

FEDERAL REPUBLIC OF NIGERIA

**Community and Social Development Project Additional
Financing**

(CSDP AF)

Environmental and Social Management Framework (ESMF)

Final Report

February 2014

EXECUTIVE SUMMARY

Background

The thrust of the Community and Social Development Project (CSDP) is to contribute to the realization of the Nigerian government's strategy for poverty reduction by improving the welfare and living conditions of many poor and vulnerable communities in most states of Nigeria. The project is supported by the World Bank's Country Partnership Strategy which identified the need to continue to focus on community empowerment and local level development as a key element of the overall strategy for poverty reduction and development in the Country. CSDP was planned to be implemented from 2009 to 2013. However, the Federal Government of Nigeria has requested Additional Financing (AF) of \$150 million for the Project and extension of closing date in the first instance for one year and the rest of the tenure of the additional financing be agreed during the preparation. The World Bank had since extended the closing date to December 31, 2014. This ESMF provides the guidelines for the mainstreaming of environmental issues into the CSDP AF project activities.

Project Description and Objectives

The initial consultation suggest that the Project Development Objective (PDO) for the CSDP AF will remain unchanged as the original PDO- "to sustainably increase access of poor people to social and natural resource infrastructure services", but the key performance indicators (KPIs) will be revised. The CSDP AF KPIs will put some emphasis on support to vulnerable and disenfranchised households and individuals, expand scope of assistance to such households beyond public goods (schools, health center, water etc.). It will also include demand side support i.e. a safety net. The use of a community managed approach and emphasis on local government active partnership with community groups will be retained and strengthened during CSDP AF period. The new emphasis on safety net will result in an additional component, for 'vulnerable groups' transfers, to the original design. In essence, the additional financing will now have 4 components:

- *Component 1: Coordination and Program Support Component (Federal and State Level)*
- *Component 2: LGA/Sectoral Ministries Capacity and Partnership building Component*
- *Component 3: Community-Driven Investment Component*
- *Component 4: Vulnerable Groups livelihood investment grants/transfers component.*

Rationale for the ESMF

While CSDP AF micro-projects are not expected to generate significant adverse environmental effects, some community and local government investments may result in negative consequences if appropriate mitigation measures are not implemented. In addition, the cumulative environmental impact of many small-scale investments supported by the project across the country may be significant. The long term success of these investments is also closely associated with sustainability and minimizing potential negative environmental impacts since the poor are often most directly dependent on their natural resource base for supporting their economic livelihood. The purpose of this study is thus to provide clear and systematic guidelines and to ensure that environmental and social sustainability of the CSDP AF funded projects are achieved through application of safeguards measures on environmental and social issues during project implementation.

Scope of the ESMF

The scope of work is to revise the current CSDP Environmental and Social Management Framework (ESMF), which represents a framework for screening, monitoring, and mitigating potential impacts, in order to improve decision making and to ensure that the structures, either new constructions or rehabilitations being considered under CSDP AF project are environmentally and socially sound and

sustainable and also take into consideration mitigation measures for possible adverse or negative effect on stakeholders.

Policy, Legal and Administrative Framework

The requirement for an Environmental Assessment and Social Management Plan is in compliance with the Federal Republic of Nigeria's (FRN) laws and World Bank policies that are geared towards achieving sustainable development goals through proper and adequate care for the environment, health and social well-being of her citizens. The World Bank also requires framework that will guide the conduct of environmental assessment of its assisted projects based on the safeguards triggered. However, considering the type of the planned investments vis-à-vis the requirements of the Bank Safeguard policies as well as the lessons learned from environmental issues that emanated from current CSDP as documented in the just concluded environmental audit, the following Bank policies apply to CSDP AF; Environmental Assessment (OP4.01); Involuntary Resettlement (OP/BP 4.12); Natural Habitats (OP 4.04) and Forests (OP 4.36).

Potential Environment and Social Impacts

The project anticipates both positive and negative impacts with the positive impacts far outweighing the negative impacts. The positive impacts will amongst other; bring effective and lasting improvement in the livelihoods of people, and can lead to better use and protection of the natural resource base; promotes the decentralization process through support to capacity building interventions at the local government levels; increase access to markets and social services, such as health care and education; improve conservation of natural habitats and biodiversity; increased income and employment opportunities thus reducing social disruptions; improvement in people's well-being and livelihoods, and promote equitable development and direct positive impacts on vulnerable groups livelihoods. The anticipated negative impacts includes: creating open access for forest exploitation; may undermined NGOs and development agencies with considerable rural development experience; project may attract outside immigrants to already stress environment and further increase pressure on existing resources and possibly increase land-related conflicts and individual benefiting from component 4 may utilized improved livelihood condition to increase damage to natural resources and degrade the environment.

Environmental and Social Mitigation Principles

Impacts at pre-Construction Phase include: Land acquisition and Community perception of the project. Potential impacts during Construction Phase include: Flooding, Soil impact, Land use, Air Quality, Water Quality, Increased runoff and vegetation clearance. Potential impacts during implementation phase include: Maintenance operations, Air quality issues, Water quality issues, Traffic and transportation. Measures were developed to mitigate the identified impacts. Other identifiable components of the environment, social sphere and health implications were also considered with respect to the projects implemented. Best available control technology employing suitable prevention and mitigation measures including: education of local population; ensure planning, design, maintenance of infrastructure is appropriate to local needs, traditions culture and desires; ensure sufficient community participation and organization of effective planning and management of infrastructure; ensure the use of quality and locally accessible materials are used and avoid infringing on protected areas, critical habitats or areas with significant biodiversity (e.g. wetlands) and areas of soil, slope or geological instability

Cumulative Impact Monitoring

CPMCs and LGRCs with the support of the MFTs will be responsible for the day to day monitoring of sub-projects and reporting of feedback throughout the life of the sub-project. The monitoring and reporting will be done by members of the respective Community Project Management Committee (CPMC) of the communities/villages and the environmental specialist (or official responsible for environmental issues) at the local government councils who will be trained. The SA will be involved in

monitoring through periodic visit to sup-project sites. The FPSU and the World Bank will also be involved missions and systematic environmental assessment.

Consultation with Stakeholders

Consultations were held in several states including Kebbi, Gombe, Abia and Niger and at the national level with key stakeholders including relevant government ministries and agencies.

ESMF Implementation

The sub-projects funded by CSDP AF will follow environmental and social screening process using the guidelines and procedures stated in the CSDP AF ESMF. The guiding principle for implementation of the sub-projects was based on CDD Cycle which involves identification, appraisal, approval, launching, implementation, supervision, monitoring and evaluation, inauguration /commissioning. Therefore guidelines in the ESMF will be utilized by appropriate level of CSDP AF structure and institutional arrangements during sub-project implementation.

Estimated Budget for Implementing the ESMF

A cost estimate of about *Seven Hundred and Forty Thousand US dollars (\$740,000: 00)* was estimated for the implementation of this ESMF.

1 INTRODUCTION

The thrust of the Community Social Development Project (CSDP) is to contribute to the realization of the Nigerian government's strategy for poverty reduction by improving the welfare and living conditions of many poor and vulnerable communities in most states of Nigeria. The project is supported by the World Bank's Country Partnership Strategy which identified the need to continue to focus on community empowerment and local level development as a key element of the overall strategy for poverty reduction and development in the Country. CSDP was planned to be implemented from 2009 to 2013. However, the Federal Government of Nigeria has requested Additional Financing (AF) of \$140 million for the Project and extension of closing date in the first instance for one year and the rest of the tenure of the additional financing be agreed during the preparation. The World Bank had since extended the closing date to December 31, 2014.

For the CSDP AF, there will be no changes in the environmental category of the credit; therefore, the additional financing is a Category B project, as the environmental and social impacts of the project are expected to be minimal, site specific and manageable to an accepted level. The range, scale, locations and number of micro-projects as part of community development initiatives will emerge from the participatory process. The parent Environmental and Social Management Framework (ESMF) and Resettlement Policy Framework (RPF) prepared by the borrower for the CSDP and disclosed in-country and at the Bank Info shop will still apply, but have been updated especially in view of the additional Component 4 – Vulnerable Groups Livelihood Investments Grants/Transfers. Also the recent Environmental Audit of the CSDP in all the participating States has provided additional information for the revision including the need to trigger OP 4.36 – Forests and OP 4.04 – Natural Habitat, thus the need for this updated CSDP ESMF. The proposed CSDP AF would trigger World Bank safeguard policies OP 4.01 (Environmental Assessment), and related guidelines including OP 4.04 (Natural Habitats); OP 4.12 (Involuntary Resettlement) and OP 4.36 (Forests).

1.1 Scope of Work

The scope of work is to revise the current CSDP Environmental and Social Management Framework (ESMF), which represents a framework for screening, monitoring, and mitigating potential impacts, in order to improve decision making and to ensure that the structures, either new constructions or rehabilitations being considered under CSDP AF project are environmentally and socially sound and sustainable and also take into consideration mitigation measures for possible adverse or negative effect on stakeholders.

1.2 Study Approach and Methodology

The study was conducted by the consultant using the following approach and methodology; Documents consulted in the process of preparing the CSDP AF ESMF study includes: CSDP ESMF; CSDP Environmental Safeguards Audit prepared in 2013; Fadama III Project ESMF; the ESMF of RAMP; the general environmental management conditions for construction contracts; the Constitution of the Federal Republic of Nigeria; numerous relevant Federal, State, and local laws, regulations, decrees, acts, policies and guidelines, World Bank Safeguards Policies and other relevant documents. However, the experience of the consultant in the recent Environmental Audit of the CSDP in all the participating States was highly useful. Consultations were held in several states including Kebbi, Niger, Gombe and Abia.

2 BASELINE DATA

2.1 The Bio- Physical Environmental Features

Nigeria is situated in West Africa lying between latitudes 4°00' N and 14°00' N and longitudes 2°50' E and 14°45' E, bordered to its south by the Gulf of Guinea for about 850km, by the Republic of Benin to the West for 773km, Republic of Niger to its North for 1497km, Chad at its North Eastern Boundary (Lake Chad water boundary) for 87km and Cameroon to its East for 1,690km (see map below)

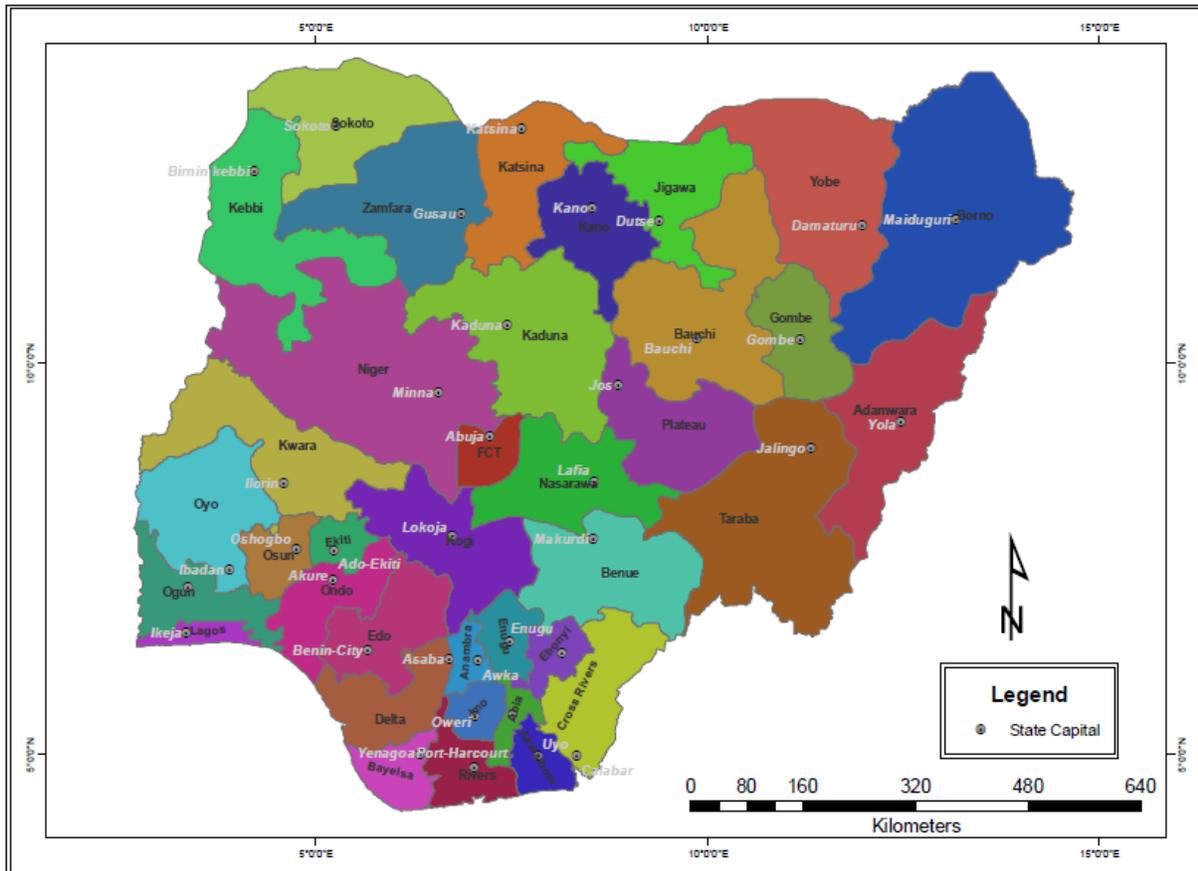


Figure 2.1: Map of Nigeria showing the 36 states of Nigeria

Nigeria has a total area of 923,768 sq. km of which the total land area is 913, 768 sq. km and 10,000 sq. km is water. Nigeria is blessed with abundant water resources estimated at 226 billion m³ of surface water and about 40 billion m³ of ground water. The main characteristics of the biological, physical and socio-economic environment of the project area are summarized below.

2.1.1 Physical Environment

2.1.1.1 Climate

Nigeria's climate varies from arid in the north, tropical in the centre and equatorial in the south. The climate is largely controlled by prevailing winds and nearness to the Atlantic Ocean. The two dominant air masses are the dry wind from the Sahara and the wet wind from the Atlantic Ocean. Marginal

alterations have been recorded due to landform characteristics, configuration of surrounding shoreline and the generally flat topography of the country.

2.1.1.2 Rainfall

Rainfall is the single most important element for defining the climatic seasons in the tropics. Hence, Nigeria has two dominant seasons; the wet and the dry seasons. Rainfall throughout Nigeria depends on the interaction of the tropical maritime air mass and the tropical continental mass which meet along the inter-tropical convergence zone (ITCZ). The annual average rainfall around the country is between 2000mm and 3000mm.

2.1.1.3 Temperature

Nigeria's climate is characterized by relatively high temperatures throughout the year.

The average annual maximum varies from 35°C in the north to 31°C in the south; the average annual minimum from 23°C in the south to 18°C in the north. On the Jos plateau and the eastern highlands altitude makes for relatively lower temperatures, with the maximum no more than 28°C and the minimum sometimes as low as 14°C.

2.1.1.4 Wind

Two principal wind currents affect Nigeria. The south-westerlies dominate the rainy season of the year while north-easterlies dominate the dry season. Depending on the shifts in the pressure belts in the Gulf of Guinea, these winds are interspersed respectively by south-easterlies and north-westerlies in different parts of the year. The wetter winds prevail for more than 70% due to the strong influence of the breeze from the Atlantic Ocean

Mean annual wind speed varies between 2 to 6 m/s. Speeds in dry season (November -March) are lower. In the wet season (April–October), daily average speed could rise to 15 m/s. Values of up to 25 m/s are sometimes experienced due to inducement by convective rainfall activities and relative diffusion.

2.1.1.5 Ambient Air Quality

Generally, air quality in the area complies with regulatory standards. Although, slight variations are noticed in major industrial cities like Lagos, Ibadan, Aba, Kano, Port Harcourt and Kaduna. The Federal Ministry of Environment (FMEnv) adopted the WHO standards (Table 3.1) as the national standards for gaseous emissions against which air quality parameters monitored are compared in order to ascertain its "cleanliness".

Table 2.1: Nigerian Ambient Air Quality Standard

Air Pollutants	Emission Limits
Particulates	250 (µg/m ³)
SO ₂	0.1 (ppm)
Non-methane Hydrocarbon	160 (µg/m ³)
CO	11-4 (µg/m ³) or 10 (ppm)
NO _X	0.04-0.06 (ppm)
Photochemical Oxidant	0.06 (ppm)

Source: FME 1991

Table 2.2: Air Quality Classification Based on TSP Values

Range of TSP Values (Pg/m ³)	Class of Air Quality
0 – 75	High Quality
76 – 230	Moderate Quality
231 – 600	Poor Quality

Source: Jain, et. al (1976)

Geology

Nigeria lies on the southern portion of the West African Craton. The geological setting comprises broadly crystalline basement complex rocks and sedimentary formations. They occur in equal proportions around the country. The former are highly mineralized and give rise to soils of high nutrient status, although variable from place to place. The latter are found in the south-east, north-east and north-west of the country, and give rise to sandy and less variable soils that are deficient in plant nutrient.

Topography

Nigeria has varying landforms and much of the country is dominated by plains, generally less than 610m above sea level. The eastern border with the Republic of Cameroun is lined by an almost continuous range of mountains which rise to about 2,419m at Chappal Waddi, the highest known point in Nigeria.

In the North, the Jos Plateau rises abruptly from a general level of about 609.5m in the Hausa Plains to an average level of some 1,219m but reaches 1,781.6m in Shere Hills. The area west of the River Niger is dominated by the plain, which rises gently from the coast northwards to the area of crystalline rocks where inselbergs rise abruptly above the surrounding plains. The Idanre Hills, the highest point of these inselbergs, rises to about 981m above sea level. In general, the land surface of the country could be classified into three broad physical units or major relief features namely: the plains; the highlands; the troughs and the river valleys.

Soils Characteristics

The broad pattern of soil distribution in the country reflects both the climatic conditions and the geological structure; heavily leached, reddish-brown, sandy soils are found in the south, and light or moderately leached, yellowish-brown, sandy soils in the north. The difference in color relates to the extent of leaching the soil has undergone. Nigeria soils are highly weathered and are characterized by light texture, low pH, low organic matter, low potassium levels, variable phosphorous levels with clay contents ranging between 7%-43%.

Surface and Ground Water Hydrology

Nigeria has two major rivers, the Niger and the Benue, which traverse the northwest and northeast portion of the country, then merge at Lokoja before draining down to the Atlantic. There are several other rivers and quite a number of minor streams and rivulets that crisscross the entire Nigerian land mass. These include the Ogun, Oshun, Imo, Cross, Osse, Nun and the Anambra rivers in the south and the Kaduna, the Gongola, Sokoto – Rima and the Hadeija in the North.

Generally the water quality in the rivers of Nigeria is very good. The average electrical conductivity in the main rivers ranges between 48-65 Umhos/cm² and the total dissolved solids (TDS) concentration is about 100mg/l. The pH is less than 6.5, although higher values were reported in swamps and floodplains with levels of 100-150 Umhos/cm². These rivers are also low in nutrients, with an average nitrogen content of 0.32mg/l and a total phosphorous content of 0.1 mg/l. The data indicate water of high quality according to FMEnv limits.

2.1.2. Biological Environment

Fauna

Animals found in both forest and savannas include leopards, golden cats, monkeys, gorillas, and wild pigs. Today these animals can be found only in protected places as the Yankari Park, Gashaka Gumti Park, and Cross River Park. Rodents such as the squirrel, porcupine, and cane rat constitute the largest family of mammals. The northern savannah abounds in guinea fowl. Other common birds include quail, vultures, kites, bustards, and gray parrots. The rivers contain crocodiles, hippopotamuses, and a great variety of marine life.

In the rain forest, few large animals notably gorillas, chimpanzees, baboons and monkeys are present. Crocodiles, lizards, and snakes of many species are also present. Hippopotamuses, elephants, giraffes, leopards, and lions now remain only in scattered localities and in diminishing number. Wildcats, however, are more common and widely distributed. Wildlife in the savanna includes antelope, lions, leopards, gazelles, and desert hyenas. Nigeria also abounds in bird life with a great number of species being represented.

Flora

Vegetation varies dramatically in relation to climate, soil, elevation, and human impact on the environment. In the low-lying coastal region, mangroves line the brackish lagoons and creeks, while swamp forest grows where the water is fresh. Farther inland, this vegetation gives way to tropical forest, with its many species of tropical hardwoods, including mahogany, iroko, and obeche.

North of the forest is the Guinea Savannah, a region of tall grasses and trees. The southern margin of the Guinea Savannah has been so altered by humans that it is also called the derived savannah. Beyond the Guinea savannah lies the Sudan Savannah, a region of shorter grasses and more scattered, drought-resistant trees such as the baobab, tamarind, and acacia. In the northeastern corner of Nigeria, the very dry semi-desert Sahel Savannah persists.

2.2 The Social Environmental Features

2.2.1 The Demographics

According to the latest estimates, the population of Nigeria is approximately, 174,507,539 (July 2013 est) 155million with average population density of about 160 persons per sq. km. This makes Nigeria the largest country by population, in Africa. The annual average growth rate is about 2.54% (2013 est.) and the urban population represented 49.6% of total population (2011) and the rate of urbanization is about 3.75% annual rate of change (2010-15 est) The illiteracy rate, which is an estimate of the percentage the population over 15years old that have not completed a primary school education level, is about 35%. (World Fact Book, CIA)

Table 2.3: Demographic Data

	1985	1990	1995	2000	2005	2010	2015	2020	2025
Total population (000s)	83,068	96,154	111,721	128,786	147,610	168,369	190,922	214,551	238,397
Urbanization Level (%)	30.7	35.0	39.6	44.0	48.2	52.0	55.4	58.2	60.9
Urban population (000s)	25,527	33,664	44,184	56,651	71,121	87,557	105,699	124,888	45,217
Urban population growth rate (%)		5.53	5.44	4.97	4.55	4.16	3.77	3.34	3.02
Rural population growth rate (%)		1.65	1.55	1.32	1.17	1.1	1.06	1.02	0.77

Source: UN Habitat

One projection of Nigeria's population estimates that it will reach the level of 338 million by the year 2050. If this estimate and other country estimates are correct, Nigeria would move from 10th most populous country in the world to the 4th most populous country in a short span of just under 50 years. The tables below place Nigeria's rapid forecasted growth in global perspective.

Countries Ranked by Population 2000 (in millions)

1 China	1,256
2 India	1,017
3 United States	275
4 Indonesia	219
5 Brazil	174
6 Russia	146
7 Pakistan	141
8 Bangladesh	129
9 Japan	126
10 Nigeria	123

Countries Ranked by Population 2050 (in millions)

1 India	1,707
2 China	1,322
3 United States	394
4 Nigeria	338
5 Indonesia	331
6 Pakistan	260
7 Brazil	228
8 Bangladesh	211
9 Congo (Kinshasa)	184
10 Mexico	167

The real significance of Nigeria's demographic situation is that it simultaneously has a large population and one of the highest rates of growth in the world, causing its projection to move up so rapidly in total population. Many unknown factors could alter the above estimate. AIDS is one factor that could have a dramatic impact on Nigeria's future demographics. While AIDS is not the critical national health concern that it is in other sub-Saharan countries, it may grow to become a problem of great concern.

Rural – Urban migration in Nigeria, like in most other countries is fuelled by the pursuit for increased economic/ livelihood opportunities. Today, it is estimated that 45% or 58.5 million people form the urban population of Nigeria. 68.8% or 40.3million of this urban population are considered to be low-income earners. This pressure has forced changes in urbanization patterns, for instance, giving rise to a significant increase in peri-urban growth centers, as migrants pour daily into the cities to work but can only afford to live in new sprawling growth centers outside these cities, often where basic infrastructure and social services are very poor.

2.2.2 Ethnic Groups and Religion

Nigeria, which is Africa's most populous country, is composed of more than 250 ethnic groups, the larger of which are the Hausa and Fulani, who are predominantly from the North represent approximately 29% of the population, the Yoruba, predominantly from the South (South West) and represent approximately 21% of the population and the Igbo, predominantly from the East represent about 18% of the population. The other large groups are the Ijaw with about 10%, the Kanuri with about 4%, the Ibibio with about 3.5% and the TIV with about 2.5%. The Middle Belt region of Nigeria shows the greatest degree of ethnic diversity, particularly in Adamawa, Taraba and Plateau States. The religious groups include Muslims, Christians and the indigenous beliefs.

English is the official language while the vast majority of the population conducts commercial activities in their ethnic language. The literacy level of the population is 57.1% (male: 67.3%, female: 47.3%). Predominantly the people are Muslims (50%) and Christians (40%) with few animists (10%).

2.2.3 Land Use Pattern

The estimated land area of Nigeria is 924,000 km². Land use varies based on location and the needs of the community. However, the different uses of land revolve around agriculture, industry and social needs such as the provision of infrastructure. Recent data shows that about 60% of the land area of Nigeria is under various forms of food (crop and animal) production and forest plantation.

2.2.4 Land Tenure

The Land Use Decree of 1978 vests all land in the state through the office of the governor. Land is to be held in trust and administered for the use and common benefit of all Nigerians according to the provisions of the Act. By this legal instrument, the state replaced the traditional institutions of traditional rulership and chieftaincy in their roles as keepers of communal land.

Control and management of land in urban areas is the responsibility of the state governor, while all other land (rural, public, etc.) is the responsibility of the Local Government of the area. The governor is empowered to designate certain areas as urban land and to grant statutory rights of occupancy of fixed periods and rights of access to any person, subject to rental arrangements fixed by and payable to the state. The local government can grant a customary right of occupancy to land in the local government area (LGA) to any person or organization for agriculture, grazing, residential or other purposes.

2.2.5 Public Health Features

The increase in urban and peri-urban population over the years, coupled with the significant decline in the performance of the State Water Agencies to provide potable water (it is estimated that only 50% of the urban and 20% of the peri-urban have access to reliable water supply), and with poor or no acceptable sanitation or drainage infrastructure in many of these areas, the prevalence rate for diseases such as diarrhoea, malaria, dysentery and other serious health conditions are high.

2.2.6 Poverty

According to the World Bank, Country at a Glance report, 2001, the gross national income (GNI) per capita of Nigeria is US\$290, which is significantly lower than the average of US\$470 for sub Saharan Africa (SSA).

It is estimated that 60% of the total population of Nigeria live below the poverty line. The average percentage of the urban poor (i.e. % of population below national poverty line) is a staggering 45% compared with the SSA average of 32%

2.2.7 Economics

The Nigerian economy rests on two pillars: oil/gas and agriculture. Both sectors contributes 65% - 70% of GDP, while the secondary sector (manufacturing contributes about 7% and the tertiary sector (transport, trade, housing etc) contributes about 25%.

Nigeria's major industries are located in Lagos, Sango Otta, Port Harcourt, Ibadan, Aba, Onitsha, Calabar, Kano, Jos and Kaduna.

2.2.8 Facilities

The main transportation means in Nigeria is the road. Water transportation is fairly developed in some coastal areas. Air transportation is considered fair with major airports in Lagos, Abuja, Port Harcourt, Kano and Kaduna. The railway sector has experienced a major decline in the last decades but efforts are being made to revive it and extend it geographical links.

Electricity is supplied through the national grid. Though the power supply is still erratic, significant progress in improving the power supply situation has been made in recent years; and government is promoting the development of independent power supply to augment the current inadequate supply. Privatization of key infrastructures in the sector has been completed.

With regard to educational facilities, Nigeria is reasonably served. There are over 80 universities consisting of federal, state and private owned. High schools in most states are insufficient and are in dilapidated state, except for states in the southern part of the country.

The Federal Government has just concluded refurbishing existing tertiary health institutions nationwide. There is at least 1 primary health care institution in each of the 774 local government areas.

3 DESCRIPTION OF PROPOSED PROJECT

The initial consultation suggest that the Project Development Objective (PDO) for the CSDP AF will remain unchanged as the original PDO- “to sustainably increase access of poor people to social and natural resource infrastructure services”, but the key performance indicators (KPIs) will be revised. The CSDP AF KPIs will put some emphasis on support to vulnerable and disenfranchised households and individuals, expand scope of assistance to such households beyond public goods (schools, health center, water etc.). It will also include demand side support i.e. a safety net. The use of a community managed approach and emphasis on local government active partnership with community groups will be retained and strengthened during CSDP AF period.

Components: The new emphasis on safety net will result in an additional component, for vulnerable groups’ transfers, to the original design. In essence, the additional financing will now have 4 components:

Component 1: Coordination and Program Support (Federal and State Level)

This component will involve Federal and State level coordination and the Federal unit will in focus on CDD policy and strategy assessment and formulation, technical support, monitoring and impact evaluation.

Component 2: LGA/Sectoral Ministries Capacity and Partnership building

The State Agencies/PMUs will fund and support the process of strengthening the capacity of sectoral ministries and local government in programme administrations and accountability vis-à-vis local communities. Funds will be made available for capacity building and skills training as well as essential facilities for specific local government officials – community development workers – on a demand led basis to enable them to facilitate the activities of community groups and also manage local government subprojects. Participatory planning and Training of Trainers for community capacity building are key elements of this component. This will also include safeguards management and monitoring related training.

Funds will also be provided to qualifying LGAs to finance social and natural resource management infrastructure benefiting more than one community. These sub-projects will be identified through a participatory planning process with the communities, and complementary to the CDPs. The subprojects will be implemented, managed and maintained by the LGA in partnership with the communities.

Component 3: Community-Driven Investment

The major role of the State Agencies will be funding Community Development Plans or projects proposals, along with the necessary awareness/sensitization, training, and supervision of community micro-projects. In addition, to the micro-projects that are socioeconomic infrastructure, the CSDP at the State level will fund natural resource management/environmental initiatives.

Micro-projects that may be contained in eligible CDPs include rehabilitation, extension or construction of primary schools, health centres, water points, reservoirs and sanitation services; rehabilitation or repair of feeder road, small bridges, and other basic transport infrastructures; and small socio-economic infrastructure for community use (public goods) such as markets and storage or natural resource management facilities.

More than 70% of the funds in this component will be devoted to funding of CDPs produced by community groups.

List of sub-projects eligible for financing under CSDP AF

- Rural roads (Rehabilitation of rural feeder roads)
- Water Supply and sanitation – bore holes, hand pumps, reticulation etc.
- Waste disposal and management
- Construction of markets (small stalls, shelters for stalls etc.)
- Multipurpose community centers/halls/civic centers
- Rural Electrification
- Construction or rehabilitation of health centres
- Rehabilitation or construction of new school building
- Erosion control measures, afforestation, community woodlots/forestry

List of sub-projects not eligible for financing under CSDP AF

- Construction of Dams (especially large scale dams)
- Commercial logging
- Acquisition of land (whether individually or communally owned)
- Construction or rehabilitation of places of worship
- Natural Resource Management (NRM) productive investments including income generation activities through sales and marketing of natural resources and irrigation and drainage (e.g. irrigation and drainage, agroforestry).
- NRM governance including land reform and cadastre and strengthening or reforming of NRM related institutions, regulation and policies.

In essence this component handles only public good infrastructures and services that has no exclusion practice i.e. all members of the community (public) has user right

Component 4: Vulnerable Groups livelihood investment grants/transfers

This component will use the same approach and project cycle as component 3. It is more targeted and would apply to specific individuals and groups (vulnerable, deprived, physically challenged etc.) and also the goods or services may not always be purely social and could be socio-economic. Such micro-projects would include: specialized skills centers, classrooms, health centers, specialized tools and equipment, one time start-up grants into drug revolving funds, scholarship funds or other welfare funds for vulnerable groups, etc.

4 DESCRIPTION OF THE WORLD BANK ENVIRONMENTAL AND SOCIAL SAFEGUARDS POLICIES AND TRIGGERS

This ESMF has been designed so that all micro-projects investments under the CSDP AF will comply with all Federal, State and local laws of Nigeria and the Environmental and Social Safeguard Policies of the World Bank. In this chapter, the Bank's safeguards policies and their applicability are discussed and in the subsequent chapter those of Nigeria are presented.

The World Bank Safeguard Policies are;

1. Environmental Assessment (OP4.01, BP 4.01, GP 4.01)
2. Natural Habitats (OP 4.04, BP 4.04, GP 4.04)
3. Forests (OP 4.36, GP 4.36)
4. Pest Management (OP 4.09)
5. Cultural Property (OPN 11.03)
6. Indigenous Peoples (OD 4.20)
7. Involuntary Resettlement (OP/BP 4.12)
8. Safety of Dams (OP 4.37, BP 4.37)
9. Projects on International Waters (OP 7.50, BP 7.50, GP 7.50)
10. Projects in Disputed Areas (OP 7.60, BP 7.60, GP 7.60)

Considering the type of the planned investments vis-à-vis the requirements of the Bank Safeguard policies as well as the lessons learned from environmental issues that emanated from current CSDP as documented in the just concluded environmental audit, the following Bank policies apply:

1. Environmental Assessment (OP4.01, BP 4.01, GP 4.01)
2. Involuntary Resettlement (OP/BP 4.12)
3. Natural Habitats (OP 4.04, BP 4.04, GP 4.04)
4. Forests (OP 4.36, GP 4.36)

Notwithstanding, since the exact location of the investments was not known at the time of preparation of the CSDP AF, and the possibility of component 4 triggering other banks policies during implementation other bank policies may apply and not all policies selected above may apply simultaneously.

Therefore, a complete description of the Bank safeguards and their triggers for applicability can be found on the World Bank's official web site www.worldbank.org and summarized in Annex 1.0.

4.1 Environmental Assessment (OP4.01)

This policy requires environmental assessment (EA) of projects/investments proposed for Bank financing to help ensure that they are environmentally sound and sustainable, and thus improve decision making. The EA is a process whose depth and type of analysis depend on the nature, scale, and potential environmental impact of the activities proposed for funding under the CSDP. The EA process takes into account the natural environment (air, water, and land): human health and safety; social aspects (involuntary resettlement, indigenous peoples, and cultural property) and trans-boundary and global environmental aspects.

The environmental and social impacts of the CSDP will come from the activities and investments to be made under Component 3 of the project. However, since the exact technical details and location of the sub-projects investments will not be identified before appraisal of this project, the EA process calls for the FGN, to prepare an Environmental and Social Management Framework (ESMF) report which will establish a mechanism to determine and assess future potential environmental and social impacts of the

State's Project Implementation Agency (SA) project investments under the proposed CSDP, and then to set out mitigation, monitoring and institutional measures to be taken during implementation and operation of the project investments to eliminate adverse environmental and social impacts, offset them, or reduce them to acceptable levels.

OP 4.01 further requires that the ESMF report must be disclosed as a separate and stand alone document by the FGN and the World Bank as a condition for appraisal. The disclosure should be both in Nigeria where it can be accessed by the general public and at the Infoshop of the World Bank and that the date for disclosure must precede the date for appraisal of the project.

4.2 Involuntary Resettlement (OP/BP 4.12)

Significant efforts are to be made in the design and screening stages of proposed SA's micro-project investments, to avoid impacts on people, land, property, including people's access to natural and other economic resources, as far as possible. Notwithstanding, land acquisition, compensation and resettlement of people seems inevitable for certain types of investments on certain occasions. These social issues are of crucial concern to the FGN and the Bank as its impact on poverty, if left unmitigated, is negative, immediate and widespread. Thus, OP 4.12 will be triggered in those cases. Therefore, a Resettlement Policy Framework (RPF) has been prepared by the government and approved by the Bank in compliance with OP 4.12. The RPF sets the guidelines for the Resettlement and Compensation Plans (RAPs) that would have to be prepared when any project investment triggers this policy. The RAPs would have to be submitted to the respective State Environmental Ministries /States Environmental Protection Agencies (SEPAs) and to the FMEnv for approval; and would also have to be approved by the Bank as a condition for that particular investment.

This policy would be triggered when the planned activities of the SA's cause involuntary taking of land and other assets resulting in: (a) relocation or loss of shelter, (b) loss of assets or access to assets (c) loss of income sources or means of livelihood, whether or not the affected persons must physically move to another location.

The World Bank Safeguard policy OP 4.12, in most cases, is not triggered because people are being affected by physical displacement. It is triggered because the project activity causes land acquisition, whereby a physical piece of land is needed and people may be affected because they are cultivating on that land, they may have buildings on the land, they may be using the land for water and grazing of animals or they may otherwise access the land economically, spiritually or any other way which may not be possible during and after the project is implemented. According to OP 4.12, people are in most cases compensated for their loss (of land, property or access) either in kind or in cash of which the latter is preferred.

The resettlement policy applies to all affected and displaced persons regardless of the total number affected, severity of impact and whether or not they have legal title to land.

4.3 Natural Habitats (OP 4.04)

The conservation of natural habitats, like other measures that protect and enhance the environment, is essential for long-term sustainable development. The Bank does not support projects involving the significant conversion of natural habitats unless there are no feasible alternatives for the project and its siting, and comprehensive analysis demonstrates that overall benefits from the project substantially outweigh the environmental costs. If the environmental assessment indicates that a project would significantly convert or degrade natural habitats, the project includes mitigation measures acceptable to the Bank. Such mitigation measures include, as appropriate, minimizing habitat loss (e.g. strategic habitat

retention and post-development restoration) and establishing and maintaining an ecologically similar protected area. The Bank accepts other forms of mitigation measures only when they are technically justified. Should the sub-project-specific ESMPs indicate that natural habitats might be affected negatively by the proposed sub-project activities with suitable mitigation measures, such sub-projects will not be funded under the CSDP AF.

4.4 Forests OP/BP 4.36

This policy applies to the following types of Bank-financed investment projects: (a) projects that have or may have impacts on the health and quality of forests; (b) projects that affect the rights and welfare of people and their level of dependence upon or interaction with forests; and (c) projects that aim to bring about changes in the management, protection, or utilization of natural forests or plantations, whether they are publicly, privately, or communally owned. The Bank does not finance projects that, in its opinion, would involve significant conversion or degradation of critical forest areas or related critical habitats. If a project involves the significant conversion or degradation of natural forests or related natural habitats that the Bank determines are not critical, and the Bank determines that there are no feasible alternatives to the project and its siting, and comprehensive analysis demonstrates that overall benefits from the project substantially outweigh the environmental costs, the Bank may finance the project provided that it incorporates appropriate mitigation measures. Sub-projects that are likely to have negative impacts on forests will not be funded under CSDP AF project.

5.0 POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

5.1 General

In Nigeria, environmental issues were of concern to the Government in the late 1980s. The Federal Military Government of Nigeria created Federal Environmental Protection Agency (FEPA) by Decree No 58 of 1988, and then formalised its functions by Decree No 59 in 1992. The two documents became known as the FEPA Act. The Agency was created as an integral part of the Presidency with responsibility for the “protection and development of the environment and biodiversity conservation and sustainable development of Nigeria’s natural resources”. It became the Agency’s duty to establish such environmental criteria, guidelines, specifications and standards for the protection of the nation’s air and inter-state waters as may be necessary to protect the health and welfare of the population from environmental degradation. The FEPA Act encouraged States and Local Government Councils to set up their own Environmental Protection Bodies for the purposes of maintaining good environmental quality in their respective areas.

In 1999, the Federal Government of Nigeria created a Federal Ministry of Environment (FMEnv), and all functions of FEPA were subsumed in this new ministry. At this time, it also incorporated nine departments from other Ministries, transferring to it all environmentally related functions and responsibilities hitherto performed by various sectoral ministries and agencies, in order to efficiently coordinate all environmental protection and natural resource conservation in the country. This included the former Federal Environmental Protection Agency (FEPA); departments of Forestry of the Ministry of Agriculture; the Environmental Health and Sanitation Unit of the Ministry of Health; the Oil and Gas Pollution Unit of the Department of Petroleum Resources; the Coastal Erosion Unit, The Environmental Assessment Division and the Sanitation Unit of the Ministry of Works and Housing and Soil Erosion and Flood Control Department of the Ministry of Water Resources.

As the coordinating institution for all environmentally-related functions, The FMEnv is expected to play a catalytic role in: (a) defining the broad environmental policy framework; (b) providing selected service functions (such as environmental data collection and analysis, education and public awareness, etc.) to other sectors, (c) collaborating with sectoral ministries and stakeholders to develop and improve the environmental legal and regulatory framework; (d) managing ecosystems and promoting sustainable use of natural resources; and (e) enforcing environmental norms, standards and rules. While the structure of the FMEnv continues to evolve towards defining a broad environmental policy framework it has produced documents such as the “National Policy on the Environment” and “Nigeria’s National Agenda 21”, both of which recognise that sustainable livelihoods require the pursuit of policies and strategies that simultaneously address issues of development, sustainable resource management and poverty alleviation.

5.2 National Regulations

5.2.1 Federal Government of Nigeria (FGN)

There are several environmental regulations in Nigeria, prominent among them is the EIA decree No. 86 of 1992. This Decree gives specific powers to the Federal Ministry of Environment (FMEnv) to facilitate environmental impact assessments (EIAs) on all new projects in Nigeria and to make an EIA mandatory for new major public or private sector projects, i.e. any proposed physical work or activity that is likely to significantly affect the environment. In effect, the decree deals with all EIA-related issues including: (a) timing and processing of EIA; (b) content of an EIA report including the factors to be considered in the EIA; (c) public involvement in the EIA process and public information disclosure; (d) trans-boundary impact of projects, whether state or international; (e) definition and requirement of environmental management plans for polluting development projects; (f) review of EIA and conflict

resolution mechanisms; (g) powers of the Federal Environmental Protection Agency to further regulate the EIA process; and, (h) lists of activities subject to mandatory EIA.

The FMEnv, has put in place statutory documents to aid the monitoring, control and abatement of industrial waste including the indiscriminate pollution of the environment.

The statutory documents currently in place include:

- FEPA Guidelines and Standards for Environmental Pollution Control in Nigeria, 1991;
- The FEPA Harmful Wastes (Criminal Provisions) Decree No. 42, 1988;
- The FEPA National Policy on the Environment, 1989;
- FEPA National Effluent Limitation Regulations, 1991;
- FEPA Pollution Abatement in Industries and Facilities Generating Waste Regulations; 1991.
- Solid and Hazardous Wastes Management Regulations of 1991;
- National Guidelines and Standards of Waste Management in the Oil Industry;
- National Guidelines on Environmental Management Systems (EMS);
- National Guidelines on Environmental Auditing (EAu);
- Environmental sanitation guidelines;

In addition, Nigeria is a signatory to the following relevant international conventions:

- The African Convention on the Conservation of Nature and Natural Resources, The African Convention, 1968;
- The Convention Concerning the Protection of the World Cultural and Natural Heritage, The World Heritage Convention, 1972;
- The Convention on International Trade in Endangered Species of Wild Fauna and Flora, CITES, 1973;
- Convention on Conservation of Migratory Species of Wild Animals, Bonn, 1979.
- The Basel Convention on the Control of Transboundary Movement of Hazardous Waste and Disposal, 1989;
- The Framework Convention on Climate Change, Kyoto Protocol, 1995;
- The Convention on Biological Diversity, 1992;
- The Convention on the Prevention of Marine Pollution by Dumping of Waste, MARPOL, 1972.
- United Nations Convention to Combat Desertification, UNCCD 1994

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

5.2.2 National Policy on the Environment

The stated goal of the National Policy on the Environment is to achieve sustainable development in Nigeria, and in particular to:

- Secure a quality of environment adequate for good health and well-being;
- Conserve and use the environment and natural resources for the benefit of present and future generations;
- Restore, maintain and enhance the ecosystems and ecological processes essential for the functioning of the biosphere to preserve biological diversity and the principle of optimum sustainable yield in the use of living natural resources and ecosystems;

- Raise public awareness and promote understanding of the essential linkages between the environment, resources and development, and encourage individual and community participation in environmental improvement efforts; and
- Co-operate in good faith with other countries, international organisations and agencies to achieve optimal use of trans-boundary natural resources and effective prevention or abatement of trans-boundary environmental degradation.

This policy identified key sectors requiring integration of environmental concerns and sustainability with development. It presented specific guidelines for achieving sustainable development in the following fourteen sectors of Nigeria's economy: Human Population; Land Use and Soil Conservation; Water Resources Management; **Forestry, Wildlife and Protected Natural Areas**; Marine and Coastal Area Resources; Sanitation and Waste Management; Toxic and Hazardous Substances; Mining and Mineral Resources; Agricultural Chemicals; Energy Production; Air Pollution; Noise in the Working Environment; Settlements; Recreational Space, Green Belts, Monuments, and Cultural Property

5.2.3 Land Use Act

The legal basis for land acquisition and resettlement in Nigeria is the Land Use Act 1978 and modified in 1990. The following are selected relevant sections:

Section 1. Subject to the provision of this Act, all land comprised in the territory of each state in the Federation are hereby vested in the Governor of each state and such land shall be held in trust and administered for the use and common benefit of all Nigerians in accordance with the provisions of this Act.

Section 2. (a) All land in urban areas shall be under the control and management of the Governor of each State; and (d) all other land shall be under the control and management of the local government within the area of jurisdiction in which the land is situated.

Therefore, according to the Land Use Act, all land in Nigeria is vested in the Governor of each State, and shall be held in trust for the use and common benefit of all people. The administration of land area is divided into urban land which will be directly under the control and management of the Governor of each State; and non-urban land, which will be under the control and management of the Local Government. The Governor of each State will have the right to grant statutory rights of occupancy to any person or any purpose; and the Local Government will have the right to grant customary rights of occupancy to any person or organization for agricultural, residential and other purposes.

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

5.2.4 State Environmental Protection Agencies

Decree No. 58 of 1988, as amended by Decree No. 59 of 1992, which established FEPA, also issued a federal directive to the states to establish State Environmental Protection Authorities (or Agencies)¹. The proposed participating States have a functioning (to varying degrees) Environmental Protection Agency or Authority established under state edicts. The functions of these agencies/authorities is to exercise general responsibility for the protection and development of the environment in their State and in consultation with the Federal Ministry of Environment (FMEnv), ensure implementation and enforcement of FMEnv's regulations in the State and in particular shall:

- Ensure the carrying out of annual State of the Environment Report.
- Enforce State regulations control criteria, procedures, guideline and environmental standards for effective prevention, remediation, control and prevention of point and non-point sources of pollution and degradation.
- **Formulate, implement, and review environmental policy in the State and in particular to demand and review EIA and EIS for new development projects and also to demand and review environmental audit reports for existing developments and such other operations which are deemed to have significant impact on the environment.**
- Prepare in accordance with state policy and Edict on the environment periodic master plans for the development and the financial requirements for implementation of such plans.
- Prevent, stop any act of omission or commission which consequences are likely to adversely affect the environment and to generally deal with any discharge solid, liquid or gaseous, deposited willfully or otherwise in the environment and to deal generally with any violation which the authority may deem hazardous to the environment and the ecosystem.
- Monitor the entire state of parts of the state for any such discharge.
- Cause the responsible parties to stop or remove such discharge.
- **Monitor environmental quality, conduct programmes of continuing, surveillance and of regular periodic inspection of actual or potential contaminants of point and non-point of sources of the environment in accordance with the laid down regulations as the authority may deem fit.**

To liaise with federal, state, local governments and other public and private authorities, agencies, and institutions engaged in environmental planning and functions.

The State Ministry of Environment in the states, set policy guidelines for the State Environment Protection Agencies (SEPA) and State Ministry of Environment (in some states, SEPA has been subsumed into the states' Ministry of Environment) to implement, enforce or monitor implementation of state environmental policies.

5.2.5 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 2ft in girth or to set fire to the forest except under special circumstances. Nigeria is at present a wood deficit nation. In order 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 through the use of 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 utilisation of timber, its derivatives and the reduction of wastes; and

- Wildlife conservation, management and development through the creation and effective management of national parks, game reserves, tourist and recreational facilities, etc.

6.0 POTENTIAL IMPACTS

The implementation of CSDP AF project must be designed to be environmentally sustainable and socially inclusive so as to avoid any undesirable adverse consequences of the given interventions and hence ensure the achievement of improved standards of living of the less privileged, the poor, widows, orphans and disabled. Most of the project impacts would be site-specific and localized due to being relatively of small scale. Nevertheless, there are some issues of concern that cut across the range of proposed interventions.

Lessons learned on the project so far has shown that issues such as community involvement, community ownership and selection of appropriate sites are some of the key concerns that influence project success, sustainability and impact to environment.

Discussed below are both the potential *positive* and *negative* impacts of CSDP AF micro-projects.

6.1 Overall Environmental and Social impacts

Environmental and social sustainability are fundamental to overall sustainable development strategies, natural resource conservation, and poverty alleviation. Lessons learned from various World Bank CDD projects in Nigeria including CSDP demonstrate that community involvement in the decision-making and management process may bring effective and lasting improvement in the livelihoods of people, and can lead to better use and protection of the natural resource base. Therefore environmental and social sustainability are fundamental to the success of CSDP AF project. However, recent environmental audit of the project has shown various impacts of the project.

6.2 Potential Positive Impacts

- The CSDP project has strengthen traditional systems of environmental and social governance and embrace the notion of community dialogue through effective functioning of community based committees for community land, environmental and social management;
- CSDP project promotes the decentralization process through support to capacity building interventions at the local government levels;
- Maintenance and rehabilitation of rural roads have increase access to markets and social services, such as health care and education;
- An increased number of strategically located small-scale water points has helped to meet the need for potable water and led to a more diffused distribution of human and livestock pressures on existing limited resources;
- Effective management and reversal of degradation of natural habitans through a variety of known soil and water conservation techniques (rock bunds, composting, windbreaks, reforestation, etc.) has led to a positive impact on conservation of natural habitats and biodiversity in most areas especially in the extreme northern states of Gombe, Katsina and Zamfara;
- Increased income and employment opportunities thus reducing social disruptions;
- Social cohesion and empowerment for decision making;
- Local institutional strengthening and empowerment is achieved through improved understanding and use of the tools and mechanisms for environmental and social impact assessment and participatory approaches to community development (e.g. development of a community development plan);
- Investment in social and economic infrastructure, such as construction or rehabilitation of health facilities, school classrooms, markets, etc. have resulted in improvement in people's well-being and livelihoods, and promote equitable development;

- CSDP communities currently engaged in joint patrol and monitoring of Parks and Forest Reserve with the Park rangers as part of the community contribution to sustainability management of forest resources in Nigeria; and
- Direct positive impacts on vulnerable groups through direct involvements in project developments and implementation and the proposed component 4 would revolutionized the approaches to poverty reduction amongst the vulnerable groups.

Consequently, CSDP AF project activities have the potential and have proven to make a significant contribution to Nigeria's policies to protect and preserve the environment and reduce poverty in both urban and rural areas.

6.3 Potential Negative Impacts

- Opening of rural areas via feeder road construction create open access for forest exploitation;
- There are a significant number of NGO and development agencies financed projects throughout Nigeria, with considerable rural development experience, that may be undermined by the financial and political weight of CSDP project if they are not effectively included in the process;
- Rising population pressures, a deteriorating resources base, desertification and drought due to climate change and intensification of the agricultural production systems often lead to an increase in land-related conflicts. The introduction of investments in these areas may attract outside immigrants that will further increase pressure on existing resources and possibly increase land-related conflicts. In addition, there could be involuntary displacement in communities when direct labour is adopted for service delivery; and
- Individuals benefitting from component 4 (Vulnerable Groups livelihood investment grants/transfers component) may utilized improved livelihood condition to increase damage to natural resources and degrade the environment. This, in addition to the outcome of the 2013 nationwide environmental audit of the CSDP projects form the basic reasons why the Natural Habitats (OP 4.04, BP 4.04, GP 4.04) and Forests (OP 4.36, GP 4.36) were triggered by CSDP AF and the need to address them during project implementation.

However, both the Federal Government of Nigeria (FGN) and the World Bank have considered these risks carefully in the preparation and design of the CSDP AF, especially considering the experience gained on the project in the last three to four years.

Annex 2 presents many of the proposed activities that can be undertaken by CSDP AF project and predicts many of both positive and negative impacts including those of component 4. The sub-project list and potential impacts are not intended to be exhaustive since they are expected to be selected and developed using a CDD approach at LGA/Community levels.

6.4 Localized Negative Impacts

Micro-projects to be implemented under the CSDP AF funding will be small in scale: therefore the significance of the direct negative environmental and social impacts is likely to be small, localised and site-specific-typical of Category B projects.

6.5 Cumulative Impacts

Some sub-projects may in some areas result in cumulative impacts on the environment. Cumulative impacts are impacts, which may result from individually, small-scale sub projects with minimal impacts but which over time can combine to have a significant impact, in case CSDP AF supports so many sub projects in the same community.

Some examples of activities related to such sub projects are as follows:

- ❖ Potential impacts on groundwater, owing to the construction of numerous wells;
- ❖ Bush clearing (using slash and burn methods) of marginal forest or bush land with subsequent depletion of soil fertility;
- ❖ Deforestation due to the exploitation of forest resources for such uses as firewood, construction materials, etc.;
- ❖ Deforestation due to opening up of access to parks and forest reserve;
- ❖ Development of lowlands which may have both upstream and downstream impacts (e.g., increase in soil erosion, decrease in available water resources downstream resulting in less water flowing into international waterways);
- ❖ Resettlement, relocation, displacement or loss of access to assets due to the acquisition of land for construction of facilities, such as public amenities;
- ❖ Increased proximity and access to protected areas through construction of rural feeder and forest roads; and
- ❖ Attraction of large migrant populations to communities that have successfully improved social infrastructures (such as health centers, schools or water sources) resulting in pressures that lead to overcrowding, depletion or constraint of resources (e.g. water space, supplies etc.).

Cumulative impacts can also be defined as impacts, which potentially develop from the combined impacts of more than one project or large scale program occurring within the same area of influence and time span. In such cases, cumulative impacts will have to be assessed based on the combined effects of potential impacts from the various program inputs. Considering possible cumulative impacts of the CSDP AF funded sub-projects, stakeholders will be provided with an opportunity to learn how to avoid or mitigate localized impacts from initial sub-projects, so that measures can be integrated into subsequent activities. A list of triggers, which can be used to determine whether the programs may result in cumulative impacts, and if so, what tools are required for mitigation are also discussed in this framework. Already environmental checklist for most common sub-projects has been developed.

6.6 Strategic Impacts

The location of certain small-scale sub projects such as feeder roads, market stalls and special programs such as orphan centres and disabled skill acquisition centres for vulnerable groups might also have strategic impacts. Thus, they require a more detailed assessment in relation to the types of sector policies and land management plans that the Government of Nigeria is advocating (e.g. how many feeder roads may fit into the overall transport sector policy in Nigeria). Infrastructure such as feeder roads requires an assessment of the location and design to take into account the potential impacts that the road may have on the natural resources (soil erosion, encroachment on protected areas, changes to surface run-off, dust, etc.) and on the social environment (mobility of communities, migration of people, introduction of diseases, etc.). While social infrastructure for the vulnerable groups such as orphan learning centres and skill acquisition centres for the disabled would require in depth needs assessment of the location and design on how the potential impacts of such projects would have positive effect on their social environment (acceptance into the community) and economic empowerment (ability to generate income for themselves).

6.7 Other Social and Environmental Degradation Issues

Other issues, which need to be addressed under CSDP AF are the issues of pollution, land degradation, medical and domestic waste disposal, pest management and sensitivity to vulnerable groups.

These are discussed below:

(i) Potential Sources of Pollution

With respect to CSDP AF funded micro-projects, there is a possibility that development of social and economic infrastructure can lead to pollution of watercourses from increased generation of solid waste and wastewater due to inadequate attention being paid to inclusion of proper sanitation facilities or initiations measures.

(ii) Impact on Ecological Resources and Land Degradation

Some of the proposed activities and sub-projects can lead to both localized and cumulative impacts on such areas as bio-diversity, lowlands, forests, soil and water quality, etc. Land degradation due to sub-projects that involve construction, deforestation, and induced impacts associated with small-scale feeder roads, or any development that induces concentration of people, agriculture or livestock in particular areas. The environmental and social screening tools presented in this framework will be used to identify and mitigate the potential impacts discussed as they related to certain types of community investments.

(iii) Medical Waste Disposal

Micro-projects such as maternity center or dispensaries/health centers could generate small amounts of waste associated with pharmaceuticals, drugs or medical waste of any kind and this carries disposal risks.

Indiscriminate disposal carries risks for human and animal health, pollution of watercourse, and land or water resource contamination in localized areas.

Waste categorized as infectious or bio-hazardous is capable of spreading infectious disease, and has become a very significant issue especially for HIV/AIDS contaminated materials. It is especially important to develop and apply effective animal and human medical waste handling disposal methods, with the support of the appropriate and line ministries (especially Ministries of: Health, Water Resources; Agriculture and Rural Development, Industries and Trade, and Tourism etc.); and respective agencies, such as the National Food and Drug Enforcement Agency (NAFDAC).

Guidelines of the national Health Care Waste Management Policy (HCWMP), approved in September 2013, will be followed to address medical waste management and disposal issues arising from these activities. A Medical Waste Management Plan for the project will be prepared, consulted upon, and disclosed.

Issues to be addressed in a Medical Waste Management Plan

- ⇒ Laboratory wastes—specimen or microbiologic cultures, stocks of infectious agents, live and attenuated vaccines and culture mediums;
- ⇒ Blood or body fluids-liquid blood elements or other regulated body fluids, or articles contaminated with blood or body fluids;
- ⇒ Sharps-items such as syringes, needles, blades, broken glass;
- ⇒ Contaminated animals- animal parts or tissues removed surgically or by autopsy; and
- ⇒ Isolation waste – waste contaminated with excretion, exudates, or secretions from humans or animals who are isolated due to the highly communicable diseases such as: Hemorrhagic fever, Tickborne encephalitis virus complex (Absettarov, Hanzalo, Hypr, Lassa fever virus, Kyasanur Forest disease, Marburg disease, Ebola and others.

6.8 Impacts on vulnerable groups (Component 4)

Small-scale social infrastructure micro-projects such as specialized skills centers, classrooms, health centers, specialized tools and equipment, one time start-up grants into drug revolving funds, scholarship funds or other welfare funds for vulnerable groups will bring benefits to vulnerable groups and the poor, and would thus reduce existing inequalities. Thus, when planning micro-projects, it is crucial for communities and or individual to receive support in community participation, project planning and management from skilled facilitators and specialists, in order to address issues of reaching the poor and vulnerable groups.

Poor and vulnerable groups fall into three categories: those who are able to work but have low incomes arising from low productivity; those who are unable to work (elderly/retiree, the handicapped), and those who are forced into temporary poverty by drought, recession, structural adjustment, or political transition (orphans, women).

Most community development plans (CDP) are targeted towards the first category because that group could be helped by growth enhancing programs that foster labour absorption and raise productivity and the other two categories are not catered for due to the lack of adequate programs to reduce their burdens. The CSDP AF intends to utilize the experience gained from the safety net under current CSDP to reach all categories of vulnerable people at both individual and group levels to enhance their productivity and reduce poverty amongst the group. Component 4 have been specifically designed and targeted at reducing poverty amongst the vulnerable groups.

Guidelines for operating component 4 interventions of CSDP AF using safety nets approach include:

- Avoid open, general subsidies, which are unsustainable, distortionary and mainly benefit the non-poor;
- Limit program costs to a small percentage of the total budget, ensuring sustainability;
- Use innovative designs and delivery mechanisms (like community based Non-Governmental Organizations) to reach groups that standard safety nets often miss (poor women, indigenous groups);
- Keep transaction costs low to avoid eroding the real costs of the benefits;
- Ensure that safety nets are broad enough to maintain political support- very fine targeting can undermine such support;
- Avoid excessive fine tuning in targeting since it may end up excluding the poor and non –poor; and
- Keep assistance modest to minimize changes in incentives and behavior, which can erode real benefits.

7 INSTITUTIONAL ASSESSMENTS AND FRAMEWORK FOR ENVIRONMENTAL AND SOCIAL MANAGEMENT

7.1 Institutional Roles and Responsibilities

The main institutions with key responsibilities in this ESMF are as follows.

7.1.1 The Federal Ministry of Environment (FMEnv)

One of the primary responsibilities of the Federal Ministry of Environment (FMEnv) is to ensure that all major development projects in Nigeria are subject to mandatory Environmental Impact Assessment (ESIA) pursuant to EIA Act. No. 86 (Decree No. 86) of 1992. The FMEnv reviews and approves EA documents for category A projects; especially the complex and more risky ones. For the CSDP the respective State Environmental Protection Agency (SEPA) or the State Ministry of Environment as the case may be will handle the reviews and approvals.

The role FMEnv will play in this project is one of monitoring, to ensure (i) that the SEPA's are reviewing the EA documents and clearing them according to Federal Guidelines, State Laws and World Bank Safeguards policies, (ii) that the SEPA's are monitoring the activities of the SAs during construction and post-construction (i.e. operations stage) at all locations in the state on which the SAs have sub-projects investments.

7.1.2 The State Agency (SA)

The State Agency (SA) will be responsible; (i) for complying with all Federal, State and Local Laws regarding the environment and with all social/poverty guidelines, parameters and targets set by the project, and of all triggered World Bank Safeguards policies, (ii) ensuring that communities prepare an EMP report for their planned investments under this project and to submit the EMP to the SEPA's or State Ministry of Environment for clearance, (iii) to implement all appropriate mitigation measures identified in the EMP into the project planning cycle, technical and engineering designs and drawings, and contracts, (iv) to ensure that these mitigation measures are complied with during construction and post construction (i.e. operations) stages of their activities, by self-monitoring of their activities and by periodically reporting to the SEPA's, State MEnv and the FMEnv, and (v) to comply with any directives that may be issued from time to time from the SEPA's, State MEnv and FMEnv.

7.1.3 The State Environment Protection Agencies (SEPA's) and State Ministry of Environment (State MEnv)

The State Environmental Protection Agencies (SEPA's) are responsible; (i) to ensure the activities planned under this project by the SA's comply with their state's environmental laws and requirements, and that of the Federal Government and the World Bank's triggered Safeguards Policies, (ii) for receiving, review, commenting, requiring revisions where necessary and clearing and approving the EA document details of the SA's, and (iii) to perform regular and intrusive monitoring regime of the construction, operations and maintenance stages of the activities of the SA's, (iv) for preparing periodic monitoring reports on the activities of the SA's at all stages of operations and to send these reports on a regular basis to the FMEnv. (v) to comply with (consistent with state laws) the directives of the FMEnv, (vi) to issue directives to the SA's consistent with state laws on environmental requirements.

7.1.4 LGDOs, CPMC and LGRC

The Local Government Desk Officers (LGDOs) of the CSDP project would comprise three persons: Community Development Officer, Officer with financial background and Environmentalist/Natural

Resource Management Specialist. The LGDOs will be based in local government areas so that they can visit communities within the local government councils on a regular basis to facilitate the intensive participatory process to evolve Community Development Plans (CDPs). The LGDOs and the SA's Operating Officers (OOs) will help communities conduct limited environmental assessments and will also be responsible for completing the checklists of possible environmental impacts that may result from the micro-projects that comprise the Community Development Plan (CDP).

7.1.5 The World Bank

The World Bank has overall responsibility to ensure that its Safeguards Policies are complied with. In addition, the Bank will be responsible for the final review and clearance of ESMPs, RAPs, and the Medical Waste Management Plan (MWMP). The Bank will also review and give "no objection" to ESMP, RAP, and MWMP TORs. The responsibility for preparing the TORs for ESIA/ESMPs, RAPs, and the MWMP resides with the State Agencies. ESIA/ESMPs, RAPs, and/or the MWMP will be consulted upon and disclosed in-country and at the World Bank InfoShop.

7.2 Capacity Assessment to Perform Attributed Institutional Roles.

7.2.1 Federal Ministry of Environment (FMEnv)

The role of the FMEnv in this project will be that of monitoring. Although the staffing levels at the EIA division of the FMEnv and the Impact Mitigation and Monitoring (IMM) Branch of the EIA division are sufficient with adequate experience to carry out these roles, there is a need for further training.

7.2.2 State Agency (SA)

All technical assistance, institutional building, and investment sub-projects will be managed and supervised by the SA. The SA will be headed by a General Manager who will manage an interdisciplinary staff that will also include an environmental specialist or natural resource management officer. To successfully implement this ESMF, it is recommended that the SA designate a staff for environmental and social management.

The designated environment/social specialist will be responsible for day to day monitoring and reporting feedback throughout the life of the project, specifically the monitoring of (i) the environment and social assessment work to be carried out by the specialist him/herself or by the service providers; (ii) overseeing the implementation of the ESMPs and RAPs (if applicable); and (iii) monitoring of environmental issues during operations.

7.2.3 State Environment Protection Agencies (SEPAs).

The SEPAs will perform the following key roles in this project:

- Reviews terms of reference (TOR) for ESMPs
- Ensure adherence to ESMP requirements
- Ensure implementation of ESMPs in communities
- Review and comment SA's ESMP
- Monitor compliance of ESMPs for micro-projects
- Enforce state laws.
- Report to the FMEnv

Figure 7.1: Community Development Plan (CDP) Cycle

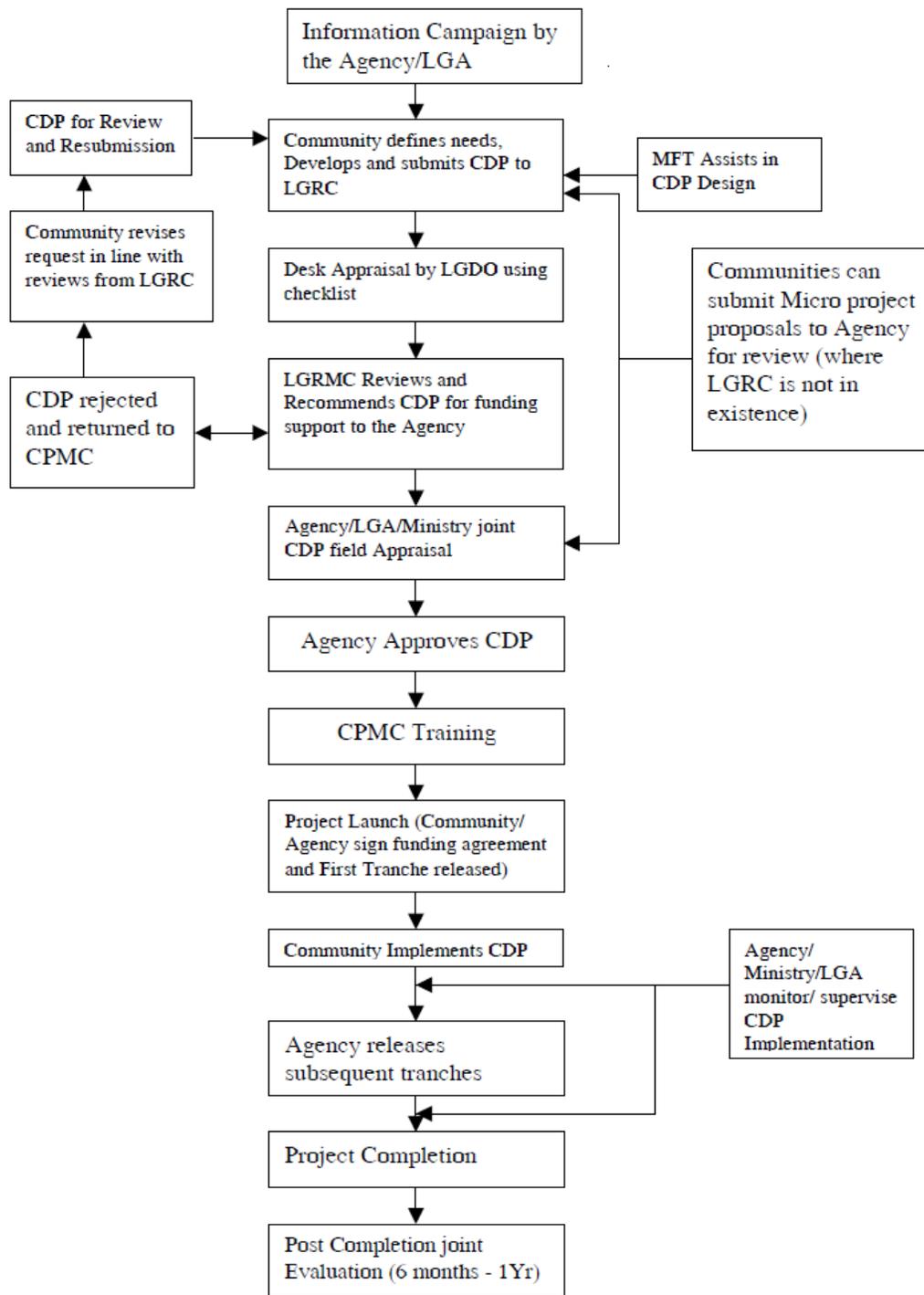


Table 7.1: Summary Table of Institutional Framework for Environmental and Social Management Plan (ESMP)

<i>Institution</i>	<i>Tasks/Activities</i>
Federal Project Support Unit (FPSU)	Project Coordination and Oversight; reporting to IDA
State Agency (CSDP AF)	Preparation of TORs for ESMPs; monitoring activities of ESMPs.
Federal Ministry of Environment (FMEnv)	Monitoring State Environment Ministries/Agencies and reporting to FPSU
State Environment Ministries/Agencies	Review, approve and clearance of ESMPs; Monitoring SA and reporting to FMEnv. and State Project Advisory Board
State Agency	Ensuring the Preparation ESMPs; Self-monitoring and reporting to SEPA /State Environmental Ministry and FPSU.

8 ENVIRONMENTAL AND SOCIAL PLANNING, REVIEW AND CLEARING PROCESS AND PROCEDURES FOR SUB-PROJECTS

As already stated in the earlier chapters, the specific locations of sub-projects were not yet identified at the time of preparing the project documents. Consequently, specific information on numbers of sub-projects, site locations, land requirements, local communities, geo-physical land features, nature, type and use of equipment/plant etc. was not available. Therefore, exact details and intensity of social and environmental impacts and their effective mitigation cannot be determined during project preparation.

This document referred to as the Environment and Social Management Framework (ESMF) is thus prepared to establish mechanism to determine and assess future potential adverse environmental and social impacts of sub-projects that are to be identified and cleared based on a community demand driven process, and then to set out mitigation, monitoring and institutional measures to be taken during implementation and operation of the sub-projects to eliminate adverse environmental and social impacts, offset them or reduce them to acceptable levels.

This chapter therefore, identifies and illustrates the specific steps involved in environmental and social assessment process leading towards the clearance and approval of the EA process for sub-projects. The steps incorporate both relevant Nigerian guidelines/requirements and the Bank's policy OP 4.01 on Environmental Assessment. Also, screening and mitigation requirements to ensure compliance with OP 4.04 on Natural Habitats and OP 4.36 on Forests have been included in the Environmental and Social Screening Form (ESSF), Environmental Checklist Forms for Sub-projects, Environmental Review (ER) Form, and **Limited Environmental Assessment (LEA) Form**.

8.1 Environmental Screening Process

The purpose of the screening process is to determine whether sub projects are likely to have potential negative environmental and social impacts; to determine appropriate mitigation measures for activities with adverse impacts; to incorporate mitigation measures into the sub project design; to review and approve sub project proposals and to monitor environmental parameters during implementation. The extent of environmental and social work that might be required for the sub project prior to implementation will depend on the outcome of the screening process.

Environmental Screening will be done using information provided on Environmental and Social Screening Form (Annex 3A). Local Government Desk Officers (LGDOs) and the Community Project Management Committee (CPMC) will guide and facilitate the communities to fill and complete this form during sub project identification process.

A checklist (Annex 4B) is provided to guide the CPMC/LGDO/ OOs teams identify appropriate mitigation measures for the sub project identified.

For situations where the environmental and social screening process identifies land acquisition needs, that would trigger OP 4.12 Involuntary Resettlement, then the provisions of the Resettlement Policy Framework (RPF) would apply. This would require the LGDO/CPMC/OOs teams to advise communities to choose an alternative land site that does not trigger this policy. Any sub projects that land acquisition will not be resolved at the community level will be ineligible for funding. Also, where Forests and Natural Habitats are identified to be impacted by environmental and social screening, a detailed EIA/ESMP following the provision in annex 4 will be required. Should the sub-project EIA indicate that forests and or natural habitats might be affected negatively by the proposed sub-project activities, such sub-project will not be funded by CSDP AF. However, if the EIA indicate that the impacts are not critical,

that there are no feasible alternatives to the project and its siting, and comprehensive analysis demonstrates that overall benefits from the project substantially outweigh the environmental costs, the Bank may finance the project provided that it incorporates appropriate mitigation measures based on the peculiarity and location of the proposed sub-project.

8.2 Categorization of CSDP AF subprojects for EA

As a general rule all projects regardless of their size are supposed to be screened. Screening provides information which is the basis for classification of projects into categories A, B, or C depending on the nature, type, scale, location, sensitivity and magnitude of the potential /envisaged environmental impact of the project or sub-project.

The groups are as follows:

- ⇒ **Category A project** is the one that is likely to have significant adverse environmental impacts that is sensitive, diverse or unprecedented. Such a project falls under the Mandatory List, which means they must be subjected to a full EIA.
- ⇒ **Category B project** is the one whose potential adverse environmental impacts are less adverse than those of Category A, and are few, site specific and in most cases have mitigation measures can be designed readily. Category B projects/subprojects require Limited Environmental Impact Assessment (LEA)
- ⇒ **Category C project** is that one that is likely to have minimal or no adverse environmental impacts. Apart from registration and screening no further EA action is required.

In light of the above categorization, and given the fact that the prime objective of CSDP AF is to finance community-based micro projects and assist the vulnerable population, then CSDP AF funded sub projects fall under category B according to World Bank Operational Manual and Category 2 of the Nigerian EIA Procedures and Guidelines.

8.3 Assigning appropriate environmental category

The screening process will lead to four safeguard requirements:

- No further action if the sub project has no impacts on the social aspects and environment.
- Carry out simple Environmental Review if sub project may create a few minor and easily mitigated environmental and/or social problems.
- Carry out Limited Environmental Review if sub project may create minor environmental problems that require frequent site visit or construction modifications to minimize or eliminate impact.
- Carry out full EIA if sub project will result into potentially significant direct or indirect adverse impact.

8.4 Conduct ER, LEA or EIA

After reviewing the filled Environmental Social Screening Form (ESSF) and the sub project environmental checklist, the LGDO/CPMC teams will determine the extent of the environmental and social work required, i.e. whether the application of mitigation measures outlined in the environmental checklist will suffice or not. Some design modifications can be incorporated at this stage in order to minimize or avoid environmental impacts.

Depending on the magnitude of the environmental impact identified, then the designated local government environmental Officer will carry Environmental Review or Limited Environmental Assessment. Forms for carrying out ER and LEA are attached as Annex 4C and 4D.

In some cases, the results of the environmental and social screening process may indicate the need to carry out a full EIA. In this case, the more complex environmental procedures shall be followed. Such full-fledged EIA requires inputs from teams of specialists/consultants as well as from other stakeholders. The steps for carrying out an environmental impact assessment are outlined in Annex 5.

8.5 Review and Approval

Under the guidance of the LGA Environmental specialist, the LGRC team will review the Environmental and Social Screening Form as well as the Environmental Checklists that were completed in the course of sub-project preparation to ensure that all environmental and social impacts have been identified and successfully mitigated. The LGRC must also ensure that the sub-project designs include monitoring and institutional measures to be taken during implementation and operation.

If the application has satisfactorily addressed these issues, the LGRC will then clear the sub-project and recommends for approval and subsequent funding.

If the LGRC finds that the submitted design is not consistent with the requirements of the environmental screening form and the environmental checklist, then the sub-project implementer would be requested to re-design (e.g. make additional modifications and /or choose other sites) and re-screen the project until it is consistent and then re-submit it for review.

Any proposed sub-projects that do not comply with the requirements of Nigeria and the World Bank safeguards policies will not be cleared for approval.

8.6 Environmental and Social Management Plan (ESMP):

Sub-project proposals must contain as part of the documentation an ESMP that will consist of a set of mitigation measures, monitoring and institutional measures to be taken during the implementation and operation of the sub-projects to eliminate adverse environmental and social impacts, offset them or reduce them to acceptable levels. The ESMP should also include the actions needed to implement these measures, including the following features:

- **Mitigation:** Based on the environmental and social impacts identified from the use of the checklists, the ESMP should describe with technical details each mitigation measure, together with designs, equipment descriptions and operating procedures as appropriate.
- **Monitoring:** Environmental and social monitoring during the implementation of the sub-projects, in order to measure the success of the mitigation measures. The ESMP should include monitoring objectives that specify the type of monitoring activities that will be linked to the mitigation measures. Specifically, the monitoring section of the ESMP provides:
 - (i) A specific description and technical details of monitoring measures that include the parameters to be measured, the methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions, e.g. the need for on-site construction supervision.
 - (ii) Monitoring and reporting procedures to ensure early detection of conditions that necessitate particular mitigation measures and to furnish information on the progress and

results of mitigation, e.g. by annual audits and surveys to monitor overall effectiveness of this ESMF

The ESMP should also provide a specific description of institutional arrangements, i.e. who is responsible for carrying out the mitigating and monitoring measures (for operation, supervision, enforcement, monitoring of implementation, remedial action, financing, reporting and staff training).

Based on information presented in this ESMF, a sample ESMP has been prepared and this is documented in Annex 5. This summary ESMP captures those general activities that are proposed for implementation under CSDP AF. It should be noted that an ESMP must be developed for each sub-project including those of component 4. As a rule, each sub-project should not be considered or approved for funding without documenting an implementable and fundable ESMP.

Additionally, the ESMP should include an estimate of the costs of the measures and activities recommended so that the SA can budget the necessary funds. The mitigation and monitoring measures recommended in the ESMP should be developed in consultation with all affected groups to incorporate their concerns and views in the design of the ESMP.

8.6.1 Review and Approval of ESMPs

The ESMPs for sub-projects are part and parcel of the Environmental Reports i.e. ER, LEA or the EIA reports as the case may be. In summary the review and approval process will follow any of the three procedures:

- The operations unit and the respective SA General Manager will prepare the ER report. It will be reviewed and approved by the respective State Environmental Protection Agency or Authority.
- The LEA report will be prepared by a consultant commissioned by LGRC and will be submitted to the SA and SEPA for review and approval.
- For those few projects which requires a full EIA then it will trigger an EIA process which involves hiring an EIA consultant to undertake the EIA study as stipulated in the *National EIA Procedure and Guidelines* and World Bank's OP 4.01

8.7 Component 4 Project Criteria

Proposed Criteria for Choosing a Program- A minimum set of criteria on which to assess the relative merits of component 4 programs is the following:

- **Administrative feasibility:** A program must pass some minimum level of administrative feasibility before it can be viable. After that, there are degrees of administrative feasibility depending on the level of imperfections that can be tolerated and the extra resources that are available to bolster administrative capacity. The issue of administrative feasibility affects both the choice between different kinds of programs and the detailed design of the program selected.
- **Political feasibility:** Political feasibility: A program must also possess a minimum level of political feasibility if it is to be viable. After that there are degrees of feasibility depending on program design and country context issues such as the relative power of beneficiaries, suppliers and administrators, how the program is promoted to the public and how coalitions of supporters or detractors are built.
- **Collateral effects on elements Collateral Effects.** In the implementation of component 4 program, consideration should be given to the program's possible collateral effects such as changes in the

participants' labor supply, participation in other programs, or receipt of private inter-household transfers, and the effects of these changes on markets and government finances. These may be positive, negative, or neutral with respect to the overall poverty reduction strategy

- Targeting: Poverty programs are obviously meant to reach the poor. Leakage of benefits to the non-poor and or non-vulnerable reduces the effectiveness of the program because funds are used on those who are not in need. Furthermore, the program must be able to reach significant numbers of the vulnerable people to avoid the problem of under coverage. If it is incapable of doing so, the program will be ineffective.
- Tailoring the Solution to the Problem. The program choice should reflect the problems faced in the particular country and time. For example, where the poor have suffered a loss of real wages rather than a loss of jobs, transfers to the working poor may be more relevant than job creation. While this criterion seems almost too obvious to include, initial proposals of what to do about poverty programs seem to ignore it often enough.

In Annex 6 is a Summary of the Program Assessment Matrix

8.8 Public Consultations

Public consultations are critical in preparing an effective and sustainable sub-project. The first step is to hold public consultations with the local communities and all other interested/affected parties. These consultations should identify key issues and determine how the concerns of all parties will be addressed in the terms of reference of the design of sub-projects activities.

The consultations should also include vulnerable groups within the community, specifically the poorest of the poor, elderly, widows and widowers, and women. To facilitate meaningful consultations, the local governments and the Community Project Management Committee (CPMC) will provide all relevant material and information concerning the sub-projects in a timely manner prior to the consultation, in a form and language that are understandable and accessible to the groups consulted.

Depending on the public interest in the potential impacts of the sub-projects, a public hearing may be requested to better convey concerns. Once the sub-project has been reviewed and cleared, the implementers will inform the public about the results of the review. This approach would be consistent with Bank's OP 4.01 as well as Nigeria's efforts to enhance its participatory planning process.

8.9 Monitoring and Evaluation

Sub Project Monitoring: Monitoring is a systematic measurement of how a sub project is performing; it is part of the overall supervision of a sub project. From environmental and social point of view, it is of interest to determine that mitigation measures are being properly implemented, that environmental contractual measures are being respected, that construction is proceeding in accordance with the agreed design standards, and that no unforeseen negative impacts are occurring as the result of sub project execution.

Environmental monitoring needs to be carried out during the construction as well as operation and maintenance of the sub-projects. The responsibilities for monitoring and evaluation of the mitigation measures adopted under the sub-projects would be assigned as follows.

CPMCs and LGRCs with the support of the MFTs will be responsible for the day to day monitoring and reporting of feedback throughout the life of the sub-project, specifically the monitoring of (i) the

environmental and social assessment work to be carried out on its behalf by consultants; (ii) overseeing the implementation of the Resettlement Action Plans; (iii) monitoring of environmental issues and the supervision of the civil works contractor during the construction process; (iv) monitoring of environmental issues during operations and during maintenance of the infrastructure and facilities when handed over to the communities after construction; and (v) submission of monitoring reports to the LGRC and eventual submission to the SA and the respective SEPA.

The monitoring and reporting will be done by members of the respective Community Project Management Committee (CPMC) of the communities/villages and the environmental specialist (or official responsible for environmental issues) at the local government councils who will be trained

8.9.1 Monitoring Indicators

The objectives for monitoring are: (i) to alert project authorities and to provide timely information about the success or otherwise of the EIA process as outlined in the ESMF in such a manner that changes to the system can be made, if required; and (ii) to make a final evaluation in order to determine whether the mitigation measures designed into the subprojects have been successful in such a way that the pre-subproject environmental and social condition has been restored, improved upon or worse than before.

A number of indicators would be used in order to determine the status of affected people and their environment (land being used compared to before, standard of house compared to before, level of participation in project activities compared to before, how many kids in school compared to before, health standard, how many clean water sources than before, how many people employed than before etc).

Therefore, the sub-project EA reports (i.e. either the ER Report, LEA Report, EIA reports/EIS) will set 3 major social-economic goals by which to evaluate.

- Affected individuals, households, and communities are able to maintain their pre-project standard of living, and even improve on it;
- Pre-subproject environmental state of natural resources, bio-diversity and flora and fauna, has been maintained or improved upon; and
- The local communities remain supportive of the project.

In order to assess whether these goals are met, the sub-projects will indicate parameters to be monitored, institute monitoring milestones and provide resources necessary to carry out the monitoring activities. The following parameter and verifiable indicators will be used to measure the process, mitigation plans and performance.

For the environmental and social safeguard screening process the following monitoring indicators are proposed:

- Number of sub-projects which have adopted the safeguard screening process as required by CSDP AF, evaluate the rate of adoption;
- How has the adoption of the safeguard requirements improved the environmental health and bio-physical state of the communities using/affected by the sub-projects; and
- What are the main benefits that member derive from the use of the safeguard process?

Economic benefits: (i) increase in achievement of sub-projects adoption of safeguard screening guidelines, and (ii) increase in revenue for local councils resulting from adoption of safeguard guidelines, compared with conventional practices.

Social benefits: Expected benefits from likely micro-projects e.g. increased enrolment in schools etc.

Environment benefits: (i) improvement in the sustainable use of Nigerian’s natural resources;

- Efficiency of sub-projects maintenance and operation performance;
- Number of environmental resource persons on CPMC and local government teams and who have successfully received EIA training in screening methods etc.; evaluate the training content, methodology and trainee response to training through feedback;
- Numbers of women trained; assess understanding of the need for the EIA process as a tool for sustainable development;
- Overall assessment of (i) activities that are going well (ii) activities that need improvements and (iii) remedial actions required;
- Is the screening process identified in this ESMF working well; and
- Based on the performance of the sub-project performance review, what, if any, changes to the ESMF, and additional training capacity building, are required to improve the performance of the framework’s implementation.

8.9 Summary of Environmental and Social Management Process

Table 8.1 summarizes the environmental and social management process by phase and responsibilities.

Table 8.1 Environment and Social management cycles by phases and responsibilities

Cycle	Phase	Activities	Responsibilities
PLANNING	Scoping and Screening	<ul style="list-style-type: none"> • Initial site visit & consultations. • Identification of technical, environment and social issues and applicable safeguards policies • Categorization • Action plan • Screening Report • <i>WB No-Objection</i> 	Consultant; Supervision by SA/SEPA/State Environmental Ministry FMENV
DESIGN	Preparation of ESMP and RAP (if applicable) and consultations	<ul style="list-style-type: none"> • Draft ESMP • Draft RAP (if applicable) • Consultations • <i>WB No-Objection</i> 	Consultant; Supervision by SEPA/State Environmental Ministry FMENV
	Disclosure	<ul style="list-style-type: none"> • Disclosure of ESMP/ RAP locally & to WB InfoShop 	FPSU/State Agencies FMENV; World Bank
	Finalization and Incorporation	<ul style="list-style-type: none"> • Final version of ESMP/RAP • Incorporation of ESMP into contract documents • <i>WB No-Objection</i> 	Consultant; Supervision by State Agencies
EXECUTION	Implementation and monitoring	<ul style="list-style-type: none"> • Implementation • Monitoring & reporting on environmental and social mitigation measures 	Contractors / CPMCs Supervision by State Agencies /LGRC & the Community
OPERATIONS (POSTCOMPLETION)	Operations and maintenance	<ul style="list-style-type: none"> • Maintenance • Monitoring & reporting on environmental and social mitigation measures 	Contractors /CPMCs Supervision by State Agencies /LGRC, SEPA/State Environmental Ministry

9 CAPACITY BUILDING AND TRAINING REQUIREMENTS FOR ENVIRONMENTAL AND SOCIAL MANAGEMENT

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

9.1 Environmental Training and Sensitization

Training and sensitization will be required at the levels of the SA, LGDOs, CPMCs, LGRC and community workers. The environmental specialist at the local government council and the SA's environment/social specialist or natural resource management specialist will be responsible for providing the required specialists to deliver a range of technical training on environmental and social issues to these groups.

For each group, training will be provided to bring them to a different level of expertise in different areas, and would include:

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

The objectives of the training/capacity building efforts under CSDP AF will be to:

- Support communities to mainstream environmental and social issues in their sub-projects.
- Ensure that LGAs have the capacity to assist communities in preparing sub-project proposals, to appraise, approve and supervise the implementation of sub-projects; and
- Strengthen the capacity of local NGOs and other services providers to provide technical support to communities in environmental and social aspects of the sub-projects.
- Support vulnerable groups especially those that are physically challenge to acquire new skills.

The target audience for training, sensitization and capacity building, will inter-alia include the following:

- CSDP Project Coordinators
- CPMC Team
- LGDOs
- LGRC Team
- LGAs Staff involved in environmental and social concerns
- Environment/social specialist (or NRM officer) at the SA
- NGO's/CBOs
- Local Service Providers

The training will follow the programme in Table 9.1 below.

Table 9.1 Institutional Capacity Strengthening Program

Target Audience	Description	Application	Duration
SPIA staff, LGRC, MFTs and CPMC	General environmental awareness seminar that will include ecological and social science principles, legal responsibilities, consequences of non-sustainable development, costs of poor environmental decisions, and introduction to the EIA process.	Personnel require appreciation of WB's, Federal/State environmental policies, as well as, an appreciation for the need to support environmentally sustainable development.	Three days seminar
SA's Environmental specialist, SEPAs and LGA environmental and social specialists	An in-depth comprehensive course on environmental management including legal requirements, EIA methodology, Impact determination (methods) and mitigation analysis, public involvement methods, ESMP preparation, monitoring techniques, preparation of EIAs, TORs, and other. Course will include field visits and classroom exercises.	The target audience will be responsible for EA review at the State level and for preparing TORs for EIA consultants as well as monitoring consultants' work and final approval of EIAs. Target audience will also be responsible for conducting environmental audits on selected sub-projects and for periodic monitoring of sub-project implementation to ensure compliance.	10 days workshop
CBOs/NGOs, other local government staff	General environmental awareness seminar that will include ecological and social science principles, legal responsibilities, consequences of non-sustainable development, costs of poor environmental decisions, and introduction to the EIA process.	Local Government level staff requires an appreciation for the WB's and Nigerian environmental requirements, as well as, an appreciation for the need to support sustainable development.	One day

The cost estimates are based on the assumption that resource persons are likely to come from other parts of the country and therefore require travel allowances; participants will come from local communities and attend during the day only but will receive a per diem.

These estimates include an allowance for travel expenses. It is proposed that the training programme will be implemented two times a year, over first four years of the project cycle.

The total cost is estimated at US \$ 300,000.

10 BUDGET FOR ESMF IMPLEMENTATION

Estimated Budget for the Implementation of CSDP AF Environmental and Social Management Framework

Table 10.1: Estimated Cost for ESMF implementation

Activity	Unit Cost (\$)	Total Cost	Basis of Estimates
ESMF preparation	45,000	45,000	This estimation include cost for census, public consultations and ESMF report preparation
ESMF implementation	150,000	150,000	Estimate based on comparable projects approved by the World Bank, adjusted to cover inflation. Cost per sub-project will depend on the number of factors including frequency of visiting.
Environmental Training and Capacity Strengthening Program	300,000	300,000	Estimates include an allowance for travel expenses for resource persons
Provision of technical assistance	145,000	145,000	Assumes assistance will be provided by project at no additional cost.
Contingency fund for other costs such as sub-projects ESMP or EIA	100,000	100,000	
Total	740,000	740,000	

11. STAKEHOLDER CONSULTATIONS

Stakeholders' consultations were held in Birnin Kebbi (Kebbi State), Umuahiah (Abia State), Gombe (Gombe State) and Minna (Niger State). The outcomes of the consultations are that:

- In CSDP AF, State Agencies should designate an Environmental Specialist and Natural resource Management officer who will be responsible for day to day monitoring and reporting feedback on environmental and social assessment work by him/herself or by the service provider and also monitoring of environmental issues during operations. This is a welcome development as designating an officer at the Agency level will ensure full implementation of ESMF.
- That sub-projects funded under component 4 should undergo same environmental screening process and procedures like those funded under component 3 irrespective of the nature, composition and location of the beneficiary.

ANNEX 1

SUMMARY OF WORLDBANK ENVIRONMENTAL AND SOCIAL SAFEGUARD POLICIES

- ***Environmental Assessment (OP 4.01)***. Outlines Bank policy and procedure for the environmental assessment of Bank lending operations. The Bank undertakes environmental screening of each proposed project to determine the appropriate extent and type of EA process. This environmental process will apply to all sub-projects to be funded by CSDP AF.
- ***Natural Habitats (OP 4.04)***. The conservation of natural habitats, like other measures that protect and enhance the environment, is essential for long-term sustainable development. The Bank does not support projects involving the significant conversion of natural habitats unless there are no feasible alternatives for the project and its siting, and comprehensive analysis demonstrates that overall benefits from the project substantially outweigh the environmental costs. If the environmental assessment indicates that a project would significantly convert or degrade natural habitats, the project includes mitigation measures acceptable to the Bank. Such mitigation measures include, as appropriate, minimizing habitat loss (e.g. strategic habitat retention and post-development restoration) and establishing and maintaining an ecologically similar protected area. The Bank accepts other forms of mitigation measures only when they are technically justified. Should the sub-project-specific ESMPs indicate that natural habitats might be affected negatively by the proposed sub-project activities without suitable mitigation measures, such sub-projects will not be funded under the CSDP AF.
- ***Pest Management (OP 4.09)***. The policy supports safe, affective, and environmentally sound pest management. It promotes the use of biological and environmental control methods. An assessment is made of the capacity of the country's regulatory framework and institutions to promote and support safe, effective, and environmentally sound pest management. This policy will most likely not apply to CSDP AF
- ***Involuntary Resettlement (OP 4.12)***. This policy covers direct economic and social impacts that both result from Bank-assisted investment projects, and are caused by (a) the involuntary taking of land resulting in (i) relocation or loss of shelter; (ii) loss of assets or access to assets, or (iii) loss of income sources or means of livelihood, whether or not the affected persons must move to another location; or (b) the involuntary restriction of access to legally designated parks and protected areas resulting in adverse impacts on the livelihoods of the displaced persons. The RPF report discusses the applicability of this policy in detail.
- ***Indigenous Peoples (OD 4.20)***. This directive provides guidance to ensure that indigenous peoples benefit from development projects, and to avoid or mitigate adverse effects of Bank-financed development projects on indigenous peoples. Measures to address issues pertaining to indigenous peoples must be based on the informed participation of the indigenous people themselves. Sub-projects that would have negative impacts on indigenous people will not be funded under CSDP AF.
- ***Forests (OP 4.36)***. This policy applies to the following types of Bank-financed investment projects: (a) projects that have or may have impacts on the health and quality of forests; (b) projects that affect the rights and welfare of people and their level of dependence upon or interaction with forests; and (c) projects that aim to bring about changes in the management, protection, or utilization of natural forests or plantations, whether they are publicly, privately, or communally owned. The Bank does not finance projects that, in its opinion, would involve significant conversion or degradation of critical forest areas or related critical habitats. If a project involves the significant conversion or degradation of natural forests or related natural habitats that the Bank determines are not critical, and the Bank determines that there are no feasible alternatives to the project and its siting, and comprehensive analysis demonstrates that overall benefits from the project substantially outweigh the environmental costs, the Bank may finance

the project provided that it incorporates appropriate mitigation measures. Sub-projects that are likely to have negative impacts on forests will not be funded under CSDP AF

- **Cultural Property (OPN 11.03).** The term “cultural property” includes sites having archaeological (prehistoric), paleontological, historical, religious, and unique natural values. The Bank’s general policy regarding cultural property is to assist in their preservation, and to seek to avoid their elimination. Specifically, the Bank (i) normally declines to finance projects that will significantly damage non-replicable cultural property, and will assist only those projects that are sited or designed so as to prevent such damage; and (ii) will assist in the protection and enhancement of cultural properties encountered in Bank-financed projects, rather than leaving that protection to chance. The management of cultural property of a country is the responsibility of the government. The government’s attention should be drawn specifically to what is known about the cultural property aspects of the proposed project site and appropriate agencies, NGOs, or university departments should be consulted; if there are any questions concerning cultural property in the area, a brief reconnaissance survey should be undertaken in the field by a specialist. CSDP AF will not fund sub-projects that will have negative impacts on cultural property.
- **Safety of Dams (OP 4.37).** For the life of any dam, the owner is responsible for ensuring that appropriate measures are taken and sufficient resources provided for the safety to the dam, irrespective of its funding sources or construction status. The Bank distinguishes between small and large dams. Small dams are normally less than 15 m in height; this category includes, for example, farm ponds, local silt retention dams, and low embankment tanks. For small dams, generic dam safety measures designed by qualified engineers are usually adequate. This policy does not apply to CSDP AF since the policy is not triggered under the project.
- **Projects on International Waterways (O 7.50).** The Bank recognizes that the cooperation and good will of riparians is essential for the efficient utilization and protection of international waterways and attaches great importance to riparians making appropriate agreements or arrangement for the entire waterway or any part thereof. Projects that trigger this policy include hydroelectric, irrigation, flood control, navigation, drainage, water and sewerage, industrial, and similar projects that involve the use or potential pollution of international waterways. This policy will not apply to CSDP AF
- **Disputed Areas (OP/BP/GP 7.60).** Project in disputed areas may occur the Bank and its member countries as well as between the borrower and one or more neighbouring countries. Any dispute over an area in which a proposed project is located requires formal procedures at the earliest possible stage. The Bank attempts to acquire assurance that it may proceed with a project in a disputed area if the governments concerned agree that, pending the settlement of the dispute, the project proposed can go forward without prejudice to the claims of the country having a dispute. This policy is not expected to be triggered by sub-projects. This policy is unlikely to be triggered by sub-projects to be funded by CSDP AF.

ANNEX 2

POTENTIAL POSITIVE AND NEGATIVE IMPACTS OF CSDP AF SUB-PROJECTS

Activity/Types of sub-project	Positive Impacts	Negative Impacts	Mitigation Measures
<p>1. Water Supply Infrastructure</p> <ul style="list-style-type: none"> ◆ Boreholes equipped with pumps; ◆ Rehabilitations of boreholes ◆ Development and rehabilitation of wells; ◆ Development of water storage reservoirs; ◆ Maintenance of water supply/storage infrastructure; ◆ Rehabilitation of water storage reservoirs, etc. 	<ul style="list-style-type: none"> ◆ Supply of potable water; ◆ Improvement of pastoral activities due to availability of water for livestock; ◆ Availability of water for agriculture and irrigation; ◆ Development of lowlands for vegetable and crop production; ◆ Improvement in raising the groundwater level; ◆ Creation of ponds favourable for fishing; ◆ Enrichment wildlife diversity; ◆ Improvement I health; ◆ Shortened distance to carry water, saving women’s and children’s labour; ◆ Improvement in overall we being; ◆ Increase in economic activity; ◆ Social networking increase in human capital. 	<ul style="list-style-type: none"> ◆ Increase in disease an insect vectors such as malaria, bilharzias, trypanosomiasis; ◆ Contaminated water by chemical pesticides and fertilizers; ◆ Soil degradation due to salinisation or alkalization, etc; ◆ Flooding due to poor maintenance of storage reservoirs; ◆ Loss of wildlife, vegetation and cultivated land; ◆ Overuse of water and surrounding land resources due to increase population pressures; ◆ Attraction of livestock and pressure on vegetation cover and soils with increase in erosion; ◆ Lowering or drying up of groundwater level; ◆ Lack of clear division of rights/responsibilities may result in maintenance problems of wells/pumps; ◆ Lack of clear definition of user rights for wells and pumps may create exclusion of vulnerable groups; ◆ Access to water may be captured by interest groups; ◆ Use of foreign equipment/ materials may hinder maintenance 	<ul style="list-style-type: none"> ◆ Employ suitable prevention and mitigation measures, including education of local population (e.g. good drainage around water supply points); ◆ Ensure planning, design, maintenance of infrastructure is appropriate to local needs, traditions culture an desires; ◆ Ensure sufficient community participation and organization of effective planning and management of infrastructure ◆ Include downstream water users (e.g. water supply, irrigation, livestock watering) in planning of water storage reservoirs ◆ Identify proper mechanism of rights and responsibilities over well/pump/reservoir usage through participatory village focus groups ◆ Ensure that local accessible materials are used when developing/rehabilitation wells in order to provide maintenance ◆ For each pump/well/ reservoir/borehole establish clear guideline of user right through participatory focus groups ◆ Ensure that access to water pumps/reservoirs is equitable to

		of pumps/wells	prevent capture by interest groups
2. Feeder Road Improvement/Infrastructure ◆ Construction and rehabilitation of rural and urban roads; ◆ Construction of bridges and crossing structures; ◆ Construction of buses stands ◆ Construction of foot path and foot bridges	◆ Improvement of communication; ◆ Connecting rural areas to principal road networks; ◆ Access to markets, transportation of goods and service overall positive impact on the economy; ◆ Facilitation of communication between neighbouring villages; ◆ Accessibility to village forests or other areas for land development and use; ◆ Improvement of commercial exchanges; ◆ Access to health and education centers.	◆ Destruction of vegetation in and near roadways; ◆ Deforestation; ◆ Increase in poaching and illegal and excessive removal of firewood and wood for rural construction purposes; ◆ Destruction of wildlife habitat; ◆ Impending wildlife movement; ◆ Reduction in biodiversity; ◆ Water pollution and negative affection on surrounding ecosystem; ◆ Loss of certain aesthetic values (visual impacts) from destruction of vegetative cover; ◆ Acceleration of soil erosion due to poor maintenance and drainage of roads; ◆ Noise and possible accidents during road construction; ◆ Increased migration from nearby cities; ◆ Social instability; ◆ Spread of communicable/ other diseases; ◆ Poor planning, construction/maintenance of roads may lead to water of a financial capital and human resources; ◆ Encroachment upon pasture/farm land.	◆ Avoid infringing on protected areas, critical habitats or areas with significant biodiversity (e.g. wetlands) ◆ Avoid areas of soil, slope or geological instability ◆ Provide comprehensive community participation in planning, construction and management ◆ Use appropriate design and construction techniques as timing (e.g. surface drainage controls, selection and use of construction materials, build during dry season, etc.) ◆ Migration issue to be resolved through local conflict resolution system ◆ Use of local labour in order to prevent spreads of communicable diseases ◆ Construction and repair of roads are performed using local materials/materials accessible in local market in order to ensure adequate/sustainable maintenance of roads and infrastructure ◆ Community decision making in selection sites for construction in order to avoid encroachment upon productive land
3. Social and Economic Infrastructure ◆ School construction and	◆ Facilitate the placement of teachers; ◆ Improved education levels;	◆ Sanitation problems; ◆ Some construction related problems but usually minor in	◆ Ensure inclusion of adequate sanitation facilities and maintenance

rehabilitation; ◆ Literacy centers; ◆ Dispensaries; health posts; ◆ Agricultural storage warehouses; ◆ Cereal banks, etc.	◆ Access to education, improved literacy; ◆ Increased school attendance by young; ◆ Improved health care; ◆ Improved storage and conservation of agricultural inputs and production; ◆ Increased productivity; ◆ Improved well-being; ◆ Employment generation.	nurture; ◆ Medical waste disposal; ◆ Storage hazardous materials; ◆ Spread of disease from incoming laborers; ◆ The vulnerable groups (women, poor children, migrants, transhumant pastoralists) and the poor) may not benefit from infrastructure construction and rehabilitation; ◆ Schools/health posts may become abandoned due to the lack of commitment; ◆ Building infrastructure system alone without needs assessment may not benefit the community; ◆ Infrastructure investments may be misappropriated by governments institutions and agencies;	◆ Ensure planning, design and maintenance of infrastructure is appropriate to local needs, traditions, culture and desires ◆ Mandatory incineration of medical waste and proper storage of other hazardous materials ◆ Health checks (especially in regards to HIV/AIDS) for incoming labourers ◆ Conduct mandatory participatory focus groups with the vulnerable groups regarding infrastructure projects ◆ Before the start of each infrastructure project, develop comprehensive organizational and maintenance plan, commitment from local government and public to maintain school supplies, medical supplies, etc. ◆ Conduct needs assessment in areas of health, education and agriculture to ensure proper allocation of resources (for example, it may be the case that vaccination/diagnostic tools are more needed than the actual rehabilitation /construction of a health post) ◆ Establish transparent monitoring and evaluation system
4. Structural Support for Improving animal husbandry ◆ Grazing land rehabilitation; ◆ Marking off pasture lands;	◆ Modernization of pastoral practices; ◆ Secure access to pasture lands ◆ Land tenure institutional	◆ Risk of concentrating livestock numbers; ◆ Over grazing and loss of vegetative cover;	◆ Limit animal numbers or control access to grazing lands ◆ Control length of grazing time through introduction of rotational

<ul style="list-style-type: none"> ◆ Strengthening of a land tenure system ◆ Vaccination parks ◆ Reorganization and corridors for transhumant populations; 	<p>mechanism established at village, district and provincial levels;</p> <ul style="list-style-type: none"> ◆ Improved livestock productivity; ◆ Improved pasture management; 	<ul style="list-style-type: none"> ◆ Pressure on water points and resulting risk of pollution; ◆ Livestock diseases and sickness if numbers too high and too concentrated; ◆ Increased conflict between livestock herders and farmers/local population; ◆ Vulnerable groups' livelihoods 	<p>grazing, development of dry-season grazing areas and reserves</p> <ul style="list-style-type: none"> ◆ Strategic development and placement of water points ◆ Maintain regular animal health monitoring and vaccination programs ◆ Establish conflict resolution mechanism for each project village under the land tenure pilot project ◆ Integrate the vulnerable groups into each pasture management/land tenure project by making it a requirement to integrate the interests of the poor and vulnerable into the pasture management /land tenure project
<p>5. Structural Support for Improving Forestry</p> <ul style="list-style-type: none"> ◆ Development of natural and artificial forests; ◆ Establishment of nurseries; ◆ Recovery and restoration of deforested zones by direct seeding; ◆ Protection/conservation of nature reserves and fragile ecosystems; ◆ Development of pastoral zones; ◆ Reforestation; ◆ Develop plantations for firewood and other uses; ◆ Creation of village forests; ◆ Reorganization and training of communities in village forest management; ◆ Stream or river bank protection; 	<ul style="list-style-type: none"> ◆ Qualitative and quantitative regeneration of vegetation ◆ Improvement in wildlife habitat ◆ Inward migration of wildlife ◆ Reestablishment of rest tree species through forest plantations ◆ Soil fertility improvement and erosion control ◆ Improved soil drainage ◆ Availability of firewood and wood for other uses ◆ Reduced energy consumption ◆ Reduce in bush fires ◆ Better organization of hunting ◆ Reduction in poaching ◆ Development of eco-tourism ◆ Recovery and restoration of 	<ul style="list-style-type: none"> ◆ Plantation made up of mono species more vulnerable to disease, insects, fire, etc; ◆ Use of certain tree species can lead to decrease in soil fertility' nutrients, water, etc. ◆ Harvesting by clear cutting can expose soil to greater insulation leading to high soil water evaporation, degradation, etc. ◆ Increase in population pressures on forested areas with unintended results ◆ Introduction of foreign species may potentially disrupt Eco balance ◆ Households may lack fuel if alternative measures are not taken into an account 	<ul style="list-style-type: none"> ◆ Consider use of a variety of multipurpose and fast growing indigenous tree species and management practices to enhance disease, insect, and fire resistance ◆ Select tree species and management practices that promote sustainable soil and water conservation ◆ Educate local population on proper harvesting techniques and practices ◆ Include local population in the design, site selection, development and management of forested areas ◆ Take special care of not introducing foreign plant species

<ul style="list-style-type: none"> ◆ Wildlife protection; ◆ Management of hunting and fight against poaching; ◆ Development of apiculture in forested areas; ◆ Development of ecotourism; ◆ Fight against bush fires or forest fires ◆ Construction and maintenance of forest roads; ◆ Selective seasonal burning; ◆ Joint management of classified forests. 	<p>deforested area by direct seeding</p> <ul style="list-style-type: none"> ◆ Introduction of agro forestry ◆ Enhancing general biodiversity ◆ (Temporary) employment generation 	<ul style="list-style-type: none"> ◆ People's livelihoods that are dependent on forestry/forest resources may worsen (e.g. Hunters) 	<p>that may cause disruption in eco-balance</p> <ul style="list-style-type: none"> ◆ Introduce sustainable practices of fuel wood gathering and hunting (rather than just restrictive measures)
<p>6. Component 4</p> <ul style="list-style-type: none"> ◆ Construction and maintenance of specialised skills centers, classrooms, health centers, ◆ Purchase of specialized tools and equipment, ◆ One time start-up grants into drug revolving funds, scholarship funds or other welfare funds for vulnerable groups 	<ul style="list-style-type: none"> ◆ Reduce dependency of vulnerable people; ◆ Reduce street begging and other nuisance amongst vulnerable people; ◆ Improved education levels; ◆ Access to education, improved literacy; ◆ Increased school attendance by vulnerable group; ◆ Improved health care; ◆ Increased productivity; ◆ Improved well-being; ◆ Employment generation. ◆ Improve sense of belonging and social integration of the vulnerable groups (women, poor children, migrants, transhumant paternalists) 	<ul style="list-style-type: none"> ◆ Sanitation problems; ◆ Some construction related problems but usually minor in nurture; ◆ Medical waste disposal; ◆ Storage hazardous materials; ◆ Spread of disease from incoming laborers; ◆ May require training and retraining of specialists; ◆ Schools/health posts may become abandoned due to the lack of commitment; ◆ Building infrastructure system alone without needs assessment may not benefit the group; ◆ Infrastructure investments may be misappropriated by governments institutions and agencies; ◆ One time start-up grants may be misappropriated. 	<ul style="list-style-type: none"> ◆ Ensure inclusion of adequate and specialized sanitation facilities and maintenance the group ◆ Ensure planning, design and maintenance of infrastructure is appropriate to local needs, traditions, culture and desires ◆ Mandatory incineration of medical waste and proper storage of other hazardous materials ◆ Health checks (especially in regards to HIV/AIDS) for incoming labourers ◆ HIV/AIDS patients should be encouraged to actively participate ◆ Conduct mandatory participatory focus groups with the vulnerable groups regarding infrastructure projects ◆ Before the start of each infrastructure project, develop

			<p>comprehensive organizational and maintenance plan, commitment from local government and public to maintain school supplies, medical supplies, etc.</p> <ul style="list-style-type: none"> ◆ Conduct needs assessment in areas of health, education and agriculture to ensure proper allocation of resources (for example, it may be the case that vaccination/diagnostic tools are more needed than the actual rehabilitation /construction of a health post) ◆ Establish transparent monitoring and evaluation system ◆ Support involving one time start-up grants should procure direct investment rather than to the individual (eg, scholarships should be paid directly to the beneficiary institution).
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ANNEX 3A

ENVIRONMENTAL AND SOCIAL SCREENING FORMS

The Environmental and Social Screening Form (ESSF) has been designed to assist in the evolution of sub projects of the CSDP project in Nigeria. The form is designed to place information in the hands of implementers and reviewers so that impacts and their mitigation measures, if any, can be identified and/or that requirements for further environmental analysis be detailed.

The ESSF contains information that will allow reviewers to determine the characterization of the prevailing local biophysical and social environment with the aim to assess the potential subproject impact on it. The ESSF will identify potential socio-economic impacts that will require mitigation measures and/or resettlement and compensation. In addition, the ESSF will also identify potential impacts on natural habitat, health and quality of forest resource.

This form must be filled by the district staff after communities have identified the type of subproject to be implemented and form part of application.

PART A: General Information

- 1. Name of sub-project:
- 2. Sector:
- 3. Name of the Community:
- 4. Name of Ward
- 5. Name of Local Government Area
- 6. Name of Executing Agent
- 7. Name of the Approving Authority
- 8. Name, job title, and contract details of the person responsible for filling out this ESSF:
- 9. Name:
- 10. Job title:
- 11. Telephone Number: E-mail Address:
- Date:
- Signature:

PARTB: Brief Description of the sub project

Please provide information on the type and scale of the sub-project (area, required land, approximate size of total building floor area). Provide information about actions needed during the construction of facilities including support/ancillary structures and activities required to build it, e.g. need to quarry or excavate borrow materials, laying pipes/lines to connect to energy or water source, access road etc.

PART B: BRIEF DESCRIPTION OF THE ENVIRONMENTAL SITUATION AND IDENTIFICATION OF ENVIRONMENTAL AND SOCIAL IMPACTS

Describe the sub-project location, sitting, surroundings (include a map, even a sketch map)

Describe the land formation, topography, and vegetation in/adjacent to the project area.

Estimate and indicate where vegetation might need to be cleared.

1. Environmental sensitive areas or threatened species are there any environmentally sensitive areas or threatened species (specify below) that could be adversely affected by the project?

S/No	Description	Yes	No	Not known
1	Intact natural forests			
2	Riverine forest			
3	Surface water courses, natural springs			
4	Wetlands (lakes, rivers, swamp seasonally inundated areas)			
5	How far is the nearest wetland (lakes, river, seasonally inundated areas)			
6	Area of high biodiversity			
7	Habitants of endangered/threatened for which protection is required under Nigerian Law.			

2. Geology and Soils

S/No	Description	Yes	No	Not known
1	Is there any possibility of soil instability in the project area? E.g. black cotton soil, earthquake, landslide, subsidence			
2	Is there any possibility of the area having risks of large scale increase in soil salinity?			
3	Based on inspection, is there any possibility of the area being prone to floods, poorly drained, low-lying, depression or block run-off – water?			

3. Contamination and Pollution Hazards

S/No	Description	Yes	No	Not known
1	Is there any possibility that the project will be at risks of contamination and pollution hazards from and latrines, dump sites, industrial discharge etc.			

4. Lands

Description	Yes	No	Not known
A Are there farm lands in the project area			
B Will project result in more or improved farm lands			
C Will projects result in less or damaged farm land			
D. Will the project results in loss of crops, fruit trees or household infrastructures (e.g. livestock shed, toilets, granaries)			
E. Will the project interfere or block access, routes (e.g. for people, livestock etc.			

5. Soil Erosion

Description	Yes	No	Not known
A Will project help to prevent soil loss or erosion			
B Will project directly cause or worsen soil loss or Erosion			
C Could project indirectly lead to practices that could cause soil loss or erosion			
D It is necessary to consult a solid scientist?			

6. Slope Erosion

Description	Yes	No	Not known
A Does project involve modification of slopes?			
B Will project affect stability of slopes directly or indirectly?			
C Could project cause people or property to be located where existing unstable slopes could be a hazard?			
D It is necessary to consult a geo-technical engineer?			

7. Surface Water Quantity

Description	Yes	No	Not known
A Do surface water resources exist in project area?			
B Is information available on present land future demands on water resources as a result of the project			

C Will project help to increase or preserve available surface water supplies			
D Will project increase demand or cause loss of available surface water			
E Is it necessary to consult a hydrologist			

8. Surface Quality

Description	Yes	No	Not known
A Is current data available on existing water quality			
B Will project lead to additional natural or man made discharges into surface water			
C Will project help to improve or protect surface water quality			
D Could project cause deterioration of surface water quality			
E It is necessary to consult water quality expert			

9. Ground Water Quality

Description	Yes	No	Not known
A Do ground water resources exist in project area?			
B Is information available on demands on ground water resource as a result o the project?			
C Will project help to increase or preserve available ground water supplies?			
D			

Will project increase demand or cause loss of available ground water?			
E Is it necessary to consult hydrologist?			

11. Air Quality

Description	Yes	No	Not known
A Is information available on existing or quality?			
B Will project produce any air emission directly?			
C Will project help to reduce existing air pollution sources?			
D Could project lead to practices that worsen air quality			
E Could project lead to a change in engine or fuel use that could cause serous air problem?			

12. Noise

Description	Yes	No	Not known
A Is noise now a problem in project area?			
B Will project help in reducing undesirable noise Conditions?			
C Will project cause increases in noise generating conditions?			
D Could project cause movements of people to			

high noise level locations			
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13. Aquatic Ecosystems

Description	Yes	No	Not known
A Are there any aquatic ecosystems in the project area such as rivers, streams, lakes or ponds, which might be considered significant?			
B Will project affect the condition and use of these systems for human consumptions?			

14. Wetland Ecosystems

Description	Yes	No	Not known
A Are there any wetlands ecosystems in the project area such as marsh, swamp, flood plains, or estuary, which might be considered significant?			
B Will project affect the use or condition of such wetlands?			

15. Terrestrial Ecosystems

Description	Yes	No	Not known
A Are there any terrestrial ecosystems in the project area such as forest, savanna, grassland or desert which might be considered			

significant?			
B Will project affect the use or condition of such system?			

16. Endangered/ Threatened/Rare/Endemic/Species

Description	Yes	No	Not known
A Is the existence of endangered species in the project are knows?			
B Will project affect the habitant of any such species?			

17. Migratory Species

Description	Yes	No	Not known
A Do migratory fish, birds, or mammals use the project area?			
B Will project affect the habitat and numbers of such species?			

18. Beneficial Plants

Description	Yes	No	Not known
A Do non-domesticated plants occur in the project area which area used or sold by local people?			
B			

Will project affect these species by reduction their habitant and number in any way?			
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19. Beneficial Animals and Insects

Description	Yes	No	Not known
A Do non-domesticated animals occur in the project area which area used or sold by local people?			
B Will project affect these species by reducing their habitat and number in any way?			

20. Pest (Plants and Animals)

Description	Yes	No	Not known
A Are there currently any problems with pest (plants or animals) in the project area?			
B Are there any plants or animals in the area, which might become pest because of ecological changes brought about by the project?			
C Will project improve increase the habitat for such species?			

21. Disease Vectors

Description	Yes	No	Not known

A Are there known disease problems in the project area transmitted through vector species?			
B Will project increase vector habitat?			
C Will project decrease vector habitat or provide opportunity for control			
D Are there clinics or other disease control programmes in operation or planned for the area?			
E Is it necessary to consult a public health officer?			

22. Resource/Land Use

Description	Yes	No	Not known
A. Are lands in the project area intensively developed?			
B. Will project increase pressure on land resources?			
C. Will project result in decreased holdings by small land owners?			
D. Should a land use planner be consulted?			
E. Will project result in involuntary land take?			

23. Energy Source

Description	Yes	No	Not known
A. Will project increase demand for conventional energy sources?			

B. Will project create demand for demand for other energy sources?			
C. Will project promote supply of conventional energy sources?			

24. Degradation of Resources during construction

Description	Yes	No	Not known
A. Will the project involve considerable use of natural resources (construction materials, water spillage, land energy/ that may lead to depletion or degradation at point source			

25. Distribution Systems

Description	Yes	No	Not known
A. Will project enhance the equitable distribution of agricultural and/or manufactured products?			
B. Will project increase demand for certain commodities within or outside the project area?			
C. Will project result in decrease in production of certain vital commodities			
D. Will project enhance equitable distribution of benefits?			

26. Employment and Income

Description	Yes	No	Not known
A. Will project increase the rate of employment?			
B. Will project remove job opportunities from the area?			

C. Will project increase/decrease income sources or means of livelihood?			
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27. At-Risk Population

Description	Yes	No	Not known
A. Are the adverse impacts of the project unequally distributed in the target population?			

28. Land Acquisition and Livelihoods

Description	Yes	No	Not known
A. Will land be acquired?			
B. Will people's assets or livelihoods be impacted?			
C. Will people lose access to natural resources?			

29. Existing Population

Description	Yes	No	Not known
A. Are there currently any people living in or near the project area?			
B. Will project affect people in or near the project area?			
C. Has liaison been established with the community?			
D. Will community participation in projects design and implementation be necessary?			
E. It is necessary to consult a sociologist?			

30. Migrant Population

Description	Yes	No	Not known
A. Are there currently any mobile groups in the target population?			
B. Will project result in the movement of people in or out of the area?			
C. Is it necessary to consult a sociologist?			

31. Cultural and Religious Values

Description	Yes	No	Not known
A. Are cultural characteristics unique to the project are understood?			
B. Will project adversely affect religious and /or cultural attitudes of area residents?			
C. Are there special superstitions or taboos that will affect acceptance of the project?			

32. Tourism and Recreation

Description	Yes	No	Not known
A. Is there at present a significant degree of tourism in the area?			
B. Is there unexploited tourism or recreation potential in the area?			
C. Will project adversely affect existing or potential tourist or recreation attractions?			

33. Natural Habitat

Description	Yes	No	Not known
A. Will the project involve conversion of a			

natural habitat in the area?			
B. Will the project trigger or catalyze activities leading to conversion of natural habitat?			
C. Will project increase illegal access to protected area or natural habitat of significant biodiversity?			

34. Forests

Description	Yes	No	Not known
A. Will the project have impacts on health and quality of forests?			
B. Will the project affect the right and welfare of people and their level of dependence upon or interaction with forests?			
C. Will project bring about changes in the management, protection or utilization of natural forests or plantations irrespective of the ownership?			

35. Maintenance and Repairs

Description	Yes	No	Not known
A. Will the project require frequent maintenance and repair			

CONCLUSION:

Summarise the table	Safeguard Requirements
All the above answers are “No”	If the above answers are “No”, there is no need for further action.

There is at least one “Yes”	If there is at least one “Yes”, there is no need for further action.
There is at least more than one “Yes”	If there is at least one “:Yes”, then Simple Environmental Review (ER), Limited Environmental Review (LEA), or Full Environmental Impact Assessment (EIA) is required.

Which courses (s) of action do you recommend?

- No further action if sub-project has no impacts on environment
- Simple Environmental Review (ER) if sub-project may create a few minor and easily mitigatable environmental problems.
- Limited Environmental Review (ER) if sub-project may create minor environmental problems that requires site visit or construction modifications to minimize or eliminate impact
- Full Environmental Impact Assessment (EIA) if the sub-project will result into potentially significant direct or indirect adverse impact as per FMEnv guidelines
- Resettlement Action Plan (RAP) if the sub-project will result in resettlement of affected people.
- Any other recommendation (Explain)

This form has been completed by:

Name:
Title:
Date:
Signature:

Approved by the LGRC Chairman.

Name:
Title:
Date:
Signature:

-ANNEX 3B –

CHECKLIST FOR SUB PROJECT

The environmental and Social Form (ESSF) is described below. It serves a sample checklist, which will be adapted to the particular sub-project type and circumstance of the sub-project.

1 ENVIRONMENTAL CHECKLIST FOR PUBLIC BUILDINGS SUB –PROJECTS
(Schools, Dispensary, Markets, Latrines and Sewage System)

<i>Stage</i>	<i>Potential Negative Environmental impact</i>	<i>Tick relevant</i>	<i>Mitigation measure</i>	<i>Tick relevant</i>	<i>Responsible person</i>
Before construction	Displacement of habitat		Prepare Resettlement Action		
			Plan as per OP 4.12		
	Loss of farming land				
	Sloppy land and hilly site, landslide and erosion		Terracing		
			Excavation to level		
			Control of water flows		
	Pit formation from sand mine		Use of sand from located areas		
			Backfill pits		
	Pit formation from clay soil demand for brick moldings		Backfill pits		
	Pressure on fire wood demand for brick curing (Deforestation)		Planting fuel wood fast growing trees		
			Buying fuel wood from recognized dealers		
	Cement dust pollution during block making		Use of masks		
During construction	Noise during construction		Use of ear protector		
	Cement dust pollution during construction		Dust control by water or other means		
	Pressure on existing water sources		Use of rain catchment as source of water for		

			construction Provision of more local wells		
	Pressure on timber required for supports, door/widows and furniture (deforestation)		Planting of fast growing tree species		
			Buying poles, timber and furniture from recognized dealers		
			Use of steel and iron material /furniture		
	Large number of laborers to the site (Human waste) Building of latrines				
After construction	Solid waste of concrete, bricks, blocks, colors stains on floor etc.		Demolition of concrete batching sites		
			Removal of all paints remains		
	Used tools and equipments		Removal from site		
	Medical waste from dispensary (health post)		Construction of special designed system for deposal of waste		
	Odour problem (market, slaughter houses)		Appropriate design and siting of sub projects. Install fish cleaning basin		
	Unpleasant Odours (latrines)		Introduce odour control technology in design and disposal of waters from toilets/latrines		
	Sewer gas leaks and vent pipe		Monitoring programs and community participation		
	Destructive effect of strong wind to the building		Planting of trees to serve as wind breakers to the building. Ensuring proper building orientation to avoid wind direction.		

This form has been signed by:

Chairperson of the CPMC (Full Name).....Signature.Date

Member of Community Management Organization (Full Name).....Signature.Date.....

Date.....

ENVIRONMENTAL CHECKLIST FOR WATER SUPPLY SUB PROJECTS

S/N o	<i>Potential Negative Environmental impact</i>	<i>Tick relevan t</i>	<i>Mitigation measure</i>	<i>Tick relevan t</i>	<i>Responsible person</i>
1.0	Shallow Wells with/without Hand pump				
1.1	Overexploitation of aquifers		Consult Regional Hydro-Geologist		
1.2	Creation of stagnant pools of water		Proper drainage near pumps		
1.3	Contamination by seepage from pit latrines		Position latrines at least 50m from the well		
1.4	Waste water from nearby washing/ bathing facilities		Proper drainage from bath/washing Facilities		
1.5	Inadequate wastewater disposal		Proper drainage		
2.0	Piped Water Supply				
2.1	Conflict over water use rights		Consult Basins Water Officers before implementation of the project		
2.2	Over abstraction of water source		Consult Basins Water Officers before implementation of the project		
2.3	Contamination of water by human excreta at the water source		Minimize human activities at water sources. Proper design of water intakes		
2.4	Creation of stagnant pools of water at points of discharge		Improve design of the drainage system		
2.5	Conflicting demands for water use (social conflict)		Introduce proper management of water use		
2.6	Loss of agricultural productive land through erection of water structures		Siting not in most productive land		
2.7	Involuntary settlement		Alternative siting		
2.8	Contamination by livestock		Provide livestock trough		
2.9	Marred landscapes		Cleanup of construction sites		
2.10	Noise disturbance from pump station if near a home		Siting studies		
2.11	Sustainable management of water sources		Creation of user management committee Introduction of user fee		
3.0	Small Dams				
3.1	Loss of agricultural productive land		Siting not in most productive land		
3.2	Loss of natural vegetation		Re-vegetation		
3.3	Proliferation of aquatic weeds		Inner banks protected with appropriate breed		

3.4	Risks of children drawing		Fencing around the dam		
3.5	Marred landscape		Clean/landscape around dam site		
3.6	Loss of buildings or property		Compensation/ resettlement		
3.7	Disruption or destruction of wildlife		Minimize loss of natural vegetation during construction		
3.8	Involuntary settlement		Compensation/ resettlement		
3.9	Contamination of water by human excreta at the water source		Minimize human activities at water sources.		
3.10	Contamination by livestock		Provide livestock trough Fencing the dam		
3.11	Degradation of soil cover		Re-vegetation or soil stabilization		
3.12	Facilitate growth of weed e.g. water hyacinth		Keep clear of water hyacinth		
3.13	Conflicting interest over water use		Introduce proper management of water use		
3.14	Risks of water borne diseases		Correct design and adequate training		
4.0	Rain Water Harvesting				
4.1	Risk of children drowning		Fencing around the water system		
4.2	Loss of agriculture land		Siting not in most productive land		
4.3	Loss of natural vegetation		Re-vegetation		
4.4	Contamination by birds feaces		Simple water treatment		
4.5	Pollution by dust		Sedimentation process		
4.6	Contamination by livestock		Fencing around the water source		
4.7	Degradation of soil cover		Re-vegetation		
4.8	Marred landscape		Cleanup of construction sites		
4.9	Loss of buildings and property		Compensation/ resettlement		
4.10	Involuntary Settlement		Alternative siting		
4.11	Loss due to evaporation		Introduce water lilies Covering the reservoir		

This form has been signed by:

Chairperson of the CPMC (Full Name).....Signature. Date.

Member of Community Project Committee (Full Name).....Signature. Date.
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ENVIRONMENTAL CHECKLIST FOR RURAL ROADS SUB PROJECTS

S/No	<i>Potential Negative Environmental impact</i>	<i>Tick relevant</i>	<i>Mitigation measure</i>	<i>Tick relevant</i>	<i>Responsible person</i>
1	Erosion of lands downhill from roadbed or in borrow areas		Plant grass along edge of the road Construction in dry seasons		
2	Landslides, slips and slumps		Re-vegetation Physical stabilization of soil of erodible surfaces		
3	Creation of stagnant pools of water in left borrow pits		Rehabilitation of borrow pits sites		
4	Create dust to nearby house during construction		Dust control by water or other means		
5	Increased sediments into streams, ponds and rivers due to erosion from road tops and sides		Prevention of erosion by re-vegetation, dry construction and physical stabilization		
6	Decline in water quality due to high silt load		Prevention of erosion by re-vegetation, dry construction and physical stabilization		
7	Increased run-off and flooding conditions		Consider alternative alignment		
8	Increased access to forests, protected areas and increased risks of logging and poaching		Consider alternative alignment		
9	Disruption or destruction of wildlife		Minimize loss of natural vegetation during construction		
10	Threats to rare and endangered species		Consider alternative alignment		
11	Increased road kills due to higher speeds and traffic volume		Safety design introduced e.g. signs, speed humps in market areas and village centers		
12	Disturbance of historical or culturally important sites e.g. graveyards, monuments		Consider alternative alignment Special measures to protect cultural heritage sites		
13	Involuntary settlements		Alternative site to avoid or at least minimize resettlement		
14	Increased deforestation from an increase in agricultural and charco production		Alternative alignment		
15	Improper disposal of human excreta during construction		Consider on-site health facilities		
16	Social change		Awareness raising for behavior change		
17	Loss of buildings, property or economic		Compensation/re-settlement		

	livelihood				
18	Marred land Restoration of vegetation		Clean-up of construction sites		

This form has been signed by:

Chairperson of the CPMC (Full Name)..... Signature.....Date

Member of Community Project Committee (Full Name).....Signature.....
Date.....

ENVIRONMENTAL CHECKLIST FOR NURSERY/AFFORESTATION/REFORESTATION SUB PROJECTS

S/No	<i>Potential Negative Environmental impact</i>	<i>Tick relevant</i>	<i>Mitigation measure</i>	<i>Tick relevant</i>	<i>Responsible person</i>
1	Pressure on existing water sources due to watering seedlings		Provisional of more local wells		
2	Large number of laborers on the site (Human waste)		Building of latrines for labourers		
3	Pollution of polyethylene paper during tree planting		Collection of all polyethylene papers. Use of alternative local materials		
4	Social conflicts (Ownership of resources unclear)		Ownership and responsibilities to be established during project design		
5	No net increase or even loss of forest cover (clearing of existing vegetations to establish woodlots)		Alternative site to be considered		
6	Loss of productive agricultural land		Productive agricultural land to be avoided Use of agro forestry techniques. Consider use of already cleared or barren land for tree planting.		
7	Introduction of exotic species (Foreign species)		Use of indigenous species and provenance To avoid existing natural vegetations		
8	Displaced human settlements		Avoid area that requires significant or involuntary resettlement. Provide compensation for resettled families		

			and lost livelihood opportunities e.g. Cash, in-kind, employment, training		
9	Description of sites of cultural religious or historical importance		Avoid such sites, or incorporated them in the project sensitively and to the local peoples satisfaction		
10	Unsuitable forest production		Use a variety of multi purpose and fast growing indigenous tree species to enhance. <ul style="list-style-type: none"> • Effective use of site micro-climates and soil conditions • The diversity and flow benefits to local people. • Soil and water conservation. • Draw upon local central and knowledge and values in planning and operating forests. • Adapt imported technology (erosion control, forest management and harvesting) to local condition 		
11	Soil Erosion		Avoid areas of fragile or unstable soils/slopes. Avoid any project activities within k20-40m of streams, ponds. Leave existing grass/shrub cover on lands that re very steep or have shallow soils. Use soil conservation measures to prevent soil erosion.		
12	Pollution of groundwater and of surface waters and habitats		Avoid our using fertilizers, herbicides and pesticides. Avoid any use near water bodies		

This form has been signed by:

Chairperson of the CPMC (Full Name)..... Signature..... Date

Member of Community Project Committee (Full Name).....Signature..... Date

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ENVIRONMENTAL CHECKLIST FOR SMALL SCALE AQUACULTURE

S/No	<i>Potential Negative Environmental impact</i>	<i>Tick relevant</i>	<i>Mitigation measure</i>	<i>Tick relevant</i>	<i>Responsible person</i>
1	Land use conflicts		Avoid projects sites that require <ul style="list-style-type: none"> • Resettlement • Displacement of other important land uses • Encroachment of historical cultural or traditional use area • Encourage use of existing depressions, hollows and ditches • Limit areas converted to ponds • Good pond design and construction and maintenance to avoid pre-mature abandonment 		
2	Water supply conflicts by: <ul style="list-style-type: none"> • Social and economic disruptions to existing community water management practices and relationship • Conflicting demand on surface or ground water supplies 		<ul style="list-style-type: none"> • Ensure adequate community participation in the planning and operation of the project • Site ponds to avoid disrupting existing/traditional use of water • Develop ponds with other activities to combine water use 		
3	Creating habitats for disease carriers such as mosquitoes and snails and increasing the prevalence of water related disease e.g. malaria, schistosomiasis		<ul style="list-style-type: none"> • Assess ecology of disease carriers in the project area • Employ suitable privation and mitigation measures including education of local people • Monitor disease occurrence and public health indicators and take corrective measures as needed 		
4	Loss of ground cover and erosion at project sites		<ul style="list-style-type: none"> • Restrict area cleared for ponds • Construct ponds during dry season • Stabilize exposed soil with grasses and 		

			<ul style="list-style-type: none"> • other ground cover • Ensure good drainage and erosion control around ponds 		
5	Depletion of local fuel wood to dry fish		<ul style="list-style-type: none"> • Careful project planning and management to ensure sustainable source of fuel wood • Consider the need for small, complimentary forestry project. 		
6	Pollution of surface waters with aquaculture wastes		<ul style="list-style-type: none"> • Keep fish densities at moderate levels to reduce disease risk and need for antibiotics • Pump air through the water to speed up decomposition • Release pond water into water body with adequate dilution and dispersal capability. • Dilute pond water prior to release 		
7	Loss of wetlands, especially mangrove forests		<ul style="list-style-type: none"> • Site project well away form wetlands • Design project features to prevent disturbing water flows to and from wetlands 		

This form has been signed by:

Chairperson of the CPMC (Full Name)..... Signature..... Date

Member of Community Project Committee (Full Name).....Signature..... Date

Annex 3C: ENVIRONMENTAL REVIEW (ER) FORM

TYPE OF EXPECTED IMPACT	DESCRIPTION OF IMPACT	PROPOSED MITIGATION MEASURE
PHYSICAL ENVIRONMENT		
Increased soil erosion?		
Increased sediment load into receiving water?		
Likely contamination of surface of sub-surface water		
Excessive dust or noise during construction		
BIOLOGICAL ENVIRONMENT		
Removal or disturbance of natural vegetable		
Sub project in core or buffer area of a protected area		
Description of disturbance of animal or any locally important annual habitat?		
SOCIAL ENVIRONMENT		
Aesthetic degradation of a landscape?		
Degradation or disturbance of an historical or cultural sites		
Transport or use of toxic substance that pose a risk to human health		
Involuntary displacement of individuals and families		
Economic losses to individuals or families because of the sub project		
NATURAL HABITATS		
Conversion of natural habitats		
FORESTS		
Reduce forest biomass		
Bring about changes in management, protection and utilization of forests or plantations.		

The Form has been filled by:

Name:

Position:

Signature:

Date:

Approved by:

Name:

Position:

Signature:
Date:

Annex 3D: LIMITED ENVIROMENTAL ASSESSMENT (LEA) FORM

Note: This form must be completed for sub project that may pose minor environmental problems. The form must be filled by designated Environmental Officer and form part of sub project application.

Sub project Name:

Location (Village, Ward, LGA).....

Type of sub project:

Number of people benefiting the sub project:

General Description of the sub project:-

Sub project objectives:

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Sub project components:

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Baseline Description of affected Environment

Description of physical chemical environment (soil, air, water, etc.)

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Description of Biological Environment (habitats and Communities, Flora etc):

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Description of Socio-economic Environment e.g. historical sites, aesthetic aspects, public health, infrastructure

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Identification of Negative Environmental Impacts

Impacts in the physical-chemical environment (soil, water, water

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Impact on the Biological Environment (Flora, habitats and communities etc.)

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Impacts on the Socio-economic Environment (Historical, sites, aesthetic, public health,
infrastructure etc)
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Impacts on the Natural Habitats Environment
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Impacts on the Natural Forests including Plantations
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Mitigation Measures

Description of Impact

Mitigation Measures

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.....

Report prepared by:

Name:

Position:

Signature:

Date:

Approved by:

Name:

Position:

Signature:

Date:

-ANNEX 4-

PROCEDURES FOR SUB-PROJECT INVESTMENTS REQUIRING FULL EIA

Step 1: Screening

To determine the depth of EA required, potential impacts in the following areas need to be considered:

- Social issues
- Health issues
- Protected areas
- Cultural heritage, archaeological sites
- Existing natural resources such as forests, soils, wetlands, water resources
- Wildlife or endangered species habitats
- Natural habitats and
- Forests

Step 2: Scoping

To identify the relevant environmental and social issues, this step determines:

- Level of detail required for the EA
- Extent of the area to be covered in light of the potential impact zones
- Timeframe for the EA based on the potential impact zones
- Sequencing and scheduling of the various EA tasks
- Preliminary budgets

Step 3: Preparation of Terms of Reference for sub-project EAs

Based on the screening and scoping results. EA terms of reference will be prepared. A local (national) consultant will conduct the EA and the report should have the following format:

- Description of the study area
- Description of the sub-project
- Legislative and regulatory considerations
- Determination of the potential impacts of the proposed sub-projects
- Public consultations process
- Development of mitigation measures and a monitoring plan, including cost estimates.

-ANNEX 5-

SAMPLE MATRIX OF ENVIRONMENTAL MANAGEMENT PLAN (EMP)

NO	ENVIRONMENTAL AND SOCIAL IMPACT IDENTIFICATION	PROPOSED MITIGATION MEASURES	MONITORING	RESPONSIBILITY	SCHEDULE	COSTS AND SOURCE OF FUND
1	Contamination of the water source by livestock	Fencing of the water source Construct livestock trough	Inspect fence and ensure it is well constructed - Ensure the livestock trough has been constructed to specifications	CPMC - Local Government Engineer	During construction period During Construction period	Included in subproject budget Included in subproject budget
2	Relocation of or loss of shelter	Implementation of Resettlement Policy Framework	Ensure new land allocated and compensation done to affected group	- CPMC, LGRC - Commissioner for Land	Before commencement of the sub project	To be determined by land valuer as per compensation schedule
3	Minimal conversion of natural habitats	Habitat retention and post development restoration	Avoid to the extent possible impacts on natural habitats Where activities may affect natural habitats, ensure that mitigation measures (such as waste management plans, fencing to avoid induced impacts, signage, efforts to ensure animals may migrate safely, monitoring) are put in place Ensure adequate	- SA, CPMC, LGRC - Commissioner for Environment	Activities to include pre-construction, during construction and post construction	Included in subproject budget

			protection during retention and that the post development is properly carried out			
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**-Annex 6-
Component 4 Program Assessment**

Summary of Program Assessment			
Component 4	Safety net Programs		
	Micro credit Enterprises	Orphanage Program	Disabled skill acquisition Centre
Administrative Facility	Demanding, usually successful on small scale		
Political Feasibility	Good		
Collateral Effects	Complements growth		
Targeting	Excellent		
Tailoring solution to Problems	Improves lots of the Informal sector with growth during hard times		