route, incorporating Nigeria and Niger-specific environmental and social (E&amp;S) regulatory requirements. The Contractor is yet to establish and maintain a legal register or process to identify and effectively track and ensure continuous compliance with E&amp;S legal requirements. The Contractor's status of compliance with E&amp;S regulatory requirements is highlighted in sub-section 6.1.</p>	
Policy	<p>A Group-wide safety, health, environment and quality (SHEQ) policy outlines Contractor's commitments to quality, safety, health and well-being, and environmental management. The SHEQ policy is approved by the Board of Directors of Mota-Engil Group (21 November 2023).</p> <p><i>The policy aims to promote the integration of Mota-Engil's Management System, based on the following premises:</i></p> <ul style="list-style-type: none"> <li>• <i>Alignment with Mota-Engil's Strategic plan;</i></li> <li>• <i>Action within the scope of sustainability;</i></li> <li>• <i>Applicable to all business units, markets, companies, projects and contracts;</i></li> <li>• <i>Integration of health and safety, environment and quality management systems; and</i></li> <li>• <i>Efficiency of the organization.</i></li> </ul> <p>The policy commits to complying with relevant national and local legal requirements, as well as internationally recognized SHEQ certifiable standard requirements. Abridged versions of the comprehensive SHEQ policy are displayed within Contractor's facilities and work areas. The Unit Managers for environment, health and safety, and quality (EHSQ) are responsible for project implementation and ensuring conformance with the policy.</p> <p>Periodic policy awareness training is conducted by the sub-units and as part of the induction programme for new employees and sub-contractors.</p>	<ol style="list-style-type: none"> <li>1. Policy SHEQ_21112023_EN</li> <li>2. SHEQ inductions_2024</li> </ol>

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
<p>Identification of Risk and Impacts, Area of Influence, and Impact Assessment</p>	<p>Studies relating to the identification of project E&amp;S risks, areas of influence, and impact assessment are conducted as part of the national environmental and social impact assessment (ESIA) or environmental impact assessment (EIA) processes in Nigeria and the Republic of Niger.</p> <p>An ESIA for the project components listed below has been conducted according to national ESIA laws and procedural guidelines:</p> <ul style="list-style-type: none"> <li>• Construction of Kano-Katsina-Jibiya-Maradi (Niger Republic) rail line with branch line from Kano-Dutse;</li> <li>• Granite quarry (340820QL) located in Hugungumai Village, Kunchi LGA, Kano State;</li> <li>• Granite quarry (35121QL) located in Kayuki Village, Batagarawa LGA, Katsina State; and</li> <li>• Kano-Maradi railway construction project/section: Maradi-Jibia.</li> </ul> <p>Furthermore, the national ESIA was subject to a review assessment against International ESIA standards, leading to the commissioning of supplemental E&amp;S studies to address identified gaps and the development of updated project ESIA and mitigations. Additional studies and mitigations cover the following:</p> <ul style="list-style-type: none"> <li>• Human rights;</li> <li>• Biodiversity;</li> <li>• Greenhouse gases and climate change;</li> <li>• Landscape and visual;</li> <li>• Cultural heritage;</li> <li>• Transport;</li> <li>• Soil and geology;</li> </ul>	<ol style="list-style-type: none"> <li>1. International ESIA</li> <li>2. National ESIA</li> <li>3. ESMP</li> <li>4. EIA certificate – KaMa</li> <li>5. EIA certificate – Kunchi</li> <li>6. FMEnv EIA approval – Kunchi</li> <li>7. Registration EIA permit – Katsina</li> <li>8. T.0063_S.26_C.5_Vol.1_259 - EIA Approval for the Proposed Construction of KAMA</li> <li>9. 0546.ME.LCD.SG.BNEE.DNEIES Translated Letter of Response</li> </ol>

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<ul style="list-style-type: none"> <li>• Noise and vibration;</li> <li>• Air quality; and</li> <li>• Socio-economics.</li> </ul> <p>The project proponent has received EIA approval and certifications, ("FMoT", dated 5 September 2023) and an EIA certificate (dated 5 September 2023) for the construction of Kano-Katsina-Jibiya-Maradi (Niger Republic) rail line with a branch line from Kano to Dutse.</p> <p>Similarly, the leaseholder for the granite quarry (340820QL) in Kano, Eso Terra Investment Limited, has received EIA approval (dated 28 April 2023) and an EIA certificate (dated 28 April 2023); whereas, correspondence (dated 5 March 2024) from the Federal Ministry of Environment (FMEnv), the national EIA regulator, indicates that the EIA process for the granite quarry (35121QL) in Katsina is at an advanced stage – the draft EIA report has been submitted and displayed for public comment (typically at FMEnv office Abuja, Kano State Ministry of Environment’s office, Batagarawa LGA office, and notification of display was published on two national dailies and announced on two local radio stations) for public/stakeholder’s input and is awaiting a specialist panel review. The Contractor has mobilized machinery to the Katsina quarry site; however, quarry activities are yet to commence.</p> <p>The ESIA covering sections from Jibiya to Maradi in Niger was submitted to the government regulators on 18 May 2022. In response, the Ministry of Environment and the Fight against Desertification informed the Contractor via a letter dated 24 May 2022 that a resettlement action plan (RAP) has to be prepared following Article 22 decree no. 2019-027/PRN/MESU/DD of 11 January 2019, to enable a unique/special evaluation workshop for both the ESIA and RAP. Consequently, the Contractor is yet to receive EIA approval for sections within Republic of Niger. The Contractor reported that the RAP is currently on hold due to the political situation in the Republic of Niger.</p>	

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>The Contractor’s obligations concerning the conditions for EIA approval are discussed under Management Programmes, such as the associated EMP and ISO14001 EMS.</p>	
<p>Greenhouse gases (GHG)</p>	<p>Technical Annex B provides an assessment of the greenhouse gas emissions from the project, baseline climate conditions in the study area, and future projections of climatic conditions to support a Climate Change Risk Assessment (CCRA), which are summarised as follows:</p> <ul style="list-style-type: none"> <li>• The GHG assessment is focused on Scope 1 and Scope 2 emissions during construction and operation. This includes: (1) emissions from fuel use during construction (Scope 1 emissions only, no grid electricity use is planned during construction); (2) emissions from land use conversion during construction; (3) emissions from fuel use during operation of the project (Scope 1 emissions, diesel fuel use by locomotives and emergency diesel generators); and (4) emissions from grid electricity use during operations (i.e., Scope 2 emissions).</li> <li>• The GHG assessment was prepared in 2022. The project developer should confirm that the underlying fuel consumption estimates (both diesel fuel and electricity) are still appropriate. The grid emissions factor applied in estimating Scope 2 emissions might also need updating.</li> <li>• The study concludes that operational GHG emissions will exceed 25,000 tonnes CO<sub>2</sub>e per annum and are therefore considered to be significant. The IFC performance standards require an annual assessment of GHG emissions (in accordance with internationally recognized methodologies and good practice) if emissions are expected to exceed this threshold.</li> <li>• Emissions during the construction phase of the project are also expected to exceed 25,000 tonnes CO<sub>2</sub>e per annum.</li> <li>• No estimates are provided of Scope 3 emissions; these are indirect value chain emissions, both upstream and downstream of the project. For example, the emissions</li> </ul>	<p>1. V.A Draft ESIA Report: V.A 14          Technical Annexes: V.A14.b Annex B: Climate Change</p>

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>associated with the production and transport of the raw materials used in the development of the project. The IFC Performance Standard (Performance Standard 3 on Resource Efficiency and Pollution Prevention) states that “the client will quantify direct emissions from the facilities owned or controlled within the physical project boundary, as well as indirect emissions associated with the off-site production of energy used by the project”. Therefore, the study is correct in focusing on the Scope 1 and Scope 2 emissions only, during construction and operational phases of the Project.</p> <ul style="list-style-type: none"> <li>Although not required by the IFC PS3, the GHG assessment could provide a high-level assessment of the GHG benefits associated with rail transport. Rail and waterborne transport have the lowest GHG emissions per kilometre of travel, when compared with road transport and aviation. To the extent that the project enables a mode shift from road to rail (for both cargo and passengers), the project will generate a net reduction in GHG emissions versus an alternative scenario without the rail project. These avoided emissions would provide additional context.</li> </ul>	
Physical Climate Change Risk Assessment (CCRA)	<p>The Technical Annex B Climate Change Report from 2022, provides baseline climate conditions in the study area, and future projections of climatic conditions to support a Climate Change Risk Assessment (CCRA). The following are gaps in the CCRA report and recommendations and corrective actions for aspects that can be improved on / updated:</p> <p><b>Time Horizons missing:</b> there is limited explanation and justification as to the time horizons that were used within this assessment, or if they have been aligned and adapted to the expected schedule of the construction, operational and decommissioning phases.</p> <ul style="list-style-type: none"> <li>For physical climate risk, it is recommended to review trends over generally longer timeframes / time horizons, as it provides a clearer indication of possible emerging issues. The baseline and 2030 time horizons therefore should be provided as an insight to the possible climate trends for the construction stage and beginnings of</li> </ul>	<ol style="list-style-type: none"> <li>RfP: KanoMaradi ESIA Final – 02102020</li> <li>V.A Draft ESIA Report: V.A 14 Technical Annexes: V.A14.b Annex B: Climate Change</li> </ol>

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>the operational stage, whereas 2050 and 2080 should be used to provide insight to the climate trends towards the later stages of the operational and decommissioning phases.</p> <ul style="list-style-type: none"> <li>• <b>Corrective actions</b> - the time horizons / timeframes that were used need to be provided as well as their justification. Additionally, information is required on whether they are relevant and adapted for the three phases of the project and not only for projections.</li> </ul> <p><b>No detailed assessment on the Construction phase:</b> the construction phase, even though it is only three years, also needs to be included in the Climate Change Risk Assessment:</p> <ul style="list-style-type: none"> <li>• Physical climate risks and trends need to be reviewed over generally longer timeframes as they provide a clearer indication of possible emerging issues. Hence, that is why the baseline (at least the last 30 years), and the 2030 timeframes are the basis / foundation to identify the risks and actual impacts on the project site receptors / project component and for the surrounding communities / areas that the railway line traverses during the construction phase.</li> <li>• If the construction phase is missing from the detailed assessment, it does not show a complete picture of the project. As the passenger and freight railway line from Kano to Maradi is approximately 284km and will have at least 500m buffer on each side, it will traverse a variety of mixed and varied land use and topography. This line will traverse: roads; rivers; powerlines; wetlands / floodplain areas; built up areas; towns; farming areas and communities. Therefore, all these aspects need to be considered within the construction phase.</li> <li>• <b>Corrective actions</b> - the construction phase also needs to be assessed in detail for this project.</li> </ul> <p><b>A more detailed site receptors (project component) list is needed:</b> There is not a detailed list upfront as to which receptors / project component and / or what was assessed</p>	





PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>on site, e.g.: what site receptors / assets (element exposed) were used and evaluated against the identified Climate Hazards for the duration of the project (all phases). These are only mentioned later in the Operational Stage Climate Change Risk Assessment.</p> <ul style="list-style-type: none"> <li>• There is only a very high level project component list for the phases. It needs to include more specific project details such as: what machinery, storage and materials, operations and structures, transport, infrastructure, and human aspects were included and considered.</li> <li>• The physical impacts of climate change pose a threat to business operations and their specific site receptor’s and may have financial consequences through impacts of extreme weather events. The effect of these changes could result in business interruption through damage to physical assets (site receptors). Understanding the nature of these risks on all the site receptors will support the site in increasing its resilience against climate change and its various site receptors.</li> <li>• <b>Corrective actions</b> - a list of the various site receptors / assets that were evaluated needs to be provided upfront, including which ones are relevant for which phase of the project.</li> </ul> <p><b>Site climate results:</b> It would be beneficial to have climate results (for both baseline and projections) at a more local / site level scale as that gives more applicability to the site.</p> <ul style="list-style-type: none"> <li>• Climate results for both baseline and projections that show more local / site level scale gives the current findings and projections more applicability and usability for the site.</li> <li>• <b>Corrective actions</b> – more local / site level scale findings and projections need to be provided for the project for all phases.</li> </ul> <p><b>Risk Scores:</b> It would be valuable to provide risk scores before and after suggested mitigations were applied. Hence, it will show the effect that the mitigations may have on the ratings for each risk.</p>	

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<ul style="list-style-type: none"> <li>• Having risk scores after mitigations shows the effect that the mitigations may have on the ratings for each risk, giving the mitigations more substance.</li> <li>• <b>Corrective actions</b> – risk scores after mitigations need to be provided.</li> </ul>	
<p>Management Programmes</p> <p>AfDB OS9: Financial Intermediaries</p>	<p>The following project-specific ESMPs are in place:</p> <ul style="list-style-type: none"> <li>• Air quality management plan;</li> <li>• Biodiversity management plan;</li> <li>• Borrow pit management plan;</li> <li>• Chance finds procedure;</li> <li>• Cultural heritage management plan;</li> <li>• Demolition management plan;</li> <li>• Dust management plan;</li> <li>• Hazardous materials management plan;</li> <li>• Noise management plan;</li> <li>• Soil management plan;</li> <li>• Spill response plan;</li> <li>• Waste management plan;</li> <li>• Wastewater management plan;</li> <li>• Water management plan; and</li> </ul>	<ol style="list-style-type: none"> <li>1. ESMP</li> <li>2. FMEV EIA approval – Kunchi</li> <li>3. Registration EIA permit – Katsina</li> <li>4. T.0063_S.26_C.5_Vol.1_259 -EIA Approval for the Proposed Construction of KAMA</li> </ol>

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<ul style="list-style-type: none"> <li>Stakeholder engagement plan.</li> </ul> <p>EnvAccord could not validate the adequacy and efficiency of implementing the ESMP measures on site, due to low and inconsistent implementation observed during the site visit. Various plans and procedures have been developed but it is unclear under whose role and responsibilities these fall. For example, periodic environmental compliance monitoring has yet to commence, whereas some aspects of biodiversity management are being implemented. No information on buffer zones around protected areas was provided for review. The Contractor reports that implementation of the ESMP measures will be managed by a third-party E&amp;S consultant and the process of agreeing on the scope and engaging the consultant is ongoing. No timeframe has been provided for completion.</p> <p>Furthermore, the Contractor is obligated to implement the following conditions for EIA approval, which have not been developed formally into policies or procedures:</p> <ul style="list-style-type: none"> <li><i>Ensure Implementation of energy-efficiency measures during project construction and operation.</i></li> <li><i>Develop an energy transition plan for the project.</i></li> <li><i>Establish buffer zones for the project in accordance with regulatory standards.</i></li> <li><i>Carry out appropriate sensitization campaigns during the project construction and operation.</i></li> <li><i>Develop and fully implement Resettlement Action plan (RAP) for the project. A copy shall be submitted to the Federal Ministry of Environment.</i></li> <li><i>Ensure that project implementation shall be in line with national and international best practices on cultural heritage sites, archeological sites and artefacts.</i></li> <li><i>Ensure that all relevant regulatory standards are adhered to for the project development and operations.</i></li> </ul>	

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<ul style="list-style-type: none"> <li>• <i>Provide underpasses and bridges at intervals along the corridor to facilitate local traffic and livestock migrations.</i></li> <li>• <i>Provide sufficient drainage in the form of culverts and/or subsurface drainage (in addition to above bridges) to avoid fragmentation of seasonal and perennial natural water flows and associated ecological corridors. Such drainage structures need to be aligned to anticipated climatic change.</i></li> <li>• <i>Develop and implement a comprehensive Maintenance Management programme for the corridor.</i></li> <li>• <i>Provide an adequate decommissioning and abandonment Plan for the project.</i></li> <li>• <i>Ensure implementation of the Environmental Management Plan (EMP) for the project.</i></li> <li>• <i>Develop and implement a Memorandum of Understanding (MoU) with the project's Host Communities. This shall be witnessed by all relevant regulatory authorities.</i></li> <li>• <i>Ensure continuous consultations with the project's host communities, relevant regulatory authorities and other stakeholders throughout the project's lifespan.</i></li> <li>• <i>Establish an Environmental Management System (EMS) for the project.</i></li> <li>• <i>Preparation of an annual sustainability report which shall be submitted to the Environmental Assessment Department of the Federal Ministry of Environment.</i></li> </ul> <p>Similarly, being the operator of the Kano granite quarry, the Contractor is obligated as follows in fulfilment of EIA conditions for approval, which have not been provided for review:</p> <ul style="list-style-type: none"> <li>• <i>ESO Terra Investment Limited shall develop and implement a Climate Change Mitigation and Adaptation Plan for the project.</i></li> <li>• <i>ESO Terra Investment Limited shall implement energy-efficiency measures during project construction and operation.</i></li> </ul>	

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<ul style="list-style-type: none"> <li>• ESO Terra Investment Limited shall develop an energy-transition plan for the project.</li> <li>• ESO Terra Investment Limited shall develop an environmental Protection and Rehabilitation Programme (EPRP) and Community Development Agreement (CDA) for the project to be approved by the Ministry of Mines and Steel Development (MMSD). Evidence of the approval shall be forwarded to the Federal Ministry of Environment.</li> <li>• ESO Terra Investment Limited shall put in place an Occupational Health and Safety Management Plan for the project.</li> <li>• ESO Terra Investment Limited shall put in place a Waste Management Plan for the project.</li> <li>• ESO Terra Investment Limited shall fully implement the Environmental Management Plan (EMP) for the project.</li> <li>• ESO Terra Investment Limited shall ensure continuous consultation with the project's host communities, relevant regulatory authorities and other stakeholders throughout the project's lifespan.</li> <li>• ESO Terra Investment Limited shall prepare annual sustainability reports, using the Global Reporting Initiative (GRI) Guidelines. The report shall be submitted to the Environment Assessment Department of the Federal Ministry of Environment.</li> <li>• The Federal Ministry of Environment in collaboration with other relevant Regulatory authorities shall carry out EIA Impact Mitigation Monitoring (IMM), Environmental Audits (EAu) and Compliance Monitoring exercises on the project.</li> <li>• There shall be an Environmental Management System (EMS) for the project.</li> </ul> <p>Findings indicate that the majority of the EIA approval conditions listed above are yet to be actioned and implemented. A systematic procedure or action plan for addressing the conditions for EIA approval is not in place.</p>	

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
<p>Organisational Capacity and Competency, Contractual Management</p>	<p>The internal capacity to ensure effective E&amp;S management is considered appropriate, with sufficient well-experienced resources in place. The SHEQ Manager and E&amp;S Manager have combined relevant experience of over 30 years. A Deputy E&amp;S Manager joined the team recently (February 2024).</p> <p>Each sub-unit of the SHEQ department maintains an annual training programme for capacity building of personnel and the general workforce. The Contractor’s SHEQ organogram is presented in Annex A.</p> <p>The current numbers and ratios for E&amp;S supervision to project activities are considered adequate. However, the Contractor agreed that further expansion of the E&amp;S management team is required as the project progresses, especially in the area of field (work front) supervision and monitoring. A formal E&amp;S staffing plan is yet to be developed.</p> <p>E&amp;S aspects for construction sub-contractors are managed through the Project Quality Plan. These include:</p> <ul style="list-style-type: none"> <li>• Approval of the sub-contractor’s SHEQ management plan;</li> <li>• Inclusion of relevant SHEQ clauses in the contract;</li> <li>• Medical examination and fitness certification;</li> <li>• Inventory of tools and equipment accepted by the Engineering and SHEQ departments;</li> <li>• Verification of competency for equipment operators and mechanics;</li> <li>• Security clearance;</li> <li>• Qualified responsible person for overseeing safety; and</li> <li>• SHEQ risk assessment and monitoring.</li> </ul>	<ol style="list-style-type: none"> <li>1. E&amp;S organogram (SHEQ)_REV1</li> <li>2. Project quality plan</li> </ol>

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
Emergency Preparedness and Response	<p>A Project emergency and preparedness plan (EPP) is in place including designated roles and responsibilities for implementation and supervision. Existing procedures include emergency preparedness, general evacuation and response training, emergency levels, transfer services to referral hospitals, international evacuation, and evacuation drills. Sub-documents maintained based on the EPP include:</p> <ul style="list-style-type: none"> <li>• Emergency contact details;</li> <li>• A Flow chart procedure in case of accidents;</li> <li>• A general evacuation response procedure – flow chart;</li> <li>• Emergency assembly point locations; and</li> <li>• Mock drill reports.</li> </ul> <p>The EPP stipulates the requirement for at least one emergency evacuation drill annually and the most recent emergency response drill at the Kazaure camp site and production facility was conducted on 16 November 2023. According to the emergency drill report, 11 issues were identified with corresponding recommendations for improvement.</p> <p>The frequency of conducting emergency mock drills (once annually) does not meet good international industry practice which requires at least bi-annual emergency mock drills.</p> <p><i>'In a workplace with serious fire hazards (for example, flammable materials or difficult egress as in high rise buildings), fire drills should be conducted at least once every 3 months. In other workplaces every 6 months may be adequate.'</i> – EHS Daily Advisor</p> <p>No records of any environmental incidents have been recorded on the project in the last two years. The Contractor recorded four medical treatment cases in 2023 with no lost time injuries (LTI) recorded, while five LTI cases (one in January and four in February) have been recorded so far in 2024.</p>	<ol style="list-style-type: none"> <li>1. 0_Emergency and preparedness plan rev.01_pre</li> <li>2. 1_Emergency contacts rev.01_pre</li> <li>3. 2_Emergency plan – fluxogram rev.01_pre</li> <li>4. 2.1 Response preparedness rev.01_pre</li> <li>5. 3.1 Assembly emergency point location_Kazaure</li> <li>6. 4_Mock-drill-report-16-11-2023</li> <li>7. ME Health and safety KPIs- 2023</li> <li>8. ME Health and safety KPIs- 2024</li> </ol>

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>Emergency response and early detection equipment like portable fire extinguishers and fire alarm systems are in place and serviceable at the campsite and quarry. Portable fire extinguishers are also provided at active worksites along the railway route.</p>	
<p>Monitoring and Reviews AfDB OS9: Financial Intermediaries</p>	<p>Management reviews are conducted annually in line with MEECA's EMS requirements as part of its Market Internal Audit (MIA). The most recent MIA for the project was conducted between 4-7 December 2023 and covered elements of ISO 9001, 14001, 45001, legal and contractual requirements.</p> <p>External monitoring and review such as impact mitigation monitoring (IMM) is conducted by the national environment regulator, FMEnv, in collaboration with the various State offices. So far, no IMM has been conducted on the project.</p>	<ol style="list-style-type: none"> <li>ME SHEQ Internal Audit Report NIGERIA_2023 (1)</li> <li>Sustainability audit diagnosis checklist</li> </ol>
<p>Stakeholder Engagement AfDB (OS10): Stakeholder Engagement and Information Disclosure</p>	<p>The Contractor has developed a stakeholder engagement plan (SEP) based on the SCSP. The aim of the plan is <i>'...to ensure that a consistent, comprehensive and coordinated approach is taken to stakeholder engagement and project disclosure throughout the project construction phase.'</i></p> <p>Key elements of the SEP include:</p> <ul style="list-style-type: none"> <li>Stakeholder identification;</li> <li>Stakeholder engagement strategy;</li> <li>Roles and responsibilities;</li> <li>External grievance mechanism; and</li> <li>Monitoring, evaluation and reporting.</li> </ul> <p>Documents and records to be kept based on the SEP include:</p> <ul style="list-style-type: none"> <li>Stakeholder register;</li> </ul>	<ol style="list-style-type: none"> <li>Stakeholder engagement plan</li> <li>Social and community sustainability plan</li> </ol>



PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<ul style="list-style-type: none"> <li>• Meeting minutes;</li> <li>• Attendance list; and</li> <li>• Grievance register.</li> </ul> <p>Although the Contractor has identified and periodically engages with some stakeholders, including government regulators (national, state, local), and project-affected communities (PACs), a comprehensive and well-structured stakeholder register that will ensure engagements meet planned objectives in the most effective ways is not in place.</p>	
<p>External Communications and Grievance Mechanism</p> <p>AfDB (OS10): Stakeholder Engagement and Information Disclosure</p>	<p>The Contractor’s SEP provides an overview of communication management between the company and its stakeholders. A Community Liaison Officer (CLO) has been appointed as a primary link between the Contractor and external stakeholders. It is noted that the project has a high number of PAPs in the Project Area of Influence, especially in urban areas such as Katsina Station.</p> <p>Section 8 of the SEP states as follows... <i>‘In line with GIIP and to ensure that all grievances that may arise over the course of the project are resolved as quickly as possible, a CGM is required and will be developed and implemented by the Project.’</i></p> <p>Although a CGM (company-community grievance mechanism) is not in place, a grievance redress management (GRM) procedure (has been established by the Contractor. The procedure outlined in the GRM involves:</p> <ul style="list-style-type: none"> <li>• Lodging a grievance;</li> <li>• Acknowledgement and recording of grievances;</li> <li>• Assessing grievances;</li> <li>• Investigations;</li> </ul>	<ol style="list-style-type: none"> <li>1. Stakeholder engagement plan</li> <li>2. Grievance management procedure</li> <li>3. Grievance log (sighted during site visit)</li> </ol>

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<ul style="list-style-type: none"> <li>• Responding;</li> <li>• Mediation; and</li> <li>• Close-out.</li> </ul> <p>Furthermore, reporting, document control and data management, monitoring and review are key elements of the GRM.</p> <p>A log of external grievances was sighted by the EnvAccord team during the site visit. Some of the issues captured in the register are related to payment of compensation for land, ESIA/RAP issues, access road compensation, etc. Feedback from our engagement with some PAC members indicated that many PAPs are not aware of the grievance procedure or existing channels for reporting complaints. In addition, an anonymous means of providing feedback or reporting grievances has not been provided for the project.</p>	
<p>Ongoing Reporting to Affected Communities</p> <p>AfDB (OS10): Stakeholder Engagement and Information Disclosure</p>	<p>External reporting is addressed in the SEP (sub-section 8.4).</p> <p><i>'MENG will keep track of commitments made (through the meeting minutes) and will communicate progress made against these commitments on a regular basis (for instance during regular meetings with the community representatives).'</i></p> <p>This provision in the SEP addresses feedback to communities on reported issues or commitments but does not provide information on relevant E&amp;S indicators or project impacts, management and performance. In addition, the frequency of reporting is not stipulated.</p>	<p>1. Stakeholder engagement plan</p>

## 4.2.2 IFC PS2 – LABOUR AND WORKING CONDITIONS

### AFDB OS 2 (OS2): LABOUR AND WORKING CONDITIONS

PS2 / OS2 Requirements and Guiding Questions	Current Status	Documents Reviewed
Occupational Health and Safety	<p>The Contractor has a Safety, Health, Environment and Quality Policy which outlines all its H&amp;S commitments, and it is actively implemented at the local level. Contractor’s health and safety (H&amp;S) sub-unit of SHEQ department is headed by an H&amp;S Manager with over 30 years relevant work experience. The Manager is assisted by two H&amp;S co-ordinators, 18 Safety Officers, and 30 others (including flagmen and traffic wardens). There are various detailed documents showing how occupational incidents and accidents are managed for the project. Regular targeted awareness and training on H&amp;S and daily toolbox talks for direct and third-party employees are conducted.</p> <p>Interviews and observations during the site visit indicated the following:</p> <ul style="list-style-type: none"> <li>• There is a fully-fledged SHEQ Department that coordinates the occupational health and safety of workers and sub-contractors.</li> <li>• Workers were observed to be working safely and complying with proper use of PPE.</li> <li>• Daily safety toolbox talks are mandatory before the commencement of work.</li> <li>• Health and Safety Officers are attached to every unit to monitor and enforce safety compliance.</li> <li>• There are regular targeted H&amp;S training programs for both direct and third-party employees.</li> <li>• Pre-employment health check-up is conducted for all employees including contractor workers.</li> <li>• Health checkups are conducted once a year for workers/employees (usually on an employee’s birthday).</li> <li>• Safety induction trainings are organized for new employees and contract workers.</li> <li>• Workers are oriented on the effective use of PPE.</li> </ul>	<ol style="list-style-type: none"> <li>1. Contractor Safety, Health, Environment and Quality Policy;</li> <li>2. Social and Community Sustainability Plan: Kano-Maradi Single Track Standard Gauge railway Line 10001 NIG. KAMA- MENG -SU PLN0005;</li> <li>3. ESIA Preliminary Early works on ESMP (Dawanau to Kazaure Section)</li> </ol>

PS2 / OS2 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<ul style="list-style-type: none"> <li>• The Contractor maintains a logbook of monthly staff training, inductions, and beneficiaries. Other logs kept include number of incidents, near misses, safety good practices, unsafe acts recorded, man hours lost to injuries, etc.</li> <li>• There are first aid kits and trained first aiders at the campsite and active work areas where preliminary treatment of minor cuts and wounds is administered. For moderate illness/injuries, the cases are transferred to Contractor’s health facility within the Kazaure camp site. Serious cases are referred to hospitals in Kano.</li> <li>• Fire extinguishers are provided in strategic locations.</li> <li>• Safety and caution signage is provided within the campsite and active worksites, including speed limit signs. However, it was observed that there is limited compliance with speed limits within the campsite and Katsina quarry.</li> <li>• It was noted that rest areas within the worksites are inadequate. Some workers were observed resting under storage containers and articulated vehicles during break hours.</li> </ul> <p>H&amp;S records indicated that eight H&amp;S incidents were recorded in 2023 and nine have so far been recorded in 2024. A review of the accident record indicated that the majority are motor vehicle accidents. For instance, of the nine recorded incidents in Q1 2024, eight are motor vehicle-related incidents, while one is associated with the use of hand and power tools. The contractor is addressing motor vehicle incidents by installing speed limiting devices in all passenger vehicles and enforcing compliance with speed limits within the work sites and campsites. Additional measures including the engagement of a Road Safety Coordinator to oversee road traffic issues and driver selection and training processes may be recommended.</p>	
Human Resources Policy	The Contractor has adopted its HR Group policies for the project execution. Few of these policies such as those for Forced and Compulsory Labour, Child Labour and Equal Opportunity have been adopted at the local level; Feedback from the Contractor indicated	<ol style="list-style-type: none"> <li>1. Contractor HR Global Policy- Think Global</li> <li>2. Act Local;</li> </ol>

PS2 / OS2 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>that there are policies on Grievance Redress and Gender Based Violence (GBV). It is noted that most of the workers interviewed do not have access to these policies. Discussions are currently on-going with the National Union of Civil Engineering Construction, Furniture, and Wood Workers, the relevant union for the employees. These discussions will hopefully culminate in the establishment of a local branch of the union once they are concluded.</p> <p>The Contractor has an employee handbook that describes HR policies, guidelines and procedures on employee’s expectations, job title and description, probation, confirmation and employment on-boarding, standard working hours and conditions of service, attendance, dress code, work ethics, violence at workplace, drugs, alcohol &amp; other banned substances in the workplace, harassment among others. However, most of the workers interviewed reported that they do not have copies of, or have not seen the handbook.</p> <p>There is also a contract letter for new employees indicating dates of appointment, duties, remuneration, incentives, annual salary review, performance review, probation, work hours, meal intervals, leave, sick leave, maternity and paternity leave, termination, retirement, etc. However, feedback from interviewed workers indicated that employment contracts or letters are not issued for upwards of six months after being hired. The Contractor has taken steps to address this gap by issuing employment letters to all affected staff in accordance with the Nigerian laws.</p> <p>A sample contract letter (for expatriates) that was made available, revealed that this category of workers works for 45 hours between Monday and Saturday (5 hours on Saturdays).Further clarifications provided by the Contractor indicated that employees may be required to work additional hours as may be necessary to meet deadlines. Any work exceeding 45 hours per week or performed on non-working days is considered overtime and is compensated. Employees who are unable to put in extra hours of work require the permission of the relevant Supervisor to not work the overtime.</p>	<ol style="list-style-type: none"> <li>3. Employee Handbook: Contractor (Nigeria);</li> <li>4. SERVICE ORDER: Human Resources Global Policy;</li> <li>5. -Social and Community Sustainability Plan</li> <li>6. Anti-Harassment and Discrimination Policy;</li> <li>7. Contractor Harassment and Discrimination Policy N. ° 03/2022 DATE: 08/06/2022;</li> <li>8. Sample of Employees’ Contract letter; and</li> <li>9. Grievance Procedure.</li> </ol>

PS2 / OS2 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>The sample contract letter for local employees contains basic information, job title, grade and duration, remuneration benefits, employee responsibilities, employer’s undertakings, working hours, leave and absences, payroll deductions and pensions, termination of employment, dispute resolution, etc. They also work for 45 hours between Monday and Saturday (5 hours on Saturdays) but may be required to work additional hours as may be necessary to meet deadlines. Any work exceeding 45 hours per week or performed on non-working days is considered overtime and is compensated. Employees who are unable to put in extra hours of work require the permission of relevant Supervisor to not work the overtime.</p> <p>Regarding the 2X challenge, the proportion of women in the leadership position in the Nigerian office is low, and is the same for the entire workforce. Globally, only between 5-10% of women are in top management positions. Of the 1,495 full time employees of the Contractor, 56 are females, which is understood to be more because of cultural inhibitions and the industry sector rather than a deliberate policy of discrimination.</p>	
Organisational Capacity	<p>The HR unit at the project site is headed by a Human Resources Representative who reports to the HR Manager in Lagos. He is assisted by a HR Technician and a few other staff. The HR unit coordinates local recruitment processes and personnel issues while consulting with the Lagos office. The Contractor has regular training programmes for its internal staff; there are also periodic awareness and targeted trainings for other staff of the Contractor as well as third party workers. In terms of adequacy of staff, it was observed that for the present stage of the project, the number of staff on the ground is adequate, but the Contractor acknowledged that there will be need to hire additional staff as more sections of the project come on-board.</p>	<ol style="list-style-type: none"> <li>1. Contractor HR Global Policy-Think Global</li> <li>2. Act Local;</li> <li>3. -Employee Handbook: Contractor (Nigeria); and</li> <li>4. -SERVICE ORDER: Human Resources Global Policy.</li> </ol>
Worker Grievance Mechanism	<p>A grievance procedure is documented in the employee handbook including process and feedback timelines. The Contractor maintains a grievance register; however, no formal complaints have been logged in the register. Contractor reports that most grievances are</p>	<ol style="list-style-type: none"> <li>1. -Contractor’s Grievance Management Procedure-Kano-Maradi Single Track</li> </ol>

PS2 / OS2 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>resolved informally and are not logged in the grievance register. In addition, the Social and Community Sustainability Plan spells out clearly the procedure for internal grievance redress at the local level. However, discussions with workers revealed that the procedures are poorly understood; and that the procedure does not allow for anonymity.</p>	<p>Standard Gauge railway Line 10001 NIG. KAMA- MENG -SU PRO 000859 REV 00 23/02/23;</p> <ol style="list-style-type: none"> <li>2. Grievance Register HR Kano Project (Template)</li> <li>3. Employee Handbook: Contractor (Nigeria);</li> <li>4. SERVICE ORDER: Human Resources Global Policy; and</li> <li>5. Social and Community Sustainability Plan.</li> </ol>
Working Conditions	<p>The Contractor’s staff work seven days per week (Monday to Sunday). The official working hours on the site are as follows:</p> <ul style="list-style-type: none"> <li>• Monday to Friday (8 am – 5 pm) and total of nine hours per day.</li> <li>• Saturday (8 am – 1 pm) and total of 5 hours per day.</li> <li>• Sunday (8 am -12 pm) and limited to only two Sundays per month).</li> </ul> <p>Work on Saturdays and Sundays is considered over time, but not mandatory. Renumeration for over time is also paid for work concluded after 5 pm for weekdays based on employees’ basic salaries.</p> <p>The salary for the average worker is three times the national minimum wage.</p> <p><b>Terms of Employment.</b> New recruits fill admission forms or pre-agreement forms upon being hired and receive a formal letter of appointment three months or longer after appointment. This was confirmed through interviews with workers on the site. The Contractor has taken steps to ensure that contract letters are duly provided to all relevant employees.</p>	<ol style="list-style-type: none"> <li>1. Contractor HR Global Policy- Think Global</li> <li>2. Employee Handbook: Contractor (Nigeria);</li> <li>3. SERVICE ORDER: Human Resources Global Policy;</li> <li>4. Social and Community Sustainability Plan;</li> <li>5. Employment Contract Template (Expatriates)</li> <li>6. Contractor Nigeria Employment Contract (locals); and</li> <li>7. Kano-Maradi ESIA Preliminary Early works on ESMP</li> </ol>

PS2 / OS2 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>The sample contract letter for local employees contains basic information, job title, grade and duration, remuneration benefits, employee responsibilities, employer’s undertakings, working hours, leave and absences, payroll deductions and pensions, termination of employment, dispute resolution, one-hour lunch break, etc.</p> <p><b>Benefits:</b> Most of the Contractor’s workers are covered by the Contractor policy. They also have access to free medical services at the Contractor’s camp medical facilities and are enrolled with the contributory pension scheme of the Federal Government. Additional information and documentation from the Contractor indicated that the workers are covered under the Nigerian Social Insurance Trust Fund (NSITF) scheme, which is a statutory requirement for all full-time workers in Nigeria.</p> <p>There is a dedicated staff <b>canteen</b> for expatriate workers and a few Nigerian workers whose job descriptions make it difficult for them to observe regular break hours (such as canteen workers). The remaining workforce receives a daily food allowance fee, and they are allowed to source their own food.</p> <p>The <b>accommodation facilities</b> have water and toilet facilities and recreational spaces. There is provision for transportation to convey staff to and from work. There are mobile toilet facilities and drinking water points for workers at the camp site as well as a place for Muslim prayers. Recreational facilities at the camp site include a swimming pool, volleyball court and tennis court, some of which are still under construction.</p> <p><b>Retrenchment.</b> The Contractor outlines conditions for dismissal/ termination of employees in their contract letters (often due to misconduct). To date there have not been any retrenchments or collective dismissals. Interviewees indicated that isolated cases of dismissals are often on grounds of repeated misconduct and this was confirmed by the Contractor.</p>	<p>(Dawanau to Kazaure Section).</p>



PS2 / OS2 Requirements and Guiding Questions	Current Status	Documents Reviewed
Human Rights	<p>Human rights concerns or risks could occur at two levels - at the level of the workers within the organisation and at the level of the community members. The Contractor has established relevant policies on non-discrimination, sexual harassment, etc. Although additional information provided by the Contractor indicated that an HIV/AIDS test is not required for pre-employment screening, interviews with personnel of the staff medical unit suggested that HIV-positive applicants were excluded during recruitment. In response, the Contractor reported the decision to outsource the Medical Unit to a new sub-contractor with a clear mandate to adopt international best practices. It is noted that there are no workers' unions presently. However, additional information provided by the Contractor indicated that discussions are currently on-going with the National Union of Civil Engineering Construction, Furniture, and Wood Workers, the relevant union for the employees. These discussions will hopefully culminate in the establishment of a local branch of the union once they are concluded. The human rights risks that relate to the community include loss of land, water sources, structures, access roads and cultural heritage. Most community members affected by the project have been compensated, though there are still grudges because compensations are perceived to be inadequate and below the requirements of IFC PS5.</p>	<ol style="list-style-type: none"> <li>1. Kano To Maradi Rail, Nigeria and Republic of Niger: Human Rights Impact Assessment;</li> <li>2. Contractor Human Resources Policy;</li> <li>3. -Contractor Employee Handbook;</li> <li>4. Kano-Maradi Social and Community Sustainability Plan;</li> <li>5. Contractor Anti-Harassment and Discrimination Policy; and</li> <li>6. Mota- Engil Harassment and Discrimination Policy.</li> </ol>
Gender Risk	<p>There is a corporate policy on GBV. The Contractor also reported that there are clear reporting lines at the site level. However, interactions with staff at the camp site indicated that they were not sure about reporting line, suggesting a need for greater awareness. A sexual harassment incident occurred between a sub-contractor and one of his staff members and was handled internally at the site level to avoid escalation. Additional information from the Contractor indicated that steps are being taken to create more awareness about GBV and reporting lines, and to ensure that Sub-contractors provide mandatory training on sexual harassment for their employees.</p>	<ol style="list-style-type: none"> <li>1. Contractor Employee Handbook;</li> <li>2. Contractor Anti-Harassment and Discrimination Policy;</li> <li>3. Contractor Harassment and Discrimination Policy; and</li> <li>4. Contractor Gender report - Year End 2023 Summary.</li> </ol>

PS2 / OS2 Requirements and Guiding Questions	Current Status	Documents Reviewed
Non-Discrimination	The Contractor has a corporate policy of non-discrimination which extends to persons with disability. The Contractor has ~36 female employees, a few of them in senior positions. The staff strength reflects people of diverse nationalities, ethnicities, religions, and gender.	<ol style="list-style-type: none"> <li>1. Human Resources Policy;</li> <li>2. Employee Handbook;</li> <li>3. ESIA Impact Assessment Chapter; and</li> <li>4. Contractor Gender Equality Plan 2024.</li> </ol>
Worker Organisations	Interviews with management and workers of the Contractor revealed that there is no active union for their representation. The Contractor reported that discussions are currently ongoing with the National Union of Civil Engineering Construction, Furniture, and Wood Workers, the relevant union for the employees. These discussions will hopefully culminate in the establishment of a local branch of the union once they are concluded.	<ol style="list-style-type: none"> <li>1. Contractor Human Resources Policy; and</li> <li>2. Contractor Employee Handbook.</li> </ol>
Contractor Management	<p>There are currently 15 sub-contractors on site employed directly by the Contractor as the EPC. There is a corporate-level policy and guidelines for appointment of sub-contractors. The appointed sub-contractors are identified based on the technical and statutory requirement and past performance records. The contracts with these sub-contractors contain environmental and social clauses.</p> <p>The Contractor also monitors the activities of sub-contractors to ensure compliance with ESMP, labour laws regarding child labour, forced labour and non-discriminatory practices. The sub-contractors submit daily reports of their activities to the Contractor (copies were reviewed during the sit visit). Some sub-contractors did not have their own distinct ESMP and relied on the main Contractor's ESMP, with a few reports of breaches and non-compliance with safety standards. Breaches were mostly related to compliance with use of PPE, especially hard hats.</p> <p>Copies of the sub-contractors' agreement were not available for review but oral interviews with some of the sub-contractors indicated that the agreement contains details of safety</p>	<ol style="list-style-type: none"> <li>1. ESIA Preliminary Early works on ESMP (Dawanau to Kazaure Section);</li> <li>2. Contractor management procedure; and</li> <li>3. Contractors' daily report.</li> </ol>

PS2 / OS2 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>expectations, and that the Contractor conducts routine inspections and monitoring. The Contractor also provides routine H&amp;S training for third-party workers.</p>	



### 4.2.3 IFC PS3 – RESOURCE EFFICIENCY AND POLLUTION

#### AFDB OS 3 (OS3): RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT

PS3 / OS3 Requirements and Guiding Questions	Current Status	Documents Reviewed
Resource Efficiency (Water Supply)	<p>Water requirements for the project activities are obtained from existing dams and new groundwater sources across the project States. The Contractor has received the following water abstraction permits:</p> <ul style="list-style-type: none"> <li>• Water lift permit from Jakara dam and Thomas dam, issued by the Ministry of Water Resources, Kano State dated 13 January 2023;</li> <li>• Approval to use water from Daberam dam, Tsbu dam, and Karkarku dam, issued by the Katsina State Ministry of Agriculture and Natural Resources dated 19 January 2023; and</li> <li>• Approval for the drilling of boreholes at Kazaure base camp, issued by Jigawa State Urban Development Board dated 30 March 2023.</li> </ul> <p>Available records show that a cumulative total of 58,740,500 litres of water was utilized on the project in 2023 while 16,039,500 litres and 10,388,000 litres have been utilized respectively in January and February 2024.</p> <p>The Contractor has developed a water management plan that includes the following water-saving recommendations:</p> <ul style="list-style-type: none"> <li>• Water-saving devices (e.g. pressure taps, flush limiters);</li> <li>• Greywater recycling;</li> <li>• Environmental awareness training; and</li> <li>• Water counter meter controls.</li> </ul>	<ol style="list-style-type: none"> <li>1. Water management plan</li> <li>2. 20230119_Katsina water permit</li> <li>3. 20230113_Re Kano State water permit approved</li> <li>4. Jigawa letter of water permit</li> <li>5. Kano State water permit approved</li> <li>6. Kazaure borehole permit site camp</li> <li>7. Katsina State Ministry of Water letter</li> </ol>

PS3 / OS3 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>The Contractor is practising water conservation through awareness creation by the SHEQ team; however, other water efficiency programs like the use of water saving devices and greywater recycling are yet to be implemented.</p>	
<p>Resource efficiency (unnecessary abstraction of water resources and impacts on surrounding communities)</p>	<p>The borrow pit management plan indicates that aquifer depth will be assessed at all borrow pits. Where possible, the floor elevation of the borrow pit will be maintained above the groundwater level. This will help avoid impacts on the water supply volume to surrounding communities.</p> <p>In borrow pits where the groundwater level is breached, water abstraction will be licenced. Water consumption will be monitored monthly. Dewatering of these borrow pits could impact the sustainability of the water supply to surrounding communities. However, due to the expected shallow nature and the limited extent of the borrow pits, and the proposed 100 m buffer zone between borrow pits and any surrounding community activities, it is expected that dewatering of the borrow pits will not have a notable impact on the sustainability of the water supply volumes of the surrounding communities.</p> <p>On closure, natural drainage will be restored.</p>	<p>1. Borrow pit management plan</p>
<p>Resource Efficiency (Energy Use)</p>	<p>The Project currently relies on the use of diesel generators for energy needs.</p> <p>In 2023, the project reportedly utilized 1,044,920 litres of diesel and 241,759 litres of gasoline.</p> <p>Energy conservation and efficiency plans are yet to be developed and implemented.</p>	<p>1. Fuel_Diesel supplies June_Nove 2023</p>
<p>Pollution Prevention (Waste)</p>	<p>Project waste streams currently include domestic waste, raw organic waste, general waste, hazardous waste, wood waste, and metal scrap. Handling and storage of waste materials are conducted according to the waste management plan (WMP) including onsite segregation and sorting.</p>	<p>1. Waste management plan</p>

PS3 / OS3 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>Designated waste bins are provided at the campsite and active worksites along the railway route.</p> <p>Wood waste and scrap metals are sold off to community members while other waste streams are disposed of and managed by Vista Environmental Reclamation Services, a registered third-party waste management vendor.</p> <p>Records of disposed waste quantities (estimates) are kept by the Contractor.</p> <p>Accumulation of litter in drainage ditches along the rail embankment will need to be monitored and removed on a regular basis during the operational phase. This needs to be specified in the waste management plan.</p>	
Pollution (Effluent) Prevention	<p>Wastewater production will be prevented or reduced where possible. At the site camp water saving devices will be implemented, wastewater will be recycled, and contamination will be controlled at the source. Wastewater will be treated in a wastewater treatment plant (WWTP) in a way that takes into account the source characteristics, and discharge requirements.</p> <p>At quarries wastewater will be recycled back into the system.</p> <p>Sewage and liquid sanitary wastewater from the construction camps and accommodation areas are channelled into septic tanks and disposed of by a third-party vendor. The Contractor is yet to determine the accreditation status, competence and capacity of the sewage management vendor, to confirm safe disposal practices are followed.</p>	1. Wastewater management plan
Pollution (Hazardous Waste) Prevention	<p>Hazardous wastes, such as oily rags, lubricants, paints, etc., are segregated on-site and disposed of by the registered waste management vendor.</p> <p>The Contractor maintains records of disposed hazardous waste volumes and quantities.</p>	1. Hazardous materials management plan

PS3 / OS3 Requirements and Guiding Questions	Current Status	Documents Reviewed
Pollution Prevention (Soil and Groundwater)	<p>A soil management plan is in place and being implemented. No evidence of the spill response plan was provided in order to link spill response to the soil management plan.</p> <p>Localized oil spills were observed in the bulk storage area for diesel fuel at Kazaure camp. In addition, damage to the bund wall that could reduce efficiency of the bunded area at the fuel dump were noted.</p> <p>The borrow pit management plan indicates that the aquifer depth will be assessed at all borrow pits. Where possible, the floor elevation of the borrow pit will be maintained above the groundwater level, which will mitigate contamination of the aquifers.</p> <p>The presence of sediments in surface water runoff will be limited by using sand traps or sediment ponds.</p> <p>Refuelling and vehicle maintenance, and hazardous waste and material will storage, will only be done designated areas.</p>	<ol style="list-style-type: none"> <li>1. Soil management plan</li> <li>2. Borrow pit management plan</li> </ol>
Greenhouse Gas Emissions	Discussed under PS1, so not duplicated here.	
Climate Change Risk	Discussed under PS1, so not duplicated here.	
Pesticide Management	Management of Alien Invasive Species, as indicated in the Biodiversity Management Plan (BMP) does allow for the use of herbicides. If such are to be used, a corresponding pesticide management procedure needs to be compiled, cross-referenced with both the BMP and hazardous waste management plan.	<ol style="list-style-type: none"> <li>1. Construction Biodiversity Management Plan;</li> <li>2. MENG-EM-PLN-00001541-REV0   02/10/2023</li> </ol>

#### 4.2.4 IFC PS4 – COMMUNITY HEALTH, SAFETY AND SECURITY

#### AFDB OS 4 (OS4): COMMUNITY HEALTH, SAFETY AND SECURITY

PS4 / OS4 Requirements and Guiding Questions	Current Status	Documents Reviewed
Community Health and Safety	<p>The Contractor has a Social and Community Sustainability Plan which provides details of the social management and mitigation including community health, safety and security, to be implemented during the construction phase of the project. The document indicates the Contractor’s commitment to identifying, analysing and mitigating all project activities that involve safety to the public or community, including, but not limited to:</p> <ul style="list-style-type: none"> <li>• limit community exposure to hazardous materials,</li> <li>• display prominent signages,</li> <li>• develop dedicated pathways to allow safe passage around construction activities,</li> <li>• manage construction sites that may negatively impact on community safety including site maintenance, and</li> <li>• marking excavation, trenches, ditches and sloping correctly to prevent drowning, entrapment or harm.</li> </ul> <p>The Contractor also has an ESMP in place. However, verbal claims by the community members indicated that many of these plans have not been adequately communicated to the community members; Signages about access roads and crossings along the project’s RoW were reported to be inadequate. Some road accidents have been recorded involving community members.</p> <p>Communities around the Kunchi quarry site in Katsina State reported that blasting of the rocks is carried out without prior notice to them. This is contrary to the plan to notify communities within 100m reach before such activities as indicated in the ESIA Impact</p>	<ol style="list-style-type: none"> <li>1. Contractor Social and Community Sustainability Plan;</li> <li>2. ESIA Preliminary Early works on ESMP (Dawanau to Kazaure Section); and</li> <li>3. ESIA Impact Assessment Chapter.</li> </ol>



PS4 / OS4 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>Assessment Chapter; according to the local communities, vibrations from activities at the quarry site cause cracks in their residential houses, and that noise and air pollution have become common experiences for them. The quarry site also affected their water point for their cattle. In response, the Contractor provided a borehole, which community members said is inadequate. Similar to people around the quarry site, residents of other PACs also complained about dust and excessive speeding by the Contractor’s drivers. A formal grievance process on this issue is in place, and existing mitigation for dust emission involves spraying water along the untarred roads leading to the various worksites and facilities. However, this measure appears inadequate due to low frequency of spraying and the relatively high temperatures in the north causing quick evaporation.</p> <p>At the Kunchi quarry, the Contractor has provided access for community members to fetch water from a partly below-ground 10,000 litre water tank. The users, mainly children from the communities, stand on top of the tank to fetch water using bailers tied to ropes. Environmental Accord observed that the process of fetching water from this tank could pose a drowning risk to the users (photograph 35).</p>	
Emergency Preparedness and Response	<p>The Contractor has an Emergency and Response plan with clear procedures and delineation of responsibilities, and with focus on identifying, assessing, and providing basic emergency response information and recommendations. The plan covers such emergencies as Medical Emergency, Fire Emergency, environmental emergency, evacuation, incidents, accidents and hazards.</p> <p>The Contractor conducts regular security mock drills for the different types of emergencies to test response capabilities, evaluates and trains personnel in emergency preparedness and response with documented evidence.; Emergency contacts numbers and personnel/offices are also available at the camp site.</p>	<ol style="list-style-type: none"> <li>1. -Emergency and Preparedness Plan;</li> <li>2. -Emergency Contacts;</li> <li>3. -Response Procedure;</li> </ol>

PS4 / OS4 Requirements and Guiding Questions	Current Status	Documents Reviewed
Security Management	<p>The Contractor has a private Security Unit (unarmed) that is headed by a Security Manager with over 30 years of relevant experience who is assisted by a Deputy Security Manager. These two are supported by GardaWorld Security, a leading private security firm with licence to engage the Military, the Police and the Nigerian Security and Civil Defence Corps in the event of escalated armed security situations. These work together to provide security for the project. They are also assisted by a local security organisation (CEFO) that helps to interface with the communities.</p> <p>The Contractor reports that a robust security management plan is in place, but this was not made available because of its sensitivity. A security risk assessment is routinely conducted based on the reports of the Department of State Security Service and the Contractor’s daily, weekly and monthly security reports; Reportedly, the report details areas of low, moderate and high security risks and advises the project accordingly.</p> <p>On-site interviews with the Security managers reveal that banditry is the major security threat in parts of the project states and that there has been no major security incident because of the robust preventive measures in place.</p> <p>There are also regular training sessions for guards to improve surveillance, skills and security awareness of the guards to minimize security risks and threats. In addition, security personnel are trained on the following modules:</p> <ul style="list-style-type: none"> <li>• Code of business ethics including human rights;</li> <li>• Security roles &amp; responsibilities;</li> <li>• Cultural awareness;</li> <li>• Radio communications;</li> <li>• Voluntary Principles on Security and Human Rights (VPSHR);</li> <li>• Core competency;</li> <li>• Security awareness; and</li> <li>• Improvised Explosive Device (I.E.D) Awareness.</li> </ul>	<ol style="list-style-type: none"> <li>1. -ESIA Preliminary Early works on ESMP (Dawanau to Kazaure Section);</li> <li>2. -Mock Drill Report;</li> <li>3. -Security Operations Management Plan;</li> <li>4. SOP Security Plan;</li> <li>5. Security Threat Report;</li> <li>6. Letter of contract with the Police;</li> <li>7. Letter of contract with NSCDC;</li> <li>8. Security Code of Conduct Guideline; and</li> <li>9. Contractor’s Africa Security Services for the Kano-Maradi Railway Project -TECHNICAL PROPOSAL</li> </ol>

PS4 / OS4 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>The security compliment of the Contractor includes women. There were no reports of human rights abuses by the Contractor security personnel.</p>	



## 4.2.5 IFC PS5 – LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

### AFDB OS 5 (OS5): LAND ACQUISITION, RESTRICTIONS ON ACCESS TO LAND AND LAND USE, AND INVOLUNTARY RESETTLEMENT

PS5/ OS5/OS7/OS10 Requirements and Guiding Questions	Current Status	Documents Reviewed
Project Design	<p>A detailed project description has been developed for the project. The description also includes detailed project alternatives investigated, and measures adopted to decrease displacement impacts such as:</p> <ul style="list-style-type: none"> <li>• Realignment of the route to avoid densely populated areas,</li> <li>• Reduction of the right of way corridor from 200 m to 100 m, and 65 m in sensitive areas, and</li> <li>• Reduction in the land size designated for the train stations and maintenance depots.</li> </ul> <p>The project design also took into consideration the issues, concerns and recommendations of the stakeholders and project design dedicated meetings held with stakeholders.</p>	Kano To Maradi Rail, Nigeria, and Republic of Niger-ESIA: Chapter 1 - 4
Compensation and Benefits for Displaced Persons	<p>The review of the supplementary RAP/LRP report refers only to the Nigerian valuation standards as the base for valuing the PAP assets. FMoT appointed multiple estate valuers and surveyors to enumerate, assess, and to disburse cash compensation to PAPs for the loss of land and economic assets. To date, PAPs in six sections (five in Nigeria) of the route have received their cash compensation, as well as those affected by train stations and camp sites.</p> <p>FMoT structured compensation as per the provisions of the Land Use Act, therefore, Government approved compensation rates were used and cash compensation was paid to PAPs for improvements on the land and not for the loss of land. In addition, it has been reported that PAPs whose land was fallow at the time of the valuation did not receive any</p>	Kano-Maradi Final RAP Section 1 and Supplementary RAP

PS5/ OS5/OS7/OS10 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>compensation. The overall compensation process has resulted in high levels of dissatisfaction among PAPs and many of whom have logged complaints with the village heads. In some cases, PAPs have refused to collect their cheques pending the resolution of their grievances.</p> <p>Other grievances related to cash compensation were reported, including perceptions of assets being undervalued, low compensation received, and some PAPs indicated that they have not received any cash compensation even though they lost land and assets to the project. In the Sandamu Local Government Area in Katsina State, it has been reported that there were instances where cash compensation was not paid directly to PAPs resulting in community leaders redistributing the community compensation.</p> <p>Allowances are not included in the entitlement matrix; therefore, it is unclear which group of eligible persons will receive an allowance or additional support.</p>	
<p>Community Engagement (OS10): Stakeholder Engagement and Information Disclosure</p>	<p>Community engagement is a shared responsibility of the FMoT, local governments and the Contractor. However, discussions with the Community Liaison Officer (CLO) revealed that the Contractor does not directly engage with local governments, even though at meetings, it is important for a unified stakeholder engagement approach. The Contractor's engagement with the communities is said to be through the FMoT who is responsible for land acquisition, asset enumeration, valuation, and compensation. Representatives from FMoT, along with the CLOs and other personnel attend all meetings with stakeholders. Resettlement stakeholder consultations began during the project planning phase and expanded to include discussions on project design, realignment, information sessions preceding negotiations, census data collection, compensation sensitization, compensation disbursement, land acquisition, asset exhumation, site inspections, pre-construction information sessions, and land entry. In 2023, approximately 91 stakeholder engagement meetings were conducted, with an additional 17 meetings held as of 2024 involving the communities.</p>	<ol style="list-style-type: none"> <li>1. Stakeholders Engagement Register</li> <li>2. Stakeholder Engagement Plan - Kano-Maradi Single Track Standard Gauge Railway Line 10001-NIG.KAMA- MENG-SU-PLN-000857 - Rev00   Date:23/02/2023 ;</li> <li>3. Kano-Maradi Final RAP Section 1 and Supplementary RAP</li> </ol>

PS5/ OS5/OS7/OS10 Requirements and Guiding Questions	Current Status	Documents Reviewed
<p>Grievance Management (OS10): Stakeholder Engagement and Information Disclosure</p>	<p>The RAP/LRP documents clearly outline the grievance redress mechanism and institutional roles and responsibilities. It further advocates for the establishment of grievance redress committee.</p> <p>The FMoT manages all grievances related to land acquisition and compensation, whilst the Contractor records and manages construction related grievances.</p> <p>Interactions with the communities during the field activities indicated that the communities were aware of the project and were involved in the land acquisition processes. There were, however, conflicting views about the existence of any Grievance Redress Committee. While the Contractor, FMoT and a few stakeholders reported that this exists, many PAPs claimed ignorance of the committee and channels for lodging land acquisition and compensation grievances. Some traditional leaders have been receiving a significant number of grievances from PAPs and they are unsure of where to direct the received grievances.</p> <p>As of 2023, the Contractor documented 11 grievances, of which four had been resolved at the time of the site visit, while seven were pending resolution. Most of the grievances pertained to construction activities such as blasting, borrow pit backfill, excessive dust emission, soil dumped on agricultural land, embankment on graveyards, compensation for road damage, among others.</p> <p>Overall, the implementation of the grievance redress mechanism by FMoT is lacking and it appears that there are no grievance officers from government that have been deployed to PACs.</p>	<ol style="list-style-type: none"> <li>1. Grievance Register 2023</li> <li>2. Grievance Register 2024</li> <li>3. Grievance Management Procedure</li> <li>4. Kano-Maradi Final RAP Section 1 and Supplementary RAP</li> </ol>
<p>Resettlement and Livelihood Restoration Planning and Implementation</p>	<p>A zone lotting approach will be adopted for the project implementation and the route has been broken into nine sections. Two resettlement plans have been provided for the ESDD; i.e., the Draft Supplementary RAP/LRP, February 2024, which includes the entire railway line (393km), and the RAP/LRP for Section 1 of the route (Kano to Dawanau) in Nigeria, July 2022.</p>	<ol style="list-style-type: none"> <li>1. Kano-Maradi Final RAP Section 1 and Supplementary RAP</li> </ol>

PS5/ OS5/OS7/OS10 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>As it stands, it is unclear which RAP/LRP is being implemented in Nigeria whereby PAPs in six sections of the route have been paid compensation.</p> <p><b>Notable observations:</b></p> <p>Overall, both RAP/LRP documents indicate that they seek to align with good international industry practice standards (GIIP); however, both documents mostly do not follow these standards, particularly in application of the most stringent provisions between national legislation and GIIP.</p> <p>The Section 1 RAP/LRP was adapted into the Supplementary RAP/LRP document, which is evident when reviewing the Chapters 7 compensation framework, eligibility, and entitlements. For instance, Section 7.4 on the establishment of a cut-off date states that the cut-off date was widely publicised via television- Nigerian Television Authority (NTA), radio (Liberty Radio 103.3 FM), and communicated with traditional leaders in project affected communities (PACs). However, the television and radio broadcasters are found in Nigeria and not in Niger. Therefore, there is no evidence of the establishment of the cut-off date to PACs and PAPs in Niger.</p> <p>Section 7.5 Project Approach to compensation states that cash compensation for impacted assets is calculated in the local currency, “Naira ₦ or NGN” for Nigeria, and “West African CFA Franc” for Niger, taking into consideration inflation rates given the economic contexts in both Niger and Nigeria. However, in Chapter 11: Implementation Arrangements and Budget, the currency used for all costings is presented in Naira.</p> <p><b>Other findings:</b></p> <p>The RAP/LRP documents do not mention provision of replacement land. The RAP is also silent on how cases of PAPs who lose &gt;50% or more land will be assisted.</p> <p>In the legal framework gap analysis, some of the project’s strategies to address legislative gaps are vague and do not speak to the relevant sections of the RAP/LRP document such</p>	



PS5/ OS5/OS7/OS10 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>those related to the LRP – the project’s strategy to bridge the legislative gap states “Livelihood restoration measures will be put in place for vulnerable persons”. This statement is the opposite of the details provided in the LRP chapter whereby all PAPs whose livelihoods are disturbed by the project will participate in the LRP and not just vulnerable persons. As such, alignment of the different sections of the RAP/LRP documents is required.</p> <p>Both RAP/LRP documents present implementation schedules, however, the timelines provided are unrealistic considering that the land acquisition process will be completed in sections; therefore, this should be reflected in the schedule. It does not make provisions for the period land evacuations, timing when PAPs will be allowed harvest standing crops, implementation of the LRP, compliance monitoring review, among others.</p> <p>Due to the land acquisition process being undertaken in compliance with national standards, i.e., Land Use Act, no provisions have been made in the RAP/LRP documents for replacement land, host communities, considerations for PAPs who lose 50% or more of their land, vulnerable persons, among others.</p>	
Physical Displacement	<p>The RAP/LRP is silent on loss of access to land, but it focuses on the loss of structures, crops, and trees. This is a major gap in the documents as it cannot be clearly determined whether some PAPs did lose 100% of their occupied land or 10%, and how the different percentages lost will be compensated for and if there are venerable persons among such PAPs, etc. Also, the RAP/LRP report is silent on the availability of land for PAPs to purchase, the market conditions for purchasing land and construction. Even though land losses are not included in the RAP/LRP documents, this is likely to occur especially in areas where the railway stations will be constructed.</p> <p>The Project will result in the loss of 12,695 houses and 2,064 losses of complementary assets. The house losses apply to sections 1,2,3,4,5 and 9 (the valuations for sections 7 and 8 are still ongoing). Information from the site visits did not indicate physical resettlement for the sections already covered. However, it is uncertain if the remaining</p>	<ol style="list-style-type: none"> <li>1. Kano-Maradi Final RAP Section 1 and Supplementary RAP</li> </ol>



PS5/ OS5/OS7/OS10 Requirements and Guiding Questions	Current Status	Documents Reviewed
	sections (i.e. 6 and 7) will involve physical resettlement as asset valuations are still ongoing.	
Economic Displacement	<p>Economic displacement impacts will be significant along the extent of the route. Payment of cash compensation for the loss of improvements on the land has been paid for sections 2,3,4,5, and 9 of the Project, while only partly paid for section 8, and there is significant dissatisfaction with the compensation received. No compensation has been paid for section 1, and asset valuation for sections 6 and 7 is still ongoing.</p> <p>The Supplementary RAP Report indicates that 19,238 persons will be economically displaced.</p> <p>The RAP/LRP for Niger is still in progress and the RAP/LRP implementation in Nigeria is underway with a focus on payment of compensation to PAPs.</p>	1. Kano-Maradi Final RAP Section 1 and Supplementary RAP
Vulnerability (OS7): Vulnerable Groups	The RAP/LRP documents identify vulnerable persons in a more generic manner (female headed households, aged and elderly persons, low-income households, orphans, people living with disabilities, people living with ill-health, indigent households, households with large numbers of dependents and households headed by people living with disability) and does not consider multi-dimensional vulnerabilities of PAPs. Considering the misalignment of the RAP/LRP with international standards, the project is likely to result in more PAPs being vulnerable.	1. Kano-Maradi Final RAP Section 1 and Supplementary RAP
Private Sector Responsibilities under Government Managed Resettlement	Discussions with the project Contractor revealed that all land acquisition and resettlement related matters are the sole responsibility of the FMoT, a government ministry.	1. Kano-Maradi Final RAP Section 1 and Supplementary RAP



#### 4.2.6 IFC PS6 – BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES;

#### AFDB OS 6 (OS6): HABITAT AND BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

PS6 Requirements and Guiding Questions	/OS6 and	Current Status	Documents Reviewed
Protection and Conservation of Biodiversity (General)	and of	<p>Baseline Survey reports, as undertaken in 2021, were not available for review, only a supplementary biodiversity baseline report that incorporated secondary data and a more detailed screening for Critical Habitat. As such, only a high-level overview of species present and a list of historically recorded threatened species (extracted from IBAT) has been presented, but not the full lists of species actually observed during the surveys.</p> <p>Two main habitat types have been recorded, being tropical grassland and shrubland, which are components of the West Sudanian savannah. It has been noted in the baseline that “significant degradation of the habitats in and around the Project AoI have been caused by the conversion of land to agriculture, the grazing of livestock, deforestation and charcoal production”.</p> <p>Overall, the impacts are well assessed, with habitat fragmentation, loss of individuals of threatened tree species and potential continued degradation of adjacent habitats the key concerns, but with mitigation proposed, residual impacts can be significantly reduced.</p> <p><u>Notes on the ESIA:</u></p> <p>It has been noted that the biodiversity sampling protocol in Niger followed a pre-determined distance rather than the targeting of specific habitats as done for Nigeria. Further, in Niger only a dry-season survey could be conducted. Whilst in Nigeria only a wet-season survey was done. Overall, thus, it can be accepted that current knowledge on biodiversity in Niger is somewhat under-represented.</p> <ul style="list-style-type: none"> <li>◦ The above has been taken into consideration in the BMP with the pre-clearance checklist to be completed.</li> </ul> <p>Whilst two habitat types have been described on a very high level, it is clear that there are also wetland and riparian habitats associated with ephemeral, seasonal and perennial drainage</p>	<ol style="list-style-type: none"> <li>1. III.B.4 route screening update</li> <li>2. 2023_Kano_Maradi_ESIA Report (Final): 03 Project Description</li> <li>3. Final ESIA Technical Annex F: Water Resources</li> <li>4. Final ESIA Technical Annex G: Biodiversity</li> <li>5. Biodiversity management plan</li> <li>6. SKonica Min24032111370</li> <li>7. SKonica Min24032111380</li> <li>8. SKonica Min24032111401</li> </ol>

PS6 Requirements and Guiding Questions	/OS6 and Current Status	Documents Reviewed
	<p>lines/rivers (about 80 being crossed by the rail) and ponds. Several of these wetland habitats are delineated as forest reserves, showing their ecological and ecosystem services importance within the wider semi-arid region.</p> <ul style="list-style-type: none"> <li>◦ These habitats are merely described as 'aquatic habitats', mapped in the Technical Annex F: Water Resources, but no further information on species typically associated with such – especially in their more natural state – was provided. Except the mapping of rivers, no delineation of mapping of the extent of associated floodplain wetlands has been provided/undertaken. Although such wetlands are mostly modified to cultivated lands, recognising and maintaining their ecosystem functionality by sufficient drainage (subsurface or other) will be important to retain their current agronomic productivity.</li> <li>◦ Most likely, this oversight of wetland ecosystems is due to limited soil sampling, which would have shown the typical mottling characteristics of inundation – albeit only seasonal or ephemeral. very often in seasonal wetlands, such are not readily recognised without focused investigation.</li> </ul> <p>Plant species reported on in the biodiversity baseline are limited to common and threatened species, of which most are trees. However, in the Project description as well as the rehabilitation plan, the use of vegetated swales on all embankments, lining stormwater drains is indicated, using a mixture of native grasses.</p> <ul style="list-style-type: none"> <li>◦ Although the herbaceous and geophytic component of the vegetation may vary interannually due to timing and amount of rainfall, a full list of plant species for the various habitats needs to be provided to be able to set goals for rehabilitation and to monitor no net loss measure implemented (as discussed later in this section).</li> <li>◦ It is not clear if a vegetation cover will be used for the long-term stabilisation of sloped embankments and transition zones under bridges), but it would be advisable to seek another alternative to stabilise slopes under bridges, as native grasses are adapted to a high-light environment and are anticipated to perform poorly under more shaded conditions under the bridges.</li> </ul>	

PS6 Requirements and Guiding Questions	/OS6 and Current Status	Documents Reviewed
	<p>Following information contained in the route screening and with the RAP not yet finalised, it is noted that potentially 1844 ha of replacement farmland will be required, with an additional 115 ha for replacement settlements. No information has been provided on where this 'replacement land' will be, and thus RAP-associated impacts on biodiversity (and ecosystem services) could not and were not yet assessed.</p> <p>As documented in the impact assessment 'The occasional presence of the baobab, <i>Adansonia digitata</i> has been noted. Within the prevailing environment and elevated by the large extent of modification/degradation of natural habitats, undoubtedly would be a keystone species<sup>1</sup>, and clearance of such trees, as well as the reduction of seasonal runoff that keeps these trees alive would need to be avoided at all costs.'</p> <ul style="list-style-type: none"> <li>◦ Site visit observations revealed that the baobab, <i>Adansonia digitata</i> is highly abundant and widespread across the project States, including along the direct project footprint.</li> <li>◦ Its abundance and versatility (for medicines, fiber and other non-timber uses) make it an invaluable asset to tribes not only in northern Nigeria but throughout Africa. The conservation status of this species remains undetermined, as it is yet to be evaluated against the International Union of Conservation of Nature (IUCN) Red List criteria. The BMP and biodiversity baseline only acknowledges the importance of these trees as potential vulture roosting/breeding sites and as such advises on avoiding work near such trees, but does not expressly recognize its wider importance and need to retain these trees.</li> </ul> <p>Following the initial and supplemental ESIA, ESMPs, a biodiversity management plan (BMP) has been developed. The Contractor needs to conduct a biodiversity risk analysis and control assessment based on the biodiversity plan using a mitigation measure checklist.</p>	

<sup>1</sup> Keystone species are those species whose importance to an ecosystem's structure, composition, and function is disproportionately large relative to their abundance. These species can be of any life form, but they have in common an effect on their environment that is always greater than what can be expected based on their biomass (source: <https://www.oxfordreference.com/>)

PS6 Requirements and Guiding Questions	/OS6 and Current Status	Documents Reviewed
	<p><u>Notes on the BMP:</u></p> <p>The BMP cross-references other management plans such as the waste-water-, soil and spill-response plan. However, those management plans show no linkage/cross-reference to the BMP, which is of most significant concern for potential spills of hydrocarbons or other significant pollutants.</p> <p>A detailed pre-clearance procedure and injured wildlife protocol has been provided. However, the overall BMP needs to specify that all excavations need to be protected to avoid access to fauna, and checked every morning prior to the resumption of any activity to enable the flushing of fauna or timely relocation of potentially trapped fauna from such sites.</p> <p>The BMP does provide for a section on rehabilitation and revegetation, but the detail of preferential species to be used and where, e.g. which grasses for erosion control on which embankments, priority species for reinstating riparian areas (currently only indicated as 'vegetated strips' adjacent to rivers), etc, is lacking. Due to the semi-arid nature of the project area, variable rainfalls and thus potential challenges with revegetation success, more detail is required to optimise planned nursery operations and facilitate rehabilitation success.</p> <ul style="list-style-type: none"> <li>◦ Without the full list of plant species recorded in natural/near natural habitats, the most appropriate selection of species to be used in re-vegetation of rail embankments, drainage lines nor re-instatement of riparian areas cannot be known. At the same time, revegetation success cannot be measured if rehabilitation targets cannot be set.</li> <li>◦ A note on vegetated sloped embankments: It would benefit the establishment and long-term stability of vegetation if some form of surface roughness can be incorporated into the slopes to prevent accelerated runoff, especially after longer periods of drought.</li> </ul> <p>The BMP specifies no collection of firewood, but does not specifically address that open fires for cooking by project staff also need to be strictly limited to specifically designated safe areas to do so.</p>	

PS6 Requirements and Guiding Questions / OS6 and	Current Status	Documents Reviewed
	<p>Monitoring protocols specifically relating to rehabilitation works as well as enabling the quantification of no net loss actions is vague.</p> <ul style="list-style-type: none"> <li>◦ Again, no measurable goals can be set or monitored without more information of what a typical and desirable final vegetation species composition will look like, as that information is not contained in the baseline available for review.</li> <li>◦ Some monitoring protocols may change for the operational phase, whilst others will be continued. This will need to be specified in the BMP, e.g. routine monitoring of erosion of all rail embankments and drainages installed, especially downstream of box and pipe-culverts. Additional inspections of embankments and drainage structures for stability and erosion will need to be conducted after occasional heavy rainfall events.</li> </ul> <p>No monitoring protocols for spillage response and post-spillage recovery regarding biodiversity has been provided – this should be developed at least for streams and ponds (perennial, seasonal or ephemeral).</p>	
<p>Management of Ecosystem Services (Appropriate Impact and Risk Assessment)</p>	<p>An ecosystem services assessment was conducted as part of the ESIA studies. The identified ecosystem services were classified (provisioning, regulating, and cultural) and focused on services provided by tropical grassland, shrubland and water bodies.</p> <p>Priority ecosystem services identified were: Water for drinking, domestic use and livestock from surface- and ground water resources; arable soils and water for the production of crops; wood for fuelwood and charcoal; provision of sand, gravel and ballast (for the project); cultural sites, which include deities and spiritual values associated with rivers.</p> <p>Project activities were assessed to have low, medium and high impacts on ecosystem services. However, with the diligent application of mitigation measures proposed, residual impacts were assessed to be low.</p> <p>The BMP prioritises mitigation aimed at clearing as little natural vegetation and especially large indigenous trees as possible, whilst also providing sufficient structures to allow continued free</p>	<ol style="list-style-type: none"> <li>1. 2023_Kano_Maradi_ESIA Report (Final)</li> <li>2. 2023_Kano_Maradi_ESIA Report (Final): 03 Project Description</li> <li>3. Final ESIA Technical Annex G: Biodiversity</li> <li>4. Biodiversity management plan</li> <li>5. Soil management plan</li> </ol>

PS6 Requirements and Guiding Questions	/OS6 and Current Status	Documents Reviewed
	<p>movement of water across the rail servitude and associated access roads to retain natural replenishment of water resources.</p> <p>According to the BMP and amplified in the Project description, design principles and placement of bridges over rivers, as well as pipe and box culverts follow best practice, with bridges spanning the width of rivers, whilst box- and pipe culverts are said to be fitted with downstream flood and erosion protection, either with rip-rap outlet protection immediately downstream of the concrete apron, or supplemented by dissipators or reno mattresses.</p> <p>It has been noted in the Project Design (Table 3-14) that it is recommended that felled vegetation will be discarded to landfills. This is contradictory to the soil management plan and BMP, where it is recommended that felled vegetation, especially wood, be used for erosion control or donated to communities for firewood. The latter would be the preferred option, and ever cleared herbaceous or shrubby vegetation can be applied as mulch at construction areas to prevent soil erosion, suppress dust, create temporary faunal barriers and be used to facilitate revegetation, rather than filling up landfills. This slight inconsistency can be updated.</p> <p>As indicated in the above section, the only risk to ecosystem services will be poor re-instatement of riparian areas and poor performance of no-net-loss measures. With the current lack of more detail on natural species compositions of such habitats, progress towards rehabilitation and no-net-loss by enhancement of degraded areas cannot be measured.</p>	
Protection and Conservation of Biodiversity (Modified, Natural, and Critical Habitats)	<p>A 2021 land acquisition and biodiversity risk screening study of the project reports that the current railway route will directly impact seven forest reserves and could indirectly impact 10 other forest reserves in Nigeria.</p> <p>The study further submits that the potential that Critical Habitat (CH) would be triggered is considered medium and that risks and impacts to biodiversity are expected to be managed through standard mitigation measures.</p>	<ol style="list-style-type: none"> <li>1. MEA Nigeria KM railway land and biodiversity route screening updated 24052021</li> <li>2. 2023_Kano_Maradi_ESIA Report (Final): 07 Baseline Summary</li> </ol>



PS6 Requirements and Guiding Questions	/OS6 and Current Status	Documents Reviewed
	<p>The only species for which potential CH has been indicated on a precautionary principle is the Endangered and Endemic African Spurred Tortoise (<i>Centrochelys sulcata</i>). No information is provided on the preferred habitat of this species (except that riparian habitat may be suitable), nor preferred food plants for this species, which is further complicated by the apparent lack of detailed lists of vegetation composition, which makes it difficult to determine, predict or map potential preferential habitats other than the approximate modelled distribution of this species as derived from IBAT. Further, the BMP does not make specific mention of or monitoring for this species, other than indicating the need for a pre-construction survey and relocation where necessary, as well as prohibiting bushmeat collection by staff. Whilst drainage structures should be sufficient to facilitate the movement of this species across the rail, prioritising opportunistic sightings of this and other threatened fauna species together with locality for more detailed habitat investigations could contribute to more meaningful and measurable no-net-loss activities.</p> <p>The biodiversity baseline report indicates that habitat maps have been developed, but these were not included in the respective report-annexes, nor were provided separately. Such maps, including the locality of sensitive biodiversity sites/areas need to be included in the BMP to enable project staff a rapid reference on the potential presence of sensitive biodiversity receptors relative to where they are active.</p> <p>As indicated in above section, without more detailed information on actual species composition and species to be used for rehabilitation and no-net-loss activities, the efficiency of conservation actions over time cannot be verified.</p>	<ol style="list-style-type: none"> <li>3. Final ESIA Technical Annex G: Biodiversity</li> <li>4. Biodiversity management plan</li> </ol>
<p>Protection and Conservation of Biodiversity (Protected Areas)</p>	<p>As indicated above, several forest reserves will be directly and more potentially indirectly impacted. A summary of identified forest reserves along the project route is presented in Technical Annex G (Table G3-1). These are mapped in the water resources report (Annex F). Important to note is that the railway line will directly cross the following forest reserves:</p>	<ol style="list-style-type: none"> <li>1. 20240313 NIG_KAMA_FM_2024_1498 - Forest Reserves Affected by the Project</li> </ol>

PS6 Requirements and Guiding Questions	/OS6 and Current Status	Documents Reviewed
	<p>Dutsin Kuba just east of Tsamga. This reserve is largely modified to cultivated fields, but the rail cuts through a section of disturbed woodland;</p> <p>Nasarawa north-west of Katsina, which appears 100% modified to cultivated land;</p> <p>Damangu west of Mashi, of which about half of the impacted area appears cultivated;</p> <p>Daura west of Gurjiya, where smaller apparent natural but disturbed habitats will be impacted;</p> <p>Gwiwa Korel, of which the eastern fringe will be severed. However, in this case the rail may form a barrier to further urban encroachment into the woodlands more prevalent west of the rail alignment;</p> <p>Gasartani west of Galoru – most of this reserve is modified, but is part of a historical floodplain wetland; and</p> <p>Shakwadina west of Duru – although almost 100% cultivated, also part of a historical floodplain wetland.</p> <p>It must be noted that most of these ‘forest reserves’ have been modified to cultivated lands, likely due to seasonal moisture accumulation in these areas. Most of these forest reserves are also linked to and/or cover variable extents of seasonal or perennial wetland features. The latter has not been explored/detailed further for the forest reserves directly impacted by the railway.</p> <p>Another issue when looking at the existing maps of these forest reserves as supplied by IBAT is the mis-alignment with the apparent boundaries of protected areas as seen on Google-Earth imagery. This is beyond the scope of the Project and will not be of impact, but this is a common occurrence across Africa where original country-specific projections and/or geodetic coordinates in the delineation of protected areas were not correctly translated to the mapping of protected areas in the World Database of Protected Areas.</p> <p>The Contractor has requested (via letters dated 23 February 2022, 8 March 2022, and 13 March 2024) the status of reserve areas and requirements from the national regulators. However, the regulator has yet to respond to inquiries, but this could also be done by a suitably qualified specialist. The most important feature to determine will be the wetland characteristic of the</p>	<ol style="list-style-type: none"> <li>2. Final ESIA Technical Annex F: Water Resources</li> <li>3. Final ESIA Technical Annex G: Biodiversity</li> <li>4. NIG.KAMA.AG.2022.262 - FMoE Forest reserve annex</li> <li>5. NIG.KAMA.AG.2022.252 FmoT FMoE Forest reserve grave sites</li> <li>6. Biodiversity management plan</li> </ol>

PS6 Requirements and Guiding Questions	/OS6 and Current Status	Documents Reviewed
	<p>affected forest reserves and ensuring that beyond the bridges across the visible rivers, sufficient additional culvert and/or subsurface drainage is installed spanning the entire wetland width to ensure that subsurface or seasonal flooding across such wetlands are not impeded, as this will also significantly impact cultivation within such areas. One example where this is important is drainage required in regular distances across the entire width of the Shakwadina Forest Reserve.</p> <p>Together with local leaders, authorities and possibly NGOs, such information can be used to formulate more detailed practical, measurable and long-term sustainable no-net-loss activities (as indicated in above sections).</p>	
Protection and Conservation of Biodiversity (Invasive Species)	<p>The introduction and spread of alien invasive species during project construction phase has been assessed in the ESIA and classified as minor to negligible residual significance. The risks and impacts are expected to be managed through standard mitigation measures.</p> <p>The BMP contains a sufficiently detailed section on the control of alien invasive species, which also allows for the use of herbicide if needed. As noted under PS3, if herbicides will be used, this will require a pesticide control plan.</p> <p>It is further noted that the use of fire for controlling some species has been mentioned – however, as this could pose a risk of uncontrolled fires, the practicability of this needs to be evaluated and then clearly linked to a fire-response protocol in the emergency preparedness procedure.</p>	<ol style="list-style-type: none"> <li>1. V.A. 1.1 1620011906-RAM-RP-IA-00039_Chp08_Impact Assessment1</li> <li>2. Biodiversity management plan</li> </ol>

## 4.2.7 IFC PS7 – INDIGENOUS PEOPLE

### AFDB (OS7): VULNERABLE GROUPS

<b>PS7 Requirements and Guiding Questions</b>	<b>Current Status</b>	<b>Documents Reviewed</b>
Indigenous People	Not applicable to the project risk profile.	n/a

## 4.2.8 IFC PS8 – CULTURAL HERITAGE

### AFDB (OS8): CULTURAL HERITAGE

PS8/OS8 Requirements and Guiding Questions	Current Status	Documents Reviewed
Chance Find During Construction	<p>The Contractor has established a Chance Find Procedure which sets out the approach to be taken should any physical cultural resources be discovered (e.g. archaeological sites, historical sites, human remains, cemeteries, graves or other objects). It also has a cultural heritage management plan. Discussions with Contractor and community members indicated that the major chance finds in some parts of the project’s RoW have been graves and that these have been communicated to both the communities involved and to the Client (FMoT). As at the time of the site visit, preparations were ongoing for the Islamic exhumation of those graves.</p>	<ol style="list-style-type: none"> <li>1. ESIA Preliminary Early works on ESMP (Dawanau to Kazaure Section);</li> <li>2. Chance Finds Procedure; and</li> <li>3. Cultural Heritage Management Plan.</li> </ol>

## 5. ENVIRONMENTAL AND SOCIAL ACTION PLAN

This section summarises the specific actions to be completed to comply with the requirements of the Applicable Standards (Table 5-1). Actions are specified where:

- Information provided is insufficient in level of detail;
- Studies carried out are inadequate for the purposes of determining impact and developing mitigation measure(s);
- Gap exists between current or planned activities;
- Gap exists between current or planned activities and IFC's Performance Standard requirements;
- Proposed mitigation or management measure;
- Non-conformance was identified; and
- Significant risk exists.

TABLE 5-1 ENVIRONMENTAL AND SOCIAL ACTION PLAN

Index	Finding / Deficiency	Risk Ranking	Action Items / Recommendations	Completion Indicator	Responsibility	Completion Timeframe
PS1/OS 1-01	<p><b>EHS Legal Register</b></p> <p>The Contractor does not have a legal register or process in place to identify and effectively keep track of E&amp;S legal requirements and ensure continuous compliance with E&amp;S legal requirements.</p>	Low	Develop and maintain a legal register outlining Laws and Regulations specifying the requirements and the applicability to the construction and operation phase of the project. The legal registers will need to be updated annually to keep abreast of changing legislation and regulations and their impact on business operations in compliance with Good International Industry Practice (GIIP).	Update Legal register with E&S risks and mitigation actions.	Mota Engil	Within 3 Months of 1 <sup>st</sup> drawdown
PS1/OS 1-02	<p><b>Permits and Licences</b></p> <p>The Contractor is yet to receive EIA approval for sections within the Republic of Niger. The Contractor indicated that all work is currently halted on the Niger side, until the borders can be reopened.</p>	High	To proceed with the project, the Contractor must ensure that EIA approval is obtained from the Niger Federal Ministry of Environment for aspects of construction, including quarries, water sources and route alignments.	EIA approval from the Niger regulatory authority.	Mota Engil	TBC, but estimated time frames for approvals once the Niger border reopens, is estimated to be between 3 and 12 months.
PS1/OS 1-03	<p><b>Management Systems</b></p> <p>The adequacy and efficiency of ESMP measures could not be validated due to low and inconsistent implementation practises. For example, periodic environmental compliance monitoring has yet to commence, whereas some aspects of biodiversity management are being implemented.</p> <p>The Contractor is in the process of appointing an E&amp;S consultant for the implementation of the ESMP, however no dates have been given around this appointment.</p> <p>Findings indicate that the majority of the additional management plans and systems mentioned in EIA approval conditions are yet to be actioned and implemented. A systematic procedure or action plan for addressing design requirements as included in the conditions for EIA approval is not in place.</p>	High	<ul style="list-style-type: none"> <li>Implement a comprehensive and consistent E&amp;S monitoring and management system. This would involve establishing regular monitoring procedures to ensure that all aspects of the ESMP are being implemented effectively. The Contractor should initiate periodic environmental compliance monitoring as outlined in the ESMP and ensure that it is carried out consistently. Additionally, the Contractor should ensure that all aspects of biodiversity management, which are already being implemented, are done so consistently and in accordance with the ESMP.</li> <li>Develop and implement a systematic procedure or action plan for addressing the conditions for EIA approval. This would involve establishing a clear process to identify, prioritise, and track the implementation of the EIA approval conditions. The Contractor should review the EIA report and identify all the conditions that need to be fulfilled for approval. The Contractor should then develop a comprehensive action plan that outlines the specific steps, responsibilities, and timelines for addressing each condition.</li> </ul>	<ul style="list-style-type: none"> <li>Updated E&amp;S Monitoring system / Programme.</li> <li>Revised Action Plan.</li> <li>Proof of Appointment of E&amp;S consultant for ESMP support.</li> </ul>	Mota Engil / 3 <sup>rd</sup> Party Consultant	Within 3 months of 1 <sup>st</sup> drawdown but prior to construction works commencing in sensitive biodiversity sections, such as wetlands, river/stream crossing and protected areas.
PS1/OS 1-04	<p><b>Organisational Capacity</b></p>	Low	<ul style="list-style-type: none"> <li>Develop and implement a comprehensive E&amp;S staffing plan outlining the staff requirements, roles, responsibilities and qualifications needed to</li> </ul>	Formal Environmental and Social Staffing Plan, compliant with IFC and ILO requirements	Mota Engil	Within 3 Months of 1 <sup>st</sup> drawdown

Index	Finding / Deficiency	Risk Ranking	Action Items / Recommendations	Completion Indicator	Responsibility	Completion Timeframe
	A formal E&S staffing plan is yet to be developed.		effectively manage and implement the E&S aspects of the project. The plan should consider the specific E&S requirements and regulations applicable to the project. <ul style="list-style-type: none"> <li>The Contractor should assess the project E&amp;S needs and identify key positions and expertise required to ensure compliance with lenders E&amp;S standards.</li> </ul>			
PS1/OS 1-05	<b>Emergency preparedness and response</b> The frequency of conducting emergency mock drills (once annually) does not meet good international industry practice.	Moderate	Increase the frequency of emergency mock drills to meet or exceed good international industry practice. This would involve conducting emergency mock drills at least twice a year, as recommended by industry standards. These drills should simulate various emergency scenarios to test the effectiveness of emergency response procedures, evacuation plans, and communication protocols, this should also include community scenarios.	Updated Mock Drill Schedule	Mota Engil	Within 3 Months of 1 <sup>st</sup> drawdown
PS1/OS 1/OS10-06	<b>Stakeholder Engagement</b> Although the Contractor has identified and periodically engages with some stakeholders, including government regulators (national, state, local), and PACs, a comprehensive and well-structured stakeholder register that will ensure engagements meet planned objectives in the most effective ways is not in place.	Low	The Stakeholder Engagement Plan must be updated to include a structured stakeholder register with detailed information about each stakeholder, such as their contact information, roles, responsibilities, interests, and potential risks and opportunities associated with their involvement. The register should also include a communication plan that outlines how and when the Contractor will engage with each stakeholder.	Updated Stakeholder Engagement Plan	Mota Engil	Within 3 Months of 1 <sup>st</sup> drawdown
PS1/OS 1-07	<b>Community grievances</b> Feedback from engagement with some project-affected community members indicated that many PAPs are not aware of the grievance procedure or existing channels for reporting complaints. In addition, an anonymous means of providing feedback or reporting grievances has not been provided for the project.	Moderate	<ul style="list-style-type: none"> <li>Conduct comprehensive awareness campaigns to educate PAPs about the grievance procedure and the different channels available for reporting complaints. This can include community meetings, informational brochures, posters, and targeted outreach programmes. Ensure that the information is provided in local languages and in a culturally appropriate manner.</li> <li>To encourage open and honest feedback, create a mechanism that allows PAPs to report grievances anonymously. This can be done through a dedicated anonymous hotline, an online form, or a third-party service provider. This is to assure community members that their identities will be protected and that they will not face any reprisals for reporting grievances.</li> </ul>	<ul style="list-style-type: none"> <li>Grievance Mechanism Workshops / Awareness Campaigns.</li> <li>Anonymous Grievance Reporting Option</li> </ul>	Mota Engil	Within 3 Months of 1 <sup>st</sup> drawdown and for the duration of construction.
PS1/OS 1-08	<b>Monitoring and reporting</b>	Moderate	<ul style="list-style-type: none"> <li>The Contractor should establish a structured reporting framework that includes relevant E&amp;S indicators, project impacts, management, and</li> </ul>	Updated Stakeholder Engagement Plan (including an E&S reporting framework)	Mota Engil	Within 3 Months of 1 <sup>st</sup> drawdown



Index	Finding / Deficiency	Risk Ranking	Action Items / Recommendations	Completion Indicator	Responsibility	Completion Timeframe
	<p>External reporting is addressed in the SEP (sub-section 8.4).</p> <p><i>'MENG will keep track of commitments made (through the meeting minute) and will communicate progress made against these commitments on a regular basis (for instance during regular meetings with the community representatives).'</i></p> <p>This provision in the SEP addresses feedback to communities on reported issues or commitments but does not provide information on relevant E&amp;S indicators or project impacts, management and performance. In addition, the frequency of reporting is not stipulated</p>		<p>performance. This framework should provide clear guidelines on what information needs to be reported, how it should be measured, and the frequency of reporting. This will ensure that stakeholders are informed about the project's progress and its environmental and social performance.</p> <ul style="list-style-type: none"> <li>The Contractor should ensure that the reports include information on key E&amp;S indicators, such as environmental impact assessments, social impact assessments, and any other relevant metrics. This will provide stakeholders with a clear understanding of the project's environmental and social performance and help them assess its overall sustainability.</li> <li>The Contractor should define a specific reporting frequency, such as monthly, quarterly, or bi-annually, to ensure regular and consistent reporting. This will enable stakeholders to stay informed about the project's progress and address any concerns or issues in a timely manner. The reporting schedule should be communicated to all relevant stakeholders to set clear expectations.</li> <li>In addition, the Contractor should consider using a variety of channels to disseminate the reports effectively, i.e., electronic, stakeholder engagement meetings, etc.</li> </ul>			
PS2/OS 2-01	<p><b>Employee policies and handbook</b></p> <p>An employee handbook that provides all human resources policies and procedures is available; however, this has not been distributed to the workforce for future reference.</p>	Moderate	<ul style="list-style-type: none"> <li>Print and distribute the employee handbook to all employees including those appointed by the project sub-contractors. The handbook should in English and predominant local language.</li> </ul>	Number of (or percentage) employees that own a copy of the employee handbook.	Mota Engil	Within 1 Month of 1 <sup>st</sup> drawdown
PS2/OS 2-02	<p><b>Employment Contracts</b></p> <p>All new employees do not receive an employment letter or contract until the end of the probation period (6 months).</p>	High	<ul style="list-style-type: none"> <li>The contractor must adhere to Nigerian or Niger labour laws and International Labour Organisation (ILO) standards related to employment.</li> <li>Prepare and employment letters and contracts for all existing employees who have not signed these. Going forward, ensure that all new employees sign employment letters and contracts prior to commencing with work.</li> </ul>	All employees on site have signed employment contracts or letters.	Mota Engil	On-going
PS2/OS 2-03	<p><b>Worker Grievance redress</b></p> <p>A workforce grievance procedure for the workforce exists; however, no grievances have been lodged. Some workers know</p>	Moderate	Schedule workforce training sessions focused on sensitising the workers about the grievance procedure, how to lodge a grievance, follow-up, and final resolution. During these sessions, ensure that all workers understand that grievances can be lodged anonymously,	Fully functional workforce grievance procedure.	Mota Engil	Within 1 Months of 1 <sup>st</sup> drawdown

Index	Finding / Deficiency	Risk Ranking	Action Items / Recommendations	Completion Indicator	Responsibility	Completion Timeframe
	about its existence but do not know how to use it, whilst others do not utilise the procedure as it does not allow for anonymity. The Contractor noted that workers can raise grievances with their direct supervisor.		and ensure that the complainants will not be dismissed for raising grievances.			
PS2/OS 2-04	<b>Working Hours</b> The working hours of the employees is Monday to Friday, according to the company. However, the workforce has reported that they work seven days per week in some instances. However, work on Saturdays and Sundays is considered over time, and is optional	High	The Contractor shall comply with the Nigerian or Niger labour laws and International Labour Organisation (ILO) standards as it relates to acceptable working hours and allow the workers a choice whether they want to work on weekends or not. Once these adjustments have been made, these must be communicated with the workers.	Number of workforce engagement sessions held related to working hours.	Mota Engil	Within 3 Months of 1 <sup>st</sup> drawdown
PS2/OS 2-05	<b>Worker Rights</b> The Contractor outlines conditions for dismissal/ termination of employees in their contract letters (often due to misconduct). To date no retrenchments or mass lay-offs have been made, since the project is still in the early stages of construction.	High	Develop a retrenchment plan in accordance with requirements of the Nigerian or Niger labour law and International Labour Organisation (ILO) standards in the event of retrenchment. The plan will guide all future retrenchments.	Final retrenchment plan	Mota Engil	Within 3 Months of 1 <sup>st</sup> drawdown
PS2/OS 2-06	<b>Gender Based discrimination / violence</b> Only the corporate level GBV policy exists. Where a sexual harassment incident between two workers occurred, interviewees noted, the matter was reportedly "quietly handled" at the site level and it was not escalated.	High	The Contractor should develop clear and comprehensive policies on gender-based violence (GBV) and sexual harassment. These policies should outline what constitutes harassment, provide guidance on reporting procedures, and explain the consequences for violating the policy.  The Contractor should establish clear reporting channels for employees to report incidents of sexual harassment. This should include multiple avenues for reporting, such as reporting to supervisors, human resources, or a designated point person for GBV issues.  Implement training programs to educate employees about what constitutes sexual harassment, the importance of reporting incidents, and the procedures for doing so. Training should be provided to all employees, including supervisors and managers.  Ensure that employees who experience sexual harassment have access to support services, such as counselling and legal assistance. Provide information about these services to employees so they know where to turn for help if needed.	Gender-based violence (GBV) and sexual harassment policy for the Project.  Number of awareness training sessions held with workers.  Counselling service provider identified and available to assist victims.	Mota Engil	Within 3 Months of 1 <sup>st</sup> drawdown

Index	Finding / Deficiency	Risk Ranking	Action Items / Recommendations	Completion Indicator	Responsibility	Completion Timeframe
PS2/OS 2-07	<b>Non-discrimination policy</b> Prior to employment of workers on the project, a suite of medical tests is conducted and one of these is an HIV/AIDS test. It was noted that the Contractor relies on these medical exams to hire its workforce, however the hiring team are not able to see what specific reasons for being fit/unfit for work, which may thus lead to incorrect conclusions by the work force.	High	Review and possibly revise policies to ensure compliance with applicable laws and to promote inclusivity and non-discrimination in their hiring practices.  Provide training sessions to the workers to ensure awareness of these legal and ethical considerations.  Additionally, offering support for employees living with HIV to help create an inclusive and supportive work environment.	Final policy document on discrimination.	Mota Engil	Within 1 Month of 1 <sup>st</sup> drawdown
PS2/OS 2-07	<b>Worker representation</b> The Contractor currently engages with a worker Union. According to interviewees, they are unofficially prohibited from joining organised labour organizations or receiving organised representation. There is thus a possible disconnect between the workforce and the policies.	High	The Contractor should make workers aware of their freedom of association to join a Union if they choose to. The policies and employee employment contracts must clearly state that they adhere to Nigerian or Nigerian labour laws and International Labour Organisation (ILO) standards related to freedom of association and unionizing.	Number of workers that are registered with organised labour groups or unions.	Mota Engil	Within 1 Month of 1 <sup>st</sup> drawdown
PS3/OS 3-01	<b>Sewage waste</b> Sewage and liquid sanitary wastewater are channelled into septic tanks and disposed of by a third-party vendor for disposal. The Contractor is yet to determine the accreditation status, competence and capacity of the sewage management vendor.	Moderate	<ul style="list-style-type: none"> <li>Develop a vendor evaluation process to establish a systematic process for evaluating and monitoring the performance of the sewage management vendor. This may include regular inspections, audits or performance reviews to ensure that the vendor continues to meet required standards.</li> <li>The Contractor should request documentation from the vendor to verify their accreditation status. This may include certifications or licences from relevant regulatory authority.</li> <li>The Contractor must review the vendor's experience, qualifications, and track record in handling similar waste disposal requirements, due to the linear nature of the project.</li> <li>Assess the vendor's capacity to handle the volume of sewage and liquid sanitary wastewater generated at the project site this may include the vendor's equipment, resources, and workforce to ensure they can effectively and efficiently manage the waste disposal process.</li> </ul>	Vendor Evaluation Process	Mota Engil	Within 6 Months of 1 <sup>st</sup> drawdown
PS3/OS3-02	<b>Hazardous waste management</b> Localized oil spills were observed in the bulk storage area for diesel fuel at Kazaure camp. In addition, structural openings were noted that could compromise the efficiency	Moderate	<ul style="list-style-type: none"> <li>Implement proper maintenance and inspection procedures for the bulk storage area for diesel fuel and the bunded area at the fuel dump to identify any potential issues or damage that may reduce efficiency or lead to oil spills. In this way, maintenance or repair needs can be addressed promptly and prevent spills or leaks.</li> </ul>	Maintenance and Inspection Procedure	Mota Engil	Within 6 Months of 1 <sup>st</sup> drawdown

Index	Finding / Deficiency	Risk Ranking	Action Items / Recommendations	Completion Indicator	Responsibility	Completion Timeframe
	of the bunded area at the fuel dump were noted.		<ul style="list-style-type: none"> <li>Improve containment measures in the bulk storage area and the bunded area to prevent oil spills. This may include reinforcing the bunded area with additional barriers or liners to ensure that any spills are contained within the designated area.</li> <li>Train personnel on spill response including proper spill handling, containment measures and the use of appropriate equipment and materials for cleanup.</li> </ul>			
PS3/OS 3/OS1-03	<p><b>Resource Efficiency (Greenhouse Gas emissions)</b></p> <p>The Contractor does not have an energy conservation and efficiency plan in place.</p> <p>The contractor has not completed an CO2eq emissions inventory in terms of Scope 1 and 2.</p>	Moderate	<ul style="list-style-type: none"> <li>The Contractor should conduct an Emissions inventory and audit of the project site to identify areas of emissions sources and inefficiency. Based on the findings of the audits, the Contractor should develop a comprehensive energy conservation and efficiency plan outlining specific strategies and actions to reduce energy consumption and reduce GHG emissions, improve energy efficiency and promote sustainable practices</li> <li>In addition, the Contractor should establish clear energy reduction targets as part of the GHG reduction plan. These targets can serve as benchmarks for measuring progress and ensuring accountability.</li> </ul>	<p>Energy Conservation and Efficiency Plan</p> <p>GHG emissions reduction plan</p>	Mota Engil	Within 6 Months of 2nd drawdown, or before 3rd draw down, which ever is sooner
PS4/OS 4-04	<p><b>Community Health and Safety</b></p> <ul style="list-style-type: none"> <li>It is unclear whether the Social and Community Sustainability Plan also includes: <ul style="list-style-type: none"> <li>Risks and Hazards associated with the operational phase of the project.</li> <li>Risks and hazards associated with potential for drowning by community members or livestock through the collection of drinking water from a nearby water source.</li> <li>A comprehensive risk assessment in relation to: <ul style="list-style-type: none"> <li>communicable disease mitigation,</li> <li>influx population,</li> <li>drilling and blasting,</li> <li>provisioning and regulating ecosystems services,</li> <li>equipment &amp; infrastructure use and transportation, and</li> <li>health services infrastructure and traffic management.</li> </ul> </li> </ul> </li> </ul>	Moderate	<ul style="list-style-type: none"> <li>Ensure that the Contractor Social and Community Sustainability Plan is updated to include: <ul style="list-style-type: none"> <li>communicable disease mitigation,</li> <li>influx population,</li> <li>provisioning and regulating ecosystems services,</li> <li>equipment &amp; infrastructure use and transportation,</li> <li>Drilling and blasting,</li> <li>health services infrastructure, and</li> <li>traffic management.</li> </ul> </li> <li>The project should develop a Community Health and Safety Risk Assessment in consultation with the relevant stakeholders.</li> </ul>	<p>Updated Contractor Social and Community Sustainability Plan</p> <p>Community Health and Safety Risk Assessment</p>	Mota Engil	<p>Within 3 Months of 1<sup>st</sup> drawdown or before construction of the railway line commences in rural populated areas.</p> <p>Within 3 to 6 Months of 1<sup>st</sup> drawdown or before construction is completed in major urban, populated areas.</p>

Index	Finding / Deficiency	Risk Ranking	Action Items / Recommendations	Completion Indicator	Responsibility	Completion Timeframe
PS4/OS 4-05	<p><b>Emergency Preparedness and Response</b></p> <ul style="list-style-type: none"> <li>Whilst the Emergency Preparedness and Response plan covers emergencies such as medical emergency, fire emergency, environmental emergency, evacuation, incidents, accidents and hazards, it is unclear how the plan addresses the Project's response to emergencies that could affect the communities. It also does not include disclosure of appropriate information to affected communities, relevant government agencies and other relevant parties.</li> </ul>	High	<ul style="list-style-type: none"> <li>The emergency response plan should be revised so that it incorporates the requirements of IFC PS 4. The plan should indicate how the Project will engage in informing the host and affected communities, as well as external stakeholders about the project risks and collaborating with local communities and local government agencies to respond effectively to emergency situations especially when their participation and collaboration are necessary to respond to certain emergency situations.</li> </ul>	Revised Emergency Preparedness and Response Plan with community content	Mota Engil	Within 1 Month of 1 <sup>st</sup> drawdown
PS4/OS4-06	<p><b>Security Management</b></p> <p>Garda World Security, a leading private security firm with licence to engage the Military, the Police and the Nigerian Security and Civil Defence Corps work together to provide security for the project. They are also assisted by a local security organisation (CEFO) that helps to interface with the communities.</p> <p>Nigerian Law does not permit the arming of Private security personnel.</p> <p>Reportedly, all armed guards (military and Police) have undergone training; however no formal polices, or documents were provided on the use of reasonable force. No separate Security Risk Assessment was made available for review.</p>	Moderate	<p>Update the Security Management Plan (SMP):</p> <ul style="list-style-type: none"> <li>to include extent to which force may be used during the project construction and operational phases, including threats faced by staff at the Project site, when travelling to and from work.</li> <li>to include the role of security personnel in protecting and respecting community human rights.</li> <li>to reflect actual security practices taking place on site.</li> <li>Develop a separate Security Risk Assessment which aligns to the Security Management Plan.</li> </ul>	<p>Documents to be revised included (not limited) to the following:</p> <p>Security Operations Management Plan;</p> <p>SOP Security Plan;</p> <p>Security Threat Report;</p> <p>Security Code of Conduct Guideline;</p> <p>Contractor's Africa Security Services for the Kano-Maradi Railway Project -TECHNICAL PROPOSAL</p> <p>Security Risk Assessment</p>	Mota Engil	Within 3 Months of 1 <sup>st</sup> drawdown
PS5/OS5 01	<p><b>Compensation Rates</b></p> <p>Compensation rates for loss of structures, crops, and trees is based on government rates with no adjusted to inflation or the provisions of the Land Use Act. This has resulted in significant number of aggrieved persons. Furthermore, some PAPs' compensation was paid to unknown individuals which reflect potential unlawful behaviour in the process.</p>	High	<ul style="list-style-type: none"> <li>Update the entitlement and compensation matrix to reflect additional entitlements and compensation for PAPs, refer below.</li> <li>Review, adjust and update compensation rates and valuation reports.</li> <li>Conduct stakeholder engagement to present the updated compensation rates to PAPs and PACs.</li> <li>Payment of cash compensation to PAPs including the supplementary payment for PAPs that have received their compensation.</li> <li>Investigate incidences where cash compensation was paid to people not affected b the project whilst the</li> </ul>	<ul style="list-style-type: none"> <li>Updated entitlement and compensation matrix.</li> <li>Payment of cash compensation to PAPs.</li> <li>Completion of investigations of stolen cash compensation.</li> </ul>	Mota Engil	Within 6 Months of 1 <sup>st</sup> drawdown

Index	Finding / Deficiency	Risk Ranking	Action Items / Recommendations	Completion Indicator	Responsibility	Completion Timeframe
			impacted persons remain uncompensated for their loses.			
PS5/OS5 02	<p><b>Loss of access to land</b></p> <p>Loss of access to land is not addressed in the RAP/LRP documents, as these are developed to comply with the Land Use Act of Nigeria, which advocates for payment of compensation for improvements on the land and standing trees and crops. In addition, no considerations have been made towards replacement of land for vulnerable persons and households, nor is the percentage of land lost to the project by a household considered in relation to payable compensation. It is noted that some areas of agricultural fields and livestock grazing will be lost to the rail alignment, and the loss of this land and related compensation for this is not well understood, particularly if they were deemed to be not “productive” at the time of the RAP assessment.</p> <p>Squatters and other persons with no formal land rights are not eligible for compensation, this is a misalignment with IFC requirements. Communal resources with customary rights are also not eligible for compensation, which is non-compliant.</p>	High	<ul style="list-style-type: none"> <li>Review and update the displacement impacts identified to reflect impacts associated with the loss of land -both residential and agricultural land.</li> <li>Review and update the eligibility criteria and entitlement framework to incorporate compensation measures associated with loss of land. The revision should also pay special attention to measures to support vulnerable persons.</li> <li>Review and revise the eligibility criteria to include all persons eligible for compensation in line with the provisions of the IFC.</li> </ul>	An updated RAP/LRP	Mota Engil	Within 6 Months of 1 <sup>st</sup> drawdown
PS5/OS5 03	<p><b>Resettlement Action Plans</b></p> <p>Overall, both RAP/LRP documents indicate that they seek to align with Good international industry practice standards (GIIP), however, both documents mostly do not follow these standards particularly in application of the most stringent provisions between national legislation and GIIP. Citing the GIIP standards is not enough when these are not incorporated fully into the document.</p> <p>Furthermore, it is clear that the supplementary RAP/LRP was adapted from the Section 1 RAP/LRP because of information being similar across the documents as it relates to Nigeria, and one-</p>	Moderate	<ul style="list-style-type: none"> <li>Review and revise the entire RAP/LRP document to ensure equitable descriptions of each country’s applicable information is captured and balance across the document.</li> <li>Review and revise the RAP/LRP document to align with the provisions of the IIGPs and in cases where the project deviates from following the standards</li> </ul>	Updated RAP/LRP	Mota Engil	Within 6 Months of 1 <sup>st</sup> drawdown



Index	Finding / Deficiency	Risk Ranking	Action Items / Recommendations	Completion Indicator	Responsibility	Completion Timeframe
	line details for Niger sporadically added with the exception of the legal framework and baseline section.					
PS5/OS5 04	<b>Restoration of Livelihoods</b> The project strategies to bridge the gap between the national legislation and GIIP requirements does not match the details discussed under specific RAP/LRP documents, e.g. the project will only support the restoration of livelihood of vulnerable persons; subsequently, all PAPs will participate in the LRP. These are some of the inconsistencies found in the reports.	Moderate	Review and align the various chapters of the RAP/LRP documents and create linkages between different sections considering the final agreed principles and approaches to compensation by the developer.	Updated RAP/LRP report	Mota Engil	Within 3 Months of 1 <sup>st</sup> drawdown
PS5/OS5 05	<b>Valuation and Compensation</b> The valuation and compensation currency used are supposed to be the Naira and West African CFA Franc. However, all compensation is denoted in Naira and it is unclear if there was an agreement reached between the governments to use a single currency at some point, but the RAP/LRP documents were not updated. If this was an error, this needs to be revised in the reports, and if it intentional then this must be explained.	Moderate	<ul style="list-style-type: none"> <li>Amend valuation and compensation rates to be used to the relevant country currency.</li> <li>Reissue valuation report to PAPs for approval of the adjustments.</li> </ul>	Updated budget currencies for each country budget	Mota Engil	Within 3 Months of 1 <sup>st</sup> drawdown
PS5/OS5 06	<b>Grievance Redress Mechanisms</b> From stakeholder interviews, it is apparent that the grievance redress mechanism has not been widely publicised. Furthermore, the grievance redress committee was not established, no grievance officers were appointed, and community leaders were not sensitised about the existence of the grievance mechanism.	High	<ul style="list-style-type: none"> <li>Undertake grievance redress mechanism awareness campaign to sensitise PAPs and PACs as well as community leaders of its existence.</li> <li>Deploy grievance officers in strategic locations who will assist PAPs and PAC members to lodge grievances and follow-ups related to grievance redress.</li> <li>In each PAC, establish a grievance redress committee who will work closely with FMoT appointed grievance officers to ensuring that all grievances are registered and redressed timeously.</li> </ul>	<ul style="list-style-type: none"> <li>Proof of GRM awareness campaigns conducted.</li> <li>Number of grievances registered per month.</li> <li>GRC established in each PAC.</li> </ul>	Mota Engil	Within 3 Months of 1 <sup>st</sup> drawdown
PS5/OS5 07	<b>Vulnerable persons assessment</b> The assessment of vulnerable persons is generic and regarded as incomplete since it does not consider multi-dimensional vulnerabilities of PAPs and other persons who may be vulnerable due to the project's land acquisitions such as illegal land users,	High	Review and revise the vulnerability assessment to consider multi-dimensional vulnerability of PAPs and PACs. The assessment should also include persons likely to be made vulnerable by the project where these individuals are deemed not to be eligible for compensation.	An updated vulnerability assessment	Mota Engil	Within 3 Months of 1 <sup>st</sup> drawdown

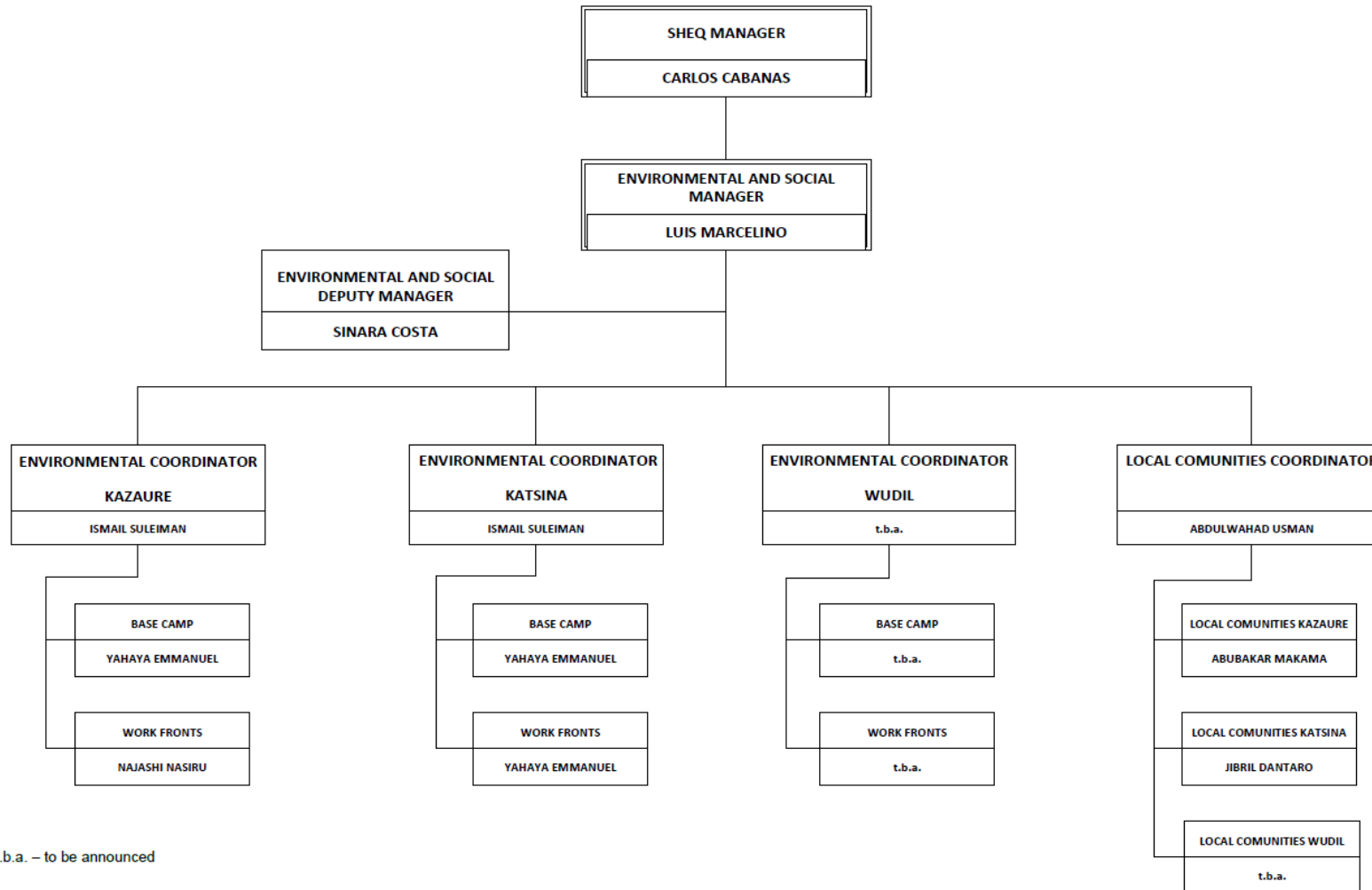
Index	Finding / Deficiency	Risk Ranking	Action Items / Recommendations	Completion Indicator	Responsibility	Completion Timeframe
	and squatters which the eligibility criteria deem as not eligible for compensation, and land users who had rights to land but at the time of the valuation the land was fallow. Such groups may end-up vulnerable due to the project.					
PS6/OS 6-01	<p><b>Ecosystems delineation</b></p> <p>There is no delineation or description of wetland habitats outside river channels leading to potentially inadequate drainage and subsequent loss of ecosystem functionality.</p> <p>No full species list, as observed, was provided, which is mostly lacking for plants. This is because indigenous species are to be used for rehabilitation and no-net-loss activities, and this cannot be verified nor measured if the original/natural species composition is not reported on.</p> <p>The above also leads to the under-estimation of the importance of retaining as many Baobab trees as possible due to their role as ecosystem keystone species.</p> <p>There is uncertainty on the where 'replacement land' will be obtained in fulfilment of resettlement and alternative cultivation field requirements, and how this will impact biodiversity.</p> <p>Insufficient monitoring protocols for biodiversity, including for erosion or rehabilitation post unplanned events and operation.</p> <p>Unclear transition and nature of monitoring from construction to operational phase.</p> <p>BMP to be cross-referenced in all other management plans that could potentially have an impact on biodiversity.</p>	Moderate	<ul style="list-style-type: none"> <li>• Ensure that the full extent of wetlands associated with some of the larger rivers, forest reserves and ponds is investigated and mapped by a duly qualified wetland specialist, where the rail crosses such (emphasis on the Nigerian sections), and then verify if additional drainage structures (culverts, pipes or subsurface drainage mattresses) need to be installed at regular intervals across such wetland(s) to avoid significant changes to natural water movement across the rail servitude. This may be in addition to planned bridges over a river channel. With current bridges and drainages planned, it is anticipated that the need for additional drainage will be limited, but it will still be important.</li> <li>• Extract the full species list from the original biodiversity baselines. If this is not available, a duly qualified ecologist should be engaged to compile at least a full species list for riparian and aquatic flora, and a list of indigenous grasses and potentially low/prostrate perennial forbs or dwarf shrubs that can be used for rehabilitation.</li> <li>• Ensure that the BMP renders higher importance to Baobab trees than just nesting sites, and that soil compaction, groundworks and other disturbances be avoided within a radius of at least 15m of the tree.</li> <li>• As part of completion of the RAP, determine the type and extent of natural/semi-natural habitats that could be impacted by land needs, and undertake at least a screening of biodiversity for any potential sensitivities.</li> <li>• Monitoring protocols that cover all aspects of biodiversity and related ecosystem stability and enable the tracking of progress / efficiency of mitigation measures from construction to operation and where applicable, decommissioning.</li> <li>• Ensure BMP is cross-referenced adequately across all relevant plans.</li> </ul>	<ul style="list-style-type: none"> <li>• All wetlands (ponds, floodplains, etc) mapped and sufficient drainage verified to be included in designs where necessary, understanding that most of these wetlands will be ephemeral / seasonal.</li> <li>• Representative species lists of the floristic composition for each type of natural habitat.</li> <li>• Maximum number of Baobab trees retained within the Project footprint.</li> <li>• Risks and/or impacts to biodiversity by RAP implementation understood and mitigated.</li> <li>• Updated BMP and where applicable, drainage designs with the required information.</li> <li>• Updated and more detailed monitoring protocols.</li> <li>• Adequate cross-referencing of the BMP across all relevant management plans.</li> </ul>	Mota Engil	<ul style="list-style-type: none"> <li>• As soon as practically possible to avoid delays in site preparation and construction as understood to be in its initial phases.</li> <li>• Before construction and final planning of all crossing associated with larger rivers and/or forest reserves.</li> <li>• Monitoring to be continued through construction and operation and decommissioning.</li> </ul>
PS6/OS 6-02	<p><b>Rehabilitation Plans and restoration of ecosystems</b></p> <p>Poor re-instatement of riparian areas and poor performance of no-net-loss measures</p>	Low	<ul style="list-style-type: none"> <li>• Extract the full species list from the original biodiversity baselines. If this is not available, a duly qualified ecologist should be engaged to compile at least a full species list for riparian and aquatic flora, and a list of</li> </ul>	<ul style="list-style-type: none"> <li>▪ Refined rehabilitation plan and associated cultivation and/or seeding of species.</li> </ul>	Mota Engil	As soon as practically possible, before significant continuation of



Index	Finding / Deficiency	Risk Ranking	Action Items / Recommendations	Completion Indicator	Responsibility	Completion Timeframe
	will lead to gradual loss of ecosystem services. With the current lack on natural species composition of natural habitats, progress towards rehabilitation and no-net-loss by enhancement of degraded areas cannot be measured. Inconsistency relating to dealing with cleared vegetation between BMP and Project description.		indigenous grasses and potentially low/prostrate perennial forbs or dwarf shrubs that can be used for rehabilitation. <ul style="list-style-type: none"> <li>Use these species lists to refine the rehabilitation plan to avoid further damage to ecosystem services.</li> <li>Align sections of the ESIA dealing with cleared vegetation to the BMP.</li> </ul>	<ul style="list-style-type: none"> <li>Optimally efficient and long-term sustainable rehabilitation implemented.</li> <li>Unambiguous guidelines on dealing with cleared vegetation.</li> </ul>		construction to facilitate progressive rehabilitation.
PS6/OS 6-03;	<p><b>Biodiversity Management Plan, habitat sensitivity delineation and species list</b></p> <p>Not enough information on habitat preferences nor appropriate monitoring actions for the only potential critical habitat triggering species, being the African Spurred Tortoise (<i>Centrochelys sulcata</i>), and hence no-net-loss or net gain measures cannot be efficiently specified nor measured.</p> <p>No clear habitat maps, no clear habitat sensitivity maps provided (other than mapping forest reserves), impeding the efficiency of biodiversity protection and monitoring measures.</p> <p>Without more detailed information on actual species composition and species to be used for rehabilitation and no-net-loss activities, the efficiency of conservation actions over time cannot be verified, especially in forest reserves.</p> <p>As indicated under PS6-01, some forest reserves are likely seasonal wetlands, but this has not been adequately investigated and may lead to insufficient drainage being installed. This may potentially lead to further loss of protected areas ecosystem stability or where already modified to croplands, ecosystem productivity.</p>	High	<ul style="list-style-type: none"> <li>Ensure BMP provides for recording of the African Spurred Tortoise in addition to other fauna specified, also recoding locality and as much information as possible on prevailing habitat to slowly gather sufficient information to contribute to its conservation efforts. It is understood that such conservation efforts may form part of the Project's no-net-loss activities, but will not be the (sole) responsibility of the Project nor its operators.</li> <li>Present clear habitat and habitat sensitivity maps with the Project footprint as overlay to facilitate the implementation of the BMP by all project-related staff.</li> <li>Using these maps and the species lists as specified in PS6-02, refine the planning and monitoring of rehabilitation and conservation activities in a way that is practical, measurable and sustainable in the long term.</li> <li>As per PS6-01, appoint a duly qualified wetland specialist to determine the full extent of wetland characteristics.</li> </ul>	<ul style="list-style-type: none"> <li>Updated BMP</li> <li>Clear habitat and habitat sensitivity maps included in the BMP. These to also include the wetland maps.</li> <li>More detailed rehabilitation plan and no-net-loss activities, including list of desirable species and desirable cover of each to be achieved.</li> <li>More detailed monitoring plan enabling the tracking of rehabilitation progress and achievement of no-net loss goals (or adaptive management actions if required).</li> </ul>	Mota Engil	<ul style="list-style-type: none"> <li>As soon as practically possible, before significant continuation of construction to facilitate progressive rehabilitation and implementation of no-net loss programs.</li> <li>Monitoring to be continued through construction and operation and decommissioning where applicable.</li> </ul>
PS6/OS 6-04	<p><b>Alien vegetation control</b></p> <p>The use of fire for controlling some alien invasive species has been mentioned as possible control tool – however, as this could pose a risk of uncontrolled fires.</p>	Low	<ul style="list-style-type: none"> <li>If fire is to be used as control measure for some alien invasive species, the practicability of this needs to be evaluated and then clearly linked to a fire-response protocol in the emergency preparedness procedure. Alternatively specify that fire shall not be used as a control agent, potentially soil solarization may be a</li> </ul>	<ul style="list-style-type: none"> <li>Clear guideline on the use or prohibition of fire for control of alien invasive plants species, or viable alternatives.</li> </ul>	Mota Engil	As soon as practically possible

Index	Finding / Deficiency	Risk Ranking	Action Items / Recommendations	Completion Indicator	Responsibility	Completion Timeframe
	The alien invasive species control plan allows for the use of herbicide if needed.		<p>more feasible alternative to reduce soil seed banks and re-emergence.</p> <ul style="list-style-type: none"> <li>As noted under PS3, if herbicides will be used, this will require a pesticide control plan. Ideally, permissible active ingredients need to be listed, taking local legislation and international best practice into consideration.</li> </ul>	<ul style="list-style-type: none"> <li>Clear guidelines on the safe selection and management of herbicides.</li> </ul>		

# APPENDIX A MOTA ENGIL ORGANOGRAM



t.b.a. – to be announced



## APPENDIX B PROTECTED AREA REGISTER

Forest Reserve	Location/ Coordinate	Area (Km <sup>2</sup> )	IUCN Managem ent Category	Protected Area Type	Status	Statu s year	WDPA ID	Gazette ment Document Details	Source	Agency in- charge
Shakwadina	Kano State  N11.833656 °  E09.075020 °	53.17	Not Reported	Terrestrial and inland waters protected area	Designated (National)	Not Repor ted	36601	Not available	UNEP-WCMC (2024). Protected Area Profile for Shakwadina from the World Database on Protected Areas, March 2024. Available at: <a href="http://www.protectedplanet.net/36601">www.protectedplanet.net/36601</a>	FME nv  (Federal Department of Forestry)
Gwiwa korel	Jigawa State  N12.804768 °  E8.389811°	37.33	Not Reported	Terrestrial and inland waters protected area	Designated (National)	Not Repor ted	36309	Not available	UNEP-WCMC and IUCN (2024), Protected Planet: The World Database on Protected Areas (WDPA) and World Database on Other Effective Area-based Conservation Measures (WD- OECM) [Online],	FME nv  (Federal Department of Forestry)

Forest Reserve	Location/ Coordinate	Area (Km <sup>2</sup> )	IUCN Managem ent Category	Protected Area Type	Status	Statu s year	WDPA ID	Gazette ment Document Details	Source	Agency in- charge
									March 2024, Cambridge, UK: UNEP-WCMC and IUCN. Available at: <a href="http://www.protectedplanet.net">www.protectedplanet.net</a> .	
Daura	Katsina state  N12.999268° E8.300766°	11.37	Not Reported	Terrestrial and inland waters protected area	Designated (National)	Not Reported	36200	Not available	UNEP-WCMC and IUCN (2024), Protected Planet: The World Database on Protected Areas (WDPA) and World Database on Other Effective Area-based Conservation Measures (WD-OECM) [Online], March 2024, Cambridge, UK: UNEP-WCMC and IUCN. Available at: <a href="http://www.protectedplanet.net">www.protectedplanet.net</a> .	FMinv (Federal Department of Forestry)

Forest Reserve	Location/ Coordinate	Area (Km <sup>2</sup> )	IUCN Managem ent Category	Protected Area Type	Status	Statu s year	WDPA ID	Gazette ment Document Details	Source	Agency in- charge
Damangu	Katsina  N12.999268 °  E7.915766°	32.62	Not Reported	Terrestrial and inland waters protected area	Designated (National)	Not Repor ted	36291	Not available	UNEP-WCMC and IUCN (2024), Protected Planet: The World Database on Protected Areas (WDPA) and World Database on Other Effective Area-based Conservation Measures (WD- OECM) [Online], March 2024, Cambridge, UK: UNEP-WCMC and IUCN. Available at: <a href="http://www.protectedplanet.net">www.protectedplanet.net</a> .	FME n  (Federal Department of Forestry)
Nasarawa	Katsina  N13.044056 °  E7.525947°	46.57	Not Reported	Terrestrial and inland waters protected area	Designated (National)	Not Repor ted	36393	Not available	UNEP-WCMC and IUCN (2024), Protected Planet: The World Database on Protected Areas (WDPA) and World Database on Other Effective Area-based Conservation	FME n  (Federal Department of Forestry)

Forest Reserve	Location/ Coordinate	Area (Km <sup>2</sup> )	IUCN Managem ent Category	Protected Area Type	Status	Statu s year	WDPA ID	Gazette ment Document Details	Source	Agency in- charge
									Measures (WD-OECM) [Online], March 2024, Cambridge, UK: UNEP-WCMC and IUCN. Available at: <a href="http://www.protectedplanet.net">www.protectedplanet.net</a> .	
Dutsin Kuba	Katsina  N13.091452 ° E07.409150 °	14.79	Not Reported	Terrestrial and inland waters protected area	Designated (National)	Not Reported	36189	Not available	UNEP-WCMC (2024). Protected Area Profile for Dutsin Kuba from the World Database on Protected Areas, March 2024. Available at: <a href="https://www.protectedplanet.net/36189">https://www.protectedplanet.net/36189</a>	FME Env  (Federal Department of Forestry)

**FME** -Federal Ministry of Environment | **IUCN** - The International Union of Conservation of Nature | **WDPA ID** - The World Database on Protected Area Identifier

## APPENDIX C VDR DOCUMENT LIST

Index	Document
1	ME SHEQ Internal Audit Report NIGERIA _2023 (1)
2	Mota-Engil Africa 14001 (IPAC)
3	Project Environmental Plan
4	Policy SHEQ_21112023_EN
5	SHEQ inductions_2024
6	2.3 International ESIA
7	2.4 National ESIA
8	2.1 ESMP
9	EIA certificate - KaMa
10	EIA certificate - Kunchi
11	FMEEnv EIA approval – Kunchi
12	Registration EIA permit – Katsina
13	T.0063_S.26_C.5_Vol.1_259 -EIA Approval for the Proposed Construction of KAMA
14	0546.ME.LCD.SG.BNEE.DNEIES Translated Letter of Response
15	RfP: KanoMaradi ESIA Final - 02102020
16	Registration EIA permit – Katsina
17	E&S organogram (SHEQ)_REV1
18	Project quality plan
19	0_Emergency and preparedness plan rev.01_pre
20	1_Emergency contacts rev.01_pre
21	2_Emergency plan – fluxogram rev.01_pre



22	2.1 Response preparedness rev.01_pre
23	3.1 Assembly emergency point location_Kazaure
24	4_Mock-drill-report-16-11-2023
25	ME Health and safety KPIs- 2023
26	ME Health and safety KPIs- 2024
27	ME SHEQ Internal Audit Report NIGERIA _2023 (1)
28	Sustainability audit diagnosis checklist
29	Stakeholder Engagement Plan
30	Social and Community Sustainability Plan
31	Grievance Management Procedure
32	Grievance Log (sighted during site visit)
33	Contractor Safety, Health, Environment and Quality Policy
34	-Social and Community Sustainability Plan: Kano-Maradi Single Track Standard Gauge railway Line 10001 NIG. KAMA- MENG -SU PLN0005
35	-ESIA Preliminary Early works on ESMP (Dawanau to Kazaure Section)
36	-Contractor HR Global Policy-Think Global
37	Act Local
38	-Employee Handbook: Contractor (Nigeria)
39	-SERVICE ORDER: Human Resources Global Policy
40	-Anti-Harassment and Discrimination Policy
41	-Contractor Harassment and Discrimination Policy N. ° 03/2022 DATE: 08/06/2022
42	-Sample of Employees' Contract letter
43	-Contractor's Grievance Management Procedure- Kano-Maradi Single Track Standard Gauge railway Line 10001 NIG. KAMA- MENG -SU PRO 000859 REV 00 23/02/23
44	-Grievance Register HR Kano Project (Template)

45	Employee Handbook: Contractor (Nigeria)
46	-Employment Contract Template (Expatriates)
47	-Contractor Nigeria Employment Contract (Locals)
48	-Kano-Maradi ESIA Preliminary Early works on ESMP (Dawanau to Kazaure Section).
49	-Kano To Maradi Rail, Nigeria and Republic of Niger: Human Rights Impact Assessment
50	-Contractor Human Resources Policy
51	-Contractor Employee Handbook
52	Contractor Anti-Harassment and Discrimination Policy
53	Mota- Engil Harassment and Discrimination Policy
54	ESIA Impact Assessment Chapter
55	-Contractor Gender Equality Plan 2024
56	-Contractor Human Resources Policy
57	-ESIA Preliminary Early works on ESMP (Dawanau to Kazaure Section)
58	-Contractor management procedure
59	-Contractors' daily report
60	Water management plan
61	20230119_Katsina water permit
62	20230113_Re Kano State water permit approved
63	Jigawa letter of water permit
64	Kano State water permit approved
65	Kazaure borehole permit site camp
66	Katsina State Ministry of Water letter
67	Fuel_Diesel supplies June_Nove 2023
68	Waste management plan

69	Wastewater Management Plan
70	Hazardous Material Management Plan
71	Soil Management Plan
72	Construction Biodiversity Management Plan
73	MENG-EM-PLN-00001541-REV0   02/10/2023
74	-Emergency and Preparedness Plan
75	-Emergency Contacts
76	-Response Procedure
77	-Mock Drill Report
78	-Security Operations Management Plan
79	SOP Security Plan
80	Security Threat Report
81	Letter of contract with the Police
82	Letter of contract with NSCDC
83	-Security Code of Conduct Guideline
84	Contractor's Africa Security Services for the Kano-Maradi Railway Project -TECHNICAL PROPOSAL
85	Kano To Maradi Rail, Nigeria, and Republic of Niger-ESIA: Chapter 1 - 4
86	Kano-Maradi Final RAP Section 1 and Supplementary RAP
87	Stakeholders Engagement Register
88	Stakeholder Engagement Plan -Kano-Maradi Single Track Standard Gauge Railway Line 10001-NIG.KAMA- MENG-SU-PLN-000857 – Rev00   Date:23/02/2023
89	Kano-Maradi Final RAP Section 1 and Supplementary RAP
90	Grievance Register 2023
91	Grievance Register 2024

92	Kano-Maradi Final RAP Section 1 and Supplementary RAP
93	III.B.4 route screening update
94	2023_Kano_Maradi_ESIA Report (Final): 03 Project Description
95	Final ESIA Technical Annex F: Water Resources
96	Final ESIA Technical Annex G: Biodiversity
97	Biodiversity management plan
98	SKonica Min24032111370
99	SKonica Min24032111380
100	SKonica Min24032111401
101	2023_Kano_Maradi_ESIA Report (Final)
102	2023_Kano_Maradi_ESIA Report (Final): 03 Project Description
103	MEA Nigeria KM railway land and biodiversity route screening updated 24052021
104	2023_Kano_Maradi_ESIA Report (Final): 07 Baseline Summary
105	20240313 NIG_KAMA_FM_2024_1498 - Forest Reserves Affected by the Project
106	NIG.KAMA.AG.2022.262 - FMoE Forest reserve annex
107	NIG.KAMA.AG.2022.252 FmoT FMoE Forest reserve grave sites
108	V.A. 1.1 1620011906-RAM-RP-IA-00039_Chp08_Impact Assessment1
109	ESIA Preliminary Early works on ESMP (Dawanau to Kazaure Section);
110	Chance Find Procedure
111	Cultural Heritage Management Plan

## APPENDIX D SITE PHOTOGRAPHS



Photograph 1: Discussion with Human Resource Representatives



Photograph 2: Discussion with Camp Clinic Representatives



Photograph 3: Discussion with Environmental and Social Manager



Photograph 4: Discussion with Health and Safety Manager





Photograph 5: Discussion with Security Managers



Photograph 6: Discussion with Site Camp Manager



Photograph 7: Discussion with one of the aggrieved PAPs at the Emir of Katsina Palace, Katsina State

Photograph 8: Discussion with the Subcontractor Representatives



Photograph 9: Focus Group Discussion with Female Workers



Photograph 10: Focus Group Discussion with Male Workers





Photograph 11: FGD with Communities in Kunchi Quarry, Kano State



EnvAccord | Rade B.Safana | 2024.03.14 12:57

Photograph 12: FGD with Unguwar Dinya Community, Jigawa State



EnvAccord | kazaure, Jigawa | 2024.03.14 14:55

Photograph 13: FGD with Communities in Sandamu LGA, Katsina State

Photograph 14: Discussion with Elders at kazaure palace, Jigawa State



Photograph 15: Discussions with Ministry of Environment and Ministry of Lands and Survey, Katsina State



Photograph 16: Courtesy Visit to the Emir of Kano, Kano State



Photograph 17: Courtesy visit to the Emir of Daura, Katsina State



Photograph 18: RoW ground-truthing in Niger Republic



Photograph 19: RoW ground-truthing in Niger Republic



Photograph 20: RoW ground-truthing in Niger Republic





Photograph 21: RoW ground-truthing in Niger Republic



Photograph 22: Mobile toilet facilities at Kazaure Camp Site



EnvAccord | Maradawa, Kazaure | 2024.03.14 11:28



EnvAccord | Maradawa, Kazaure | 2024.03.12 14:53

Photograph 23: Fire extinguisher at one of the offices in Kazaure



Photograph 24: Safety precautions displayed at Kazaure campsite



Photograph 25: Sample single-occupant room at Kazaure camp

Photograph 26: Rows of single-occupant rooms at the Kazaure camp



EnvAccord | 2024.05.15 16:38

Photograph 27: Offsite accommodation facility at Kazaure



EnvAccord | 2024.03.13 16:39

Photograph 28: Recreational areas at Kazaure camp



EnvAccord | 2024.03.13 16:39



EnvAccord | 2024.03.12 16:57



Photograph 29: Group photograph, Ministry of Environment, Katsina



Photograph 30: Group photograph at Ungwar Dinya Community



Photograph 31: Group photograph, Sandamu LGA, Katsina State

Photograph 32: Group photograph Kunchi Quarry communities, Kano



Photograph 33: Staff Canteen at Kazaure Camp Site, Jigawa State

Photograph 34: Ongoing sleeper factory construction at Kazaure





Photograph 35: Community members fetching water at Kunchi quarry (slip and fall risk which could result in drowning)



Photograph 37: Batching plant at Kazaure camp

Photograph 36: Section of construction machinery at Kazaure



Photograph 38: SHEQ organogram at camp office




Photograph 39: Section of Kunchi Quarry, Kano State



Photograph 40: Section of Kunchi Quarry, Kano State


# APPENDIX E ATTENDANCE LOG

ENVIRONMENTAL ACCORD NIGERIA LIMITED 368, Oguntona Crescent, Gbagada (Phase 1), Lagos 0813-636-3762; 0802-360-9591 info@envaccord.com http://www.envaccord.com		<b>ATTENDANCE</b>	
<b>Project Title</b>	ENVIRONMENT AND SOCIAL DUE DILIGENCE FOR THE KANO-MARADI RAILWAY PROJECT		
<b>Purpose/Activity</b>	IDI WITH HUMAN RESOURCE MANAGER		
<b>Date</b>	11/03/2024		
<b>Venue</b>	CAMP SITE		

S/N	Name	Community	Designation	Phone Number	Signature
1	Ali CIm	Aba-Egidi	HR	09122803550	[Signature]
2	Doukhan Mawana	Mita-Egidi	CLO	07010400021	[Signature]
3	Musa-Jamilu FUREWA	Mita-Egidi	ENVIRONMENTAL	09104400077	[Signature]
4	Ummid-Khair Bala	///	HR	09104000061	[Signature]
5	Muhammad Basha Amin	///	HR	0912381248	[Signature]

Discussion with Human Resource Representatives

ENVIRONMENTAL ACCORD NIGERIA LIMITED 368, Oguntona Crescent, Gbagada (Phase 1), Lagos 0813-636-3762; 0802-360-9591 info@envaccord.com http://www.envaccord.com		<b>ATTENDANCE</b>	
<b>Project Title</b>	ENVIRONMENT AND SOCIAL DUE DILIGENCE FOR THE KANO-MARADI RAILWAY PROJECT		
<b>Purpose/Activity</b>	HEALTH CLINIC		
<b>Date</b>	11/03/2024		
<b>Venue</b>	CAMP SITE		

S/N	Name	Community	Designation	Phone Number	Signature
1	Abba Adamu Amin	Mitayari	SHEQ	09104000020	[Signature]
2	Abubakar A. Basha	///	SHEQ	09104000046	[Signature]
3	Abdullahi Umar	///	SHEQ	9040451900	[Signature]
4	Abdullahi Umar	///	SHEQ	0913815810	[Signature]


Discussion with Camp Clinic Representatives

ENVIRONMENTAL ACCORD NIGERIA LIMITED 368, Oguntona Crescent, Gbagada (Phase 1), Lagos 0813-636-3762; 0802-360-9591 info@envaccord.com http://www.envaccord.com		<b>ATTENDANCE</b>	
<b>Project Title</b>	ENVIRONMENT AND SOCIAL DUE DILIGENCE FOR THE KANO-MARADI RAILWAY PROJECT		
<b>Purpose/Activity</b>	IDI WITH HEALTH AND SAFETY TEAM		
<b>Date</b>	14/03/2024		
<b>Venue</b>	CAMP SITE		

S/N	Name	Community	Designation	Phone Number	Signature
1	LUIS NAREBAVO	HE VIGERIA	EHS MANAGER	0848873324	[Signature]
2	Luis ANTONES	ITENIGUA	HFS MANAGER	09113815381	[Signature]
3	Benoit DRE	MIGON	HFS Coordinator	09104000090	[Signature]
4	Flaminia Tchejjo	AFDS	ES Officer	0915484208	[Signature]
5	Bassey Ibiam	AFDS	EHS Officer	0913715587	[Signature]

Discussion with E&S and HSE Managers

ENVIRONMENTAL ACCORD NIGERIA LIMITED 368, Oguntona Crescent, Gbagada (Phase 1), Lagos 0813-636-3762; 0802-360-9591 info@envaccord.com http://www.envaccord.com		<b>ATTENDANCE</b>	
<b>Project Title</b>	ENVIRONMENT AND SOCIAL DUE DILIGENCE FOR THE KANO-MARADI RAILWAY PROJECT		
<b>Purpose/Activity</b>	DISCUSSIONS WITH THE SECURITY MANAGERS		
<b>Date</b>	11/03/2024		
<b>Venue</b>	KAZAOURE CAMP SITE		

S/N	Name	Community	Designation	Phone Number	Signature
1	Vitor Gola	Aba-Egidi	Security Manager	0809990831	[Signature]
2	Yusuf Gola	Mita-Egidi	Security Manager	08080459590	[Signature]
3	Jean-Paul PEQUIN	GardaWorld	Security Manager	0943938356	[Signature]

Discussion with Security Managers







NIGERIA SEP ATTENDANCE LIST  
KAMA PROJECT | SUSTAINABILITY (SHEQ)  
MEMO-SU-FTP-103-REV0

**General Information**

Date: 14th March 2024 ID Number: NIG.KAMA/SE/103  
 Location of Meeting (community, district): Unguwar Dinya, Pami L.G.A, Jigawa State  
 Purpose of Engagement: EFS Due Diligence  
 Number of Attendees: 17 (Seventeen)  
 Name of Person Recording Attendance: Abdulwahab Mustamin Usman

**Attending Stakeholders**

#	First Name	Surname	Sex (M/F)	Place of Residence (community, district)	Position	Contact Details (telephone, email)	Signature
1	Abubakar	Yanzaki	M	Yanzaki, Wai'are	v. Head	08065992013	[Signature]
2	Muhammed	Ibrahim	M	Yanzaki, U/Dunya	v. Head	07088138630	[Signature]
3	Salisu	Ibrahim	M	U/Dunya	Member	08126990667	[Signature]

NIGERIA SEP ATTENDANCE LIST  
KAMA PROJECT | SUSTAINABILITY (SHEQ)  
MEMO-SU-FTP-103-REV0

**General Information**

Date: 14/03/2024 ID Number: NIG.KAMA/SE/103  
 Location of Meeting (community, district): Jigawa Communities, Sandamu L.G.A, Katsina State  
 Purpose of Engagement: AFD B & ENVIRONMENT DUE DILIGENCE COM VISIT  
 Number of Attendees: TWENTY-NINE (29)  
 Name of Person Recording Attendance: ABUBAKAR S. MARKAMA

**Attending Stakeholders**

S/N	First Name	Surname	Sex (M/F)	Place of Residence (community, district)	Position	Contact Details (telephone, email)	Signature
4	Habbibu	Umar	M	Yanzaki, U/Dunya	Member	0708962502	[Signature]
5	Sunusi	AbdulKadir	M	U/Dunya	Member	070469026271	[Signature]
6	Lado	Muhammed	M	U/Dunya	Member	09020770058	[Signature]
7	Bala	Garba	M	U/Dunya	Member	08120315289	[Signature]
8	Shacibu	Abdulkali	M	U/Dunya	Member	08158492607	[Signature]
9	Haruna	Ibrahim	M	U/Dunya	Member	08126226255	[Signature]
10	Adamu	Ahmed	M	U/Dunya	Member	09047293292	[Signature]

FGD with Unguwar Dinya Community, Jigawa State

FGD with Unguwar Dinya Community, Jigawa State

NIGERIA SEP ATTENDANCE LIST  
KAMA PROJECT | SUSTAINABILITY (SHEQ)  
MEMO-SU-FTP-103-REV0

**General Information**

Date: 14/03/2024 ID Number: NIG.KAMA/SE/103  
 Location of Meeting (community, district): Jigawa Communities, Sandamu L.G.A, Katsina State  
 Purpose of Engagement: AFD B & ENVIRONMENT DUE DILIGENCE COM VISIT  
 Number of Attendees: TWENTY-NINE (29)  
 Name of Person Recording Attendance: ABUBAKAR S. MARKAMA

**Attending Stakeholders**

S/N	First Name	Surname	Sex (M/F)	Place of Residence (community, district)	Position	Contact Details (telephone, email)	Signature
11	Ladi	MARCELIUS	M	KANO	EPS MANAGER	08126990667	[Signature]
12	RAFAEL	LADISI	M	LADISI	SOCIAL SECRETARY	08126990667	[Signature]
13	Abubakar	Abdullahi	M	KANO	HEAD OF PIAU KANO OFFICE	08037891242	[Signature]
14	ABUBAKAR S.	MARKAMA	M	Meta-Evical Katsina	CLO	0706400021	[Signature]
15	Florentina	Tchigbo	F	AFDB	EPS Office	09154842055	[Signature]
16	Abdulwahab	Mustamin Usman	M	Kano	EPS CLC	09120491125	[Signature]
17	Bobby	Hadima	M	AFDB	EPS Office	0823735876	[Signature]

NIGERIA SEP ATTENDANCE LIST  
KAMA PROJECT | SUSTAINABILITY (SHEQ)  
MEMO-SU-FTP-103-REV0

**General Information**

Date: 14/03/2024 ID Number: NIG.KAMA/SE/103  
 Location of Meeting (community, district): Jigawa Communities, Sandamu L.G.A, Katsina State  
 Purpose of Engagement: AFD B & ENVIRONMENT DUE DILIGENCE COM VISIT  
 Number of Attendees: TWENTY-NINE (29)  
 Name of Person Recording Attendance: ABUBAKAR S. MARKAMA

**Attending Stakeholders**

S/N	First Name	Surname	Sex (M/F)	Place of Residence (community, district)	Position	Contact Details (telephone, email)	Signature
1	Abubakar	Abdullahi	M	Kano	CLC	08037891242	[Signature]
2	RAFAEL	LADISI	M	LADISI	SOCIAL SECRETARY	09120491125	[Signature]
3	Muhammed	Nasun	M	Jigawa	PAP	0808187961	[Signature]
4	RAFAEL	ISH	M	Jigawa	PAP	09064186767	[Signature]
5	ISA	SANI	M	Jigawa	PAP	09047050857	[Signature]

FGD with Unguwar Dinya Community, Jigawa State

FGD with Communities in Sandamu LGA, Katsina State



NIGERIA  
SEP ATTENDANCE LIST  
KAMA PROJECT | SUSTAINABILITY (SHEQ)  
MEMO-SUP-PP-1037-REV 0

S/N	First Name	Surname	Sex (M/F)	Place of Residence (community, district)	Position	Contact Details (telephone, email)	Signature
6	Atimani	Usman	M	S/C Jiba	PAP	07077054313	
7	Dani Juma	Yakubu	M	Jiba	PAP	07077054313	
8	Jasi'y	Ya'u	M	Jiba	PAP	-	
9	LABARAN	YUSUF	M	Jiba	✓	-	
10	LIRIBATA	ADAMU	M	Jiba	✓	-	
11	SABIRU	USMAN	M	Jiba	PAP	-	
12	ANWAR	ISAH	M	✓	✓	09114286323	
13	HAZFI	ASHAFU	M	✓	✓	09024613220	
14	BUNARI	IDRIS	M	S/A Jiba	✓	-	
15	ABDULLAH	MUSA	M	S/A Jiba	✓	0800133049	
16	USMAN IDRIS	IDRIS	M	Jiba	✓	-	

FGD with Communities in Sandamu LGA, Katsina State

NIGERIA  
SEP ATTENDANCE LIST  
KAMA PROJECT | SUSTAINABILITY (SHEQ)  
MEMO-SUP-PP-1037-REV 0

S/N	First Name	Surname	Sex (M/F)	Place of Residence (community, district)	Position	Contact Details (telephone, email)	Signature
17	ALI	Ikman	M	Jiba	PAP	-	
18	NASIRU	ATTAMA	M	S/A Jiba	PAP	08137654599	
19	YUSUF	AHMAD	M	S/A Jiba	PAP	08101636321	
20	ALI ALI	IDRIS	M	FURTA	PAP	0809993093	
21	ABUBAKAR	MUKAMA	M	MENGA	C.O	0701090021	
22	Bassey	Udoinma	M	AFAB	ES officer	08037125876	
23	Engr Sadiq Abdullah		M	FMO	Engr. Mktg	0836192985	
24	AMINU MAJIBU	BUTHARI	M	JIBA	VILLAGE	08039109327	
25	HABIB ZUBAIRU		M	R/ISAMU	NITONGA	08039245814	
26	Eleudine Dajog		F	AFAB	CS officer	0915881055	
27	Mis	Adolph	M	EMARAD	Stakeholder	08023597648	

FGD with Communities in Sandamu LGA, Katsina State

NIGERIA  
SEP ATTENDANCE LIST  
KAMA PROJECT | SUSTAINABILITY (SHEQ)  
MEMO-SUP-PP-1037-REV 0

S/N	First Name	Surname	Sex (M/F)	Place of Residence (community, district)	Position	Contact Details (telephone, email)	Signature
28	Jibril Sulaiman	BANIWA	M	MENGA	CLD	07024945059	
29	ABDULLAH	MUSA USMAN	M	KALIO	EXS CLD	09120491175	
30							
31							
32							
33							
34							
35							
36							
37							

FGD with Communities in Sandamu LGA, Katsina State

NIGERIA  
SEP ATTENDANCE LIST  
KAMA PROJECT | SUSTAINABILITY (SHEQ)  
MEMO-SUP-PP-1037-REV 0

Information

Date: 16 Nov 2024 ID Number: NIG/KAMA/SE/099

Location of Meeting (Community, district): KAZAURE EMIR PALACE, JIGAWA STATE

Purpose of Engagement: CES DUE DILIGENCE

Number of Attendees: 17 (thirteen)

Name of Person Recording Attendance: ABDULLAH MUSA USMAN

Attending Stakeholders

#	First Name	Surname	Sex (M/F)	Place of Residence (community, district)	Position	Contact Details (telephone, email)	Signature
1	RUS	ABDULH	M	Lagos	Special Specialist	08136100000	
2	AHAR SMIKU	ABUBAKAR	M	EMIR COUNCIL	Chairman	EMIR COUNCIL	
3	JAMALU UMAR		M	EMIRATE COUNCIL	MICHAEL KAZAURE COUNCIL	EMIRATE COUNCIL	

Discussions with Elders in Kazaure Emir Palace, Jigawa State





NIGERIA  
SEP ATTENDANCE LIST  
KAMA PROJECT | SUSTAINABILITY (SHEQ)  
MENG-SU-PTP-1637-REV0

4	Uma	TAFDA	ADAMU	M	KAZAURE EMIRATE (KAZ)	DISABILITY HEADQUARTERS	KAZAURE EMIRATE		
5	MANNIR		IBRAHIM	M	BOSTWICK HOUSE ATKINS	BOSTWICK HOUSE ATKINS	KAZAURE EMIRATE COUNCIL		
6	Nura Yunus	Abdullah	Abdullah	M	Emirate Council	KAZAURE	Emirate Council		
7	Yusuf		Mohammed	M	Emirate Council	KAZAURE	Emirate Council		
8	Adnan		Ilmoraj	M	Council Secretary	KAZAURE	Emirate Council		
9	Sani		Umar	M	Secretary	KAZAURE	Emirate Council		

Discussions with Elders in Kazaure Emir Palace, Jigawa State

NIGERIA  
SEP ATTENDANCE LIST  
KAMA PROJECT | SUSTAINABILITY (SHEQ)  
MENG-SU-PTP-1637-REV0

11	Eng. Nasim A		Chibay	M	FMOT	Page Telco	nasimaj@gmail.com		
12	RAPHEL		L. ADI	M	L. ADI	SOLAR SCIENTIST	raphel@emerald.com		
13	Lois		MARCELO	M	KANO	EBS Manager	lois.marcelo@state-will.org		
14	ABDULLATIF		MUHAMMAD	M	KANO	EBS CLC	abdullatif@emerald.com		
15	Abubakar		MUSA	M	KANO	Home	abubakar@emerald.com		
16	Abubakar S.		MARANA	M	KANO	CLD	0910400021		
17	Florence		Tchijio	F	AFAB	EIS Officer	0945 484 2051		

Discussions with Elders in Kazaure Emir Palace, Jigawa State

NIGERIA  
SEP ATTENDANCE LIST  
KAMA PROJECT | SUSTAINABILITY (SHEQ)  
MENG-SU-PTP-1637-REV0

18	Engr		Abdullah	M	AFAB	EIS Officer	092735816		
19	Ismail		Jamil Suleiman	M	MOE-Engr	CLD	0910400027		
20									
21									
22									
23									
24									

Discussions with Elders in Kazaure Emir Palace, Jigawa State

ENVIRONMENTAL ACCORD NIGERIA LIMITED  
36B, Oguntona Crescent, Gbagada (Phase 1),  
Lagos 0813-636-3762; 0802-360-9591  
info@envaccord.com  
http://www.envaccord.com

**ATTENDANCE**

**EnvAccord**

**Project Title** ENVIRONMENT AND SOCIAL DUE DILIGENCE FOR THE KANO-MARADI RAILWAY PROJECT  
**Purpose/Activity** JOINT MEETING WITH THE MINISTRY OF ENVIRONMENT AND MINISTRY OF LANDS AND SURVEY  
**Date** 13/03/2024  
**Venue** MINISTRY OF ENVIRONMENT, KATSINA

S/N	Name	Community	Designation	Phone Number	Signature
1	Eng. Saleh Abubakar	FMOT	Env. Risk Log.	07036172985	
2	Lois MARCELO	MEV6	EIS MANAGER	8088843324	
3	Abubakar Musa Usman	MEV6	CLC ESS	0910491125	
4	Abubakar Marana	MOE-Engr	CLD	0910400021	
5	Jamil Suleiman Danjuma	MOE-Engr	CLD	0910400027	
6	Umar Adamu	MOE-Engr	Deed officer	01068403663	
7	Sada Abashe	MOE-Engr	DPRS	0812913754	
8	Eng. Jamani Hussain	MOE-Engr	Ag. DEC	0803738498	
9	Abubakar Hussain	MOE-Engr	Director Admin	0804541285	
10	Abubakar A. Marana	MOE-Engr	Home	0803738498	

Discussions with Ministry of Environment and Ministry of Lands and Survey, Katsina State



<b>Project Title</b>	ENVIRONMENT AND SOCIAL DUE DILIGENCE FOR THE KANO-MARADI RAILWAY PROJECT
<b>Purpose/Activity</b>	JOINT MEETING WITH THE MINISTRY OF ENVIRONMENT AND MINISTRY OF LANDS AND SURVEY
<b>Date</b>	13/03/2024
<b>Venue</b>	MINISTRY OF ENVIRONMENT, KATSINA

S/N	Name	Community	Designation	Phone Number	Signature
1.	Mr. Mustapha Adam	Egga	ACE	0908549634	[Signature]
2.	Dr. Faizal Umar Kato	Katsina	H.C. Lands	08016047825	[Signature]
3.	Muhammad Kato	Katsina	PS	08057616574	[Signature]
4.	Florence Tchoffo	AFB	ES Officer	09154842055	[Signature]
5.	Abayọọ Ojo	AFB	ES Officer	08127135876	[Signature]
6.	Pius Hage	ENVIRONMENT	Special Scientist	09131037024	[Signature]
7.	Raphael Lasari	ENVIRONMENT	Special Scientist	09122026073	[Signature]

NIGERIA

**SEP ATTENDANCE LIST**  
KAMA PROJECT | SUSTAINABILITY (SHEQ)  
MENG-SU-FTP-1637-REV0

<b>General Information</b>						
Date	13 <sup>th</sup> March, 2024	ID Number	K19.Kama/se/101			
Location of Meeting (community, district)	MINISTRY OF ENVIRONMENT, KATSINA, KATSINA STATE					
Purpose of Engagement	E-S DUE DILIGENCE					
Number of Attendees	20 (Twenty)					
Name of Person Recording Attendance	AD. BULWANE MUHAMMAD UMAR					
<b>Attending Stakeholders</b>						
#	First Name	Surname	Sex (M/F)	Place of Residence (community, district)	Position	Contact Details (telephone, email) Signature
1	Mr. Mustapha	ADAM	M	Katsina	ACE	0908549634 [Signature]
2	Faizal	UMAR	M	Katsina	H.C. Lands	08016047825 [Signature]
3	Muhammad	KATO	M	Katsina	PS	08057616574 [Signature]

Discussions with MoEnv and Ministry of Lands and Survey, Katsina

Discussions with MoEnv and Ministry of Lands and Survey, Katsina

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4	Abankwa	I. Yar-ada	M	Katsina	Env. Forestry	0803032714 [Signature]
5	Dr. Yusuf	GIDE	M	KATSINA	Special Change	08037293434 [Signature]
6	Abdullahi	HUSAINI	M	KATSINA	Dir. Env. Admin	0814544725 [Signature]
7	Eng. Isaac Hassan	Kanawa	M	Katsina	Asst. Director Ecology	09037384900 [Signature]
8	Sadiq Abasi		M	Katsina	Director, Planning & RS	08129137514 [Signature]
9	Usman Adamu		M	Katsina	Head office	07068403663 [Signature]
10	Abubakar	MAKARA	M	MENG	CLO	0701040021 [Signature]

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11	Jibril Suleman	Damiro	M	MENG	CLO	0705184254 [Signature]
12	Abubakar	MUHAMMAD	M	MENG-KANO	CLO	0912041175 [Signature]
13	Leah	MARGELINO	M	KANO	ES Manager	09128873374 [Signature]
14	Eng. Sadiq Abdullahi		M	KANO	Project Mgr. Eng.	0705177968 [Signature]
15	Raphael	LASARI	M	Lagos	Special Scientist	0810209124 [Signature]
16	Pius	ADEJOH	M	Lagos	Special Specialist	0802559648 [Signature]
17	Balogun	Ukachi	M	Lagos	ES Specialist AFB	0803735876 [Signature]

Discussions with MoEnv and Ministry of Lands and Survey, Katsina

Discussions with MoEnv and Ministry of Lands and Survey, Katsina





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