



KADUNA STATE GOVERNMENT

Kaduna State Regulatory Authority (KADSTRA)



KADUNA BRT PROJECT

**Detailed Engineering Design, Procurement
and Construction Supervision (EPCS)**

Package 1

Resettlement Action Plan (RAP):

PRELIMINARY RAP REPORT (VERSION 2)

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Acronyms

Acronym	Full Meaning
AFD	Agence Française de Développement
BRT	Bus Rapid Transit
CAC	Corporate Affairs Commission
CDO	Community Development Officer
CPI	Consumer Price Index
EIA	Environmental Impact Assessment
EPCS	Engineering, Procurement and Construction Supervision
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
ESS5	Environmental and Social Standard 5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement)
ESS10	Environmental and Social Standard 10 (Stakeholder Engagement and Information Disclosure)
FGD	Focus Group Discussion
FMEnv	Federal Ministry of Environment
FRSC	Federal Road Safety Corps
GHGs	Greenhouse Gases
GIS	Geographic Information System
GRM	Grievance Redress Mechanism
ICA	Institutional Capacity Assessment
IDI	Infrastructure Delivery International
ITS	Intelligent Transport Systems
KADBRT / KBRT	Kaduna Bus Rapid Transit
KADGIS	Kaduna Geographic Information Service
KADRA	Kaduna Roads Agency
KADSTRA	Kaduna State Transport Regulatory Authority
KASUPDA	Kaduna State Urban Planning and Development Agency
KEPA	Kaduna State Environmental Protection Authority
KDSG	Kaduna State Government
KII	Key Informant Interview
LGA	Local Government Area

Acronym	Full Meaning
LUA	Land Use Act
MDA	Ministry, Department and Agency
MPW&I	Ministry of Public Works and Infrastructure
NDCs	Nationally Determined Contributions
NIN	National Identification Number
NMT	Non-Motorized Transport
NYSC	National Youth Service Corps (<i>only include if used; optional</i>)
ODK	Open Data Kit
PAC	Project Affected Community
PAI	Project Area of Influence
PAP	Project Affected Person
PMOD	Project Management and Operational Design
PMU	Project Management Unit
PPP	Public-Private Partnership
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
ROW	Right of Way
RSC	Resettlement Sub-Committee
SDG	Sustainable Development Goals
SEP	Stakeholder Engagement Plan
SES	Socioeconomic Survey
SPSS	Statistical Package for the Social Sciences
ToR	Terms of Reference
UNDP	United Nations Development Programme
UNDESA	United Nations Department of Economic and Social Affairs
WHO	World Health Organization

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EXECUTIVE SUMMARY

The Kaduna Bus Rapid Transit (KBRT) Project represents a major initiative by the Kaduna State Government to modernize urban transportation and address the growing challenges of congestion, inefficiencies, and environmental impacts associated with rapid urbanization. As part of this process, a Preliminary Resettlement Action Plan (RAP) has been prepared to ensure that potential social impacts arising from project implementation, particularly physical and economic displacement are properly identified, assessed, and managed in accordance with both Nigerian legal frameworks and international best practice, notably the World Bank Environmental and Social Standard 5 (ESS5).

The KBRT system will provide a structured, high-capacity public transportation network along a major corridor in Kaduna metropolis, covering approximately 44 km, with a priority focus on a central section of about 25 km. The project includes key infrastructure components such as road widening, construction of dedicated BRT lanes, development of terminals and stations, bridge expansion, pedestrian facilities, and relocation of essential utilities including electricity, water, and telecommunications networks. The implementation of these components is expected to improve accessibility, reduce travel times, enhance road safety, and decrease carbon emissions, thereby contributing to improved urban quality of life and sustainable development.

The project corridor traverses densely populated and commercially active areas within Kaduna metropolis, including key locations such as Kawo, Sabon Tasha, and the central market district (Kasuwa). These areas are characterized by high economic activity, informal trading, and limited available space within existing road rights-of-way. As a result, while the project is expected to deliver significant benefits, it also presents a risk of displacement; both physical and economic, particularly in areas where road expansion or infrastructure development intersects with existing structures and livelihood activities.

Preliminary assessments indicate that physical displacement under the project is likely to be relatively localized and limited to specific sections of the corridor where structures encroach on the right-of-way or where motor parks are to be redeveloped into BRT terminals. These impacts may involve removal of informal or semi-formal structures, relocation of transport-related facilities, and potential resettlement of tenants or occupants. In contrast, economic displacement is expected to be more widespread, particularly affecting street traders, informal vendors, and small businesses that rely on roadside access and high pedestrian traffic. Restrictions on access during construction, changes in traffic patterns, and reduced visibility of roadside businesses may result in temporary or permanent loss of income if not properly mitigated.

The RAP identifies several categories of Project Affected Persons (PAPs), including informal traders and vendors operating within the road corridor, owners and tenants of

commercial structures, transport operators and users of existing motor parks, and vulnerable groups such as women, elderly persons, and persons with disabilities. These groups may experience varying degrees of impact depending on their level of dependence on the project corridor for livelihood or residence. Particular attention is placed on vulnerable populations to ensure that mitigation measures are inclusive and equitable.

In recognition of these potential impacts, the RAP is guided by a set of key principles aimed at ensuring fair and sustainable outcomes. These include avoidance or minimization of displacement wherever feasible through design modifications, provision of compensation at full replacement cost, restoration or improvement of livelihoods, meaningful consultation with affected stakeholders, and the establishment of accessible grievance redress mechanisms. These principles align with ESS5 requirements and address identified gaps in national legislation, which traditionally focuses on compensation for physical assets rather than broader livelihood restoration.

Stakeholder engagement has been a central component of the RAP preparation process. A series of consultations, public meetings, and institutional workshops have been conducted with government agencies, community representatives, transport unions, business groups, and other stakeholders. These engagements have helped to identify key concerns, including the potential impact on livelihoods, the need for transparent compensation processes, and the importance of continuous communication throughout project implementation. Feedback from stakeholders has informed the design of mitigation strategies and reinforced the need for inclusive and participatory planning.

The RAP preparation approach follows a structured and phased methodology. This includes preliminary studies and reconnaissance surveys to identify potential impact areas, detailed field surveys involving enumeration of affected persons and assets, and socioeconomic assessments to understand the characteristics and vulnerabilities of affected populations. The process also includes asset valuation, development of entitlement frameworks, and preparation of livelihood restoration strategies. These activities will serve as the basis for subsequent phases of RAP development once detailed engineering designs are finalized and impacts are fully defined.

The legal and policy framework underpinning the RAP combines national regulations such as the Nigerian Constitution, the Land Use Act, and Kaduna State land administration laws with international standards, particularly ESS5. While national laws provide the legal basis for land acquisition and compensation, gaps exist in areas such as livelihood restoration, support for informal occupants, and stakeholder participation. The RAP addresses these gaps by adopting higher standards that prioritize the welfare and long-term sustainability of affected communities.

Overall, the Preliminary RAP demonstrates that while the KBRT Project will generate significant developmental benefits for Kaduna State, careful planning and implementation of resettlement and livelihood restoration measures are essential to ensure that affected persons are not left worse off. By integrating international best

practices, engaging stakeholders throughout the project lifecycle, and prioritizing social inclusion, the RAP provides a framework for managing displacement impacts in a way that supports both project success and community wellbeing.

CHAPTER ONE: INTRODUCTION

This document presents the Inception Report for Resettlement Action Plan (RAP) for the proposed infrastructure works for Kaduna Bus Rapid Transit (KBRT) scheme. The report describes preliminary services undertaken in line with the required studies for the preparation of a Resettlement Action Plan (RAP) for the corridor as identified in the 2020 Systra Feasibility Study report and early engineering design work done by the Engineering, Procurement & Construction supervision (EPCS) consortium - AEC/HHO/IDI.

1.1. Overview of the Kaduna Bus Rapid Transit (KBRT) Project

Transportation acts as a primary agent of globalization, facilitating trade through the movement of goods and services, connecting communities through the movement of people, and linking towns, cities and nations. The quality of transport has a profound economic and social impact on our communities, regarding trade (freight transport) and city liveability (public transport systems). (World Bank 2024)¹ Nigeria, like many low- and middle-income countries (LMICs), faces rapid and often unplanned urbanization, rising transportation costs, traffic congestion, rising transportation-based emissions and worsening air pollution, contributing significantly to the changing climate.

Globally, urban population growth and increasing environmental concerns are among the primary drivers accelerating investments in mass transportation systems. An efficient transportation system, comprising a multimodal mobility infrastructure such as a Bus Rapid Transit (BRT) is a hallmark of a modern city. A BRT system is one of the best strategies for urban transportation, especially in developing cities, mainly because of its cost-efficiency, easily adaptable technology, among several other advantages. BRT systems contribute to the qualitative improvement of urban spaces, modernization of vehicle fleets, reduction in greenhouse gases (GHGs) emissions, and enhancement of road safety (Severino 2022).²

The global BRT systems market is experiencing significant growth as urban centres increasingly adopt sustainable transport solutions. As of 2024-2005, it is estimated that between 200 and 250 cities worldwide operate BRT systems, with over 400 dedicated corridors globally, and a total corridor length exceeding 7,000 km, serving 35+ million daily passengers primarily in Latin America, Asia, and Africa (www.brtdata.org). Cumulative global investment in BRT infrastructure surpasses \$200 billion, with average corridor costs of \$10-50 million/km depending on features like busways and stations. In China, India, Colombia, Brazil and other countries, recent expansions add 500+ km annually at \$15bn/year (World Bank, 2021). BRT

¹ <https://www.worldbank.org/ext/en/topic/transport>

² <https://www.sciencedirect.com/science/article/pii/S2666691X22000288>

growth is fuelled by increasing congestion in metropolitan areas, particularly in developing economies where urban populations are expected to surpass 3.5 billion by 2030.

Internationally, transport is an important source of air pollution and generates the fourth largest share of GHGs emissions (WHO, 2025)³. The sector is responsible for 13.7% of global GHGs emissions (UNDP, 2025).⁴ Therefore, promoting sustainable transportation on land includes shifting from private vehicle use to low-emission public transport such as the BRT systems in locations of high population concentration.

In Nigeria, transportation is a major source of CO₂ and air pollutants in cities and towns (Eyinade, 2025)⁵ including Lagos, Kano, Abuja, Kaduna, Ibadan, Port-Harcourt, Aba, Makurdi and Maiduguri among others. Kaduna metropolis is experiencing overwhelming traffic congestion across its metropolitan area and environ, resulting in loss of man hours, reduction in livelihood earnings and Government revenue as well as increased emission of GHGs, thereby contributing to climate change.

The Kaduna State Government (KDSG) is poised to tackling the existing transportation challenges in Kaduna metropolis through the modernization of its public transport system by deploying a BRT system for Kaduna metropolis. The proposed Kaduna BRT system is envisioned as a high-quality, low-cost public transportation system operating on specialized infrastructure with adequate incentives to offer affordable mobility, sustainable urban environment and better quality of life to the urban population, especially the middle- and low-income earning group.

The proposed project aims to drastically reduce traffic congestion, boost mobility, enhance affordability, create jobs and reposition Kaduna as a modern, climate-resilient city through the reduction in carbon emissions. Furthermore, the project aligns with the Sustainable Development Goal (SDG) 11, Target 2 which states, inter alia: *“By 2030, provide access to safe, affordable, accessible, and sustainable transport systems for all, notably by expanding public transport”*. The project also aligns with Nigeria’s Nationally Determined Commitments (NDCs) to the UNFCCC 2015 Paris Agreement, specifically targeting the reduction of vehicular emission by the adoption of buses as against single vehicle use. In this regard, the proposed

³ WHO (2025) Transport: sectoral solutions for air pollution and health:
<https://www.who.int/publications/i/item/B09368>

⁴ UNDP (2025) What is sustainable transport and what role does it play in tackling climate change?
<https://climatepromise.undp.org/news-and-stories/what-sustainable-transport-and-what-role-does-it-play-tackling-climate-change>

⁵ Eyinade, A (2025) Mainstreaming Climate Action into Nigeria’s Transportation Sector:
<https://afripoli.org/mainstreaming-climate-action-into-nigerias-transportation-sector>

Kaduna BRT system is expected to serve 160,000 commuters daily and benefit over 100,000 residents directly.

The proposed BRT project is a project conceptualized and to be co-funded by the KDSG and the Agence Francaise de Developement (AFD). The project involves an extended 44 Km service route running from Rigachikun to Mararaban-Rido, 27 km of which will run in direct service mixed traffic lanes, and 17 km of which will have been constructed at the completion of the EPCS project. Similar services will run spurs proposed towards Mando Road, Eastern by-pass, Millenium City and Gonin-Gora with all end-to-end routes passing through the city centre as per the updated Operational Plan.

Apart from the services running in mixed traffic lanes, a limited 17 km stretch of BRT busway infrastructure is currently being proposed to be constructed within the available budget within the EPCS project, forming part of the full BRT design for the 25 km Kawo-Refinery Junction Red Route required to be designed in the EPCS Terms of Reference. The design involves expansion of the roads by widening the existing lanes where required and/or construction of additional lanes, bridge expansion across the River Kaduna, construction of bus terminals, bus depots, bus stations and bus stops at different locations along the route.

1.2. Project Proponent

The proposed Kaduna BRT project's proponent is KADSTRA, established in 2017 by the KDSG to regulate all transportation and transport related activities within the state. In addition, KADSTRA is responsible for the management and development of transportation infrastructure in Kaduna metropolis and all other towns in the state, and is empowered by law to construct, re-construct, maintain and manage transport infrastructure and facilities in Kaduna State.

1.3. Project Location

Kaduna Metropolis, the capital of Kaduna State, is located between latitudes 10° 24' 39" N and 10° 36' 40" N and longitudes 7° 21' 26" E to 7° 30' 3" E (Figure 1.1) and has witnessed rapid urbanization, high population density, and acute transportation challenges. The wider Kaduna Urban Area covered 311 sq km in 2025 with a population of nearly 1.9 million (UNDESA 2025).⁶ The metropolis extends into 4 LGAs (all of Kaduna North and Kaduna South, and parts of Chikun and Igabi), including major neighborhoods such as Angwan Rimi, Kawo, Angwan Sanusi, Malali, Ungwan Sarki, Ungwan Kanawa, Hayin Banki, Abakwa, Rigasa, Kakuri, Kawo, Barnawa, Narayi, Rigachikun, Maraban Rido, Sabon Tasha, etc.

⁶ The UN estimate of Kaduna's population for 2025 is 1.89 million. (World Urbanization Prospects 2025, UN Department of Social and Economic Affairs, Population Division: <https://www.un.org/development/desa/pd/data-landing-page>)

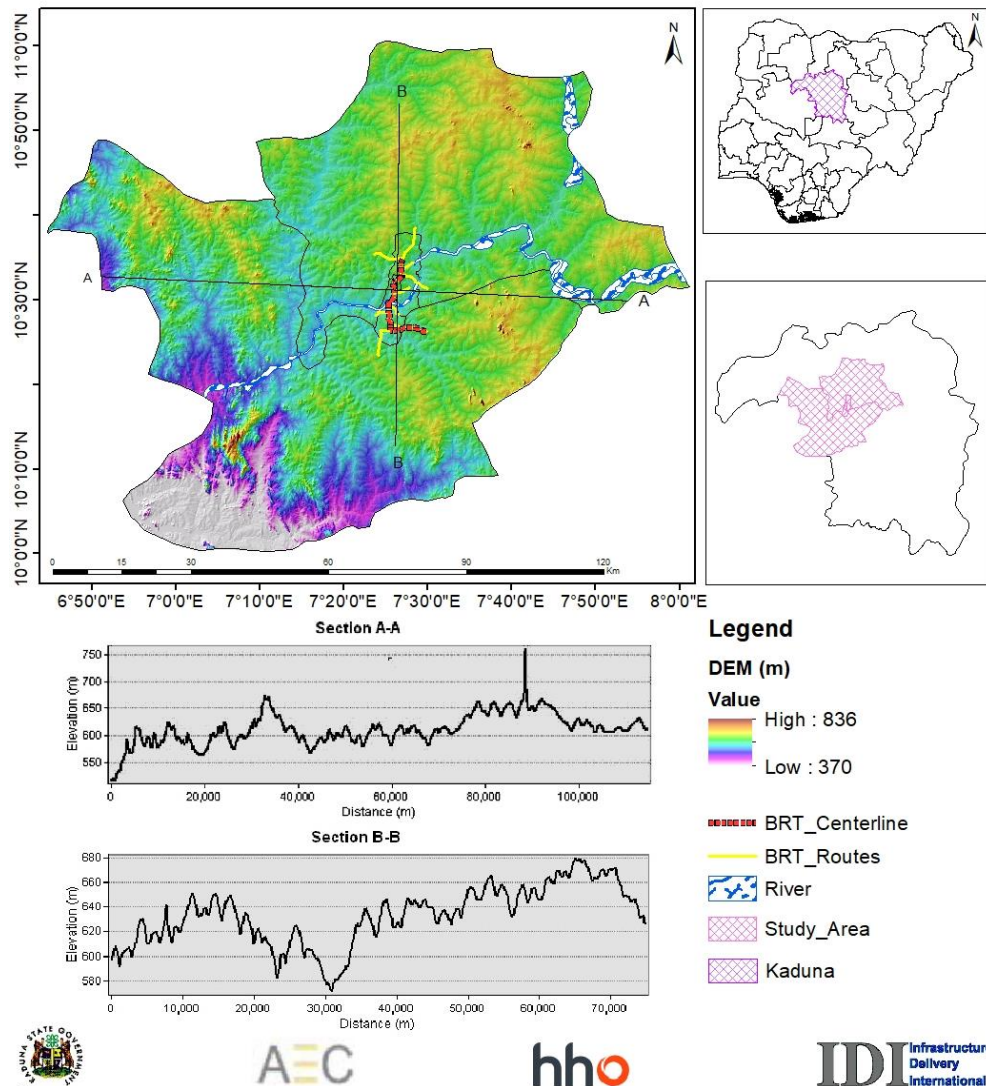


Figure 1.1. Map of Nigeria showing Kaduna State and the 4 LGAs comprising the Kaduna Capital Territory Authority within the state

This chapter presents the technical description of the proposed Kaduna BRT Project (which traverses Igabi, Kaduna-North, Kaduna-South and Chikun LGAs - the Kaduna Capital Territory Authority in Kaduna State), its integral components, material input and output, waste streams, project implementation schedule and deliverables among others. The proposed BRT project was conceptualized by the KDSG as a solution for freeing Kaduna metropolis from the debilitating traffic congestions and enhancing/improving urban mobility.

The key components of the proposed BRT project include:

- i. Bridge expansion;
- ii. Road expansion;
- iii. Construction of dedicated BRT lanes;
- iv. Construction of Bus Terminals;

- v. Construction of Bus Stations;
- vi. Provision of street lighting within the Terminals;
- vii. Provision of water/water supply;
- viii. Relocation of utilities such as water lines, telecommunication & electricity cables & underground drainages/manholes;
- ix. Construction of road furniture;
- x. Underground fuel dump/storage area;
- xi. Road marking;
- xii. Other facilities required for the operation of BRT services.
- xiii. Arrangements during the construction of the BRT infrastructure.

1.4 Project Terms of Reference and Subsequent Update

Based on the earlier Systra Feasibility Study findings and recommendations, Kaduna State, KADSTRA and AFD agreed to conceive the project under AFD's assistance as the 24-km BRT corridor from Kawo to Sabon Tasha (Route 1 in the ToR). An extension to the Refinery Junction a short distance beyond the Sabon Tasha Hospital was subsequently confirmed.

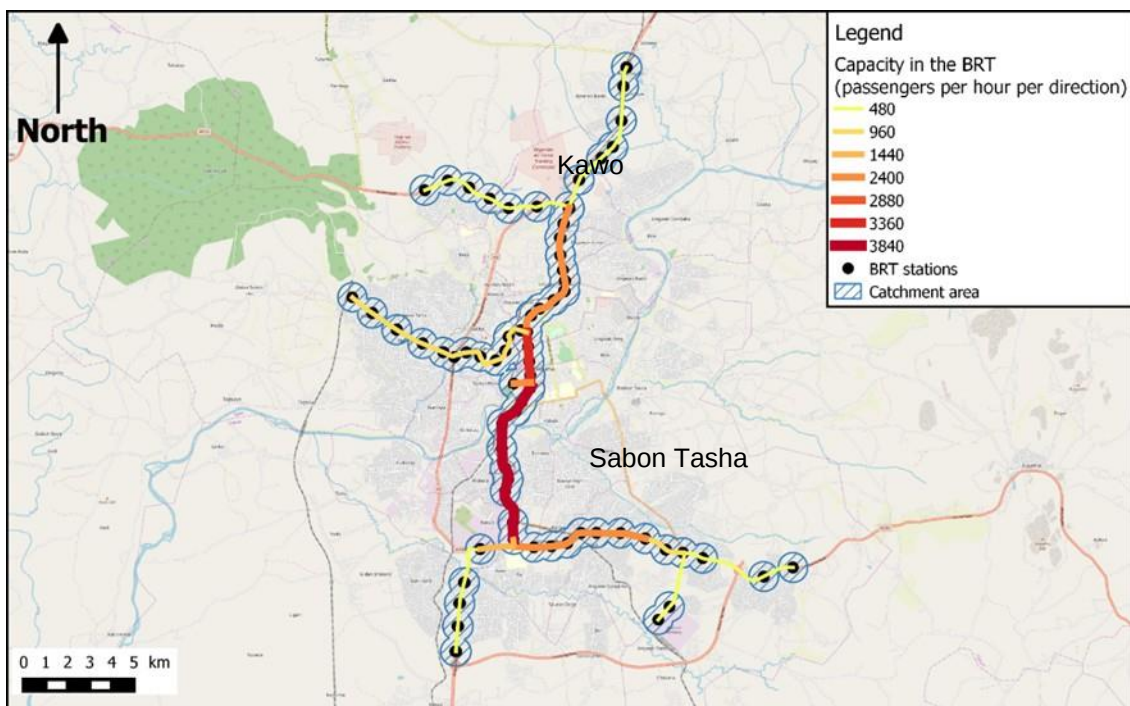


Figure 1.2: The Project as described in the Project Terms of Reference

The project as set out in the ToR consist of the following two interlinked activities.

Activity 1 (Infrastructure): BRT Corridor - addressed by Package 1: Detailed Engineering Design, Procurement and Construction Supervision (EPCS).

This focuses on construction of;

- (i) a BRT corridor designed and built following international best practices and quality standards;
- (ii) sidewalks, on-street parking, mixed-traffic lanes and non-motorized transport lane along the BRT;
- (iii) a high-capacity drainage system along the corridor;
- (iv) BRT depot; and
- (v) improvement of access roads for non-motorized transport (NMT) and potential feeder services. Energy-efficient streetlights and intelligent transport systems for traffic management along the corridor will also be procured and installed under this output.

Activity 2: Effective project management and sustainable BRT operations - addressed by Package 2: Project Management and Operational Design (PMOD).

This includes:

- (i) strengthening capacity of KADSTRA;
- (ii) structuring and delivering viable PPP arrangements;
- (iii) designing the BRT operational plan and business model;
- (iv) facilitating a bus industry transition through negotiations and capacity building for private bus operators selected to operate the BRT;
- (v) set up compensation mechanism for excluded private operators;
- (vi) building capacity of the traffic police to enforce parking, street vendors' policy, and other traffic rules;
- (vii) implementing a communication and marketing plan; and
- (viii) implementing an urban development strategy along the corridor.

The EPCS contract is composed of two missions and 7 outputs and related activities and milestones as Table 1:

Table 1: Key Activities and Milestones of the EPCS Project

MISSION 1. Detailed Engineering Design and Procurement.		
1.	Output 1	Field Surveys and Investigation
2.	Output 2	Detailed Design
3.	Output 3	Bidding Documents
4.	Output 4	Contractor(s)' Selection
MISSION 2. Construction Supervision.		
5.	Output 5	Contract Management
6.	Output 6	Project Management, Quality Control and Construction Super
7.	Output 7	Social and Environmental Safeguards

Mission 1 includes all Resettlement-related activities under Output 2.11. Resettlement Action Plan (RAP) and 2.12 RAP Implementation Support to be carried

out before construction. In parallel, closely related environmental and social assessments are being carried out under Output 2.13. Environmental and Social Assessment Plan monitoring and surveys,

Output 1 is largely complete including Output 1.7 Base Maps and Digital Terrain Mapping, delayed by challenges in obtaining the required digital datasets. Final reports on Outputs 2.11 and 2.12 were programmed for weeks 12 and 16 respectively in the ToR but the schedule is currently under review given subsequent developments.

As part of the forthcoming deliverable the lead EPCS consultant has undertaken an in-depth review of the Concept Design presented in Systra Feasibility Study Output 1 Final report. The Design Review and Value engineering evaluation of key corridor sections is intended to assess whether the proposed design is the most cost-effective solution for local conditions, takes sufficient account of international BRT design and operations practice, and is in accord with the results of the surveys (Mission 1 Output 1) and the refined operations plans to be developed in Package 2.

As well as conducting a value engineering evaluation of key roadway and terminal segments to determine if lower-cost alternatives are viable the EPCS is required to address the Update Service Plan as presented in the PMOD consultants Output 6.5. Operational Design for BRT Services in November 2025.

This has been a fundamental and wide-ranging review of and update to the proposed service plan as set out in the Systra Feasibility Study with substantial implication for the EPCS Conceptual Design review.

1.5 Updated Service Plan and Proposed Alignment the EPCS BRT Corridor

The Updated Service Plan:

This network was presented in the November 2025 update to the Operational Plan under Component 2 of the project: Bus Fleet and Systems - Project Management and Operational Design (PMOD), led by Rebel Group with Arctic Infrastructure. The update represents a substantial revision to the original Systra Feasibility Study, which formed the basis of the Terms of Reference for KBRT components.

Background and Need for Revision:

As noted in the PMOD report: “The Systra Operational Design left a large number of passengers, including more than half of the passengers using the proposed BRT trunk corridor, using informal auto rickshaws and minibuses in the mixed traffic lanes. Given that the current proposal reduces mixed traffic to one lane in some sections,

it is important to move as much transit demand as possible inside the BRT infrastructure.”

In addition to the proposed Phase 1 BRT corridor being addressed by the EPCS project, the Systra/AFD conceptual design developed a seven-route operational plan (Figure 1.3).

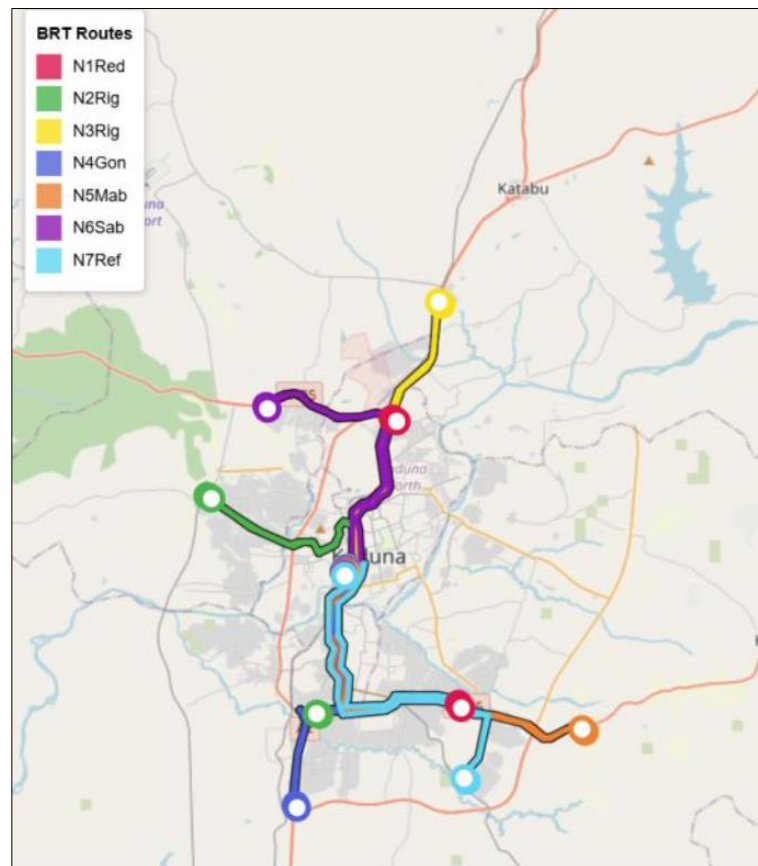


Figure 1.3: Systra-proposed seven-route system service plan

PMOD concluded that the seven-route proposal omitted many existing routes using the proposed corridor and failed to capture significant demand identified in the origin-destination matrix. It also departed from accepted network design principles by terminating too many services in the city centre, creating unnecessary transfers.

The proposed services also did not form a grid network, contained redundant trunk-corridor services, and missed demand that could have been captured without adding route kilometres. In addition, the central hub site proposed in the Systra Feasibility Study on Katsina Road was unavailable. An alternative site was identified by KADSTRA at the Kwantin Kwari Motor Park off Ahmadu Bello Way, although this is not currently required for that purpose.

Updated Operational Design:

The seven-route Systra proposal was used as the starting point for the PMOD revised operational design. The review identified all formal bus services that should operate in Kaduna, whether or not they interact directly with the BRT trunk corridor.

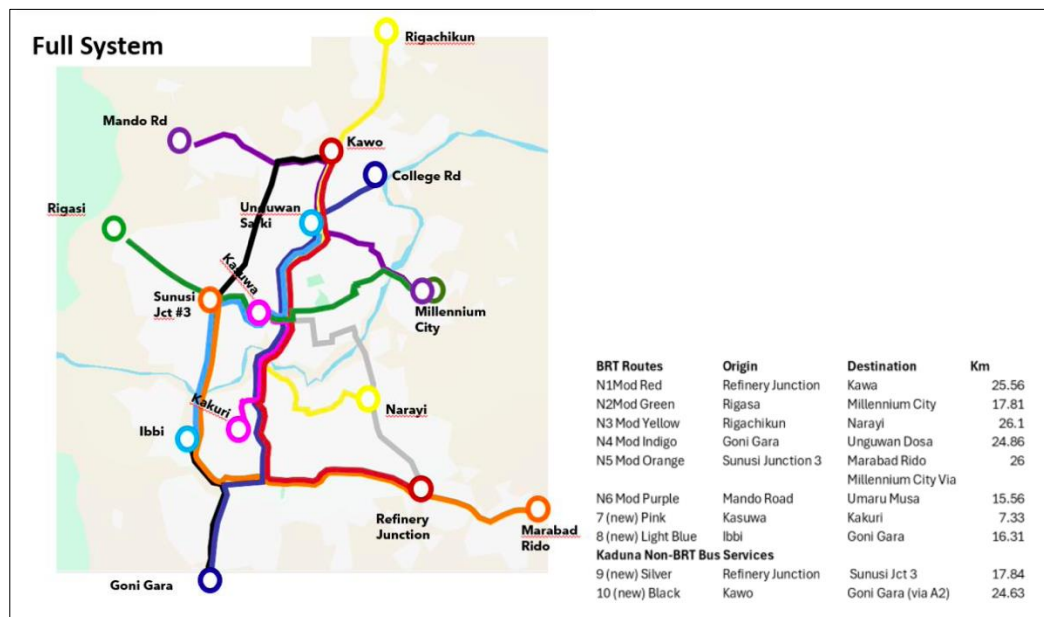


Figure 1.4: Full BRT and non-BRT bus system - all phases as proposed in the updated Operational Plan

Figure 1.4 shows the complete proposed Kaduna BRT Project service plan as currently proposed, comprising ten routes to be developed in phases. Nine routes pass through the city centre with origins and destinations outside the central area, except the Pink Line, which originates in Kasuwa (the central market zone). Route 10, the Black Line, runs north-south along the Western Bypass. Routes N1 to N8 are planned to operate in BRT infrastructure, while Routes 9 (Silver) and 10 (Black) are planned as non-BRT services operating in shared traffic lanes.

Preliminary demand analysis assumes these services will capture passengers currently using similar routes. Under this assumption, the full network is expected to carry approximately 120,632 passengers per day at the start of operations, increasing to around 264,000 daily passengers over 20 years. This would require an initial fleet of 242 buses, all of which could be 12-metre vehicles.

Phase 1 Service Operations:

Systra proposed multiple service plans to operate on the corridor. The Operational Design endorsed by the client included only three services:

Red Route: From Kawa to the Sabon Tasha Hospital, the same as the proposed BRT Infrastructure. 18-meter buses

Yellow Route: From north of the proposed BRT trunk corridor at Rigachikun to the proposed central bus terminal in Kasuwa. 12-meter buses.

Orange Route: From the downtown bus terminal in Kasuwa to the market town of Maraban Rido to the east of Kaduna beyond the BRT infrastructure which they recommended stop at Sabon Tasha Hospital. 12-meter buses.

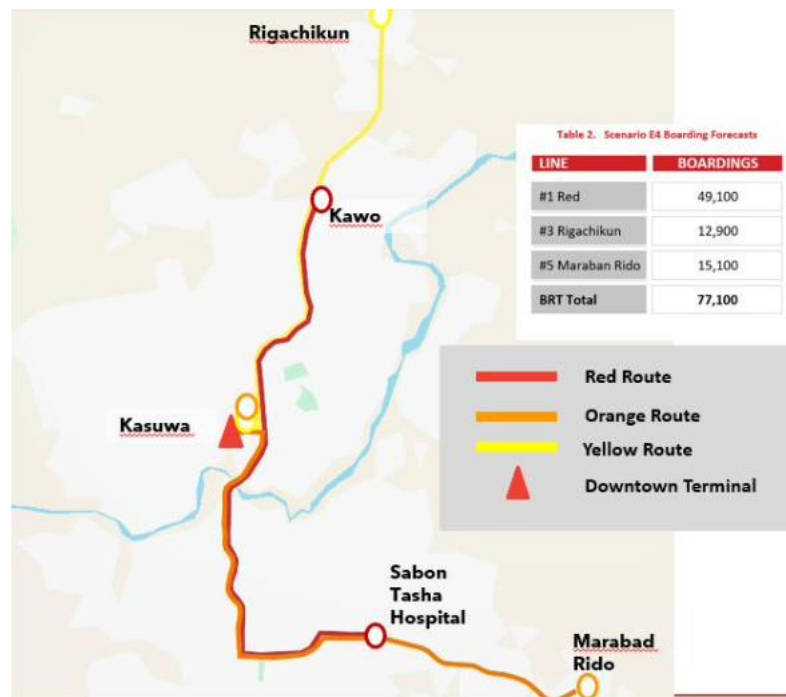


Figure 1.5. Preferred Operational Design proposed by Systra/AFD in the conceptual design state

The Phase 1 Service Plan as proposed in the Operational Plan includes five routes adapted from the full Service Plan network:

- N1 Red
- N3 Yellow
- N4 Indigo
- N6 Purple
- N7 Pink

Except for sections operating on the new Red Line BRT infrastructure, these services will run in shared traffic lanes on existing roads. All five routes will use the BRT trunk corridor through the city centre. The Red Route (revised to follow the original alignment as in the EPCS ToR as in Figure 1.5) forms part of an extended route from Rigachikun in the north through Kawo and the city centre to Command Junction and Refinery Junction shortly beyond Sabon Tasha in the southeast. Together with the Yellow Line (Rigachikun to Narayi), this provides coverage across the four LGAs of Igabi, Kaduna North, Kaduna South, and Chikun.

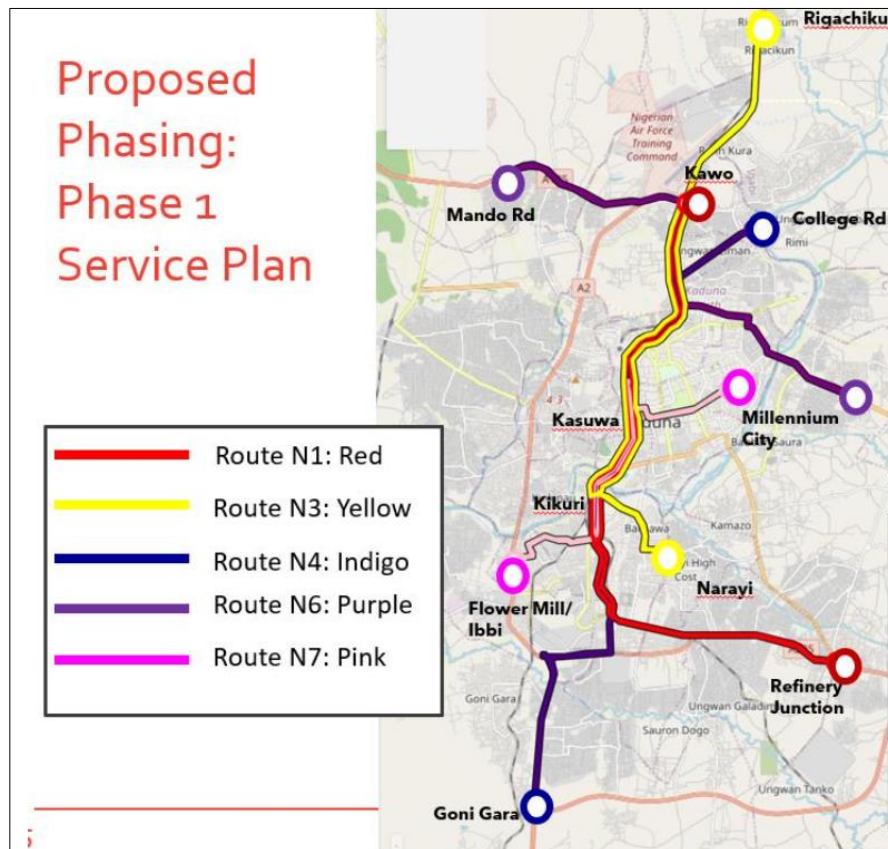


Figure 1.6: Phase 1 services as proposed in the updated Operational Plan

Demand and Fleet Requirements:

This proposed Phase 1 would have about 100,000 daily passengers and would require a fleet of around 108 buses, including 18 18-meter buses, and 90 12-meter buses (inclusive of a 7% reserve fleet). It set the minimum frequency at 6 buses per hour.

By comparison, Systra estimated demand at around 77,100 daily passengers using its own transit model based primarily on household origin-destination survey data, with 72 vehicles required based on fixed frequencies.

Phase 1 Infrastructure and Service Plan:

The EPCS (Engineering Design, Procurement and Construction Supervision) Project is designing Phase 1 of the BRT system along the trunk corridor from Kawo in the north, through the city centre, to Refinery Junction just beyond Sabon Tasha in the southeast. In the updated Operational Plan, this route follows the original Red Route in the Systra Feasibility Study, with a short extension to the Refinery Junction (beyond the Sabon Tasha Hospital), and covers approximately 25 km (see Figure 1.5).

Construction of the BRT infrastructure is proposed in two stages.

The first stage extends approximately 17 km from Kawo to Command Junction, south of the river. This is the section currently proposed for construction under the EPCS project. The final extent has been agreed following revised cost estimates and an

updated conceptual design at the meeting with the Governor on 6 May during the recent visit of the AFD Mission. The remaining extended Red Route infrastructure corridor to the Refinery Junction being designed under the EPCS project is proposed for a later, Phase 3 construction.

Infrastructure Responsibilities:

The wider BRT project will include road widening, reserved busways, bridge expansion across the River Kaduna, bus terminals, depots, and stations. It will also require relocation of utilities including water lines, telecommunications and electricity infrastructure, and underground drainage/manholes. However, the EPCS Terms of Reference do not include the design of service infrastructure for routes operating in mixed traffic lanes under the Phase 1 Service Plan. Responsibility therefore remains with KADSTRA, except for Clause 65 of the ToR, which requires conceptual designs for feeder shelters supporting off-corridor routes integrated with the trunk line.

1.6 Project Scope

Road infrastructure is a keystone for the efficient performance of BRT systems. The scope of a BRT project is subdivided into the following activities:

- Planning and design
- Infrastructure development
- Fleet procurement
- Intelligent Transport Systems (ITS)
- Environmental and social safeguards
- Operations and maintenance framework

1.7 Project Activities (Pre-construction)

The pre-construction phase comprises of the key activities such as Project Initiation & Setup, Conceptual & Operational Design, Detailed Design & Pre-Construction, and the EPC. Critical pre-construction activities include the following:

- **Utility Relocation**

This is often one of the first and most complex on-site activities. It involves physically moving existing underground and overhead utilities such as water pipes, gas lines, electricity cables, and poles and telecommunication networks that lie within the proposed path of the new BRT guideway or stations. This step is critical to clear the way for new construction and is a frequent cause of project delays if not managed carefully.

- **Right-of-Way Clearing**

This involves the clearing the area, which may include demolishing existing structures or removing obstacles to create a continuous path for the new dedicated bus lanes.

- **Traffic Management Setup**

This includes installing detour signs, setting up pedestrian walkways, and putting up safety barriers to manage the flow of vehicles and people around the construction site, ensuring safety for both commuters and workers

- **Pedestrian Crossings**

The concept designs consider that the traffic speed in mixed traffic lanes will be reduced to 50-60 km/h. Based on this assumption, it elevated pedestrian crossings may be considered although the current proposal is understood for traffic signal-controlled at grade pedestrian crossings. The final Government decision on this is to be advised given certain risks at the BRT stations:

1.8 Project Structural Design

Bus Corridor

A bus corridor is essentially a designated route or pathway along which bus services are prioritized or concentrated. As noted, the development of BRT infrastructure corridor will be done in phases with the first construction phase proposed to cover 17 km from Kawo through Kasuwa (City Centre market district) to Command Junction south of the Kaduna River where the route switches direction from southward to eastward (see Figure 1.7).

Roadway Configuration

The proposed Bus Rapid Transit (BRT) corridor spans a total length of 25 km. The existing roadway will be expanded to accommodate a dedicated dual BRT lane located at the median of the corridor. Each BRT Lane is designed with a width of 3.5 m.

On both sides of the BRT corridor, mixed-traffic carriageways will be provided, consisting of two lanes per direction, each with a width of 3.6 m, including a 0.3 m shy distance. The BRT lanes will be physically separated from the general traffic lanes using median kerbs of 1.2 m width to ensure operational safety and efficiency.

In constrained sections, particularly within the central business area where the Right-of-Way (ROW) is limited, the outer carriageway will be reduced to a single lane per direction, with lay-bys introduced to facilitate stopping without obstructing traffic flow.

Terminal and Depot

The project includes the development of two (2) BRT terminals, strategically located at the beginning and end of the corridor to serve as major passenger interchanges and operational control points. Additionally, a bus depot is proposed along the southern section of the corridor, which will serve as the primary facility for bus parking, maintenance, and operations management.

Station Configurations

Final details on the number of stations to be advised but stations will be provided along the corridor to ensure adequate coverage and accessibility. Each station will adopt a staggered sub-stop configuration to optimize space utilization and minimize congestion within station areas, especially in the constricted section in the central business district of Kaduna. The stations will be equipped with pedestrian crossing facilities for safe access, access ramps to support universal accessibility, and fare collection points for efficient passenger processing.

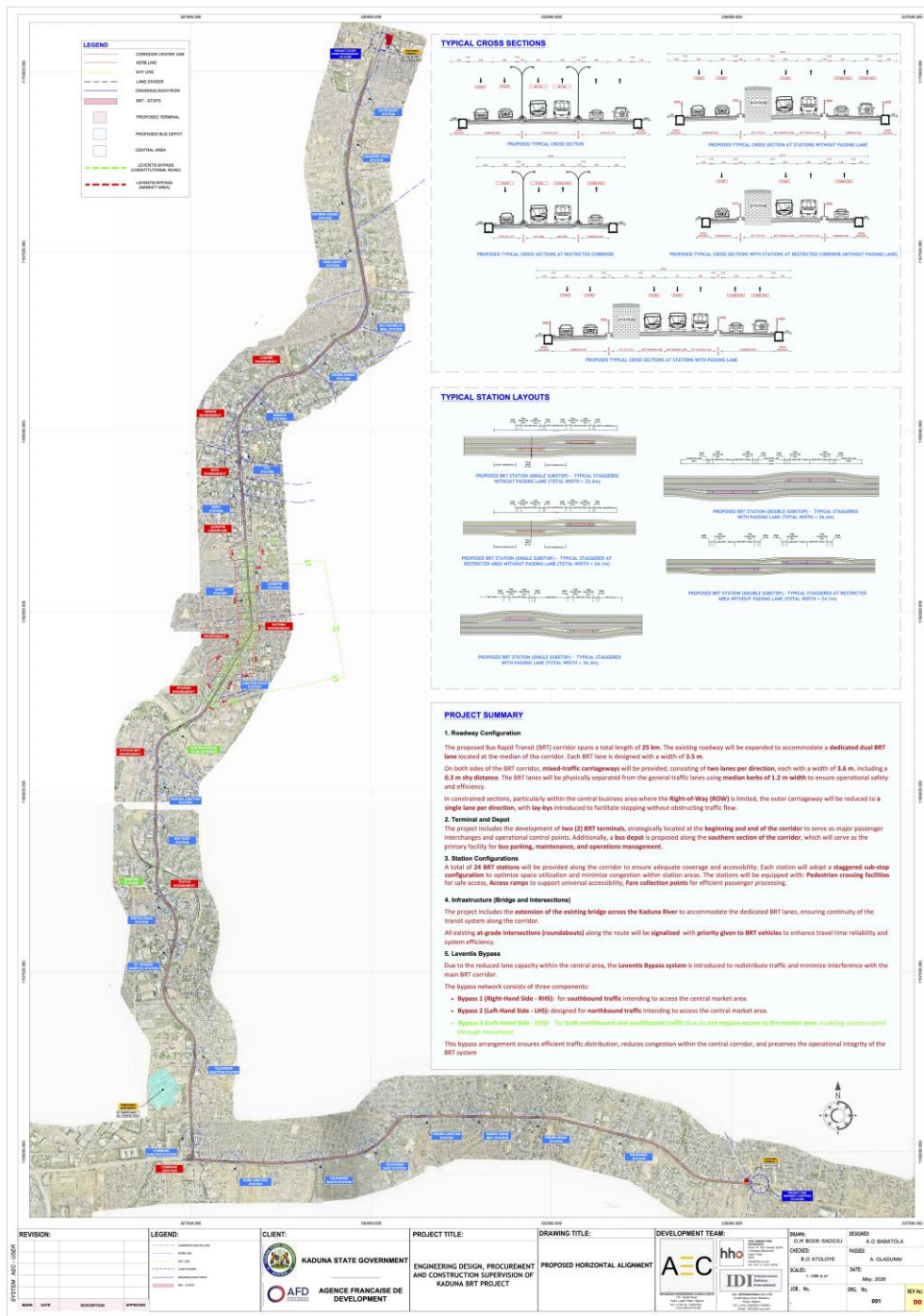


Figure 1.7: KBRT Proposed Corridor Alignment

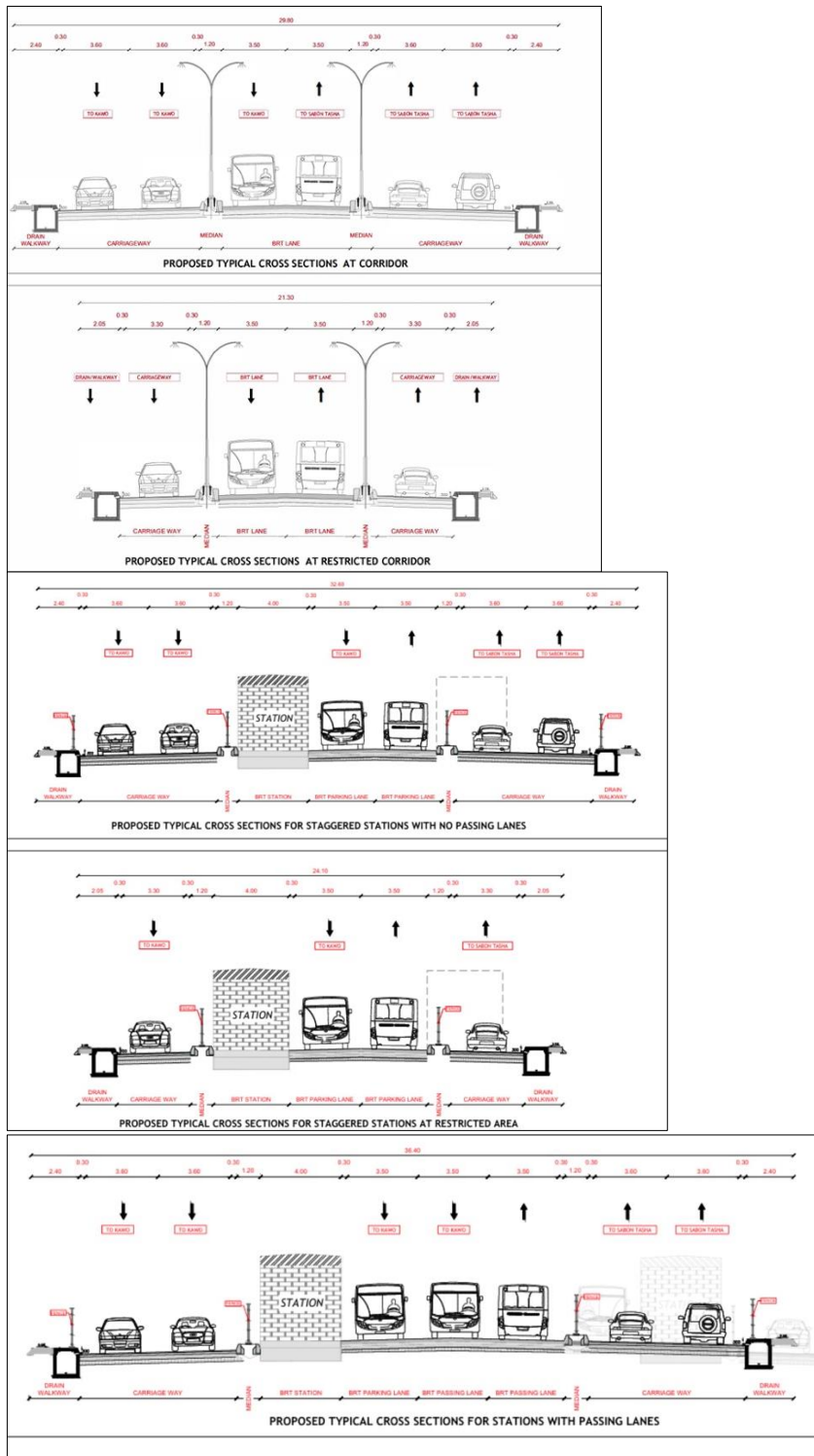


Figure 1.8: Typical Cross Sections

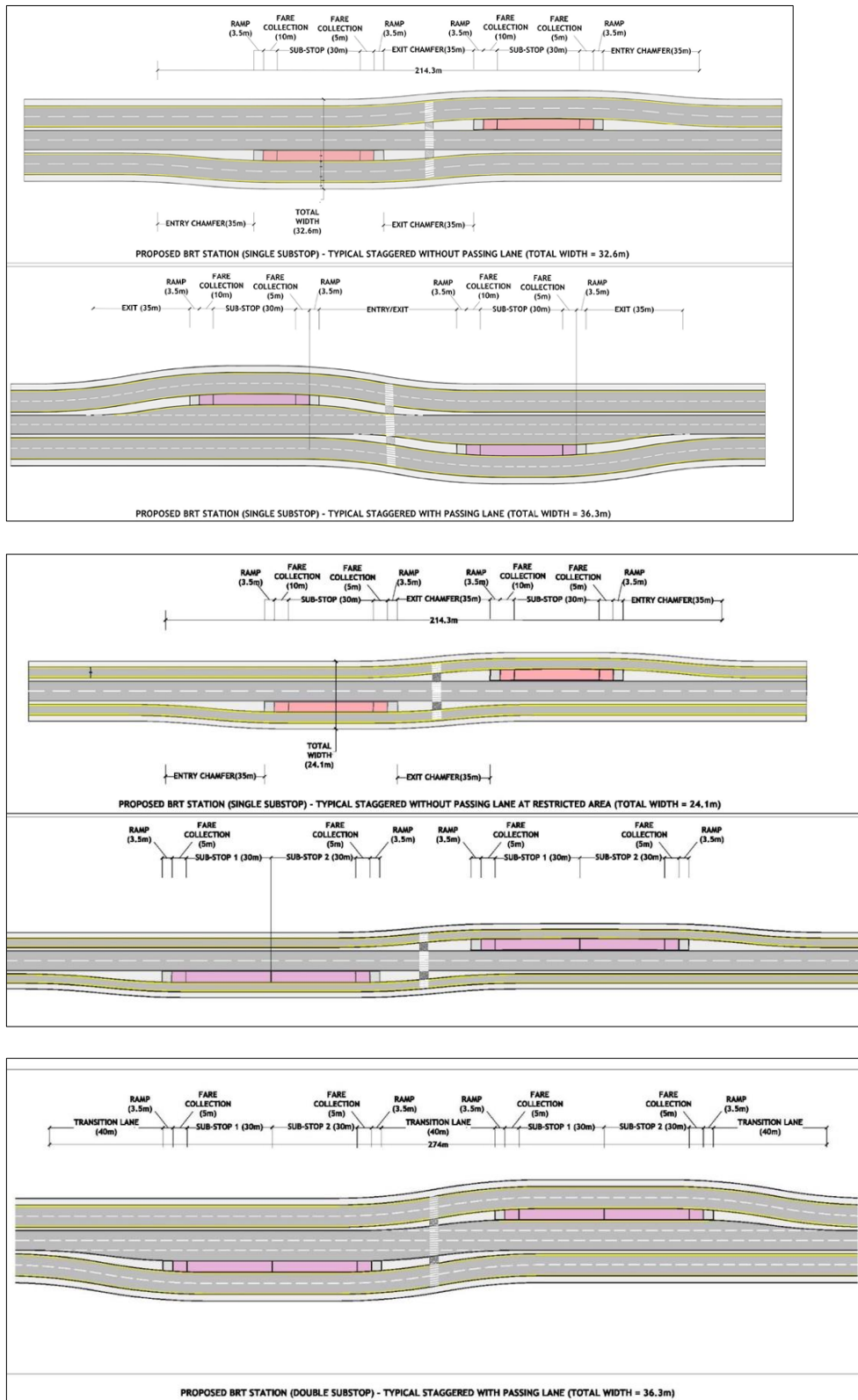


Figure 1.9: Station Plans
Infrastructure (Bridge and Intersections)

The project includes the extension of the existing bridge across the Kaduna River to accommodate the dedicated BRT lanes, ensuring continuity of the transit system along the corridor.

All existing at-grade intersections (roundabouts) along the route will be signalized with priority given to BRT vehicles to enhance travel time reliability and system efficiency.

Leventis Bypass

Due to the reduced lane capacity within the central area, the Leventis Bypass system is introduced to redistribute traffic and minimize interference with the main BRT corridor.

The bypass network consists of three components:

- Bypass 1 (Right-Hand Side - RHS): for southbound traffic intending to access the central market area.
- Bypass 2 (Left-Hand Side - LHS): designed for northbound traffic intending to access the central market area.
- Bypass 3 (Left-Hand Side - LHS): for both northbound and southbound traffic not intending to access the market area, enabling uninterrupted through movement.

This bypass arrangement ensures efficient traffic distribution, reduces congestion within the central corridor, and preserves the operational integrity of the BRT system. Note the arrows showing on Bypass 1 and Bypass 2 indicates the main direction of traffic flow. These roads will be two-way. Along with the side roads, this will facilitate flexibility in traffic management in the central city area.

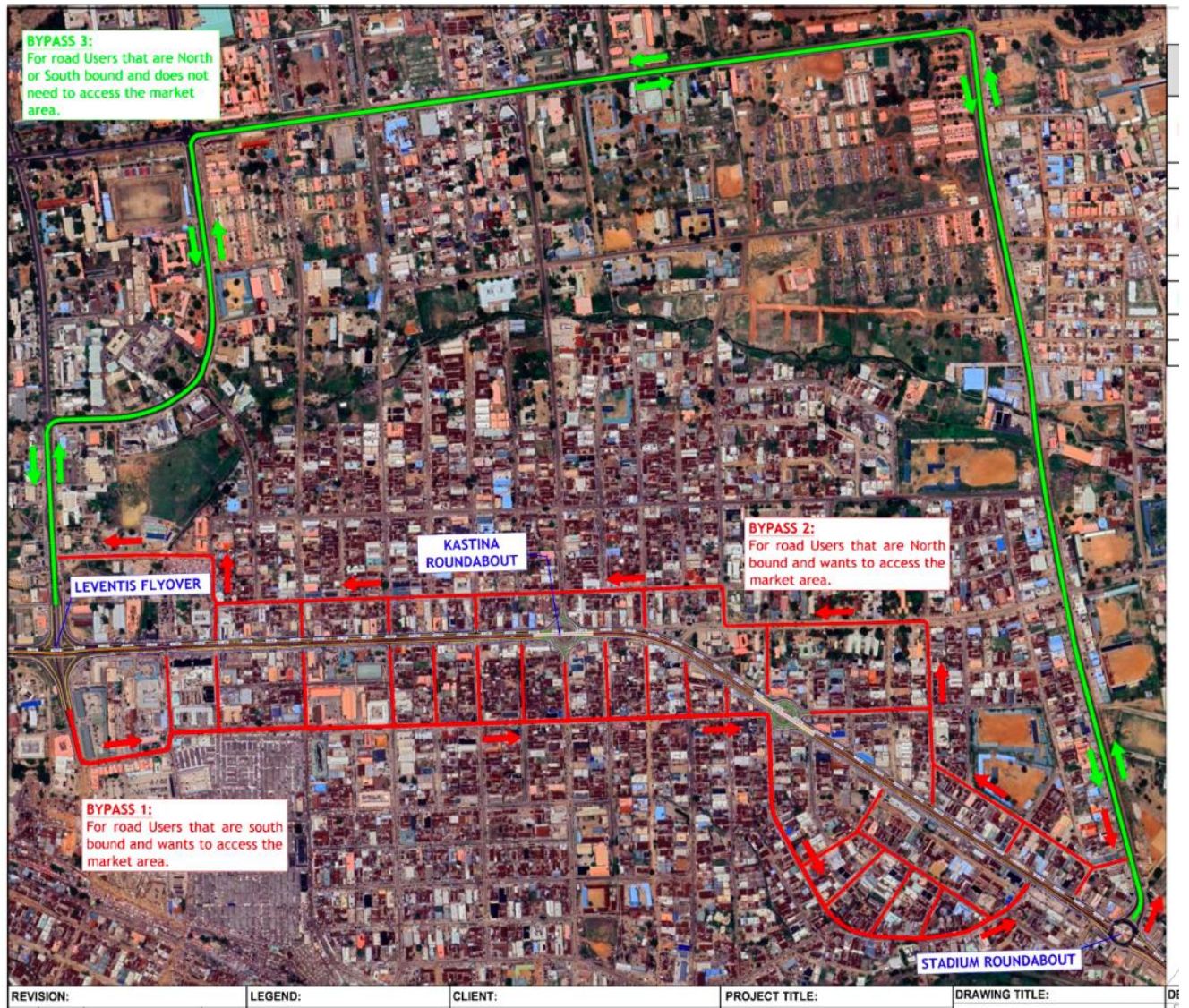


Figure 1.10: City Centre Bypass Network as alternative route

Depot and Terminals

Depot Design

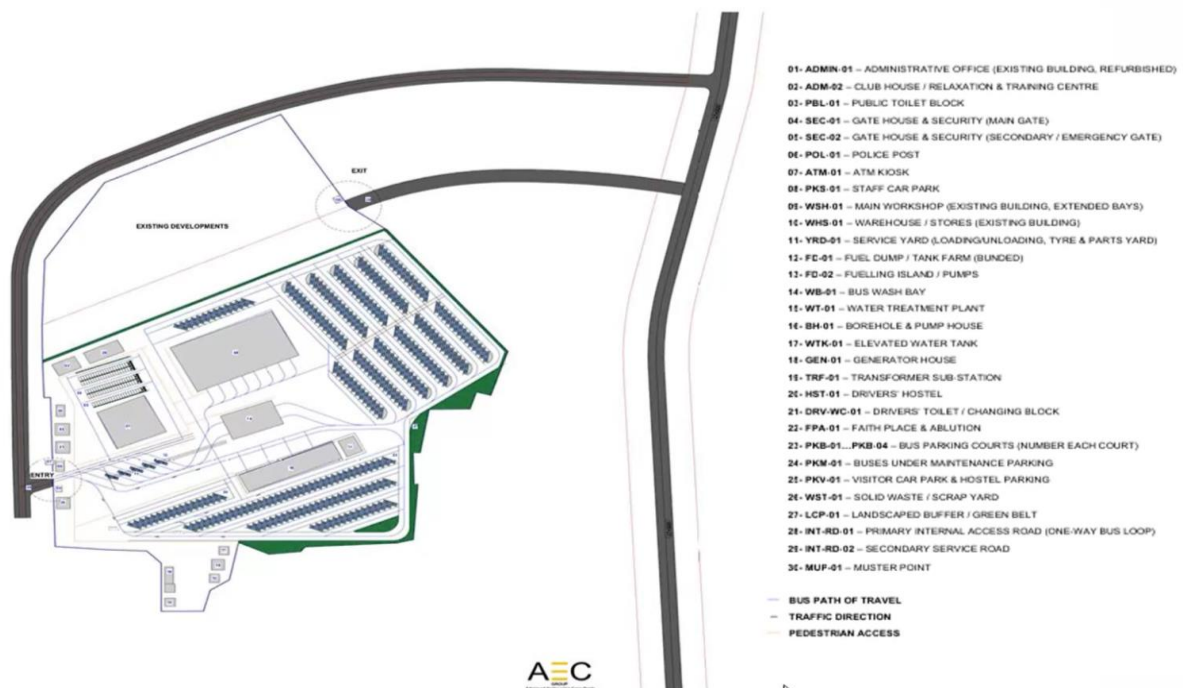


Figure 1.11: Depot design

BRT Lanes

Usually, the standard width of a BRT runway is 3.5m which shall be maintained in the project. Figure 1.8 and 1.9 shows the proposed BRT lanes in section and plan.

Bus Stations

BRT stations play a strategic role in enhancing the user experience, particularly through level boarding and the adoption of pre-payment systems. These features contribute to reducing dwell times at stops and improving overall operational fluidity. Stations are positioned in relation to the adjacent urban layout, but the system is optimized if they are close to pedestrian areas due to safety reasons. Table 1.1 shows the list of proposed bus station/ bus stops along the BRT route.

The Bus Stations will be comprised of the following facilities:

Station: the infrastructure used by pedestrians to buy tickets, board and alight the buses.

Ramp: the area used to access the elevated station, considering the slope that allows universal accessibility;

Ticketing, fare collection or access control area: this is the area where ticket booths, fare gates and security are located.

Sub-stop/modules: the area where buses of certain predefined routes dock at the stations. A station may have more than one sub-stop, each one serving specific routes. The sub-stops may be single, with space for one bus to dock, or double, with space for two buses to dock.

Platform: the area of the station where passengers board and alight, in sub-stops.

Docking position: the position where the bus stops at the station. In some sub-stops, there are 2 docking positions, meaning that the bus can stop in the first or second position.

Connection area: is the area of the station between the sub-stops which is not a platform for passengers to board and alight, because it represents the length necessary for buses to manoeuvre and wait to dock at the station.

1.9 Objectives of the RAP Study

The objective of this assignment is to prepare a RAP, which ensures adverse impacts resulting from physical and economic displacement are adequately identified, assessed and mitigated to achieve restoration of social and economic conditions of PAPs to pre-project levels or even better (where feasible). The RAP will include detailed information on PAPs whose livelihoods are likely to be adversely affected by the project activities. The specific objectives of the RAP are to:

1. Ensure that RAP preparation is consistent in policy and context to the laws, regulations, and procedures adopted by the Nigeria (at both National and Subnational levels); and compliant with the World Bank Environmental and Social Standards (ESS 5) on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
2. Conduct consultations with identified project PAPs, based on a census of the affected sites.
3. Establish local decision-making bodies who will be part of RAP implementation of valuation and compensation approaches.
4. Develop in a participatory manner the proposed Grievance Redress Mechanism (GRM) to be covered in the RAP; and complete a baseline socioeconomic survey of PAPs and host communities.

1.10 Scope of the RAP Study

This section outlines the intended scope and sequence of activities to be undertaken in subsequent stages of RAP preparation, subject to finalization of engineering

designs and confirmation of displacement impacts. It does not constitute an account of activities already completed.

A. Preliminary tasks (deliverable to be validated by KADSTRA and AFD)

1. Clarification of Regulatory Framework: identification of national, regional land acquisition and resettlement legal requirements, permitting procedures and compensation eligibility criteria; identification of international financing requirements; definition of measures to bridge gaps between the above two and state project land acquisition and resettlement strategies)
2. Clarification of Project Impacts: Based on the Detailed Engineering Designs for the corridor (corridor works will be restricted to a section of the BRT corridor and works will be restricted to a section which can be resourced within the AFD-financing). The RAP will be conducted on that 17 km section of the route to be constructed as the first phase under the EPCS project. (As it is uncertain when the design for the full corridor will be implemented resettlement-related activities need to be undertaken at that stage to account for any changes in circumstances in the meantime).
3. The RAP team will conduct desktop reviews and ground-truthing exercises for identification of types of project land use (including restriction of land access), direct and indirect, permanent and temporary; preparation of “impact tables” that detail each category of affected land, assets and persons; documentation of project resettlement avoidance and minimization process and outcomes
4. Preliminary field survey to; map key affected groups and elaborate a proposal to engage with each group; update a proposal for the entitlement matrix in the RPF for the RAP, including main compensation and livelihood restoration measures to be taken
5. Preliminary mapping of RAP implementation stakeholders (institutional, internal, external), including stakeholders for appropriate income restoration and sustainable development initiatives

B. Validation workshop of institutional setup (deliverable to be validated by KADSTRA and AFD)

In coordination with KADSTRA, AFD and all other relevant institutional stakeholders, of a workshop is required (and one session was organized on Wednesday 28th January 2026 alongside other Stakeholder Consultation meetings) to discuss institutional setup and responsibilities for RAP implementation and the proposed entitlement matrix. The envisaged setup for RAP implementation will be reviewed, including for each stakeholder: associated responsibilities, funding sources and needs for capacity building or assistance.

C. Field surveys (databases to be communicated to KADSTRA and AFD):

Identification of project affected people and communities:

1. Carry out a census to enumerate all affected people and register them according to location. Census will include the collection of background socioeconomic data to characterize the affected population;
2. Compile an inventory of lost and affected assets at the household, enterprise, and community level socio-economic surveys and studies of all affected people (including seasonal, migrant, and host communities); and
3. Carry out an analysis of surveys and studies to determine compensation parameters, to design appropriate income restoration and sustainable development initiatives, and to identify baseline monitoring indicators.

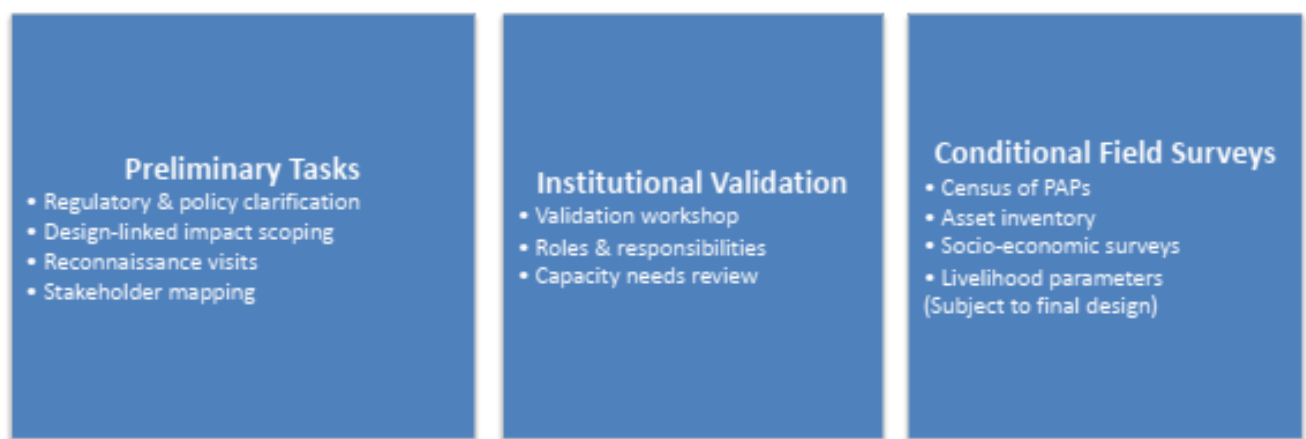


Figure 1.12: Methodological Framework for Resettlement Action Plan (RAP) Preparation

CHAPTER TWO: TECHNICAL APPROACH FOR RAP PREPARATION

2.1. Principles for RAP Preparation

The key principles, based on Good International Industry Practices (GIIPs), that will be applied in the conduct of studies and outputs of this RAP consultancy are

1. Avoidance of displacement impacts and when avoidance is not possible, minimize displacement by exploring alternative project designs.
2. Avoidance of forced eviction.
3. Improve (where possible) or at least restore livelihoods and standards of living of displaced persons.
4. When possible, resettlement plans should be conceived as development opportunities so that those affected may benefit from project activities.
5. Lack of legal rights should not bar displaced persons in peaceful possession from compensation or alternative forms of assistance.
6. Compensation rates refer to amounts to be paid in full to the individual or collective owner of the lost asset, without deduction for any purpose.
7. Replacement house plots, sites for relocating businesses, or if any redistributed agricultural land should be of equivalent use value to the land that was lost.
8. Transition periods should be minimized. Compensation should be paid prior to the time of impact, so that new houses can be constructed, fixed assets can be removed or replaced, and other necessary measures can be undertaken before displacement begins.
9. Displaced persons are consulted during the planning process, so their preferences regarding resettlement arrangements are considered; resettlement plans are disclosed in a publicly accessible manner.
10. The previous level of community infrastructure and services and access to resources will be maintained or improved after resettlement.
11. Resettlement plans include adequate institutional arrangements to ensure effective implementation of resettlement measures.
12. Resettlement plans include arrangements for internal and external monitoring of resettlement implementation.
13. Resettlement plans include procedures by which displaced persons can pursue grievances.

2.2. Main Tasks

The Technical Approach and methodology for the assignment is divided into three (3) phases viz;

1. Preliminary/Pre-field Preparation Stage
2. Field Data Collection Stage, and
3. Data Processing and Report Preparation Stage



Figure 2.1: Summary of Project Execution Stages

Presented above are the methods/approaches that would be used in carrying out the preparation of this RAP report.

2.2.1. Preliminary/Pre-field Preparation Stage

Preliminary activities which will be conducted in preparation for detailed information collection for the assessment of project displacement impacts (physical and economic) are planned as part of the overall deliverable. Seven (7) distinct activities have been identified at this stage. They are depicted in the Table below;

Table 2.1: List of proposed bus stations

Activity #	Name of Activity	Description
Activity A-1	Review of Project Literature and Documents:	Review of background documentation, various project related literature and documents including identifying the possible shortfall/nonadherence to the international standards of Resettlement. Documents to be reviewed will included international standards of resettlement, local laws and regulations.

Activity #	Name of Activity	Description
		i. Project Appraisal Report ii. Designs and Pre-feasibility studies iii. Engineering designs and tender documents for the planned investments; iv. The World Bank ESS 5 v. Resettlement Policy Framework of KBRT (2020) vi. IFC Handbook on RAP preparation vii. World Bank Involuntary Resettlement Sourcebook viii. ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement - Guidance Note For Borrowers ix. Nigeria Land Use Act (1978)
Activity A-2	Meeting with client representatives	The RAP team of the firm held initial meetings with Safeguard and Engineering team of KADSTRA/KBRT PMU. The meetings offered the opportunity to clarify relevant issues regarding client team's considerations on the extent of civil works, scope and terms of reference and to agree on deliverables and timelines. The meetings also discussed opportunities for impact avoidance and minimization measures
Activity A-3	Acquisition and analysis of high-resolution imagery of project area	The RAP team has procured high-resolution satellite images of the project area from the engineering design team. The geo-referenced electronic versions of the preliminary engineering alignment will be superimposed on aerial images to produce draft <u>project impact maps</u> .

Activity #	Name of Activity	Description
Activity A-4	Reconnaissance Mission to Project Impact Locations:	Reconnaissance surveys shall be embarked upon along the proposed routes with a view of identifying the PAPs/communities and familiarizing with the environmental, socio-cultural and economic peculiarities. The RAP team will jointly visit project locations to conduct a ground-truthing of the draft impact maps produced earlier. As part of the reconnaissance visits, the team will also conduct exploratory stakeholder identification for the development of a full Stakeholder Consultation and Disclosure Plan (SCDP).
Activity A-5	Stakeholder Identification and Analysis	Persons affected and/or interested in the project will be identified and their varying degrees of interest and influence over project outcomes will be analyzed.
Activity A-6	Development of Data Collection Tools:	Following the preliminary determination of the type of impacts and the various project locations, data collection instruments will be developed. The instruments will be presented for inputs and validation in the Inception Report to the client. The quantitative tools (PAP Questionnaire and Asset Inventory tool will be provisioned on mobile field data collection application like ODK.
Activity A-7	Development of Eligibility Criteria for RAP Preparation:	The consultant will develop the criteria for eligibility for resettlement benefits under the RAP. General guidance on eligibility is already available in the ESS5. However, the team will contextualize the criteria to fit into what is obtainable in the project environment.
Activity A-8	Development of Entitlement Matrix:	Following the review of legal instruments and policies governing the management of resettlement operations on the project, the RAP team will develop an entitlement matrix which describes the financial and in-kind restorative measures

2.2.2. Field Data Collection Stage

All tasks that are related to field studies, data collection, inventory of impacts and valuation of losses will be carried out at this stage. The activities, as well as a short description of the associated services to be carried out are elaborated in the Table below;

Activity #	Activity	Description
Activity B-1	Conduct Institutional Arrangements Workshop	The RAP team will organize a series of workshops with the PMU, KADSTRA and other KDSG agencies with responsibilities connected with the implementation of resettlement measures built into the RAP.
Activity B-2	Perform an institutional capacity assessment exercise	Using a purpose-specific Institutional Capacity Assessment (ICA) questionnaire, the RAP team will assess the capacity of various mandate agencies identified during the first working session of the Institutional Arrangements Workshop. The assessment will determine the strengths and weaknesses of various agencies to deliver services related to RAP implementation
Activity B-3	Stakeholder/Community Consultation (Stage 1)	Stakeholder/ community consultation will commence with series of meetings with community leaders and influential persons along the BRT corridor. Consultations will be done in several clusters.
Activity B-4	Ground-truthing of actual project impacts	Based on the preliminary alignment drawing prepared by the Engineering Design Team, the RAP team will conduct a joint visit to determine actual impacts and impact categories. Currently, based on reconnaissance visits done by the RAP team, the likely impacts include (i) Relocation of Street Traders and moveable trading assets (ii) Relocation of tenants and occupants of existing motor parks to be developed into bus terminals

Activity #	Activity	Description
		(iii) Potential restriction of access to commercial buildings and consequent impacts on income
Activity B-5	Inventory of affected assets + Census and categorisation of Project Affected Persons (PAPs)	The census is a 100% enumeration of affected assets and persons in the project area. Affected persons will include PAPs with formal title, those with no legal title but with a claim that is recognisable and (iii) those without any form of title or claim. The facial features of each affected asset and person will be captured in the Affected Assets and PAP Database. The data capture will be done with a field data capture application (Q-Field) based on the form placed in Annex 9, and will be provisioned with georeferenced project impact maps developed from preliminary alignment images produced by the Design team. Each Project affected Person (PAP) will be issued an enumeration ticket, as a means of verification of successful enumeration into the PAP register. Follow-up visits will be made to enumerate persons that are not physically available during the census period. Where owners of affected assets are not available during the census period, a Protocol of Actions to include them in the resettlement program will be developed for PMU, KADSTRA and other KDSG agencies to follow after RAP preparation and during implementation process. Census activities are commencing with the offline facilities - terminals and bus depots currently representing the Advanced Works initial phase of civil works on site.
Activity B-6	Socio-economic assessment of PAPs;	All available PAPs will be recruited into a site-specific socioeconomic survey (SES) to characterise socioeconomic attributes of the affected population. A detailed questionnaire (placed in Annex 10) will be provisioned on a mobile application (Open Data Kit, ODK) for electronic

Activity #	Activity	Description
		capture of all required data. Data Management and Analysis will be carried out using Pivot Tables in MS-Excel to determine proportions, while other descriptive measures will be computed using SPSS Version 31
Activity B-7	Declaration of Cut-Off Date	The date of completion of the inventory of affected assets will be announced as the cut-off date. People occupying the project area and assets developed after the cut-off date are not eligible for compensation and/or resettlement assistance. Similarly, fixed assets (such as built structures, crops, fruit trees, and wood-lots) established after the date of completion of the assets inventory, or an alternative mutually agreed on date, will not be compensated. Impacted assets as at the cut-off date will be represented on aerial images and maps of the project area and stored in project database for reference purposes. This will help to mitigate the risk of speculative investments and developments in the project corridor.
Activity B-8	Valuation of Impacted Assets:	The replacement values of all physical structures which will be affected by the proposed works will be determined by a professional assessment to be led by an accredited Estate and Property Valuer. A Cost Approach will be used to calculate the replacement cost. Adjustment for annual changes in the values calculated for each asset will be determined based on inflation and the Composite Price Index (CPI) for building materials and other lost items.
Activity B-9	Market Surveys	The valuation of impacted properties will be complemented by a survey of inputs for the replacement items that will be required.
Activity B-10	Needs Assessment for Livelihood Restoration:	A study to identify the livelihood restoration needs of affected persons around lost income streams, household assets and economic opportunities will be carried out. The

Activity #	Activity	Description
		needs assessment will culminate in the identification of measures that will be required to ensure that affected persons are able to recover from the shocks of economic displacement by replacing lost income streams. Specifically, this assessment will pay specific attention to owners and tenants of affected buildings who may be affected by temporary or permanent restriction of access.
Activity B-11	Assessment of Community Governance and Complaints Management Systems	A qualitative study to determine the available structures for resettlement implementation and complaints management in the Project Affected Communities (PACs).

2.2.3. Data Processing and Report Preparation

Following the successful completion of all field data collection activities, the RAP team will undertake the tasks described in the Table below to wrap-up the deliverables of this consultancy.

Table 2.3: Data Processing and Report Preparation Activities

Activity #	Name of Activity	Description
Activity C-1	Analyses of surveys and studies:	A synthesis and analysis of information collected during the fieldwork phase will be carried out (i) to establish compensation parameters: (ii) to design appropriate income restoration, monitoring, grievance redress mechanism and (iii) sustainable development initiatives.
Activity C-2	Determination of Individual compensation entitlements	Based on market surveys, Asset Valuation Assessments and the specific entitlements captured in the entitlement matrix, specific costing of net value compensation entitlements would be determined, leading to the development of the PAP compensation register.

Activity #	Name of Activity	Description
Activity C-3	Development of Community Development Plans:	The RAP team will also consider feasible options for provision of community assets and services that might facilitate full economic recovery of affected households. This is in keeping in line with the sustainable development consideration of the ESS5 which seeks to leave affected persons better that they were before the commencement of the project.
Activity C-4	Design of Grievance Redress Mechanism:	To ensure social accountability, inclusion, sustainability and transparency in capturing project affected parties, the Consultant shall establish a GRM process as a mechanism to receive and act on complains and grievances by beneficiaries, stakeholders or project affected persons (PAPs) against activities being conducted under this RAP. Grievance mechanisms are increasingly important for development projects where ongoing risks or adverse impacts are anticipated. For the proposed subprojects, grievances are likely to arise due to the following: ○ Complaints on census inclusion ○ Unmanaged expectations;
Activity C-5	Identification and documentation of baseline monitoring indicators	Lack of information about the project: ○ To allow for adaptive management during the implementation of the measures required for managing displacement shocks, a set of monitoring indicators to track progress on the achievement of outputs and outcomes of the Resettlement Action Plan. A causal relationship between

Activity #	Name of Activity	Description
		inputs of the Resettlement Program and expected outputs and outcomes will be developed through a <u>logic modelling</u> process, which will help in identifying indicators that will be measured.
Activity C-6	Development of Implementation Schedules	A schedule for the implementation of the resettlement measures agreed on and documented in the RAP will be developed with inputs from KBRT PMU and the affected persons.
Activity C-7	Development of Budget and Implementation Arrangements	The total cost of the implementation of the RAP will be calculated based on costing of various replacement items done in the earlier stages of the RAP preparation. Secondly, the parties responsible for implementing the resettlement measures, both within KBRT PMU, KADSTRA and other KDSG agencies will be analysed. Areas where capacity development is required to assist in the delivery of the entitlements of affected persons will also be identified and factored into the plan.
Activity C-8	Development and Negotiation of Compensation Agreements with Affected Parties:	Individual compensation entitlements of affected persons will be drafted and negotiated to obtain the consent before it becomes binding on both parties.
Activity C-9	Walk-through of project corridor	The RAP team will facilitate a walk-through of the impacts on the corridor (and other offline locations) to visualise the anticipated impacts with the client team (KADSTRA, PMU and other relevant agencies, especially those identified in the Implementation Arrangements)

Activity #	Name of Activity	Description
Activity C-10	Disclosure of findings of RAP study	Before the finalisation of the Resettlement Action Plan, a draft version of the report, detailing impacts on affected persons, compensatory and restorative measures for the mitigation of impacts and the opportunities for sustainable development (as may be feasible) will be disclosed to the public for comments and observations. KADSTRA/PMU and AFD will also provide comments and observations on the draft report at this stage. Given the fact that engagement with affected persons is a continuous and reiterative process, the disclosure process will be implemented as an opportunity to obtain feedback on the proposed project, and specifically the management of resettlement issues.
Activity C-11	Preparation of Final Report with annexes	Upon the receipt of feedback from affected persons on the contents of the RAP, the consultant will finalize its contents and transmit same to the client for review, clearance and disclosure in line with country laws and regulations.

CHAPTER THREE: FINDINGS FROM PRELIMINARY ACTIVITIES

3.1. Activities Carried Leading to Preliminary RAP Report

As earlier described in section 2.2.1, preliminary activities were planned for implementation within 4 weeks of contract signing. Preliminary activities which have been implemented so far are indicated in the sections below;

3.1.1. Review of Project Literature and Documents

The following project documents were reviewed;

- i. KBRT Resettlement Policy Framework (2020)
- ii. World Bank ESS5 requirements
- iii. Nigerian Land Use Act
- iv. Kaduna State Laws:
 - a. Kaduna State Land Use Regulation (2017)
 - b. Kaduna State Urban Planning & Development Agency (KASUPDA) law

Key findings of this review were presented at the Public Consultation Meeting on RAP preparation and Implementation Arrangements Workshop (Session 1) held on the 27th and 28th January 2026 respectively. These findings are also presented in Chapter Four of this report.

3.1.2. Meeting with client representatives

The RAP team met with client representatives on two occasions namely

1. Briefing on RAP Reconnaissance mission led by RAP consultant and Social Development Specialist on 29th - 30th October 2025. Client team was led by Dr. Yamusa, Project Coordinator of KBRT PMU

2. Briefing on Stakeholder Engagement Meetings held on 27th & 28th January 2026

3.1.3. Acquisition and analysis of imagery of project area

The RAP team acquired Maxar's WorldView-3 recent archive satellite image, EHD (extreme high resolution). The images have been processed to indicate key findings of the reconnaissance mission.

Box 1: Technical Characteristics of project area images

~0.146 meters (14.6 cm) per pixel
8 Short-Wave Infrared bands (3.7m resolution) for advanced material ID
14-bit (capable of capturing up to 16,384 levels of gray)
<3.5m CE90 (Circular Error 90%) without Ground Control Points (GCPs)

Image Projection Characteristics

- Datum: Minna Datum
- Ellipsoid: Clarke 1880 (RGS)
- Projection: Universal Transverse Mercator (UTM)
- Zone: 32 North (32N)
- Spatial Resolution (GSD): 1.5 m × 1.5 m

Coordinate System Parameters

- Projection Type: Transverse Mercator
- Central Meridian: 9° East
- Scale Factor: 0.9996
- False Easting: 500,000 m
- False Northing: 0 m (Northern Hemisphere)
- Units: Meters

3.1.4. Reconnaissance Mission to Project Impact

Locations

Two reconnaissance missions were conducted to understand potential displacement impacts. The reconnaissance visits were not aided by detailed engineering designs. Rather, they were carried out to understand actual site conditions indicated in the feasibility study concept design, identify impact avoidance and minimization measures and provide guidance on reducing displacement impacts to the design team.

1. **Mission 1 (October 30th - October 31st):** Physical corridor observations for expert judgement, identifying hotspots where significant displacement impacts might crystallize.
2. **Mission 2: (January 28th - February 5th, 2026):** A more detailed reconnaissance to capture geospatial data for the representation of impact hotspots identified during Mission 1 on maps to further guide (i) RAP census administration (ii) Engineering Design options and (iii) Overall RAP preparation process.
3. **Mission 3: (May 7th - 8th, 2026):** The RAP team conducted a reconnaissance visit to (i) the Kawo Park at the Northern end of the corridor (ii) the ongoing modern park being constructed at Sobawa on the Kaduna-Zaria highway and (iii) the street roads proposed to serve as the Leventis Bypass system in the busy central market area of the corridor. The purpose of this visits was to understand the site conditions at Kawo as well as the absorptive capacity of the new park at Sobawa to serve as the relocation site.

Key findings from initial consultations with the PMU and field Reconnaissance Visits are summarised below

1. **Strong Institutions within KADSTRA, KBRT PMU and other KDSG Agencies:** Consultations with the PMU revealed that there are adequate institutions and systems within the PMU, KADTSRA and the wider Kaduna State Public service to drive and implement the findings of the RAP study. Within the PMU, there is an experienced Community & Social Development Officer. The PMU is also supported by a Steering Committee and a Technical Working Group which draws membership from KDSG agencies including critical ones relevant to the subject of resettlement - KADGIS and KASUPDA.
2. **Adequacy of Setbacks in significant sections of Kawo-Refinery Junction alignment:** Most sections of the corridor are largely unencumbered, except for
 - a. encroached sections around Kawo (where there is an encroachment by traders from Kawo Market)

b. and Sabo Tasha the road setbacks are largely unencumbered.

3. **Significant constrictions in Leventis to Katsina Road section of Ahmadu Bello Way:** There are significant constraints in this section of the project corridor, along Ahmadu Bello Way, the main commercial street in the city centre and part of the district popularly called “*Kasuwa*” (*Hausa word for market*).⁷ Specifically, there is almost the non-existence of setbacks on the Left-Hand-Side (LHS) in the North-South direction and some space between the road verge and the buildings on the Right-Hand Side of the route. The section is not only narrow, it hosts markets, malls and commercial enterprises hosting considerable trading activity due to the footfall advantage it provides for all businesses in buildings and along the route and because of the various feeder route connections focusing on the area. While the current design largely avoids impacting on building frontages, the presence of significant numbers of street traders in the corridor implies significant economic displacement in this section of the route.

Since the outset of the project, the RAP consultants have suggested alternative design arrangements that can avoid or minimize the impacts on this section of the corridor that have been adopted by the Engineering Design team. Based on the reconnaissance visit findings, the RAP team developed a 3-layer classification system to different the potential displacement impact burden of various locations across the corridor (see Figure 3.1).

4. **Substantial economic activity at Kawo and Sabon Tasha Market:** There are significant economic activities, including encroachments into the road corridor. These economic activities involve clusters of street traders overflowing from nearby markets into the road drainages and pavement structures.
5. **Affected livelihoods and persons at Kawo Park:** The proposed northern terminal site at Kawo comprises two functionally distinct segments with

⁷ Note there are a number of markets in this area but the main Central Market, known as Abubakar Gumi Central Market, lies several street blocks to the east of Ahmadu Bello Way to the east of Lagos Street.

differing land use characteristics and implications for resettlement planning. One segment appears to contain an existing or abandoned government building project, suggesting prior public acquisition; however, this assumption requires formal verification through relevant state institutions, including KADSTRA and KADGIS. The second segment currently operates as an active motor park, hosting a diverse range of transport and commercial activities. These include interstate transport operators, artisans and mechanics operating from informal structures, traders in both formal shops and temporary kiosks, union facilities, and supporting infrastructure such as a public toilet and police post. The coexistence of these varied land uses indicates that, irrespective of formal land ownership status, the site is intensively utilized for livelihood activities.

6. **Site conditions and Issues at Proposed Relocation site for current Kawo Park Users:** The reconnaissance visit to the proposed relocation site at Sobawa indicates that the site is significantly larger than the existing Kawo Motor Park, with preliminary estimates suggesting that Kawo occupies approximately 1.5 hectares, while the Sobawa site extends to about 3.3 hectares. This relative size advantage suggests that Sobawa could potentially accommodate core transport operations currently undertaken at Kawo. However, this assessment remains indicative, as no officially approved site layout or engineering design was available at the time of the visit to confirm space allocation, functional organization, or provision for supporting infrastructure. In addition, initial observations point to potential access and connectivity challenges, which may affect the operational viability of the site if not adequately addressed. A critical issue emerging from the visit is the lack of clarity regarding the scope of relocation, particularly whether the Sobawa site will accommodate only formal transport operators or also include traders, artisans, and other informal users currently active at Kawo. This uncertainty has significant implications for resettlement planning under ESS5, as the exclusion of certain groups could result in economic displacement and livelihood disruption. Addressing these issues will require early clarification from relevant authorities, alongside a comprehensive approach to identifying

affected persons and developing appropriate livelihood restoration and alternative support measures where necessary.



Plate 3.1: Overhead image of Ahmadu Bello Way in the Central Market District (Kasuwa) showing limited setback allowance on Left-Hand-Side of road



Plate 3.2: Street-level view of street trading activities at (i) Kawo and (ii) Ahmadu Bello Way in the Central Market District of the corridor





Plate 3.3: Structures at Kawo Transport Park



Plate 3.4: Proposed relocation site for affected users of Kawo Park (located at Sobawa)



Plate 3.5: Proposed Sobawa Site

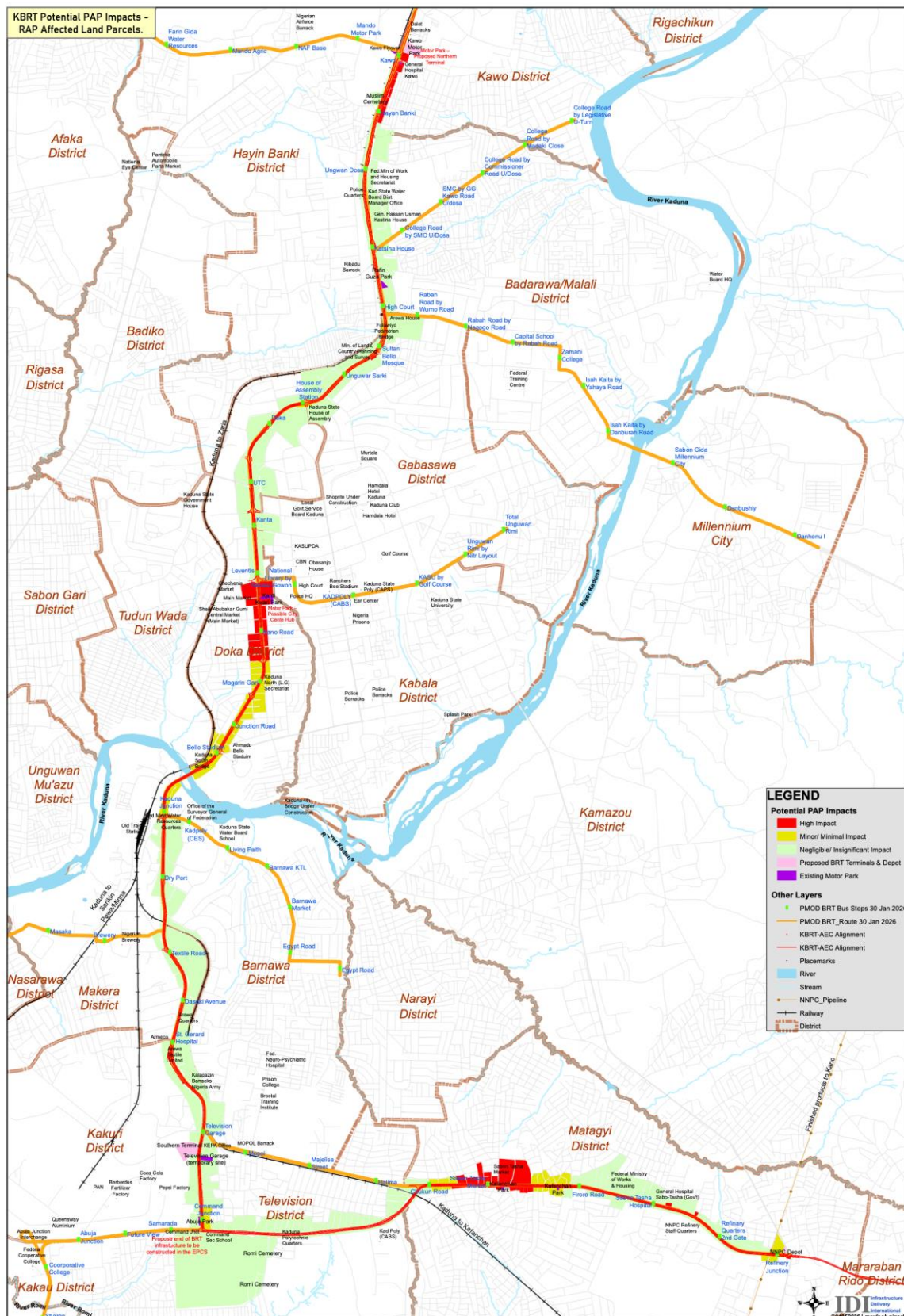


Figure 3.1: Map of the original conceptual project corridor with color-coded representation of potential displacement impacts

The classification of impact zones used in Figure 3.1 above reflects a more nuanced and qualitative, percentage-based displacement impact judgment. The preliminary impact zoning identifies varying levels of displacement risk along the corridor as currently designed. Note that the RAP only applies to the 17 km section of the route from Kawo to Command Junction and the impacts indicated on the rest of the route to the Refinery Junction may change when the construction of that section is scheduled. The potential impacts are indicated as follows:

- **High impact (Red Zone):** Constrained urban sections with dense commercial activity and minimal setbacks (e.g., Leventis-Katsina Road section of Ahmadu Bello Way, Kawo, Sabon Tasha).
- **Moderate or minimal impact (Yellow Zone):** Areas with encroachment by traders but some available setbacks (e.g. Junction Road on the constricted corridor through the city centre).
- **Low/minimal or no impact (Green Zone):** Sections with adequate setbacks and limited encroachment, where displacement is expected to be minimal or avoidable and impacts limited to fences and forecourt area fronting the corridor, possibly encroaching on the statutory right of way.

This mapping of affected areas is based on current sizes of land parcels. Pending the finalization of design process through which feasible impact avoidance and minimization measures will be incorporated to reduce impacts, the expectation is that these parcels will be partially affected, generally avoiding displacement/relocation of building occupants, or completely avoided.

3.1.5 Determination of Potential Displacement Impact

3.1.5.1. *Physical Displacement*

Physical displacement under the KBRT Project is expected to arise mainly from **ROW clearing and demolition of structures** located within road setbacks and areas required for BRT infrastructure. Preliminary reconnaissance indicates that:

- Some **informal and semiformal structures** encroaching on road reserves may require removal, particularly in densely built-up sections of the corridor.
- **Tenants and occupants of existing motor parks** that are proposed to be redeveloped into BRT terminals may require relocation and this is being address by the Government.
- Physical displacement indicated by the current alignment design is expected to be **localized and corridor specific**, with higher risk in constrained urban sections such as Kawo, Ahmadu Bello Way (Kasuwa District) and Sabon Tasha Market areas, where road setbacks are limited or absent.

Consistent with ESS5, avoidance and minimization through design refinement remain a priority, and final displacement magnitude will depend on detailed engineering designs.

3.1.5.2. Economic Displacement

Economic displacement is expected to be **more widespread than physical displacement**, particularly affecting livelihoods dependent on roadside locations and access to pedestrian traffic. Anticipated impacts include:

- **Relocation of street traders and mobile vendors**, including kiosks, stalls, and movable trading assets operating within drains, sidewalks, and road verges.
- **Loss or reduction of income** for traders and small businesses due to temporary or permanent restriction of access to shops and commercial premises during construction.
- **Displacement of informal market activities** clustered around transport nodes and high footfall areas, notably in Kawo, Sabon Tasha⁸ and the Kasuwa/Central City corridor.

⁸ Note that the current proposal for construction of the BRT busway within the EPCS project does not extend as far as Sabon Tasha and this has implications for the scope of the RAP.

- **Restriction of access to commercial buildings**

Reconnaissance findings identify these locations as potential **economic displacement hotspots**, with risks of both temporary and permanent livelihood disruption if not adequately mitigated.

3.1.5.3 Restrictions on Land Use and Access

In addition to outright displacement, the project is expected to impose **restrictions on land use and access** that may affect livelihoods without requiring relocation. These include:

- Temporary loss of access to businesses, residences and community facilities during construction due to traffic diversions, barriers, and work zones.
- Permanent changes in access patterns resulting from dedicated BRT lanes, station fencing, pedestrian crossings and modified junction layouts.
- Reduced access to roadside space traditionally used for informal trading, loading/unloading, and short-term parking.

Such impacts fall within the scope of ESS5 and require compensation and/or livelihood restoration measures where they result in loss of income or means of subsistence.

3.1.5.4 Affected Categories of Project Affected Persons (PAPs)

Based on preliminary assessments, the following categories of PAPs are likely to be affected:

- **Informal traders and vendors** operating within the ROW or road setbacks.
- **Owners and tenants of commercial structures** affected by demolition, partial loss, or access restrictions.
- **Operators and users of existing motor parks** to be converted into BRT terminals.

- **Vulnerable groups**, including women traders, youth, elderly persons, and persons with disabilities, who may be disproportionately affected by livelihood disruption.

3.1.6 Stakeholder Engagement Activities

3.1.6.1 Stakeholder Identification and Analysis

An exercise to identify community gatekeepers and other persons with important stakes in project implementation was carried out between Wednesday 17th and Saturday 20th November, 2025. The identification scheme applied follows the broad stakeholder categorization required by World Bank Environmental & Social Standard (ESS) 10.

Identified stakeholders are shown in Table 3.1 below

Table 3.1: KBRT RAP Stakeholder Identification Table

Identified Stakeholder Category	Identified Stakeholders
Interested parties	
Government stakeholders	Representatives from • KADSTRA • PMU Steering Committee • KBRT PMU • Kaduna State Geographic Information System (KADGIS Office) • Kaduna State Urban Planning & Development Agency (KASUPDA) • Kaduna State Roads Agency (KADRA) • Federal Ministry of Environment • Kaduna State Ministry of Environment • KADGIS • Kaduna State Ministry of Human Services & Social Development

Identified Stakeholder Category	Identified Stakeholders
	• Kaduna State Ministry of Business Innovation & Technology • Kaduna State Road Safety Command
Affected parties	
Local Community stakeholders	Representatives from beneficiary community: • Representatives from 4-LGAs • Emir & District Heads • Community development Officers (CDOs) of communities identified along BRT route • Market association leaders along BRT route • students • Representation from Women, Youths & Elderly persons
Potential Project Affected Persons	Representatives of PAPs: • District Heads • Community development Officers (CDOs) of LGAs covering communities identified along BRT route • Market association leaders along BRT route • Affected shop & business owners
Vulnerable Groups	
Various Types of vulnerable persons	• Elderly persons (above 65 years) • Female Household Heads • Physically challenged persons • Low Income Earners (monthly income below N77,000)

A Stakeholder Engagement Plan (SEP) was prepared to guide all downstream engagement activities that will be required as part of the preparation of the KBRT RAP. The SEP is attached as Annex 1.

3.1.6.2 Stakeholder Engagement Activities

Two kick-off Stakeholder Engagement activities have been held till date. These include;

1. **Public Consultation Meeting on KBRT RAP preparation:** This was held on Tuesday 27th January, 2026. The event brought together diverse stakeholders—including government officials, transport unions, community leaders, and advocacy groups—to discuss the preparation of the Resettlement Action Plan (RAP) for the proposed Bus Rapid Transit (BRT) system in Kaduna Metropolis.

Key objectives included informing stakeholders about the project's scope, potential risks, and the measures to manage environmental and social impacts. Presentations highlighted the BRT's planned route, infrastructure upgrades, and the importance of stakeholder engagement, guided by World Bank standards (ESS10 and ESS5). The RAP aims to ensure fair compensation, minimize displacement, and involve affected communities in planning, with a strong emphasis on transparency and social accountability through a Grievance Redress Mechanism.

Salient issues raised:

- Transport unions expressed concerns about the livelihoods of over 2,000 members (*only one union gave this figure*) potentially affected by the project, seeking engagement in mitigation plans.
- Advocacy groups advised using mass media for information dissemination and emphasized tailored engagement for

vulnerable groups, including market women and persons with disabilities.

- Environmental officials called for robust standards on ventilation, emissions, renewable energy use, drainage, waste management, and occupancy rates for BRT buses, as well as exploring carbon credit opportunities.
- The RAP consultant confirmed that the Resettlement Action Plan (RAP) to be prepared will adhere to international standards for resettlement and compensation, while addressing gaps between Nigerian law and global best practices.
- Timelines for RAP and construction are pending, but resettlement planning will precede any relocation.
- The meeting concluded with commitments to ongoing stakeholder consultations, transparent communication, and inclusive planning to ensure the BRT project delivers modernization while safeguarding community interests.

The meeting report is placed in Annexes 4-6.



Plate 3.6: Mrs. Rakiya Shonekan, ED of WOYAEN making her points during the Q&A session



Plate 3.7: Comr. Hassan Ibrahim - State Secretary, National Union of Road Transport Workers, Kaduna State Council.

- 2. Institutional Arrangements Workshop for Kaduna BRT RAP:** The Institutional Arrangements Workshop (Working Session 1) was convened on January 28, 2026, to support the preparation of the Resettlement Action Plan (RAP) for the Kaduna Bus Rapid Transit (BRT) Project. The session brought together representatives from key Kaduna State agencies and ministries to address legal, policy, and institutional requirements for effective management of resettlement operations on KBRT project.
- 3. Guidance for KBRT RAP Preparation:** Local laws and regulations guiding Resettlement and Compensation for persons affected by government projects was discussed. The workshop also discussed Kaduna BRT Resettlement Policy Framework (RPF) commitments made towards bridging gaps between Nigerian laws and international best practices (WB ESS5 required by AFD) by the following measures
- Compensation at full replacement cost.
 - Inclusive eligibility for ALL affected persons differentiated by existing level of user rights.
 - Support for economically displaced persons through Livelihood restoration programs.
 - Accessible grievance mechanisms.
 - Continuous stakeholder consultation and monitoring.
- 4. Issues and Discussions: Key issues discussed and agreed upon include;**
- Inclusion of Ministry of Justice for legal guidance and grievance redress.
 - Consideration of avoidance measures to minimize compensation impacts.
 - Identification of agencies for statutory compensation and dispute resolution.

- Management of Right-of-Way (ROW) and agency responsibilities.
- Addressing social risks and options for managing demolition scenarios.
- Coordination mechanism through the Resettlement Sub-Committee.

5. Institutional Roles and Coordination

- Agencies represented: KADGIS, KASUPDA, KEPA, MPW&I, KADRA, KADSTRA/KBRT PMU, Ministry of Women Affairs & Social Development, Ministry of Internal Security & Home Affairs, Kaduna Market Management Company, and others. **Key Agency Roles** identified relate to Legal compliance, technical planning, livelihood restoration, social safeguards, community engagement, market management and internal security.
- Proposed Organogram: The **KBRT Steering Committee** will provide policy oversight for all resettlement aspects of KBRT. The **KBRT Technical Committee** will lead general aspects of Technical implementation while a **Resettlement Sub-Committee (RSC)** is being proposed to coordinate roles of various KDSG agencies with secretariat support by KBRT PMU Social Affairs/Community Engagement Unit.

6. Next Steps

- EPCS Consultants to draft letters requesting agency mandates and supporting documents.
- Institutional assessment to be completed, followed by another workshop session for finalization.



Plate 3.8: Presentation on Legal & Policy Framework for KBRT RAP



Plate 3.9: Participant making a point on KBRT RAP Legal & Policy Framework

The meeting report is placed in Annexes 7.

3.1.7 Development of Data Collection Tools

Three (3) tools have been developed based on the preliminary studies carried out so far. The instruments include;

1. Affected Asset (Land and Structure) Inventory Tool (See Annex 8)
2. PAP Census and Socioeconomic data form (Annex 9)
3. Affected Businesses Form (See Annex 10)

The primary tool which will be administered on all PAPs is the PAP Census and Socioeconomic data form (Annex 9). The affected asset form will be used for persons who are losing property or land while the Affected businesses form will be used to capture details of formal or informal businesses that will be affected by the works.

Due to the absence of Detailed Engineering Designs indicating the size and dimensions of the proposed infrastructure items, the draft Project Impact Maps have not been developed. At this stage without specific designs, it would be premature to do the project impact maps as they would be misleading.

3.1.8 Development of Feasible Impact Avoidance & Minimization Measures

Following the application of the mitigation hierarchy as required in ESS1 of the World Bank ESF, the RAP team explored various scenarios on how to avoid or minimize the displacement impacts of proposed works along the corridor.

This section provides a detailed and fully populated assessment of all identified impact avoidance and minimisation measures along the KBRT corridor, reflecting design progress up to 26 March 2026. It includes station-by-station analysis, mapped categorisation of risks, design responses and outstanding issues. Below is a **Station-by-Station categorisation and Detailed Measures**

3.1.8.1. *Leventis Station*

Identified Avoidance/Minimisation Measures:

- a. Offset island station design adopted to minimize land take in restricted corridor.
- a. Alternative access routes proposed by AEC incorporated.

Building impacts have been largely avoided as indicated in preliminary alignment drawings and no demolition required in current alignment.

Outstanding Actions:

- b. Incorporation of pedestrian access improvements.
- c. Review of parking/loading provisions to facilitate access to commercial buildings.

3.1.8.2 *Ahmadu Bello Way*

Identified Avoidance/Minimisation Measures:

- a. Offset/split island concept reduces need for corridor widening.
- b. Night-time servicing required for businesses; shared surfaces proposed but not yet implemented.

Outstanding Actions:

- c. Incorporation of pedestrian access improvements.
- d. Review of parking/loading provisions.

3.1.8.3 Junction Road Station

Identified Avoidance/Minimisation Measures:

- a. Very restricted right-of-way; unavoidable building impacts noted.
- b. Recommended transit mall concept not yet adopted.
- c. Bypass lanes removed to avoid unnecessary land acquisition.

Outstanding Actions:

- a. Incorporation of pedestrian access improvements.
- b. Review of parking/loading provisions.

Detailed impact avoidance measures and status of incorporation are included in Annex 11 of this report.

3.1.9 Review of Eligibility of PAPs

A legal review, precedent to developing the full schedule of eligibility conditions and entitlements has been drafted. It is presented as a standalone chapter of this report and will be updated in subsequent reports following further work on the Institutional Arrangements as shown in the Task Schedule in chapter 2.



Plate 3.10: Early bus station conceptual design

CHAPTER FOUR: STAKEHOLDER CONSULTATION AND DISCLOSURE PLAN

4.1 The Concept of Stakeholder Engagement

Development is mainly about people and its sustainability can only be in relation to their wellbeing. It follows therefore from Freeman's definition of stakeholders above that when lives and livelihoods of people are going to affect and/or be affected, or impact and/or be impacted by functions of governance, their stake-holding is inevitably established. This necessarily applies to people in their groups, communities and organisations. Studies of cities across the world have revealed that the participation of citizens in urban development have been found to enhance both the success and sustainability of projects targeted at such development (Kashi & Ghobadi, 2013).

For Transport Infrastructure projects, stakeholder groups with their programs influence the public in general, especially when social & environmental issues are raised at a risk of winning and losing. Atkin and Skitmore pointed out that meeting the expectations of the stakeholders throughout the project lifecycle will result with successful completion of the process. It has been supported by many researchers that when project stakeholders take part in different stages of Transport Infrastructure projects (e.g. the planning and developmental phases) several benefits can be gained. According to Atkin & Skitmore, it is inevitable to identify & analyze the concerns of stakeholders in Transport Infrastructure Projects such as the KBRT project.

ESS 10 proposes that on all projects, stakeholder engagement should be carried out throughout the lifespan of the project.

As described in Figure 4.1, the success of stakeholder engagement efforts on a project is premised on the proper articulation of the nature, expectations and requirements of the stakeholders on a project. The process of engagement must therefore necessarily be preceded by a conscious effort to identify, analyze and plan for stakeholder engagement. It is also necessary to review engagement efforts and use such learning to map (identify and analyse) stakeholders.



Figure 4.1: Conceptual Cycle for Stakeholder Management on Projects

Stakeholder Mapping is a process and visual tool to clarify and categorize various stakeholders by establishing what the stakeholder groups are, which interests they represent, the amount of power they possess, whether they represent inhibiting or supporting factors for the organization to realize its objectives, or methods in which they should be dealt with. It allows project teams understand who the stakeholders are for the organization. Stakeholder mapping is a collaborative process of analysis, debate and discussion that draws from multiple perspectives to determine appropriate partners.

Mapping can be broken down into four phases:

1. **Identifying:** listing relevant groups, organizations, and people.
2. **Analyzing:** understanding stakeholder perspectives and interests.
3. **Mapping:** visualizing relationships to objectives and other stakeholders.
4. **Prioritizing:** ranking stakeholder relevance and identifying issues.

The findings of the Identification, Analysis and Mapping of KBRT Stakeholders is presented in the succeeding sections

4.2 Stakeholder Identification for KBRT Project

Relevant stakeholders are those individuals, groups of individuals or organizations that affect and/or could be affected by an organization's activities, products, or

services and by the associated performance with regard to the issues addressed by the engagement. An organization may have many stakeholders, each with distinct attributes and often with diverse and conflicting interests and concerns.

Establishing a methodology for systematically identifying stakeholder groups that can contribute to achieving the purpose of the engagement and/or could be affected by its outcome is fundamental to the engagement process. A method for systematically identifying stakeholder groups should consider the scope of the engagement and may be guided by attributes of stakeholders such as the following:

The following criteria adjusted to take account of local specific conditions, are proposed to be used for the identification of stakeholders:

- **Liability:** project implementation or on-going operations may result in legal, financial or other liabilities of the proponent to a social group.
- **Influence:** a social group may be able to substantially influence project implementation or ongoing operations.
- **Partnership:** there are opportunities for building partnership relations between the project developer and a given social group in the framework of the project implementation or ongoing operations;
- **Dependency:** project implementation may significantly affect a given social group, in particular, it may affect vital interests of its representatives if they are dependent on the project on-going operations in economic or financial terms;
- **Representation:** a social group may have a right to represent interests with regard to a project or on-going operations, and this right is legitimated through legislation, custom and and/or cultural specifics;
- **Expressed interest:** a social group and/or individual may express interest to a project or ongoing operations, and this group is not necessarily directly affected by the planned or current activities

A general list of stakeholder groups identified is presented in Table 3.1.

4.3 Stakeholder Categorization Based on ESS 10

For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

- **Affected Parties** - persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
- **Other Interested Parties** - individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and
- **Vulnerable Groups** - persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the projects.

These categorization is based on the requirements of the ESS10 of the World Bank regarding the categories of Stakeholders to be considered in the course of project planning. Table 3.1 also shows the distribution of the stakeholders using ESS10 categorization parameters.

4.4 Consultation Plan for KBRT RAP Preparation

In a bid to develop an effective plan to manage the impacts of physical and economic displacement, it is important to engage in meaningful consultations with all affected persons. This will ensure proper understanding of the planned interventions, the impacts of such interventions on the assets and living conditions of affected persons.

These discussions will help KADSTRA/KBRT PMU to identify acceptable measures to be employed in offsetting unavoidable impacts of the civil works.

As a good practice in Stakeholder Engagement, the consultation program will be continuous throughout the process leading to the development of the RAP. The

engagement program will also set the tone for further engagement which will be done during RAP implementation, consequent upon the finalization of the RAP.

Table 4.1: Consultation Plan, Methods and Tools for RAP Preparation Process

RAP Preparation Phase	Target Group	Consultation Activities	Tools	Responsible Entity	Proposed Date
Community Entry	Community Leadership, Traders Associations	Advocacy and Sensitization Visits to stakeholders	Advocacy Letters	PMU, EPCS Consultant	20 th April, 2026
	Local Authorities	Meeting with LGA and LCDAs along project corridor	PowerPoint Presentations Project concept flyers	PMU, EPCS Consultant	21 st April, 2026
	Community Leadership, Traders Associations	Town Hall Meetings	PowerPoint Presentations Project concept flyers	LGAs/LCDAs, PMU, EPCS Consultant	22 nd April, 2026
Pre-Impact Census	Affected Persons, including business owners	Focus Groups, Community Forum	Project designs	LGAs/LCDAs, PMU, EPCS Consultant	23 rd to 30 th April, 2026
Development and Negotiation of Compensation Entitlements	Affected Persons, including business owners	Focus Groups, Community Forum	Project Impact Maps	LGAs/LCDAs, PMU, EPCS Consultant	7 th - 14 th May, 2026

4.5 Consultation Plan for KBRT RAP Preparation

4.5.1 Benefits of Public Disclosure

Disclosure of relevant project information helps stakeholders understand the risks, impacts and opportunities of the project. The following information will be disclosed to individuals and groups adversely affected by impacts from the project:

1. The purpose nature and scale of the project
2. The duration of proposed project activities
3. Any risks to and potential impacts about environment, worker health and safety, public health and safety and other social impacts on communities, and proposed mitigation plans
4. The Grievance Redress Mechanism

5. The envisaged consultation process and opportunities and ways in which the public can participate
6. Time/venue of any envisaged public meetings, and the process by which meetings are notified, summarized, and reported. This will be supplemented with meetings/workshops for public presentation of the reports.

4.5.2 Methods of Disclosure

- There shall be information disclosure through public exhibition and display of documents and materials. The reports will be available and accessible to the public.
- The Information will be disclosed in the local language(s) and in a manner that is accessible and culturally appropriate, considering any vulnerable people (for example ethnic groups or displaced persons).
- An information desk will be established at the Project (IUFMP) Office where stakeholders can access available information and as well ask any questions or concerns, they may have or lodge complaints/grievances.

4.5.3 Public Disclosure of Draft RAP Report

Project Affected Persons (PAPs), other stakeholders and members of the public are entitled to information about the project. According to Federal Ministry of Environment (FMEnv) regulations and pursuant to the EIA Act of 1992, **in-country disclosure** of final RAP will take place for 21 working days in designated locations. The first day of disclosure is subject to the finalization of the RAP and the approval to disclose by the FMENV.

Following the completion of in-country disclosure procedures, the RAP will also be disclosed on the AFD external website.

Table 4.2: Detailed Disclosure Plan

S/N	Action	Remarks
1	Disclosure in two (2) national newspapers	The PIU will announce the display locations for the 21-day mandatory disclosure period for the RAP as required by the Nigeria EIA public notice and review procedures.
2	Disclosure in one (1) local newspaper	The PIU will announce the display locations for the 21-day mandatory disclosure period for the RAP as required by the Nigeria EIA public notice and review procedures.
3	Disclosure at designated Public Display Centres at project community level	The final RAP will also be displayed for comments and feedback at selected community sites within the project corridor
4	Disclosure at the Kaduna State Ministry of Environment and Water Resources; and Kaduna Bureau of Lands	The PIU will display the RAP report for the 21-day mandatory disclosure period at the Kaduna State Ministry of Environment and Water Resources and Kaduna Bureau of Lands as required by the Nigeria EIA public notice and review procedures
5	Disclosure at KADSTRA office and website	KADSTRA will display the RAP for the 21-day mandatory disclosure period at its office as required by the Nigeria EIA public notice and review procedures.
6	Disclosure at the Local Government Office and the project community	The purpose will be to inform stakeholders about the project activities; environmental and social impacts anticipated and proposed environmental and social mitigation measures. The PIU will display the RAP for the 21-day mandatory disclosure period at their Local Government office as required by the Nigeria EIA public notice and review procedures. Summaries and redacted PAP lists (without sensitive PA information) will also be displayed in the project communities before implementation
7	Disclosure at the AFD External website	The RAP will be disclosed on the AFD website in line with its Information Disclosure policies

CHAPTER FIVE: PROJECT LEGAL AND POLICY CONTEXT

5.1 Land Ownership in Kaduna State and Nigeria

Land ownership in Nigeria is subject to a range of diverse cultural and traditional practices and customs. Land can be classified according to the following broad categories:

- **Community land**, or land commonly referred to as ancestral land, is owned by all the people.
- **Communal land** consists mostly of under-developed forests and is owned by nobody. Those who clear it first claim ownership.
- **Clan or family land** is owned by clans and families, as the name suggests.
- **Institutional land**: land allocated to traditional institutions such as traditional authorities and chiefs.
- **Individual land**: land acquired by an individual, which may be inherited by the immediate family, depending on customary practices or purchased or allocated by the government.

5.2 Local Legal/Institutional Guidelines and Requirements

5.2.1 Constitution of the Federal Republic of Nigeria, 1999 (as amended)

Section 44 of the Constitution of the Federal Republic of Nigeria 1999 (as amended) (“the 1999 Constitution”) provides that no immovable property or any interest in or any right over an immovable property shall be compulsorily acquired for overriding public purpose without prompt payment of compensation.

The right of people to freely acquire, use and dispose of property is the foundation not only of Prosperity but of freedom itself. This right to own and acquire immovable property anywhere in Nigeria is an inalienable right of all Nigerians. In view of the

above, payment of compensation upon public acquisition of land or revocation is a constitutional right.

5.2.2 Land Use Act of 1990 and Resettlement Procedures

The legal framework for land acquisition and resettlement in Nigeria is the Land Use Act (LUA) of 1978, reviewed under Cap 202, 1990. The land use act did not strictly classify land into different categories but it recognizes the right of occupancy for all lands that can be granted by the Governor of a State and the customary right of occupancy that can be granted by Local Government Area Authority.

The following are selected relevant sections of the Act:

Table 5.1: Relevant Sections of LUA to Kaduna BRT Project (KBRT)

Section	Provision of the Section
Section 1	Subject to the provisions of this Act, all land comprised in the territory of each State in the Federation are hereby vested in the Governor of each state and such land shall be held in trust and administered for the use and common benefit of all Nigerians in accordance with the provisions of this Act.
Section 2 (a)	All land in urban areas shall be under the control and management of the Governor of each State; and (d) all other land shall be under the control and management of local government within the area of jurisdiction in which the land is situated.
Section 5 (1)	It shall be lawful for the Governor in respect of land, whether or not in an urban area (a) to grant statutory rights of occupancy to any person for all purposes.
Section 6 (1)	It shall be lawful for a Local Government in respect of land not in an urban area, (a) to grant customary rights of occupancy to any

Section	Provision of the Section
	person or organization for the use of land in the Local Government Area for agricultural, residential and other purposes; (b) to grant customary rights of occupancy to any person or organization for use of land for grazing purposes as may be customary in the Local Government Area concerned.
Section 6 (3)	It shall be lawful for a Local Government to enter upon, use and occupy for public purposes any land within the area of its jurisdiction, and for the purpose, to revoke any customary right of occupancy on any such land.
Section 6 (5)	The holder and the occupier according to their respective interests of any customary right of occupancy revoked under subsection (3) of this section shall be entitled to compensation, for the value at the date of revocation, of their unexhausted improvements.
Section 6 (6)	Where land in respect of which a customary right of occupancy is revoked under this Act was used for agricultural purposes by the holder, the Local Government shall allocate to such holder alternative land for use for the same purpose.
Section 28 (1)	It shall be lawful for the Government to revoke a right of occupancy for overriding public interest.
Section 29 (1)	If a right of occupancy is revoked, the holder and the occupier shall be entitled to compensation for the value at the date of revocation of their unexhausted improvements.
Section 29 (3)	If the holder or occupier entitled to compensation under this section is a community the Governor may direct that any compensation payable to it shall be paid (a) to the community or

Section	Provision of the Section
	(b) to the chief or leader of the community to be disposed of by him for the benefit of the community in accordance with the applicable customary law (c) into some fund specified by the Governor for the purpose for being utilized or applied for the benefit of the community.
Section 29 (4)	Compensation under subsection (1) of this section shall be, (a) the land, for the amount equal to the rent, if any, paid by the occupier during the year in which the right of occupancy was revoked, (b) buildings, installation or improvements thereon, for the amount of the replacement cost of the building, installation or improvement, that is to say, such cost as may be assessed on the basis of the prescribed method of assessment as determined by the appropriate officer less any depreciation, together with interests at the bank rate for delayed payment of compensation and in respect of any improvement in the nature of reclamation works, being such cost thereof as may be sustained by documentary evidence and proof to the satisfaction of the appropriate officer, (c) crops on land apart from any building, installation or improvement thereon, for an amount equal to the value as prescribed and determined by the appropriate officer.
Section 33 (1)	Where a right of occupancy in respect of any developed land on which a residential building had been erected is revoked under this Act, the Governor or the Local Government, as the case may be, may in his or its discretion offer in lieu of compensation payable in accordance with the provisions of this Act, resettlement in any other place or area by way of a reasonable alternative accommodation (if appropriate in the circumstances).

Therefore, according to the Land Use Act, all land in every state of Nigeria is vested in the Governor of each State, and shall be held in trust for the use and common benefit of all people. The administration of land area is divided into **urban land**, which will be directly under the control and management of the Governor of each State; and non-urban land, which will be under the control and management of the Local Government. The act empowers the Governor to designate any portion of land within the state as urban land. The Governor of each State also has the right to grant statutory rights of occupancy to any person for any purposes; and the Local Government will have the right to grant customary rights of occupancy to any person or organization for agricultural, residential and other purposes. For agricultural purposes, no single customary right of occupancy shall exceed 500 hectares.

The Act was enacted for a number of reasons

- i. bitter disputes over land were resulting in loss of lives and properties;
- ii. the management and ownership of land needed to be streamlined and simplified; and
- iii. citizens, irrespective of their social status, need support to realize their aspirations of owning a place where they and their family can lead a secure and peaceful life.

The Act gives the government the right to acquire land by revoking both statutory and customary rights of occupancy for the overriding public interest. In doing so, the Act specifies that the State or Local Government should pay compensation to the current holder or occupier with equal value for *unexhausted improvements* only.

5.2.2. Kaduna State Land Use Regulations (2017)

The Key Provisions on Land Acquisition, Resettlement and Compensation are

1. Legal Basis for Land Acquisition: The Regulations are issued pursuant to the Land Use Act, CAP L5, Laws of the Federation of Nigeria 2004, and operate within that framework. All land in Kaduna State is administered by the Governor, who retains the statutory power to revoke rights of occupancy for overriding public interest, subject to compensation requirements under the Land Use Act.

2. Compulsory Acquisition and Public Purpose: The Regulations expressly recognize compulsory acquisition of land for government purposes. This is addressed under Regulation 22: “Compulsory Acquisition, Compensation and Resettlement”, which establishes the regulatory basis for:

- A. Government acquisition of land for public use, and
- B. Associated obligations relating to compensation and resettlement of affected persons.
- C. While Regulation 22 does not restate detailed procedures, it anchors compulsory acquisition firmly within the Kaduna State land administration system and links it to valuation and compensation mechanisms provided elsewhere in the Regulations and Schedules.

3. Compensation as a Mandatory Component of Acquisition: Compensation is explicitly recognized as a mandatory element of land acquisition under the Regulations. Compensation is included in the “Initial Bill” issued when land is acquired through government processes such as direct allocation or development leases. Compensation payable is not discretionary; it forms part of the statutory financial obligations attached to land acquisition and allocation.

4. Valuation of Expropriated Assets: The Regulations provide a formal valuation framework to support compensation. Land valuation rates are established under the Seventh Schedule (Land Valuation). Building and improvement valuation is addressed under the Ninth Schedule (Building Valuation). These schedules form the legal basis for assessing the value of land and improvements affected by compulsory acquisition. The Regulations do not permit ad hoc valuation; compensation must rely on these standardized valuation schedules.

5. Resettlement Obligations: The Regulations explicitly acknowledge resettlement as a consequence of land acquisition in specific contexts. Where land is declared a Designated Planning Area, existing occupants “may be subject to compensation and resettlement.” This provision recognizes displacement impacts and establishes resettlement as a lawful response where government planning decisions affect

existing land users. While detailed resettlement procedures are not prescribed, the obligation itself is formally recognized.

6. Development-Driven Acquisition and Compensation: Under Development Lease Agreements (Regulation 19), developers may be required to pay compensation to original occupants of land acquired for development purposes. In such cases, KADGIS issues a bill detailing the acquisition and compensation payable, and payment may be required before actual acquisition occurs. This provision clearly links private-sector development to compensation responsibilities where land acquisition displaces prior occupants.

7. Institutional Responsibility: The Kaduna Geographic Information Service (KADGIS) is the central institution responsible for (i) administering land acquisition processes, (ii) preparing valuation and compensation bills, and (iii) Managing land records related to acquired and affected properties.

8. Dispute Resolution and Appeals: Affected persons retain the right to: appeal decisions related to land acquisition, revocation, or compensation under Regulation 26 (Dispute Resolution and Appeal Process). This provides a formal administrative remedy where disputes arise from expropriation or compensation decisions.

5.2.3. Kaduna State Street Begging and Hawking (Prohibition) Law, 2016

The Kaduna State Government enacted the Street Begging and Hawking (Prohibition) Law, 2016 to curb unregulated street activities, enhance public order, and address security concerns linked to street begging and hawking. The law came into effect in May 2016.

Key Provisions of the Law: Street begging is prohibited in all public spaces. Street hawking is likewise prohibited, including the sale of goods and services in unauthorized public areas. Enforcement is carried out through Magistrate Courts and Mobile Courts. Law enforcement can arrest without a warrant and seize goods used in hawking.

Penalties

For Street Begging

- Up to 3 months imprisonment, or
- A fine up to ₦10,000, or
- Both imprisonment and fine. [abovewhispers.com]

For Street Hawking

- Up to 6 months imprisonment, or
- A fine up to ₦20,000, or
- Both imprisonment and fine.

For Aiding or Abetting

- 1-year imprisonment, or
- A fine of ₦50,000, or
- Both penalties. [abovewhispers.com]

Social and Economic Implications: Many hawkers and child beggars rely on street economies for survival; thus, enforcement risks worsening household poverty and exposing children to greater harm. Reports show continued presence of hawkers and minors on the streets despite the law, indicating economic desperation. Immediate enforcement without alternatives may criminalize poverty and deepen social exclusion.

5.3. International Standards

5.3.1. World Bank ESS5 on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

This is the relevant standard of the World Bank's Environmental and Social Framework which addresses land acquisition and resettlement. It became effective in October, 2018 and is applicable to all borrowing on World Bank Projects. Due to its robustness, the AFD also applies it to projects for which borrowing is being requested. The differences between the Land Use Act and the Bank's ESS5 mostly concern rehabilitation measures, which are neither proscribed nor mandated in the Act. A gap analysis has been conducted and presented as part of the KBRT RPF and applied to this RAP.

In line with the foregoing, the World Bank's Environmental and Social Standard 5 (ESS5) has the following objectives

- i. To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives.
- ii. To avoid forced eviction.
- iii. To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by: (a) providing timely compensation for loss of assets at replacement economic impacts from land acquisition or cost and (b) assisting displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.
- iv. To improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure.
- v. To conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable displaced persons to benefit directly from the project, as the nature of the project may warrant.
- vi. To ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected.

5.3.2. Scope of Application of ESS5

This ESS applies to permanent or temporary physical and economic displacement resulting from the following types of land acquisition or restrictions on land use undertaken or imposed in connection with project implementation:

- (a) Land rights or land use rights acquired or restricted through expropriation or other compulsory procedures in accordance with national law;

- (b) Land rights or land use rights acquired or restricted through negotiated settlements with property owners or those with legal rights to the land, if failure to reach settlement would have resulted in expropriation or other compulsory procedures⁹
- (c) Restrictions on land use and access to natural resources that cause a community or groups within a community to lose access to resource usage where they have traditional or customary tenure, or recognizable usage rights . This may include situations where legally designated protected areas, forests, biodiversity areas or buffer zones are established in connection with the project¹⁰
- (d) Relocation of people without formal, traditional, or recognizable usage rights, who are occupying or utilizing land prior to a project-specific cut-off date;
- (e) Displacement of people as a result of project impacts that render their land unusable or inaccessible;
- (f) Restriction on access to land or use of other resources including communal property and natural resources such as marine and aquatic resources, timber and non-timber forest products, fresh water, medicinal plants, hunting and gathering grounds and grazing and cropping areas;
- (g) Land rights or claims to land or resources relinquished by individuals or communities without full payment of compensation; and
- (h) Land acquisition or land use restrictions occurring prior to the project, but which were undertaken or initiated in anticipation of, or in preparation for, the project.

⁹ Notwithstanding the application of this ESS to such situations, the proponent (i.e Borrower) is encouraged to seek negotiated settlements with affected persons in a manner meeting the requirements of this ESS in order to help avoid administrative or judicial delays associated with formal expropriation, and to the extent possible to reduce the impacts on affected persons associated with formal expropriation

¹⁰ In such situations, affected persons frequently do not have formal ownership. This may include freshwater and marine environments. This ESS does not apply to restrictions of access to natural resources under community-based natural resource management projects, i .e . , where the community using the resources collectively decides to restrict access to these resources, provided that an assessment satisfactory to the Bank establishes that the community decision-making process is adequate and reflects voluntary, informed consensus, and that appropriate

5.4. Gap Analysis of Local Laws and ESS5

An analysis of the legal framework for Land Acquisition and Restrictions required under the KBRT project is required and is presented for the purpose of identifying gaps and making a determination of gap-filling measures to be included in Resettlement Action Plans (RAPs) to be prepared when detailed project design information is decided upon.

There are clear differences between the requirements of the World Bank's ESS5 and the legal/policy instruments of Kaduna State and Nigeria. The areas of divergence include eligibility and valuation of compensations. Country legislature stops at compensation for lost assets, whereas the ESS requires measures to ensure that

- i. Displaced people are not worse-off after displacement;
- ii. Threatened livelihoods and coping strategies are strengthened;
- iii. Incomes, ways of life and socio-cultural networks are restored; and
- iv. Consultation and participation protocols allow displaced persons to enjoy greater benefit of voice and choice in the resettlement process etc.

A summary of these and other differences are elaborated in the table below

Table 5.2: Comparison of Nigerian Legislation and World Bank ESS5

Resettlement Aspect	Nigerian Law or Policy	ESS 5 Requirements	Gap filling measures
Nature of Compensation Payments	Compensation does not cover the actual cost of land. Only the cost of all <i>unexhausted developments</i> are covered. Payment for compensating loss of developments is at <i>depreciated market value</i> . <i>Kaduna State regulations require that all compensation MUST</i>	Recommends land-for-land compensation. Other compensation is at replacement cost. Cash compensation can only be adopted where there is an active land market. All transaction costs required to achieve full replacement of lost land must be included. Locational advantages of acquired landholding must	The eligible PAPs will be compensated on replacement cost. Actual Open Market values <u>sufficient to meet replacement cost</u> will be independently determined and paid.

Resettlement Aspect	Nigerian Law or Policy	ESS 5 Requirements	Gap filling measures
	<i>follow a predetermined valuation schedule, avoiding “ad-hoc” valuation procedures.</i>	also be paid as part of the compensation plan.	All costs of keeping the land productive that has been incurred by affected persons will be included in the compensation offer.
Compensation for Land tenants	Entitled to compensation based upon the amount of rights they hold upon land.	Are entitled to some form of compensation based on the exact nature of their loss (e.g. rental or lease fees) irrespective of the legal recognition of their occupancy. Costs of relocating to new premises must be covered.	Those with legal right on the land are fully compensated for all losses while those without any form of rights on the land but affected by the project as of the cut-off date are assisted to relocate all productive assets and salvaged items.
Owners of “Nonpermanent” and “permanent” buildings	Cash compensation based on market-depreciated value.	Entitled to in-kind compensation or cash compensation at full replacement cost including labor and relocation expenses, prior to displacement. Cash compensation can only be adopted where there is an active market.	Entitled to in-kind compensation or cash compensation at full replacement cost including labor and relocation expenses, prior to displacement.
Encroachers and squatters. Illegal structures	No compensations	Entitled to compensation for buildings, structures, installations and improvements and other assistance measures. Trade-offs in terms of actual entitlements are allowed provided it is successfully negotiated with affected persons.	Encroachers will be assisted to acquire new location and settle properly. All losses <i>might</i> not be covered but replacement items will be negotiated with affected persons and documented in the RAP.

Resettlement Aspect	Nigerian Law or Policy	ESS 5 Requirements	Gap filling measures
Consultation	Silent	Insists upon consultation and informed participation of all affected persons throughout resettlement process.	Detailed Consultation Processes will be undertaken during all project phases. Active negotiation of entitlements will be undertaken as part of consultation processes.
Loss of Access/Rights of Way	Silent	Community Assets will be replaced	Provide assistance to offset the loss of such resources to a community
Livelihoods	Silent	Compensation for loss of assets at full replacement cost and other assistance to improve or at least restore standards of living and livelihoods.	Financial support and livelihood improvement strategies will be implemented for all categories of PAPs with impacts on their means of livelihood.
Communal resources	Where land is owned by the community, compensation may be paid to the chief on behalf of the community or into a specially designated fund for the benefit of the community	Where land is collectively owned, the project is to offer land-based compensation where feasible Endeavour to offset the loss of communal resources through support for initiatives that enhance the productivity of the remaining resources, in-kind or cash compensation for loss of access, or provide access to alternative sources of the lost resource.	Where land is collectively owned, the project is to offer land-based compensation where feasible Endeavour to offset the loss of communal resources through support for initiatives that enhance the productivity of the remaining resources, in-kind or cash compensation for loss of access, or provide access to alternative sources of the lost resource.

Resettlement Aspect	Nigerian Law or Policy	ESS 5 Requirements	Gap filling measures
Resettlement assistance	Silent	Affected persons provided with assistance with movement, transition support and to re-establish access to lost resources.	Affected persons provided with assistance with movement, transition support and to re-establish access to lost resources.
Vulnerable groups	Silent	Provide relocation assistance suited to the needs of each group of displaced persons, with particular attention paid to the needs of the poor and the vulnerable.	Provide relocation assistance suited to the needs of each group of displaced persons, with particular attention paid to the needs of the poor and the vulnerable.
Grievance	Land Use Act provides for establishment of a Land Use and Allocation Committee in each state to arbitrate compensation related disputes. Either party may seek judicial redress in the courts.	Requires the elaborate design of multiple orders of grievance redress mechanism, which provides varied access to suit PAPs understanding and comfort for dispute resolution promptly in an impartial and transparent manner	A culturally-sensitive GRM will be instituted for the project
Forced Eviction	Silent	Requires that project proponents MUST not undertake any form of forceful eviction. Recognizes the powers of “eminent domain” of government if and when it is carried out within existing laws.	No forced eviction will be carried out. However, the powers of government to expropriate in line with the LUA and City Masterplan will be observed. Negotiated settlements will be undertaken when conflicts situations arise

ANNEXES

ANNEX 1: KADBRT STAKEHOLDERS ENGAGEMENT PLAN

Identified Stakeholder Category	Type of engagement/focus of engagement	No of Participants	Duration	Proposed Date	Estimates
Government stakeholders (Interested parties) Representatives from: - KADSTRA PMU - PMU Steering Committee - Federal Ministry of Environment - Kaduna State Ministry of Environment - KADGIS - Kaduna State Ministry of Human Services & Social Development - Kaduna State Ministry of Business Innovation & Technology - Kaduna State Road Safety Command	Stakeholder forum - High Level meetings with Government stakeholders with focus on: - Environmental Surveys and key issues. - Resettlement planning (Right of Way - ROW etc.) - GIS data & maps - Social Development issues identified - Key areas of interest - Project design etc.	100 persons	1/2 day	January 26, 2026	- Venue - Lunch/Refreshment - Stakeholder mtg. banners (x3) - Interpreter/Public Address System/microphones/projector - Stationery - Transport Sub Total
Local Community stakeholders (Affected parties)	Engagement forum - Meetings with Community stakeholders with focus on:	70 persons	1/2 day	January 27, 2026	- Venue - Lunch/Refreshment

Identified Stakeholder Category	Type of engagement/focus of engagement	No of Participants	Duration	Proposed Date	Estimates
Representatives from beneficiary community: - Representatives from 4-LGAs - Emir & District Heads - Community development Officers (CDOs) of communities identified along BRT route - Market association leaders along BRT route - students - Representation from Women, Youths & Elderly persons	Environmental/Biophysical issues - Safety issues of BRT project - Social development issues - GRM/Conflict resolution - Resettlement issues - Feedback on community concerns				- Stationery - Interpreter /Public Address System/microphones/projector - Transport Sub Total
Road Users: Representatives of: - Road transport unions - FRSC	Engagement forum - Meetings with Union stakeholders with focus on: Health & Safety Issues - Livelihood - Involuntary Displacement - Feedback from persons	40 persons	1/2 day	January 28, 2026	- Venue - Lunch/Refreshment - Stationery - Interpreter /Public Address System/microphones/projector Distribution of Letters - Transport Sub Total

Identified Stakeholder Category	Type of engagement/focus of engagement	No of Participants	Duration	Proposed Date	Estimates
Potential Project Affected Persons Representatives of PAPs: - District Heads - Community development Officers (CDOs) of communities identified along BRT route - Market association leaders along BRT route - Affected shop & business owners	Engagement forum - Meetings affected persons with focus on: - Involuntary resettlement/relocation - ROW - Eligibility - Feedback from PAPs	100 persons	1/2 day	TBD	- Venue - Lunch/Refreshment - Interpreter /Public Address System/microphones/projector - Stationery - Transport Sub Total

ANNEX 2: LIST OF COMMUNITIES

1. Kawo
2. Hayin banki
3. Unguwar Sarki
4. Unguwar kanawa
5. Abakpa
6. Badikko
7. Doka
8. Magajin gari
9. Kakuri
10. Television
11. Unguwar romi
12. Unguwar Sunday,
13. Sabon tasha
14. Unguwar yalwa

1. Alh Shehu Tijjani Aliyu Sidi Ciroman Zazzau Hakimin Gundumar Makera 0803 705 1943
2. Alh Bala Muhammad Bunun Zazzau Hakimin Gundumar Doka 0803 700 9741
3. Alh Kabir Zubairu Madaucin Arewa Zazzau Hakimin Gundumar Barnawa 0803 702 5794
4. Alh Jibril Magaji Dan Makwayon Zazzau Hakimin Gundumar Kawo 0803 700 9752
5. Alh Shehu Turaki Marafan Dawakin Zazzau Hakimin Gundumar IGabi 0803 255 1415.

ANNEX 3: REVIEW OF RELEVANT LAWS

The 1999 Constitution of the Federal Republic of Nigeria

Property ownership is guaranteed alongside other fundamental human rights like freedom of speech, association, and movement. Specifically, Section 43 confers the right to acquire immovable property by citizens and Section 44 reserves the government's power of eminent domain and prescribes how this power is to be exercised by the government.

Section 44 (1) provides that “no moveable property or any interest in an immovable property shall be taken possession of compulsorily and no right over or interest in any such property shall be acquired compulsorily in any part of Nigeria except in the manner and for the purposes prescribed by a law that, among other things:

- (i) requires the prompt payment of compensation therefore, and
- (ii) gives to any person claiming such compensation a right of access for the determination of his interest in the property and the amount of compensation to a court of law or tribunal or body having jurisdiction in that part of Nigeria.

This implies that non-compliance in respect to the manner (process), purposes recognized by law, and is met with promptitude in the payment of compensation and allowing claimant unfettered access to the property being taken to ascertain claims and /or reserves affected persons to adjudicate on the quantum of the compensation would void an otherwise valid acquisition or resettlement. The basic land tenure law is the Land Use Act Cap L5, LFN 2004 which operationalizes the provisions of Section 44 of the Constitution.

Land Use Act of 1978

The Land Use Act of 1978 is the applicable law regarding ownership, transfer, acquisition, expropriation and all such dealings on Land in Nigeria. The administration of the urban land is vested in the Governor, while land in rural areas is vested in the Local Government Councils. At any rate, all land irrespective of the category belongs to the State while individuals only enjoy a right of occupancy as contained in the certificate of occupancy, or where the grants are “deemed”.

Thus, the Land Use Act is the key legislation that has direct relevance to resettlement and compensation in Nigeria. Relevant Sections of these laws with respect to land ownership and property rights, resettlement and compensation are summarized below;

1. The Governor administers the land for the common good and benefits of all Nigerians. The law makes it lawful for the Governor to grant statutory rights of occupancy for all purposes; grant easements appurtenant to statutory rights of occupancy and to demand rent.
2. The Statutory rights of Occupancy are for a definite time (the limit is 99 years) and may be granted subject to the terms of any contract made between the state Governor and the Holder.
3. Local governments may grant customary rights of occupancy to land in any non-urban area to any person or organization for agricultural, residential, and other purposes, including grazing and other customary purposes ancillary to agricultural use. But the limit of such grant is 500 hectares for agricultural purpose and 5,000 for grazing except with the consent of the Governor. The local Government, under the Act is allowed to enter, use and occupy for public purposes any land within its jurisdiction that does not fall within an area

- compulsorily acquired by the Government of the Federation or of relevant State; or subject to any laws relating to minerals or mineral oils.
4. According to Section 28 where a Right of occupancy is revoked on the grounds either that the land is required by the Local, State or Federal Government for the public good, the holder shall be entitled to compensation as follows:
 - a. Land: An amount equal to the ground rent, if any, paid by the occupier to the government during the year in which the right of occupancy was revoked.
 - b. Structure: An amount equivalent to the value of the structure less any depreciation. Section 29 of the Land Use Act 1978 outlines the compensation provisions for the compulsory acquisition of land by the government. It specifies the criteria for determining the amount of compensation to be paid to landowners whose land has been taken over for public purposes. The section emphasizes the need for fair and adequate compensation, taking into account factors such as the value of the asset, improvements on the land (structures), disturbance costs, and any special value the land may have.
 - c. Crops: An amount equal to the value as prescribed and determined by the appropriate officer
 5. The Act also provided that where the occupier of the land occupies the land rent free, he/she will not be entitled to compensation, in so doing illegal occupancy of land (e.g., occupying land belonging to someone else), will not be entitled to compensation.
 6. The State is required to establish an administrative system for the revocation of the rights of occupancy, and payment of compensation for the affected parties. So, the Land Use Act provides for the establishment of a Land Use and Allocation Committee in each State that determines disputes as to compensation payable for improvements on the land. (Section 2 (2) (c)).
 7. In addition, each State is required to set up a Land Allocation Advisory Committee, to advise the Local Government on matters related to the management of land. The holder or occupier of such revoked land is to be entitled to the value of the unexhausted development as at the date of revocation. (Section 6) (5). Where land subject to customary right of Occupancy and used for agricultural purposes is revoked under the Land Use Act, the local government can allocate alternative land for the same purpose (section 6) (6).
 8. If local government refuses or neglects within a reasonable time to pay compensation to a holder or occupier, the Governor may proceed to effect assessment under section 29 and direct the Local Government to pay the amount of b such compensation to the holder or occupier. (Section 6) (7).
 9. Where a right of occupancy is revoked on the ground either that the land is required by the Local, State or Federal Government for public purpose or for the extraction of building materials, the holder and the occupier shall be entitled to compensation for the value at the date of revocation of their unexhausted improvements. Unexhausted improvement has been defined by the Act as: anything of any quality permanently attached to the land directly resulting from the expenditure of capital or labour by any occupier or any person acting on his behalf, and increasing the productive capacity the utility or the amenity thereof and includes buildings plantations of long-lived crops or trees, fencing walls, roads and irrigation or reclamation works, but does not include the result of ordinary cultivation other than growing produce.
 10. Developed Land is also defined in the under Section 50 (1) as follows: Land where there exists any physical improvement in the nature of road development services, water, electricity, road, building, structure or such improvements that may enhance the value of the land for industrial, agricultural or residential purposes. It follows from the foregoing that compensation is not payable on vacant land on which there exist no physical improvements resulting from the expenditure of capital or labour. The compensation payable is the estimated value of the unexhausted improvements at the date of revocation.

11. Where a right of occupancy is revoked for public purposes within the state of the Federation; or on the ground of requirement of the land for the extraction of building materials, the quantum of compensation shall be as follows:
 - a. In respect of the land, an amount equal to the rent, if any, paid by the occupier during the year in which the right of occupancy was revoked.
 - b. In respect of the building, installation, or improvements therein, for the amount of the replacement cost of the building, installation or improvements to be assessed on the basis of prescribed method of assessment as determined by the appropriate officer (Surveyor General of Gombe State) less any depreciation, together with interest at the bank rate for delayed payment of compensation. With regards to reclamation works, the quantum of compensation is such cost as may be substantiated by documentary evidence and proof to the satisfaction of the appropriate officer.
 - c. In respect of crops on land, the quantum of compensation is an amount equal to the value as prescribed and determined by the appropriate officer.
12. Where the right of occupancy revoked is in respect of a part of a larger portion of land, compensation shall be computed in respect of the whole land for an amount equal in rent, if any, paid by the occupier during the year in which the right of occupancy was revoked less a proportionate amount calculated in relation to the area not affected by the revocation; and any interest payable shall be assessed and computed in the like manner. Where there is any building installation or improvement or crops on the portion revoked, the quantum of compensation shall follow as outlined above and any interest payable shall be computed in like manner.

Kaduna State Land Use Regulations (2017): Key Provisions on Land Acquisition, Resettlement and Compensation

1. Legal Basis for Land Acquisition: The Regulations are issued pursuant to the Land Use Act, CAP L5, Laws of the Federation of Nigeria 2004, and operate within that framework. All land in Kaduna State is administered by the Governor, who retains the statutory power to revoke rights of occupancy for overriding public interest, subject to compensation requirements under the Land Use Act.
2. Compulsory Acquisition and Public Purpose: The Regulations expressly recognize compulsory acquisition of land for government purposes. This is addressed under Regulation 22: “Compulsory Acquisition, Compensation and Resettlement”, which establishes the regulatory basis for:
 - a. Government acquisition of land for public use, and
 - b. Associated obligations relating to compensation and resettlement of affected persons.
 - c. While Regulation 22 does not state detailed procedures, it anchors compulsory acquisition firmly within the Kaduna State land administration system and links it to valuation and compensation mechanisms provided elsewhere in the Regulations and Schedules.
3. Compensation as a Mandatory Component of Acquisition: Compensation is explicitly recognized as a mandatory element of land acquisition under the Regulations. Compensation is included in the “Initial Bill” issued when land is acquired through government processes such as direct allocation or development leases. Compensation payable is not discretionary; it forms part of the statutory financial obligations attached to land acquisition and allocation.
4. Valuation of Expropriated Assets: The Regulations provide a formal valuation framework to support compensation. Land valuation rates are established under the Seventh Schedule (Land Valuation). Building and improvement valuation is addressed under the Ninth Schedule (Building Valuation). These schedules form the legal basis for assessing the value of land and improvements affected by

compulsory acquisition. The Regulations do not permit ad-hoc valuation; compensation must rely on these standardized valuation schedules.

5. **Resettlement Obligations:** The Regulations explicitly acknowledge resettlement as a consequence of land acquisition in specific contexts. Where land is declared a Designated Planning Area, existing occupants “may be subject to compensation and resettlement.” This provision recognizes displacement impacts and establishes resettlement as a lawful response where government planning decisions affect existing land users. While detailed resettlement procedures are not prescribed, the obligation itself is formally recognized.

6. **Development-Driven Acquisition and Compensation:** Under Development Lease Agreements (Regulation 19), developers may be required to pay compensation to original occupants of land acquired for development purposes. In such cases, KADGIS issues a bill detailing the acquisition and compensation payable, and payment may be required before actual acquisition occurs. This provision clearly links private-sector development to compensation responsibilities where land acquisition displaces prior occupants.

7. **Institutional Responsibility:** The Kaduna Geographic Information Service (KADGIS) is the central institution responsible for (i) administering land acquisition processes, (ii) preparing valuation and compensation bills, and (iii) Managing land records related to acquired and affected properties.

8. **Dispute Resolution and Appeals:** Affected persons retain the right to: appeal decisions related to land acquisition, revocation, or compensation under Regulation 26 (Dispute Resolution and Appeal Process). This provides a formal administrative remedy where disputes arise from expropriation or compensation decisions.

ANNEX 4: DUMMY TABLES FOR ASSET INVENTORY AND CENSUS OF PAPS

Table 1: Inventory of Affected Assets (Dummy Template)

Table X.X: Inventory of Affected Assets along the KBRT Corridor

Asset ID	Corridor Section / Chainage	Asset Owner (Name/Code)	Asset Category	Asset Type	Construction Material	Use of Asset	Level of Impact	Affected Quantity	Unit	Eligibility	Remarks
A-001	Section 1 (CH 0+000 - 0+500)	PAP-001	Structure	Kiosk	Wood/Metal	Commercial	Partial	1	No	Eligible	Road widening impact
A-002	Section 1 (CH 0+500 - 1+000)	PAP-002	Structure	Shop	Block	Commercial	Full	1	No	Eligible	Within station footprint
A-003	Section 2 (CH 1+000 - 1+500)	PAP-003	Land	Vacant Land	N/A	Residential	Partial	120	m ²	Eligible	Encroachment on ROW
A-004	Section 3 (Terminal Area)	PAP-004	Structure	Fence	Concrete	Residential	Partial	25	m	Eligible	Access modification
A-005	Section 4 (Depot Area)	PAP-005	Utility	Electric Pole	Concrete	Public Utility	Full	1	No	Eligible	Relocation required

Notes (for report narrative):

- Asset categories and impact types are consistent with RAP requirements for linear transport infrastructure projects.
- Replacement cost will be determined during detailed valuation and approved by relevant authorities.
- Temporary impacts (e.g. access restriction) will be captured in a separate table if required.

Table 2: Summary of Affected Assets by Type (Dummy)

Table X.X: Summary of Affected Assets

Asset Category	Asset Type	Number Affected	Fully Affected	Partially Affected
Structures	Shops	XX	XX	XX
	Kiosks	XX	XX	XX
Land	Residential Plots	XX	XX	XX
	Commercial Plots	XX	XX	XX
Moveable Assets	Kiosks	XX	XX	XX
Fences/Walls	Concrete / Metal	XX	XX	XX
Total		XX	XX	XX

Table 3: Census of Project Affected Persons (PAPs)

Table X.X: Census of PAPs along the KBRT Corridor

PAP ID	Sex	Age	Household Size	Marital Status	Vulnerability Status	Primary Livelihood	Type of Impact	Asset Affected (ID)	Tenure Status	Eligibility Category	Remarks
PAP-001	M	45	6	Married	None	Trader	Partial loss of structure	A-001	Tenant	Eligible	Kiosk operator
PAP-002	F	38	5	Married	Female-headed HH	Shop owner	Full loss of structure	A-002	Owner	Eligible	Station footprint
PAP-003	M	52	8	Married	Elderly	Farmer	Partial land take	A-003	Customary	Eligible	ROW encroachment
PAP-004	F	29	3	Single	None	Tailor	Partial loss of fence	A-004	Owner	Eligible	Access issue
PAP-005	M	41	7	Married	None	Artisan	Utility relocation	A-005	N/A	Eligible	Temporary impact

Table 4: Summary of PAPs by Impact Type (Dummy)

Table X.X: Summary of PAPs

Impact Type	Number of PAPs	Male	Female	Vulnerable PAPs
Demolition of Structure	XX	XX	XX	XX
	XX	XX	XX	XX
	XX	XX	XX	XX
Livelihood disruption	XX	XX	XX	XX
Total	XX	XX	XX	XX

ANNEX 5: REPORT OF PUBLIC CONSULTATION

MEETING ON RAP PREPARATION

Title of meeting	Public Consultation Meeting on RAP Preparation for the Proposed Construction of Bus Rapid Transit (BRT) in Kaduna Metropolis, Kaduna State.
Language of communication	English and Hausa.
Stakeholders (Full list of attendees attached as Appendix)	• Comr. Hassan Ibrahim - NURTW/ State Secretary • Caleb Solomon Guranga - MENR (Director of Environment) • Musa Bakili • James Tijani - Mai Ungwa • Abubakar Ibrahim - KEPA • Musa Sani Ali - FRSC Representative • Aliyu Bala - Matanalle • Abdullahi Aliyu Sulaiman - ACOMORAN/KASTAF • Rakiya U. Shonekan - Executive Director of the Women and Youth Awareness Empowerment Network (WOYAEN). • Engr. Ishaya Yohanna - KADRA • Engr. Paul Manu - KADRA • Engr Paul Kagoro - MPW&I • Aminu Mohamed Rabiu - Chair Kano Road • Abdulkarim Ismail - Discipline Master • Mustapha Musa • Patima Aboi Sansa - TOAN Treasurer • Paul Samuel Dogo - TOAN Chairman • Abdulrahman Kabiru - District Head Barnawa • Bashiru M. Suleiman - KASUPDA • Engr. Moh'd Sani Khayatudeen - KAPSCO/Head Off-Grid • CRC Tahir Ibrahim - FRSC Kaduna • Fadilat Ibrahim Yusuf - Student • Alh Shuaibu Hamza - RTEAN • Sulaiman Bello - RTEAN • Daniel Abdu Maigari - Central Union Sheikh Gumi
Preliminaries	Registration took place from 10:00am to 11:15am due to unanticipated delays in commencement. The meeting started at 11:15am with prayers said by individuals based on their personal faiths and beliefs. A round of self-introduction was done by all participants and organizers.
Welcome Address by DG, KADSTRA, Engr. Inuwa Ibrahim	The Representative of the Director General of KADSTRA, Engr. Dr. Aliyu Usman welcomed stakeholders to the Public Consultation Meeting. He stated that the BRT project is central to the modernization of Kaduna State. The BRT system is beyond additional lane, rather it is connecting people to opportunities, reducing traffic congestion and lowering the carbon footprint through the modernization of the

Title of meeting	Public Consultation Meeting on RAP Preparation for the Proposed Construction of Bus Rapid Transit (BRT) in Kaduna Metropolis, Kaduna State.
	transportation infrastructure. He mentioned that true progress cannot be achieved at the people and society in general, thus the Kaduna State Government is cautious of the impact of the project activities on people on the project corridor, which necessitated the preparation of RAP for the project. Finally, he thanked the State Governor, His Excellency Senator Uba Sani (CON), the Consultants and the project team, and wished the stakeholders an insightful and productive session.
Presentation of Meeting Objectives by EPCS RAP Consultant, Mr. Tosin Oso	Participants were taken through a short presentation of the need for the meeting which was designed to ensure that stakeholders—including government officials, community members, and affected persons—are well-informed about the project’s scope, risks, and the measures being taken to manage environmental and social impacts. Specific objectives discussed are: • To provide an overview of the planned KBRT project to stakeholders. • To describe some risks and impacts that might be associated with the KBRT project. • To familiarize stakeholders with essential components of resettlement planning applicable to KBRT. • To discuss the Stakeholder Engagement Approach of the Environmental & Social Studies being carried out for KBRT. • To explain KBRT objectives, financing by AFD, and why stakeholder input is critical.
	An overview of KBRT was provided by M&E Specialist of KBRT Project Management Unit, Jibril Abdullahi. He stated the details of the proposed project including the BRT route running from Rigachikun to Mararaban-Rido, the spurs proposed towards Mando, Kasuwa, Rigasa, Kakuri and Gonin-Gora. Key project activities include the following among others: i. Construction of 22-km bus corridor; ii. Construction of 46 Bus stations; iii. Road corridor expansion; iv. Construction of Bus terminals, Bus depots & Bus stops; v. Relocation of utilities such as water lines, telecommunication & electricity cables & underground drainages/man-holes; vi. Construction of road furniture; vii. Underground fuel dump/storage area viii. Road marking

Title of meeting	Public Consultation Meeting on RAP Preparation for the Proposed Construction of Bus Rapid Transit (BRT) in Kaduna Metropolis, Kaduna State.
	ix. Street lightings x. Modern High-Capacity Buses xi. Intelligent Transport System xii. Project Management and Operations Design Support The Communication Officer, Musa Luka also added the point that the KSTS buses are not BRT buses.
Presentation of KBRT Project Stakeholder engagement approach by EPCS Social Development Consultant, Dr. Eyitope Ajayi	The presentation demonstrated how the Kaduna Bus Rapid Transit (KADBRT) Project emphasizes the critical role of stakeholder engagement throughout its lifecycle. Stakeholder engagement, defined as an inclusive, ongoing process of interacting with individuals or groups who are affected by or can influence the project, especially those with decision-making power. The main objectives are to systematically identify stakeholders, build and maintain constructive relationships, assess stakeholder interest and support, and ensure that their views inform project design and environmental and social performance. The process also aims to provide timely, accessible, and understandable information about project risks and impacts. Based on World Bank ESS10, stakeholders under KBRT will be (and are being) categorized as (i) project-affected parties (PAPs) and (ii) other interested parties. Effective engagement requires early and continuous identification and consultation with stakeholders, ensuring that interactions are culturally appropriate, free from manipulation or intimidation, and proportionate to the project's risks and impacts. Meaningful consultation is a two-way process that begins early, encourages feedback, and adapts as project risks and opportunities evolve. It relies on transparent information sharing and responsiveness to stakeholder input. The engagement process for KBRT will also include stakeholder identification and analysis, planning engagement activities, information disclosure, consultation, grievance redress, and feedback reporting. A Grievance Redress Mechanism (GRM) is established to ensure social accountability, inclusion, and transparency, providing a channel for stakeholders and affected persons to express concerns and seek remedies. The GRM will reduce project risks, foster constructive relationships, and support positive social change by addressing grievances related to delays, conflicts, unmet expectations, or lack of information.
Presentation of Resettlement Planning principles and approach under KBRT project by EPCS RAP Consultant, Mr. Tosin Oso	The session introduced stakeholders to the project's scope, emphasizing the need to manage environmental and social risks. The EPCS RAP consultant noted that while development projects like KBRT drive economic growth, they can also harm the environment and exacerbate social inequities if not properly managed. The presentation stressed the importance of robust safeguards to prevent environmental damage, protect marginalized groups, and promote sustainable development. Resettlement and Displacement: A significant focus was on the risks associated with land acquisition and involuntary resettlement. KBRT activities may cause physical and economic displacement,

Title of meeting	Public Consultation Meeting on RAP Preparation for the Proposed Construction of Bus Rapid Transit (BRT) in Kaduna Metropolis, Kaduna State.	
	leading to risks such as landlessness, joblessness, homelessness, marginalization, and community disarticulation. International best practices, including the World Bank’s Environmental and Social Standard 5 (ESS5), guide the mitigation of these risks. The Resettlement Action Plan (RAP) is a critical tool, ensuring compensation, relocation, and rehabilitation of affected persons according to international standards. Risk Management and Legal Context: The presentation compared Nigerian land laws with international standards, noting gaps in areas such as compensation, consultation, and support for vulnerable groups. The funding agency, AFD, requires adherence to ESS5, which recognizes three categories of eligible persons for compensation and assistance, including those without formal land rights. Implementation and Next Steps: The RAP process involves stakeholder consultations, asset inventories, socio-economic assessments, and the development of an entitlement matrix. A Grievance Redress Mechanism (GRM) will be established to address complaints transparently and locally. Next steps include further consultations, data collection, and communication of the cut-off date for eligibility. All these processes would be implemented as soon as designs are substantially developed. Conclusion: The KBRT Project’s approach prioritizes minimizing displacement, ensuring fair compensation, and involving affected communities in planning. The adoption of international standards and a structured RAP aims to balance development goals with social responsibility and risk mitigation.	
Questions, Concerns and Issues raised by participants and responses provided: This session was moderated by Dr. Ja’afar Abdulkadir, KBRT PMU Specialist on Stakeholder & Community Engagement. Answers to questions were provided by EPCS RAP consultant, Mr. Tosin Oso		
Speaker	Issue/Concern Raised	Response Made/Action Decided
Comr. Hassan Ibrahim - State Secretary , National Union of Road Transport Workers, Kaduna State Council.	The State Secretary spoke on behalf of members of the union. He stated that the union has about 2,000 members on the proposed BRT corridor who will be directly affected the proposed works. He stated that the union was looking forward to being engaged in plans to reduce and offset impacts on the livelihoods of operators on the affected corridor.	The enthusiastic response of the union to discuss the issues further was noted.
Comrade Paul Dogu, State Chairman, Tricycle Operators Association of Nigeria (TOAN)	He wanted to know if the KBRT RAP would apply international standards.	Yes. World Bank Environmental & Social Framework (ESF) would be applied to management of environmental and social risks, including physical and economic displacement

Title of meeting	Public Consultation Meeting on RAP Preparation for the Proposed Construction of Bus Rapid Transit (BRT) in Kaduna Metropolis, Kaduna State.	
Rakiya U. Shonekan - Executive Director of the Women and Youth Awareness Empowerment Network (WOYAEN).	1. Advised on the use of media (local, conventional and digital) to disseminate information to affected persons	1. Use of mass media will be adopted for critical activities such as announcement of public disclosure of key documents
	2. She also advised that the engagement of affected market women groups whose street trading/hawking activities will be affected is best done in individual clusters rather than large groups.	2. Yes. The small cluster approach will be adopted when affected persons are identified. They have not been identified at this stage as the engineering designs are still being worked on
	3. How do we identify affected market traders as they may not have a formal organizational structure with proper leadership	3. Any exiting informal structure will be investigated and worked with. Influential persons within the market ecosystem will also be involved at the appropriate time.
	4. Persons with disabilities and other persons with special needs who might be affected will need to be engaged with	4. In line with ESS10, special attention will be given to vulnerable persons during engagement, socioeconomic assessments and mitigation design
	5. What are the timelines for RAP and construction works	5. Specific timelines are not yet known and will become clearer as the design work progresses. However, best practice is that all resettlement and planning work must be completed before people are made to relocate to accommodate construction work.
	6. Besides physical displacement, which other type of displacement was covered in the presentation made by the RAP consultant?	Besides physical displacement, there are economic forms of displacement.
Musa Sani Ali - FRSC Representative	He used the opportunity to sensitize participants on the role of FRSC in BRT operations - managing obstructions during construction and operations, responding to accidents and crashes etc	The points were noted for both public use and for incorporation into the ESIA

Title of meeting	Public Consultation Meeting on RAP Preparation for the Proposed Construction of Bus Rapid Transit (BRT) in Kaduna Metropolis, Kaduna State.	
Caleb Solomon Guranga - Director of Environment, Ministry of Environment & Natural Resources	1. Ventilation standards should be adopted for BRT buses to provide opportunity for air movement when onboard airconditioning (AC) systems fail 2. Emission levels of BRT buses 3. Renewable energy options for BRT buses 4. Reasonably-sized drainages to accompany the new road construction 5. Construction waste management should be factored 6. Maximum occupancy rates for BRT buses should be strictly adhered to, to prevent transmission of diseases 7. Explore options for greening as part of construction works 8. Explore carbon credit opportunities	The points were acknowledged and they would be considered in the assessment of impacts being done in the ESIA workstream
Closing Remark	Dr. Ja'afar Abdulkadir, KBRT PMU Specialist on Stakeholder & Community Engagement, appreciated all participants and invited 1. Stakeholders representing government Ministries, Departments and Agencies (MDAs) for another focused session on Institutional Arrangements on Wednesday 28th January by 11.00am 2. Stakeholders representing Transport Unions for a session on impacts on road users on Wednesday 28th January by 1.30pm On a general note, there will be more focused consultations before and during the preparation of the RAP. The meeting came to a close at 1:30pm with group photographs	

ANNEX 6: PICTURE GALLERY ON PUBLIC CONSULTATION MEETING

	
Mrs. Rakiya Shonekan, ED of WOYAEN making her points during the Q&A session	Representative of FRSC, Kaduna State Sector Command making some points during the Q&A session
	
Comr. Hassan Ibrahim - State Secretary, National Union of Road Transport Workers, Kaduna State Council.	EPCS Consortium RAP consultant, Mr. Tosin Oso delivering a presentation on best practices in management of resettlement and displacement during the meeting



Comrade Paul Dogu Chairman, Tricycle Operators Association of Nigeria (TOAN) asking a question during the meeting



Group Photograph taken at the event

ANNEX 7: ATTENDANCE RECORDS FOR RAP

PREPARATION PUBLIC CONSULTATION MEETING

SN	Name	Organization & Designation	Phone/Email
1	Comr. Hassan Ibrahim	NURTW/ State Secretary	08036571954
2	Jibril Abdullahi	KADSTRA/M&E Officer	08065480704
3	Dr. Aliyu Usman	KADSTRA/PMU PC	08038861172
4	Habibu Mohammed Lawal	KADSTRA Project Assistant	08032970808
5	Michael Medubi	KADSTRA Security Specialist	08069179995
6	Caleb Solomon Guranga	MENR (Director of Environment)	07063202200
7	Muhammad Bello Ismaila	KADSTRA Env. Specialist	08035301644
8	Barr. Sani Shehu Idris	KADSTRA/Legal Specialist	08068786311
9	Musa Bakili		08016548885
10	James Tijani	Mai Ungwa	08035371391
11	Abubakar Ibrahim	KEPA	07036769010
12	Musa Sani Ali	FRSC	08169757578
13	Aliyu Bala	Matanalle	08026579633
14	Abdullahi Aliyu Sulaiman	ACOMORAN/KASTAF	08033276658
15	Hauwa Yusuf Ramalan	KADSTRA	09063695275
16	Fatima Nasir Ladan	KADSTRA	08039218391
17	Umar Rahinat Hassan	KADSTRA	08038961969
18	Mustapha Yusuf	KADSTRA	08063234959
19	Nana Abdu Na Abdu	KADSTRA	08032690901
20	Yamusa Shafiu	KADSTRA	08065178708
21	Rakiya U. Shonekan	WOYAEN	08037001619
22	Asmau Shurailu Mahid	KADSTRA	08066636122
23	Dr. Jaafar Abdulkadir	PMU, KBRT	08062262076
24	Dr. Eyitope Ajayi	AEC/IDI	08138807454
25	Engr Musa Moh'd Sani	KADSTRA/PMU	07032200355
26	Engr. Ishaya Yohanna	KADRA	08031833949
27	Engr. Paul Manu	KADRA	07086231154
28	Engr Paul Kagoro	MPW&I	08028434313
29	Aminu Mohamed Rabiu	Chair Kano Road	08060434998
30	Abdulkarim Ismail	Discipline Master	07060916173
31	Mustapha Musa		08088436416
32	Patima Aboi Sansa	TOAN Treasurer	09035672568
33	Paul Samuel Dogo	TOAN Chairman	07064898500
34	Abdulkareem Lawal	HTS KADSTRA	08063601448
35	Yusuf Abubakar Kusfa	KADSTRA	08032613129
36	Isah Abdullahi	KADSTRA	08033499851
37	Abdulrahman Kabiru	District Head Barnawa	08038242770
38	Bashiru M. Suleiman	KASUPDA	08029151284

SN	Name	Organization & Designation	Phone/Email
39	Monye Peter C.	AEC	08134281296
40	Godsfavour Fadipe A.	AEC	07019358100
41	Engr. Moh'd Sani Khayatudeen	KAPSCO/Head Off-Grid	07068103191
42	CRC Tahir Ibrahim	FRSC Kaduna	08081490062
43	Abdullahi Ahmad Yahaya	KBRT	08148333218
44	Fadilat Ibrahim Yusuf	Student	09165387962
45	Alh Shuaibu Hamza	RTEAN	07083502020
46	Sulaiman Bello	RTEAN	08036072483
47	Engr Abdulrahaman Musa	KBRT	08069513764
48	Daniel Abdu Maigari	Central Union Sheikh Gumi	08038881935



**RESETTLEMENT ACTION PLAN (RAP) STAKEHOLDER
ENGAGEMENT FOR THE PROPOSED BUS RAPID TRANSIT (BRT) PROJECT FOR KADUNA
METROPOLIS HELD AT SYDE RESORT, MALALI, KADUNA ON 27TH JANUARY 2026
ATTENDANCE LIST**

S/NO.	NAME	ORGANISATION DESIGNATION &	PHONE & EMAIL	SIGNATURE
1.	Comr. HASSAN IBRAHIM	NURTW, S/SEC	06036571954. Comr	
2.	Dr. Aliyu Usman	KADSTRA/MOE	08065480704/ drbrifaladun@gmail.com	
3.	Musa Luka.	KADSTRA/PC	08038861172 aliyusmanna@gmail.com	
4.	Heibu Mohammeds Lawan	KADSTRA/INAC	08035532867 muelakablon.kd.gov.ng	
5.	Michael Mbozi	✓ Reg. Asst.	08032970808 habibumohibrt.kd.gov.ng	
6.	Caleb Solomon Gurruya	✓ Security Spec	08069179995 Michaelmbozi@gmail.com	
7.	Muhammad Bello Samaila	MENR	07063202200 cartergurruya@gmail.com	
8.	BARR SANI SHEHU ISAS	KADSTRA/ES	08035301644 muelakablon.kd.gov.ng	
9.	MUSA BARKU	KADSTRA/LEGAL SPEC	08065786311 shehusanidise@gmail.com	
10.	JAMES TIJSALI	MAI UNPWC	08016548885	
11.	Abubakar Ibrahim	KEPA	08035371391	
12.	MUSA SANI API	FRSC	08036769010 abudibngzo@gmail.com	
13.	ALI IN BALA	NATIANALC	08169757578	
14.	HEBU MOHAMMEDS LAWAN	ALOMVON/KADSTRA	08026527633	
15.			08033276658	

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**RESETTLEMENT ACTION PLAN (RAP) STAKEHOLDER
ENGAGEMENT FOR THE PROPOSED BUS RAPID TRANSIT (BRT) PROJECT FOR KADUNA
METROPOLIS HELD AT SYDE RESORT, MALALI, KADUNA ON 27TH JANUARY 2026
ATTENDANCE LIST**

S/NO.	NAME	ORGANISATION DESIGNATION &	PHONE & EMAIL	SIGNATURE
1.	Hauwa Yusuf Kamalan	KADSTRA	09065795275 Hauwayusuf@gmail.com	
2.	Fatima Nasir Ladan	KADSTRA	08039018391 fatimanasiradan@gmail.com	
3.	Umar Rahmat Hassan	KADSTRA	08038761969 rahmatussan@gmail.com	
4.	MuSlopha Yusuf	KADSTRA	08063234259	
5.	Mama Abdul na Abdul	KADSTRA	08032690901	
6.	Yamusa SHAFIU	KADSTRA	08065198708	
7.	Rakya U. Shonekan	NOTAGN	08037001619	
8.	Asmanu Shuaibu Mithal	KADSTRA	08066636122	
9.	Dr. Jaafar Abdulkadir	PMU, KRT	08062262076	
10.	Dr. FUTOPE AJAYI	AEC/IDI	0818807454	
11.	Engr. Musa Mub'd Sami	KADSTRA/PMU	07032200355	
12.	Engr. Ishaya Tahauna	KADSTRA	08031833949	
13.	Engr. Paul Monu	KADSTRA	07086231154	
14.	Engr. Ibrahim Sulaiman Magaji	MPWP	08039335884	
15.	Engr. Paul Kagoro	MPW&S	08028434313	

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**RESETTLEMENT ACTION PLAN (RAP) STAKEHOLDER
ENGAGEMENT FOR THE PROPOSED BUS RAPID TRANSIT (BRT) PROJECT FOR KADUNA
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ATTENDANCE LIST**

S/NO.	NAME	ORGANISATION DESIGNATION &	PHONE & EMAIL	SIGNATURE
1.	Amidu Murtana RASIN	CLTIN KADUNA	080 60 434598	
2.	ABDULKARIM ISMAIL ISAE	Discipline master	07060916172	
3.	Mariam Musa edua		090 88 43 64 11	
4.	Patience Abasi Sami	Team Treasurer	070 35622563	
5.	PAUL SAMUEL - DOGO	TEAM CHAIRMAN	07064898500	
6.	Abdulkareem Lawal	HIS KADUNA	0806360448	
7.	Musuf Abubakar Knefa	KADUNA	08032613129	
8.	Isah Abdullahi	KADUNA	08033499851	
9.	Abdulrahman Kabisu	District Head Bourne	08038242770	
10.	Bashir M. Suleiman	KASUDA	08029151281	
11.	Monye Peter C	AEC	08034281296	
12.	Godwin Edeje A.	AEC	07019358100	
13.	Engr. Mohd Sani Khayatudeen	KAPSCO / HHS OFF GRP	07068103191	
14.	CPC Tania Segun	AEC KADUNA	08081490062	
15.	Abdullahi Ahmad Yakari	KBRIT	08048333212	

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**RESETTLEMENT ACTION PLAN (RAP) STAKEHOLDER
ENGAGEMENT FOR THE PROPOSED BUS RAPID TRANSIT (BRT) PROJECT FOR KADUNA
METROPOLIS HELD AT SYDE RESORT, MALALI, KADUNA ON 27TH JANUARY 2026
ATTENDANCE LIST**

S/NO.	NAME	ORGANISATION DESIGNATION &	PHONE & EMAIL	SIGNATURE
1.	Fatimat Ibrahim Yusuf	Student	09105387962	
2.	Alh, Shehu Hamza	RTAN	070 83 502020	
3.	Sulaiman Bello	RTAN	08036072483	
4.	Engr. Abdulrahman Musa	KBRIT	08069513764	
5.	Daniel Abdu MALGARI	CENTRAL UNION STREET GROUP	08038861935	
6.				
7.				
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ANNEX 8: REPORT OF INSTITUTIONAL ARRANGEMENTS WORKSHOP (SESSION 1)

1.0 Session Objectives

1. To identify and interrogate all laws, policies and regulations (state, national, and international) that are relevant to the management of resettlement aspects of the KBRT project.
2. To identify specific agencies and institutions responsible for various aspects of resettlement implementation
3. To develop a coordination mechanism for the implementation of the Resettlement measures identified in the RAP document to be prepared by EPCS consultant.

2.0 Participants

Various agencies were represented at the session. Agencies represented include KADGIS, KASUPDA, KEPA, MPW&I, KADRA and KADSTRA/KBRT PMU.

1. Jamila Hamisu - AI/Rebel
2. Yusuf Danjuma Aliyu - KASUPDA
3. Bashir M. Suleiman - KASUPDA
4. Mr. Solomon - KADGIS
5. Abubakar Ibrahim - KEPA
6. Engr. Ishaya Yohanna - KADRA
7. Engr Paul Kagoro - MPW&I
8. Engr Ibrahim Suleiman Magaji - MPW&I
9. Abubakar Ibrahim - DAF
10. Engr Paul Manu - KADRA
11. Michael Medubi - Security Specialist
12. Muhammed Hayatudeen - Ministry of Women Affairs & Social Development
13. Dr Jaafar Abdulkadir - PMU KBRT
14. Musa Luka - KADSTRA/PMU M&E
15. Mohammad Bello Samaila - KADSTRA
16. Engr Musa Mohammed Sani - KADSTRA
17. Engr Aliyu M. Tukur - PMU KBRT
18. Jibril Abdullahi - M&E Officer KBRT

3.0 Technical Presentation

The RAP consultant of the EPCS consortium, Mr. Tosin Oso led a presentation on the key legal and policy considerations underpinning preparation of the KBRT RAP. The presentation noted that the Kaduna Bus Rapid Transit (BRT) project requires land acquisition and may involve the resettlement of affected persons. The preparation of the RAP must be guided by both Nigerian legal frameworks and international standards, particularly the World Bank's Environmental and Social Standard 5 (ESS5), which is also recognized by the French Development Agency.

3.1 Key Legal and Policy Considerations:

- Nigerian Law: The Constitution (1999) and Land Use Act (1978) prohibit compulsory land acquisition without compensation, but compensation is typically limited to the depreciated value of unexhausted improvements. Local planning laws require compliance with the Kaduna Masterplan, with compensation guided by the Land Use Act.

- International Standards (ESS5): ESS5 mandates avoidance or minimization of involuntary resettlement, compensation at full replacement cost, restoration or improvement of livelihoods, special attention to vulnerable groups, meaningful stakeholder consultation, and robust, culturally appropriate grievance mechanisms.

3.2 Gap Analysis and Alignment:

- Gaps Identified: Nigerian law does not require livelihood restoration, does not explicitly mandate consultation, and does not recognize informal or vulnerable groups for compensation. ESS5 addresses these gaps by requiring broader social safeguards, including eligibility for non-title holders and explicit measures for vulnerable populations.
- Bridging the Gaps: The Kaduna BRT Resettlement Policy Framework (RPF) commits to applying full replacement cost for compensation, including informal and vulnerable groups, implementing livelihood restoration programs, strengthening grievance mechanisms, and adopting whichever standards provide greater protection to affected persons.

3.3 Guidance for RAP Preparation:

- Ensure all compensation is at full replacement cost, not depreciated value.
- Identify and include all affected persons, including informal occupants and vulnerable groups, in the eligibility criteria.
- Develop and implement livelihood restoration programs for those whose livelihoods are impacted.
- Establish and publicize accessible grievance mechanisms.
- Conduct meaningful stakeholder consultations throughout the RAP process.
- Monitor compliance continuously to ensure alignment with international best practices.

By aligning the RAP with ESS5 and the enhanced provisions of the Kaduna BRT RPF, the project will meet both national and international requirements, ensuring fair treatment and improved outcomes for all affected persons.

4.0 Issues Discussion Session

ISSUE RAISED OR QUESTION		RESPONSES	
Actual Issue	Raised by	Actual Issue	Response by
Due to the legal considerations around determining persons eligible for compensation and assistance, representatives from Ministry of Justice should be included in the implementation arrangements for KBRT RAP	Rep of MPW&I	The PMU of KBRT project has onboarded a legal officer representing the Ministry of Justice	KBRT PMU Social & Community Engagement Specialist
		The Citizen's Mediation Centre of Kaduna MOJ was also identified (based on their potential role in the KBRT RAP GRM design) and invited to the workshop but could not attend	EPCS RAP Consultant

ISSUE RAISED OR QUESTION		RESPONSES	
If the full concept is implemented in the downtown section between Leventis Bridge and Katsina Road roundabout through the central market (Kasuwa) area, the magnitude of impacts would be substantial with consequent heavy compensation payments. Therefore, avoidance Measures should be considered between Leventis junction and Katsina roundabout	Rep of MPW&I	Avoidance options are being considered and meetings have been held between EPCS Design team and government agencies to pedestrianize the sector between Leventis Roundabout and Katsina road.	KADRA representative, EPCS RAP Consultant
Which agencies and capacities are available in Kaduna State to handle statutory compensation for displacement of project-affected persons under projects implemented by Kaduna State government (KDSG) with its own resources.	EPCS RAP Consultant	KADGIS has a unit that deals with Resettlement and Compensation	KADGIS Representative
		There is also a legal Unit in KADSTRA that provides Alternative Dispute Resolution (ADR) services to members of the public on disputed land ownership matters	KADGIS Representative, RAP Consultant
Who is responsible for the management of the Right-of-Way (ROW) of the proposed corridor (Route 1 = Kawo to Sabo Tasha)?	EPCS RAP Consultant	Kawo - Sabo Tasha road was previously a Federal Highway but has been transferred to the State Government. Consequently, the applicable Right-of-Way width is as specified for state-owned roads	KASUPDA/KADRA representatives
How does KDSG manage the use of the ROW and which agency is responsible?	EPCS RAP Consultant	KASUPDA processes approvals for the use of the ROW. Typically, the use is approved for laying of cables. ROW use fees were charged by KDSG from Telecom Companies until a waiver was granted in recent years.	KASUPDA representatives
The preference, from a social risk management perspective will be to avoid demolition of existing building, if feasible. However, it is necessary to consider	EPCS RAP Consultant	This is a tricky situation that needs to be considered, if demolition of building will occur.	KASUPDA/KADRA representatives
		A one-time exception for these categories of properties will have to be considered, documented in the RAP and followed up during RAP implementation.	EPCS RAP consultant

ISSUE RAISED OR QUESTION		RESPONSES	
options to manage a demolition scenario. There has been some expansion of the road, particularly South-North Lane. This implies that Government has built roads in parts of the space which constituted ROW prior to the expansion. Due this expansion, properties that were formerly outside the ROW limits of the road will now have to be classified as encroachers.			
There is a need to identify other agencies with mandates covering the additional requirements necessitated by gaps between Nigerian law and ESS5. These aspects include • livelihood restoration, • consultations, • specialized and differentiated handling of vulnerable populations, • management of market activities	EPCS RAP Consultant	Identification of MDAs: A table-top exercise was carried out to consider KDSG MDAs, whose mandates are relevant to different aspects of resettlement planning Provision of security for RAP Implementation - Ministry of Internal Security & Home Affairs: To provide security cover for KBRT implementation Livelihood Restoration Support for owners of affected livelihoods - Ministry of Business Innovation - Kaduna State Micro-credit Agency - Kaduna State Enterprise Development Agency Specialized & Differentiated Measures for vulnerable persons - Ministry of Women Affairs & Social Development (oversees the disability board) Community Engagement	All MDAs

ISSUE RAISED OR QUESTION		RESPONSES	
		f. Local Government Ministry g. Specific LGAs with affected locations Support for absorption or reabsorption of affected market traders into markets h. Kaduna Market Management Company NOTE: Full details of the mandate, laws, policies and regulations guiding the various functions of these agencies will be requested for inclusion into the Resettlement Plan.	
It is necessary to consider a coordination mechanism for the delivery of the mandate of several KDSG agencies. Consideration can be given to coordinating the RAP implementation process through the establishment and operationalization of a Resettlement Sub-Committee of KBRT Technical Committee under the broad policy oversight of KBRT Steering Committee. The Social Affairs and Community Engagement Officer/Unit of KBRT PMU will function as secretariat of this subcommittee	EPCS RAP Consultant	The Resettlement Sub-Committee approach agreed to by all participants	All MDAs

5.0 Next Steps

- Letters requesting documents relating to the mandate of the identified agencies would be drafted by the EPCS Consultants and shared with these Agencies. The letters will be marked for the attention of officers from agencies represented at the meeting. Advance copies to facilitate the release of requested documents will be made available. Either electronic or physical copies will be provided as advance copies.
- Upon the completion of the institutional assessment by the EPCS RAP team, another session of the workshop series will be convened to finalize.

ANNEX 9: ASSET INVENTORY DATA COLLECTION FORM

ASSET INVENTORY DATA COLLECTION FORM

(Activity B-2: Inventory and Categorization of Affected Assets)

FORM IDENTIFICATION

- Asset Inventory Form No.: _____
- Linked Household / PAP Form No. (if applicable): _____
- Project / Corridor Section: _____
- Enumerator Name: _____
- Date: ____ / ____ / 20__
- Checked by (Supervisor): _____
- GPS Device / App: _____

SECTION 1: LOCATION & BASIC IDENTIFICATION

(Derived from “Description of Affected Plot / Structure” in Appendix 3)

1. Locality / Community Name: _____
2. Administrative Area (LGA / Ward): _____
3. GPS Coordinates
 - Northing (Y): _____
 - Easting (X): _____
4. Photograph of Asset Taken: ☐ Yes ☐ No
 - Photo file name(s): _____
5. Asset Reference / Tag ID: _____

SECTION 2: ASSET TYPE & USE

(Asset classification required for inventory and later valuation)

6. Type of Asset (tick one):
 - ☐ Land / Plot only
 - ☐ Residential structure
 - ☐ Commercial structure
 - ☐ Mixed-use structure
 - ☐ Kiosk / Stall / Shed
 - ☐ Fence / Wall / Gate
 - ☐ Other improvement (specify): _____

7. Current Use of Asset:

- ☐ Residential
- ☐ Commercial
- ☐ Agricultural
- ☐ Transport-related
- ☐ Vacant / Unused
- ☐ Other (specify): _____

SECTION 3: PLOT / LAND DETAILS (if applicable)

(Adapted from Plot Form in Appendix 3)

- 8. Total Plot Size (m²): _____
- 9. Is the plot wholly affected? ☐ Yes ☐ No
 - If No, estimated remaining size (m²): _____
- 10. Encroachment / Right-of-Way Issue Observed?
☐ Yes ☐ No ☐ Not sure

SECTION 4: STRUCTURE DETAILS (if applicable)

(Condensed from Structure Form in Appendix 3)

- 11. Structure Type:
 - ☐ Detached building
 - ☐ Part of larger compound
 - ☐ Temporary / semi-permanent structure
- 12. Construction Materials:
 - Walls: ☐ Block ☐ Mud ☐ Wood ☐ Metal ☐ Other
 - Roof: ☐ Zinc ☐ Aluminum ☐ Concrete ☐ Other
 - Floor: ☐ Cement ☐ Tile ☐ Earth ☐ Other
- 13. Approximate Year Built: _____
- 14. General Condition:
 - ☐ Very good
 - ☐ Fair
 - ☐ Poor
 - ☐ Dilapidated
- 15. Has there been any major modifications made to the structure since it was originally constructed?
 - ☐ Yes
 - ☐ No
 - ☐ Not relevant

SECTION 5: OWNERSHIP & TENURE STATUS

(Essential for eligibility and entitlement analysis for asset owners. Collection of personal information on individual Project affected persons (PAPs) will be done with interviews using other tools. Details on affected assets that cannot be collected by visual observation during Inventory of Assets will be collected from PAPs in subsequent respondent interviews)

15. Ownership / Occupation Status:

- ☐ Owner with formal title
- ☐ Owner with customary / recognizable claim
- ☐ Tenant / Occupant
- ☐ Squatter / No recognizable claim

16. Name of Asset Owner (if available): _____

17. Is owner present during enumeration? ☐ Yes ☐ No

18. Number of users of the assets (should include owners and tenants)): _____

19. Document Seen (if any):

- ☐ C of O / Title
- ☐ Customary document
- ☐ Agreement / Receipt
- ☐ None

SECTION 6: IMPACT CHARACTERIZATION

(Links asset inventory to displacement analysis)

19. Type of Impact Anticipated: (tick all that apply)

- ☐ Land acquisition
- ☐ Partial structure loss
- ☐ Full structure demolition
- ☐ Temporary access restriction
- ☐ Loss of use / income related to asset

20. Nature of Impact:

- ☐ Permanent
- ☐ Temporary
- ☐ Yet to be confirmed (pending final design)

21. Visible Economic Activity Associated with Asset?

- ☐ Yes ☐ No

○ If yes, describe briefly: _____

SECTION 7: VERIFICATION & OBSERVATIONS

22. Asset Clearly Marked / Tagged on Ground: ☐ Yes ☐ No

23. Additional Observations by Enumerator:

SECTION 8: FOLLOW-UP REQUIREMENTS

(For assets whose owners are absent or unclear)

24. Follow-up Visit Required? ☐ Yes ☐ No

25. Reason:

- ☐ Owner absent
- ☐ Ownership unclear
- ☐ Boundary dispute
- ☐ Other: _____

SECTION 9: TENANTS

(For assets whose owners are absent or unclear)

24. Name of Tenant1:

25. Tenancy Type:

26. Name of Tenant2:

27. Tenancy Type:

28. Name of Tenant3:

29. Tenancy Type:

30. Name of Tenant 4:

31. Tenancy Type:

ENUMERATOR DECLARATION

I confirm that the information captured above reflects observations made on site at the time of enumeration.

- Enumerator Signature: _____
- Date: ____ / ____ / ____

ANNEX 10

KBRT RAP: PAP Socioeconomic Survey Questionnaire

SECTION A: ENUMERATOR & IDENTIFICATION INFORMATION

1. Survey ID (Auto-generated):
2. Enumerator Name & Code:
3. Date of Interview:
4. GPS Coordinates of Affected Asset:
 - Latitude:
 - Longitude:
5. Community / Ward / LGA:
6. Photograph of PAP (required): Upload
7. Date on which affected persons started occupying the affected asset: *(dd/mm/yyyy)*
8. PAP Category (select all applicable):
 - ☐ Physically displaced household
 - ☐ Economically displaced person
 - ☐ Roadside trader (informal) – identified as common along KBRT corridor in reconnaissance findings (economic activities on margins of the road)
 - ☐ Business owner (formal/informal)
 - ☐ Tenant
 - ☐ Landowner
 - ☐ Vulnerable person
 - ☐ Other (specify)

SECTION B: HOUSEHOLD DEMOGRAPHICS

B1. Household Details

1. Name of Household Head (HHH):
2. Sex: ☐ Male ☐ Female
3. Age:
4. Marital Status:
5. Primary Language:

6. HHH Identification Type:

- ☐ ☐ NIN
- ☐ ☐ Voter ID
- ☐ ☐ Driver's License
- ☐ ☐ Other

B2. Household Composition

Name	Relationship to HHH	Sex	YOB	Occupation	Resident on-site?
(Add repeat group)					

SECTION C: EDUCATION & SKILLS

1. Highest Education Level Completed (HHH):

- ☐ ☐ None
- ☐ ☐ Primary
- ☐ ☐ Secondary
- ☐ ☐ Tertiary
- ☐ ☐ Vocational/Apprenticeship

2. Skills Relevant to Livelihood Restoration:

- ☐ ☐ Trading
- ☐ ☐ Artisan (specify)
- ☐ ☐ Transport operator
- ☐ ☐ Agriculture
- ☐ ☐ Service provider
- ☐ ☐ Other (specify)

SECTION D: HOUSING & OCCUPANCY STATUS (Physical Displacement Risk)

1. Type of Affected Structure:

- ☐ ☐ Residential building

- ☐ Shop/kiosk/shed
- ☐ Moveable stall
- ☐ Mixed use (house + business)
- ☐ Fence/attachment
- ☐ Other

2. Ownership Status:

- ☐ Owner (documented)
- ☐ Owner (undocumented)
- ☐ Tenant
- ☐ Squatter/Encroacher

3. Building condition:

- ☐ Very good
- ☐ Fair
- ☐ Poor
- ☐ Unusable

4. Utilities Present:

- ☐ Water connection
- ☐ Electricity
- ☐ Toilet inside structure
- ☐ Access to drainage
- ☐ None

5. Do you have an alternative accommodation available to you and your household?

- ☐ Yes
- ☐ Yes, but not fully habitable
- ☐ No (*If No, skip to Section E*)

6. What is the approximate distance, in Kilometres, between this residence (affected asset) and the alternative residential/commercial accommodation indicated in D5 above?

- ☐ Less than 1km

- ☐ 1 - 5 km
 - ☐ Above 5 km
7. ☐ No *(If No, skip to Section E)*

SECTION E: LAND OWNERSHIP & USE (ESS5-Based)

1. Type of land affected:
 - ☐ Residential plot
 - ☐ Business plot
 - ☐ Agricultural land
 - ☐ Vacant/undeveloped
2. Land Tenure Type
 - ☐ Registered title
 - ☐ Title in progress
 - ☐ Customary ownership
 - ☐ Government allocation
 - ☐ Informal occupation
3. Is the ownership of the asset or property in dispute?
 - ☐ Yes
 - ☐ Yes, but has been resolved
 - ☐ No *(If No, skip to Question D.5)*
4. How long did has the dispute been going on (or last before it was resolved)?
 - _____ (estimate length of time in months)
5. Total land area (m²): _____
6. Portion affected by KBRT: _____
7. Crops or economic trees present?
 - ☐ Yes
 - ☐ No
 - If yes, specify type & number.

SECTION F: LIVELIHOOD & INCOME SOURCES (Economic Displacement)

F1. Main Income Source

- ☐ Roadside trading
- ☐ Shop-based business
- ☐ Artisan
- ☐ Salary earner
- ☐ Transport worker
- ☐ Agriculture
- ☐ Other (specify)

F2. Monthly Household Income Range

- ☐ < ~~N~~20,000
- ☐ ~~N~~20,000-~~N~~50,000
- ☐ ~~N~~50,001-~~N~~77,000
- ☐ ~~N~~77,001-~~N~~100,000
- ☐ ~~N~~100,001-~~N~~200,000
- ☐ > ~~N~~200,000

F3. Does your livelihood depend on the affected location?

- ☐ Fully
- ☐ Partially
- ☐ Not at all

F4. Estimated income loss if displaced:

- ☐ < 25%
- ☐ 25-50%
- ☐ 50-75%
- ☐ > 75%

SECTION G: VULNERABILITY ASSESSMENT

1. Does your household contain any of the following:

- ☐ Elderly (65+)

- ☐ Person with disability
 - ☐ Pregnant/nursing mother
 - ☐ Chronically ill person
 - ☐ Female-headed household
 - ☐ Child-headed household
 - ☐ Extreme poor
2. Is the PAP socially or economically marginalized?
- ☐ Yes
 - ☐ No
3. Does any member of your Household have a need for Special assistance?
- ☐ Transport support
 - ☐ Livelihood support
 - ☐ Temporary shelter
 - ☐ Counseling
 - ☐ Medical support
 - ☐ Other

SECTION G: COMMUNITY NETWORKS & SOCIAL SERVICES

1. Distance to nearest school:
2. Distance to nearest health facility:
3. Will displacement disrupt access to valuable social services?
4. Membership in community groups or associations:
 - ☐ Yes
 - ☐ No
5. Dependence on local networks for livelihood/support:
 - ☐ High
 - ☐ Moderate
 - ☐ Low
 - ☐ None

SECTION I: COMPENSATION PREFERENCES

1. Preferred compensation option:
 - ☐ Cash for structures
 - ☐ Cash + relocation assistance
 - ☐ Land-for-land (where applicable)
 - ☐ Shop-for-shop (business continuity)
 - ☐ In-kind materials provided
 - ☐ Temporary relocation support
2. Preferred livelihood restoration measures (*select all that apply*)
 - ☐ Cash grant
 - ☐ Business support (equipment/stock)
 - ☐ Training
 - ☐ Employment under KBRT project
 - ☐ Micro-credit facility
 - ☐ Market stall allocation

SECTION J: GRIEVANCE & CONSULTATION

1. Were you previously informed about the KBRT project?
2. Have you attended any stakeholder meeting?
3. Preferred grievance channel:
 - ☐ Community leader
 - ☐ Community-based Grievance committee
 - ☐ SMS/phone line
 - ☐ Project office
 - ☐ Others (*please specify*)
4. Concerns or suggestions related to displacement:

SECTION K: DECLARATION & SIGNATURES

- PAP Name & Signature (or thumbprint)
- Enumerator Signature

- Date

ANNEX 11

KBRT RAP — BUSINESS DATA COLLECTION FORM (FOR FORMAL & INFORMAL ENTERPRISES)

SECTION A: ENUMERATOR & IDENTIFICATION DETAILS

1. Enumerator Name & ID:
2. Date of Interview:
3. Time of Interview:
4. GPS Coordinates of Business Location:
 - Latitude:
 - Longitude:
5. Photograph of Business (required):
6. Affected Business Category:
 - ☐ Formal business in commercial building
 - ☐ Informal roadside trader (mobile or fixed stall)
 - ☐ Artisan workshop
 - ☐ Transport related business
 - ☐ Other (specify):
7. Business Form Number / Enumeration Code:

SECTION B: BUSINESS OWNERSHIP DETAILS

1. Owner's Full Name:
2. Sex: ☐ Male ☐ Female
3. Age:
4. Phone Number:
5. Residential Address:
6. Is the business owner also the operator?
 - ☐ Yes
 - ☐ No → Provide operator details below
7. Operator Name (if different):
8. Identification Presented:
 - ☐ NIN
 - ☐ Voter ID
 - ☐ Business Registration Certificate
 - ☐ None
9. PAP Category:
 - ☐ Owner of business
 - ☐ Tenant of commercial space
 - ☐ Street trader (no formal tenancy)
 - ☐ Apprentice/employee (for impact screening)

SECTION C: BUSINESS LOCATION & TENURE

1. Type of business location:
 - ☐ Permanent shop in commercial building
 - ☐ Kiosk/container
 - ☐ Roadside table/umbrella
 - ☐ Moveable pushcart
 - ☐ Workshop
 - ☐ Other:
2. Ownership/Occupancy Status:
 - ☐ Owner of structure
 - ☐ Tenant (paying rent)
 - ☐ Borrowed/allowed to stay
 - ☐ Informal occupancy (no rent paid)
3. If tenant:
 - Monthly rent (₦):
 - Rental agreement type: ☐ Written ☐ Verbal ☐ None
4. Years of Business Operation at this Site:
 - ☐ <1 year
 - ☐ 1-3 years
 - ☐ 3-5 years
 - ☐ >5 years
5. Is the business dependent on foot traffic/roadside visibility?
 - ☐ Yes
 - ☐ No

SECTION D: TYPE OF BUSINESS & OPERATIONS

1. Business Type (tick one):
 - ☐ General retail
 - ☐ Food vendor (cooked food)
 - ☐ Restaurant / canteen
 - ☐ Market stall (fruits, vegetables, grains etc.)
 - ☐ Artisan (tailor, mechanic, carpenter etc.)
 - ☐ Transport-related (spare parts, vulcanizer, fuel retailer, ticket seller)
 - ☐ Phone/computer services
 - ☐ Hairdresser/barber
 - ☐ Wholesale trade
 - ☐ Other:
2. Days of operation per week:
 - ☐ 3-4 days
 - ☐ 5-6 days
 - ☐ 7 days
3. Typical operating hours:
 - Opening:
 - Closing:
4. Number of Employees:
 - Full-time paid staff:

- Part-time paid staff:
- Unpaid family workers:
- 5. Is the business registered with any authority?
 - ☐ Yes → CAC / Association / Local Government
 - ☐ No
- 6. Membership of Trade/Market Association: (important for consultation & support)
 - ☐ Yes (specify)
 - ☐ No

SECTION E: BUSINESS ASSETS & INFRASTRUCTURE

1. Structure used by business:
 - ☐ Permanent building
 - ☐ Wooden/metal stall
 - ☐ Table/umbrella
 - ☐ Container/shop
 - ☐ Vehicle/pushcart
 - ☐ Other
2. Ownership of structure:
 - ☐ Owned
 - ☐ Rented
 - ☐ Informally occupied
3. Inventory of key physical assets (list):
 - Tables, shelves, fridges, freezers
 - Cooking equipment
 - Stock storage
 - Machines/tools
 - Generator
 - Others
4. Any hazardous or sensitive materials stored?
 - ☐ Fuel
 - ☐ LPG
 - ☐ Chemicals
 - ☐ None

SECTION F: BUSINESS FINANCIAL PROFILE

(Core section for planning compensation & assistance measures)

1. Average Daily Sales (₦):
 - Low season:
 - Peak season:
 - Typical day:
2. Average Monthly Revenue (₦):
3. Average Monthly Profit (₦):
4. Monthly Operating Costs (₦):

- Rent:
- Salaries:
- Utilities:
- Raw materials/stock:
- Transportation:
- Other operating costs:
- 5. Seasonality of income:
 - ☐ Seasonal
 - ☐ Stable
- 6. Percentage of household income from this business:
 - ☐ <25%
 - ☐ 25-50%
 - ☐ 50-75%
 - ☐ >75%
- 7. Record-keeping system:
 - ☐ Written
 - ☐ Digital
 - ☐ None
- 8. Evidence of financial data presented:
 - ☐ Receipts
 - ☐ Stock records
 - ☐ Sales book
 - ☐ Bank statements
 - ☐ None

SECTION G: ASSESSMENT OF IMPACTS ON BUSINESS

1. Nature of expected impact: (Select all that apply):
 - ☐ Full loss of business site
 - ☐ Temporary loss of access to business site
 - ☐ Permanent loss of access by delivery and haulage vehicles servicing the business premises
 - ☐ Partial loss of frontage / setback / veranda space
 - ☐ Removal or demolition of stall, kiosk, or movable structure
 - ☐ Restricted customer access due to construction activities
 - ☐ Loss of parking or loading/unloading space
 - ☐ Temporary relocation required
 - ☐ Other
2. Expected reduction in turnover:
 - ☐ < 25%
 - ☐ 25-50%
 - ☐ 50-75%
 - ☐ >75%
 - ☐ Total loss of income
3. If displacement occurs, can this business continue elsewhere?
 - ☐ Yes—relocatable

- ☐ Yes—with assistance
 - ☐ No—location-dependent
4. Estimated cost of restarting business elsewhere:
- Structure setup:
 - New rent advance:
 - Transport of goods:
 - Re-stocking costs:
 - Other needs:

SECTION H: LIVELIHOOD RESTORATION NEEDS

1. Support required to restore income: (tick all that apply)
- ☐ Cash compensation for lost income
 - ☐ Assistance to relocate (transport, logistics)
 - ☐ Provision of new stall/kiosk
 - ☐ Temporary business space
 - ☐ Business continuity grant
 - ☐ Skills training
 - ☐ Access to micro-credit
 - ☐ Replacement of damaged equipment
 - ☐ Support to re-stock inventory
2. For informal traders:
- Preferred location for reassignment of trading space:
 - Market/association preferences

SECTION I: VULNERABILITY SCREENING

1. Is the business owner any of the following?
- ☐ Woman head of household
 - ☐ Elderly (65+)
 - ☐ Person with disability
 - ☐ Sole income earner for household
 - ☐ Extremely poor
 - ☐ Youth (<30) entrepreneur
 - ☐ None
2. Special assistance required:

SECTION J: GRIEVANCE REDRESS & CONSULTATION

1. Awareness of grievance mechanism:
- ☐ Yes
 - ☐ No
2. Preferred channel for receiving updates:
- ☐ SMS
 - ☐ Phone call
 - ☐ Community leader

- ☐ Trader association
- ☐ Other

3. Concerns raised by business owner regarding KBRT project:

SECTION K: DECLARATION & SIGNATURES

- Enumerator Signature:
- Business Owner Signature (or thumbprint):
- Date:

ANNEX 12

Measures to Avoid or Minimise Displacement on the KBRT Corridor (Latest design date referenced: 26 March 2026)

Impact Avoidance / Minimisation Measure	How the Measure Reduces Displacement	Status in Latest Design (26.03.2026)
1. Offset / Split-Island Station Designs in Restricted Corridors (Ahmadu Bello Way, Junction Road)	Reduces need for land take by fitting stations within restricted RoW.	Incorporated. The design has adopted offset/split island stations to avoid building impacts.
2. Designing Alignment to Avoid Building Demolitions	Minimises displacement by designing alignment to avoid encroaching on existing buildings.	Partially incorporated. Designs “avoid building impacts” except at Junction Road where space is “very restricted.”
3. Alternative Access Roads (Adaptation of Street Networks)	Reduces pressure on central corridor, reducing need for corridor widening and demolition.	Incorporated. Alternative access routes have been included in latest design proposals.
4. Maintaining Controlled Parking / Regulated Parking Lanes Where Feasible	Avoids displacement of roadside businesses by maintaining functional access.	Partially incorporated, but designs still missing clear provision for delivery/parking.
5. Shared Surface Concept (Daytime Pedestrian, Night-time Service Access)	Minimises displacement by avoiding need for widening while maintaining service access.	Not incorporated. Proposed by RAP team but not taken up in design yet.
6. No Bypass Lanes at All Stations	Avoids widening and land acquisition required for overtaking lanes.	Likely to be incorporated, pending PMU/AFD alignment.
7. Lateral Platform Stations (Instead of Central Platforms)	Allows use of standard buses; reduces long-term pressure for corridor widening during fleet renewals.	Not incorporated yet, but strongly recommended by AFD/PMOD.
8. Avoiding Single-Lane General Traffic in City Centre	Prevents congestion that would trigger future widening and displacement.	Not incorporated. Current design still proposes one lane per direction.
9. Minimising Works to BRT Lanes Only in Certain Sections	Reduces the need for land acquisition (“façade to façade” designs exceed budget).	Not yet incorporated. AFD states EPCS should identify sections where only BRT-lane works are needed.

Impact Avoidance / Minimisation Measure	How the Measure Reduces Displacement	Status in Latest Design (26.03.2026)
10. Reviewing Pedestrian Access to Stations to Avoid Unsafe Crossings That Could Require Widening	Good pedestrian design reduces need for footbridges/land acquisition.	Not incorporated. Pedestrian access missing from many station drawings.
11. Pedestrianisation / Transit Mall Concept for Central Area	Removes need for general traffic lanes → avoids widening → avoids demolition.	Not incorporated. Both AFD and Systra also recommend reviewing central area design to include a transit mall.
12. Avoiding Over-Provision of Walkway Width Where Unnecessary	Helps avoid widening the corridor in low-pedestrian areas.	Not incorporated, as current walkway width is fixed (2.4m).

ANNEX 13

Matrix of Responses to Comments Received from AFD Team (3rd August, 2026)

Questionnaire Section	Dominik's Comment	Action Taken / Response
Asset Inventory Form, Section 3: Plot/Land Details	Add a question on "date of first occupation/acquisition of the plot" to support eligibility verification and ownership issues.	Not added to the Asset Inventory Form. The RAP team considers duration of occupation not directly relevant to eligibility or entitlement determination. Instead, a related question has been added to the Socioeconomic Survey (SES) Questionnaire: <i>"Date on which affected persons started occupying the affected asset"</i> (Section A, Item 7). This information will be used to assess place attachment and support livelihood restoration analysis.
Asset Inventory Form, Section 4: Structure Details	Add a question on major extensions or modifications made after initial construction.	Accepted. New question added under Section 4: <i>"Has there been any major modifications made to the structure since it was originally constructed?"</i> (Yes/No/Not Relevant).
Asset Inventory Form, Section 5: Ownership & Tenure Status	Add a point on competing ownership or occupancy claims.	Not added to the Asset Inventory Form to keep the rapid inventory tool concise. Instead, the issue has been captured in the SES Questionnaire through new dispute-related questions under Section E.
SES Questionnaire, Section A	Add question on date when household started occupying affected location.	Accepted. New question inserted: <i>"Date on which affected persons started occupying the affected asset (dd/mm/yyyy)."</i>
SES Questionnaire, Section D: Housing & Occupancy Status	Add questions on main residence and alternative accommodation.	Accepted in principle. Alternative accommodation questions have been added: (i) availability of alternative accommodation; and (ii) distance to alternative accommodation.
SES Questionnaire, Section E: Land Ownership & Use	Add a question on disputes affecting land or structures.	Accepted. Two new questions added: (i) whether ownership/property is disputed; and (ii) duration of dispute (or how long it lasted before resolution).
Asset Inventory Form, Section 9 (Tenants)	Errors identified in Tenant Numbering	Corrected numbering of tenants from repeated "Tenant 2" entries to Tenant 1-4.

Additional Changes Effectuated in the Questionnaire (Not Directly Linked to Dominik's Comments)

The revised version contains several amendments beyond those explicitly requested by Dominik:

Section	Change Introduced	Observation
Asset Inventory Form, Section 4	Added "Has there been any major modifications made to the structure since it was originally constructed?"	Directly linked to Comment 2.
SES Questionnaire, Section G (Vulnerability Assessment)	Wording expanded from "Special assistance needed" to "Does any member of your household have a need for special assistance?" with more structured response options.	Additional enhancement.
SES Questionnaire, Community Networks & Social Services Section	Added response options (Yes/No) for community group membership and expanded dependency scale to include "None".	Additional enhancement.
SES Questionnaire, Grievance Section	Expanded "Grievance committee" to "Community-based Grievance Committee" and added "Others (please specify)."	Additional enhancement.
SES Questionnaire, Compensation Preferences Section	Added clarification "(select all that apply)" for livelihood restoration measures.	Additional enhancement.

---END---