IMMUNISATION PLUS AND MALARIA PROGRESS BY ACCELERATING COVERAGE AND TRANSFORMING SERVICES (IMPACT) PROJECT

Resettlement Action Plan of Fifty-Three (53) PHC Facilities across 15 Participating States

FINAL REPORT

TABLE OF CONTENTS

LIST OF FIGURES

LIST OF TABLES

DEFINITIONS

Involuntary Resettlement: This refers to displacement that occurs as a direct result of project-related land acquisition or restriction on land use. This may cause physical displacement, or economic displacement. For all projects that involve involuntary resettlement, a Resettlement Action Plan is required.

Resettlement Action Plan (RAP) is the comprehensive plan designed to address the impacts of involuntary resettlement ensuring effective and equitable resettlement processes.

Physical Displacement: This includes relocation, loss of residential land or loss of shelter.

Economic Displacement: Loss of land, assets, or access to assets, including those that lead to loss of income sources or other means of livelihood.

Livelihood Restoration: Livelihood restoration refers to additional support provided to assist PAPs and PAHs gain sustainable restoration of their livelihoods to or exceeding pre-project level. It is noteworthy that the livelihood restoration program is not a replacement of the compensation, but seeks to ensure that vulnerable PAPs are provided with sustainable livelihood measures/alternative. For this RAP, the criteria include vulnerable PAPs categorized by age (≥60 years), physical/mental health conditions (disability/special needs), widows and women-headship of household. (See section 4.8 for vulnerability assessment).

Cut-off Date: This refers to the date beyond which any person who occupies land or assets, or constructs assets on land, required for project use, will not be eligible for compensation. The date is often the day when the assessment of persons and their property in the project area is completed. It is also the date after which no new cases of affected people will be considered. The establishment of a cut-off date is required to prevent opportunistic invasions /rush migration into the chosen land thereby posing a major risk to the project. (PAPs and community members were informed of the cut-off date during consultations, and the implication of the cut-off date was explained).

Project Affected Persons (PAPs) and Project Affected Households (PAHs): PAPs refer to all persons who, as a result of proposed works may incur: (i) relocation or loss of shelter, such as houses; (ii) loss of assets or access to assets, such as land or crops; or (iii) loss of income sources or means of livelihood whether or not the affected persons must move to another location, such as stalls or productive activities on the land. PAHs refer to households of PAPs who may experience consequential impacts of the involuntary displacement or losses as a result of the project activities. (The socioeconomic analysis described the PAHs).

Full Replacement Cost: Full Replacement Cost is defined as a method of valuation yielding compensation sufficient to replace assets, plus necessary transaction costs associated with asset replacement. In the case of this RAP, the full replacement costs for structures, and economic trees (productive capacity), were computed from the current market value. Full replacement cost for land was determined per square meter for agricultural and non-agricultural land from the local community.

ABBREVIATIONS

CBN	Central Bank of Nigeria
CERC	Contingent Emergency Response Component
ESMF	Environmental and Social Management Framework
FCT	Federal Capital Territory
FGD	Focus Group Discussion
FPIU	Federal Project Implementation Unit
GBV	Gender Based Violence
GR	Grievance Redress
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IMPACT	Immunization Plus and Malaria Progress by Accelerating Coverage and Transforming Services
LGA	Local Government Authority
M & E	Monitoring and Evaluation
MPA	Multiphase Programmatic Approach
NGN	Nigerian Naira
NMEP	National Malaria Elimination Program
NPHCDA	National Primary Health Care Development Agency
OIC	Officer in Charge
OP	Operational Policy
PAD	Project Appraisal Document
PAH	Project Affected Household
PAP	Project Affected Person
PDO	Project Development Objective
PHC	Primary Healthcare Centre
PIU	Project Implementation Unit
RAP	Resettlement Action Plan
RC	Reinforced Concrete
RIC	Resettlement Implementation Committee
RMNCAH	Reproductive, Maternal, Newborn, Child, and Adolescent Health
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SPIU	State Project Implementation Unit
SSO	Social Safeguards Officer
TOR	Terms of Reference
USD	United States Dollars
VLD	voluntary land donation
WDC	Ward Development Committee

EXECUTIVE SUMMARY

ES 1 Background

This Resettlement Action Plan (RAP) was developed under the Nigeria Improved Child Survival Program for Human Capital (IMPACT) Project, implemented by the Federal Ministry of Health (FMoH) through the National Primary Health Care Development Agency (NPHCDA) and the National Malaria Elimination Program (NMEP), with support from the World Bank. The project seeks to reduce under-five mortality by improving the quality and utilization of immunization and malaria services across 28 participating states. Under Component 2 (Immunization Plus), the project supports the rehabilitation and construction of 2,625 Primary Health Care Centres (PHCs) to meet national standards, with an additional 450 facilities planned in Kebbi, Niger, and the FCT. Due to emerging social concerns involving land acquisition in 53 PHCs across 15 states, this RAP was prepared in line with World Bank Operational Policy (OP) 4.12 to assess and mitigate resettlement impacts. The RAP identifies Project Affected Persons (PAPs) and Households (PAHs), establishes eligibility criteria for compensation, and outlines grievance redress and institutional arrangements. Methodologically, it involved desk reviews, stakeholder consultations, field surveys, socioeconomic assessments, and legal-institutional analyses. Findings revealed limited cases of economic and physical displacement due to voluntary land acquisition for PHC expansion, construction of staff quarters, and related infrastructure such as fencing, boreholes, and solar systems. The RAP provides an implementation framework to ensure fair compensation, livelihood restoration, and sustainable project delivery in compliance with both national laws and World Bank safeguard policies.

ES 2: Description Project Location

The six states of Benue, Kogi, Nasarawa, Oyo, Plateau, and Taraba, where Project Affected Persons (PAPs) were identified, span Nigeria's North-Central, South-West, and North-East regions, each with distinct socioeconomic and environmental contexts relevant to the IMPACT Project. These predominantly agrarian states are characterized by rural and semi-urban settlements whose livelihoods depend on farming, trading, and other land-based activities. In Benue and Kogi States, fertile agricultural zones and riverine communities rely on crop production and fishing, while in Nasarawa and Plateau, mixed rural–urban settlements experience growing pressure on limited land and health infrastructure. Oyo and Taraba States combine agricultural and commercial livelihoods, with land and natural resources central to household sustenance. Although minor land acquisition for PHC rehabilitation caused temporary livelihood disruptions, the overall impacts are positive, enhancing access to quality healthcare, supporting livelihood restoration, and aligning with the World Bank's OP 4.12 principles of equitable resettlement and improved community wellbeing.

ES 3 Census and Socioeconomic Profile of PAPS

The socioeconomic survey was conducted among the 15 Project Affected Persons (PAPs) identified across the nine Primary Health Centres (PHCs) in Benue, Nasarawa, Oyo, and Taraba States. All the fifteen (15) PAPs were successfully interviewed. The survey aimed to understand the demographic and livelihood characteristics of affected persons to inform appropriate resettlement planning and mitigation measures. Parameters considered included gender, age, marital status, education, occupation, income level, household size, and access to housing amenities such as water, sanitation, and waste management facilities.

Findings from the survey reveal that the affected population consists of a balanced gender distribution (7 males and 8 females), with most PAPs being middle-aged or elderly, reflecting limited participation of youths in land ownership and livelihood activities associated with the affected sites. Marital status data show that most PAPs are married, though a few widows were identified, particularly in Benue and Oyo States, indicating a need for gender-sensitive livelihood support. Household size analysis showed that many PAPs have large or extended families, which increases the potential socioeconomic impact of land loss on dependents. Education levels vary widely, from tertiary education in urban areas such as Ameka to low or no formal education in rural PHCs like Odebo and Angwan Mallam, affecting their capacity to engage with resettlement procedures and livelihood restoration opportunities.

In terms of livelihood, the dominant occupation among PAPs is farming and trading, while a few are artisans or civil servants. Average monthly income ranges from below ₦30,000 to above ₦200,000,

with rural PAPs showing lower income levels and higher vulnerability to project-induced shocks, though socioeconomic vulnerability was more pronounced among the elderly and households with large dependents. Overall, community perception of the IMPACT project is positive, with most PAPs recognizing the long-term benefits of improved healthcare access and local development despite short-term livelihood disruptions. These findings underline the need for targeted assistance to vulnerable households, livelihood restoration for affected farmers and traders, and continuous stakeholder engagement to sustain community support during RAP implementation.

ES 4 Policy, Legal and Regulatory Framework

The legal, policy, and institutional framework guiding the implementation of the Resettlement Action Plan (RAP) for the IMPACT Project in compliance with Nigerian laws and the World Bank's Operational Policy (OP 4.12) on Involuntary Resettlement. It reviews the Resettlement Policy Framework (RPF), which ensures that Project Affected Persons (PAPs) are adequately informed, consulted, and compensated at full replacement cost while restoring their livelihoods to at least pre-project conditions. The chapter highlights relevant national laws, including the 1999 Constitution, which guarantees property rights and mandates prompt compensation; the Land Use Act of 1978, which governs land acquisition and compensation; and other relevant instruments such as the State Urban Planning and Development Board (Amendment) Law (2011), the Forestry Act, and the National Gender Policy, which collectively promote sustainable development, gender inclusion, and environmental protection. The administrative roles of the State Ministries of Lands and Surveys and Local Government Authorities are detailed as key actors in land administration and dispute resolution. A gap analysis compares Nigerian laws with the World Bank's OP 4.12, revealing that while both frameworks emphasize compensation, the World Bank's policy provides broader protection, covering informal occupants, livelihood restoration, and proactive grievance redress mechanisms. Accordingly, this RAP adopts the more stringent World Bank standards to ensure fairness, transparency, and social sustainability. The World Bank's policy on voluntary land donation is also clearly defined, establishing clear criteria to ensure that donations are genuinely voluntary, well-documented, and free of coercion or adverse livelihood impacts, with mechanisms for redress and return of land if unused.

ES 5 Identification of Project Impacts and Project Affected Persons

This identifies and analyzes the social and economic impacts arising from land acquisition and construction activities under the IMPACT Project across 53 Primary Health Centres (PHCs). A total of 15 Project Affected Persons (PAPs), comprising 7 males and 8 females, were identified in four states: Benue, Nasarawa, Oyo, and Taraba. Most impacts were minor and localized, involving 1–2 PAPs per PHC, mainly due to loss of small farmlands, residential structures, and business spaces. The largest number of PAPs were found at Ojoo PHC in Oyo State, where 8 PAPs were affected by the displacement of shops and makeshift structures.

To minimize resettlement impacts, several mitigation measures were adopted, including voluntary land donation (VLD), prioritization of existing public/community land, and design optimization to reduce land take. All donations and acquisitions were documented, verified, and consented to by communities. Consultations and stakeholder engagements ensured transparency, with a Grievance Redress Mechanism (GRM) established to address any disputes or residual impacts. The project also generated positive outcomes, including improved community health infrastructure, employment opportunities during construction, enhanced service delivery through provision of boreholes and solar systems, and stronger community-government partnerships. However, negative impacts included the permanent loss of structures, economic trees (cashew), farmlands, and temporary income disruptions accross 7 PHCs (13.2% of total 53PHCs with land acquisition). Despite these, the overall resettlement impacts remain small-scale, site-specific, and manageable through the RAP's compensation and livelihood restoration measures, in alignment with the World Bank's OP 4.12 and Nigerian land laws.

ES 6 Eligibility

The census exercise facilitated the identification of all individuals affected by the project and established their eligibility for compensation and the appropriate form of assistance. Persons residing within the project corridor who meet the eligibility criteria include:

- Individuals with formal legal rights to land, including those holding customary or traditional rights recognized under Nigerian law.

- Individuals without formal legal rights at the commencement of the census but who have a legitimate claim to such land or assets, provided that such claims are recognized under national laws or validated through the process defined in this Resettlement Action Plan (RAP).
- Individuals without any recognizable legal right or claim to the land they occupy shall also be regarded as Project Affected Persons (PAPs) and will be eligible for appropriate compensation

ES 7 Consultation

Stakeholder consultations were conducted between 20th August and 9th September 2025 across all Primary Health Centres (PHCs) where Project Affected Persons were identified in the six states - Benue, Kogi, Nasarawa, Oyo, Plateau, and Taraba, as part of the Resettlement Action Plan (RAP) preparation under the IMPACT Project. The engagements involved community leaders, Project Affected Persons (PAPs), women, youth groups, Ward Development Committees (WDCs) Chairmen, and health officials. These consultations provided a platform for open dialogue, disclosure of project objectives, and participatory assessment of potential social and livelihood impacts.

Participants were informed about the project's scope, implementation, and their rights under the World Bank's Operational Policy 4.12, including the right to compensation, resettlement assistance, and access to the Grievance Mechanism (GM). Communities were encouraged to express concerns, suggestions, and expectations regarding land acquisition, construction impacts, and livelihood restoration. The process was culturally inclusive, emphasizing voluntary land donation, informed consent, and transparency to strengthen community ownership and social accountability.

Across the project states, findings revealed that most lands used for PHC construction or rehabilitation were voluntarily donated by individuals, families, or communities, with a few requiring involuntary resettlement with minor economic and physical displacements due to loss of farmlands, small shops, or structures. In all cases, there was broad community support for the project, driven by recognition of its health and socioeconomic benefits. Functional but mostly traditional GRM systems were found to exist in all communities, managed by elders, local councils, or PHC committees, while formal GM mechanisms, including complaint boxes and focal persons, are being integrated through the project's safeguards structure.

Key issues raised during consultations included the need for proper land documentation, inclusive stakeholder engagement, livelihood support for affected persons, and greater participation of local artisans in construction works. In some cases, affected families expressed concerns about inadequate consultation or lack of compensation for loss of structures (permanent and makeshift), though most grievances were amicably resolved through traditional mediation. Overall, the consultations confirmed strong local cooperation, minimal disputes, and alignment of land donation and acquisition processes with World Bank safeguard principles.

The outcomes reaffirm that community participation and grievance management remain central to RAP implementation. The process fostered mutual understanding, transparency, and trust between project authorities and host communities, laying a solid foundation for sustainable resettlement outcomes and improved primary healthcare delivery across the six states.

ES 8 Grievance Mechanisms

The framework for addressing grievances that may arise during the implementation of the RAP under the IMPACT Project. The Grievance Mechanism (GM) provides an accessible, transparent, and culturally appropriate process for resolving complaints from Project Affected Persons (PAPs) and other stakeholders regarding land acquisition, compensation, and project impacts. The GM aims to promote early resolution of disputes, reduce litigation, and maintain community trust through effective communication and timely redress. Grievances may stem from issues such as compensation valuation, ownership disputes, or delays in payment. The mechanism follows a four-step process, reception and registration, resolution, appeal, and monitoring, ensuring all complaints are acknowledged within 48 hours and resolved within 15 to 30 days. Grievance Redress Committees (GRCs) will be established at the community, local government, state, and national levels, comprising community leaders, PAP representatives, and project officials. The committees will record, categorize, and resolve grievances, escalating complex cases to higher levels when necessary.

The GM also aligns with World Bank OP 4.12 requirements and includes provisions for handling Gender-Based Violence (GBV) complaints through a confidential and survivor-centered process. Overall, the GM strengthens accountability, ensures equitable treatment of PAPs, and supports continuous learning and improvement in RAP implementation.

ES 9 Monitoring & Evaluation

The monitoring and evaluation (M&E) framework established to ensure effective implementation of the Resettlement Action Plan (RAP) in line with the World Bank's safeguard requirements and national standards. The chapter emphasizes that monitoring will verify prompt delivery of compensation and resettlement assistance, functionality of the Grievance Mechanism (GM), and contractor compliance with social and environmental safeguards. Two levels of monitoring are defined: internal monitoring, led by the Social Safeguard and M&E Officers within the State Project Implementation Unit (SPIU), and independent external monitoring, to be conducted periodically by qualified third-party consultants or organizations. Internal monitoring will track implementation progress, compensation disbursement, and community participation, while external monitoring will provide objective verification of compliance, livelihood restoration, and social impact outcomes. Key indicators cover compensation delivery, grievance resolution, livelihood restoration, community engagement, and institutional capacity building. A comprehensive monitoring matrix has been developed to guide both internal and external oversight. Upon completion of RAP implementation, an independent RAP Completion Audit will be undertaken to confirm that project objectives have been achieved, PAPs' living standards restored or improved, and mitigation measures fully implemented prior to project closure.

ES 10 RAP Coordination and Implementation

The primary responsibility for the RAP implementation is on the SPIU. The SPIU shall establish a RAP Implementation/Resettlement Committee (RIC) to coordinate and facilitate the compensation and resettlement of PAPs. The SPIU may carry out other responsibilities associated with the RAP implementation and may appoint other Agents or consultants for capacity building, monitoring & evaluation and reporting to the FPMU and the World Bank.

ES 11 Training and Capacity Needs

The implementation of this RAP shall require that personnel and stakeholders possess the appropriate capacity. This capacity building plan has been taken into consideration in this report based on the capacity assessment of the Community Conflict/Grievance Redress Committee, Resettlement Implementation Committee (RIC) as well as the community representatives and PAPs.

ES 12 RAP Implementation Budget

The estimated cost for implementation of the RAP is Twenty-Seven Million, and Seventy-three Thousand Naira **(₦ 27,073,000.00**) (Eighteen Thousand, Five Hundred and Two Dollars, Twenty-two Cents – **$ 18,502.22**) as shown in the Table ES-12

ES-12: RAP Budget

SN	Item	Amount	
	COMPENSATION COST	**₦**	**USD**
A	Full Replacement cost for Loss of Asset	2,820,000	1,927.24
	Business Disturbance	2,500,000	1,708.55
	Disturbance/Relocation	240,000	164.02
	Vulnerability Adjustment Support	500,000	341.71
	Livelihood Restoration Support Program for Vulnerability (LRSP)	4,370,000	2,986.54
	Sub - Total	**10,430,000**	**7,128.07**
B	**Resettlement Implementation Cost**		

SN	Item	Amount	
	Cost for Psychosocial Support Officer/Case Worker (6 Months period) – Lump Sum	1,800,000.00	1,230.16
	Capacity Building & Training/institutional strengthening including training for traders	8,000,000.00	5,467.36
	GRM Management/Implementation	2,000,000.00	1,366.84
	Consultations and Monitoring	1,800,000.00	1,230.16
	Disclosure	2,000,000.00	1,366.84
	Sub-Total	**15,600,000.00**	**10,661.35**
	Contingency (10% of RAP compensation cost (A))	1,043,000.00	712.81
	GRAND TOTAL	**27,073,000.00**	**18,502.22**

USD 1 = NGN 1,463.23[1] as at 15th October, 2025. This exchange rate may change before implementation

[1] www.ngnrates.com

CHAPTER 1: INTRODUCTION

1.1 Background

The Nigeria Improved Child Survival Program for Human Capital MPA, implemented by the Federal Ministry of Health and the National Primary Health Care Development Agency (NPHCDA), aims to reduce under-five mortality through improved immunization and malaria services. The Project Development Objective (PDO) of the first phase (IMPACT) is to improve the utilization and quality of immunization plus and malaria services in selected states.

The IMPACT Project is implemented by the National Primary Health Care Development Agency (NPHCDA) and the National Malaria Elimination Program (NMEP) with the PDO of the first phase (IMPACT) of the Multiphase Programmatic Approach (MPA), which is to improve the utilization and quality of immunization plus and malaria services in selected states. Immunization plus services refer to the provision of immunization, maternal, child, and neonatal services in selected states.

> ***Project Development Objective (PDO)***
> The PDO of the first phase (IMPACT) of the MPA is to improve the utilization and quality of immunization plus and malaria services in selected states. Immunization plus services refer to provision of immunization, maternal, child, and neonatal services in selected states.

The PDO builds on objectives in the National Strategy for Immunization and Primary Health Care System Strengthening, the National Malaria Strategic Plan, and the overarching RMNCAH-Malaria Integration Strategy currently being rolled out by the FMoH & SW. The overall objective of the program is to reduce under-five mortality rate in program areas.

Project Components

The IMPACT Project has the following components

Component 1: Malaria Control
Component 2: Immunization Plus
Component 3: Knowledge for Change
Component 4: Contingent Emergency Response Component (CERC)

As part of component 2 activities under the immunization plus, the IMPACT project has received support from the World Bank for the rehabilitation and construction of 2,625 PHCs to meet BEmONC standards and align with Level 2 Primary Healthcare Centers (PHCs) requirements of the Federal Ministry of Health across 28 participating states of Abia, Adamawa, Bauchi, Benue, Borno, Cross river, Delta, Ebonyi, Edo, Ekiti, Gombe, Imo, Jigawa, Kaduna, Kano, Kogi, Kwara, Lagos, Nasarawa, Ogun, Ondo, Oyo, Plateau, Rivers, Sokoto, Taraba, Yobe and Zamfara States. An additional 450 PHCs in Kebbi, Niger, and the FCT will be rehabilitated within the coming months. Over 50% of the rehabilitation of the construction works has been completed in many states, targeting a June 2025 completion. Upgrades include structural improvements, power, water supply, and equipment.

The project is currently experiencing implementation challenges arising from emerging social issues across fifteen (15) states. These include instances of unanticipated land acquisition activities affecting fifty-three (53) Primary Health Centres (PHCs), which may have social implications not originally anticipated under the provisions of the World Bank's Operational Policy (OP) 4.12 on Involuntary Resettlement.

The proposed project works will involve various civil engineering activities such as site clearing, equipment mobilization, topsoil removal, earthworks, excavation, construction, and rehabilitation of facilities, as well as the drilling of boreholes, among others.

Accordingly, this Resettlement Action Plan (RAP) has been developed to provide a comprehensive assessment of the potential impacts of these activities on livelihoods and involuntary resettlement. It

further proposes measures to avoid, minimize, or mitigate adverse impacts and to ensure that affected persons are adequately compensated and assisted in line with the principles of the World Bank OP 4.12.

1.2 Aim and Objectives of the RAP

The aim of this RAP is to identify all Project Affected Persons (PAPs) and Project Affected Households (PAHs), and to outline procedures and measures that the State Project Implementation Units (SPIUs) will follow to mitigate adverse impacts on livelihoods. The RAP also defines the eligibility criteria for compensation, valuation of affected assets, and the grievance redress process.

The key objectives are to:

- Assess the potential resettlement impacts of the proposed upgrade works;
- Describe the procedures to mitigate adverse impacts and compensate for residual losses;
- Define eligibility criteria and valuation methods for PAPs/PAHs;
- Outline the grievance redress mechanism and institutional responsibilities.

1.3 Justification for the preparation of RAP

The intervention civil works are anticipated to cause involuntary resettlement impacts, resulting in physical and/or economic displacement, both temporary and permanent. These impacts will directly affect assets and livelihoods of people around the project corridors. In line with World Bank OP/BP 4.12 on Involuntary Resettlement, the preparation of a Resettlement Action Plan (RAP) is therefore required to identify, assess, and mitigate these impacts. The RAP provides a framework to compensate affected persons, restore livelihoods, and ensure that project benefits are equitably shared.

1.4 RAP Methodology

This Resettlement Action Plan (RAP) has been prepared following a stepwise approach designed to meet the defined scope of work and objectives outlined in the Terms of Reference (TOR). The Consultant undertook the following steps and approaches:

1. Literature Review:
The Consultant's team meticulously reviewed all pertinent documents. This exercise was instrumental in elucidating the correlations and disparities between the World Bank's policy frameworks and the laws and policies governing involuntary displacement within the country. Additionally, it facilitated a comprehensive understanding of the civil works and method of land acquisition for the project. From this review of the aforementioned policy documents, the necessary prerequisites for the RAP were ascertained.

2. Initial/Reconnaissance Site Visit and Stakeholder Consultation:
This approach was imperative for assessing the extent and nature of the expected impacts, identifying the PAPs, and engaging with community leaderships and associations to which potential PAPs/PAHs belong and were conducted for all the 53 PHCs across the affected15 States.

3. Engagement and Training of Field Officers/Enumerators:

Field officers/enumerators were selected locally from all the 15 states, the field officers were trained using Android devices and the Kobo toolbox application for socioeconomics survey. Mock exercises were conducted to assess their understanding and capabilities before their deployment to the field.

4. Consultation with Affected Communities and PAPs:
Throughout the RAP preparation process, consultations were conducted. The Consultant engaged with various stakeholders, including Traditional Rulers, Ward Development Council Chairman, Project Affected Persons (PAPs) where applicable, and other community members. This engagement aimed to disseminate information about the exercise and to extend invitations to stakeholders and project-affected persons for consultations.

5. Socioeconomic Assessment of PAPs and PAHs

As part of the census of PAPs and PAHs conducted to determine the number of PAPs, number of affected assets, and types of impact, a detailed socioeconomic assessment of the project affected persons and project affected households was conducted using developed questionnaires administered to 15 PAPs

identified in 4 states out of the 15 states. Data collection was done using electronic means on Kobo toolbox.

6. Establishment of Legal and Institutional Arrangements for the RAP

An analysis of the legal and institutional arrangements in Nigeria and the project states was conducted to establish the scope of existing land and property laws governing state-owned lands, and the identification of the relevant laws (including customary and traditional law) governing land tenure, valuation of assets, compensation, and natural resource. Gaps between the local laws and provisions and the World Bank's resettlement framework were highlighted. Mechanisms for addressing the identified gaps were highlighted.

Furthermore, institutions including agencies, civil societies, and community-based organizations with roles to play in the implementation of resettlement activities were identified. Measures for strengthening institutional capacities for the RAP implementation and monitoring were presented.

7. Implementation arrangements for RAP

The RAP assessment identified institutional responsibilities for implementation of the RAP, highlighting institutional implementation responsibilities, monitoring responsibilities, monitoring parameters, and procedures for the grievance redress. In addition, an implementation time plan for the RAP was developed.

1.5 Description of Construction Works

A total of 53 PHCs were assessed with various civil works including expansion of existing PHCs, construction of bungalow type staff quarters, perimeter fencing, new construction, demolition and reconstruction of existing PHCs construction of security posts, boreholes, and installation of solar systems carried out. This includes 21 PHCs with expansion of the existing PHCs, 39 PHCs with staff quarters construction, 24 perimeter fencing, 2 new construction, 5 security posts, 7 borehole, and 5 solar system installation across the various PHCs. This is presented in the table below.

Table 1: PHC Improvement Works

State	LGA	Name of PHC	Description of Improvement works				
			Expansion of PHC (Main building)	***Staff quarters***	***Fencing***	***New construction***	***Others***
Abia	Ukwa West	Obokwe PHC	✓	✓	✓	-	-
	Ugwunagbo LGA	Abayi Nchokoro Ward PHC	✓	✓	-	-	-
	Isialangwa South	Omoba Ward PHC	✓	✓	✓	✓	-
Bauchi	Alkaleri	Bajama PHC	-	✓	-	-	-
	Ganjuwa	Dabe PHC	-	✓	✓	-	-
	Jama'are	Under five PHC	-	✓	✓	-	-
	Misau	Jarman PHC	-	✓	✓	-	-
Benue	Obi	Ameka PHC	✓	✓	✓	-	Security post; borehole
	Okpokwu	Ikomija PHC	✓	✓	✓	-	-
	Ado	Odebo-Ojenyo PHC	-	✓	✓	-	-
Cross-River	Calabar South	Edgerly PHC	✓	✓	-	-	-
	Odukpani	Usung Esuk PHC	✓	✓	-	-	-
Ebonyi	Ezza South	Amajim MDGs	✓	✓	-	-	-
	Afikpo South	Ekoli PHC	✓	✓	-	-	-
	Ohaukwu	Ekwashi MDGs	✓	✓	-	-	-
	Ishielu	Iduma PHC	✓	✓	-	-	-
	Izzi	Onunwaku PHC	✓	✓	-	-	-
	Onicha	Okaria MDGs	✓	✓	-	-	-
Edo	Ovia Southwest	Essi PHC	-	✓	✓	-	-
Ekiti	Ekiti East	Iludofin	-	✓	✓	-	Security house
Kogi	Dekina	Iyale PHC	✓	✓	-	-	Security house
	Kogi	Achara PHC	✓	-	-	-	-
	Lokoja	Angwan Yashi	-	-	-	-	-
	Mopa/Moro	Odole PHC	✓	✓	-	-	-

State	LGA	Name of PHC	Description of Improvement works				
			Expansion of PHC (Main building)	***Staff quarters***	***Fencing***	***New construction***	***Others***
	Ofu	Onichaigo	✓	✓		-	-
Kwara	Offa	Aisha Oloyede PHC	✓	✓	✓	-	Security House
	Ilorin South	Isale Asa PHC	-	✓	✓	-	Security house
Nasarawa	Keana	Aloshi PHC	-	-	-	✓	-
	Nasarawa	Unguwar Malan PHC	-	✓	-	-	-
	Nasarawa Eggon	Akpata PHC	✓	✓	✓	-	-
	Nasarawa Eggon	Lambaga PHC	-	✓	✓	-	-
	Toto	Nakuse PHC	-	✓	✓	-	-
	Wamba	Chugba PHC	-	-	-	-	-
Ondo	Ondo East	Owena Bridge PHC	-		-	-	-
	Ilaje	Ayetoro PHC	-	✓	-	-	-
Oyo	Akinyele	Ojoo PHC	-	-	✓	-	Borehole
	Irepo	Ajangba PHC	✓	✓	✓	-	Borehole and Solar system
	Iwajowa	Ajimati PHC	-	✓	✓	-	Borehole and Solar system
	Iwajowa	Ayede Ikia PHC	-	✓	✓	-	Borehole and Solar system
	Kajola	Ayetoro Oke PHC	-	✓	✓	-	Borehole and Solar system
	Iwajowa	Sabiganna	✓	✓	✓	-	Borehole and Solar system
Plateau	Jos North	BHCPF Clinic, Jos Jarawa	-	-	✓	-	-
Taraba	Kurmi	Mutum-Daya PHC	-	-	-	✓	-
	Donga	Gidan Maimagani/ Fada Ward PHC	-	✓	-	-	-
	Donga	Gyatta Aure PHC	-	✓	-	-	-
	Ibbi	Ungwar Dampar PHC	-	✓	✓	-	-
	Wukari	Pwadzu PHC	-	✓	✓	-	-
Yobe	Potiskum	Mamudo PHC	-	✓	✓	-	-

CHAPTER 2: DESCRIPTION OF THE PROJECT ENVIRONMENT AND BASELINE STUDIES

2.1 Description of the project State

The four states of Benue, Nasarawa, Oyo, and Taraba, where Project Affected Persons (PAPs) were identified, are spread across Nigeria's North-Central, South-West, and North-East regions, each with distinct geographical and socioeconomic characteristics relevant to the IMPACT Project. These states are largely agrarian, comprising rural and semi-urban settlements whose livelihoods depend primarily on land-based activities such as crop farming, livestock rearing, and petty trading.

In Benue State (Obi and Ado LGAs), the project sites lie within fertile agricultural zones where farming and local trade form the economic backbone of communities. Land acquisition for Primary Health Centre (PHC) rehabilitation and expansion affected small portions of community land and minor structures, temporarily disrupting some livelihood activities. However, the resettlement interventions are designed to ensure that such impacts do not erode household incomes but rather enhance overall well-being through equitable compensation and improved access to healthcare services.

In Nasarawa State (Nasarawa **LGA**), PAP was identified in the community that exhibit both rural and semi-urban characteristics. The terrain is hilly, and agriculture remains the dominant economic activity. Infrastructure and healthcare services are limited, contributing to health indicators that fall below the national average. The IMPACT Project's interventions in these areas aim to mitigate temporary livelihood disruptions and strengthen local health systems, particularly in maternal and child healthcare.

Further south in Oyo State (Akinyele and Iwajowa LGAs), socioeconomic conditions vary between peri-urban and rural contexts. Akinyele, located on the outskirts of Ibadan, combines agricultural and commercial activities, while Iwajowa, in the northern part of the state, is predominantly rural with limited infrastructure. PAPs in these areas experienced minor economic disruptions due to land acquisition for PHC improvements. Nevertheless, the project's benefits are significant—enhancing healthcare access, improving community health outcomes, and supporting livelihood restoration.

In Taraba State (Wukari LGA), situated along the Benue River basin, communities are engaged in extensive farming and trade activities that link the North-Central and North-East regions. The project's interventions in Wukari involved minimal land take, with potential short-term effects on local livelihoods. However, by strengthening the PHC network and improving access to essential services, the project contributes to sustainable development outcomes in the state.

Overall, across the four states, the IMPACT Project seeks to balance short-term livelihood adjustments with long-term social and health benefits, consistent with the principles of the World Bank's Operational Policy (OP) 4.12 on Involuntary Resettlement. The RAP assessment were carried out in 15 participating states and 49 LGAs, as shown in the map below.

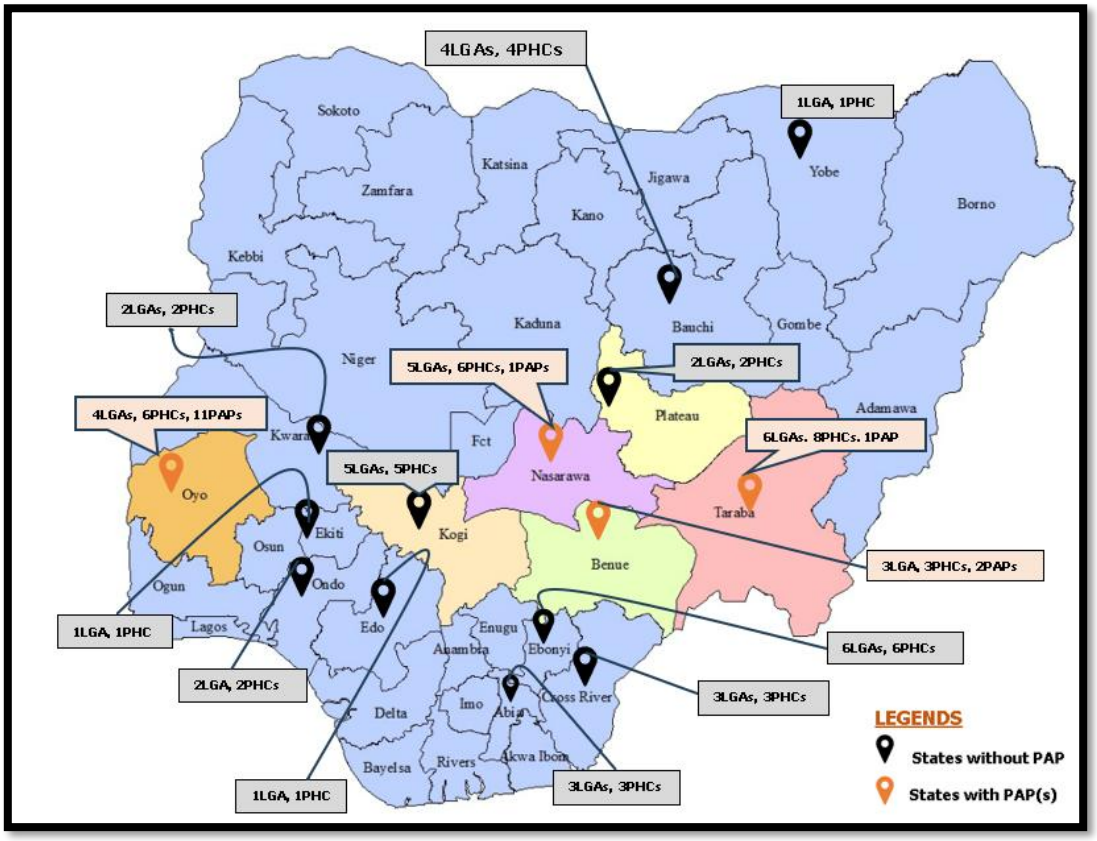


Figure 1: Map of Nigeria showing States where RAP Was Conducted

2.2.2 General Socioeconomic description of the project location

The socioeconomic analysis of the project area involved consultations with stakeholders, field observations, desk reviews, and key informant interviews across affected communities. The findings highlight the demographic, social, economic, and cultural characteristics of communities in the identified project states and LGAs. This description provides a general understanding of the context in which Project Affected Persons (PAPs) live, and the baseline against which the impacts of the project and corresponding mitigation measures can be assessed.

Demographic Structure of the Community: The project areas comprise both rural and semi-urban settlements, with population densities varying across the different states. Household sizes range from 5 to 8 persons, with a youthful population structure dominated by children and young adults under 35 years. Women constitute a significant proportion of the population, many of whom are actively engaged in agriculture, petty trading, and household management. The population is characterized by ethnic diversity, reflecting Nigeria's multi-ethnic composition. Migration patterns indicate that most residents are long-term settlers with strong ancestral ties to their land, while temporary migrants participate seasonally in farming and trade activities.

Leadership Patterns and Political Process: Leadership in the communities is based on traditional, religious, and elected systems. The traditional institutions, led by Chiefs, District Heads, and Village Heads, play critical roles in community governance, dispute resolution, and mobilization for development initiatives. These traditional leaders are well respected and often serve as intermediaries between the government and the people. The political process is largely participatory, with local government councils serving as the main link to state and federal governance structures. Community-based organizations (CBOs) and Ward Development Committees (WDCs) also play vital roles in health facility oversight, social mobilization, and project sustainability.

Family Structure: The family system in the project areas is predominantly extended, with strong kinship ties and communal interdependence. Families often live in clustered compounds, and household

heads, typically male, are responsible for major decisions regarding land use, livelihoods, and community participation. Women, while central to household welfare and economic support, often have limited decision-making power in public matters. Children contribute to household labour, especially in farming and domestic chores. However, modern influences and education are gradually promoting nuclear family arrangements, especially in semi-urban and educated households.

Services Available in or near the Community: Access to basic social amenities across the project areas remains limited. While some communities are connected to the national grid, electricity supply is often irregular. Water supply is derived from hand-dug wells, boreholes, streams, and in some cases, small water schemes. Road networks linking PHCs and communities are mostly laterite and become difficult to access during the rainy season. Educational facilities exist at the primary and junior secondary levels, but many lack adequate infrastructure and teaching materials. Health services are mainly provided through Primary Health Centres (PHCs), which before the project intervention were poorly equipped and understaffed. The ongoing rehabilitation and upgrade under the IMPACT Project are expected to significantly improve healthcare delivery, particularly for women and children.

Important Local Customs and Festivals: Cultural identity remains strong in all project locations. Each community celebrates unique traditional festivals, such as harvest festivals, new yam festivals, and cultural days that strengthen communal unity. Religious practices are mainly Christian and Islamic, with elements of traditional worship still present. Customs surrounding birth, marriage, and death are guided by long-standing traditions. These events often serve as avenues for social interaction, information exchange, and community solidarity. The respect for cultural practices and traditions is critical for community acceptance of development projects and must be considered during RAP implementation and community engagement.

Primary Forms of Livelihood: Agriculture is the dominant source of livelihood across the project locations. Households depend primarily on subsistence farming of crops such as yam, cassava, maize, millet, rice, and vegetables. In lowland and riverine areas, fishing and irrigation farming are also common. Other livelihood activities include petty trading, artisanship, food processing, and civil service employment in semi-urban centers. Women are active in food vending, weaving, and small-scale trading, contributing significantly to household income. However, seasonal variations, land availability, and limited access to credit and inputs affect productivity. The temporary land acquisition for PHC rehabilitation has minor impacts on livelihoods, necessitating mitigation through livelihood restoration measures.

Land Tenure System of Affected Communities/Lands: Land ownership across the project communities is governed by a mix of customary and statutory tenure systems. Customary ownership is predominant, where land is communally held and allocated by family heads or community leaders for residential, agricultural, or public purposes. Land sales or transfers are often verbal or based on witness agreements rather than formal documentation. The introduction of government projects, such as the IMPACT PHC rehabilitation, usually requires community consent through traditional authorities. Although the land take for this project was minimal, it triggered resettlement considerations due to its social and economic implications. The RAP therefore ensures that all affected persons are adequately compensated in line with World Bank OP 4.12 and Nigerian laws.

Social Conflicts and Poverty: The level of social cohesion within the communities is generally strong, characterized by inter-family cooperation and communal labor during farming seasons. However, poverty levels remain high, largely due to limited income-generating opportunities, inadequate infrastructure, and dependence on rain-fed agriculture. Occasional conflicts arise over land boundaries, chieftaincy succession, and political affiliations, but these are often managed through traditional conflict resolution mechanisms. The communities are generally peaceful and receptive to development interventions. Poverty remains multidimensional, with high vulnerability among women, youths, and persons with disabilities.

Gender-Based Violence (GBV): Gender-Based Violence (GBV) is an emerging concern in many of the project communities, exacerbated by socio-economic pressures, gender inequality, and cultural norms that limit women's empowerment. Reported cases of intimate partner violence, sexual harassment, and economic deprivation exist, though often underreported due to stigma and weak institutional response mechanisms. During the RAP preparation, awareness on GBV prevention and

referral mechanisms was incorporated into stakeholder engagements. The project integrates GBV risk mitigation measures, including community sensitization, establishment of grievance redress channels for survivors, and linkage with existing state-level GBV response systems, to ensure that women, girls, and other vulnerable groups are protected throughout project implementation.

Health Status: The overall health status of communities across the project areas reflects the typical challenges of rural and peri-urban Nigeria, characterized by limited access to quality healthcare services, inadequate facilities, and shortage of skilled medical personnel. Common health issues reported during field consultations include malaria, typhoid fever, upper respiratory tract infections, diarrheal diseases, and maternal and neonatal complications arising from poor antenatal attendance and unskilled delivery practices. Malaria remains the most prevalent disease, contributing significantly to morbidity and mortality, particularly among children under five and pregnant women.

Most of the Primary Health Centres (PHCs) in the project areas were found to be under-resourced, some facilities operate without consistent power or water supply, limiting their capacity to provide continuous services. Referral systems are weak, and communities often travel long distances to secondary or tertiary hospitals for specialized care. Immunization coverage, though improving, remains inconsistent due to logistical challenges and community awareness gaps.

The rehabilitation and upgrade of PHCs under the IMPACT Project are therefore crucial to improving health outcomes in the affected communities. The interventions will enhance the delivery of maternal, neonatal, and child health services, strengthen disease surveillance, and improve access to essential medicines and emergency obstetric care. By addressing infrastructure and capacity gaps, the project will contribute significantly to reducing preventable illnesses, maternal and infant mortality, and overall health vulnerability within the project areas.

2.3 Socioeconomic Baseline Conditions of Project Affected Persons (PAPs)

A socioeconomic survey was conducted among the 15 Project Affected Persons (PAPs) through interviews administered in their preferred language. All 15 PAPs were successfully surveyed and their assets inventoried. Community heads and members assisted in identifying the PAPs and verifying their details.

2.3.1 Rationale for Choice of Socioeconomic Parameters

The socioeconomic parameters included in the socioeconomic analysis conducted as part of this RAP were selected based on their significance in decision-making during the execution of the required resettlement measures and other project-related activities. The rationale for the inclusion of the parameters is presented in the Table below.

Table 2: Socioeconomic survey Parameters

SN	Socioeconomic Variable	Rationale for Inclusion
1	Gender of PAPs	Gender affects the participation of affected persons in activities carried out during RAP implementation due to prevailing gender norms in the project environment. An understanding of the gender distribution of affected persons will help RAP implementers in focusing planned assistance and other gender-sensitive operations during RAP implementation. This will include consideration for married women who possess identity documents in their maiden names, access of women with limited inheritance rights to resettlement entitlements etc
3	Religion	Religious inclinations of PAPs might affect their participation in activities implemented during the course of RAP implementation.
4	Occupation	Occupation, indicating the livelihood source of the PAPs are an overly critical aspect that is affected by displacement of people. It is important to have an understanding of the means of livelihood of affected persons before the proposed activities commence so as to factor that understanding into decisions and choices to be made particularly for PAPs who will require livelihood support as part of the resettlement measures to be implemented.
5	Age	The age distribution of PAPs is required to understand how compensation/resettlement entitlements will be targeted and delivered to effectively address age-related conditions of individual PAPs. For instance, elderly PAPs who are not economically active will require additional assistance while younger PAPs can be targeted with more livelihood enhancement opportunities and project benefits such as jobs, small supply contracts etc.

SN	Socioeconomic Variable	Rationale for Inclusion
6	Marital Status	More flexible delivery arrangements based on marital status will need to be implemented. Married women will require more sensitive considerations in the scheduling of meetings which will be conducted during RAP implementation. Additional consideration will also be required for married women who still use identity documents with their maiden names. Divorced or separated people, and widows will also need to be specially consulted to ensure that they are not disproportionately impacted if their entire households will need to relocate during resettlement operations.
7	Educational Status	The educational status of PAPs is a very important indicator in their eventual socioeconomic outcomes when all resettlement operations are completed. The educational status of PAPs will typically influence their understanding of compensation offers, participation in resettlement (and other project) benefits. Hence, special considerations will have to be given to PAPs who might not be literate as they may not understand the contents of agreements.
8	Average Income	The average income of PAPs before displacement is required to determine the magnitude of income losses for economically displaced persons that will need to be restored.

2.3.2 Analysis of Socioeconomic Profile of PAPs

The socioeconomic survey conducted for PAPs identified cuts across 7 LGAs including 2 PHCs in Benue State - Ameka PHC and Odebo PHC, 1 PHC in Nasarawa State – Angwan Mallam PHC, 3 PHCs in Oyo State - Ojoo PHC, Ajimoti PHC, and Ayede Ikia PHC, and 1 PHC in Taraba State - Pwazu PHC. The total number of identified PAPs (15), comprises of 8 female, and 7 male, 4 are elderly persons (above 60 years) with limited means to support themselves to recover from the project's adverse social impact. 8 have large households comprising dependents, who may be secondary PAPs due to affected livelihoods of the PAPs. A detailed register of each PAP is presented in Annex 2.

The table 3 below presents the analysis of the socioeconomic assessment conducted for all the PAPs identified across the 8 PHCs.

Table 3: Socioeconomic Survey Result of PAPs

Variable/PHC	PHC Ameka (Benue)	PHC Odebo (Benue)	PHC Angwan Mallam (Nasarawa)	PHC Ojoo (Oyo)	PHC Ajimoti (Oyo)	PHC Ayede Ikia (Oyo)	Pwazu PHC (Taraba)	Inferences/Implications
Number of PAPs	**1**	**1**	**1**	**8**	**2**	**1**	**1**	
Sex (Male/Female)	100% M	100% F	100% M	37% M / 63% F	50% M / 50% F	100% M	100% F	PHCs show varied land acquisition impact; some are dominated by male PAPs (PHC Ameka), while others have higher female representation (PHC Odebo, Ojoo). This suggests gendered roles in land ownership, impact, and vulnerability.
Age Group	Elderly (60 yrs)	Middle-aged (52 yrs)	Middle-aged (56 yrs)	Broad Mix (28–65 yrs: 8% Youth, 58% Middle-aged, 34% Elderly)	56 yrs (Middle-aged), 80 yrs (Elderly)	Elderly (65 yrs)	Youth (36 yrs)	The socioeconomic analysis of PAPs across PHCs shows that the majority are either middle-aged (36–59 years) or elderly (60+), with elderly PAPs dominating in Ameka, Ayeda Ikia, and Ajimoti, while middle-aged groups are concentrated in Ojoo, Ajimoti. Youths (18–35 years) are scarcely represented, appearing only in Odebo (33%) and Pwazu (100%), reflecting limited youth are impacted.
Marital Status	Married 100%	Widow 100%,	Married 100%	50% Married, 50% Widow	50% Widow, 50% Married	Married 100%	Married 100%	Majority are married across PHCs, with widows prominent in some (Odebo, Ojoo, Ajimoti). Widows may require special livelihood or vulnerability support, due to the impact of the land acquisition.
Family Size	Large (8+)	Large	Large (8 and Above)	Mix: Small–Large	Large	Large (8+)	Medium (5–7)	Most PAPs have large/extended families, which increases the social impact of land acquisition. Compensation/resettlement must consider household dependency.
Education	Tertiary	None	Secondary	Mixed (Primary, Sec, Tertiary)	None & Secondary	Tertiary	Secondary	Literacy levels vary among the PAPs, some PHCs locations show high tertiary education (Ameka, Ojoo), while others are dominated by none/primary (Odebo). This affects livelihood options and adaptation to project impacts.
Primary Occupation	Civil Servant	Farming	Farming	Trader (majority)	Farming & Artisan	Others/Religious	Trader	Farming and trading dominate, with civil service roles in urban PHCs (Ameka). Loss of land directly threatens food security for farming-dependent communities. .
Secondary Occupation	Farming	Business	None	Nil / Artisan	Farming	Farming	Farming	
Monthly Income Range	~~₦~~50k–~~₦~~100k	~~₦~~30–~~₦~~50k	~~₦~~100k–~~₦~~200k	~~₦~~50k–~~₦~~200k+	~~₦~~50k–~~₦~~100k	~~₦~~100k–~~₦~~200k	~~₦~~30k–~~₦~~50k	Income Levels range from low (<~~₦~~30k) to high (>~~₦~~200k). Communities with lower income PAPs (Odebo, Pwazu) are more vulnerable to land acquisition shocks
Persons with Disability	None	None	None	None	None	None	None	There was no person with disability recorded during the assessment, but inclusive planning is still necessary.
Perception of Project	Positive (life improvement)	Positive (closer healthcare)	Neutral (farming focus)	Very Positive (development)	Positive (happy)	Positive (community devt)	Mixed (loss of farm, but supportive)	Largely positive across PHCs, most PAPs perceive the health facility project as beneficial, even where displacement occurs. This indicates strong community support, which is favorable for smooth project implementation.

2.3.3 Vulnerability Criteria and Vulnerable Persons Identified

Under the context of this Resettlement Action Planning, vulnerable persons are defined as people who are by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage or social status - more adversely affected by resettlement than others; and who may have limited ability to claim or take advantage of resettlement assistance and related development benefits. In this RAP, the following vulnerability conditions were determined. A total of 10 vulnerable PAPs (5 males and 5 females) were identified: 60 years above (4), widows/female heads of household (5), large households (8), 60 years above and large households (4), 60 years above and widows/female heads of household (2), and widows/female heads of household and large households (2).

The criteria for vulnerability is defined in Table below. Criteria for vulnerability assessment used included (i) Elderly PAPs (>60 years); and (ii) vulnerable large household size (iii) Widow -Female head of household.

Table 4: Description of Vulnerability Criteria

No	Vulnerability Criteria	Number of PAPs	Description and Considerations
1.	Elderly persons	4	PAPs who are 60 years and above may not be able to easily gain restoration of their livelihoods without support. Such groups may require additional support to gain restoration of their livelihoods. Also, where the impact is not properly managed, this may cause shock to the PAP which may linger. The socioeconomic analysis of the PAPs reveals that 4 PAPs are 60 years and above. (Refer to Annex 2 – PAPs Register for PAPs details).
	Large Household Size	8	In designing the household sizes during the assessment, factors considered include the number of dependents, number of wives, number of income earners, household income, and family pattern. Impacts on project affected persons (who are mostly heads of households) may have ripple (secondary) direct or indirect effects on their households. While all PAPs are taken into consideration for secondary impacts on their households, more consideration is given for PAPs with large households whose conditions as described may increase their vulnerability to project impacts.
2.	Widow/Women Head of Household	5	Typically, women who are widows and head of household with low income.

CHAPTER 3: POLICY LEGAL AND REGULATORY FRAMEWORK

3.1 Introduction

It is imperative to analyze the laws and regulations relevant to this project. This will help in understanding the legalities and procedures in implementing the project and identifying gaps that need to be addressed to comply with the World Bank's OP 4.12 Policy on involuntary resettlement and the national legislation. The following subsections summarize the policy, legislative and institutional framework in which the projects shall be implemented concerning social issues as well as World Bank policy on resettlement & rehabilitation.

3.2 Relevant Nigeria Acts and Legislation

3.2.1 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:

(a) requires the prompt payment of compensation therefore, and
(b) 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.

3.2.2 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 in this section.

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. 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.

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.

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:

- **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.
- **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.
- **Crops:** An amount equal to the value as prescribed and determined by the appropriate officer

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 entitled to compensation.

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).

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).

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).

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.

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.

Payment of such compensation to the holder and the occupier as suggested by the Act is confusing. Does it refer to holder in physical occupation of the land or two different persons entitled to compensation perhaps in equal shares? The correct view appears to follow from the general tenor of the Act. First, the presumption is more likely to be the owner of such unexhausted improvements. Secondly, the provision of section 6 (5) of the Act, which makes compensation payable to the holder and the occupier according to their respective interests, gives a pre-emptory directive as to who shall be entitled to what.

Again, the Act provides in section 30 that where there arises any dispute as to the amount of compensation calculated in accordance with the provisions of section 29, such dispute shall be referred to the appropriate Land Use and Allocation Committee. It is clear from section 47 (2) of the Act that no further appeal will lie from the decision of such a committee. If this is so, then the provision is not only retrospective but also conflicts with the fundamental principle of natural justice, which requires that a person shall not be a judge in his own cause. The Act must, in making this provision, have proceeded on the basis that the committee is a distinct body quite different from the Governor or the Local Government. It is submitted, however, that it will be difficult to persuade the public that this is so since the members of the committee are all appointees of the Governor.

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:

- 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.
- 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 each 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.
- 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.

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.

3.2.3 State Urban Planning and Development Board (Amendment) Law (2011)

The State Urban Planning and Development Board (Amendment) Law (2011), as adopted and domesticated in several Nigerian states including Benue, Kogi, Nasarawa, Oyo, Plateau, and Taraba, provides the legal framework for coordinated urban development, land use control, and physical planning at state and local government levels. The law empowers the respective State Urban Planning and Development Boards to prepare, approve, and implement physical development plans, regulate building standards, and ensure that public infrastructure projects, including health facilities, conform to approved layouts and environmental standards. In the context of the IMPACT Project, the law is relevant to the siting, rehabilitation, and

expansion of Primary Health Centres (PHCs), ensuring compliance with spatial planning regulations, safety standards, and orderly land use. It also mandates prior development approval and promotes sustainable urban growth consistent with public health and environmental protection objectives.

3.2.4 Forestry Act

This Act of 1958 provides for the preservation of forests and the setting up of forest reserves. It is an offence, punishable with up to 6 months' imprisonment, to cut down trees over 2 ft (0.6m) in girth or to set fire to the forest except under special circumstances. Nigeria is at present a wood deficit nation. To ameliorate the situation, the policy on forest resources management and sustainable use is aimed at achieving self-sufficiency in all aspects of forest production using sound forest management techniques as well as the mobilization of human and material resources. The overall objectives of forest policy are to prevent further deforestation and to recreate forest cover, either for productive or for protective purposes, on already deforested fragile land.

Specifically, the National Agricultural Policy of 1988 in which the Forestry Policy is subsumed, provides for:

- Consolidation and expansion of the forest estate in Nigeria and its management for sustained yield.
- Regeneration of the forests at rates higher than exploitation.
- Conservation and protection of the environment viz: forest, soil, water, flora, fauna, and the protection of the forest resources from fires, cattle grazers and illegal encroachment.
- Development of Forestry industry through the harvesting and utilization of timber, its derivatives, and the reduction of wastes.
- Wildlife conservation, management and development through the creation and effective management of national parks, game reserves, tourist, and recreational facilities, etc.

3.2.5 National Gender Policy

The policy seeks to promote gender equality and eliminate discrimination based on gender, ethnicity, religious beliefs, etc. The key policy areas are focused around 5 critical areas:

i. Culture re-orientation and sensitization to change gender perceptions and stereotypes.
ii. Promotion of women's human rights and in particular focusing on sexual and gender-based violence (SGBV) and in supporting new legislation and legal rights of women.
iii. Promoting the empowerment of women and integrating gender within key sectors as highlighted within the NGP – (Agriculture/Rural Development; Environment/Natural Resource; Gender and HIV/AIDS; Health and Reproductive Health/Rights; Education/Training; Labour/Employment);
iv. Women's political participation and engendered governance including gender and conflict management; and
v. Supporting institutional development including the use of ICT and building strategic partnerships, including identifying new partnerships with men's organizations, faith-based organizations and traditional institutions.

3.3 Relevant Administrative Framework

3.3.1 State Level

3.3.1.2 State Ministry of Lands and Survey

The relevant state ministry regarding land is the State Ministry of Lands and Survey. Some of the functions of the State Ministry of Lands and Survey related to this RAP include taking up responsibility for all forms of land policies within the state. It gives advice to the government on land tenure issues and manages government land and properties. The Ministry is also tasked with administrative rights to land use decree, urban development, city, and town rejuvenation as well as environmental protection.

3.3.2 Local Government Authorities

The 49 LGAs across the 15 states also have roles in the administration of lands in rural areas and hence, will be involved in the resettlement process, especially in the allocation and control of customary land, regulation of traditional land ownership practices, land dispute resolution, local land use and development control, etc.

3.4 Gap Analysis of the Nigeria Land Use Act and the World Bank's Operational Policy (OP4.12) on Involuntary Resettlement

In this section, a comparison made between the World Bank policies (OP4.12) and the Nigerian Land Use Act. Whereas the law relating to land administration in Nigeria is wide and varied, entitlements for payment of compensation are essentially based on right of ownership. The Bank's OP4.12 is fundamentally different from this and states that affected persons are entitled to some form of compensation whether or not they have legal title if they occupy the land by an announced cut -off date.

The Nigeria Land Use Act and World Bank Safeguards Policy OP/BP 4.12 agree that compensation should be given to PAPs in the event of land acquisition and displacement of persons prior to the commencement of works. Thus, all land to be acquired by the government for this project will be so acquired subject to the Laws of Nigeria and the Bank OP4.12. The results of the gap analysis are presented in Table 5.

Table 5: Gap Analysis: Requirements of Land Use Act compared to WB OP 4.12

Theme	Local Legal Framework/Policy	WB OP 4.12 requirements	Measures to address Conflict/gap
Minimization of Resettlement	There are no provisions on the need to minimize or avoid resettlement	Requires that project designers should apply the mitigation hierarchy – avoidance, minimization and compensation - during the preparation of projects	All project sites will be assisted to consider the possibility of avoiding or minimizing impacts before designs are finalized
Extent of Coverage of Compensation and Resettlement Assistance	Compensation does not cover the actual cost of land. Only the cost of all *unexhausted developments* is covered. Payment for compensating loss of developments is at *depreciated market value.* For persons with statutory title under the LUA, compensation will also be paid for rental for the year during which the title was revoked	Recommends land-for-land compensation. Other compensation is at Full *(undepreciated)* 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 also be paid as part of the compensation plan. Requires payment of compensation for land to persons with formal titles and other recognized claims on land	Eligible PAPs (based on OP 4.12 eligibility categories) will be compensated on replacement cost. Full Replacement Cost will be independently determined and paid All costs of keeping the land productive that has been incurred by affected persons will be included in the compensation offer.
Eligibility	Recognizes persons who obtain rights under the LUA and others who held titles under the previous tenure arrangements prior to the LUA subject to such rights being recognized through the transitional arrangements set up under the act	Eligible persons for compensation and resettlement assistance are (i) all holders of formal titles to land (ii) persons without formal titles but with claims to ownership and use of such land which is recognized in the project area and (iii) persons without any title or claim for assistance under the RAP to be prepared	The project will adopt the three eligibility categories established under the OP 4.12 for compensation and resettlement assistance. PAPs in the third category will only be provided with resettlement assistance and are not eligible for any form of compensation for land
Timing of Compensation	Allows the government to acquire land compulsorily and make compensation due for acquired assets anytime	Requires that all payments for compensation and resettlement assistance will be provided before the land (including other assets) are acquired to allow displaced persons to achieve replacement of	Compensation and resettlement assistance will be delivered to PAPs before compulsory acquisition is effected

Theme	Local Legal Framework/Policy	WB OP 4.12 requirements	Measures to address Conflict/gap
		lost assets and settle appropriately before assets are taken	
Livelihood restoration.	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.
Grievance procedure	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 4.12 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
Occupier of the right of occupancy	Allows same remedies enjoyed by actual title holders to the extent of their rights.	Occupants are also covered as affected persons. Requires that resettlement assistance is provided for displaced persons	Will be provided compensation and resettlement assistance to appropriate to the magnitude of their losses
Encroacher, Squatters, settlers and migrants	No compensation or assistance provided in Nigerian laws	Entitled to **assistance** 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. Replacement items will be negotiated with affected persons and documented in the RAP.
Land-owners	Only persons with formal rights of occupancy granted by the governor are recognized. Does not cover compensation for value of land except for the rental value of persons with Certificate-of-Occupancy	Recommends land-for-land compensation. Recognizes different categories of claimants including (i) persons with formal legal title, (ii) persons who do not have formal legal rights to land at the time the census begins but have a claim to such land or assets--provided that such claims are recognized under the laws of the country or become recognized through a process and (iii) persons who do not have any form of title. Requires compensation for persons with title and recognized claims and resettlement assistance for persons without title.	All three categories of persons recognized by OP 4.12 will be considered for either compensation or resettlement assistance. Eligible PAPs will be compensated at Full Replacement Cost.
Owners of "Non-Permanent" buildings, installations	LUA does not clearly state provisions for temporary structures, even though the definition of structures include terms like "other structures" and "installations". All such unexhausted developments on land are eligible for compensation. Cash compensation based on market-depreciated value. Monetary Compensation is the primary means of compensation, though In-kind compensation is allowed under LUA s. 33 (1) and 6 (6)	OP 4.12 does not clearly describe how non-fixed assets should be handled but their circumstances are similar to those of squatters and encroachers. Requires that squatters and encroachers who may not have any recognizable claim to land will be assisted to achieve full restoration.	Owners of temporary and non-fixed structures will be provided with relocation assistance to move their structures to a new location and re-establish their livelihoods.
Cut-off date	No provisions on cut-off date	States that a cut-off date should be established by the borrower. Also states that persons who encroach in the project area after the cut-off date are not entitled to compensation or any other form of resettlement assistance. The cut-	Ensure the cut-off date (s) is clearly and adequately communicated through appropriate means.

Theme	Local Legal Framework/Policy	WB OP 4.12 requirements	Measures to address Conflict/gap
		off date is the date on which the census began and the date, after which PAPs will NOT be considered eligible for compensation, i.e. they are not included in the list of PAPs as enumerated during the census of PAPs..	
Disclosure of Information	Requires that all instruments should be disclosed in line with the Nigerian EIA laws for 21 working days.	Requires that the Resettlement Plan is made available at a place accessible to displaced persons and local NGOs, in a form, manner, and language that are understandable to them	The RAP report will be disclosed locally in Local Government Area (LGA) offices where the projects are located, the Federal Ministry of Environment Website and on the WB external website.
Determination of replacement value	Requires that compensation is paid for affected assets (except land) based on the replacement cost. The cost is assessed on the basis of the prescribed method of assessment as determined by the appropriate officer less any depreciation, together with interest at the bank rate for delayed payment of compensation.	Requires that a Resettlement Plan should be prepared that provides prompt and effective compensation at full replacement cost for losses of assets attributable directly to the project. For land, cash compensation levels should be sufficient to replace the lost land and other assets at full replacement cost in local markets	The RAP will offer compensation at full replacement cost for the value of affected assets. Method of valuation will be based on the replacement cost approach.
Restoration of livelihoods and living standards Support for displacement Development assistance.	Silent	Requires that affected persons provided with assistance with movement, transition support and to re-establish access to lost resources.	The project will provide affected persons with assistance with movement, transition support and to re-establish access to lost resources.
Vulnerable People	Silent	Requires that particular attention is paid to the needs of vulnerable groups among displaced persons, especially those below the poverty line, the landless, the elderly, women and children, indigenous peoples,15 ethnic minorities, or other displaced persons who may not be protected through national land compensation legislation.	The project will assess the level of vulnerability within the displaced population and provide differentiated relocation assistance suited to the needs of each group (including psychosocial supports and specialized mobility and transitional assistance) of displaced persons, with particular attention paid to the needs of the poor and the vulnerable. This additional assistance will be delivered as cash.
Consultation	Silent	Insists upon consultation and informed participation of all affected persons throughout resettlement process.	Ensure consultation and informed participation of all affected persons throughout resettlement process.
Monitoring and evaluation	Silent	Requires that the conditions of displaced persons should be monitored until they achieve restoration of all losses	A full M&E process which will track outputs and outcomes of the resettlement process will be designed and implemented

This RAP is aligned with the regulations of the Federal Government of Nigeria and the World Bank Operational Policies on Involuntary Resettlement (OP 4.12) that indicate best practices for rehabilitation of livelihoods of people affected by the implementation of the project.

However, in the event of divergence between the two, the World Bank safeguard policy took precedence over Nigeria Land Use Act since the former is the most stringent to ensure that the conditions of PAPs/PAHs are preferably improved and at least restored to pre-displacement levels as well as special considerations for vulnerable and landless PAP.

3.4.1 Conclusion Drawn from the Review of World Bank Policies on Involuntary Resettlement

This RAP has been prepared in accordance with the World Bank OP 4.12 on Involuntary Resettlement. The policy indicates the best practice approach for compensation of the PAPs identified across the projects sites before the commencement of the project and agrees that PAPs be compensated or assisted irrespective of legal status of PAPs to the land/or place they occupy. Wherever there is conflict between Nigerian or the a State Laws and the World Bank OP 4.12, this World Bank OP 4.12 (Involuntary Resettlement) shall take precedence.

3.5 World Bank Policy on Voluntary Land Donation

The World Bank's policy on voluntary land donations under OP 4.12 (Involuntary Resettlement) aims to ensure that any land donation for Bank-financed projects is truly voluntary, well-documented, and does not result in adverse impacts on the donor's livelihood or rights. **OP 4.12** is primarily concerned with involuntary resettlement, a situation where land is acquired without the owner's informed consent or power of choice. However, the policy recognizes that in some cases, land may be donated voluntarily by individuals or communities for project purposes. In such cases, OP 4.12 does not apply, provided strict criteria are met to ensure the process is genuinely voluntary and does not result in significant harm or coercion.
For donations that are voluntary, the following will be followed;

- The impacts must be minor, that is, involve no more than 10 percent of the area of any holding and require no physical relocation.
- The land required to meet technical project criteria must be identified by the affected community, not by line agencies or project authorities (nonetheless, technical authorities can help ensure that the land is appropriate for project purposes and that the project will produce no health or environmental safety hazards);
- The land in question must be free of squatters, encroachers, or other claims or encumbrances;
- Verification (for example, notarized or witnessed statements) of the voluntary nature of land donations must be obtained from *each* person donating land;
- If any loss of income or physical displacement is envisaged, verification of voluntary acceptance of community-devised mitigatory measures must be obtained from those expected to be adversely affected;
- If community services are to be provided under the project, land title must be vested in the community, or appropriate guarantees of public access to services must be given by the private titleholder; and
- Grievance mechanisms must be available.

However, If the donation is not truly voluntary, or if there is any doubt about the legitimacy or voluntariness of the process, OP 4.12 is triggered, and a Resettlement Policy Framework (RPF) or Resettlement Action Plan (RAP) must be prepared. OP 4.12 also applies if the infrastructure is site-specific and cannot be relocated, as this may create pressure on landowners to donate.

If the above guidance is followed, land donation will be acceptable provided the PIU can demonstrate that:

- the potential donor or donors have been appropriately informed and consulted about the project and the choices available to them including the impacts of the project activities
- potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation (through consultation with documentation;
- the amount of land being donated is minor and will not reduce the donor's remaining land area below that required to maintain the donor's livelihood at current levels;

- no household relocation is involved;
- the donor is expected to benefit directly from the project; (clearly defined benefit of the donors) and
- for community or collective land, donation can only occur with the consent of individuals using or occupying the land beyond just the traditional /community leader donating land.
- The PIU establishes that the land to be donated is free of encumbrances or encroachment
- Any donated land that is not used for its agreed purpose is returned to the donor.

CHAPTER 4: IDENTIFICATION OF PROJECT IMPACTS AND PROJECT AFFECTED PERSONS

4.1 Introduction

The foremost task in planning resettlement is to identify a project's adverse impacts and the populations that will be affected. The ultimate goal of a RAP is to enable those displaced by a project to improve their standard of living beyond pre-project levels.

The RAP must identify all people affected by the project and all adverse impacts on their livelihoods associated with the project's land acquisition. Consultation with community leaders, and other representatives of the affected population is essential to gaining a comprehensive understanding of the types and degrees of adverse project effects.

An assessment of the impacts from the PHCs' renovation and construction works across 53 PHCs identified a total of 15 PAPs (7 males and 8 females). The majority of PAP cases involved 1 or 2 individuals/PHC, pointing to small-scale effects, likely tied to farming, residential use, or business activities. The largest case involved 8 PAPs, which resulted from the displacement of businesses and loss of structures (permanent and make-shift) in Ojoo PHC in Akinyele LGA of Oyo State. This Resettlement Action Plan (RAP) has been prepared in order to adequately manage the anticipated impacts of involuntary resettlement, and it contains mitigation measures to address impacts associated with loss of structures, economic trees, income, and also provides support to vulnerable groups.

4.2 Impact Reduction Measures Undertaken

One of the key requirements of OP 4.12 is to avoid land acquisition that results in physical and /or economic displacement and resettlement. However, where such displacement and resettlement is unavoidable, that is, where suitable alternative project sites are not available or the cost of developing those sites is prohibitive – OP 4.12 requires that adverse resettlement impacts on affected individuals and communities are minimized through project design, adjustments in the routing or siting of project facilities, etc. As a proactive measure to minimize the adverse impacts of land acquisition and resettlement, the IMPACT Project strategically adopted voluntary land donation (VLD) as an alternative to compulsory acquisition. This approach was guided by the principles outlined in the World Bank Operational Policy on Involuntary Resettlement (OP 4.12), which emphasize avoidance and minimization of physical and economic displacement wherever feasible. Although there are two cases where acquisition of land 1 PHC (1.9%) and pre-existing building 1 PHC (1.9%) were carried out.

The following mitigations approaches were applied

1. Adoption of Voluntary Land Donation: As an alternative to compulsory acquisition, communities, Governments, families and individuals voluntarily provided land for construction and renovation of PHCs. This ensure that implementation proceeded without triggering large-scale displacement or resettlement.
2. Prioritization of vacant government or community Land: Site selection prioritized vacant land free of assets owned by communities, local governments, or public institutions, thereby reducing the likelihood of economic or physical displacement of individuals or households.
3. Documentation of Land Donations and Acquisitions: Each voluntary land donation and acquisitions were supported by written agreements signed by donors, witnesses, and local authorities to confirm that the process was transparent, informed, and consensual.
4. Consultation and Stakeholders Engagement: Extensive consultations were held with community leaders, local government officials, family members, landowners, and vulnerable groups to ensure they fully understood the implications of land donation and consented freely to the process.
5. Minimization of Footprint and Design Optimization: Where possible, design adjustments were made to reduce the land area required for new construction, thereby avoiding encroachment into residential or livelihood areas.

6. Livelihood Safeguards for affected Persons: In cases where minor physical and economic impacts were unavoidable, such as loss of access to farmland, loss of assets and temporary livelihood disruption, livelihood restoration support and retrospective compensation measures were provided in accordance with OP 4.12 provisions.
7. Establishment of a Grievance Redress Mechanism (GRM): To ensure fairness and transparency, a functional GRM was established to receive and address complaints related to land donation and acquisitions, verification, and construction activities.

4.3 Positive Impacts of the Project

The renovation and construction work for the 53 PHCs will have the following positive impacts:

1. Enhancement of Community Health Infrastructure: The renovation, expansion, and construction of PHCs improved the quality and accessibility of healthcare services
2. Improved Livelihood Opportunities: Construction activities created jobs for local artisans and workers, contributing to short-term income generation.
3. Strengthened Social Infrastructure and Service Delivery: Boreholes and solar systems improved water and power access, ensuring better healthcare service delivery
4. Promotion of Gender and Social Inclusion: The addition of staff quarters and improved facilities attracted female health workers and supported vulnerable groups.
5. Strengthened Community–Government Partnership: Voluntary land donation encouraged cooperation between communities and authorities, ensuring transparency and local ownership.

4.4 Negative Impact of the Project

The summary of involuntary resettlement impacts, including physical and economic displacement and effects on livelihoods, is presented in Table 6 below

Table 6: Category of Impacts

Category of Impact	Number of PAPs	State	LGA	PHC	Total Land Size (m) Affected
Farmlands	2	Oyo	Iwajowa	PHC Ajimoti	40 x 46
			Iwajowa	PHC Ajimoti	40 x 46
	2	Benue	Obi	PHC Ameka	60 x60
			Ado	PHC Odebo	30 x 30
	1	Taraba	Wukari	PHC Pwazu	50 x 50
Structures (Concrete block and mud building, and makeshift structure)	8	Oyo	Akinyele	PHC Ojoo	4 x 5
			Akinyele	PHC Ojoo	2 x 2
			Akinyele	PHC Ojoo	2 x 1
			Akinyele	PHC Ojoo	2 x 2
			Akinyele	PHC Ojoo	2 x 2
			Akinyele	PHC Ojoo	2 x 1
			Akinyele	PHC Ojoo	2 x 1
			Akinyele	PHC Ojoo	2 x 1

Category of Impact	Number of PAPs	State	LGA	PHC	Total Land Size (m) Affected
	1	Nasarawa	Nasarawa	PHC Angwan Mallam	20 x 10
Economic trees	1	Oyo	Iwajowa	PHC Ayeda Ikia	100 x 50

Table 7: Summary of Displacement Impacts

S/N	NAME OF PAP	TYPES OF AFFECTED STRUCTURE
Oyo		
1.		Permanent Structure (Concrete Block) biggest shop Pomade
2.		Permanent Structure (Concrete Block) Food Stuff
3.		Makeshift Metal container Food stuff
4.		Makeshift Structure kioks (wood) Food stuff
5.		Permanent Structure (Concrete Block) canteen
6.		Permanent Structure (Concrete Block) Boutique
7.		Permanent Structure (Concrete Block) 2 shops canteen
8.		Permanent Structure (Concrete Block) Phone Accessories
9.		Farm (vegetables)
10.		Farm (vegetables)
11.		Cashew plantation
Benue		
12.		Farm
13.		Farm (crops cultivation and livestock rearing)
Nasarawa		
14.		Football viewing centre
Taraba		
15.		Groceries farm

Table 8: Types of Displacement Across the Affected PHCs

State	LGA	PHC/SITE	Type of Displacement		Impact	Type of Land User[2]
Oyo	Akinyele	PHC Ojoo	Physical Displacement	Economic Displacement	Loss of structures (Permanent and make-shift) Loss of customers due to relocation	Informal User
	Iwajowa	PHC Ajimoti	Nil	Economic Displacement	loss of income source from farming	Formal User
	Iwajowa	PHC Ayede Ikia	Nil	Economic Displacement	loss of income source from economic trees	Formal User
Taraba	Wukari	Pwazu PHCC	Nil	Economic Displacement	loss of income source from farming	Informal User
Nasarawa	Nasarawa	PHC Angwar Malam	Nil	Economic Displacement	Loss of business	Formal User
Benue	Ado	PHC Odebo	Physical Displacement	Economic Displacement	Farming activities	Informal User
	Obi	PHC Ameka	Nil	Economic Displacement	loss of income source from farming	Formal User

This RAP has identified all people affected by the project and all adverse impacts on their livelihoods associated with the project's land acquisition.

[2] Formal Occupants: Any person or persons with a right to use a property either through a rent/lease, formal or legal agreement, etc. They may not own the property, but may be living on the property or using the property for business/farming purposes with full consent of the owner and proper/legally binding agreement with or without payment.

Informal Occupants: Any person or persons who is utilizing a property without the due consent or agreement of the owner. This may include squatters, temporary business sheds/structures, makeshifts, farming, etc. without any payment or agreement

Projected impacts include:

- Loss of structures (block and mud buildings and make-shift structures) will be permanent, as these structures falls within the construction areas.
- Permanent loss of farming land and economic trees (Cashew).
- Reduced income resulting from economic displacement in 8 PHCs (15.1%).
- Loss of residential

4.4.1 Inventory of Affected Assets/Structures in the Project Area

As shown in table 9, a total of 15 PAPs spread across 8 PHCs wll be impacted by the project activities. Impacts identified include the loss of assets (physical) loss of income/business (economic), and farmland

Table 9: Inventory of affected assets/structures

State	LGA	PHC	Number of PAPs			Number of Permanent Structures	Number Temporary Structures	Crops / Trees	Land Size/ Assets dimension (m)
			Male	Female	Total				
Oyo	Iwajowa	PHC Ajimoti	0	1	1	0	0	1	40 x 46
	Iwajowa	PHC Ajimoti	1	0	1	0	0	1	40 x 46
Benue	Obi	PHC Ameka	1	0	1	0	0	1	60 x 60
	Ado	PHC Odebo	0	1	1	0	0	1	30 x 30
Taraba	Wukari	PHC Pwazu	0	1	1	0	0	1	50 x 50
Oyo	Akinyele	PHC Ojoo	0	1	1	1	0	0	4 x 5
	Akinyele	PHC Ojoo	1	0	1	1	0	0	2 x 2
	Akinyele	PHC Ojoo	0	1	1	0	1	0	2 x 1
	Akinyele	PHC Ojoo	0	1	1	0	1	0	2 x 2
	Akinyele	PHC Ojoo	0	1	1	1	0	0	2 x 2
	Akinyele	PHC Ojoo	1	0	1	1	0	0	2 x 1
	Akinyele	PHC Ojoo	0	1	1	1	0	0	2 x 1
	Akinyele	PHC Ojoo	1	0	1	1	0	0	2 x 1
Nasarawa	Nasarawa	PHC Angwan Mallam	1	0	1	0	1	0	20 x 10
Oyo	Iwajowa	PHC Ayeda Ikia	1	0	1	0	0	1	100 x 50
		Total	**7**	**8**	**15**				

4.4.2 Census of Project Affected Persons (PAPs)

An assessment of the conditions of activities along the project sites identified 15 persons who would be affected by the intervention works. The census of PAPs is presented in table below.

Table 10: Census of PAPs

Category of Impact	State	LGA	PHC	Number of PAPs		
				Male	Female	Total
Farmlands	Oyo	Iwajowa	PHC Ajimoti	0	1	1
		Iwajowa	PHC Ajimoti	1	0	1
	Benue	Obi	PHC Ameka	1	0	1
		Ado	PHC Odebo	0	1	1
	Taraba	Wukari	PHC Pwazu	0	1	1
Structures (Concrete block and mud building, and makeshift structure)	Oyo	Akinyele	PHC Ojoo	0	1	1
		Akinyele	PHC Ojoo	1	0	1
		Akinyele	PHC Ojoo	0	1	1
		Akinyele	PHC Ojoo	0	1	1
		Akinyele	PHC Ojoo	0	1	1
		Akinyele	PHC Ojoo	1	0	1
		Akinyele	PHC Ojoo	0	1	1
		Akinyele	PHC Ojoo	1	0	1
	Nasarawa	Nasarawa	PHC Angwan Mallam	1	0	1
Economic trees	Oyo	Iwajowa	PHC Ayeda Ikia	1	0	1
			Total	**7**	**8**	**15**

4.5 Entitlement and Eligibility

The Resettlement Action Plan as an instrument for minimizing impacts from displacement and resettlement provides guidelines and procedures for identifying eligible persons for compensation and various entitlements for varied categories. This section provides the definition of displaced persons and criteria for determining their eligibility for compensation and other resettlement assistance.

Census enables the enumeration and collection of basic information on the affected population; it establishes a list of legitimate beneficiaries before the project's onset. The census lays a framework for subsequent socioeconomic survey needed to establish a fair compensation rates and to design, monitor and evaluate sustainable income restoration. The list of all PAPs eligible for compensation is shown in Annex A

The census carried out has enabled the project to identify potential PAPs to be affected by the project and who will be eligible for compensation. The PAPs who are impacted physically and economically by the

project fall under the eligibility criteria of OP 4.12 paragraph 15(a), (b), and (c) and shall be considered eligible for compensation under this RAP.

The objective of the census was to identify and determine the number of Project Affected Persons (PAPs) and the impacts on their assets and livelihoods as a result of physical and economic displacement that will be caused by the intervention works. The census of PAPs for the RAP was conducted using the schedule below for each affected PHCs.

Table 11: Census of PAPs Per Affected PHCs

LGA	PHC	Census date
Iwajowa	PHC Ajimoti	10th Septemeber,2025
Obi	PHC Ameka	10th Septemeber,2025
Ado	PHC Odebo	11th Septemeber,2025
Wukari	PHC Pwazu	10th Septemeber,2025
Akinyele	PHC Ojoo	13th Septemeber,2025
Nasarawa	PHC Angwan Mallam	12th Septemeber,2025
Iwajowa	PHC Ayeda Ikia	12th Septemeber,2025

A total of 15 PAPs will be affected pointing to small-scale effects tied to loss of access to farmlands (5), loss of structures (Permanent and Make-shift) (9), and loss of source of income from economic (1).

4.5.1 Entitlement Matrix for the PAPs

The matrix shows specific and applicable categories of PAPs under the IMPACT project and types of losses as well as entitlement planned for PAPs. The entitlement matrix builds upon the gap-filling measures designed to address the gaps between the country system requirements and OP 4.12. The Entitlement matrix therefore is the basis for compensation budget, resettlement and income restoration measures to be administered by project. The subsequent section further provides explanation of the entitlement matrix under eligibility criteria for entitlements.

Table 12: Entitlement Matrix Table for PAPs[3]

Type of Loss	Entitled Person	Description of Entitlement
1. Permanent loss of land[4] 1.1 Cultivable/residential /commercial land	1.1 (a) Legal owners of land	Cash for land compensation is preferred priority at replacement value based on market rate plus 10% compulsory acquisition surcharge.
	1.1 (c) Tenant	Relocation assistance will be provided
2. Loss of income and livelihood 2.1. Temporary loss of access to land for cultivation	2.1. Cultivator occupying land	2.1. Estimated net income for each lost cropping season, based on land record averages of crops and area planted in the previous four years

[3] It is noteworthy that this is a generic Entitlement Matrix and items captured and presented as losses in tables 3 – 4 above will be compensated as per entitlements in this Matrix

[4] It is important to note that no adverse impacts were recorded from land acquisition, as all lands utilized for the PHC intervention works were either voluntarily donated or purchased and subsequently donated to the facilities

Type of Loss	Entitled Person	Description of Entitlement
2.2. Loss of agricultural crops, and fruit and wood trees. 2.3 Loss of income by agricultural tenants because of loss of land they were cultivating	2.2. (a) Owner/s of crops or trees. Includes crops trees owned by encroachers/squatters	2.2. (a) Cash compensation for loss of agricultural crops at current market value of mature crops, based on average production. Compensation for loss of fruit trees for average fruit production years to be computed at current market value including for annual income losses from the productive capacity of the crop/tree for the duration of maturity of the tree to fruit bearing capacity. Compensation for loss of wood-trees at current market value of wood (timber or firewood, as the case may be).
	(b) tenant	2.2. (b) Partial compensation to tenants for loss of their crops/trees as per due share or agreement (verbal or written)
	2.3 Persons working on the affected lands	2.3 One-time lump sum grant to agricultural tenants (permanent, short-term or long-term agricultural labor (this will be in addition to their shares in crop/tree compensation).The one-time lump sum will be calculated based on the average annual net income derived from their agricultural activities over the previous three years, or where records are unavailable, based on the prevailing average local market rates for similar agricultural labor. The calculation basis is premised on the type of crops cultivated/average yield per season, the average market price of the agricultural produce, and the cost of cultivation to determine net income. Furthermore, transitional assistance will be provided to enable the affected persons to secure alternative agricultural land or engage in other livelihood restoration activities through livelihood support programs included in the RAP. a) **Tree/perennial crops:** Harvesting of the crops will be given a first priority but where harvesting is not possible, counting of the affected crops will be done in the presence of the owner. Computation of the costs will be done according to market rates b) **Annual crops:** Crops will be harvested by the owner and therefore no compensation will

Type of Loss	Entitled Person	Description of Entitlement
		be paid for crops. Where crops cannot be harvested compensation at the market rate will be paid
3. Permanent loss of Structures 3.1 Residential and commercial structures	3.1. (a)Owners of the structures whether or not the land on which the structure stands is legally occupied	3.1. (a) Cash compensation for loss of built-up structures at full replacement costs Owners of affected structures will be allowed to take/reuse their salvageable materials for rebuilding/rehabilitation of structure. In case of relocation, transfer allowance to cover cost of Shifting (transport plus loading/unloading) the effects and materials will be paid on actual cost basis or on current market rates. (b) Onetime cash assistance equivalent to 3 months' rent moving to alternate premise.
3.2. Cultural, Religious, and community structures /facilities School, church, water channels, pathways, and other community structures/installations	3.2. Community	3.2. Complete rehabilitation/restoration by the Project; or, Cash compensation for restoring affected cultural/community structures and installations, to the recognized patron/custodian.
4. Special provision for vulnerable Affected Persons	4.1 Reestablishing and/or enhancing livelihood. 4.2 Change in Livelihood for women and other vulnerable APs that need to substitute their income because of adverse impact.	4.1 Full compensation for affected assets (physical or economic displacement). In addition to compensation, provide additional allowance for at least 3 months. Provide livelihood restoration program to vulnerable persons. Provide allowance equivalent to 3 months national minimum wage subsistence income.
Unanticipated adverse impact due to project intervention or associated activity	The Project team will deal with any unanticipated consequences of the Project during and after project implementation in the light and spirit of the principle of the entitlement matrix[5].	

4.5.2 Description of Eligibility Criteria for Defining Various Categories of PAPs

Based on the policy guideline of the World Bank's OP4.12 paragraph 15(a), (b) and (c) described below:

a) Those who have formal legal rights to land (including customary and traditional rights recognized under the laws of the country.
b) Those who do not have formal legal rights to land at the time the census begun but have a claim to such land or assets provided that such claims are recognized under the laws of the country or become recognized through a process identified in the resettlement plans.

[5] In the event that the contractor or its staff impact on any asset outside the RAP as a result of negligence and/or going outside the setbacks provided by this RAP, the cost for compensation shall be borne by the contractor.

c) Those who have no recognizable legal rights or claim to the land they are occupying.

Persons having no legal rights to land under law may not be compensated for the land they occupy but they are entitled to compensation for other assets (e.g. housing) and to receive assistance. In practice, this may mean that encroachers and other non-legal occupants receive the same entitlement as those having legal rights. Tenants may be granted resettlement entitlements along with owners or they may be given a subsidy to find a new rental property.

All PAPs irrespective of their status, whether they have formal titles, legal rights or encroacher encroaching illegally on land, are eligible for some kind of assistance if they occupied the project area before the cut-off date. All persons residing, conducting activities or earning income within the project affected areas before the cut-off dates (see Table 18 above) will be entitled to compensation and resettlement assistance, if it can be shown that project-related involuntary resettlement will be responsible for lost property, loss of access, etc.

4.6 The Valuation methodology

The method of valuation has been communicated to and dialogued with the PAPs during consultations as presented as follow:

4.6.1 Full Replacement Cost Method

The Full Replacement Cost Method, which is used in estimating the value of the asset/structure, is based on the assumption that the capital value of an existing development can be equated to the cost of reinstating the development on the same plot at the current labour, material and other incidental costs that should include any transaction costs, which include administrative charges, registration or title fees, reasonable moving expenses, and any similar costs imposed on affected persons. The estimated value represents the cost of the property as if new. It is important to ensure that before civil work commences, PAPs will be provided full replacement cost of lost assets/structures and other impacted assets and are able to rebuild or replace their assets/structures without difficulties. The valuation estimates asset compensation rates based on full replacement without depreciation.

4.6.2 Valuation Methods for Categories of Impacted Assets

4.6.2.1 Valuation Method of Structures at Full replacement Cost

Replacement cost is the amount calculated before displacement, which is needed to replace an affected asset without deduction for taxes and/or costs of transaction.

The approach involves the direct replacement of the expropriated assets and covers an amount that is sufficient for asset replacement, net depreciation, moving expenses and other transaction costs. This minimum value is then compared to the costs of the new measures. This is arrived at by analyzing the current construction costs relative to the design, materials employed personnel, workmanship and final finish of the subject properties.

The valuation of compensation for the loss of land and/or tress, if any are based on the prevailing market value. This will be determined via market survey of land per square meter and the market prices of the affected Trees in the project areas.

Note: PAPs will have the right to salvage all materials, even for fixed assets for which they would receive cash compensation at full replacement cost.

4.6.2.2 Relocation of Business and Trading Assets (Moving Allowances

The cost of relocation activities for existing owners of business assets was estimated by conducting a market survey on the potential costs of relocating physical facilities within the project area. An estimated market survey for moving allowance is shown in table below. For small traders, relocation of business was determined on the basis of light-sized transport means (makeshift sheds, kiosks and shed) while assumptions for other categories of project affected persons was made for larger businesses.

The average prices of the items obtained from the local markets was carried out in different markets across the affected PHCs in October 2025 with outcome presented in Table 13. The table shows that

- Projected income loss over a period of 6 months as anticipated for the PHC rehabilitation and construction disturbances in project areas.
- Estimates of income losses was based on general income levels among PAPs.
- Estimates of replacement costs was based on actual current costs from market survey conducted.

Table 13: Amount estimated for moving allowance for businesses

Business	Estimated Moving Allowance	USD equivalent
Owners of Containers	₦30,000	$20.5
Kiosk and makeshift	₦20,000	$13.6

USD 1 = NGN 1,463 as at 15th October, 2025. This exchange rate may change before implementation.

Market Survey

(A) Construction material

Assets valuation was carried out by utilizing the general principle adopted in the formulation of the compensation valuation that lost income and asset will be valued at their full replacement cost such that the PAPs should experience no net loss. This was conducted using the current market prices in this project area. Data captured during valuation of structures include structure type, Dimensions/ total floor area, type of doors, windows, roof type, walls, and foundations.

Table 14: Market Survey for Construction Materials carried out in LGA markets

S/N	ITEMS	UNIT	UNIT COST (₦)
1	Cement	Kg	10,500
2	Blocks	Inch 6/9	600
3	Nails	Kg/LB	1000
4	Timbers 2x2	Nos	900
	2x3	Nos	1,500
	2x4	Nos	2,300
	1x10	Nos	4,700
5	Sand	Per truck/Cubic meter	70,000
6	Gravel	Per truck/Cubic meter	220,000
7	2x2 Wire Mesh	Bundle	18,000
8	Corrugated iron sheets. Zinc sheets	Bundle	65,000
9	Labour	Daily	5,000

Survey carried out on 10th of October, 2025

Note: The average values were considered for the replacement costs.

(B) Fruit trees/Farm crops

The Full Replacement Cost Method was used in estimating the value of the economic trees based on market survey conducted within the project community and the resultant figure become the compensation value. The cost derivation table for economic trees was based on the market surveys as provided in Annex A.

Current market values were derived from pricing these farm products in the local market. The results for market survey are provided in the table below.

Table 15: Market Survey for Fruits of Economic trees carried out in Iwajowa LGA Markets

Tree Type	Price/kg (₦)
Cashew	1,550

(C) Economic Losses (Loss of business income)

In calculating for loss of business income with all data available the methodology below can be adapted;

BI = T x Q x V OR Economic Losses = T x (Average hourly/daily profits)

Where,
BI= Business Inconveniences
T- no of time (hours/days) operation are shut down
Q- the quantity of goods normally produced or sold/unit time used in T
V- the value of each unit of goods

The above formula was employed considering that the construction activities will be carried out in segments in the affected PHCs, and affected businesses will need to be relocated to carry out their activities in other suitable locations identified in the area, thereby reducing the number of days for loss of income. However, the maximum number of 3 months business closure period was used in calculation to compensate for net profit. (It is noteworthy that the proposed project is to be carried out in rural areas with minimal economic activities. Additionally, the affected economic centers are micro-to-petty traders with fixed, makeshift/ moveable structures, or small shops).

Table 16: Compensation and Valuation Rates

Business Structures	Economic Loss/ Business Disturbance (₦)	USD equivalent ($)
Owners of fixed structures	150,000	102.51
Owners of movable structures	150,000	102.51

USD 1 = NGN 1,463.23 as at 15th October, 2025. This exchange rate may change before implement.

The affected businesses vary in scale, nature of operations, and income levels. Findings from the field assessment reveal that the average monthly income of the Project Affected Persons (PAPs) ranges between ₦30,000 and ₦65,000. In accordance with the livelihood restoration framework, each PAP will receive a business support allowance equivalent to three months of average income, translating to an estimated ₦100,000 to ₦200,000 per beneficiary. This support measure is intended to mitigate temporary economic displacement, cushion the effects of business disruption, and facilitate continuity and recovery of livelihood activities during and after project implementation.

4.7: Compensation and Resettlement Assistance

Under this RAP, compensation will be considered for structures, economic trees and loss of livelihood resulting from loss of access. Compensation payment to PAPs shall be in kind, cash or other assets given in exchange/replacement for the taking of or loss of other assets, including fixed assets thereon, in part or whole. In other words, the affected persons must be able to have their structure rebuilt in a different location using the compensation paid for the old structure if applicable. Depreciation will not be taken into account while calculating the cost of affected structures.

The Compensation package will also include relocation costs, such as transport costs. All payments or compensation and resettlement assistance shall be made in the forms as agreed with each PAP. Payment of compensation will be made by the Resettlement Implementation Committee RIC and witnessed by an NGO engaged by the SPIU. Compensation benefits shall be settled before the construction phase of the project.

All Project Affected Persons would be restored to the status that is at the minimum commensurate to their pre-project status or more in accordance with the World Bank Policy on involuntary resettlement. Owners of immovable structures will be paid compensation that will be based on assessed values of their properties and this shall be at the:

- Full replacement cost of structure; and
- Cost of economic trees to be affected at full market price, inclusive of cost of tree value, replacement costs and costs of nurturing of tree for a period it reaches maturity and, payment of income loss till the tree reaches its pre-project production level. In addition to being guided by the market price and the relevant national law, the overall compensation for economic trees will be guided by the provision of the World Bank Policy on involuntary resettlement.

The Resettlement Implementation Committee (RIC) in conjunction with the SPIUs will jointly verify the genuineness of each PAP as stated in the register. Payments will be made to all PAPs at a designated location within the project area (preferably the residence of the community as stated by the PAPs) and adequate information will be made available to all affected persons before payment. Such information will include how the payment will be made and dates, etc.

4.8 Description of Additional Support

4.8.1 Livelihood Restoration Support Program (LRSP)

It is considered good practice to implement additional improvement measures for the project affected persons (PAPs), in other to restore livelihoods at pre-project level, as well as to improve livelihood in order to reduce vulnerability and gender inequality. One of the objectives of this RAP is to ensure that they are reasonably assisted to regain their livelihoods to pre-project condition or better. Additional measures to gain livelihood restoration for PAPs with affected livelihoods have been highlighted below.

Table 17: Livelihood Restoration Measures

PAP Category	State	LGA	PHC	Number of PAPs		Additional Support
Owners of Structures used for Businesses	Oyo	Akinyele	PHC Ojoo	0	1	(a) . Market Linkage and Cooperative formation to support PAPs to form or join cooperatives for bulk purchasing, marketing, and access to credit
		Akinyele	PHC Ojoo	1	0	
		Akinyele	PHC Ojoo	0	1	
		Akinyele	PHC Ojoo	0	1	
		Akinyele	PHC Ojoo	0	1	
		Akinyele	PHC Ojoo	1	0	
		Akinyele	PHC Ojoo	0	1	
		Akinyele	PHC Ojoo	1	0	
	Benue	Ado	PHC Odebo	0	1	
	Nasarawa	Nasarawa	PHC Angwan Mallam	1	0	
Economic trees Owner	Oyo	Iwajowa	PHC Ayeda Ikia	1	0	(a) Provide farmers with improved seedlings to reduce the yield period.

4.8.2 Vulnerability Adjustment Support Program (VASP)

The objective of vulnerability adjustment support program for the vulnerable persons is to ensure that they are reasonably assisted to overcome potential economic shock from the project and maintain the quality of life not less than their pre-project state because; they are at higher risk than others based on their vulnerability disadvantage.

About 5 PHCs (9.43%) identified vulnerable groups, with a total of 11 individuals recorded. The vulnerability justification was based on age (60 years above), (5), widows/female heads of household (5), highlighted as more at risk from livelihood loss and less able to adapt. This underscores the need for age-sensitive safeguards, and vulnerability support mechanisms.

This VASP shall be funded through the amount to be set aside for administration within the livelihood restoration budget. This fund will be set aside by the IMPACT project through its counterpart responsibility to the project's due diligence and shall be operated/administered by the SPIUs and the RICs.

Though PAPs within the area are placed along the lower-middle income class, it is, however, not inconceivable that the project impact will affect their sustenance and standard of living if not mitigated.

4.8.2.1 Analysis of Impacts and Income Restoration Measures for Vulnerable Group/PAPs

Table 18: Analysis of Impacts and Income Restoration Measures

No	Type of vulnerability	No. of PAPs	Additional Vulnerability-Differentiated Measures
1.	Age	4	(a) Additional financial support[6] (b) Delivery of Compensation at PAPs residence
2.	Widow/Women Head of Household	5	(a) Additional financial support (b) Access to income earning opportunities. (c) Additional empowerment for income earning opportunities. (d) LRSP training for business owners in financial planning practicable to the group. (e) Facilitation of memberships and participation to women saving cooperatives, savings and loans, (under State Ministry of Women Affairs in the participating states).

This is further presented in Annex 2

4.9 Performance Indicator for Assessing Income Restoration

These performance indicators help to measure the level of effectiveness of efforts deployed to achieve the restoration of income PAPs/PAHs. The socioeconomic study conducted established the average monthly income distribution of PAPs and PAHs. Project impacts may affect income adversely. Although this RAP highlights measures for income and livelihood restoration, the following are the indicators for measuring the effectiveness of these measures.

No	Indicator	Description
1.	Post-intervention income levels of PAPs/PAHs	Income of PAPs/PAHs post intervention are restored to pre-project level or even better when compared with the socioeconomics profile and analysis of PAPs/PAHs in section 2.3.2 of this RAP.
2.	Number of unemployed PAPs	This measures the number of PAPs who have gained employment post-intervention against those who are unemployed pre- and post-project activities.
3.	Diversification of income sources	This RAP makes provision for training on additional income sources for PAPs/PAHs. This indicator measures how many PAPs/PAHs have

[6] Additional financial support includes a Vulnerability Adjustment Support of ₦50,000 for vulnerable groups, such as aged widows, female heads of household, and large families. Furthermore, a Livelihood Restoration Support Programme is provided, with assistance ranging from ₦100,000 - ₦450,000, as seen in Annex 1(Cost Derivative Table)

		been able to gain diversified income generation between pre- and post-project intervention phase.

This table presents the performance indicators to measure effectiveness of income restoration efforts. However, the detailed monitoring indicators for the RAP implementation is presented in section 9.4 of this RAP.

4.10 Proof of Eligibility

An identification mechanism for identification to serve as proof of eligibility for compensation of PAPs has been developed. The comprehensive list of PAPs detailing PAPs compensation, names, phone numbers, and, GPS coordinates and special catalogue numbers is shown in Annex A. The list also highlights their socio-economic status and compensation costs. In cases where PAPs do not have phone numbers, such PAPs will be recognized by the community leaders, in as much as the name used for claim is same as that in the census register and the catalogue containing the PAP Identity Card. Alternative means of proof of eligibility will include: affidavit signed by landlords and tenants for affected assets. Witnessing or evidence by recognized trade union heads, traditional authority, customary heads, community elders, family heads, elders and the general community.

4.11 Duration for Civil Works

The duration for civil works according to the design report is 12 months. It is expected that all PAPs are to be compensated before the civil works commences.

4.12 Cut-Off Date

Table 19: Cut-off dates per affected PHCS

LGA	PHC	Cut-off date
Iwajowa	PHC Ajimoti	11th Septemeber,2025
Obi	PHC Ameka	11th Septemeber,2025
Ado	PHC Odebo	12th Septemeber,2025
Wukari	PHC Pwazu	11th Septemeber,2025
Akinyele	PHC Ojoo	14th Septemeber,2025
Nasarawa	PHC Angwan Mallam	13th Septemeber,2025
Iwajowa	PHC Ayeda Ikia	13th Septemeber,2025

CHAPTER 5: GRIEVANCE MECHANISM (GM)

5.1 Introduction

Dissatisfactions may arise through the process of compensation for various reasons, including disagreement on the compensation value during valuation for assets, controversial issue on property ownership etc. Grievance Redress Committee are mostly established to address matters affecting PAPs during implementation of RAP in project affected areas.

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

- Dispute between contractors and the stakeholders on land encroachment;
- Dispute between contractors and the host community from impact of work activities such as noise, dust generation, and the non-engagement of local youths by contractors etc;
- Failure to register PAP or identity of individual is disputed;
- Losses not identified correctly;
- Inadequate assistance or not as per entitlement matrix;
- Dispute about ownership;
- Delay in disbursement of assistance; and
- Improper distribution of assistance

This GRM describes the step-by-step process for registering and addressing grievances and provide specific details regarding a cost-free process for registering complaints, response time, and communication modes. It also describes the mechanism for appeal and the provisions for approaching civil courts if other options fail.

5.2 Objectives and Goals of the GM

The GRM has the following objectives:

- Establish a prompt, easy to understand, culturally appropriate, consistent, acceptable and respectful mechanism to support the receiving, investigating and responding to complaints or grievances from community stakeholders.
- Ensure proper documentation of complaints or grievances and any corrective actions taken; and
- Contribute to continuous improvement in performance of the Project through the analysis of trends and lessons learned.

The goals of the GM are to ensure people use the system, staff understand what is going well or poorly with program design and implementation, and communication messages around the GM are tested and improved.

This Grievance Mechanism aims to provide an effective platform for the resolution of complaints and grievances related to activities of the IMPACT Project in the participating states. The following are the objectives and goals of the mechanism:

Objectives:

The objectives of the Grievance Mechanism are:

- To ensure that the views and concerns of beneficiaries under the IMPACT program are heard and acted upon in a timely, effective, and transparent manner.
- To establish a prompt, easy to understand, consistent and respectful mechanism to support the receiving, investigating, and responding to complaints or grievances from community and stakeholders, and
- To ensure proper documentation of complaints or grievances and any corrective actions are taken.

In general, goals of the GM are to ensure people use the system, staff understand what is going well or poorly with program design and implementation, and communication messages around the GRM are tested and improved.

It important to note at this stage that Gender-Based Violence-GM has a separate process and steps which is captured under the project wide GM. It does not include investigation, and documentation is specific to ensure survivor confidentiality.

5.3 Justification for the Grievance Mechanism (GM)

The Grievance Redress Mechanism (GRM) describes the process by which people affected by the project can bring their grievances to the project management in a culturally appropriate manner, for consideration and redress. It is understood that effective organizational design and coordination substantially decrease the probability of problems in implementation. Nevertheless, some affected persons are still likely to believe they have been treated inadequately or unfairly. Providing an accessible and credible means for PAPs to pursue any grievances may decrease the likelihood of overt resistance to the project or of protracted judicial proceedings that can halt implementation. Thus, in the event that grievances arise, this redress mechanism shall be prepared to address such. The GRM designed herewith has the objective of solving disputes at the earliest possible time, which is in the interest of all parties concerned. As much as possible; clear procedures for filing and resolving grievances from the affected population shall be designed.

During the consultations, the affected persons were been informed on the provisions for addressing any complaints or grievances. The grievance procedure will further be made available to the affected persons through project implementation. The mechanism provides an affordable and accessible procedure for third-party settlement of disputes arising from resettlement.

5.4 RAP Grievance Mechanism Process

By the time the individual resettlement plans will be approved, and individual compensation contracts signed, affected individuals and communities would be informed of the process for expressing dissatisfaction and to seek redress. The grievance procedure will be simple and administered as far as possible at the local levels to facilitate access, flexibility and ensure transparency. All the grievances will be channeled via the Resettlement and Compensation Committee for the proposed project.

As much possible a localized mechanism that take account of the specific issues, cultural context, local customs, and project conditions and scale have been adopted for this RAP. The Grievance procedures highlighted in this Chapter fall into four steps as outlined in the table below.

Table 20: RAP Grievance Procedures Steps

Step	Category	Activities
1	Reception and registration	PAP files complaints or grievances with regard to any aspect of the resettlement project verbally, in writing or through a representative in English or local language. Complaint recorded by the implementing agency with the name of the complainant, address and location information, the nature of the grievance and the resolution desired. Grievance made acknowledged within 48 hours of receipt by an official authorized to receive grievances.
2	Resolution	All grievances referred to the appropriate party for resolution Resolution made within 15 days after receipt of grievance. If additional information is needed, project management can authorize additional 15 days for resolution. Results of grievances disclosed to the griever in writing with an explanation of the basis of the decision.
3	Appeals	Complainants dissatisfied with the response to their grievance may file an appeal.

Step	Category	Activities
		In such cases, the responsible authority assembles a committee to hear cases including at least one disinterested party from outside the agency responsible for the resettlement project. There will be no further redress available outside the resettlement project. In such cases, grievances would need to be pursued through the legal system.
4	Monitoring	During project implementation and for at least 3 months following the conclusion of the project, monthly reports will be prepared by the scheme safeguards officer regarding the number and nature of grievances filed and made available to project management.

Note: The Grievance Redress Committee would be set-up at different levels for project implementation and coordination. GRCs would be established at the community, local government, state and national levels. Members would be responsible for receiving and resolving grievances.

5.5 Grievance Redress Committee (GRC)

An accepted procedure is to establish a grievance committee for displaced populations in project areas. Such committee shall include representatives from the local communities and their leaders. The GRC will hear complaints and facilitate solutions; and the process, as a whole, will promote dispute settlement through mediation to reduce litigation. The main functions of GRC shall include:

- Provision of support to PAPs on problems arising out of eligibility
- Record the grievances of the PAPs, and categorize, prioritize and resolve them within one month;
- Inform SPIU of serious cases within one week; and
- Report to the aggrieved parties about the developments regarding their grievances and decisions of the SPIU, within one month.

The committee shall suggest corrective measures at the field level itself and fix responsibilities for implementation of its decisions. In terms of implementation, all efforts will be made to first resolve the issue faced by PAPs at the field level.

The Grievance Redress Committee stands as a sub-committee within the implementing project. It is established with the aim of addressing the grievances of Affected Persons. The committee functions to look into and address complaints lodged by the victims not only in regards to project related/ service provision issues and concerns but also matters of harassment that may occur within the scope of the project. The Committee ensures that all cases are promptly attended to on receipt of complaints, the committee also reviews all reported cases and acts accordingly in compliance with the stipulated GRM standards and Procedures

5.6 Structure of IMPACT project Grievance Redress Mechanism

A six-step value chain to be carried out are -

1) Uptake;
2) Sort and process;
3) Acknowledge and follow up;
4) Verify, investigate, and act;
5) Monitor and evaluate; and
6) Provide feedback to the complainant has been developed for IMPACT project to manage grievance from the point of receiving to response.

Project-level GMs often have the advantage of being;

(i) Close to the affected community,
(ii) Tailored to the project's expected impacts, and
(iii) Potentially able provide quick resolution.

The Grievance Redress Committee would be set-up at different levels for project implementation and coordination. GRCs would be established at the community, local government, state and national levels. Members would be responsible for receiving and resolving grievances.

For SEA/SH complaints, the person notified of a SEA/SH allegation should immediately provide the survivor with information regarding options for reporting and response, including referral to existing service providers. It is for survivors to decide if they want to report through the grievance mechanism and if they want to access services. If a survivor wants to access services but does not want to file a formal grievance, that decision should be accepted. Survivors should give their consent for each of these steps, according to established response protocols.

The GRM structure, role and responsibilities of the various GRCs and uptake channels are presented below.

Composition, Roles and Responsibilities of the Grievance Redress Committee

Level 1: The Community-Level GRC

This is the first level in the grievance redress process. The **Health Facility** Officers together with the Ward Development Committees (WDCs) would play an important role in the implementation of the Community level GM. Ward Development Committee strengthens local communities through knowledge dissemination of health information with cognizance of socio-cultural context in which health actions are being taken. As member of a GRC, the WDC will engage adequately with their communities and are closet in terms of receiving grievances.

The Community Based GRC will coordinate all grievances that are received at the community level and liaise with the SPIU GM Focal Points for grievances that need to be resolved at the state level; they will collate, investigate and resolve grievances within their capacity. The SPIU GR Focal person will work closely with the group.

Membership in this role would be entirely voluntary and they would be trained by the State level Social Safeguard Officer.

The NMEP will use the same structure as the NPHCDA. An existing community structures such as WDC, Women/youth groups and other Associations in the community.

The Health Facilities shall serve as the implementation point for the NPHCDA Implementing.Therefore, the GRM FP who is a member of the Community Level GRC shall be selected from the implementing Health Facilities. **The Focal Person appointed should preferably be a woman.**

Membership of the community based GRC

- Committee Chair (Existing WDC Chairman)
- Focal Person (Staff of Health Facility)
- Secretary (Headmaster from the community school)
- PRO official (Woman and Youth Representative)

Roles and responsibilities of the Community based GRC

- Receive and follow up with complaints of non/delayed feedback by clients
- Settle project related dispute at community level
- Coordinate townhall meetings and other Stakeholder engagements
- Support client complaint escalation requests
- Conduct Regular sensitization of community members and patients of the HF on the GRM process

Roles and Responsibilities of the Community Grievance Redress Chairman

- Calls for monthly meetings, guides and presides over it.

- Ensures the committee functions properly and there is full participation of members of the committee during meetings.
- The head of committee establish that all relevant matters are discussed during meeting and effective decisions are made including GRM issues.
- In addition, he/she manages and coordinates all GRM issues brought before the committee as well as ensuring feedback to the complainants.

Roles and responsibilities of the Community Grievance Redress Focal Persons

- Be the main support for the GRM at community level.
- Receive training from SPIU Grievance Focal Person on roles and responsibilities.
- Register complaints in agreed Format
- Be responsible for the Complaint Box and ensure that Complaint Forms are always available.
- Promptly call the complaint in to the SPIU Grievance Focal Person directly in the case of SEA/SH cases as soon as the incident is known.
- Refer SEA/SH survivors to support services available in the community, based on his/her consent, as per the GBV referral pathway detailed below and follow up with GBV cases, all while maintaining confidentiality to protect the survivor and remaining in close contact with the SPIU.
- Enter the information into the incident intake form while maintaining the reporting protocol.
- Refer the allegation to needed assistance including GBV Service Providers and to NPIU GBV Consultant.
- Sensitize communities on the available SEA/SH and GBV services referral pathway.
- Ensure proper feedback is provided to complainants.
- Operate dedicated telephone hotline(s) for complaints

Roles and responsibilities of the community based GRC Secretary

- Manage day to day operations of the GRC in project beneficiary community
- Arrange and partake in Grievance Resolution Sessions
- Provide monthly/quarterly report on complaint to the SPIU through the social safeguard specialist
- Facilitate pasting of posters, distribution of brochures and other information dissemination materials in communities

Roles and Responsibilities of the Community Based PRO

- Conduct community Sensitization activities for GRM and inform communities on available SEA/SH service referral pathway
- Support in the dissemination of materials to the Communities
- Identifies and directs/accompany complainants to the GRM FP for lodging, Receipt and Recording of Complaints

It is noteworthy that the IMPACT Project have constituted the GRC across the PHCs for the intervention works.

<u>Level 2: The LGHA Grievance Redress Committee</u>

A Grievance Redress Committee shall be established within each LGHA chaired by the LGHA PHC Management Committee Chairman:

- Chairman Committee (Chair PHC management Committee Meeting)
- Secretary (LGHA PHC coordinator)
- LGHA GRM FP (Social Mobilization Officer)

- M&E Officer

The GRC at this level will be responsible for the following activities:

- Present and discuss data from GRM implementation process, and review the effectiveness of the GRM strategy, and assess adherence to previous decisions of the committee
- To review and address complaints referred/escalated to it by stakeholders, identify/review/address the reasons they were escalated and provide feedback to the client through the LGHA GRM committee
- Ensures the Review of facility adherence to GRM implementation guidelines during ISS and Quality verification, especially as regards conformity to resolution timelines.
- Ensures the Analysis of LGHA complaint pattern and presentation is made to the LGHA PHC Management committee.
- Ensures the Review and resolution of complaints or escalate to higher level.

Ensures that a summary report is provided to the LGHA PHC Management Committee on efficiency/effectiveness of GRM process.

Responsibilities of the CHAIRMAN COMMITTEE (Chair Steering Committee Meeting)

- Chairs and manages the committee ensuring the committee functions with full participation of its members
- Ensure that referred escalated complaints are addressed and feedback provided to affected persons or institutions.
- Ensure unresolved grievances are escalated to the State Steering Committee.

Responsibility of the Secretary (LGHA PHC coordinator)

- Document's happenings and decisions taken during meetings.
- Ensures the review of summary reports on GRM.
- Maintain effective record on GRM.

Roles and Responsibilities of LGHA GM FP

- Receive and Register Complaints
- Sort and segregate complaints according to eligibility and priority
- Inform complainant on receipt of complaint, provide feedback to complainant
- Ensures the Review and resolution of complaints or escalate to higher level.
- Completes the monthly summary sheet and develops a quarterly summary report on GRM which will be presented at the Quarterly Steering Committee meeting.
- Disseminate monthly summary sheet and monthly summary report to State Communication officer GRM FP

Roles and responsibilities of the M&E Officer of the LGHA

- Supports in the management of GRM information, updates, and analysis.
- Disseminate overall GRM findings to relevant Stakeholders (at all levels)

<u>Level 3: The SPIU Grievance Redress Committee</u>

A Grievance Redress Committee shall be established within each SPIU, chaired by the State Project Manager. This group will receive grievances from various channels including the State hotline, and will liaise with other state officers in investigating and resolving or referring grievances. Further investigations on grievances brought forward by the Community level GRC would be handled at this level. The State level Social Safeguard Officer will ensure that the Community level and LGHA GRCs are adequately trained on the content of the GRM manual, complaints types, etc., to enable them distinguish complaints accordingly and take necessary actions for referral or resolution. The SPIU GRCs also ensure that training is cascaded to the beneficiaries at the community levels. The essence is to ensure that beneficiaries are aware of the GRM and various channels open to them for registering grievances.

It is also important to note that beneficiaries can also directly complain to the SPIU GRC or any other IMPACT Project staff if they do not feel comfortable doing that at the community or LGHA levels.
The Committee comprises of:

- State Project Coordinator (Chairman)
- Social Safeguard Officer (Focal Point)
- Environmental Safeguards Officer
- Behavioral Change Officer
- Project Account Officer
- M&E Officer
- Legal Officer

The SPIU GRC shall be responsible for:

- Coordinating the entire grievance mechanism at the state level.
- Resolving disputes that are within their power or control.
- Making recommendations for action to the GRC at the NPIU in the case of issues of extreme importance or urgency.
- Provide adequate resources to offset operational administrative costs of the community based GRCs. The GRM focal persons (FP)s at this level should send monthly reports to the GRM FPs at the Federal level.

Responsibilities of the State Project Coordinator:

- Ensures proper coordination between State and LGHA Implementing entities.
- Provides support in the implementation of GRM approach in participating State
- Address grievance that could hinder project implementation at State level.

Responsibilities of the SPIU Social Safeguard Officer include:

- Administration of the GRM at the state level
- Registration of grievances and grievance logbook keeping
- Direct support to the community based GRCs
- Monthly report on the status of disputes to NPIU and World Bank using approved formats
- Documentation of the SPIU GRC proceedings, decisions, and recommendation
- Coordination of the grievance uptake points and beneficiary feedback, ensuring that they are adequately resourced
- Liaise with community based GRC to track and record complaint and resolution reached
- Liaise with the Citizens' Rights/Mediation Centres in the project states, for possible referral of unresolved grievances and tracking of reported complaints
- Facilitating arrangements for field inspections
- Handling all payments and expenses related to GRM operations

- Providing feedback to affected persons
- Planning and execution of any needed trainings including sensitization about the GM at community level, procedures, and mechanisms for reporting allegations of Sexual Exploitation and Abuse (SEA) targeting Community Grievance Focal Persons, partners, recipients of assistance, and local communities.
- Ensuring Complaint Boxes and Complaint Forms are continuously available at the communities.
- Collecting Complaint Forms from Complaint Boxes and/or receiving Complaint Forms directly from Community Grievance Focal Person (or other) and logging them into the GRM module.
- Determining the appropriate responses (in line with guidelines).
- Promptly call the complaint in to the NPIU GBV Specialist as soon as the incident is known.
- Refer SEA/SH complaints urgently to relevant authority(s) using the appropriate referral systems, when necessary. The SPIU Social Safeguard Officer should always act quickly on serious complaints and closely follow with relevant agencies to ensure they are addressed.
- Ensure proper feedback is provided to complainants in cooperation with Community Level Grievance Focal Persons.

Summary of functions: The Social Safeguard Officer registers the grievance and may resolve same if it is within his/her influence to do so, otherwise an expanded meeting of the SPIU GRC is convened, with the advisory input of the State Project Coordinator.

Grievances in the category of SEA/SH shall be referred appropriately to pre-identified qualified service providers, depending on the preference of the survivor.

The SPIU GRC shall finalise mediation on grievances referred or reported directly to it within 10 days and provide feedback to the complainant. In SEA/SH related disputes, the complainant/survivals confidentiality should also be kept in mind when reporting any incidences to the police or service provider.

If disputes cannot be resolve by the SPIU GRC, the case will be referred to the NPIU GRC within 5 days.

Responsibilities of the State Environmental Safeguard Officer:

- Report all Project Environmental related issues that may arise to the Social Safeguard officer
- Support in determining the appropriate responses, where it involves environmental health issues affecting the beneficiaries within the Scope of the project

Responsibilities of the State Behavioural Change Officer:

- Support in the development of Communication Strategies and Communication Materials
- Publicize GRM channels, structure and other project communication strategies to ensure awareness.
- Manage of Social Platform/Media activity of the GRM Component at state level.
- Support in awareness creation/ sensitization of GRM matters

Responsibilities of the State project Accountant:

- Handling all payments and expenses related to GM
- Partake in handling of grievances that relates to project fund management

Responsibilities of the State M&E Officer:

- Supports in the management of GRM information, updates, and analysis.
- Support in GRM Monitoring and Evaluation Task
- Disseminate overall GRM findings to relevant Stakeholders (at all levels)

- Coordinate with the National M&E officer to ensure accurate and timely reporting of GRM M&E activities.

Responsibilities of the State Legal Officer:

- Advices on GM legal issues and alternative dispute resolution methods

Level 4: The NPIU Grievance Redress Committee

The NPIU GRC shall be the 4th tier of appeal. The NPIU GM FPs will head the GM for IMPACT Project. The Social Safeguard Officer will liaise with officers in other departments and at State and LGHA levels in resolving grievances.
Beneficiaries may also call the IMPACT GM hotline at national level with any type of grievance. Complaints received at NPIU level will be resolved by liaising with the relevant staff at State, LGHA and Community level, depending on what the issue is, to investigate and resolve the grievance.
Serious grievances that cannot be handled or resolved at the community, LGHA or State levels will be resolved at Federal level.
Issues relating to staff misconduct or corruption related grievances should be made directly to the NPIU GRM FP who will forward those grievances to the National Project Manager (NPM) for further action/directives. The NPIU GM FP will provide feedback to the complainants on the outcome of the investigation.
The main roles of the NPIU GRC are to allow:

- Affected parties, who are unhappy with how their complaint has been handled by the first, second and third tiers GRCs to appeal to fourth tier GRC, and
- Feedback or issues that has not been handled by and filed directly to the SSO, Community based GRCs, LGHA GRCs and SPIU GRCs.

The NPIU GRC shall consist of the following members:

- The National Project Manager or his representative
- NPIU Social Safeguard Officer (Focal Person)
- NPIU Environmental Safeguard Officer
- NPIU GBV Specialist
- Head of Procurement or a nominee
- NPIU Behavioral Change Officer
- NPIU Accountant
- NPIU Legal Officer

This committee shall receive monthly reports on status of disputes/complaints from the NPIU GRC and shall provide approvals or guidance on action items in the report.

If disputes cannot be resolve by the NPIU GRC, the affected or interested party will be advised to peruse the case in a court.

Responsibilities of the National Project Manager:

- Ensure the development of GRM document for Implementation
- Ensures proper coordination between National, LGA and State Implementing entities.
- Chairs and manages the committee ensuring that it functions properly, with full attendance of relevant stakeholders.
- Provides Technical guidance to the GRM implementation
- Ensures that escalated grievances are resolved.
- Provide support in the roll out of GRM approach in implementing States.
- Receive reports on GRM activities.

The Social Specialist at the NPIU will be responsible for

- Constant interactions with the SPIU GM FPs in handling grievances received.
- Responsible for training the SPIU, LGHA and HF GRCs, on handling and managing grievances and any other training required for the GM.
- Coordinating with the GBV Specialist in the implementation of a GBV-GM.
- Ensure proper feedback is provided to complainants.
- Review reports provided by the SPIU and produce a quarterly report for Bank team.
- Support in the development of the GM documents
- Support in the Development of Activity Plan and Monitoring Indicators
- Keep record of escalated grievance at National level
- Operate dedicated phone for grievance
- Track and keep record of complaints including resolutions
- Coordinate Grievance uptake channels ensuring they are adequately resourced
- Ensure that GM channels, structure and other project communication strategies are available to ensure awareness.
- Ensure feedback is provided to affected persons
- Ensuring meetings are effectively organized and outcome, discussions are documented.
- Develop timetable for GM process implementation
- Ensure the review of GM reports from implementing States.

The GBV Specialist at the NPIU will be responsible for:

- Monitoring the overall system and the status of complaints resolution in their respective program.
- Weekly monitoring of the Grievance Registers and providing responses to complex complaints which cannot be resolved at the State and Community levels.
- Coordinating with relevant agencies to ensure that serious complaints are resolved in a timely fashion.
- Coordinate with relevant finance departments to ensure resource availability for backstopping activities, including working with the Service Providers, put in place an NGO to backstop responses to SEA/SH, as necessary; and ensure funds are available at SPIU Level.
- Promptly notify and provide information about an incident (GBV) to the WB as well as further details as they become available as needed (as per the incident classification guide in the ESIRT).
- Ensure proper feedback is provided to complainants.

Responsibilities of the National Environmental Safeguard Officer:

- Report all project related Environmental issues that may arise to the Social Safeguard officer
- Support in determining the appropriate responses, where it involves environmental health issues affecting the beneficiaries within the Scope of the project

Responsibilities of the National Behavioural Change Officer:

- Support in the development of Communication Strategies and Communication Materials
- Publicize GRM channels, structure and other project communication strategies to ensure awareness.
- Manage of Social Platform/Media activity of the GRM Component at state level.
- Support in awareness creation/ sensitization of GRM matters

Responsibilities of the National Project Accountant:

- Handling all payments and expenses related to GRM
- Partake in handling of grievances that relates to project fund management

Responsibilities of the National level M&E Officer:

- Supports in the management of GRM information, updates, and analysis.
- Support in GRM Monitoring and Evaluation Task
- Disseminate overall GRM findings to relevant Stakeholders (at all levels)

Responsibilities of the National Legal Officer:

- Advices on GRM legal issues and alternative dispute resolution methods

5.7 Procedure for Resolving Grievances under the IMPACT GM

All staff of IMPACT Project have a role to play in the GRM, whether it is by intaking or managing complaints as members of the GRC or by supporting GRC with the investigation and response to received grievances.

5.7.1 Structure of Grievance Redress Escalation Process

A sequence of five levels will be prepared to give the complainant/affected person easy access to grievance redress. Complaints may also be escalated by individuals who are unsatisfied with the resolution process/results, or who believe the acceptable timelines for resolution have been exceeded. The levels are outlined as follows:

First Level: Dissatisfied Project Affected Person - The first step of this procedure is for the aggrieved person to make a complaint to the Community level/Health facility GRC through the various channels for reporting grievances. Efforts will be made to resolve all grievances/complaints at this level.

Second Level: Intervention by Local Government Area Health Authority/Hospitals Management Boards (HMB) - In cases where complaints are unresolved by the Health Facility GRC or the complainant is unsatisfied with the resolution at the First level, the complaint can be escalated to the LGHA/HMB. The complainant will be notified on this action and the FP/Complainant will follow up with the LGHA/HMB.

Third Level: **Intervention by the State Project Implementation Unit (SPIU)** The LGHA/HMB will similarly escalate complaints to the GRC at the SPIU if complaints are unresolved or the complainant is unsatisfied with the resolution reached at the second level.

Fourth Level: Intervention by the National Project Implementation Unit (NPIU) If complaints are unresolved at the third level, this will be escalated to the GRC at the NPIU

Fifth Level: Reference to Court of Competent Jurisdiction - Upon exhaustion of efforts by the HF GRC, LGHA/HMB GRC, SPIU and NPIU GRC levels, the complainant will be advised to seek legal redress in a court of competent jurisdiction. This shall as much as possible be avoided, and only resorted to as last option. If the aggrieved person is unsatisfied with the resolution reached upon exhaustion of all available avenues for settlement, he/she would be advised to seek legal redress at the court of law. Referral to a law court should ordinarily be done after a case has been referred to NPIU GRC and is still without resolution, but it should be noted that the complainant reserves the right to choose their own preferred legal method of redress at any point.

At each point, feedback must be provided to the client by the FP at the level at which the complaint has been escalated, with clear information on the expected timeline for resolution.

5.7.2 Grievance redress procedure

The step-by-step GRM procedure to be utilized by the Project is provided in figure 2 below:

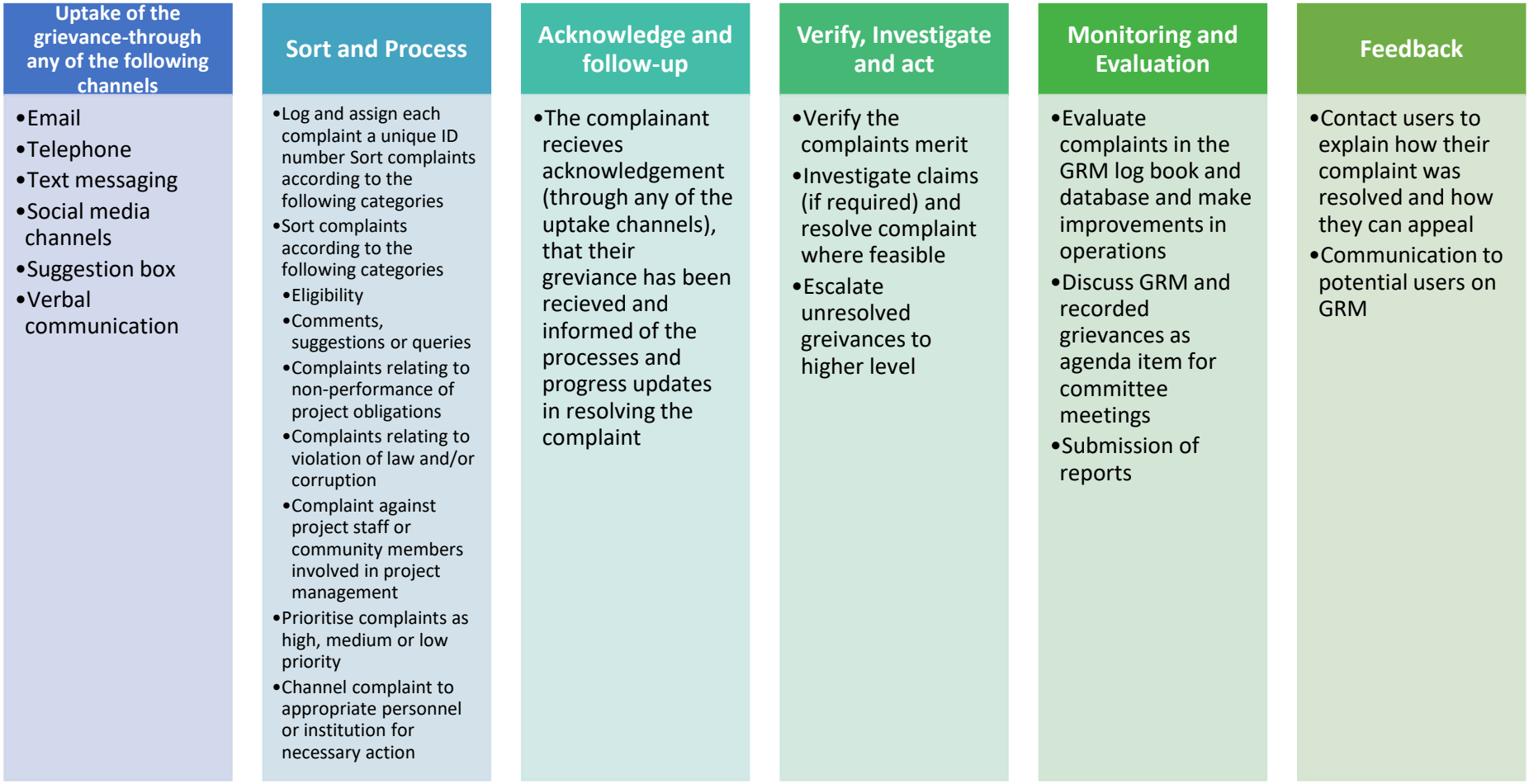


Figure 2: Grievance redresses procedure for IMPACT

This GRM procedure and channels will be applied at all levels

5.7.3 Lodging/Receiving Grievances

Grievances can be lodge through any of the following channels: in-person, through the use of suggestion box available at the health facilities, via dedicated phonelines, E-mail, text messaging, social media channels.

It is anticipated that majority of the grievances under the IMPACT will be lodged at the health facility level. This section of the report describes the process for receiving and resolving grievances. Where grievances are unresolved at the HF level, the GRM Focal Person will escalate the issue to the next level while providing information to the aggrieved person on the process.

Clients may present their grievances following utilization of a service at the Health Facility, or upon receipt of negative feedback on facility procedures from friends and family who have utilized the facility services, through any of the uptake channels as specified in figure 2. The GRM FP will ensure confidentiality of the complaints process.

For grievances lodged in person, the GRM FP will provide the client with a complaints form and a conducive location in which to fill in their complaints. The FP will assist those who are unable to write during the form filling process.

All grievances lodged, irrespective of the channel of receipt will be recorded in the GRM logbook by the GRM FP.

All complaints especially those of sensitive nature such as GBV complaints can be made directly to the IMPACT GRM hotlines if the complainant doesn't feel comfortable lodging the complaint at community or LGHA levels. In cases where complainants do not have access to a network or phone to call the hotline, they can ask a family member or friend who owns a phone and lives within a network range to make the complaint on their behalf.

5.7.3.1 Lodging Anonymous Complaints

Anonymous complaints are welcome; no one should be required to give their name or contact information if they do not wish to. However, if the complainant wants to receive a response, they will need to leave some basic contact details such as an address, telephone number, or email. Anyone complaining anonymously should be encouraged to provide as much information as possible to enable effective investigation and resolution of complaints.

5.7.3.2 Addressing complaints related to GBV and SEA/SH

The IMPACT GRM takes complaints related to gender-based violence (GBV) and sexual exploitation or abuse/sexual harassment (SEA/SH) seriously.

Within the context of the project:

- SEA complaints may involve project staff or Service Provider, for example where a staff member or Service Provider abuses their position of power to target a beneficiary or community member for sexual purposes. SEA complaints may also involve community members, for example where a beneficiary experiences sexual abuse while traveling to receive their benefits.
- SH may occur between personnel/staff of the Project and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature (e.g., a staff member or contractor sexually harasses another staff member or contractor).
- Separately from SEA/SH, GRM Focal Person may encounter GBV complaints from beneficiaries that are not perpetrated by a project actor, for example complaints of Intimate Partner Violence (IPV) within a beneficiary household that relates to the use or control of project benefits or complaints about domestic conflicts.

To fulfill the role of addressing SEA/SH risks all staff and volunteers at all levels should be trained (and/or have previous knowledge and experience) on the GBV Guiding Principles and the specialized procedures for receiving and referring GBV-related complaints. This set of skills will help GRM staff to support the quality of the complaint mechanism, while at the same time ensuring the adherence to these Guiding Principles and a survivor-centered approach, including right to safety, respect, and confidentiality, of the complaint intake and management. Hotline operators should receive training on the handling of GBV-related complaints in line with the principles of confidentiality and the specialized procedures.

When receiving a grievance/during the intake process, the person receiving the complaint shall respect the wishes, choices, rights, and dignity of the survivor. In the case of these types of complaints, if a survivor chooses not to be referred or have the project take further action, the focal persons must seek their consent to share basic monitoring data. In order for the survivor to consent to file a complaint, he/she needs to be provided with clear and simple information on the functioning of the system, on the possible outcomes, and what the timelines are, on what type of support can be provided, etc. to be able to make an informed choice. For GBV cases, it is important to ensure that access to the complaints processes is as easy and as safe as possible for the survivor and that they clearly understand the referral process.

5.8 Grievance Uptake

Persons affected by the Project can make complaints through one of the following approaches:

- **Verbal communication**: this can be done with the identified GRM Focal Point, Officer in-charge (OIC) or any member of the GRC.
- **Use of suggestion box**: Suggestion boxes are available in most health facilities or will be mounted where not available. Community members will be sensitized on the usage of suggestion box as a channel for receiving grievance, especially if one intends to make an anonymous complaint. This will be a rectangular box with a Pigeonhole for inserting complaints and a lockable cover for emptying, the key to the box will be held by the GRM FP, with the facility Office In-charge (OIC) having a spare key. The contents of complaints box shall be checked on daily basis by the GRM FP and any member of the GRC to retrieve complaints forms for necessary update of the GRM logbook. Whenever the complaint box will be emptied, a member of the GRC should be available.
- **GRM Complaints Form**: A grievance complaint form shall be available at the Health Facility (see annex 1). The Complainant will be given the opportunity to documents their complaints in the form. Where they are unable to fill the form, a staff of the facility or any other person of their choice who will provide support. Alternatively, the complainant will be given the option of verbal representation of complaints.
- **Telephone/text messaging/Email**: Each health facility is equipped with a phone line with constant operational readiness. The community members will be sensitized on the use of the phone lines to drop any complaints regarding services provided. The phone line will also facilitate communication between the complainant and the GRM FP. All complaints shall be recorded and transmitted to the appropriate channel for tracking and proper documentation.
- **Social media channels** Such as: The Social media Handles (Twitter, Facebook, WhatsApp, Instagram) also inclusive is the Electronic Media (TV, Radio) and Print Media (Newspapers, Posters, Leaflets).

Mode of receipt and recording Complaints

The step for receiving and recording complaints are highlighted below

- The complaints shall be made mostly verbally or in writing, or submitted in complaint boxes in each location.
- The officer receiving the complaints obtains relevant basic information regarding the grievance.
- The two points of receiving complaints as illustrated above shall be in possession of a standardized complaint receiving form provided by the project, which must be filled in for every complaint including complaint boxes.
- As soon as a complaint is received, an acknowledgement form shall be issued to the complainant.
- After registering the complaint, the Grievance Redress Committee (GRC) under the guidance of the chairperson shall set a date to investigate the matter;
- After which they shall provide a recommendation. If necessary, the concerned officer will convene a meeting between the parties involved to find a solution to the problem and make arrangements for resolution. The deliberations of the meetings and decisions taken are recorded

Timeline for resolution at Community

Table 21: Timeline for resolution at Community

S/N	ACTIVITY	TIME LINE
1	Acknowledgement of Receipt of Grievance following Resolution or Non-Resolution	Within 48 hours
2	Commencement of investigation after receipt of complaints	Within 48 hours
3	High priority Grievances	24 hours to 7 days
4	Medium /low priority Grievances	Within 28 days
5	Window period for resolving complaints	24 hours to 28 days
6	Feedback to complainant after complaints have been made	24 hours to 28 days
7	Informing complainant with ineligible complaints of the status of their complaint	24 to 48 hours
8	Update of log books	Regularly
9	Submission of HF Grievance complaints summary sheet to LGHA/HMB	Monthly
10	Submission of Reports by LGHA/HMB to SPIU GRC	Monthly
11	Submission of Reports by SPIU GRC to NPIU GRC	Monthly
12	Submissions of Reports by NPIU GRC to WB	Monthly

5.9 Management of Reported Grievances

The procedure for managing grievances should be as follows:

a) The affected person shall file his/her grievance, relating to any issue associated with the resettlement process or compensation, in writing or phone to the RCC (Phone numbers will be provided by the SPIU). Where it is written, the grievance note shall be signed and dated by the aggrieved person. Where it is via phone call, the receiver must document every detail.
b) The SPIU social and environmental officer will be the direct liaison with PAPs in collaboration with the CBOs or representative and SPIU project site office to ensure objectivity in the grievance process.
c) Where the affected person is unable to write, the SPIU site level safeguards officer will write the note on the aggrieved person's behalf and duly thumb printed by the complainant.
d) Any informal grievances will also be documented

5.10 Monitoring Complaints

The SPIU safeguards officer will be responsible for:

- Providing the grievance Committee with a weekly report detailing the number and status of complaints
- Any outstanding issues to be addressed
- Monthly reports, including analysis of the type of complaints, levels of complaints, actions to reduce complaints and initiator of such action.

5.11 Focal Points to Receive Complaints

The following channels will be available for grievance uptake:

- In-person to the grievance redress committee (GRC) focal persons:
- During meetings organized by the community GRC (with participation of the aggrieved person and stakeholders)
- Use of complaint box
- Letter addressed to the GRC at the Community and SPIU levels
- Telephone hotlines
- Toll-Free lines
- Dedicated GM Email
- SMS (regular or short code SMS)
- Dedicated Mobile Applications
- Any other suitable channels to be recommended in future based on further citizen's engagement activities

CHAPTER 6: BUDGET AND FINANCING PLAN

6.1 Introduction

This section provides information on the estimated budget and sources of fund for the overall implementation of this RAP. In budgeting, the following were taken into consideration:

- Sufficient budget for resettlement, and its inclusion in the overall project budget.
- Resettlement costs, if any, to be funded by the IMPACT Project and the mechanisms that will be established to ensure coordination of disbursements with the RAP and the project schedule.
- Estimated budget, by cost and by item, for all resettlement costs including planning and implementation, management and administration, monitoring and evaluation, and contingencies.

A detailed inventory of all affected assets and PAPs was carried out to give the basis for estimating the compensation costs. Information on the estimated budget for the overall implementation of this RAP and Source of funds are provided in this Section.

6.2 Financing plan

Compensation budget for this RAP implementation is to be fully funded by the IMPACT Project and shall be disbursed from the project counterpart fund account. Since IMPACT Project under the National Primary Health Care Development Agency is the one impacting livelihoods, it is their responsibility to fund the RAP budget. Detail of compensation for each asset is found in Annex A. It is expected that implementation function will rest on the SPIU, but the budget and the entire RAP Report will however be subject to the clearance/approval by the World Bank, finalization of disclosure before disbursement or implementation can commence. Before any activity of Construction works is implemented, PAPs will need to be compensated in accordance with this RAP. The funding for this RAP shall be deposited in a separate account dedicated for payment of compensations and resettlement assistance. Separate financial record shall be kept, and the record shall show payments by line items as stated in the RAP budget.

6.2.1 RAP Budget

The estimated cost for implementation of the RAP is Twenty-Seven Million, and Seventy-three Thousand Naira **(₦ 27,073,000.00**) (Eighteen Thousand, Five Hundred and Two Dollars, Twenty-two Cents – **$ 18,502.22**)as shown in Table 21

Table 22: RAP Budget

SN	Item	Amount	
	COMPENSATION COST	**₦**	**USD**
A	Full Replacement cost for Loss of Asset	2,820,000	1,927.24
	Business Disturbance	2,500,000	1,708.55
	Disturbance/Relocation	240,000	164.02
	Vulnerability Adjustment Support	500,000	341.71
	Livelihood Restoration Support Program for Vulnerability (LRSP)	4,370,000	2,986.54
	Sub - Total	**10,430,000**	**7,128.07**
B	**Resettlement Implementation Cost**		
	Cost for Psychosocial Support Officer/Case Worker (6 Months period) – Lump Sum	1,800,000.00	1,230.16

SN	Item	Amount	
	Capacity Building & Training/institutional strengthening including training for traders	8,000,000.00	5,467.36
	GRM Management/Implementation	2,000,000.00	1,366.84
	Consultations and Monitoring	1,800,000.00	1,230.16
	Disclosure	2,000,000.00	1,366.84
	Sub-Total	**15,600,000.00**	**10,661.35**
	Contingency (10% of RAP compensation cost (A))	1,043,000.00	712.81
	GRAND TOTAL	**27,073,000.00**	**18,502.22**

USD 1 = NGN 1,463.23[7] as at 15th October, 2025. This exchange rate may change before implementation

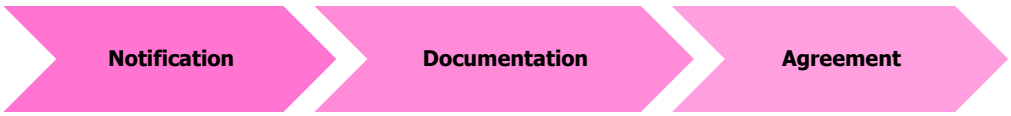
[7] www.ngnrates.com

6.3 Procedure for Delivering of Entitlements

In line with the World Bank's OP4.12, the basis of what the PAPs are to be compensated with was determined. The entitlement matrix in this RAP was designed to assist the process by bridging the gaps between requirements under Nigeria Law and the World Bank OP4.12. Under OP 4.12, in case of differences, OP 4.12 will prevail. The entitlement matrix, which forms the basis for compensation budget, gives the procedure for delivering of entitlement.

6.4 RAP Compensation Process

Compensation payment will follow these outlined steps:



6.4.1 Notification

The community members were notified about the established cut-off date and its significance. This message was delivered by the RAP consultant in the presence of the PAPs, community leaders land owners and other interested parties. They were charged with the responsibility of further spreading the message to other community members.

6.4.2 Documentation

A compensation dossier shall be completed for each household affected, which will contain necessary personal information, inventory of assets affected, types of compensation and information for monitoring their future situation.

6.4.3 Agreement

Agreements shall be prepared by the RAP consultant and signed and witnessed before the SPIU. The compensation contract and the grievance redress mechanisms shall be read aloud in the presence of the affected party, representatives of the SPIU and community leaders prior to signing.

6.4 Compensation Payment Administration

Disbursement shall be carried out in line with the projects' administrative and financial management rules and manuals. Bank accounts shall be opened for eligible PAPs and cash paid into their accounts by the Resettlement Implementation Committee (RIC). The RAP consultant and the RIC shall ascertain the identity of the PAP before being approved for payment by the Project Coordinator. An escrow account shall be set up by the project for a period of six months for payment of future claims of PAPs. Non-Governmental organizations will be involved in monitoring the compensation procedures.

In general, the procedure for delivery of compensation shall include:

- Full payment of compensation carried out before possession of acquired sites formally making offers to affected persons and allowing persons to accept or reject offer, offer a counter claim and seek redress under the grievance procedures established.
- Implementation committee communicates the amount to be paid to the PAPs. Bank Issuer cheques issued to individual PAPs is the preferred and first mode of payment. SPIU shall make arrangements with nearest bank to effect payments without any challenge to the PAPs. This will include account opening for PAPs that do not have bank accounts.
- Necessary document of payments to the affected persons shall be presented to local land/Asset Valuation Committee from the local government and/or other independent witness of the affected person and leaders of the communities.
- Proper receipts issued, and copies given to the affected person by the SPIU.
- Comprehensive reports on payment made submitted for review by SPIU.

6.5 Resettlement Implementation Linkage to Civil Works

Before any civil work commences, PAPs must have received full compensation/resettled in accordance with the entitlement matrix/budget plan established in this RAP. Only after the RAP has been

implemented and RAP implementation completion report sent to the Bank for clearance while the SPIU or their contractor mobilize to the sites for civil works activities.

CHAPTER 7: INSTITUTIONAL ARRANGEMENTS- ROLES AND RESPONSIBILITIES

7.1 Actors Involved and Organizational Structure

This section highlights relevant institutions through which the planning and implementation of the RAP for the project will be conducted. Several institutions were identified and consulted and will be involved in the overall implementation of this RAP.

These include:

(a) The World Bank
(b) Federal Level (Federal Ministry of Environment);
(c) Federal Project Management Unit (FPMU)
(d) State Project Implementation Unit (SPIU)
(e) All the Affected LGAs; and
(f) Chiefdoms and Kingdoms

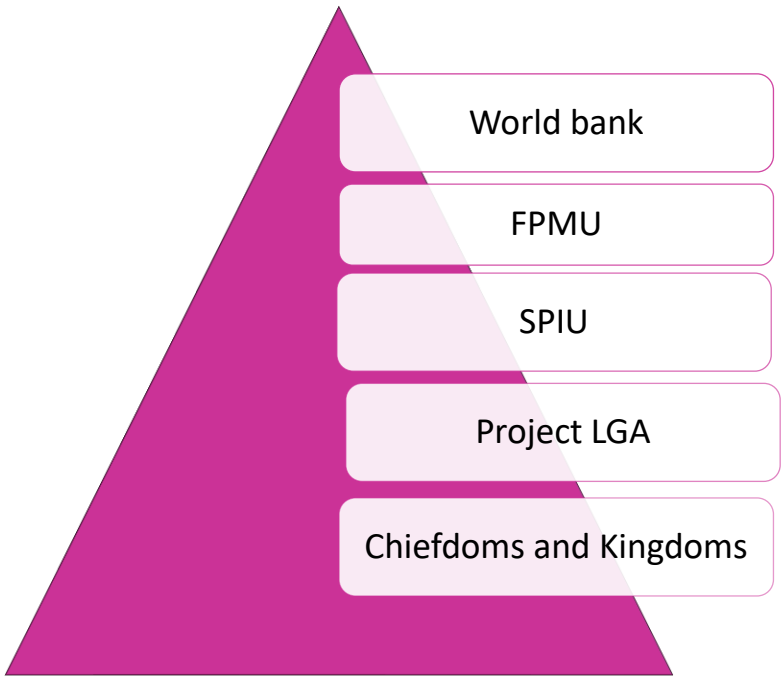


Figure 3:Organizational Chart that Shows the Relationship among the Various Organizations Described

The roles and responsibilities of the institutions regarding Resettlement Implementation and Grievance redress is summarized below.

7.1.1 The World Bank

- Maintains an oversight role to ensure compliance with ESF requirements, review and provide clearance and approval for the RAP.
- Conduct regular supervision for satisfactory RAP implementation and provide support throughout the project implementation and monitor the progress of the project construction.
- Recommend additional measures for strengthening the management framework and implementation performance.
- In case the WB considers the implementation to be not acceptable and no improvements can be expected, it will require that institutional capacity building measures be taken to strengthen the SPIU.

7.1.2 Federal Level

Federal Ministry of Environment-EA Department (FMEnv)

i. Lead coordinating agency and hosts the Federal Project Management Unit (FPMU).

ii. Review and issue circular for disclosure of RAP
iii. Certification

Federal Project Management Unit (FPMU)

- Provides an oversight and advisory role in overall project management including resettlement planning and implementation
- Establishes and maintains the project management systems
- Reinforces State level structures
- Supervises through missions

7.1.3 State Level

State Project Implementation Unit (SPIU)

The SPIU, as the implementing authority, headed by Project Coordinator (PC) & authorized to take decision on financial matters within the provided budget, has the mandate to:

- Develop and implement RAPs and other safeguard instruments.
- Drives activities of procurement, capacity building, service-provider mobilization, and monitoring and coordinating the many participating MDAs at State and Local Government levels.
- Study in detail the RAP, and based on the review of the RAP prepare a detailed action plan and timetable for the day-to-day RAP implementation.
- Organize the necessary training and capacity building measures for the unit itself and for other partner organizations and committees.
- Establish all local level institutions and committees which will participate in the implementation of the RAP and provide them with the necessary training and capacity building measures.
- Coordinates and undertake compensation activities in accordance with the principles and procedures specified in the RAP
- Implement the income restoration and social development programs and project in accordance with the principles and procedures specified in the RAP.
- Ensure the systematic undertaking of monitoring, review and evaluation of the RAP in accordance with the framework and guidelines provided in the RAP and store the data and information collected in a data base.
- Based on the findings of the monitoring and review take corrective actions and submit monitoring and review reports to the relevant higher bodies for timely corrective measure.
- Facilitate the discussion between PAPs and communities regarding compensation for land acquired for the projects.
- Implement the RAP including their involvement to redress complaints and internal monitoring.
- Cooperate through a Steering Committee that provides guidance to the technical aspects of all project activities.
- Maintain and manage all funds effectively and efficiently for the projects
- Organize the necessary orientation and training for SPIU officials so that they can carry out consultations with communities, support communities in carrying out RAPs and implement the payment of compensation and other measures (relocation and rehabilitation entitlement) to PAPs in a timely manner.
- Ensure that progress reports are submitted to the World Bank regularly

SPIU Social Safeguard Officer

- Initiate Implementation of Resettlement Action Plan (whenever the project involves displacement of homes, farmlands or businesses).
- Review and approve Contractor's Implementation Plan for the social impact measures as per the RAP
- Liaise with the Contractors and the SPIU on implementation of the RAP and prepare RAP implementation report.
- Coordinate on behalf of SPIU day to day activities with the relevant line departments and oversee the implementation of RAP instrument, prepare compliance reports with statutory requirements, etc
- Monitor and regularly supervise the implementation of RAP
- Observe payment of Compensation to PAPs

- Identify and liaise with all relevant Stakeholders pre and post Project implementation
- Sensitization of and Consultations with relevant Stakeholders during and after (where necessary) Project Implementation
- Charged with the responsibility of safeguard requirements and ensuring the sustainability of project.

SPIU Engineer
- Provide technical support

Monitoring & Evaluation Officer/Consultant
- Develop the monitoring and evaluation protocol
- Conduct monitoring of RAP implementation activities
- Provide early alert to redress any potential problems
- Monitor target achievements and slippages.

Resettlement Implementation Committee (RIC)
To ensure a broad representation with the intent of minimizing any conflict, the SPIU shall set up a Resettlement Implementation Committee (RIC). Members of the RIC shall be drawn from amongst the following:

- Affected Local Government Chairman as Chairman
- Physical Planning /land officer
- Representative of affected Communities including women,
- PAPs represented by local trade /Union leaders
- Coordinated by the SPIU (Social Safeguards Officer, Project Accountant, Communications Officer, and Project Engineer). Rep of the Site Committees

Their roles shall include:

- Carry out meeting with each PAP.
- Provide all necessary information to the PAPs regarding guidance value and basis for calculation of prices offered.
- Negotiate and firm up the final consent price.
- Inform the decision for payment of compensation to the PAPs
- Ensure the Implementation of the RAP without any conflict
- Establish dialogue with the affected persons and ensure that the concerns and suggestions are referred to SPIU for appropriate response and management
- All members of RIC must be people who are knowledgeable in the use of local mechanism to settle grievances and who can ensure equity across cases and be in position to know and eliminate nuisance claims and satisfy legitimate claimants at low cost.

Roles and Responsibilities of the Grievance Redress Committee
The following are the roles and responsibilities expected to be executed by the members of the GRC:
- Receiving and registering complaints: The GRC is responsible for receiving and registering any complaints or grievances related to the IMPACT Project.
- Investigating complaints: The GRC is responsible for conducting investigations into complaints or grievances to determine their validity.
- Resolving complaints: The GRC is responsible for resolving complaints or grievances in a fair and timely manner through consultation with relevant stakeholders.
- Providing guidance: The GRC is responsible for providing guidance to complainants on how to file a complaint and the steps involved in the grievance redress process.
- Reporting: The GRC is responsible for reporting on the number and nature of complaints received, investigated, and resolved to relevant stakeholders, including IMPACT Project management and the government.
- Ensuring compliance: The GRC is responsible for ensuring that all parties involved in the grievance redress process comply with the IMPACT Project guidelines, as well as relevant laws and regulations.

7.1.4 Local Level
Local Government

- Coordinates activities at local level during the preparation and implementation of RAPs such as activities for determining the cut-off date and for implementing the resettlement, and for handling any grievances and complaints.
- Responsible for the appraisal of properties affected by the project.
- Provide additional resettlement area and amenities if the designated locations are not adequate.
- Engage and encourage carrying out comprehensive and practical awareness campaign for the proposed project, amongst the various relevant grass roots interest groups.
- Appoint a suitable Desk Officer for RAP information management
- Participating in sensitization of all communities
- Participate in resolving grievances.
- Monitor implementation of projects and activities of Operational Officers.
- Liaises with State PIU
- Convenes and helps mobilize affected communities within and across targeted sub-catchments
- Oversees community facilitators
- Participates in site-committees

Technical Officer in Local Government Areas

- Act as liaison to SPIU, MDAs and other organizations working with communities.
- Provide senior technical skill-set and advisory services to communities and LGAs.
- Convene affected and directly participating communities (liaising with neighboring LGAs as needed).
- Closely interact with community stakeholders and the community facilitators.
- Support site monitoring.

7.1.5 Community Level

Site Committees/ Community Associations

1. Project site oversight.
- Selects livelihood opportunities.
- Oversee physical works.
- Participate in site monitoring.
- Cooperate with neighboring communities and LGAs as needed for trans-boundary sub-catchments.

Traditional Authority

- Support in the identification of the right PAPs
- Assist in resolving grievances of PAPs
- Ensures that social values are not interfered with.

Project Affected Persons

- Receive compensation and move away from impact areas promptly
- Coordinate with the survey team/Resettlement Committee in carefully checking and signing off their affected lands and other assets as well as their entitlements.
- Make themselves available during census and participation in implementation.
- Provide feedback on improving the quality of the RAP and suggesting solutions for its effective implementation and
- Submit concerns through the right grievance redress channel

Independent Witness NGO/CBO/CSO[8]

- Assist in resolving grievances of PAPs
- Support and assist in the mobilization of the various relevant grassroots interest groups.
- May have complaints that need to be resolved in the execution of the project with a view to avoiding conflicts and grievances.
- Serve as witness in compensation process and Monitoring and Evaluation

[8] The Independent Witness NGO shall be engaged by the SPIUs under a separate Contract and to be funded by the IMPACT Project.

7.1.6 Others

Contractors

- Comply with relevant contract clauses on resettlement issues
- Establish good community relations.
- Train the workforce, and avoid any form of discrimination in terms of gender, religion or tribe.
- As much as possible employ the workforce from the project catchment area, and also make procurement therein.
- Try to provide local infrastructure and services in the course of executing the project.
- Ensure that workers and site staff are sensitive to the customs and way of life of the communities.
- Promptly repair any damage to utility services or infrastructure of the community in implementation of the project.
- Verification of selected sites for resettlement and ensuring that such sites are ideally suitable for affected people.
- Ensuring that the project meets with the requirements of resettlement as specified in the report
- Make appropriate recommendation and input in the resettlement process
- Ensuring that affected people are adequately compensated as stated in this report

CHAPTER 8: TIME TABLE OF EVENTS

8.1 Timetable for the Resettlement Action Plan

The schedule for the implementation of activities must be agreed by the Resettlement Implementation Committee, the PAPs and State Project Implementation Unit (SPIU). These should include the target dates for start and completion of all compensation payment before commencement of construction work. The implementation schedule is presented in the table below.

Schedule of Activities:	Start Date	Finish Date	2025				2026		
			9	10	11	12	1	2	3
Cut Off Date	11th September 2025	14th September 2025							
Preparation and submission of RAP Report	October 2025	October 2025							
RAP Review and Approval	October 2025	October 2025							
RAP Disclosure	October 2025	October 2025							
Set up GRC and RIC Training of GRCs and RICs for RAP Implementation	November, 2025	December, 2025							
Field verification and validation of claims, Consultation/Sensitization of PAPs/PAHs	December, 2025	December, 2025							
Notification of Entitlements and agreement on entitlements	December, 2025	December, 2025							
Payment of compensation and in-kind assistance to vulnerable persons	January, 2026	Januasry,2026							
Compensation and resettlement assistance completion exercises	January, 2026	February, 2026							
Submission of compensation and resettlement assistance completion report to the FPMU and the Bank (Internally – SPIU)	February, 2026	February, 2026							

Schedule of Activities:	Start Date	Finish Date	2025				2026		
			9	10	11	12	1	2	3
Commencement of Civil works – demolition and site clearance, upgrade works	February, 2026	February, 2026							
RAP Implementation Monitoring	March, 2026	March, 2026							
RAP Completion and Audit (Externally – Consultant)	March, 2026	March, 2026							

8.2 Training and Capacity Needs

The implementation of this RAP shall require that personnel and stakeholders possess the appropriate capacity. During the public consultation, capacity assessment of the PAPs and community representatives were assessed in the area of community conflict/Grievance Redress and RAP process. The effective functioning of the above mentioned is compromised by limited knowledge on the RAP process. Also, the capacity of the SPIU team was assessed during the field work to identify their ability to implement the RAP, carryout Monitoring of Livelihood improvement program as well as Grievance and conflict Redress arising from the project implementation. Thus, knowledge barriers include Limited knowledge on the principles of Resettlement Action Plan, Monitoring and evaluation of RAP Implementation, Conflict Management and Resolution in RAP implementation as well as RAP implementation and monitoring. This capacity building plan has been taken into consideration in table below.

Table 23: Training Needs for Responsible Institutions Per State

Duration	Item	Module	Who to Train	Resources	Estimated Amount
1 Day	Involuntary Resettlement and Rehabilitation Protocol	Principles of Resettlement Action Plan Monitoring & Evaluation of RAP/ARAP Implementation Public Involvement and Consultation in RAP	SPIU RIC	Full text of OP 4.12 for each participant PowerPoint Presentation Associated Handouts	₦1,000,000
1 Day	Grievance Redress Mechanism	Conflict Management and Resolution in RAP	SPIU, members of Resettlement and Grievance Redress Committees RIC	PowerPoint Presentation Associated Handouts	₦404,000
1 Day	Basics of Livelihood Restoration	Cash Management and Monitoring Book keeping and Record Management Investment Decision making			₦600,000
				TOTAL:	**₦2,004,000**

CHAPTER 9: MONITORING AND EVALUATION

9.1 Overview

Impacts mitigation measures reflected in the RAP need to be monitored very closely. Monitoring is required in order to ensure:

i. Compensation and resettlement assistances are delivered on promptly,
ii. GRM is functional and disputes are resolved efficiently and, contractor(s) are in full compliance with safeguard requirement and are within the defined setback.

Implementation of this RAP shall be regularly supervised and monitored by the Social Safeguard Officer in coordination with M&E Officer of the SPIU. The findings will be recorded in quarterly reports to be furnished to the FPIU and the World Bank. There will be two levels of monitoring; namely internal monitoring and external monitoring. Under internal monitoring the SPIU M&E officer will lead the task for the SPIU M&E Unit while an external monitoring and evaluation officer will be engaged periodically

9.2 Internal Monitoring

The social safeguard unit of the SPIU will perform periodic monitoring of all resettlement activities and the GRM operations in the Unit's portfolio. The SPIU Safeguard section will report at least quarterly on the implementation schedule, delivery and usage of any resettlement compensation, extent of community involvement and efficiency of resettlement agencies in fulfilling their obligations.

9.3 Independent Monitoring

The State Project Implementation Units (SPIU) will engage an independent firm or organization who would serve as third party monitors (TPM) to conduct periodic external assessments of resettlement progress. The State agencies will develop a detailed monitoring work plan for the terms of reference, based on the resettlement plan submitted to and approved by the World Bank. The various State Agencies will select a firm with extensive experience in social survey and resettlement monitoring for this work. The SPIU will review and approve the questionnaires and inventory forms developed by the consultant, as well as the research methods, analytic techniques, and reporting formats proposed by the consultant. The aim of this independent monitoring is to provide verification of key concerns in resettlement, such as compliance with resettlement policies, implementation progress, the extent of effective consultation and participation of local populations, and the direction and extent of changes of income and livelihood among displaced persons. Careful attention to monitoring matters such as these will help ensure equitable benefits for every displaced person. Furthermore, the SPIU will also engage an independent consultant to conduct a RAP completion audit of the RAP implementation upon completion of RAP implementation.

9.4 Monitoring Indicators

In-house monitoring may need to be supplemented by independent external monitors to ensure complete and objective information. Thus, the project has developed an extensive M&E system that includes:

i. Internal monitoring, in particular reporting by government officials and field consultants, community participatory monitoring;
ii. External monitoring, with NGOs and journalists providing independent monitoring; and
iii. Impact evaluation.

Table 24: Monitoring Indicator

Indicator	Variable	Indicator Category by Responsible Organisation	
		Internal	External
Shelter	Evidence of new and satisfactory shelter. Affected mud houses are replaced with cement blocks.	X	X
Business Premises	Evidence of payment of disturbance allowance. Moveable kiosks are relocated to spots that will enhance sales and income generation.	X	X
Farming income	Evidence of payment of compensation. Evidence of improved seedlings and training to farmers on Agric Extension practices to improve agricultural yield. Evidence of improved agricultural yield. Increased patronage including export to markets.	X	X
Consultation	Number of people reached or accessing Information, Information requests, issues raised etc.	X	X
	Number of local CBOs participating	X	
Compensation and reestablishment of PAPs	**Physical Progress of compensation and assistance**		
	Number of PAPs affected (buildings, trees,)	X	
	Number of PAPs compensated by type of loss	X	
	Amount compensated by type and owner	X	
	Number of replacement asset recovered	X	
	Compensation disbursement to the correct parties;	X	
Socio-economic Changes	Level of income and standard of living of the PAPs No of income restored, improved or declined from the pre-displacement levels;	X	X
Training	Number of SPIU and RAP committee members trained	X	X
Grievance redress mechanism	No. of cases referred to GRC No. of cases settled by GRC No. of cases pending with GRC Average time taken for settlement of cases No. of GRC meetings No. of cases referred to the court No. of pending cases with the court No. of cases settled by the court	X	X
Overall Management	Effectiveness of compensation delivery system Timely disbursement of compensation. Census and asset verification/quantification procedures in place Co-ordination between local community structures, PAPs and SPIU	X	X

9.5 Implementation Schedule

The schedule for the implementation of the RAP is presented in Table 23 of this report. The implementation of monitoring activities will be carried out upon completion of payment of compensation, and before commencement of civil works. Furthermore, upon completion of civil works, a RAP audit will be conducted.

CHAPTER 10: STAKEHOLDERS CONSULTATION

10.1 Method and participation

The stakeholders' consultation was held between 20th August – 13th September, 2025 across all the 53 PHCs with the community leaders from the affected communities, the Project Affected Persons and other groups at the community level. The consultations provided an opportunity to interact with the opinion leaders in the host communities and intimate them on the proposed project.

10.2 Choice and Right

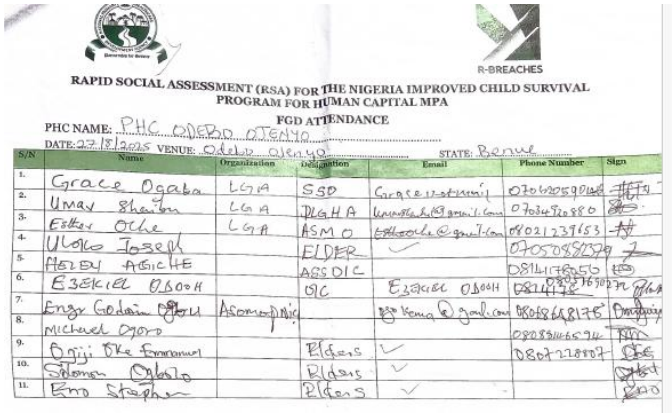
The information passed to stakeholders includes the project design, anticipated timeframe for project commencement, benefit, and anticipated impact of the project to individual and the communities and the possibility for the stakeholders to contribute to the project design, the right of PAPs to resettlement and compensation, right to seek redress through the Grievance Redress Mechanism (GRM) when they are aggrieved. In other words, the PAPs, specifically, were told that they have the opportunity to air their concerns and suggestions which will be incorporated to the project design and in implementation process.

They were made aware of their rights, which include compensation for impacts and alternatives – even if they are willing to give up land, assets and or livelihood in the public interest.

10.3 Concerns and resolutions

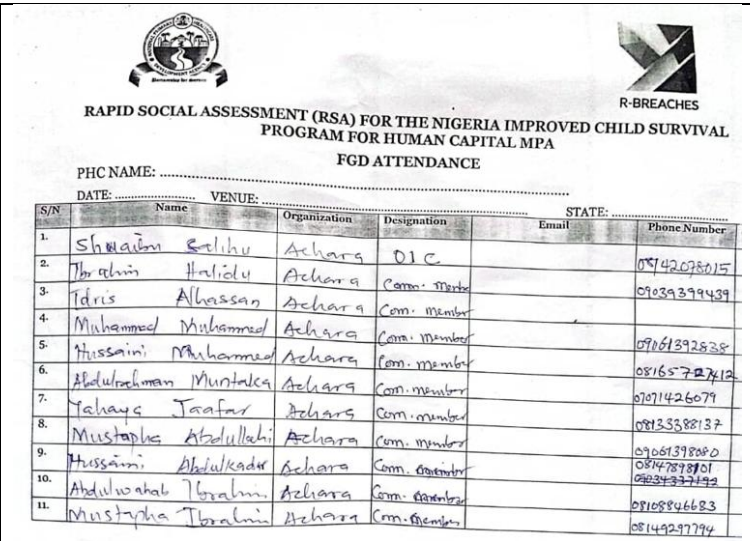
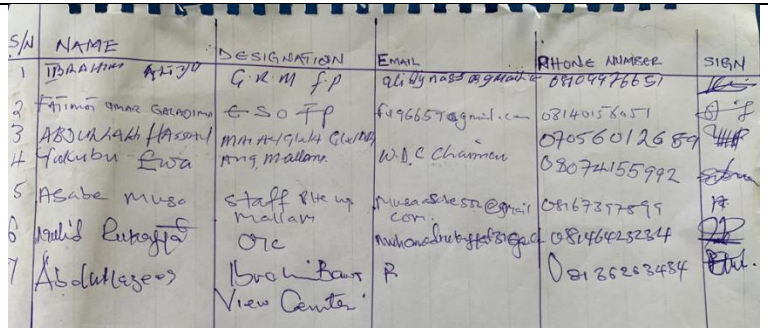
Consultations with the communities leaders, ward leaders and other stakeholders including PAPs where identified were carried out and summary presented in the preceding tables below. The RAP consultant provide a detailed description of the project and the potential impact on livelihoods and assets, while highlighting the essence of the RAP. The table below summarizes the consultations where PAPs that were identified across the 6 states

Venue: Consultations were held within and around the premises of each Primary Healthcare Centre (PHC) site.
Objective of the meeting: The objective of this meeting is to identify and evaluate social issues, with particular emphasis on land-related matters, that may have emerged during the rehabilitation or construction of Primary Healthcare Centres (PHCs) facilities. This engagement seeks to obtain stakeholders' views, document any concerns or grievances, and gather constructive recommendations to facilitate the development of fair, transparent, and sustainable solutions.

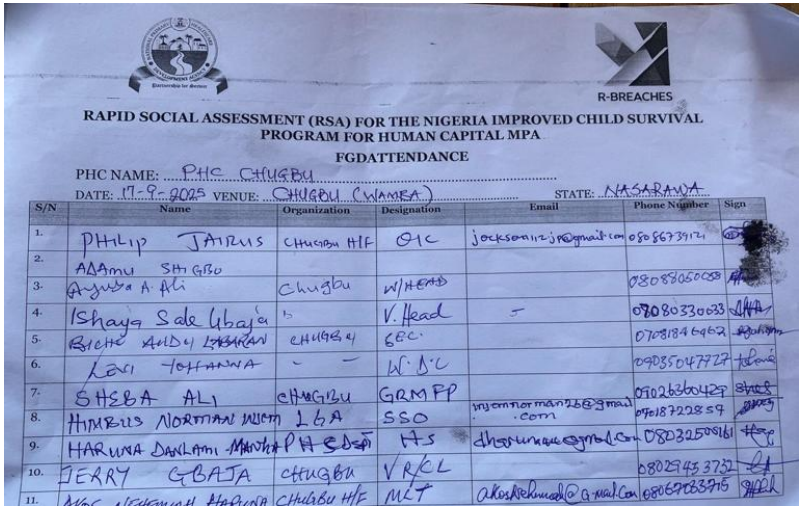
LGA	Key Information from Stakeholders and Other Participants	Pictures & Attendance
Benue State		
Date: 27/08/2025 **LGA: Ado** **PHC Name:** Odebo PHC	As part of the Resettlement Action Plan (RAP) preparation for the IMPACT Project, stakeholder consultations were conducted in Ado LGA, Benue State, specifically at Odebo Primary Health Centre (PHC), where Project Affected Persons (PAPs) were identified. The consultations involved focus group discussions (FGDs) and key informant interviews (KIIs) with community elders, women, and health officials, to understand the history of land donation, the extent of impact, and community perceptions of the project. These engagements formed part of the participatory process required under World Bank OP 4.12 to ensure transparency, community ownership, and informed consent. During the consultations, community members confirmed that the land on which the PHC stands was donated by the community in 1992 for the establishment of a health facility to improve access to healthcare. The land was originally used for farming before the donation, and the decision to allocate it was made collectively by community elders, including the late Chief William Uloko Otokpa (Village Head) and other respected leaders. It was noted that while the PHC and staff quarters were initially constructed, the structures later collapsed, leading to temporary relocation of health services to a property donated by the former Local Government Chairman. The consultations revealed no major disputes over land ownership, as the community collectively recognized the land as communal property. However, a case of encroachment by an informal occupant living in a hut on the site was reported, prompting the community to establish a five-member committee to regularize land documentation and liaise with project authorities. The discussions also highlighted that some households experienced minor economic and physical displacement, particularly farmers cultivating cassava on the land. Affected persons expressed willingness to cooperate with the project due to its community benefits, provided they are adequately informed and supported. The community acknowledged the existence of a grievance redress mechanism (GRM) through a suggestion box, which they described as functional	  RAPID SOCIAL ASSESSMENT (RSA) FOR THE NIGERIA IMPROVED CHILD SURVIVAL PROGRAM FOR HUMAN CAPITAL MPA FGD ATTENDANCE PHC NAME: PHC ODEBO OTENYA DATE: 27/8/2025 VENUE: Odebo Otenya STATE: Benue S/N | Name | Organization | Designation | Email | Phone Number | Sign 1. Grace Ogaba | LGA | SSD | Grace...@gmail.com | 07064205901 | # 2. Umar Shaibu | LGA | DLHA | 07034920880 | 3. Esther Oche | LGA | ASMO | 08021237153 | 4. Uloko Joseph | | ELDER | 07050852329 | 5. Helen Agiche | | AGSDIC | 08141780550 | 6. Ezekiel Otoh | | DIC | Ezekiel Otoh | 08141738 | 7. Engr Godwin Ogbu | Agromorphic | | Kenna@gmail.com | 08068681775 | 8. Michael Ogoro | | | | 08083116574 | 9. Ogiji Oke Emmanuel | | Elders | ✓ | 08027278807 | 10. Solomon Ogbolo | | Elders | ✓ | 11. Emo Stephen | | Elders | ✓ |

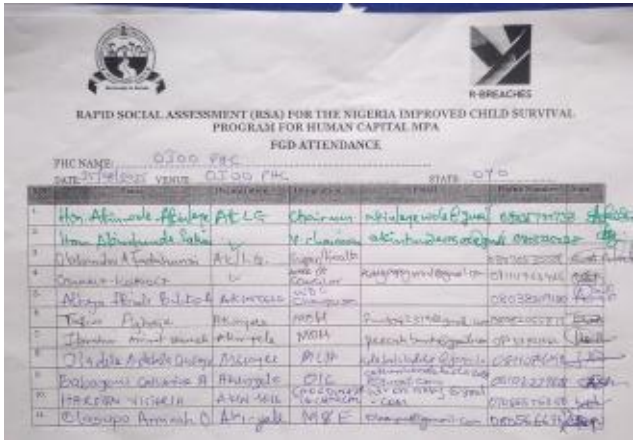
	and effective. Stakeholders appreciated the contractor's respectful relationship with the community and suggested that future PHC siting processes should include broader consultation, proper documentation, and inclusive participation to avoid potential disputes. In summary, the consultation outcomes reaffirmed community support for the IMPACT Project and validated the need for a Resettlement Action Plan to address the minor livelihood and land-related impacts identified. The process demonstrated strong local ownership, cooperative engagement, and the willingness of stakeholders to collaborate in ensuring equitable resettlement and sustainable project implementation.	
Date: 29/08/2025 **LGA:** Obi **PHC Name:** Ameka PHC	As part of the Resettlement Action Plan (RAP) development for the IMPACT Project, consultations were conducted in Ameka community, Obi Local Government Area of Benue State, where a Primary Health Centre (PHC) site was identified as involving a Project Affected Person (PAP). These consultations aimed to align with the World Bank's OP 4.12 principles, which emphasize voluntary participation, transparency, and mitigation of adverse social and economic impacts. During the discussions, it was confirmed that the land was originally used for farming by Mr. Imoha Anthony, who later voluntarily donated the land for the establishment of the PHC after the earlier site donated by the community became disputed. The land was privately owned and inherited by Mr. Imoha from his father, and not part of communal land. The elders of Ameka, including Iji Ikpe Jacob, Igoh Agida Esther, and others, were present during the decision-making process and confirmed that the donation followed a collective agreement to promote easy access to healthcare for the community. The donor's wife, who had been farming on the land, was consulted prior to the donation and willingly accepted the decision, acknowledging that the project would cause minor economic displacement but serve a greater community benefit. There were no recorded disputes or resistance over the donation, and no written agreement was executed, though community leaders recommended that formal land documentation be pursued to prevent future misunderstandings. The consultation further revealed that the community maintains a functional grievance redress mechanism (GRM) managed through traditional elders who handle complaints and mediate conflicts. This system is recognized and trusted by community members, though no grievances had been recorded regarding the land acquisition at the time of the field visit. The community acknowledged that	  R-BREACHES **RAPID SOCIAL ASSESSMENT (RSA) FOR THE NIGERIA IMPROVED CHILD SURVIVAL PROGRAM FOR HUMAN CAPITAL MPA** **FGD ATTENDANCE** PHC NAME: ...PHC Ameka...LGA...Obi..... DATE: ...29/08/2025..... VENUE: .....PHC Ameka..... STATE: Benue ..... S/N | Name | Organization | Designation | Email | Phone Number 1. | Alome Okwache | LGHA | LGHA | | 08062989668 2. | Abo Christopher A. | LGHA | SMOIHE | | 0706120082 3. | Igoh Agida Esther | LGHA | OIC | | 08100080923 4. | Engr. Paul Ododa | | Site engineer | | 07068912104 5. | Imoha Anthony | Community | Land Donor | | 07058789990 6. | Iji Ikpe Jacob | WDC | Elder | | 08089798028 7.

	the relationship with the initial contractor required improvement but appreciated the project's health benefits. The donor expressed continued willingness to support the project and even offered to provide an additional parcel of land near the primary school if expansion becomes necessary. Overall, the consultation demonstrated broad community support, voluntary land donation, and minimal resettlement impact, consistent with the participatory approach required for RAP implementation and sustainable project delivery.	
Kogi State		
Date: 12/09/2025 **LGA:** Kogi **PHC Name:** Achara PHC	Stakeholder consultations were carried out in Achara community, Kogi Local Government Area of Kogi State, as part of the field activities for the preparation of the Resettlement Action Plan (RAP) under the IMPACT Project. The consultations included Focus Group Discussions (FGDs) with community members and Key Informant Interviews (KIIs) with traditional leaders and land donors. These engagements sought to confirm land ownership, establish whether any resettlement or livelihood impacts occurred, assess community awareness of grievance redress mechanisms, and document the level of participation in the land donation process. Discussions revealed that the land allocated for the Primary Health Centre (PHC) was community-owned and had previously been used for farming activities by a few households. The decision to donate the land was made collectively by the chief, council of elders, and youth representatives in recognition of the need for improved access to healthcare within the community. Farmers who cultivated on the land were consulted prior to the donation and were allocated alternative plots elsewhere within the community to continue their farming activities. As such, no physical displacement occurred and only minor, temporary economic disruption was experienced. The community confirmed that an agreement letter was signed by the community chief formally allocating the land to the project. There were no disputes or resistance to the land donation, and the process was viewed as voluntary and beneficial to the wider community. The community reported that a grievance redress mechanism (GRM) exists within the framework of the IMPACT project, which includes local focal persons and traditional leaders serving as complaint channels. The system was described as effective, accessible, and user-friendly, though no formal complaints had been received at the time of consultation. Community members are aware of	

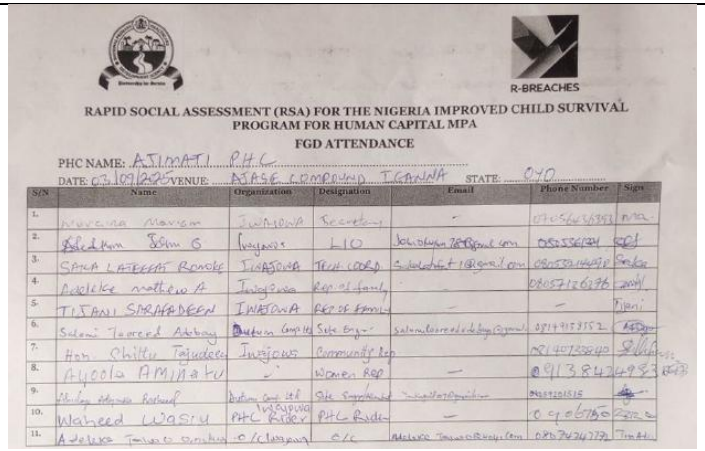
	their rights to lodge complaints and can escalate unresolved issues through the designated project channels. Stakeholders emphasized that the relationship with project representatives has been cordial and cooperative. The community chief, who led the donation process, expressed his wish that construction be fast-tracked, as residents currently depend on a temporary classroom facility for healthcare. Overall, the consultation confirmed voluntary land donation, strong community participation, and broad support for the project, consistent with the principles of informed consent, transparency, and livelihood protection required under the World Bank's OP 4.12 on Involuntary Resettlement.	 R-BREACHES RAPID SOCIAL ASSESSMENT (RSA) FOR THE NIGERIA IMPROVED CHILD SURVIVAL PROGRAM FOR HUMAN CAPITAL MPA FGD ATTENDANCE PHC NAME: ..... DATE: ..... VENUE: ..... STATE: ..... S/N | Name | Organization | Designation | Email | Phone Number 1. Shuaibu Salihu | Achara | OIC | | 08142078015 2. Ibrahim Haliru | Achara | Com. Member | | 09039399439 3. Idris Alhassan | Achara | Com. member | | 4. Muhammed Muhammed | Achara | Com. Member | | 08061392838 5. Hussaini Muhammed | Achara | Com. member | | 08165727412 6. Abdulrahman Muntaka | Achara | Com. member | | 07071426079 7. Yahaya Jaafar | Achara | Com. member | | 08133388137 8. Mustapha Abdullahi | Achara | Com. member | | 09061398080 9. Hussaini Abdulkadir | Achara | Com. member | | 08147878101 10. Abdulwahab Ibrahim | Achara | Com. Member | | 08108846683 11. Mustapha Ibrahim | Achara | Com. Member | | 08149297794
Nasarawa State		
Date: 22/08/2025 **LGA: Nasarawa** **PHC Name:** Angwan Mallam PHC	As part of the Resettlement Action Plan (RAP) preparation for the IMPACT Project, extensive consultations were conducted in Anguwar Malan community, Nasarawa Local Government Area of Nasarawa State, where land was acquired for the construction of a Primary Health Centre (PHC). The consultation process involved Focus Group Discussions (FGDs) with community representatives, Ward Development Committee (WDC) members, and PHC staff, as well as Key Informant Interviews (KIIs) with the land donor and local leaders. The discussions aimed to document the history of land ownership, assess the nature and extent of any displacement or livelihood impact, and gauge community awareness of grievance redress mechanisms (GRMs) established under the project. From the consultations, it was established that the land on which the PHC was built was previously used for commercial activities, specifically as a football viewing centre, and earlier as a mechanic workshop. The owner of the land, who later sold it, had used the property for multiple livelihood activities including film shows, poultry farming, and small-scale agriculture. According to the land donor, the transaction was facilitated through the Local Government Chairman, who persuaded him to release part of his land for the establishment of a health facility	 S/N | NAME | DESIGNATION | EMAIL | PHONE NUMBER | SIGN 1 IBRAHIM | G.R.M F.P | | 08044766651 2 Fatima Umar Gelaidimu | E.S.O F.P | fu96657@gmail.com | 08140156951 3 ABDULLAHI HASSAN | MALAM/GLMA CHAIRMAN | | 07056012689 4 Yakubu Ewa | Ang Mallam | W.D.C Chairman | 08072155992 5 Asabe Musa | Staff PHC up Mallam | Musaasabesa@gmail.com | 08167377895 6 Walid Rutagita | OIC | Muhamadrutagita83@gmail.com | 08146423234 7 Abdulazeez | Borehole View Center | R | 08136283484

	for public benefit. Although the donor initially resisted due to the loss of income derived from the land, he eventually consented, motivated by the potential health benefits to his community. There was, however, no formal written agreement or documentation to support the sale, even though the donor possessed a state and local government certificate of land ownership. The donor confirmed that the land acquisition led to economic displacement as it disrupted his farming, poultry, and commercial viewing activities, though no physical displacement occurred. The donor also expressed that he was promised compensation by local authorities, which was yet to be fulfilled at the time of consultation. The community affirmed that there were no major disputes or conflicts over the land, though some members expressed concern about the lack of transparency regarding the transaction details and documentation. The Ward Development Committee (WDC) and the Local Government Authority (LGA) were instrumental in facilitating communication and ensuring the land was secured to avoid losing the PHC project opportunity. The FGD participants noted that a grievance redress mechanism is in place within the community, including complaint boxes and phone hotlines, which are managed jointly by the WDC and social mobilization officers. The GRM was described as effective and accessible, though no grievances related to the PHC construction had been reported. The consultation further revealed that community members generally supported the project, recognizing its potential to enhance healthcare access, especially for women and children. However, participants emphasized the need for proper documentation of land transactions, transparent communication during land acquisition processes, and consideration of livelihood support for affected persons. The engagement concluded with stakeholders expressing appreciation for the project's objectives and a commitment to cooperate in ensuring its successful and sustainable implementation in line with World Bank OP 4.12 on Involuntary Resettlement.	

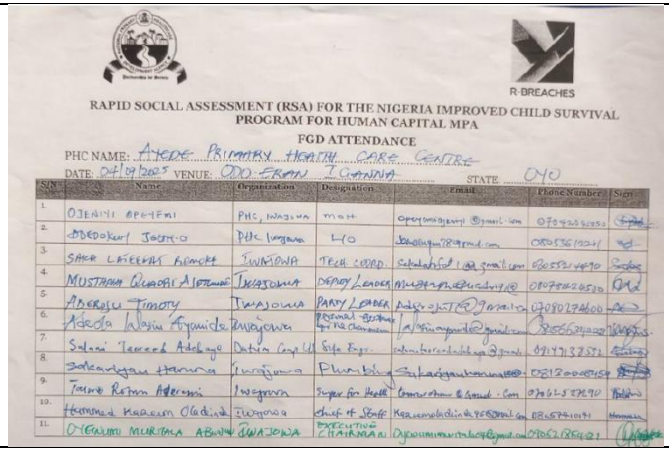
Date:11/09/2025 **LGA:** Wamba **PHC Name:** Chugbu PHC	As part of the field activities for the preparation of the Resettlement Action Plan (RAP) under the IMPACT Project, stakeholder consultations were carried out in Arum Sarki (Chugbu) community, located in Wamba Local Government Area of Nasarawa State, where land was provided for the construction of a Primary Health Centre (PHC) and associated staff quarters. The consultations involved Focus Group Discussions (FGDs) with community representatives, local leaders, and project stakeholders, as well as Key Informant Interviews (KIIs) with the land donor and community elders. These engagements aimed to verify land ownership, determine whether any displacement occurred, document the level of stakeholder participation, and assess the functionality of existing grievance redress mechanisms. Discussions revealed that the land on which the PHC stands was privately owned by Mr. Zubairu Ayara, a respected member of the Chugbu community, who voluntarily donated it for the establishment of the health facility. Prior to the donation, the land was not in active use for farming, residence, or business, as the former occupant had passed away. The decision to donate the land was made with the consent of the donor's family and in consultation with community elders and the local Ward Development Committee (WDC). There were no reported cases of physical or economic displacement, and no livelihood losses were recorded. The donation was documented formally, and community members confirmed that it was motivated by the desire to improve access to quality healthcare services within the community and its surroundings. There were no disputes or resistance recorded during or after the donation process. Community members expressed satisfaction with the project and appreciated its contribution to improved healthcare delivery. The community operates an active grievance redress mechanism (GRM) that includes complaint boxes, focal persons, and local communication channels. Respondents confirmed that the system is effective and accessible, and that community members are aware of its existence and use it to address minor issues as they arise. No complaints relating to land acquisition or PHC construction had been received at the time of the field visit. Stakeholders, however, provided some recommendations for future project improvements, including the installation of interlocking tiles around the water tap area, repair of the leaking roof of the new staff building, and rehabilitation of the public toilet. They also requested that additional staff, particularly cleaners, be assigned to the facility to enhance hygiene and maintenance.	  R-BREACHES RAPID SOCIAL ASSESSMENT (RSA) FOR THE NIGERIA IMPROVED CHILD SURVIVAL PROGRAM FOR HUMAN CAPITAL MPA FGDATTENDANCE PHC NAME: PHC CHUGBU DATE: 17-9-2025 VENUE: CHUGBU (WAMBA) STATE: NASARAWA S/N | Name | Organization | Designation | Email | Phone Number | Sign 1. PHILIP JAIRUS CHUGBU HF OIC 08086739121 2. ADAMU SHIGBO 3. Ayuba A. Ali Chugbu W/HEAD 08088060033 4. Ishaya Sale Ubaja V. Head 08080330033 5. Rieche Aida Lakaran CHUGBU CBC 07081846462 6. Lavi Yohanna W.D.C 09035047727 7. SHEBA ALI CHUGBU GRM PP 07026360429 8. Himbus Norman Mich LGA SSO injennorman25@gmail.com 07018722857 9. Haruna Danlami PHSDSA HS dhorumaa@gmail.com 08032509161 10. JERRY GBAJA CHUGBU VRCL 08029453732 11. CHUGBU HF MLT 08065783915

	Overall, the consultation confirmed that the land donation was voluntary, well-documented, and free from dispute, with strong community ownership and support for the project's objectives, consistent with the participatory and safeguard principles of the World Bank's OP 4.12 on Involuntary Resettlement.	
Oyo State		
Date: 25/08/2025 **LGA:** Akinyele **PHC Name:** Ojoo PHC	As part of the stakeholder engagement process for the preparation of the Resettlement Action Plan (RAP) under the IMPACT Project, consultations were held with relevant stakeholders and affected persons at Ojoo Community in Akinyele Local Government Area of Oyo State. The discussions aimed to document the land acquisition process, identify any physical or economic displacement, and assess community participation and awareness of grievance redress mechanisms (GRMs). The land allocated for the new Primary Health Centre (PHC) at Ojoo previously served as a motor park (Lagos–Ibadan route) and a trading hub with numerous makeshift stalls, containers, and umbrellas used by petty traders and food vendors. About Eight informal occupants were identified as project-affected persons (PAPs), operating small-scale businesses in cosmetics, soft drinks, clothing, POS services, and food sales. While the land belonged to the Akinyele Local Government, it was informally occupied by transport operators and traders. The formal user, the transport union, was relocated to a new modern bus terminal constructed by the state government, while informal traders were displaced. According to the Baale and local government chairman, the traders were informed early and given time to vacate the land before demolition commenced. Shops were later constructed in front of the project site as an alternative, but reports indicate that the new shops were priced at about ₦4 million per unit, which was considered unaffordable for the displaced traders. This issue was brought to the attention of the Baale, who is reportedly liaising with the local government chairman to review the cost or explore a more inclusive arrangement. Consultations were carried out on two major occasions with the traders, transport operators, and community leaders, though these meetings were more informative than participatory, mainly to announce the project and relocation timeline. However, according to the Local Government Chairman, a broader town hall meeting was convened involving the Baale, the Iyaloja (market women	 

	leader), youth representatives, and the local PHC management committee. The meeting confirmed that there were no permanent structures on the land and that all affected persons had been informed and moved before construction began. No physical displacement of households occurred, but economic displacement was recorded for the petty traders whose livelihood activities were temporarily affected. The grievance redress process in Ojoo remains largely informal, relying on visits to the Baale's palace or the office of the Local Government Chairman. There are no formal GR channels such as complaint boxes, toll-free lines, or designated grievance officers for the IMPACT Project. Nonetheless, community members confirmed that the Baale maintains an open-door policy, and some complaints, especially about the affordability of replacement shops, have been received and are being addressed through dialogue between the traditional authority and the local government. Overall, the consultation established that the land was government-owned, donated by the Akinyele Local Government for public benefit, and the process of land release was transparent and widely accepted. There was no recorded dispute or resistance during acquisition. However, lessons from Ojoo highlight the importance of ensuring affordability and livelihood restoration support for informal traders affected by public infrastructure projects. Future PHC siting processes should also integrate more formal and inclusive consultation mechanisms, early identification of all PAPs, and clear GRM channels in line with World Bank's Environmental and Social Standard 5 (ESS5) on Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement.	
Date: 03/09/2025 **LGA:** Iwajowa **PHC Name:** Ajimati PHC	Consultations were carried out at Ajimati Primary Health Centre (PHC) in Iganna Community, Iwajowa Local Government Area of Oyo State, as part of the broader engagement for the preparation of the Resettlement Action Plan (RAP) under the IMPACT Project. The purpose was to document community perspectives, assess potential resettlement impacts, and identify grievances or outstanding issues related to land acquisition and project implementation. The land used for the construction of the PHC was family-owned, belonging to the Adeleke/Adekunbi family (also known as the Ogunbunmi family). It was described as the only remaining ancestral land of the family and had been used primarily for subsistence and herbal crop farming by two members of the family, Mr. Adeleke Mathew Adesina, the family head, and Mrs. Sikiratu Mopelola. The	

	land supported the cultivation of herbal leaves, vegetables, and other crops which provided income and food security for the affected members. The family reported that they were not consulted before the land was designated for the PHC project. They were informed by the Ward Councillor and Community Head that their land had been selected for construction, and despite their resistance, the matter was escalated to the Sabiganna of Iganna Land, the paramount ruler. The king intervened and persuaded the family to allow the project to proceed, emphasizing the collective benefit of improved healthcare for the community. In line with cultural traditions, the family accepted the decision but noted that this was done without formal documentation or compensation, describing it as a "forced goodwill." While the family eventually consented to the project due to the king's directive, they expressed lingering resentment and grievance, emphasizing that their crops and livelihood sources were destroyed before harvest and that no form of economic restoration or support was provided. The issue has since created a perception of coerced land donation, as the affected family maintains that the process lacked adequate consultation, fairness, and formal agreements. The family requested that authorities revisit the matter for proper documentation and livelihood support, in line with World Bank safeguard principles. Regarding the grievance redress process, there was no specific mechanism established for the IMPACT project at the time of the consultation. However, the community applies a traditional hierarchical system of grievance resolution. Complaints are first directed to the Ward Development Committee (WDC), and if unresolved, referred to the Community Head, and ultimately to the paramount ruler, whose decision is considered final. Although a grievance redress box has been provided to the facility under construction, it has not yet been mounted or activated. The family's case itself was resolved through this traditional grievance structure, with the king playing a mediatory role. Additionally, a related concern emerged during the consultation: a group of local artisans protested their non-inclusion in construction activities, alleging that external workers were engaged while capable community artisans were sidelined. They requested improved local participation in project implementation, especially in technical and skilled roles, to ensure local economic benefits. In conclusion, the Ajimati PHC case underscores critical lessons for the project: (i) the need for early, inclusive, and documented stakeholder consultation before	 R-BREACHES RAPID SOCIAL ASSESSMENT (RSA) FOR THE NIGERIA IMPROVED CHILD SURVIVAL PROGRAM FOR HUMAN CAPITAL MPA FGD ATTENDANCE PHC NAME: AJIMATI PHC DATE: 07/09/2025 VENUE: AJASE COMPOUND IGANNA STATE: OYO S/N | Name | Organization | Designation | Email | Phone Number | Sign 1. Nwocha Maryam | IWMCWA | Secretary | - | 07056464991 2. Abdulkarim Salim G | Iwajowa | LIO | 08035661224 3. SAMA LAWEEMS RONKE | IWAJOWA | TECH LOCAL | 08055144496 4. Adeleke matthew A | Iwajowa | Rep of family | 08057126296 5. TIJANI SHARAFADEEN | IWAJOWA | REP OF FAMILY 6. Salami Taoreed Abiodun | Ajase Compd | Site Engr | 08147935552 7. Hon Chittu Tajudeen | Iwajowa | Community Rep | 08140728842 8. Ayoola AMINATU | - | Women Rep | 08138426983 9. Alhaji Adeyemi Raimi | Ajase Compd | Site Supervisor | 08037201818 10. Waheed WASIU | PHC Ajase Ridge | PHC Rider | - | 08136[illegible] 11. Adeleke Tawakalitu Omolara | C/C | C/C | Adelekeomolara@gmail.com | 08134734779

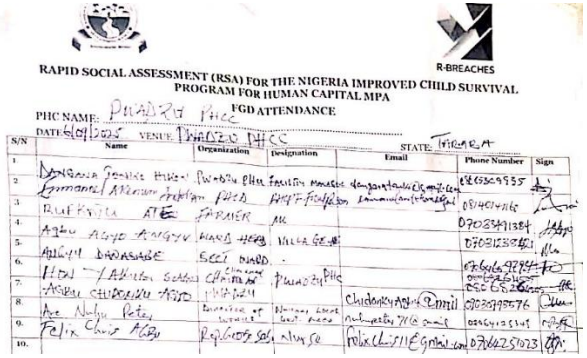
	land acquisition; (ii) the importance of livelihood restoration where economic displacement has occurred; and (iii) the necessity of integrating formal grievance redress channels alongside traditional systems. Ensuring that all land donations are genuinely voluntary, fully informed, and properly recorded will strengthen community trust and enhance compliance with the World Bank's Operational Policy 4.12	
Date: 04/09/2025 **LGA:** Iwajowa **PHC Name:** Ayede Ikia PHC	As part of the Resettlement Action Plan (RAP) preparation under the IMPACT Project, consultations were conducted at Ayede PHC in Ayede-Ikia Community, Iwajowa Local Government Area of Oyo State. The engagement sought to assess land acquisition processes, identify potential displacement or livelihood impacts, and capture community perspectives on grievance management and inclusion during project execution. The land on which the Ayede PHC is being constructed was donated by the Baale (Community Head) of Ayede, a member of the Ayede Royal Chieftaincy Family, who offered a portion of his family farmland for the development of the health facility. The land was part of a cashew plantation, and several trees were cleared to make way for construction. The donation was made voluntarily on behalf of the community, reflecting the Baale's commitment to community development and improved access to healthcare. Following the Baale's demise, his family, represented by Prince Oyetunji Bolatito Olaniyi (Family Head), continues to oversee the land and support the ongoing project. There was no recorded dispute over the land, as the donation originated from the rightful owner and community leader himself. While the donation process was widely accepted, it was noted that no formal documentation had been executed to legitimize the transfer of the land for public use. The consultant team advised the community to undertake proper documentation through a deed of gift or memorandum of understanding (MoU) to safeguard future claims and to ensure compliance with the World Bank's requirements for voluntary land donations (VLDs). Regarding grievances, there was no land-related dispute reported; however, concerns were raised by local artisans and youths over their limited inclusion in construction activities. They protested that external artisans were engaged by the contractor (DUTUM Engineering) for specialized tasks such as roofing, plumbing, tiling, and electrical fittings, while local artisans were only engaged for menial labor, carpentry, and masonry. The community requested that	

	indigenous artisans be prioritized in the remaining project phases to promote local participation and avoid possible sabotage or resentment. Additionally, the donor's family requested that at least one family member be considered for employment at the facility as a gesture of appreciation for their contribution. The grievance redress mechanism (GRM) within the community remains largely traditional. The palace of the Baale and the council of chiefs serve as the recognized grievance resolution body, and this process is well known and accessible to all community members. For the IMPACT project specifically, a grievance redress box has been provided for installation at the PHC once construction is completed, though awareness of this mechanism among residents is still limited due to the project's ongoing status.	 R-BREACHES RAPID SOCIAL ASSESSMENT (RSA) FOR THE NIGERIA IMPROVED CHILD SURVIVAL PROGRAM FOR HUMAN CAPITAL MPA FGD ATTENDANCE PHC NAME: AYEDE PRIMARY HEALTH CARE CENTRE DATE: 04/09/2025 VENUE: ODO-ERAN I GHANA STATE: OYO SIN | Name | Organization | Designation | Email | Phone Number | Sign 1. OJEAMI BOLUWATIFE | PHC, IWAJOWA | MOH 2. ADEDOKUN JOSEPH O | PHC Iwajowa | LIO 3. SAKA LATEEFAT ADEMOLA | IWAJOWA | TECH. COMD 4. MUSTAPHA OLUWAFEMI ADEMOLA | IWAJOWA | DEPUTY LEADER 5. ABEROSU TIMOTHY | IWAJOWA | PARTY LEADER 6. ADEOLA WASIU AYOMIDE | IWAJOWA | PERSONAL ASSISTANT TO THE CHAIRMAN 7. SALAMI TAWAKALTU ADEKUNJE | OYO EAST | SITE REP 8. SULEMAN HAMMA | IWAJOWA | PHARMACY 9. TAIWO ROTIMI ADEMOLA | IWAJOWA | SUPER FOR HEALTH 10. MUHAMMED MAKEEN OLADIPO | IWAJOWA | CHIEF OF STAFF 11. OYEKUNLE MURITALA ABIODUN | IWAJOWA | EXECUTIVE CHAIRMAN
Plateau State		
Date: 04/09/2025 **LGA:** Jos North **PHC Name:** Jarawa PHC	Consultations were conducted in Jos Jarawa Community, Jos North Local Government Area of Plateau State, as part of the Resettlement Action Plan (RAP) process under the IMPACT Project. The objective was to document the land acquisition process, identify any potential resettlement or livelihood impacts, and assess the adequacy of stakeholder engagement and grievance management mechanisms. The land used for the construction of the BHCPF Clinic was privately owned and previously served a residential purpose. The site consisted of a family compound occupied by tenants, with Mr. Suleman Musa Afan identified as one of the affected persons who resided on the property. The land was owned by a retired nurse and matron who, driven by her concern for the health and welfare of the community, decided to sell the land at a highly subsidized ("giveaway") price to support the establishment of a healthcare facility. The purchase was financed by the then Local Government Chairman as part of his contribution to improving local healthcare access. The consultation revealed that adequate discussions preceded the land acquisition, involving key stakeholders such as the late District Head, the former Local Government Chairman, and the Community Youth Leader. The landowner informed the occupants ahead of the sale, issued them evacuation notices, and allowed sufficient time for relocation before the project commenced. The process was therefore carried out on mutual agreement without any coercion or	

	dispute. However, there was no evidence of livelihood restoration or compensation provided to the displaced tenants, although the displacement was limited to residential structures and did not result in long-term economic loss. The grievance redress mechanism (GRM) in the community was found to be functional and accessible. The facility has a complaint box, which is checked daily by staff. Community members were reportedly sensitized on how to use it, and awareness of the mechanism is widespread. As of the time of the field visit, no formal grievances had been lodged, as the community expressed satisfaction and pride in the establishment of the PHC. The existing GRM aligns with basic accountability standards and demonstrates early adoption of project-level feedback systems. During the Focus Group Discussion, participants raised a specific operational concern regarding the absence of staff quarters. They explained that most nurses and health workers reside far from the facility, causing delays in emergency response, especially for pregnant women and other urgent medical cases. The community therefore recommended that accommodation units for staff be included as part of future upgrades to improve service delivery and ensure timely access to healthcare during emergencies. In summary, the BHCPF Clinic in Jos Jarawa represents a case of voluntary land acquisition through mutual agreement, driven by community solidarity and supported by local leadership. The process was free of conflict and had full stakeholder participation. However, the consultation underscores the need for enhanced documentation of land transactions, monitoring of temporary displacements, and provision of staff housing in future health projects. The case aligns with the World Bank's Environmental and Social Standard 5 (ESS5) principles, particularly on voluntary land transactions and community participation in social development initiatives.	R-BREACHES **RAPID SOCIAL ASSESSMENT (RSA) FOR THE NIGERIA IMPROVED CHILD SURVIVAL PROGRAM FOR HUMAN CAPITAL MPA** **FGD ATTENDANCE** PHC NAME: BHCPF CLINIC JOS JARAWA DATE: 04TH SEPTEMBER, 2025 VENUE: BHCPF CLINIC STATE: PLATEAU

S/N	Name	Organization	Designation	Email	Phone Number	Sign
1.	Sabastine Hommuk	Impact	SSO	sabastinehommuk@gmail.com	08034522309	
2.	Martha M. Kummiap	Jos North	DPHC	marthamilat@gmail.com	08035895717	
3.	Martha Kutwal	Jos North	OKJ/Jarawa	marthakutwal36@gmail.com	08065577079	
4.	Comfort John Bitsop	Jos North	HPO	Jcomfort24@gmail.com	07038530306	
5.	Alh. Mu'azu Sam	Jos North	WDC-Vice	muazusamsalisu@gmail.com	08033300353	
6.	Emmanuel Musa Afan	Jos North	Land Owner	fudelek@gmail.com	08031154538	
7.	Hon. John A. Izang	Jos North	Community Leader & Chair	Johnizango86@gmail.com	08034501156	
8.	Suleman Musa Afan	Jos North	Affected Person	sulemanufa@gmail.com	08036166871	
9.	Moses Maina Abok	Jos North	Ward Head ATA A	NIL	07068213197	
10.	Asabe Gabau Yohanna	Jos North	S/Councilor	Asabeyohanna07@gmail.com	07037996751	

Taraba State

Date: 06/09/2025 **LGA:** Wukari **PHC Name:** Pwadzu PHC	onsultations were conducted at Pwadzu Primary Health Centre (PHC) in Pwadzu Community, Wukari Local Government Area of Taraba State, as part of the Resettlement Action Plan (RAP) preparation under the IMPACT Project. The engagement focused on documenting the land acquisition process, assessing potential impacts on livelihoods, and evaluating community awareness and participation during the donation and project implementation. The land used for the PHC staff quarters was originally privately owned and was donated by Hon. George Sabo Adi, a philanthropist and civil servant from Pwadzu Ward, who purchased the land from Mr. Brown (represented by Angyu Danasabe) specifically for the project. The land had previously been used by Mrs. Rifkatu (07033491384) for small-scale vegetable farming under an informal arrangement with the original landowner. Her activities were limited to subsistence farming, primarily vegetables and small crops, which helped maintain the cleanliness of the area. Mrs. Rifkatu confirmed that she was aware of the pending donation and had agreed to vacate the land whenever it was needed for community development. Although she was not compensated, she expressed no grievance, acknowledging that she had been informed and consulted before the project began. Consultations were held with all key stakeholders, including the Officer-in-Charge (OIC), Mr. Dangana Tanko Hikon (08065309935), the Ward Head, Mr. Agbu Agyo Angyu (07031238421), and members of the PHC Committee. The process of land acquisition was transparent, with the purchase and donation conducted openly and witnessed by community leaders. It was confirmed that the land was donated solely for the benefit of the PHC project, with no dispute or contestation from any party. Both the donor's representative, Mr. Felix Chris Agbu (07064251023), and the local leadership affirmed that the donation was voluntary and documented with signed ownership papers, which were handed over to the PHC Officer-in-Charge for safekeeping. The consultation also revealed a functioning grievance redress mechanism (GRM) at the PHC. The facility maintains a complaint and suggestion box, a WhatsApp communication platform, and a traditional in-person grievance channel coordinated through the community leader's residence. Community members are aware of these channels, although the affected farmer (Mrs. Rifkatu) noted that she was not sure of the exact location of the complaint box. No formal complaints have been recorded so far. The GRM is supported by an informal practice of resolving issues through the Ward Head and PHC	 

	Committee, which serves as an accessible and culturally appropriate mechanism for managing concerns. In addition to expressing gratitude for the project, the community made several recommendations. The Ward Head and the PHC focal person requested that the facility compound be fenced and equipped with a borehole to reduce dependence on the main clinic's water source. They also suggested that electricity supply to the staff quarters be prioritized for the safety and comfort of healthcare workers. The land donor's representative recommended that future PHC land acquisitions ensure fencing and proper documentation from inception to prevent encroachment and to guarantee tenure security. Overall, the Pwadzu PHC consultation demonstrated a voluntary and transparent land donation process, supported by strong community participation and traditional leadership oversight. The case recorded a minor economic displacement of one informal land user (the vegetable farmer), though without grievances or loss of shelter. The consultation underscores the importance of formalizing voluntary land donations through written agreements, ensuring livelihood restoration for informal users, and maintaining effective grievance redress systems. The process aligns with the guiding principles of the World Bank's Environmental and Social Standard 5 (ESS5) on Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement.	

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Compulsory Acquisition of Land and Compensation in Infrastructure Projects, World Bank (2012)

IFC performance Standards on Environmental and Social Sustainability, World Bank (2012)

Strategic Framework for Mainstreaming Citizen Engagement in World Bank Group, World Bank (2004)

Handbook for Preparing a Resettlement Action Plan, World Bank (2002)

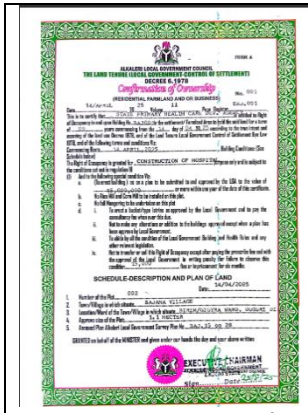
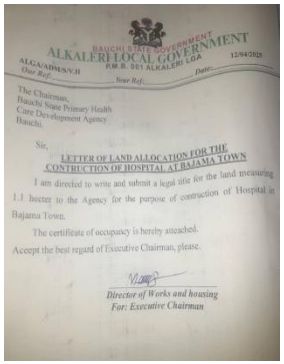
Operational Manual (Safeguards on Involuntary Resettlement), World Bank (2001)

ANNEXES

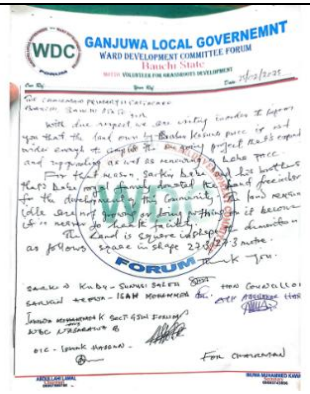
Annex 1: Cost Derivation Table

Annex 2: PAPs Register

Annex 3: Land Donation and Purchase Document

Bauchi - Alkaleri

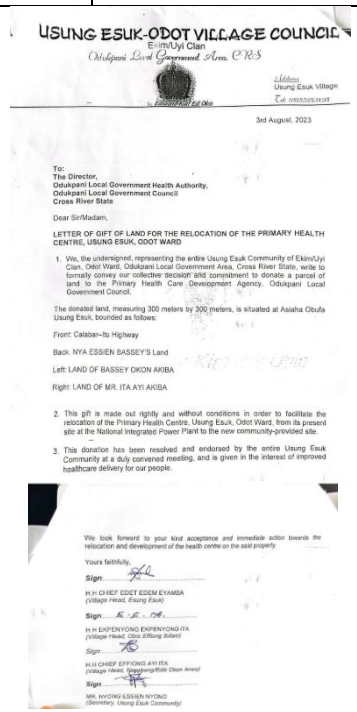


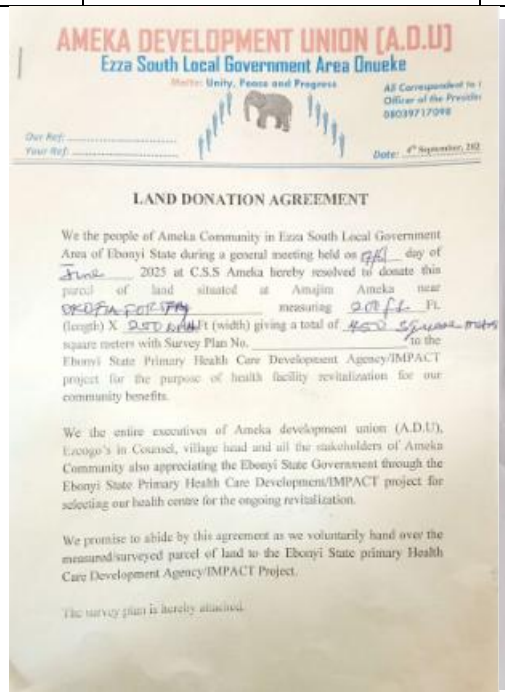
Bauchi -Ganjuwa

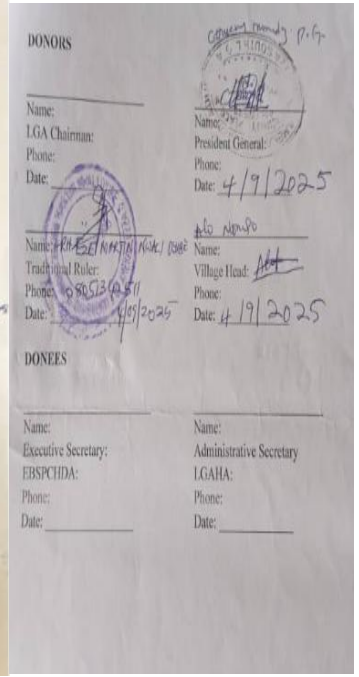
Bauchi - Jamaare

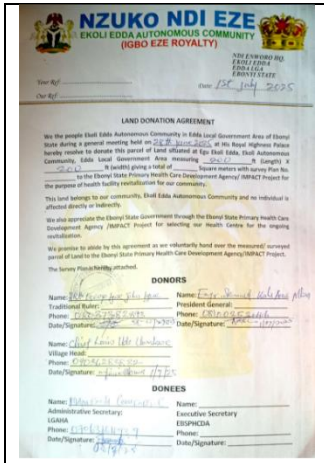
Bauchi - Misua

Cross River -Obubra

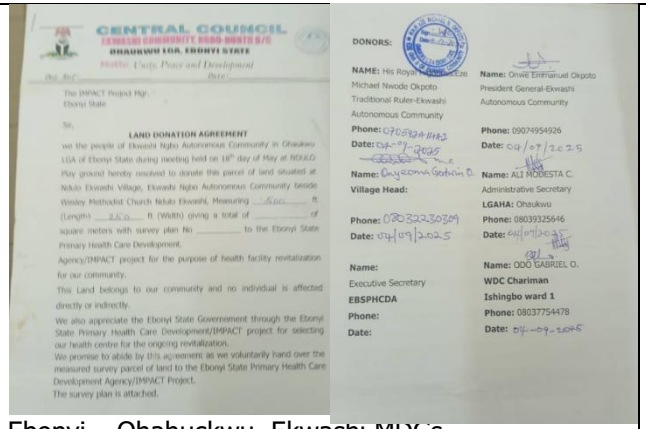






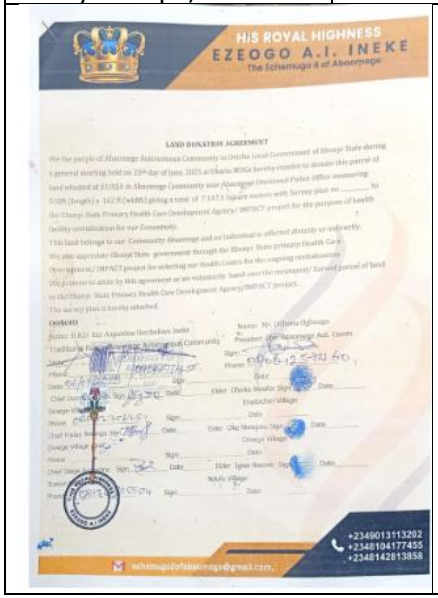


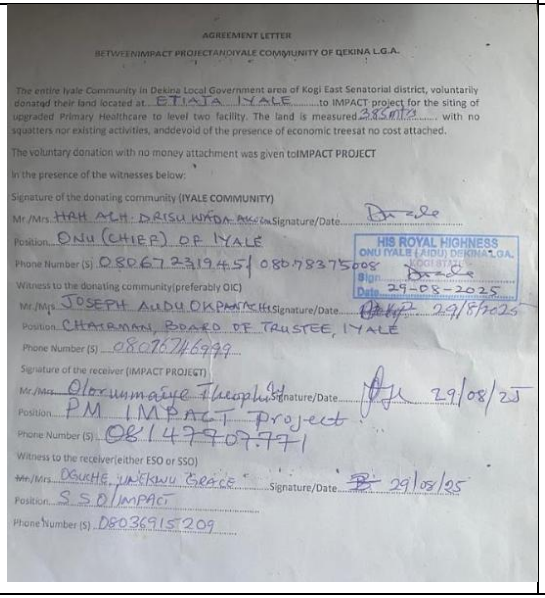
Ebonyi – Afipo, Ekoli PHC

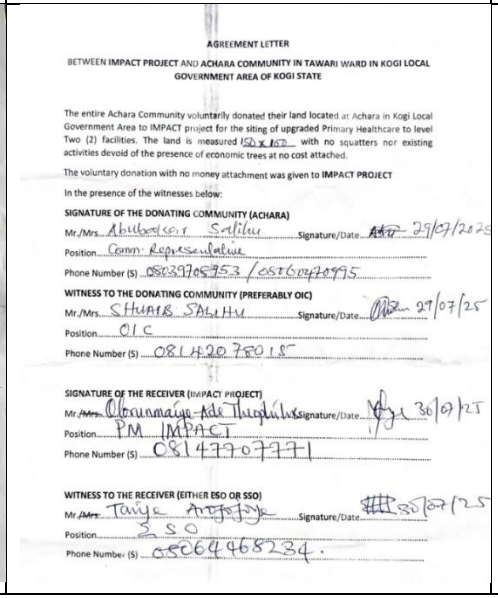


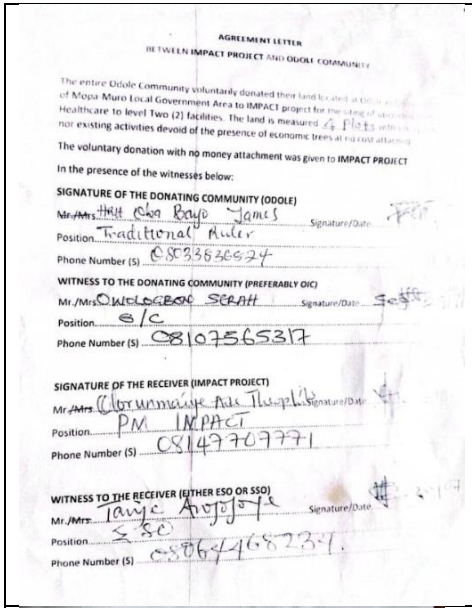
Ebonyi – Ohahuckwu, Ekwashi MDGs

Ebonyi – Ishielu, Iduma PHC









AGREEMENT LETTER

BETWEEN IMPACT PROJECT AND ODOLE COMMUNITY

The entire Odole Community voluntarily donated their land located at Odole in the ward of Mopa-Muro Local Government Area to IMPACT project for the siting of upgraded Primary Healthcare to level Two (2) facilities. The land is measured 4 Plots without any encumbrance nor existing activities devoid of the presence of economic trees at no cost attached.

The voluntary donation with no money attachment was given to IMPACT PROJECT

In the presence of the witnesses below:

SIGNATURE OF THE DONATING COMMUNITY (ODOLE)

Mr./Mrs. Hon Cha Bayo James Signature/Date

Position Traditional Ruler

Phone Number (S) 08033826624

WITNESS TO THE DONATING COMMUNITY (PREFERABLY OIC)

Mr./Mrs OWOLOGBON SERAH Signature/Date

Position S/C

Phone Number (S) 08107565317

SIGNATURE OF THE RECEIVER (IMPACT PROJECT)

Mr./Mrs Olorunmaiye Ade Thwopl Signature/Date

Position PM IMPACT

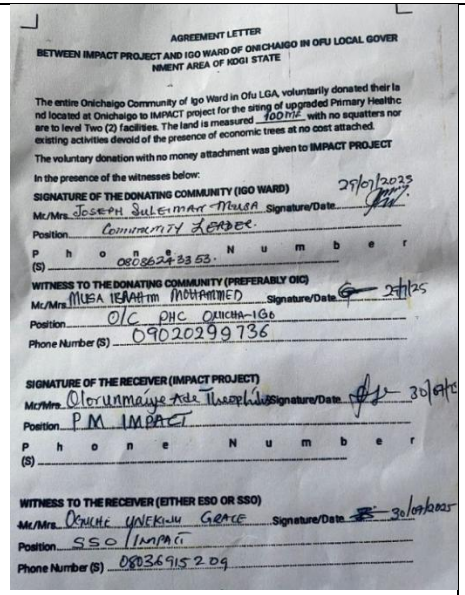
Phone Number (S) 08147707771

WITNESS TO THE RECEIVER (EITHER ESO OR SSO)

Mr./Mrs Tayo Ayoyoye Signature/Date

Position S SO

Phone Number (S) 08064768737.



AGREEMENT LETTER

BETWEEN IMPACT PROJECT AND IGO WARD OF ONICHAIGO IN OFU LOCAL GOVER NMENT AREA OF KOGI STATE

The entire Onichaigo Community of Igo Ward in Ofu LGA, voluntarily donated their la nd located at Onichaigo to IMPACT project for the siting of upgraded Primary Healthc are to level Two (2) facilities. The land is measured 100mx with no squatters nor existing activities devoid of the presence of economic trees at no cost attached.

The voluntary donation with no money attachment was given to IMPACT PROJECT

In the presence of the witnesses below:

SIGNATURE OF THE DONATING COMMUNITY (IGO WARD) 29/07/2025

Mr./Mrs. Joseph Suleiman Musa Signature/Date

Position Community Leader.

Phone Number (S) 08086243353.

WITNESS TO THE DONATING COMMUNITY (PREFERABLY OIC)

Mr./Mrs. MUSA IBRAHIM MOHAMMED Signature/Date 24/7/25

Position O/C PHC OKICHA-IGO

Phone Number (S) 09020299736

SIGNATURE OF THE RECEIVER (IMPACT PROJECT)

Mr./Mrs. Olorunmaiye Ade Thwopl Signature/Date 30/07/25

Position P M IMPACT

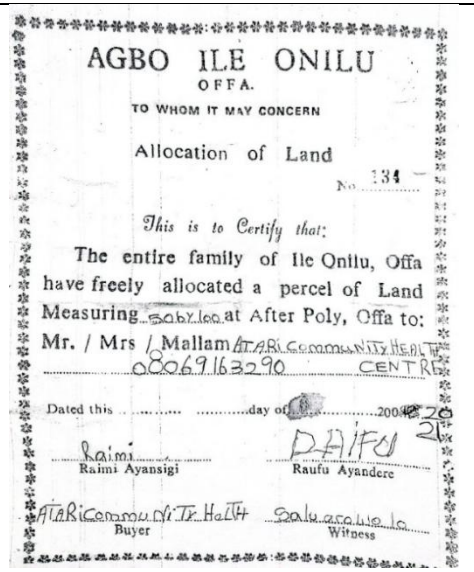
Phone Number (S)

WITNESS TO THE RECEIVER (EITHER ESO OR SSO)

Mr./Mrs. OKUCHE UNEKWU GRACE Signature/Date 30/07/2025

Position SSO / IMPACT

Phone Number (S) 08036915209



AGBO ILE ONILU

OFFA.

TO WHOM IT MAY CONCERN

Allocation of Land

No. 134

This is to Certify that:

The entire family of Ile Onilu, Offa have freely allocated a parcel of Land Measuring 50x100 at After Poly, Offa to:

Mr. / Mrs / Mallam ATARI Community Health Centre

08069163290

Dated this ..... day of 20 25

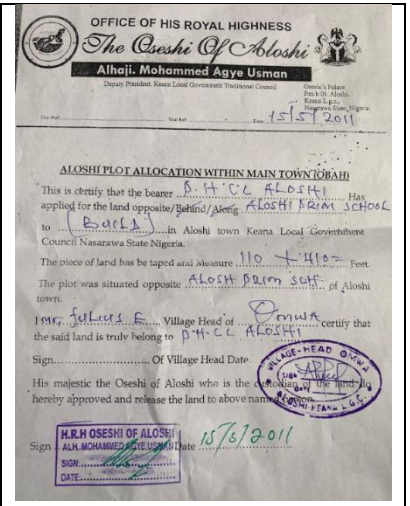
Raimi Ayansigi

Raufu Ayandere

ATARI Community Health Centre

Buyer

Witness



OFFICE OF HIS ROYAL HIGHNESS

The Oseshi Of Aloshi

Alhaji. Mohammed Agye Usman

Deputy President, Keana Local Government Traditional Council

Date 15/5/2011

ALOSHI PLOT ALLOCATION WITHIN MAIN TOWN (OBAH)

This is certify that the bearer B.H.C.C ALOSHI Has applied for the land opposite/Behind/Along ALOSHI FARM SCHOOL to (BARA) in Aloshi town Keana Local Government Council Nasarawa State Nigeria.

The piece of land has be taped and measure 110 x 110 Feet.

The plot was situated opposite ALOSHI Farm Sch. of Aloshi town.

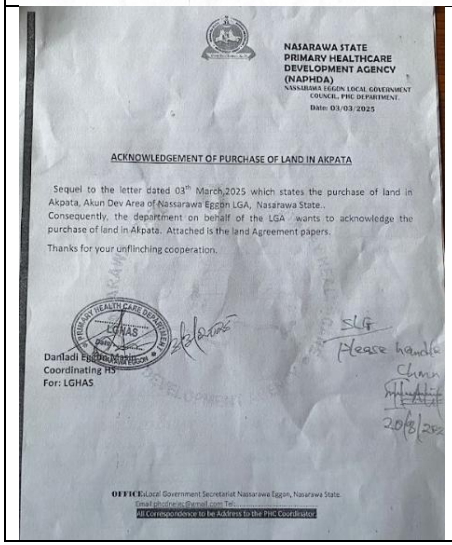
I Mr. Zakari E. Village Head of Omua certify that the said land is truly belong to B.H.C.C ALOSHI

Sign..... Of Village Head Date.....

His majestic the Oseshi of Aloshi who is the [illegible] of the land is hereby approved and release the land to above name.

H.R.H OSESHI OF ALOSHI ALH. MOHAMMED AGYE USMAN

Sign Date 15/5/2011



NASARAWA STATE PRIMARY HEALTHCARE DEVELOPMENT AGENCY (NAPHDA)

NASARAWA EGGON LOCAL GOVERNMENT COUNCIL, PHC DEPARTMENT.

Date: 03/03/2025

ACKNOWLEDGEMENT OF PURCHASE OF LAND IN AKPATA

Sequel to the letter dated 03rd March,2025 which states the purchase of land in Akpata, Akun Dev Area of Nassarawa Eggon LGA, Nasarawa State..

Consequently, the department on behalf of the LGA wants to acknowledge the purchase of land in Akpata. Attached is the land Agreement papers.

Thanks for your unflinching cooperation.

Please handle

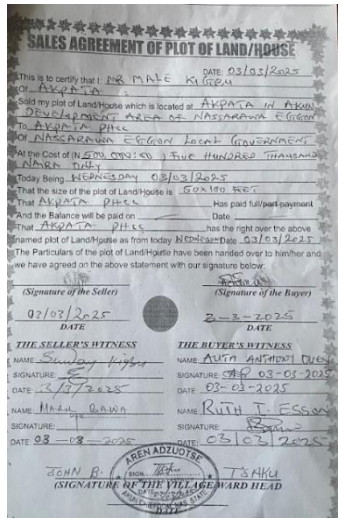
Danladi Egbon Ahmadu

Coordinating HS

For: LGHAS

OFFICE Local Government Secretariat Nassarawa Eggon, Nasarawa State.

All Correspondence to be Address to the PHC Coordinator.



SALES AGREEMENT OF PLOT OF LAND/HOUSE

DATE 03/03/2025

This is to certify that I MR MATE KIGBU

Of AKPATA

Sold my plot of Land/House which is located at AKPATA IN AKUN DEVELOPMENT AREA OF NASSARAWA EGGON

To AKPATA PHCC

Of NASSARAWA EGGON Local GOVERNMENT

At the Cost of (N 500,000:00) FIVE HUNDRED THOUSAND NAIRA ONLY

Today Being WEDNESDAY 03/03/2025

That the size of the plot of Land/House is 60X100 FEET

That AKPATA PHCC Has paid full/part payment

And the Balance will be paid on Date

That AKPATA PHCC has the right over the above named plot of Land/House as from today WEDNESDAY Date 03/03/2025

The Particulars of the plot of Land/House have been handed over to him/her and we have agreed on the above statement with our signature below:

(Signature of the Seller) (Signature of the Buyer)

02/03/2025 DATE 3-3-2025 DATE

THE SELLER'S WITNESS

NAME Sunday Ayuba

SIGNATURE

DATE 3/3/2025

NAME MARY DAWA

SIGNATURE

DATE 03-03-2025

THE BUYER'S WITNESS

NAME AUTA ANTHONY DUES

SIGNATURE AAD 03-03-2025

DATE 03-03-2025

NAME RUTH T. ESSON

SIGNATURE

DATE 03/03/2025

JOHN R. ADZUOTSE TSAKU

(SIGNATURE OF THE VILLAGE WARD HEAD)

NASARAWA STATE

GADABUKE DEVELOPMENT AREA EDU. AUTHORITY

Ref:

All correspondence should be address to the education secretary

OFFICE: L.E.A.DEV GADABUKE Nasarawa State

Date: 22/09/2025

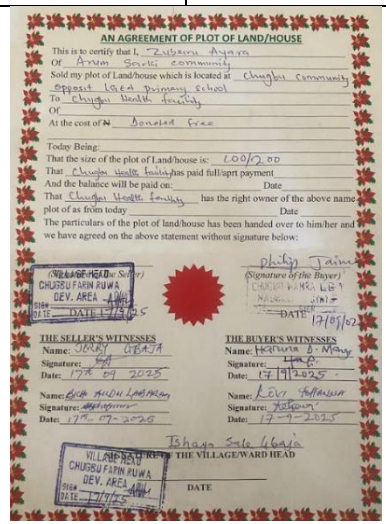
The Director,
Primary Health Care Department,
Gadabukee Development Area,
Toto Local Government.

DONATION OF PART OF LAND

In respect to the above subject matter, Nakuse Community in conjunction with Local Education Authority Gadabuke have agreed to donate part of LEA Nakuse Central Primary school land to Nakuse Primary Health Care (PHC) to build staff quarters for IMPACT PROJECT.

Muhammad E. Hussaini
(HOS Physical Planning)
For: Education Secretary

"EDUCATION FOR ALL IS THE RESPONSIBILITY OF ALL"



AN AGREEMENT OF PLOT OF LAND/HOUSE

This is to certify that I, Zubairu Ayuba

Of Ayuba South community

Sold my plot of Land/house which is located at Chugbo community opposit Lgea primary school

To Chugbo Health facility

Of

At the cost of ₦ Donated Free

Today Being:

That the size of the plot of Land/house is: 100/100

That Chugbo Health facility has paid full/aprt payment

And the balance will be paid on: Date

That Chugbo Health facility has the right owner of the above name plot of as from today Date

The particulars of the plot of land/house has been handed over to him/her and we have agreed on the above statement without signature below:

(Signature of the Seller) (Signature of the Buyer)

DATE 17/9/2025 DATE 17/09/2025

THE SELLER'S WITNESSES

Name: JOHN GBATA

Signature:

Date: 17/09/2025

Name: ENOCH ALIDU LABARAN

Signature:

Date: 17-09-2025

THE BUYER'S WITNESSES

Name: Hannah B. Mary

Signature:

Date: 17/9/2025

Name: REV. TSAHAYA

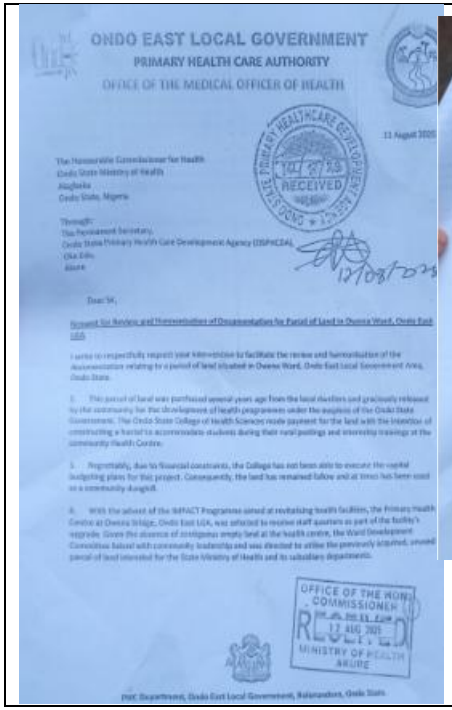
Signature:

Date: 17-9-2025

Tshaya Sale Ubaja

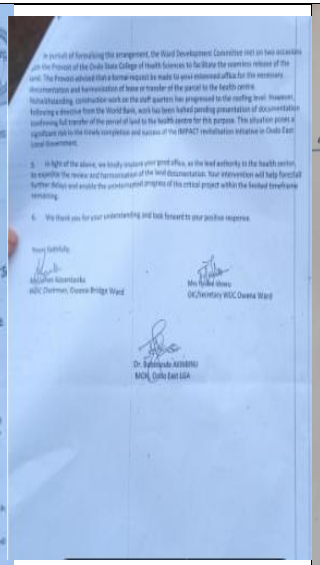
THE VILLAGE/WARD HEAD

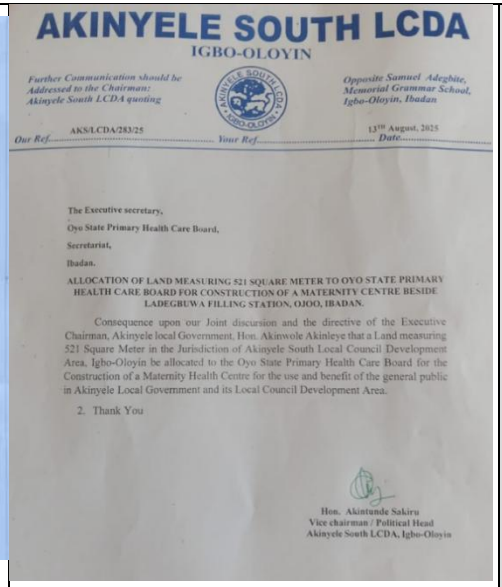
DATE



ONDO EAST LOCAL GOVERNMENT
PRIMARY HEALTH CARE AUTHORITY
OFFICE OF THE MEDICAL OFFICER OF HEALTH

RECEIVED





AKINYELE SOUTH LCDA
IGBO-OLOYIN

Further Communication should be Addressed to the Chairman: Akinyele South LCDA quoting

Opposite Samuel Adegbite, Memorial Grammar School, Igbo-Oloyin, Ibadan

Our Ref. AKS/LCDA/283/25 Your Ref. Date 13TH August, 2025

The Executive secretary,
Oyo State Primary Health Care Board,
Secretariat,
Ibadan.

ALLOCATION OF LAND MEASURING 521 SQUARE METER TO OYO STATE PRIMARY HEALTH CARE BOARD FOR CONSTRUCTION OF A MATERNITY CENTRE BESIDE LADEGBUWA FILLING STATION, OJOO, IBADAN.

Consequence upon our Joint discursion and the directive of the Executive Chairman, Akinyele local Government, Hon. Akinwole Akinleye that a Land measuring 521 Square Meter in the Jurisdiction of Akinyele South Local Council Development Area, Igbo-Oloyin be allocated to the Oyo State Primary Health Care Board for the Construction of a Maternity Health Centre for the use and benefit of the general public in Akinyele Local Government and its Local Council Development Area.

2. Thank You

Hon. Akintunde Sakiru
Vice chairman / Political Head
Akinyele South LCDA, Igbo-Oloyin