



Environmental and Social Due Diligence

Kano Maradi Project

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Environmental and Social Due Diligence Assessment

Kano – Maradi Project
0726668



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ACRONYMS AND ABBREVIATIONS

Acronyms	Description
AFC	Africa Finance Corporation
BMP	Biodiversity Management Plan
CCRA	Climate Change Risk Assessment
CEFO	Local Security Organisation
CGM	Company-Community Grievance Mechanism
CH	Critical Habitat
CLO	Community Liason Officer
CPEP	Construction Project Environmental Plan
CPFESP	Construction Phase Framework Environmental and Social Plan
EHS	Environment, Health and Safety
EHSQ	Environment, Health, Safety and Quality
EIA	Environmental Impact Assessment

Acronyms	Description
EMS	Environmental Management Systems
EP4	Equator Principles 4
EPP	Emergency and Preparedness Plan
ERM	Environmental Resources Management
ESAP	Environmental and Social Action Plan
E&S	Environment and Social
ESDD	Environmental and Social Due Diligence
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
FM	Frequency Modulation
FMEnv	Federal Ministry of Environment
FMoT	Federal Ministry of Transport
GBV	Gender-Based Violence
GIIP	Good International Industry Practice
GRM	Grievance Management Procedure
GRI	Global Reporting Initiative
HIV	Human Immunodeficiency Virus
HR	Human Resources
H&S	Health and Safety
IBAT	Integrated Biodiversity Assessment Tool
IED	Improvised Explosive Device
IFC	International Finance Corporation
IMM	Impact Mitigation Monitoring
IMS	Integrated Management Systems
ISO	International Organisation of Standardisation
IUCN	International Union of Conservation of Nature
LRP	Livelihood Restoration Plan
LTI	Lost Time Injury
MEECA	Mota-Engil Engenharia E Construção África
MIA	Market Internal Audit
NTA	Nigerian Television Authority
OHSMS	Occupational, Health and Safety Management Systems
PAC	Project-Affected Communities
PAP	Project-Affected Persons

Acronyms	Description
PPE	Personal Protective Equipment
PPS	Performance Standard
QMS	Quality Management Systems
RAP	Resettlement Action Plan
RoW	Right of Way
SCSP	Social & Community Sustainability Plan
SEP	Stakeholder Engagement Plan
SHEQ	Safety, Health, Environment and Quality
TCFD	Taskforce for Climate-related Financial Disclosures
VPSHR	Voluntary Principles on Security and Human Rights
WMP	Waste Management Plan

EXECUTIVE SUMMARY

Environmental Resources Management (ERM) and EnvAccord Limited (EnvAccord) were appointed by Africa Finance Corporation (AFC) and its lenders to undertake an independent Environmental and Social Due Diligence (ESDD) assessment ('the Assessment') of a proposed dual gauge – passenger and freight railway line from Kano to Maradi which spans approximately 284km and is intended to improve transportation infrastructure between Nigeria and Niger. The Project is being developed and constructed by Mota-Engil Engenharia E Construção África (MEECA), based in Nigeria ("the Contractor"). It is noted that some aspects of E&S studies (including resettlement action planning and approval of the ESIA) are pending completion on the Niger side of the project, due to continued closed borders, restricting access to the rail alignment. This report therefore covers the E&S studies that have been conducted on the Nigerian portion of the project, and a rapid assessment (ground-truthing) of the Niger portion.

PROJECT DESCRIPTION

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

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

Overall, the main and ancillary components of the project include:

- Construction of standard gauge single rail line;
- Construction of 80 overhead bridges, 34 railway bridges, 9 underpasses, and 74 culverts (including box culverts);
- Construction of 13 stations – along the entire project corridor;
- Construction of ancillary buildings to support equipment for the operation of the rail (locomotive depot and maintenance, washing stations and coach servicing, refuelling points for locomotives, freight yard, integrated maintenance centres);
- Construction of permanent maintenance roads to support the operation of the railway; and
- Temporary works (preparation and earthworks) and tracks for construction, including construction camps and temporary access routes.

ASSESSMENT METHODOLOGY

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

The specific objectives of the assessment are outlined as follows:

- Assess the nature and structure of the Company's E&S Management System and its comparison to international best practice to test fitness for purpose;
- Review of Company EHS performance;
- Evaluate the adequacy of project environmental and social studies and management programs;
- Assess potential risks and liabilities from the acquisition of project-related land and resettlement including potential impacts on cultural heritage;
- Evaluate the potential for climate-related risks and opportunities presented by climate-related policy, changing climate conditions, and emerging technologies, among other potential impacts;
- Assessment of the Company's sustainability ambition/s;
- Determine the current state of compliance with any permits, and reasonably foreseeable legislation (i.e., within the next 12 months) on a country-wide basis;
- Investigate the possibility of contingent liabilities such as negative social impacts; and
- Assess capability / capacity of E&S staffing.

On the Nigerian portion of the project, a site visit was conducted by EnvAccord consultants Mr Pius Adejoh and Mr Raphael Lasabi (social) and Mr Charles Ogbezuode (environmental); while on the Nigerien portion, ground-truthing of the railway route was conducted by Mr Abdourhamane Hamidou (environmental) and Mr Soga Mourtala (social). In Nigeria, the site visit involved driving along the route alignment and visiting nearby affected communities during the period of 11 to 22 March 2024 by the respective consultants. In addition to the site visit, a series of interviews were held with Project-Affected Persons (PAPs). Focus group meetings were held with leaders and PAPs of Jiba Community in Sandanmu LGA of Katsina State; leaders and PAPs of Unguwar Dinya in Roni LGA of Jigawa State; and leaders and members of Hugungumai, Kunchi Quarry, Kano State. The number of participants ranged between 10 and 15 for each of the sessions (refer to *Appendix E* for attendance log). No interview was held with PAPs on the Nigerien side.

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

- The project will run through 122 communities in 25 LGAs across three States in Nigeria, and 11 communities in three communes in Niger Republic. In addition, according to the Supplementary RAP report, physical and economic displacement will involve loss of 12,695 residential houses, the loss of 2,064 complementary assets, and 19,238 economically displaced persons, within sections 1, 2, 4, 5, and 9 of the Nigerian portions. The valuation of sections 7 and 8 are ongoing. The project involves resettlement of communities along the railway route. However, these impacts are expected to be limited and can be addressed through appropriate social safeguards and mitigation measures.
- The project may pose health and safety risks during the construction and operation phases. However, these risks can be mitigated through implementation, training and adherence to in-country safety regulations and industry best practice.
- The project is expected to have environmental impacts such as land disturbance and potential disruption of natural habitats due to its linear nature.

SUMMARY OF FINDINGS

Overall ERM did not identify any red flags or critical risk rated findings that deem the project unsuitable for investment. ERM has not identified any findings that would require rectification as a Condition Precedent (CP), however some High-risk findings should be rectified as a matter of urgency. Please refer to the summary list below for all the High-risk issues identified on the Project. For detailed findings refer to Section 5 and for suggested mitigation measure to be implemented by the project, refer to the Environmental and Social Action Plan (ESAP).

As an overall summary, for Performance Standard (PS) 1, high risk findings were made around a lack of a formal permit management systems, and poor ESMS implementation. Subsequent to the first draft being issued, the Contractor has appointed additional Environmental and Social (E&S) officers and Community Liaison Officers (CLOs) in order to address the gaps noted and submitted a quarterly E&S monitoring report (30 April 2024) outlining toolbox talk topics, construction progress, and checklist inspections during the period. Three medium risks were identified on the lack of community emergency scenarios in the emergency response plan, and the requirements for improved monitoring and reporting aspects to lenders (this has subsequently been rectified in the quarterly E&S monitoring report). PS3 findings related to lack of formal waste disposal record keeping and lack of Greenhouse gas reporting in terms of Scope 2 and 3 emissions. PS4 findings related to the emergency response plan, which does not include community emergency management and the contractor is required to develop a formal security management plan with a clear statement of allowable force. PS5 findings related to gaps between Nigeria's land compensation rates and that required under the applicable standards. Displacement impacts are assessed in terms of Nigerian legislation, but fall short of applicable standards. PS6 findings relate to a lack of detailed maps and comprehensive species composition lists lacking in the ESIA and supporting Management Plans. However, these gaps are partly addressed through the pre-clearance checklist and monitoring plan in the Biodiversity Action Plan (BAP). It is noted that it would not be practical to redo the ESIA studies or mapping, thus the Pre-construction checklist in the BAP is of utmost importance to avoid biodiversity impacts.

SUMMARY OF HIGH-RISK FINDINGS:

PS1 – MANAGEMENT SYSTEMS

1. The Contractor is yet to receive EIA approval for the sections within the Republic of Niger. To date, the draft EIA report (18 May 2022) for Niger has been submitted to the government regulator for review; however, the regulator has indicated via a letter dated 24 May 2022, a preference for joint review and evaluation of the EIA and RAP by both government entities (Nigeria and Niger). The RAP is yet to be completed. The Contractor indicated that all work is currently halted on the Niger side, until the borders can be reopened. As of 2 August 2024, it is understood that the border has reopened.
2. The Contractor has developed an Environmental and Social Management Plan (ESMP) as part of the Nigeria ESIA and additionally has a group level ISO 14001 certified system as their Environmental and Social Management System (ESMS), which is broadly aligned to the IFC PS requirements. The ESMP/ESMS is poorly implemented on site. Many of the included plans and procedures could not be validated due to low and inconsistent implementation practises. Subsequent to noting this finding, the contractor has implemented E&S monitoring, and the first quarter report (30 April 2024) was

provided for review. The Contractor has employed five E&S officers and four CLOs to assist with ESMS implementation. These officers report to their respective line managers, who then report to Mr Luis Marcelino (E&S Manager for Nigeria), on a monthly basis.

3. The Contractor has appointed Allot Nigeria Limited, as the E&S consultant to support with the implementation of the ESMP, and the implementation assistance is in progress.
4. The majority of the EIA approval conditions in the ESMP are yet to be actioned and implemented through formal plans and procedures. A systematic procedure or action plan for addressing the conditions for EIA approval is not in place. It was noted that the additional E&S officer will focus on ESMP implementation and the use of the pre-clearance checklist. The checklist was provided for review and is fit for purpose.

PS2 – LABOUR AND WORKING CONDITIONS

1. All the employees receive an offer letter before their appointment, and within 3 months, they receive their employment contracts for signature, in accordance with Nigerian Labour Law.
2. The Contractor confirmed that the Project staff work 45 normal hours per week, between Monday to Saturday (8 hours per day from Monday to Friday plus 5 hours Saturday morning). The Employees may opt out of working overtime if they are not available. Workers are required to work for four Saturdays and two Sundays monthly.
3. The Contractor has recently revised their Employee Handbook, which outlines conditions for dismissal/ termination of employees in their contract letters (often due to misconduct). The termination letters refer to the employment Contract. Workers are terminated in accordance with the Nigerian Labour Law requirements. To date, there have not been any collective dismissals or retrenchment in any area of the project. The Contractor is actively recruiting and when works have ceased, they provide training and reconvert the worker to another position or area within the Project. Additional information provided by the Contractor post-assessment indicated that it has put in place a policy on retrenchment, which will be shared with the Consultants for review of adequacy and alignment with performance standards requirements.
4. 3. A corporate level Gender Based Violence (GBV) policy exists and includes clear lines of reporting. According to management, anyone can report any situation to any of the managers of the Project, through the DHC of the Project (Joao Elias) or the DHC of the Market (Sandra Bento) or through the Ethic internal email. This information is referred to during the onboarding process for all employees. Interactions with staff at the camp site indicated that some employees were not sure about the reporting line. It was further found that a An isolated sexual harassment incident occurred between a subcontractor and one if its a sub-contractor and a staff member. The Feedback from investigation [ed](#) by the Contractor indicated that measures are being taken to increase awareness about GBV and reporting procedures, and to ensure that, and subsequently all sub-contractors were required to undergo mandatory sexual harassment awareness and procedural training for their employees. Prior to engaging with the project, a suite of medical tests are conducted on applicants. Although interviews with the staff of the Contractor's Medical Unit indicated that HIV-positive applicants were excluded during recruitment, feedback from the Contractor revealed that the medical exams conducted during the admission process are the ones defined by the internal protocol of the Mota-Engil Group and do not include HIV/AIDS tests. The HR department does not see medical results, since they are kept confidential; however, they can see whether a potential employee is fit for work or not, based on their medical records. Despite this,

the Contractor has taken steps to outsource the Medical Unit to a new sub-contractor with a clear mandate to adopt international best practices. Prior to engaging with the project, a suite of medical tests are conducted on the relevant employees and contractors, including an HIV/AIDs test. Clinic management has recently been changed and is now run by an independent third party contractor who conducts the medical tests and keeps confidential records of all employees. HR does not have direct access to these records, in line with confidentiality and privacy requirements on their patients. The National Union of Civil Engineering Construction, Furniture and Wood Workers is the only union that approached the Contractor. Their members have visited the project to meet Mota Engil Employees. As of March 2024, HR did not have any records of employees affiliated with this or other Unions. However, the Contractor has reported ongoing discussions with the Union, which they hope may lead to the establishment of a local branch upon conclusion. Timelines for completion of actions are yet to be provided and should be verified in follow-on monitoring assessments. The Contactor routinely engages with two unions, and engages with staff on the matter. Workers are free to join and associate with the union of their choice.

PS3 – RESOURCE EFFICIENCY

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

PS4 – COMMUNITY HEALTH AND SAFETY

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

PS5 – LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

1. Compensation rates for loss of structures, crops, and trees is based on government rates with no adjustment for inflation or the provisions of the Land Use Act. This has resulted in a significant number of aggrieved persons. Furthermore, some PAPs' compensation was paid to the wrong individuals which reflects potentially unlawful behaviour in the process. Specifically, wrongful payments were made in Jiba Community of Sandanmu LGA, Katsina State. It was however learned from community engagement that the monies were recovered and redistributed among the rightful PAPs.
2. Loss of access to land is not addressed in the RAP/LRP documents, as these are developed to comply with the Land Use Act of Nigeria, which advocates for payment of compensation for improvements on the land and standing trees and crops. In addition, no considerations have been made towards replacement of for vulnerable persons and households, nor is the percentage of land lost to the project by a household considered in relation to payable compensation. According to the Contractor, this will be addressed in the Supplemental RAP review. The "Transitional allowance for vulnerable households" is considered in the Livelihood Restoration and Improvement Budget of the

Supplemental RAP, but is not in line with IFC PS requirements in terms of compensation.

3. Squatters and other persons with no formal land rights are not eligible for compensation, which is a misalignment with IFC requirements. Communal resources with customary rights are also not eligible for compensation. According to the Contractor, this aspect will be reviewed in the next Supplemental RAP update.

PS6 - BIODIVERSITY

1. Updated information from Ramboll E&S consultants (the supplementary ESIA consultants) noted that the African Spurred Tortoise (*Centrochelys sulcata*), is not a species of concern found on the project.
2. Although there are gaps in terms of providing clear habitat sensitivity maps, the BAP includes detailed pre-clearing checklists and procedures linked to the CESMP to identify and avoid sensitive environmental features.
3. As indicated under PS6-01, some forest reserves (refer to Appendix B for classification) are likely to be seasonal wetlands and are cleared for agricultural use, and this is superficially addressed in the ESIA, but it has not been adequately investigated and may lead to insufficient drainage being installed. This may potentially lead to further loss of protected areas ecosystem stability or where already modified to croplands, ecosystem productivity. It was noted that the pre-clearance checklist takes cognisance of these features and the mitigation measures that are required.

PS7 – INDIGENOUS PEOPLES

Not applicable

PS8 – CULTURAL HERITAGE

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

1. INTRODUCTION

1.1 BACKGROUND

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

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

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

1.2 OBJECTIVES OF THE ASSESSMENT

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

- Assess the nature and structure of the Company's E&S Management System and its comparison to international best practice to test fitness for purpose;
- Review of Company environmental, health and safety (EHS) performance;
- Evaluate the adequacy of project environmental and social studies and management programs;
- Assess potential risks and liabilities from the acquisition of project-related land and resettlement including potential impacts on cultural heritage;
- Evaluate the potential for climate-related risks and opportunities presented by climate-related policy, changing climate conditions, and emerging technologies, among other potential impacts;

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- Assessment of the Company's sustainability ambition/s;
- Determine the current state of compliance with any permits, and reasonably foreseeable legislation (i.e., within the next 12 month) on a country-wide basis;
- Investigate the possibility of contingent liabilities such as negative social impacts; and
- Assess capability / capacity of E&S staffing.

1.3 ASSESSMENT METHODOLOGY

1.3.1 SITE VISIT AND INTERVIEWS

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

TABLE 1-1 KEY PERSONNEL INTERVIEWS

Date	Location	Participants	Method of Engagement	Discussion Topics
13/03/2024	Project Manager's Office, Kazaure Camp Site	<u>Contractor:</u> Louis Suzano (Project Manager) <u>Sub-contractor:</u> Abubakar Marafa (Allot representative) <u>Lender Group:</u> Florentina Tchoffo (E&S Officer) Basse Uzodinma (E&S Officer) <u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi	In-depth interview	Status of work at the various sections; Emergency plan; Staff accommodation, Dams; relationship and monitoring of sub-contractors in the context of ESMP compliance, staff recruitment & welfare, GRM
11/03/2024	Human Resource Department, Kazaure Camp Site	<u>Contractor:</u> (Human Resources Representative)	In-depth Interview	Overview of Contractor; staff strength and composition; HR policy; Recruitment procedure; working conditions and terms of employment; workers

Date	Location	Participants	Method of Engagement	Discussion Topics
		Ummul-Khair Bala (Human Resources Technician) Abubakar Makama (Community Liaison Officer) Ismail Jamilu (Environmental Officer) <u>Sub-contractor:</u> Abubakar Marafa (Allot representative) <u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi		accommodation and transportation; Number of & relationship with and monitoring sub-Contractors' compliance with relevant labour laws; Existence and freedom to join Workers union; Collective bargaining principle; Policy on GBV; Internal GRM; 2 X Challenge
11/03/2024	Health Clinic, Kazaure Camp Site	<u>Contractor:</u> Nimatullahi Bashir (Medical Doctor) Garlos Cossa (Medical Doctor) Ibrahim Abubakar (SHEQ) Asse Ahsenti (SHEQ) <u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi	In-depth Interview	Staff strength at the clinic; Hours of service; common ailments; infectious diseases; availability of drugs; existence of HMO; Accidents; incidents within the camp site; medical checkups; first aids.
12/03/2024	Bristol Palace Hotel, Kano State	<u>Contractor :</u> Luis Marcelino (Environment and Social Manager) <u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi	In-depth Interview	Background/certification; staff strength in the Unit; availability and compliance with PPE; occupational incidents/accidents; emergency response unit; safety of working environment; safety of third-party practices and supply chain employees; community health and safety, community exposure to disease; dust control
14/03/2024	Conference Room, Kazaure Camp Site	<u>Contractor:</u> Luise Antones (Health and Safety Manager)	In-depth Interview	Competence of the health and safety staff, Availability of health and Safety policies, Level of awareness of the workers of the policies, Incidents, accident, near

Date	Location	Participants	Method of Engagement	Discussion Topics
		<p>Benet Size (Health and Safety Co-ordinator)</p> <p>Luis Marcelino (E&S Manager)</p> <p><u>Lender Group:</u> Florentina Tchioffo (E&S Officer) Bassey Uzodinma (E&S Officer)</p> <p>Health and Safety Coordinator</p> <p><u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi</p>		misses reporting, investigation and mitigation; staff training
11/03/2024	Security Department, Kazaure Camp Site	<p><u>Contractor:</u> Vitor Leits (Security Manager) Pedro Silvid (Deputy Security Manager)</p> <p><u>Security Sub-Contractor:</u> Jean-Paul Peaquin (GardaWorld Security Manager)</p> <p><u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi</p>	In-depth Interview	Security, experience of security personnel, Security risk assessments, drills and training; availability and relations with security sub-contractors, monitoring activities to ensure safety of personnel on site, human rights issues, level of compliance with international standards, security issues within the camp site, existence and management of security Issue from the community members
15/03/2024	Conference Room, Kazaure Camp Site	<p>Nuno Bento (Camp Site Manager)</p> <p>Abubakar Makama (CLO)</p> <p>Abdulwahab Usman (Community Liaison Coordinator)</p> <p><u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi</p>	In-depth Interview	Types and locations of accommodation; assessment of local housing market, beneficiaries, compliance with national and local housing standards; general living facilities, medical facilities, leisure and social facilities, workers' accommodation management
15/03/2024	Conference Room, Kazaure Camp Site	<p><u>Contractor:</u> Abubakar Makama (CLO)</p> <p>Abdulwahab Usman (CLC)</p>	In-depth Interview	Land acquisition, asset enumeration and valuation, compensation processes; consultations, disclosures, grievances, grievances

Date	Location	Participants	Method of Engagement	Discussion Topics
		<u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi		procedures, livelihood restoration
15/03/2024	Admin Office within the Filling Station, Kazaure Camp Site	Sub-contractor in charge of Diesel Supply <u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi	In-depth Interview	Awareness about the health and safety Policy of the Contractor, relationship with the Contractor and adherence to their policies, compliance with the labour policies of the contractor, level of compliance with international standards, availability of emergency preparedness, workers welfare
13/03/2024	Administrative Building Kazaure Camp Site	<u>Contractor:</u> Female staff (See Appendix) <u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi	Focus Group Discussion	Recruitment, employment status, workers' welfare, accommodation, transportation, availability of workers union, collective bargaining, pension, working hours, awareness about grievance complaint procedures, retrenchment activities, employment benefits, trainings received, incidence reporting, discrimination, GBV and forced, migrant and underage workers
13/03/2024	Kazaure Camp Site	<u>Contractor:</u> Male staff (see Appendix) <u>EnvAccord:</u> Prof. Pius Adejoh Raphael Lasabi	Focus Group Discussion	Recruitment, employment status, workers' welfare, accommodation, transportation, availability of workers union, collective bargaining, pension, working hours, awareness about grievance complaint procedures, retrenchment activities, employment benefits, trainings received, incidence reporting, discrimination, GBV and forced, migrant and underage workers
15/03/2024	Hugungumai, Kunchi Quarry, Kano State	Community Leaders, members and PAPs within Makolowa, Hugugumai, M.	Focus Group Discussion	Perception of the project, project impact on the communities, displacement and compensation issues, level of awareness about the

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

1.3.2 DOCUMENT REVIEW

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

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

1.3.3 ASSESSMENT AND REPORTING

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

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

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

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

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

1.4 MATERIALITY OF THE FINDINGS

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

TABLE 1-2 DEFINITION OF GAP RISK LEVEL

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

2. PROJECT DESCRIPTION

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

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

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

The main and ancillary components of the project include:

- Construction of standard gauge single rail line;
- Construction of 80 overhead bridges, 34 railway bridges, 9 underpasses, and 74 culverts (including box culverts);
- Construction of 13 stations – along the entire project corridor;
- Construction of ancillary buildings to support equipment for the operation of the rail (locomotive depot and maintenance, washing stations and coach servicing, refuelling points for locomotives, freight yard, integrated maintenance centres);
- Construction of permanent maintenance roads to support the operation of the railway; and
- Temporary works (preparation and earthworks) and tracks for construction, including construction camps and temporary access routes.

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

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

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



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

Track Design

Track design will follow European Rail Standards (Eurocodes) with the use of specified layers of ballast, precast concrete sleepers, and track. The Kano-Maradi alignment comprises gradients between 0% and 12.5%. This will ensure that the intended open line design speed of the railway for passenger trains (150 km/h) is achieved. The track is designed to have an axle load of 22.5 tonnes. The rails will be continuous over bridge structures and embankments; therefore, the bridge structures and the tracks (rails, sleepers, ballast, and embankments) are jointly designed to resist friction due to traction or braking.

The track laying will use 18 m (minimum) long rails, which will be electrically welded. The rail welding will be conducted in a workshop (located at the worker's construction camps) to prepare rail lengths of up to 144 m long rails which will be transported to site and laid on the sleepers to make up the track. These rails will then be connected in situ using thermit welding to form sections of continuous welded rail.

The total thickness of the track bed is 0.45 m, where a minimum ballast thickness of 0.25 m will be adopted under the sleepers and a thickness of 0.20 m for the sub-ballast layer.

Ballast

The track bed layers will be made up of ballast and sub-ballast. Ballast will be formed from 100% crushed granular material. Ballast will typically be made up of 30/60 mm crushed stones using hard, compact and homogeneous rock. Generally, the minimum ballast thickness of 0.25m will be placed under the sleepers. Specifically, the minimum thickness under sleeper is:

- 0.25 m for main, passing and crossing tracks; and
- 0.20 m for stabling and service tracks.

The sub-ballast layer is the support layer of the ballast and is also formed by using 100% crushed granular material and will have a thickness of 0.20m and designed to:

- Improve the bearing capacity by altering stiffness and achieving a better distribution of transmitted loads.
- Help to improve dynamic performance.
- Acts a filter between the subgrade and ballast; and
- Allow drainage of surface water.

Within yards and inside tracks, a total thickness of 0.35 m, (0.20 m of ballast under the sleepers and 0.15 m of sub-ballast) will be adopted.

Sleepers

Pre-stressed 2.60 m x 0.30 m concrete sleepers will be laid at intervals of 60 cm on along the main line. Sleeper spacing of 66.6 cm will be adopted on crossing tracks, sidings with heavy traffic and station tracks and 70 cm sleeper spacing will be adopted on other station tracks. The sleepers will be fastened with anti-vandalism sleeper screws.

Fencing

Fencing will be installed along the railway line. The fencing will be limited to areas in the urban crossing areas, mainly near the stations. Installation of fencing that prevents access to the workshop facilities, as well as to the goods yards will be considered. Suitable fencing will be placed around the boundaries of halts and stations.

Pedestrian, cattle and wildlife crossings will be placed as required along the railway line to reduce the barrier effect.

Bridges and crossings

A total of 83 structures will be constructed between Kano and Maradi and 46 along the Kano to Dutse branch line route. These will be a combination of overbridges (road overpassing the railway line with a multi span structure), overpasses (railway passing through a box culvert under the road) and underpasses (road passing through a box culvert under the railway line). Bridges and culverts will be constructed along the railway route. The typical railway bridge has a total width of 6.5 m comprising the 5 m wide single rail track two-side walkways.

Bridges will be constructed to span the entire bed within the flood zone for the designed return period. Bridges will be constructed using pre-cast concrete and transported to site to minimize disruption of construction activities.

3. CLIMATE CHANGE RISK REVIEW

3.1 INTRODUCTION

There is growing demand from investors and financial institutions for information on the potential impacts of climate-related risks and opportunities on company business plans and strategy. This includes the risks presented by climate-related policy, changing climate conditions, and emerging technologies, among other potential impacts.

The physical impacts of climate change pose a threat to business operations and may have financial consequences, through impacts of extreme weather events such as storms, floods, and droughts. The effect of these changes could result in business interruption through damage to physical assets. Understanding the nature of these risks will support sites in increasing their resilience against climate change.

This section provides a physical climate risk review for the Kano Maradi Project.

3.2 APPROACH

ERM conducted a high-level screening exercise and based on the results, identified key risks posed to the project site under future climate conditions. This included highlighting parts of the infrastructure and project lifecycle that are expected to be most vulnerable to climate change and allow the company to take this into consideration.

Following the risk review, ERM summarised mitigation at a high-level and recommended next steps / considerations which could be considered by MEA for material risk for construction and operation.

3.3 LIMITATIONS

This report provides a high-level review of the possible risks posed to the construction and operation phases of the railway line. There are limitations and assumptions that accompany this type of approach, which should be recognised when interpreting the results of this assessment, and these are summarised as follows:

- This is a fully desk-based screening, meaning that ERM's team has not conducted any on-site visits associated with this physical assessment, and thus assessments of the exposure of assets are based upon information provided by the Client and ERM's research.
- The projections data collated by ERM for use within this assessment originates from a range of providers, determined to be the best available for demonstrating the change in the hazards included within the screening.
- This screening uses projected outputs from Global Climate Models (GCMs). This means that GCM data has not been regionally downscaled and validated for areas where the data centres are located (no downscaling specific to Nigeria / Niger has been undertaken).
- This report does not include screening of the potential impact of seismic activity (e.g., earthquakes) on the railway line and its operations as these events are associated with, and induced by, seismic activity and therefore not considered a physical climate change event/hazard.

- The ERM team has mainly used publicly available information, platforms and other sources to gather baseline and future climate data of the project area. Hence, the team has not collected additional local data for the site's location (including local weather stations / meteorological agencies).
- ERM has made assumptions and limitations where there may be data gaps, e.g., related to the sites themselves.

3.4 CLIMATE SCREENING

3.4.1 NIGERIA

The northern region of the country experiences a Sahelian climate, characterised by hot and semi-arid conditions. Rainfall occurs solely from June to September, with amounts ranging from 500 mm to 750 mm. The remaining months of the year are hot and dry. Additionally, the areas are prone to significant annual variations in rainfall, which can lead to both flooding and droughts.

3.4.2 NIGER

Niger, located in the West Africa Sahel region, experiences a hot climate with high temperatures throughout the year. It has a long and intense dry season from October to May, followed by a short and unpredictable rainy season associated with the West African monsoon¹. The average annual temperatures range from 21.9°C to 36.4°C, but the mountainous areas are comparatively cooler. Rainfall varies from year to year, generally being lower in the northern part of the country (100-200 mm) and higher in the southern region (500-600 mm). Rainfall is limited to the summer months of June to September. The duration of the rainy season ranges from one to two months in the north and four to five months in the south.

The World Resources Institute (WRI) Aqueduct water data assesses drought risk accounting for overall water risk² shown in Table 3-1 below.

TABLE 3-1 BASELINE WATER RISK DATA

Climate Variable / Event	Historical Data per country	
	Nigeria	Niger
Drought Risk / Overall Water Stress	Kano: Extremely high (4 – 5) Dutse: High (3 – 4)	Maradi: Extremely High (4 – 5)

Source: WRI (Aqueduct)

3.5 FUTURE CLIMATE PROJECTIONS

Research by The World Bank Group (2021) suggests that temperatures in Nigeria will rise by approximately 2.9°C to as much as 5.7°C by the end of the century. Nighttime temperatures are

¹ Source: [Niger Climatology](#)

² "Overall water risk measures all water-related risks, by aggregating all selected indicators from the Physical Quantity, Quality and Regulatory & Reputational Risk categories. Higher values indicate higher water risk. "(WRI Aqueduct, 2019)"

expected to increase by up to 4.7°C. Additionally, the duration of heat waves is anticipated to increase by 8 to 55 days by the end of the century.

The World Bank Group (2022) predicted that water availability per capita in Niger will decrease by 76%. This decline will be especially prominent during the dry season. The increased occurrence of unpredictable rainfall and extreme drought, floods and thunderstorms are also projected.

The WRI Aqueduct offers projections to 2050 and 2080 under a pessimistic scenario³. Results for the country’s drought risk / the projected change in water stress is shown in Table 3-2.

TABLE 3-2 PROJECTED WATER STRESS

Climate Variable / Event	Historical Data per country			
	Nigeria		Niger	
	2050	2080	2050	2080
Drought Risk / Overall Water Stress	Kano: Medium to high (20 – 40%) Dutse: Low to Medium (10 – 20%)	Kano: High (40 – 80%) Dutse: Medium to High (20 – 40%)	Maradi: Extremely High (>80%)	Maradi: High (40 – 80%)

Source: WRI (Aqueduct)

3.6 PHYSICAL RISK REVIEW AND MITIGATIONS

3.6.1 RISK REVIEW

Drought, high temperatures and increased erratic weather events could have significant impacts on the construction and operation of a railway line. These weather phenomena could affect various aspects of the infrastructure and the project lifecycle, leading to delays, increased costs, and potential safety hazards.

3.6.2 CONSTRUCTION PHASE

Design

As stated, climate change could cause erratic weather events, including higher intensity rainfall. Higher intensity rainfall could cause increased stream runoff volumes, which could increase the river head, as well as the footprint of the river floodplain. An increased river head could cause the railway bridge to become submerged during flood events, while an expanded floodplain extend could require longer bridge spans in some areas.

³ The "pessimistic" scenario represents a fragmented world with uneven economic development, higher population growth, lower GDP growth, and a lower rate of urbanization, all of which potentially affect water usage; and steadily rising global carbon emissions, with CO2 concentrations reaching ~1370 ppm by 2100 and global mean temperatures increasing by 2.6–4.8°C relative to 1986–2005 levels.

Earthworks and Foundations

Drought could lead to soil moisture depletion, causing ground shrinkage and settlement issues. High temperatures could exacerbate these problems by drying out soils, making them more susceptible to erosion and instability. This could impact the stability of embankments, cuttings, and foundations, requiring additional stabilisation measures.

Water Supply

Drought conditions may limit the availability of water for construction activities such as concrete mixing, dust suppression, and construction workforce requirements. Alternative water sources or conservation measures may be necessary, increasing logistical challenges and costs.

Material Performance

High temperatures could affect the performance of construction materials such as asphalt, concrete, and steel. For instance, excessive heat could lead to concrete curing issues, asphalt softening, and thermal expansion of steel components, potentially compromising structural integrity.

3.6.3 OPERATIONAL PHASE

Track Maintenance

Drought and high temperatures could cause track deformation, rail buckling, and ballast degradation. These issues could increase the frequency and intensity of track maintenance activities, leading to operational disruptions and higher maintenance costs.

Increased flood volumes caused by increased rainfall intensity due to climate change could erode the railway line bed, especially in low lying areas, near streams and at bridge footings. This could increase the frequency and extent of track maintenance requirements, leading to increase operational disruptions and increased maintenance costs.

Electrification and Signalling Systems

High temperatures could impact the performance of electrification systems (e.g., overhead lines) and signalling equipment (e.g., signals, switches) through thermal expansion, electrical conductivity changes, and equipment overheating. Adequate cooling and maintenance protocols are essential to mitigate these risks.

Water Supply for Operations

In areas experiencing drought, securing sufficient water supply for operational needs such as locomotive cooling, firefighting, and station facilities becomes challenging. Water conservation measures and alternative water sources may need to be implemented.

3.6.4 MITIGATIONS

3.6.4.1 DESIGN AND PLANNING PHASE

The following mitigation measures should be considered during the design and planning phase of the project:

- Conduct comprehensive climate change risk assessments to identify additional physical risks, vulnerabilities, and potential impacts on the railway project.

- Incorporate climate resilience and adaptive design principles into engineering standards and specifications, considering factors such as soil moisture, thermal expansion of materials, and water management strategies.
- The bridge designs should take into consideration the possibility of increased runoff during flood events caused by increased rainfall intensity due to climate change.
- Design robust drainage systems to mitigate waterlogging and erosion risks during heavy rainfall events, ensuring proper slope stabilization and runoff management.
- Optimize alignment and elevation designs to minimize exposure to flood-prone areas and reduce the risk of inundation during extreme weather events.

3.6.4.2 CONSTRUCTION PHASE

The following mitigation measures should be considered during the construction phase of the project:

- Implement soil stabilization techniques such as geotextiles, soil cement mixing, and reinforced earth structures to mitigate the effects of drought-induced soil settlement and erosion, and/or increased erosion due to increase flood volumes.
- Utilize alternative construction materials or modify mix designs to improve the performance of concrete and asphalt in high-temperature environments.
- Install temporary shading and cooling measures for construction workers and equipment to mitigate heat-related health risks and ensure productivity.
- Implement water conservation measures, such as rainwater harvesting, recycling, and efficient usage practices, to reduce water demand for construction activities.

3.6.4.3 OPERATION AND MAINTENANCE PHASE

The following ~~mitigation~~mitigation measures should be considered during the operation and maintenance phase of the project:

- Regularly inspect and maintain track infrastructure, including ballast, rails, and sleepers, to address deformation, buckling, and degradation caused by high temperatures and extreme weather events.
- Regularly inspect the track infrastructure, including ballast, rails, sleepers, and bridge footings to assess impacts of flooding and associated erosion on the stability of the track.
- Implement vegetation management programs along railway corridors to reduce wildfire risks, including clearance zones, firebreaks, and vegetation monitoring.
- Upgrade electrification and signalling systems with heat-resistant materials, enhanced cooling mechanisms, and redundant backups to improve reliability and performance during temperature extremes.
- Develop contingency plans and emergency response protocols to address operational disruptions caused by weather-related incidents, ensuring timely recovery and minimal service interruptions.

3.6.4.4 MONITORING AND ADAPTATION

The following monitoring and adaptation measures are proposed:

- Install weather monitoring stations along the railway route to track temperature variations, precipitation levels, and other meteorological parameters, enabling real-time decision-making and adaptive management.
- Integrate climate resilience metrics and performance indicators into asset management systems to assess the effectiveness of mitigation measures and prioritize infrastructure upgrades.
- Collaborate with local authorities, environmental agencies, and community stakeholders to share climate data, coordinate emergency responses, and foster community resilience initiatives.

4. ASSESSMENT FRAMEWORK

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

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

Legal Framework:

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

IFC Performance Standards (2012):

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

Equator Principles 4 (2020):

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

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

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

African Development Bank Environmental and Social Safeguard (2023):

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

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

5. ASSESSMENT FINDINGS

5.1 ENVIRONMENTAL RISK CATEGORISATION

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

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

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

- The project will run through 122 communities in 25 LGAs across 3 States in Nigeria, and 11 communities in 3 communes in Niger Republic. In addition, according to the Supplementary RAP report, physical and economic displacement will involve loss of 12,695 residential houses, the loss of 2,064 complementary assets, and 19,238 economically displaced persons, within sections 1, 2, 4, 5, and 9 of the Nigerian portions. The valuation of sections 7 and 8 are ongoing. The project involves resettlement of communities along the railway route. However, these impacts are expected to be limited and can be addressed through appropriate social safeguards and mitigation measures.
- The project may pose health and safety risks during construction and operation phases. However these risks can be mitigated through implementation, training and adherence to in-country safety regulations and industry best practice.
- The project is expected to have environmental impacts such as land disturbance and potential disruption of natural habitats.

5.2 IFC PS ASSESSMENT FINDINGS,

5.2.1 IFC PS1 – ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS; AFDB OS 1, ENVIRONMENTAL AND SOCIAL ASSESSMENT

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

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

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

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

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>sections within Republic of Niger. The Contractor reported that the RAP is currently on hold due to the political situation in the Republic of Niger.</p> <p>The Contractor's obligations concerning the conditions for EIA approval are discussed under Management Programmes, such as the associated EMP and ISO14001 EMS.</p>	
Greenhouse gases (GHG)	<p>emissions; Technical Annex B provides an assessment of the greenhouse gas emissions from the project, baseline climate conditions in the study area, and future projections of climatic conditions to support a Climate Change Risk Assessment (CCRA), which are summarised as follows:</p> <ul style="list-style-type: none"> The GHG assessment is focused on Scope 1 and Scope 2 emissions during construction and operation. This includes: (1) emissions from fuel use during construction (Scope 1 emissions only, no grid electricity use is planned during construction); (2) emissions from land use conversion during construction; (3) emissions from fuel use during operation of the project (Scope 1 emissions, diesel fuel use by locomotives and emergency diesel generators); and (4) emissions from grid electricity use during operations (i.e., Scope 2 emissions). The GHG assessment was prepared in 2022. The project developer should confirm that the underlying fuel consumption estimates (both diesel fuel and electricity) are still appropriate. The grid emissions factor applied in estimating Scope 2 emissions might also need updating. The study concludes that operational GHG emissions will exceed 25,000 tonnes CO₂e per annum and are therefore considered to be significant. The IFC performance standards require an annual assessment of GHG emissions (in accordance with internationally recognized methodologies and good practice) if emissions are expected to exceed this threshold. 	<ol style="list-style-type: none"> V.A Draft ESIA Report: V.A 14 Technical Annexes: V.A14.b Annex B: Climate Change

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<ul style="list-style-type: none"> Emissions during the construction phase of the project are also expected to exceed 25,000 tonnes CO2e per annum. No estimates are provided of Scope 3 emissions; these are indirect value chain emissions, both upstream and downstream of the project. For example, the emissions associated with the production and transport of the raw materials used in the development of the project. The IFC Performance Standard (Performance Standard 3 on Resource Efficiency and Pollution Prevention) states that “the client will quantify direct emissions from the facilities owned or controlled within the physical project boundary, as well as indirect emissions associated with the off-site production of energy used by the project”. Therefore, the study is correct in focusing on the Scope 1 and Scope 2 emissions only, during construction and operational phases of the Project. Although not required by the IFC PS3, the GHG assessment could provide a high-level assessment of the GHG benefits associated with rail transport. Rail and waterborne transport have the lowest GHG emissions per kilometre of travel, when compared with road transport and aviation. To the extent that the project enables a mode shift from road to rail (for both cargo and passengers), the project will generate a net reduction in GHG emissions versus an alternative scenario without the rail project. These avoided emissions would provide additional context. 	
Physical Climate Change Risk Assessment (CCRA)	The Technical Annex B Climate Change Report from 2022, provides baseline climate conditions in the study area, and future projections of climatic conditions to support a Climate Change Risk Assessment (CCRA). The following are gaps in the CCRA report and recommendations and corrective actions for aspects that can be improved on / updated:	<ol style="list-style-type: none"> RfP: KanoMaradi ESIA Final – 02102020 V.A Draft ESIA Report: V.A 14 Technical Annexes: V.A14.b Annex B: Climate Change

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>Time Horizons missing: there is limited explanation and justification as to the time horizons that were used within this assessment, or if they have been aligned and adapted to the expected schedule of the construction, operational and decommissioning phases.</p> <ul style="list-style-type: none"> For physical climate risk, it is recommended to review trends over generally longer timeframes / time horizons, as it provides a clearer indication of possible emerging issues. The baseline and 2030 time horizons therefore should be provided as an insight to the possible climate trends for the construction stage and beginnings of the operational stage, whereas 2050 and 2080 should be used to provide insight to the climate trends towards the later stages of the operational and decommissioning phases. Corrective actions - the time horizons / timeframes that were used need to be provided as well as their justification. Additionally, information is required on whether they are relevant and adapted for the three phases of the project and not only for projections. <p>No detailed assessment on the Construction phase: the construction phase, even though it is only three years, also needs to be included in the Climate Change Risk Assessment:</p> <ul style="list-style-type: none"> Physical climate risks and trends need to be reviewed over generally longer timeframes as they provide a clearer indication of possible emerging issues. Hence, that is why the baseline (at least the last 30 years), and the 2030 timeframes are the basis / foundation to identify the risks and actual impacts on the project site receptors / project component and for the surrounding communities / areas that the railway line traverses during the construction phase. If the construction phase is missing from the detailed assessment, it does not show a complete picture of the project. As the passenger and freight railway line from Kano to Maradi is approximately 284km and will have at least 500m buffer on each side, it will traverse a variety of mixed and varied land use and topography. This 	

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>line will traverse: roads; rivers; powerlines; wetlands / floodplain areas; built up areas; towns; farming areas and communities. Therefore, all these aspects need to be considered within the construction phase.</p> <ul style="list-style-type: none"> • Corrective actions - the construction phase also needs to be assessed in detail for this project. <p>A more detailed site receptors (project component) list is needed: There is not a detailed list upfront as to which receptors / project component and / or what was assessed on site, e.g.: what site receptors / assets (element exposed) were used and evaluated against the identified Climate Hazards for the duration of the project (all phases). These are only mentioned later in the Operational Stage Climate Change Risk Assessment.</p> <ul style="list-style-type: none"> • There is only a very high level project component list for the phases. It needs to include more specific project details such as: what machinery, storage and materials, operations and structures, transport, infrastructure, and human aspects were included and considered. • The physical impacts of climate change pose a threat to business operations and their specific site receptor's and may have financial consequences through impacts of extreme weather events. The effect of these changes could result in business interruption through damage to physical assets (site receptors). Understanding the nature of these risks on all the site receptors will support the site in increasing its resilience against climate change and its various site receptors. • Corrective actions - a list of the various site receptors / assets that were evaluated needs to be provided upfront, including which ones are relevant for which phase of the project. <p>Site climate results: It would be beneficial to have climate results (for both baseline and projections) at a more local / site level scale as that gives more applicability to the site.</p>	

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<ul style="list-style-type: none"> Climate results for both baseline and projections that show more local / site level scale gives the current findings and projections more applicability and usability for the site. Corrective actions – more local / site level scale findings and projections need to be provided for the project for all phases. <p>Risk Scores: It would be valuable to provide risk scores before and after suggested mitigations were applied. Hence, it will show the effect that the mitigations may have on the ratings for each risk.</p> <ul style="list-style-type: none"> Having risk scores after mitigations shows the effect that the mitigations may have on the ratings for each risk, giving the mitigations more substance. Corrective actions – risk scores after mitigations need to be provided. 	
Management Programmes AfDB OS9: Financial Intermediaries	The following project-specific ESMPs are in place: <ul style="list-style-type: none"> Air quality management plan; Biodiversity management plan; Borrow pit management plan; Chance finds procedure; Cultural heritage management plan; Demolition management plan; Dust management plan; Hazardous materials management plan; 	<ol style="list-style-type: none"> ESMP FMEnv EIA approval – Kunchi Registration EIA permit – Katsina T.0063_S.26_C.5_Vol.1_259 - EIA Approval for the Proposed Construction of KAMA

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<ul style="list-style-type: none"> • Noise management plan; • Soil management plan; • Spill response plan; • Waste management plan; • Wastewater management plan; • Water management plan; and • Stakeholder engagement plan. <p>EnvAccord could not validate the adequacy and efficiency of implementing the ESMP measures on site, due to low and inconsistent implementation observed during the site visit. Various plans and procedures have been developed but it is unclear under whose role and responsibilities these fall. For example, periodic environmental compliance monitoring has yet to commence, whereas some aspects of biodiversity management are being implemented. No information on buffer zones around protected areas was provided for review. The Contractor reports that implementation of the ESMP measures will be managed by a third-party E&S consultant (Allott Nigeria Limited, the national ESIA consultant) and the process of agreeing on the scope and engaging the consultant is ongoing. No timeframe has been provided for completion.</p> <p>Furthermore, the Contractor is obligated to implement the following conditions for EIA approval, which have not been developed formally into policies or procedures:</p> <ul style="list-style-type: none"> • <i>Ensure Implementation of energy-efficiency measures during project construction and operation.</i> • <i>Develop an energy transition plan for the project.</i> • <i>Establish buffer zones for the project in accordance with regulatory standards.</i> 	

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<ul style="list-style-type: none"> • <i>Carry out appropriate sensitization campaigns during the project construction and operation.</i> • <i>Develop and fully implement Resettlement Action plan (RAP) for the project. A copy shall be submitted to the Federal Ministry of Environment.</i> • <i>Ensure that project implementation shall be in line with national and international best practices on cultural heritage sites, archeological sites and artefacts.</i> • <i>Ensure that all relevant regulatory standards are adhered to for the project development and operations.</i> • <i>Provide underpasses and bridges at intervals along the corridor to facilitate local traffic and livestock migrations.</i> • <i>Provide sufficient drainage in the form of culverts and/or subsurface drainage (in addition to above bridges) to avoid fragmentation of seasonal and perennial natural water flows and associated ecological corridors. Such drainage structures need to be aligned to anticipated climatic change.</i> • <i>Develop and implement a comprehensive Maintenance Management programme for the corridor.</i> • <i>Provide an adequate decommissioning and abandonment Plan for the project.</i> • <i>Ensure implementation of the Environmental Management Plan (EMP) for the project.</i> • <i>Develop and implement a Memorandum of Understanding (MoU) with the project's Host Communities. This shall be witnessed by all relevant regulatory authorities.</i> • <i>Ensure continuous consultations with the project's host communities, relevant regulatory authorities and other stakeholders throughout the project's lifespan.</i> • <i>Establish an Environmental Management System (EMS) for the project.</i> 	

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<ul style="list-style-type: none"> • <i>Preparation of an annual sustainability report which shall be submitted to the Environmental Assessment Department of the Federal Ministry of Environment.</i> <p>Similarly, being the operator of the Kano granite quarry, the Contractor is obligated as follows in fulfilment of EIA conditions for approval, which have not been provided for review:</p> <ul style="list-style-type: none"> • <i>ESO Terra Investment Limited shall develop and implement a Climate Change Mitigation and Adaptation Plan for the project.</i> • <i>ESO Terra Investment Limited shall implement energy-efficiency measures during project construction and operation.</i> • <i>ESO Terra Investment Limited shall develop an energy-transition plan for the project.</i> • <i>ESO Terra Investment Limited shall develop an environmental Protection and Rehabilitation Programme (EPRP) and Community Development Agreement (CDA) for the project to be approved by the Ministry of Mines and Steel Development (MMSD). Evidence of the approval shall be forwarded to the Federal Ministry of Environment.</i> • <i>ESO Terra Investment Limited shall put in place an Occupational Health and Safety Management Plan for the project.</i> • <i>ESO Terra Investment Limited shall put in place a Waste Management Plan for the project.</i> • <i>ESO Terra Investment Limited shall fully implement the Environmental Management Plan (EMP) for the project.</i> • <i>ESO Terra Investment Limited shall ensure continuous consultation with the project's host communities, relevant regulatory authorities and other stakeholders throughout the project's lifespan.</i> 	

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<ul style="list-style-type: none"> • ESO Terra Investment Limited shall prepare annual sustainability reports, using the Global Reporting Initiative (GRI) Guidelines. The report shall be submitted to the Environment Assessment Department of the Federal Ministry of Environment. • The Federal Ministry of Environment in collaboration with other relevant Regulatory authorities shall carry out EIA Impact Mitigation Monitoring (IMM), Environmental Audits (EAu) and Compliance Monitoring exercises on the project. • There shall be an Environmental Management System (EMS) for the project. <p>Findings indicate that the majority of the EIA approval conditions listed above are yet to be actioned and implemented. A systematic procedure or action plan for addressing the conditions for EIA approval is not in place.</p>	
Organisational Capacity and Competency, Contractual Management	<p>The internal capacity to ensure effective E&S management is considered appropriate, with sufficient well-experienced resources in place. The SHEQ Manager and E&S Manager have combined relevant experience of over 30 years. A Deputy E&S Manager joined the team recently (February 2024).</p> <p>Each sub-unit of the SHEQ department maintains an annual training programme for capacity building of personnel and the general workforce. The Contractor's SHEQ organogram is presented in Annex A.</p> <p>The current numbers and ratios for E&S supervision to project activities are considered adequate. However, the Contractor agreed that further expansion of the E&S management team is required as the project progresses, especially in the area of field (work front) supervision and monitoring. A formal E&S staffing plan is yet to be developed.</p> <p>E&S aspects for construction sub-contractors are managed through the Project Quality Plan. These include:</p> <ul style="list-style-type: none"> • Approval of the sub-contractor's SHEQ management plan; 	<ol style="list-style-type: none"> 1. E&S organogram (SHEQ)_REV1 2. Project quality plan

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<ul style="list-style-type: none"> • Inclusion of relevant SHEQ clauses in the contract; • Medical examination and fitness certification; • Inventory of tools and equipment accepted by the Engineering and SHEQ departments; • Verification of competency for equipment operators and mechanics; • Security clearance; • Qualified responsible person for overseeing safety; and • SHEQ risk assessment and monitoring. 	
Emergency Preparedness and Response	<p>A Project emergency and preparedness plan (EPP) is in place including designated roles and responsibilities for implementation and supervision. Existing procedures include emergency preparedness, general evacuation and response training, emergency levels, transfer services to referral hospitals, international evacuation, and evacuation drills. Sub-documents maintained based on the EPP include:</p> <ul style="list-style-type: none"> • Emergency contact details; • A Flow chart procedure in case of accidents; • A general evacuation response procedure – flow chart; • Emergency assembly point locations; and • Mock drill reports. <p>The EPP stipulates the requirement for at least one emergency evacuation drill annually and the most recent emergency response drill at the Kazaure camp site and production facility was conducted on 16 November 2023. According to the emergency drill report, 11 issues were identified with corresponding recommendations for improvement.</p>	<ol style="list-style-type: none"> 1. 0_Emergency and preparedness plan rev.01_pre 2. 1_Emergency contacts rev.01_pre 3. 2_Emergency plan – fluxogram rev.01_pre 4. 2.1 Response preparedness rev.01_pre 5. 3.1 Assembly emergency point location_Kazaure 6. 4_Mock-drill-report-16-11-2023 7. ME Health and safety KPIs-2023

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>The frequency of conducting emergency mock drills (once annually) does not meet good international industry practice which requires at least bi-annual emergency mock drills. In addition, emergency preparedness and response associated with the quarries is not included in the project EPP.</p> <p><i>'In a workplace with serious fire hazards (for example, flammable materials or difficult egress as in high rise buildings), fire drills should be conducted at least once every 3 months. In other workplaces every 6 months may be adequate.'</i> – EHS Daily Advisor</p> <p>No records of any environmental incidents have been recorded on the project in the last two years. The Contractor recorded four medical treatment cases in 2023 with no lost time injuries (LTI) recorded, while five LTI cases (one in January and four in February) have been recorded so far in 2024.</p> <p>Emergency response and early detection equipment like portable fire extinguishers and fire alarm systems are in place and serviceable at the campsite and quarry. Portable fire extinguishers are also provided at active worksites along the railway route.</p>	<p>8. ME Health and safety KPIs-2024</p>
<p>Monitoring and Reviews AfDB OS9: Financial Intermediaries</p>	<p>Management reviews are conducted annually in line with MEECA's EMS requirements as part of its Market Internal Audit (MIA). The most recent MIA for the project was conducted between 4-7 December 2023 and covered elements of ISO 9001, 14001, 45001, legal and contractual requirements.</p> <p>External monitoring and review such as impact mitigation monitoring (IMM) is conducted by the national environment regulator, FMEnv, in collaboration with the various State offices. So far, no IMM has been conducted on the project.</p>	<ol style="list-style-type: none"> 1. ME SHEQ Internal Audit Report NIGERIA _2023 (1) 2. Sustainability audit diagnosis checklist
<p>Stakeholder Engagement AfDB (OS10): Stakeholder Engagement</p>	<p>The Contractor has developed a stakeholder engagement plan (SEP) based on the SCSP. The aim of the plan is <i>'...to ensure that a consistent, comprehensive and coordinated</i></p>	<ol style="list-style-type: none"> 1. Stakeholder engagement plan

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
and Information Disclosure	<p><i>approach is taken to stakeholder engagement and project disclosure throughout the project construction phase.'</i></p> <p>Key elements of the SEP include:</p> <ul style="list-style-type: none"> • Stakeholder identification; • Stakeholder engagement strategy; • Roles and responsibilities; • External grievance mechanism; and • Monitoring, evaluation and reporting. <p>Documents and records to be kept based on the SEP include:</p> <ul style="list-style-type: none"> • Stakeholder register; • Meeting minutes; • Attendance list; and • Grievance register. <p>Although the Contractor has identified and periodically engages with some stakeholders, including government regulators (national, state, local), and project-affected communities (PACs), a comprehensive and well-structured stakeholder register that will ensure engagements meet planned objectives in the most effective ways is not in place.</p>	<ol style="list-style-type: none"> 2. Social and community sustainability plan
External Communications and Grievance Mechanism	<p>The Contractor's SEP provides an overview of communication management between the company and its stakeholders. A Community Liaison Officer (CLO) has been appointed as a primary link between the Contractor and external stakeholders. It is noted that the project</p>	<ol style="list-style-type: none"> 1. Stakeholder engagement plan 2. Grievance management procedure

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
<p>AfDB (OS10): Stakeholder Engagement and Information Disclosure</p>	<p>has a high number of PAPs in the Project Area of Influence, especially in urban areas such as Katsina Station.</p> <p>Section 8 of the SEP states as follows... <i>'In line with GIIP and to ensure that all grievances that may arise over the course of the project are resolved as quickly as possible, a CGM is required and will be developed and implemented by the Project.'</i></p> <p>Although a CGM (company-community grievance mechanism) is not in place, a grievance redress management (GRM) procedure (has been established by the Contractor. The procedure outlined in the GRM involves:</p> <ul style="list-style-type: none"> • Lodging a grievance; • Acknowledgement and recording of grievances; • Assessing grievances; • Investigations; • Responding; • Mediation; and • Close-out. <p>Furthermore, reporting, document control and data management, monitoring and review are key elements of the GRM.</p> <p>A log of external grievances was sighted by the EnvAccord team during the site visit. Some of the issues captured in the register are related to payment of compensation for land, ESIA/RAP issues, access road compensation, etc. Feedback from our engagement with some PAC members indicated that many PAPs are not aware of the grievance procedure or existing channels for reporting complaints. In addition, an anonymous means of providing feedback or reporting grievances has not been provided for the project.</p>	<p>3. Grievance log (sighted during site visit)</p>

PS1 / OS1 Requirements and Guiding Questions	Current Status	Documents Reviewed
<p>Ongoing Reporting to Affected Communities</p> <p>AfDB (OS10): Stakeholder Engagement and Information Disclosure</p>	<p>External reporting is addressed in the SEP (sub-section 8.4).</p> <p><i>'MENG will keep track of commitments made (through the meeting minutes) and will communicate progress made against these commitments on a regular basis (for instance during regular meetings with the community representatives).'</i></p> <p>This provision in the SEP addresses feedback to communities on reported issues or commitments but does not provide information on relevant E&S indicators or project impacts, management and performance. In addition, the frequency of reporting is not stipulated.</p>	<p>1. Stakeholder engagement plan</p>

5.2.2 IFC PS2 – LABOUR AND WORKING CONDITIONS; AFDB OS 2 (OS2): LABOUR AND WORKING CONDITIONS

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

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

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

PS2 / OS2 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>The sample contract letter for local employees contains basic information, job title, grade and duration, remuneration benefits, employee responsibilities, employer's undertakings, working hours, leave and absences, payroll deductions and pensions, termination of employment, dispute resolution, etc. They also work for 45 hours between Monday and Saturday (5 hours_Based on Saturdays) but may be_overtime requirements, workers are occasionally required to work additional hours as may be necessary to meet deadlines. Any work exceeding 45 hours per week or performed on non-but working days is considered overtime and is compensated. Employees who are unable to put in extra hours of work require the permission of relevant Supervisor to not work the overtime. is not mandatory, and employees can choose not to work on these days.</p> <p>Regarding the 2X challenge, the proportion of women in the leadership position in the Nigerian office is low, and is the same for the entire workforce. Globally, only between 5-10% of women are in top management positions. Of the 1,495 full time employees of the Contractor, 56 are females, which is understood to be more because of cultural inhibitions and the industry sector rather than a deliberate policy of discrimination.</p>	
Organisational Capacity	<p>The Lagos HR unit at the project site is headed by a Human Resources Representative who reports to the Group HR Manager in Portugal (Ms Sandra Bento). The Lagos-based HR Manager is assisted by a HR Technician and a few other staff. The HR unit coordinates local recruitment processes and personnel issues while consulting with the Lagos office. The Contractor has regular training programmes for its internal staff; there are also periodic awareness and targeted trainings for other staff of the Contractor as well as third party workers. In terms of adequacy of staff, it was observed that for the present stage of the project, the number of staff on the ground is adequate, but the Contractor acknowledged that there will be need to hire additional staff as more sections of the project come on-board.</p>	<ol style="list-style-type: none"> 1. Contractor HR Global Policy-Think Global 2. Act Local; 3. -Employee Handbook: Contractor (Nigeria); and 4. -SERVICE ORDER: Human Resources Global Policy.

PS2 / OS2 Requirements and Guiding Questions	Current Status	Documents Reviewed
Worker Grievance Mechanism	<p>A grievance procedure is documented in the employee handbook including process and feedback timelines. The Contractor maintains a grievance register; however, no formal complaints have been logged in the register. Contractor reports that most grievances are resolved informally and are not logged in the grievance register. In addition, the Social and Community Sustainability Plan spells out clearly the procedure for internal grievance redress at the local level. However, discussions with workers revealed that the procedures are poorly understood; and that the procedure does not allow for anonymity.</p>	<ol style="list-style-type: none"> 1. -Contractor's Grievance Management Procedure-Kano-Maradi Single Track Standard Gauge railway Line 10001 NIG. KAMA-MENG -SU PRO 000859 REV 00 23/02/23; 2. Grievance Register HR Kano Project (Template) 3. Employee Handbook: Contractor (Nigeria); 4. SERVICE ORDER: Human Resources Global Policy; and 5. Social and Community Sustainability Plan.
Working Conditions	<p>The Contractor's staff work for 10 hours five days per week (Monday to Friday) and shorter time on Saturdays and Sundays. The official working hours on the site are as follows (including overtime, as required):</p> <ul style="list-style-type: none"> • Monday to Friday (8 am – 5 pm) and total of nine hours per day. • Saturday (8 am – 1 pm) and total of 5 hours per day. • Sunday (8 am -12 pm) and limited to only two Sundays per month. <p>Work on Saturdays and Sundays is considered over time, but not mandatory overtime and is optional for all workers. Renumeration for over time is also paid for work concluded after 5 pm for weekdays based on employees' basic salaries. The salary for the average worker is three times the national minimum wage.</p>	<ol style="list-style-type: none"> 1. Contractor HR Global Policy-Think Global 2. Employee Handbook: Contractor (Nigeria); 3. SERVICE ORDER: Human Resources Global Policy; 4. Social and Community Sustainability Plan; 5. Employment Contract Template (Expatriates)

PS2 / OS2 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>Terms of Employment. New recruits fill admission forms or pre-agreement forms upon being hired and receive a formal letter of appointment three months or longer after appointment. This was confirmed through interviews with workers on the site. The Contractor has taken steps to ensure that contract letters are duly provided to all relevant employees.</p> <p>The sample contract letter for local employees contains basic information, job title, grade and duration, remuneration benefits, employee responsibilities, employer’s undertakings, working hours, leave and absences, payroll deductions and pensions, termination of employment, dispute resolution, one-hour lunch break, etc.</p> <p>Benefits: Most of the Contractor’s workers are covered by the Contractor policy. They also have access to free medical services at the Contractor’s camp medical facilities and are enrolled with the contributory pension scheme of the Federal Government. Additional information and documentation from the Contractor indicated that the workers are covered under the Nigerian Social Insurance Trust Fund (NSITF) scheme, which is a statutory requirement for all full-time workers in Nigeria.</p> <p>There is a dedicated staff canteen for expatriate workers and a few Nigerian workers whose job descriptions make it difficult for them to observe regular break hours (such as canteen workers). The remaining workforce receives a daily food allowance fee, and they are allowed to source their own food.</p> <p>The accommodation facilities have water and toilet facilities and recreational spaces. There is provision for transportation to convey staff to and from work. There are mobile toilet facilities and drinking water points for workers at the camp site as well as a place for Muslim prayers. Recreational facilities at the camp site include a swimming pool, volleyball court and tennis court, some of which are still under construction.</p>	<ol style="list-style-type: none"> 6. Contractor Nigeria Employment Contract (locals); and 7. Kano-Maradi ESIA Preliminary Early works on ESMP (Dawanau to Kazaure Section).

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

PS2 / OS2 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>subcontractor and one of their staff members and was handled internally at member. Subsequent to the site level to avoid escalation. Additional information from the Contractor indicated that steps are being taken to create more awareness about GBV and reporting lines, and to ensure that Sub-of this incident, all sub-contractors provide were required to undergo mandatory anti-harassment training on sexual harassment and provide proof of training for their employees staff.</p>	<ol style="list-style-type: none"> 3. Contractor Harassment and Discrimination Policy; and 4. Contractor Gender report - Year End 2023 Summary.
Non-Discrimination	<p>The Contractor has a corporate policy of non-discrimination which extends to persons with disability. The Contractor has ~36 female employees, a few of them in senior positions. The staff strength reflects people of diverse nationalities, ethnicities, religions, and gender.</p>	<ol style="list-style-type: none"> 1. Human Resources Policy; 2. Employee Handbook; 3. ESIA Impact Assessment Chapter; and 4. Contractor Gender Equality Plan 2024.
Worker Organisations	<p>Interviews with management and workers of the Contractor noted that there is no two unions are active union for their representation. The Contractor reported that discussions are currently on-going with the National Union of Civil Engineering Construction, Furniture, and Wood Workers, the relevant union for the employees. These discussions will hopefully culminate in the establishment of a local branch of the union once the project and workers are concluded. Free to join and associate with the union of their choice.</p>	<ol style="list-style-type: none"> 1. Contractor Human Resources Policy; and 2. Contractor Employee Handbook.
Contractor Management	<p>There are currently 15 sub-contractors on site employed directly by the Contractor as the EPC. There is a corporate-level policy and guidelines for appointment of sub-contractors. The appointed sub-contractors are identified based on the technical and statutory requirement and past performance records. The contracts with these sub-contractors contain environmental and social clauses.</p>	<ol style="list-style-type: none"> 1. ESIA Preliminary Early works on ESMP (Dawanau to Kazaure Section); 2. Contractor management procedure; and 3. Contractors' daily report.

PS2 / OS2 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>The Contractor also monitors the activities of sub-contractors to ensure compliance with ESMP, labour laws regarding child labour, forced labour and non-discriminatory practices. The sub-contractors submit daily reports of their activities to the Contractor (copies were reviewed during the sit visit). Some sub-contractors did not have their own distinct ESMP and relied on the main Contractor's ESMP, with a few reports of breaches and non-compliance with safety standards. Breaches were mostly related to compliance with use of PPE, especially hard hats.</p> <p>Copies of the sub-contractors' agreement were not available for review but oral interviews with some of the sub-contractors indicated that the agreement contains details of safety expectations, and that the Contractor conducts routine inspections and monitoring. The Contractor also provides routine H&S training for third-party workers.</p>	

5.2.3 IFC PS3 – RESOURCE EFFICIENCY AND POLLUTION; AFDB OS 3 (OS3): RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT

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

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

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

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

5.2.4 IFC PS4 – COMMUNITY HEALTH, SAFETY AND SECURITY; AFDB OS 4 (OS4): COMMUNITY HEALTH, SAFETY AND SECURITY

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

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

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

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

5.2.5 IFC PS5 – LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT; AFDB OS 5 (OS5): LAND ACQUISITION, RESTRICTIONS ON ACCESS TO LAND AND LAND USE, AND INVOLUNTARY RESETTLEMENT

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

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

PS5/ OS5/OS7/OS10 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>approximately 91 stakeholder engagement meetings were conducted, with an additional 17 meetings held as of 2024 involving the communities.</p>	
<p>Grievance Management (OS10): Stakeholder Engagement and Information Disclosure</p>	<p>The RAP/LRP documents clearly outline the grievance redress mechanism and institutional roles and responsibilities. It further advocates for the establishment of grievance redress committee.</p> <p>The FMoT manages all grievances related to land acquisition and compensation, whilst the Contractor records and manages construction related grievances.</p> <p>Interactions with the communities during the field activities indicated that the communities were aware of the project and were involved in the land acquisition processes. There were, however, conflicting views about the existence of any Grievance Redress Committee. While the Contractor, FMoT and a few stakeholders reported that this exists, many PAPs claimed ignorance of the committee and channels for lodging land acquisition and compensation grievances. Some traditional leaders have been receiving a significant number of grievances from PAPs and they are unsure of where to direct the received grievances.</p> <p>As of 2023, the Contractor documented 11 grievances, of which four had been resolved at the time of the site visit, while seven were pending resolution. Most of the grievances pertained to construction activities such as blasting, borrow pit backfill, excessive dust emission, soil dumped on agricultural land, embankment on graveyards, compensation for road damage, among others.</p> <p>Overall, the implementation of the grievance redress mechanism by FMoT is lacking and it appears that there are no grievance officers from government that have been deployed to PACs.</p>	<ol style="list-style-type: none"> 1. Grievance Register 2023 2. Grievance Register 2024 3. Grievance Management Procedure 4. Kano-Maradi Final RAP Section 1 and Supplementary RAP

PS5/ OS5/OS7/OS10 Requirements and Guiding Questions	Current Status	Documents Reviewed
Resettlement and Livelihood Restoration Planning and Implementation	<p>A zone lotting approach will be adopted for the project implementation and the route has been broken into nine sections. Two resettlement plans have been provided for the ESDD; i.e., the Draft Supplementary RAP/LRP, February 2024, which includes the entire railway line (393km), and the RAP/LRP for Section 1 of the route (Kano to Dawanau) in Nigeria, July 2022.</p> <p>As it stands, it is unclear which RAP/LRP is being implemented in Nigeria whereby PAPs in six sections of the route have been paid compensation.</p> <p>Notable observations:</p> <p>Overall, both RAP/LRP documents indicate that they seek to align with good international industry practice standards (GIIP); however, both documents mostly do not follow these standards, particularly in application of the most stringent provisions between national legislation and GIIP.</p> <p>The Section 1 RAP/LRP was adapted into the Supplementary RAP/LRP document, which is evident when reviewing the Chapters 7 compensation framework, eligibility, and entitlements. For instance, Section 7.4 on the establishment of a cut-off date states that the cut-off date was widely publicised via television- Nigerian Television Authority (NTA), radio (Liberty Radio 103.3 FM), and communicated with traditional leaders in project affected communities (PACs). However, the television and radio broadcasters are found in Nigeria and not in Niger. Therefore, there is no evidence of the establishment of the cut-off date to PACs and PAPs in Niger.</p> <p>Section 7.5 Project Approach to compensation states that cash compensation for impacted assets is calculated in the local currency, "Naira ₦ or NGN" for Nigeria, and "West African CFA Franc" for Niger, taking into consideration inflation rates given the economic contexts in both Niger and Nigeria. However, in Chapter 11: Implementation Arrangements and Budget, the currency used for all costings is presented in Naira.</p>	<ol style="list-style-type: none"> 1. Kano-Maradi Final RAP Section 1 and Supplementary RAP

PS5/ OS5/OS7/OS10 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>Other findings:</p> <p>The RAP/LRP documents do not mention provision of replacement land. The RAP is also silent on how cases of PAPs who lose >50% or more land will be assisted.</p> <p>In the legal framework gap analysis, some of the project’s strategies to address legislative gaps are vague and do not speak to the relevant sections of the RAP/LRP document such those related to the LRP – the project’s strategy to bridge the legislative gap states “Livelihood restoration measures will be put in place for vulnerable persons”. This statement is the opposite of the details provided in the LRP chapter whereby all PAPs whose livelihoods are disturbed by the project will participate in the LRP and not just vulnerable persons. As such, alignment of the different sections of the RAP/LRP documents is required.</p> <p>Both RAP/LRP documents present implementation schedules, however, the timelines provided are unrealistic considering that the land acquisition process will be completed in sections; therefore, this should be reflected in the schedule. It does not make provisions for the period land evacuations, timing when PAPs will be allowed harvest standing crops, implementation of the LRP, compliance monitoring review, among others.</p> <p>Due to the land acquisition process being undertaken in compliance with national standards, i.e., Land Use Act, no provisions have been made in the RAP/LRP documents for replacement land, host communities, considerations for PAPs who lose 50% or more of their land, vulnerable persons, among others.</p>	
Physical Displacement	The RAP/LRP is silent on loss of access to land, but it focuses on the loss of structures, crops, and trees. This is a major gap in the documents as it cannot be clearly determined whether some PAPs did lose 100% of their occupied land or 10%, and how the different percentages lost will be compensated for and if there are venerable persons among such PAPs, etc. Also, the RAP/LRP report is silent on the availability of land for PAPs to	1. Kano-Maradi Final RAP Section 1 and Supplementary RAP

PS5/ OS5/OS7/OS10 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>purchase, the market conditions for purchasing land and construction. Even though land losses are not included in the RAP/LRP documents, this is likely to occur especially in areas where the railway stations will be constructed.</p> <p>The Project will result in the loss of 12,695 houses and 2,064 losses of complementary assets. The house losses apply to sections 1,2,3,4,5 and 9 (the valuations for sections 7 and 8 are still ongoing). Information from the site visits did not indicate physical resettlement for the sections already covered. However, it is uncertain if the remaining sections (i.e. 6 and 7) will involve physical resettlement as asset valuations are still ongoing.</p>	
Economic Displacement	<p>Economic displacement impacts will be significant along the extent of the route. Payment of cash compensation for the loss of improvements on the land has been paid for sections 2,3,4,5, and 9 of the Project, while only partly paid for section 8, and there is significant dissatisfaction with the compensation received. No compensation has been paid for section 1, and asset valuation for sections 6 and 7 is still ongoing.</p> <p>The Supplementary RAP Report indicates that 19,238 persons will be economically displaced.</p> <p>The RAP/LRP for Niger is still in progress and the RAP/LRP implementation in Nigeria is underway with a focus on payment of compensation to PAPs.</p>	<ol style="list-style-type: none"> 1. Kano-Maradi Final RAP Section 1 and Supplementary RAP
Vulnerability (OS7): Vulnerable Groups	<p>The RAP/LRP documents identify vulnerable persons in a more generic manner (female headed households, aged and elderly persons, low-income households, orphans, people living with disabilities, people living with ill-health, indigent households, households with large numbers of dependents and households headed by people living with disability) and does not consider multi-dimensional vulnerabilities of PAPs. Considering the misalignment</p>	<ol style="list-style-type: none"> 1. Kano-Maradi Final RAP Section 1 and Supplementary RAP

PS5/ OS5/OS7/OS10 Requirements and Guiding Questions	Current Status	Documents Reviewed
	of the RAP/LRP with international standards, the project is likely to result in more PAPs being vulnerable.	
Private Sector Responsibilities under Government Managed Resettlement	Discussions with the project Contractor revealed that all land acquisition and resettlement related matters are the sole responsibility of the FMoT, a government ministry.	1. Kano-Maradi Final RAP Section 1 and Supplementary RAP

5.2.6 IFC PS6 – BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES; AFDB OS 6 (OS6): HABITAT AND BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

PS6 /OS6 Requirements and Guiding Questions	Current Status	Documents Reviewed
Protection and Conservation of Biodiversity (General)	<p>Two main habitat types have been recorded, being tropical grassland and shrubland, which are components of the West Sudanian savannah. It has been noted in the baseline that “significant degradation of the habitats in and around the Project AoI have been caused by the conversion of land to agriculture, the grazing of livestock, deforestation and charcoal production”.</p> <p>Overall, the impacts are well assessed, with habitat fragmentation, loss of individuals of threatened tree species and potential continued degradation of adjacent habitats the key concerns, but with mitigation proposed, residual impacts can be significantly reduced.</p> <p><u>Notes on the ESIA:</u></p> <p>It has been noted that the biodiversity sampling protocol in Niger followed a pre-determined distance rather than the targeting of specific habitats as done for Nigeria. Further, in Niger only a dry-season survey could be conducted. Whilst in Nigeria only a wet-season survey was done. Overall, thus, it can be accepted that current knowledge on biodiversity in Niger is somewhat under-represented.</p> <ul style="list-style-type: none"> ◦ The above has been taken into consideration in the BMP with the pre-clearance checklist to be completed. <p>Whilst two habitat types have been described on a very high level, it is clear that there are also wetland and riparian habitats associated with ephemeral, seasonal and perennial drainage lines/rivers (about 80 being crossed by the rail) and ponds. Several of these wetland habitats are delineated as forest reserves, showing their ecological and ecosystem services importance within the wider semi-arid region.</p> <ul style="list-style-type: none"> ◦ These habitats are merely described as ‘aquatic habitats’, mapped in the Technical Annex F: Water Resources, but no further information on species typically 	<ol style="list-style-type: none"> 1. III.B.4 route screening update 2. 2023_Kano_Maradi_ESIA Report (Final): 03 Project Description 3. Final ESIA Technical Annex F: Water Resources 4. Final ESIA Technical Annex G: Biodiversity 5. Biodiversity management plan 6. SKonica Min24032111370 7. SKonica Min24032111380 8. SKonica Min24032111401

PS6 /OS6 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>associated with such – especially in their more natural state – was provided. Except the mapping of rivers, no delineation of mapping of the extent of associated floodplain wetlands has been provided/undertaken. Although such wetlands are mostly modified to cultivated lands, recognising and maintaining their ecosystem functionality by sufficient drainage (subsurface or other) will be important to retain their current agronomic productivity.</p> <p>Plant species reported on in the biodiversity baseline are limited to common and threatened species, of which most are trees. However, in the Project description as well as the rehabilitation plan, the use of vegetated swales on all embankments, lining stormwater drains is indicated, using a mixture of native grasses.</p> <ul style="list-style-type: none"> ◦ Although the herbaceous and geophytic component of the vegetation may vary interannually due to timing and amount of rainfall, a full list of plant species for the various habitats needs to be provided to be able to set goals for rehabilitation and to monitor no net loss measure implemented (as discussed later in this section). ◦ It is not clear if a vegetation cover will be used for the long-term stabilisation of sloped embankments and transition zones under bridges), but it would be advisable to seek another alternative to stabilise slopes under bridges, as native grasses are adapted to a high-light environment and are anticipated to perform poorly under more shaded conditions under the bridges. <p>Following information contained in the route screening and with the RAP not yet finalised, it is noted that potentially 1844 ha of replacement farmland will be required, with an additional 115 ha for replacement settlements. No information has been provided on where this 'replacement land' will be, and thus RAP-associated impacts on biodiversity (and ecosystem services) could not and were not yet assessed.</p> <p>As documented in the impact assessment 'The occasional presence of the baobab, <i>Adansonia digitata</i> has been noted. Within the prevailing environment and elevated by the</p>	

PS6 /OS6 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>large extent of modification/degradation of natural habitats, undoubtedly would be a keystone species⁴, and clearance of such trees, as well as the reduction of seasonal runoff that keeps these trees alive would need to be avoided at all costs.’</p> <ul style="list-style-type: none"> ◦ Site visit observations revealed that the baobab, <i>Adansonia digitata</i> is highly abundant and widespread across the project States, including along the direct project footprint. ◦ Its abundance and versatility (for medicines, fiber and other non-timber uses) make it an invaluable asset to tribes not only in northern Nigeria but throughout Africa. The conservation status of this species remains undetermined, as it is yet to be evaluated against the International Union of Conservation of Nature (IUCN) Red List criteria. The BMP and biodiversity baseline only acknowledges the importance of these trees as potential vulture roosting/breeding sites and as such advises on avoiding work near such trees, but does not expressly recognize its wider importance and need to retain these trees. <p>Following the initial and supplemental ESIA, ESMPs, a biodiversity management plan (BMP) has been developed. The Contractor needs to conduct a biodiversity risk analysis and control assessment based on the biodiversity plan using a mitigation measure checklist.</p> <p><u>Notes on the BMP:</u></p> <p>The BMP cross-references other management plans such as the waste-water-, soil and spill-response plan. However, those management plans show no linkage/cross-reference to the BMP, which is of most significant concern for potential spills of hydrocarbons or other significant pollutants.</p>	

⁴ Keystone species are those species whose importance to an ecosystem’s structure, composition, and function is disproportionately large relative to their abundance. These species can be of any life form, but they have in common an effect on their environment that is always greater than what can be expected based on their biomass (source: <https://www.oxfordreference.com/>)

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

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

PS6 /OS6 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>continued free movement of water across the rail servitude and associated access roads to retain natural replenishment of water resources.</p> <p>According to the BMP and amplified in the Project description, design principles and placement of bridges over rivers, as well as pipe and box culverts follow best practice, with bridges spanning the width of rivers, whilst box- and pipe culverts are said to be fitted with downstream flood and erosion protection, either with rip-rap outlet protection immediately downstream of the concrete apron, or supplemented by dissipators or reno mattresses.</p> <p>It has been noted in the Project Design (Table 3-14) that it is recommended that felled vegetation will be discarded to landfills. This is contradictory to the soil management plan and BMP, where it is recommended that felled vegetation, especially wood, be used for erosion control or donated to communities for firewood. The latter would be the preferred option, and ever cleared herbaceous or shrubby vegetation can be applied as mulch at construction areas to prevent soil erosion, suppress dust, create temporary faunal barriers and be used to facilitate revegetation, rather than filling up landfills. This slight inconsistency can be updated.</p> <p>As indicated in the above section, the only risk to ecosystem services will be poor re-instatement of riparian areas and poor performance of no-net-loss measures. With the current lack of more detail on natural species compositions of such habitats, progress towards rehabilitation and no-net-loss by enhancement of degraded areas cannot be measured.</p>	
Protection and Conservation of Biodiversity (Modified, Natural, and Critical Habitats)	A 2021 land acquisition and biodiversity risk screening study of the project reports that the current railway route will directly impact seven forest reserves and could indirectly impact 10 other forest reserves in Nigeria.	1. MEA Nigeria KM railway land and biodiversity route screening updated 24052021

PS6 /OS6 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>The study further submits that the potential that Critical Habitat (CH) would be triggered is considered medium and that risks and impacts to biodiversity are expected to be managed through standard mitigation measures.</p> <p>The only species for which potential CH has been indicated on a precautionary principle is the Endangered and Endemic African Spurred Tortoise (<i>Centrochelys sulcata</i>). No information is provided on the preferred habitat of this species (except that riparian habitat may be suitable), nor preferred food plants for this species, which is further complicated by the apparent lack of detailed lists of vegetation composition, which makes it difficult to determine, predict or map potential preferential habitats other than the approximate modelled distribution of this species as derived from IBAT. Further, the BMP does not make specific mention of or monitoring for this species, other than indicating the need for a pre-construction survey and relocation where necessary, as well as prohibiting bushmeat collection by staff. Whilst drainage structures should be sufficient to facilitate the movement of this species across the rail, prioritising opportunistic sightings of this and other threatened fauna species together with locality for more detailed habitat investigations could contribute to more meaningful and measurable no-net-loss activities.</p> <p>As indicated in above section, without more detailed information on actual species composition and species to be used for rehabilitation and no-net-loss activities, the efficiency of conservation actions over time cannot be verified.</p>	<ol style="list-style-type: none"> 2. 2023_Kano_Maradi_ESIA Report (Final): 07 Baseline Summary 3. Final ESIA Technical Annex G: Biodiversity 4. Biodiversity management plan
Protection and Conservation of Biodiversity (Protected Areas)	<p>As indicated above, several forest reserves will be directly and more potentially indirectly impacted. A summary of identified forest reserves along the project route is presented in Technical Annex G (Table G3-1). These are mapped in the water resources report (Annex F). Important to note is that the railway line will directly cross the following forest reserves:</p>	<ol style="list-style-type: none"> 1. 20240313 NIG_KAMA_FM_2024_1498 - Forest Reserves Affected by the Project 2. Final ESIA Technical Annex F: Water Resources

PS6 /OS6 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>Dutsin Kuba just east of Tsamga. This reserve is largely modified to cultivated fields, but the rail cuts through a section of disturbed woodland.</p> <p>Nasarawa north-west of Katsina, which appears 100% modified to cultivated land;</p> <p>Damangu west of Mashi, of which about half of the impacted area appears cultivated.</p> <p>Daura west of Gurjiya, where smaller apparent natural but disturbed habitats will be impacted;</p> <p>Gwiwa Korel, of which the eastern fringe will be severed. However, in this case the rail may form a barrier to further urban encroachment into the woodlands more prevalent west of the rail alignment;</p> <p>Gasartani west of Galoru – most of this reserve is modified, but is part of a historical floodplain wetland; and</p> <p>Shakwadina west of Duru – although almost 100% cultivated, also part of a historical floodplain wetland.</p> <p>It must be noted that most of these 'forest reserves' have been modified to cultivated lands, likely due to seasonal moisture accumulation in these areas. Most of these forest reserves are also linked to and/or cover variable extents of seasonal or perennial wetland features. The latter has not been explored/detailed further for the forest reserves directly impacted by the railway.</p> <p>The Contractor has requested (via letters dated 23 February 2022, 8 March 2022, and 13 March 2024) the status of reserve areas and requirements from the national regulators. However, the regulator has yet to respond to inquiries, but this could also be done by a suitably qualified specialist. The most important feature to determine will be the wetland characteristic of the affected forest reserves and ensuring that beyond the bridges across the visible rivers, sufficient additional culvert and/or subsurface drainage is installed spanning the entire wetland width to ensure that subsurface or seasonal flooding across such wetlands are not impeded, as this will also significantly impact cultivation within such</p>	<ol style="list-style-type: none"> 3. Final ESIA Technical Annex G: Biodiversity 4. NIG.KAMA.AG.2022.262 - FMoE Forest reserve annex 5. NIG.KAMA.AG.2022.252 FmoT FMoE Forest reserve grave sites 6. Biodiversity management plan

PS6 /OS6 Requirements and Guiding Questions	Current Status	Documents Reviewed
	<p>areas. One example where this is important is drainage required in regular distances across the entire width of the Shakwadina Forest Reserve.</p> <p>Together with local leaders, authorities and possibly NGOs, such information can be used to formulate more detailed practical, measurable and long-term sustainable no-net-loss activities (as indicated in above sections).</p>	
Protection and Conservation of Biodiversity (Invasive Species)	<p>The introduction and spread of alien invasive species during project construction phase has been assessed in the ESIA and classified as minor to negligible residual significance. The risks and impacts are expected to be managed through standard mitigation measures.</p> <p>The BMP contains a sufficiently detailed section on the control of alien invasive species, which also allows for the use of herbicide if needed. As noted under PS3, if herbicides will be used, this will require a pesticide control plan.</p> <p>It is further noted that the use of fire for controlling some species has been mentioned – however, as this could pose a risk of uncontrolled fires, the practicability of this needs to be evaluated and then clearly linked to a fire-response protocol in the emergency preparedness procedure.</p>	<ol style="list-style-type: none"> 1. V.A. 1.1 1620011906-RAM-RP-IA-00039_Chp08_Impact Assessment1 2. Biodiversity management plan

5.2.7 IFC PS7 – INDIGENOUS PEOPLE; AFDB (OS7): VULNERABLE GROUPS

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

5.2.8 IFC PS8 – CULTURAL HERITAGE; AFDB (OS8): CULTURAL HERITAGE

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

6. ENVIRONMENTAL AND SOCIAL ACTION PLAN

This section summarises the specific actions to be completed to comply with the requirements of the Applicable Standards (Table 6-1). Actions are specified where:

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

TABLE 6-1 ENVIRONMENTAL AND SOCIAL ACTION PLAN

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

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

Index	Finding / Deficiency	Risk Ranking	Action Items / Recommendations	Completion Indicator	Responsibility	Completion Timeframe
PS1/OS 1-08	<p>Monitoring and reporting</p> <p>External reporting is addressed in the SEP (sub-section 8.4).</p> <p><i>'MENG will keep track of commitments made (through the meeting minute) and will communicate progress made against these commitments on a regular basis (for instance during regular meetings with the community representatives).'</i></p> <p>This provision in the SEP addresses feedback to communities on reported issues or commitments but does not provide information on relevant E&S indicators or project impacts, management and performance. In addition, the frequency of reporting is not stipulated</p>	Moderate	<ul style="list-style-type: none"> The Contractor should establish a structured reporting framework that includes relevant E&S indicators, project impacts, management, and performance. This framework should provide clear guidelines on what information needs to be reported, how it should be measured, and the frequency of reporting. This will ensure that stakeholders are informed about the project's progress and its environmental and social performance. The Contractor should ensure that the reports include information on key E&S indicators, such as environmental impact assessments, social impact assessments, and any other relevant metrics. This will provide stakeholders with a clear understanding of the project's environmental and social performance and help them assess its overall sustainability. The Contractor should define a specific reporting frequency, such as monthly, quarterly, or bi-annually, to ensure regular and consistent reporting. This will enable stakeholders to stay informed about the project's progress and address any concerns or issues in a timely manner. The reporting schedule should be communicated to all relevant stakeholders to set clear expectations. In addition, the Contractor should consider using a variety of channels to disseminate the reports effectively, i.e., electronic, stakeholder engagement meetings, etc. 	Updated Stakeholder Engagement Plan (including an E&S reporting framework)	Mota Engil	Within 3 Months of 1 st drawdown
PS3/OS 3-01	<p>Sewage waste</p> <p>Sewage and liquid sanitary wastewater are channelled into septic tanks and disposed of by a third-party vendor for disposal. The Contractor is yet to determine the accreditation status, competence and capacity of the sewage management vendor.</p>	Moderate	<ul style="list-style-type: none"> Develop a vendor evaluation process to establish a systematic process for evaluating and monitoring the performance of the sewage management vendor. This may include regular inspections, audits or performance reviews to ensure that the vendor continues to meet required standards. The Contractor should request documentation from the vendor to verify their accreditation status. This may include certifications or licences from relevant regulatory authority. The Contractor must review the vendor's experience, qualifications, and track record in handling similar waste disposal requirements, due to the linear nature of the project. Assess the vendor's capacity to handle the volume of sewage and liquid sanitary wastewater generated 	Vendor Evaluation Process	Mota Engil	Within 6 Months of 1 st drawdown

Index	Finding / Deficiency	Risk Ranking	Action Items / Recommendations	Completion Indicator	Responsibility	Completion Timeframe
			at the project site this may include the vendor's equipment, resources, and workforce to ensure they can effectively and efficiently manage the waste disposal process.			
PS3/OS3-02	<p>Hazardous waste management</p> <p>Localized oil spills were observed in the bulk storage area for diesel fuel at Kazaure camp. In addition, structural openings were noted that could compromise the efficiency of the bunded area at the fuel dump were noted.</p>	Moderate	<ul style="list-style-type: none"> Implement proper maintenance and inspection procedures for the bulk storage area for diesel fuel and the bunded area at the fuel dump to identify any potential issues or damage that may reduce efficiency or lead to oil spills. In this way, maintenance or repair needs can be addressed promptly and prevent spills or leaks. Improve containment measures in the bulk storage area and the bunded area to prevent oil spills. This may include reinforcing the bunded area with additional barriers or liners to ensure that any spills are contained within the designated area. Train personnel on spill response including proper spill handling, containment measures and the use of appropriate equipment and materials for cleanup. 	Maintenance and Inspection Procedure	Mota Engil	Within 6 Months of 1 st drawdown
PS3/OS3/OS1-03	<p>Resource Efficiency (Greenhouse Gas emissions)</p> <p>The Contractor does not have an energy conservation and efficiency plan in place.</p> <p>The contractor has not completed an CO₂eq emissions inventory in terms of Scope 1 and 2.</p>	Moderate	<ul style="list-style-type: none"> The Contractor should conduct an Emissions inventory and audit of the project site to identify areas of emissions sources and inefficiency. Based on the findings of the audits, the Contractor should develop a comprehensive energy conservation and efficiency plan outlining specific strategies and actions to reduce energy consumption and reduce GHG emissions, improve energy efficiency and promote sustainable practices In addition, the Contractor should establish clear energy reduction targets as part of the GHG reduction plan. These targets can serve as benchmarks for measuring progress and ensuring accountability. 	<p>Energy Conservation and Efficiency Plan</p> <p>GHG emissions reduction plan</p>	Mota Engil	Within 6 Months of 2 nd drawdown, or before 3 rd draw down, which ever is sooner
PS4/OS4-04	<p>Community Health and Safety</p> <ul style="list-style-type: none"> It is unclear whether the Social and Community Sustainability Plan also includes: <ul style="list-style-type: none"> Risks and Hazards associated with the operational phase of the project. Risks and hazards associated with potential for drowning by community members or livestock through the collection of drinking water from a nearby water source. 	Moderate	<ul style="list-style-type: none"> Ensure that the Contractor Social and Community Sustainability Plan is updated to include: <ul style="list-style-type: none"> communicable disease mitigation, influx population, provisioning and regulating ecosystems services, equipment & infrastructure use and transportation, Drilling and blasting, health services infrastructure, and traffic management. 	<p>Updated Contractor Social and Community Sustainability Plan</p> <p>Community Health and Safety Risk Assessment</p>	Mota Engil	<p>Within 3 Months of 1st drawdown or before construction of the railway line commences in rural populated areas.</p> <p>Within 3 to 6 Months of 1st drawdown or before construction is completed in major urban, populated areas.</p>

Index	Finding / Deficiency	Risk Ranking	Action Items / Recommendations	Completion Indicator	Responsibility	Completion Timeframe
	<ul style="list-style-type: none"> - A comprehensive risk assessment in relation to: <ul style="list-style-type: none"> • communicable disease mitigation, • influx population, • drilling and blasting, • provisioning and regulating ecosystems services, • equipment & infrastructure use and transportation, and • health services infrastructure and traffic management. 		<ul style="list-style-type: none"> • The project should develop a Community Health and Safety Risk Assessment in consultation with the relevant stakeholders. 			
PS4/OS 4-05	<p>Emergency Preparedness and Response</p> <ul style="list-style-type: none"> ▪ Whilst the Emergency Preparedness and Response plan covers emergencies such as medical emergency, fire emergency, environmental emergency, evacuation, incidents, accidents and hazards, it is unclear how the plan addresses the Project's response to emergencies that could affect the communities and Emergency response mechanisms associated with the quarries are not included in the project EPP. It also does not include disclosure of appropriate information to affected communities, relevant government agencies and other relevant parties. 	High	<ul style="list-style-type: none"> • The emergency response plan should be revised so that it incorporates the requirements of IFC PS 4. The plan should indicate how the Project will engage in informing the host and affected communities, as well as external stakeholders about the project risks and collaborating with local communities and local government agencies to respond effectively to emergency situations especially when their participation and collaboration are necessary to respond to certain emergency situations. 	Revised Emergency Preparedness and Response Plan with community content	Mota Engil	Within 1 Month of 1 st drawdown
PS4/OS4-06	<p>Security Management</p> <p>Garda World Security, a leading private security firm with licence to engage the Military, the Police and the Nigerian Security and Civil Defence Corps work together to provide security for the project. They are also assisted by a local security organisation (CEFO) that helps to interface with the communities.</p> <p>Nigerian Law does not permit the arming of Private security personnel.</p> <p>Reportedly, all armed guards (military and Police) have undergone training; however no formal polices, or documents were</p>	Moderate	<p>Update the Security Management Plan (SMP):</p> <ul style="list-style-type: none"> • to include extent to which force may be used during the project construction and operational phases, including threats faced by staff at the Project site, when travelling to and from work. • to include the role of security personnel in protecting and respecting community human rights. • to reflect actual security practices taking place on site. • Develop a separate Security Risk Assessment which aligns to the Security Management Plan. 	<p>Documents to be revised included (not limited) to the following:</p> <p>Security Operations Management Plan;</p> <p>SOP Security Plan;</p> <p>Security Threat Report;</p> <p>Security Code of Conduct Guideline;</p> <p>Contractor's Africa Security Services for the Kano-Maradi Railway Project -TECHNICAL PROPOSAL</p>	Mota Engil	Within 3 Months of 1 st drawdown

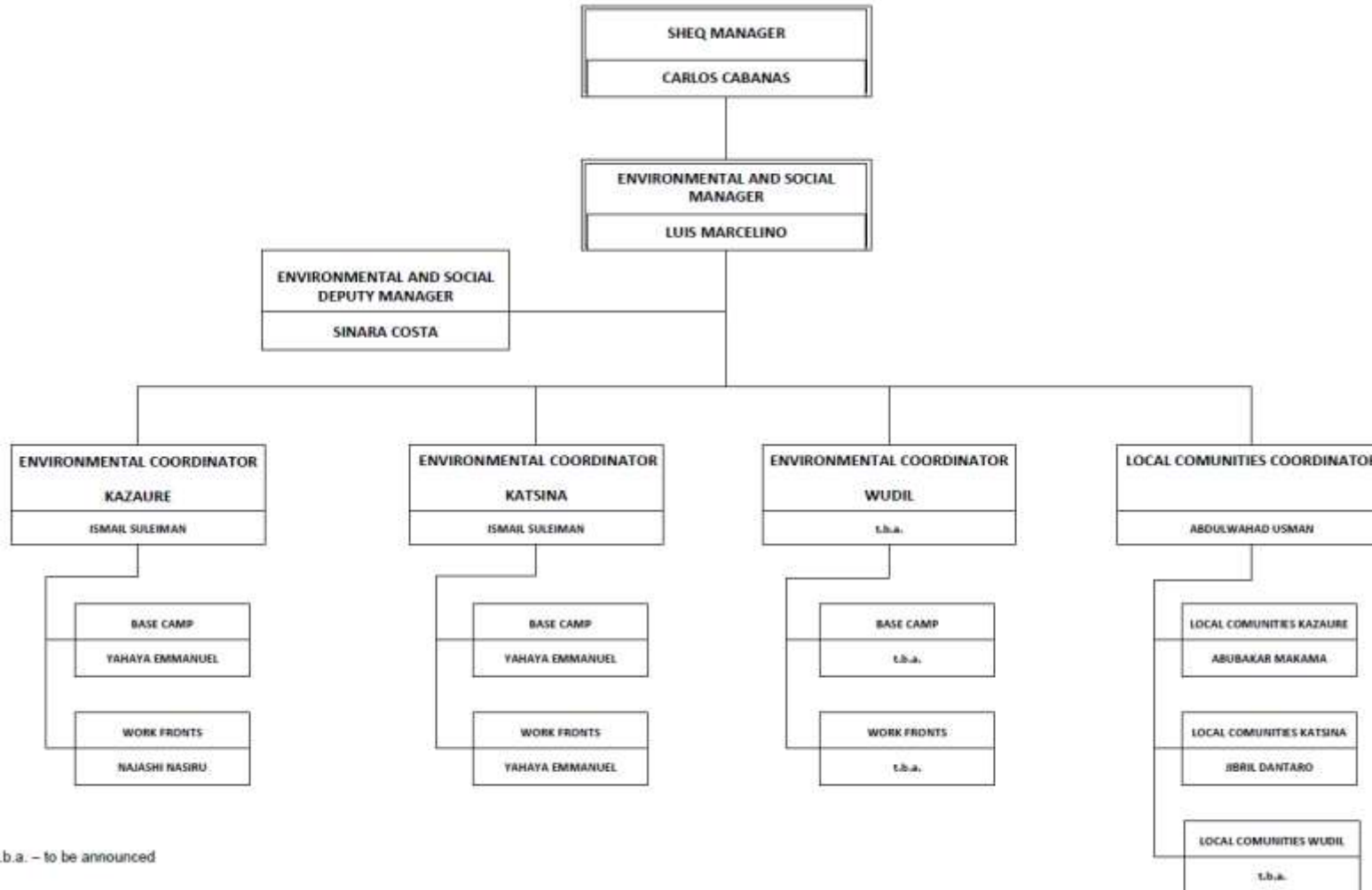
Index	Finding / Deficiency	Risk Ranking	Action Items / Recommendations	Completion Indicator	Responsibility	Completion Timeframe
	provided on the use of reasonable force. No separate Security Risk Assessment was made available for review.			Security Risk Assessment		
PS5/OS5 01	<p>Compensation Rates</p> <p>Compensation rates for loss of structures, crops, and trees is based on government rates with no adjusted to inflation or the provisions of the Land Use Act. This has resulted in significant number of aggrieved persons. Furthermore, some PAPs' compensation was paid to unknown individuals which reflect potential unlawful behaviour in the process.</p>	High	<ul style="list-style-type: none"> Update the entitlement and compensation matrix to reflect additional entitlements and compensation for PAPs, refer below. Review, adjust and update compensation rates and valuation reports. Conduct stakeholder engagement to present the updated compensation rates to PAPs and PACs. Payment of cash compensation to PAPs including the supplementary payment for PAPs that have received their compensation. Investigate incidences where cash compensation was paid to people not affected b the project whilst the impacted persons remain uncompensated for their loses. 	<ul style="list-style-type: none"> Updated entitlement and compensation matrix. Payment of cash compensation to PAPs. Completion of investigations of stolen cash compensation. Resettlement audit to be undertaken 	Mota Engil	Before project appraisal
PS5/OS5 02	<p>Loss of access to land</p> <p>Loss of access to land is not addressed in the RAP/LRP documents, as these are developed to comply with the Land Use Act of Nigeria, which advocates for payment of compensation for improvements on the land and standing trees and crops. In addition, no considerations have been made towards replacement of land for vulnerable persons and households, nor is the percentage of land lost to the project by a household considered in relation to payable compensation. It is noted that some areas of agricultural fields and livestock grazing will be lost to the rail alignment, and the loss of this land and related compensation for this is not well understood, particularly if they were deemed to be not "productive" at the time of the RAP assessment.</p> <p>Squatters and other persons with no formal land rights are not eligible for compensation, this is a misalignment with IFC requirements. Communal resources with customary rights are also not eligible for compensation, which is non-compliant.</p>	High	<ul style="list-style-type: none"> Review and update the displacement impacts identified to reflect impacts associated with the loss of land -both residential and agricultural land. Review and update the eligibility criteria and entitlement framework to incorporate compensation measures associated with loss of land. The revision should also pay special attention to measures to support. vulnerable persons. Review and revise the eligibility criteria to include all persons eligible for compensation in line with the provisions of the IFC. 	<ul style="list-style-type: none"> Resettlement audit to be undertaken An updated RAP/LRP 	Mota Engil	Before project appraisal

Index	Finding / Deficiency	Risk Ranking	Action Items / Recommendations	Completion Indicator	Responsibility	Completion Timeframe
PS5/OS5 03	<p>Resettlement Action Plans</p> <p>Overall, both RAP/LRP documents indicate that they seek to align with Good international industry practice standards (GIIP), however, both documents mostly do not follow these standards particularly in application of the most stringent provisions between national legislation and GIIP. Citing the GIIP standards is not enough when these are not incorporated fully into the document.</p> <p>Furthermore, it is clear that the supplementary RAP/LRP was adapted from the Section 1 RAP/LRP because of information being similar across the documents as it relates to Nigeria, and one-line details for Niger sporadically added with the exception of the legal framework and baseline section.</p>	Moderate	<ul style="list-style-type: none"> Review and revise the entire RAP/LRP document to ensure equitable descriptions of each country's applicable information is captured and balance across the document. Review and revise the RAP/LRP document to align with the provisions of the IIGPs and in cases where the project deviates from following the standards 	Updated RAP/LRP	Mota Engil	Action to be completed as soon as possible. Report/s to be disclosed before project appraisal.
PS5/OS5 04	<p>Restoration of Livelihoods</p> <p>The project strategies to bridge the gap between the national legislation and GIIP requirements does not match the details discussed under specific RAP/LRP documents, e.g. the project will only support the restoration of livelihood of vulnerable persons; subsequently, all PAPs will participate in the LRP. These are some of the inconsistencies found in the reports.</p>	Moderate	Review and align the various chapters of the RAP/LRP documents and create linkages between different sections considering the final agreed principles and approaches to compensation by the developer.	Updated RAP/LRP report	Mota Engil	Action to be completed as soon as possible. Report/s to be disclosed before project appraisal.
PS5/OS5 05	<p>Valuation and Compensation</p> <p>The valuation and compensation currency used are supposed to be the Naira and West African CFA Franc. However, all compensation is denoted in Naira and it is unclear if there was an agreement reached between the governments to use a single currency at some point, but the RAP/LRP documents were not updated. If this was an error, this needs to be revised in the reports, and if it intentional then this must be explained.</p>	Moderate	<ul style="list-style-type: none"> Amend valuation and compensation rates to be used to the relevant country currency. Reissue valuation report to PAPs for approval of the adjustments. 	Updated budget currencies for each country budget	Mota Engil	Within 3 Months of 1 st drawdown

Index	Finding / Deficiency	Risk Ranking	Action Items / Recommendations	Completion Indicator	Responsibility	Completion Timeframe
PS5/OS5 06	<p>Grievance Redress Mechanisms</p> <p>From stakeholder interviews, it is apparent that the grievance redress mechanism has not been widely publicised. Furthermore, the grievance redress committee was not established, no grievance officers were appointed, and community leaders were not sensitised about the existence of the grievance mechanism.</p>	High	<ul style="list-style-type: none"> Undertake grievance redress mechanism awareness campaign to sensitise PAPs and PACs as well as community leaders of its existence. Deploy grievance officers in strategic locations who will assist PAPs and PAC members to lodge grievances and follow-ups related to grievance redress. In each PAC, establish a grievance redress committee who will work closely with FMoT appointed grievance officers to ensuring that all grievances are registered and redressed timeously. 	<ul style="list-style-type: none"> Proof of GRM awareness campaigns conducted. Number of grievances registered per month. GRC established in each PAC. 	Mota Engil	Within 3 Months of 1 st drawdown
PS5/OS5 07	<p>Vulnerable persons assessment</p> <p>The assessment of vulnerable persons is generic and regarded as incomplete since it does not consider multi-dimensional vulnerabilities of PAPs and other persons who may be vulnerable due to the project's land acquisitions such as illegal land users, and squatters which the eligibility criteria deem as not eligible for compensation, and land users who had rights to land but at the time of the valuation the land was fallow. Such groups may end-up vulnerable due to the project.</p>	High	Review and revise the vulnerability assessment to consider multi-dimensional vulnerability of PAPs and PACs. The assessment should also include persons likely to be made vulnerable by the project where these individuals are deemed not to be eligible for compensation.	An updated vulnerability assessment to be undertaken during Resettlement audit.	Mota Engil	Before project appraisal
PS6/OS 6-01	<p>Ecosystems delineation</p> <p>No full species list, as observed, was provided, which is mostly lacking for plants. This is because indigenous species are to be used for rehabilitation and no-net-loss activities, and this cannot be verified nor measured if the original/natural species composition is not reported on.</p> <p>The above also leads to the under-estimation of the importance of retaining as many Baobab trees as possible due to their role as ecosystem keystone species. BMP to be cross-referenced in all other management plans that could potentially have an impact on biodiversity.</p>	Moderate	<ul style="list-style-type: none"> Ensure that the BMP renders higher importance to Baobab trees than just nesting sites, and that soil compaction, groundworks and other disturbances be avoided within a radius of at least 15m of the tree. As part of completion of the RAP, determine the type and extent of natural/semi-natural habitats that could be impacted by land needs, and undertake at least a screening of biodiversity for any potential sensitivities. Monitoring protocols that cover all aspects of biodiversity and related ecosystem stability and enable the tracking of progress / efficiency of mitigation measures from construction to operation and where applicable, decommissioning. Ensure BMP is cross-referenced adequately across all relevant plans. 	<ul style="list-style-type: none"> Maximum number of Baobab trees retained within the Project footprint. Risks and/or impacts to biodiversity by RAP implementation understood and mitigated. Adequate cross-referencing of the BMP across all relevant management plans. 	Mota Engil	<ul style="list-style-type: none"> As soon as practically possible to avoid delays in site preparation and construction as understood to be in its initial phases. Before construction and final planning of all crossing associated with larger rivers and/or forest reserves. Monitoring to be continued through construction and operation and decommissioning.
PS6/OS 6-02	<p>Rehabilitation Plans and restoration of ecosystems</p>	Low	<ul style="list-style-type: none"> Extract the full species list from the original biodiversity baselines. If this is not available, a duly qualified ecologist should be engaged to compile at least a full species list for riparian and aquatic flora, 	<ul style="list-style-type: none"> Refined rehabilitation plan and associated cultivation and/or seeding of species. 	Mota Engil	As soon as practically possible, before significant continuation of

Index	Finding / Deficiency	Risk Ranking	Action Items / Recommendations	Completion Indicator	Responsibility	Completion Timeframe
	<p>Poor re-instatement of riparian areas and poor performance of no-net-loss measures will lead to gradual loss of ecosystem services. With the current lack on natural species composition of natural habitats, progress towards rehabilitation and no-net-loss by enhancement of degraded areas cannot be measured.</p> <p>Inconsistency relating to dealing with cleared vegetation between BMP and Project description.</p>		<p>and a list of indigenous grasses and potentially low/prostrate perennial forbs or dwarf shrubs that can be used for rehabilitation.</p> <ul style="list-style-type: none"> • Use these species lists to refine the rehabilitation plan to avoid further damage to ecosystem services. • Align sections of the ESIA dealing with cleared vegetation to the BMP. 	<ul style="list-style-type: none"> ▪ Optimally efficient and long-term sustainable rehabilitation implemented. ▪ Unambiguous guidelines on dealing with cleared vegetation. 		<p>construction to facilitate progressive rehabilitation.</p>
PS6/OS 6-03;	<p>Biodiversity Management Plan, and species list</p> <p>Without more detailed information on actual species composition and species to be used for rehabilitation and no-net-loss activities, the efficiency of conservation actions over time cannot be verified, especially in forest reserves.</p> <p>As indicated under PS6-01, some forest reserves are likely seasonal wetlands, but this has not been adequately investigated and may lead to insufficient drainage being installed. This may potentially lead to further loss of protected areas ecosystem stability or where already modified to croplands, ecosystem productivity.</p>	High	<ul style="list-style-type: none"> • Using these maps and the species lists as specified in PS6-02, refine the planning and monitoring of rehabilitation and conservation activities in a way that is practical, measurable and sustainable in the long term. • As per PS6-01, appoint a duly qualified wetland specialist to determine the full extent of wetland characteristics. 	<ul style="list-style-type: none"> ▪ Updated BMP ▪ More detailed rehabilitation plan and no-net-loss activities, including list of desirable species and desirable cover of each to be achieved. ▪ More detailed monitoring plan enabling the tracking of rehabilitation progress and achievement of no-net loss goals (or adaptive management actions if required). 	Mota Engil	<ul style="list-style-type: none"> ▪ As soon as practically possible, before significant continuation of construction to facilitate progressive rehabilitation and implementation of no-net loss programs. ▪ Monitoring to be continued through construction and operation and decommissioning where applicable.

APPENDIX A MOTA ENGIL ORGANOGRAM



APPENDIX B PROTECTED AREA REGISTER

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

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

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

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

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

APPENDIX C VDR DOCUMENT LIST

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

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

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

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

92	Kano-Maradi Final RAP Section 1 and Supplementary RAP
93	III.B.4 route screening update
94	2023_Kano_Maradi_ESIA Report (Final): 03 Project Description
95	Final ESIA Technical Annex F: Water Resources
96	Final ESIA Technical Annex G: Biodiversity
97	Biodiversity management plan
98	SKonica Min24032111370
99	SKonica Min24032111380
100	SKonica Min24032111401
101	2023_Kano_Maradi_ESIA Report (Final)
102	2023_Kano_Maradi_ESIA Report (Final): 03 Project Description
103	MEA Nigeria KM railway land and biodiversity route screening updated 24052021
104	2023_Kano_Maradi_ESIA Report (Final): 07 Baseline Summary
105	20240313 NIG_KAMA_FM_2024_1498 - Forest Reserves Affected by the Project
106	NIG.KAMA.AG.2022.262 - FMoE Forest reserve annex
107	NIG.KAMA.AG.2022.252 FmoT FMoE Forest reserve grave sites
108	V.A. 1.1 1620011906-RAM-RP-IA-00039_Ch08_Impact Assessment1
109	ESIA Preliminary Early works on ESMP (Dawanau to Kazaure Section);
110	Chance Find Procedure
111	Cultural Heritage Management Plan

APPENDIX D SITE PHOTOGRAPHS



Photograph 1: Discussion with Human Resource Representatives



Photograph 2: Discussion with Camp Clinic Representatives



Photograph 3: Discussion with Environmental and Social Manager



Photograph 4: Discussion with Health and Safety Manager



Photograph 5: Discussion with Security Managers



Photograph 6: Discussion with Site Camp Manager



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

Photograph 8: Discussion with the Subcontractor Representatives



Photograph 9: Focus Group Discussion with Female Workers

Photograph 10: Focus Group Discussion with Male Workers



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



Photograph 12: FGD with Unguwar Dinya Community, Jigawa State



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

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



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



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



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



Photograph 18: RoW ground-truthing in Niger Republic



Photograph 19: RoW ground-truthing in Niger Republic



Photograph 20: RoW ground-truthing in Niger Republic



Photograph 21: RoW ground-truthing in Niger Republic



Photograph 22: Mobile toilet facilities at Kazaure Camp Site



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



Photograph 24: Safety precautions displayed at Kazaure campsite



Photograph 25: Sample single-occupant room at Kazaure camp

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



Photograph 27: Offsite accommodation facility at Kazaure

Photograph 28: Recreational areas at Kazaure camp



Photograph 29: Group photograph, Ministry of Environment, Katsina



Photograph 30: Group photograph at Ungwar Dinya Community



Photograph 31: Group photograph, Sandamu LGA, Katsina State

Photograph 32: Group photograph Kunchi Quarry communities, Kano



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



Photograph 34: Ongoing sleeper factory construction at Kazaure



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



Photograph 36: Section of construction machinery at Kazaure



Photograph 37: Batching plant at Kazaure camp

Photograph 38: SHEQ organogram at camp office



Photograph 39: Section of Kunchi Quarry, Kano State



Photograph 40: Section of Kunchi Quarry, Kano State

APPENDIX E ATTENDANCE LOG

ENVIRONMENTAL ACCORD NIGERIA LIMITED 5th, Ogbonna Crescent, Ikeja (Phase II), Lagos 10124 (Tel: 01-261-9800, 01-261-9801) info@envaccord.com http://www.envaccord.com		ATTENDANCE			
Project Title	ENVIRONMENT AND SOCIAL DUE DILIGENCE FOR THE KANO-MARADI RAILWAY PROJECT				
Purpose/Activity	IDI WITH HUMAN RESOURCE MANAGER				
Date	11/03/2024				
Venue	CAMP SITE				
S/N	Name	Community	Designation	Phone Number	Signature
1	Mr. [Handwritten]	Mala-Baji	HC	0812228222	[Signature]
2	Mr. [Handwritten]	Mala-Baji	C.O.	0812228222	[Signature]
3	Mr. [Handwritten]	Mala-Baji	Security Manager	0812228222	[Signature]
4	Mr. [Handwritten]	Mala-Baji	HC	0812228222	[Signature]
5	Mr. [Handwritten]	Mala-Baji	HC	0812228222	[Signature]

Discussion with Human Resource Representatives

ENVIRONMENTAL ACCORD NIGERIA LIMITED 5th, Ogbonna Crescent, Ikeja (Phase II), Lagos 10124 (Tel: 01-261-9800, 01-261-9801) info@envaccord.com http://www.envaccord.com		ATTENDANCE			
Project Title	ENVIRONMENT AND SOCIAL DUE DILIGENCE FOR THE KANO-MARADI RAILWAY PROJECT				
Purpose/Activity	HEALTH CLINIC				
Date	11/03/2024				
Venue	CAMP SITE				
S/N	Name	Community	Designation	Phone Number	Signature
1	Mr. [Handwritten]	Mala-Baji	HC	0812228222	[Signature]
2	Mr. [Handwritten]	Mala-Baji	HC	0812228222	[Signature]
3	Mr. [Handwritten]	Mala-Baji	HC	0812228222	[Signature]
4	Mr. [Handwritten]	Mala-Baji	HC	0812228222	[Signature]

Discussion with Camp Clinic Representatives

ENVIRONMENTAL ACCORD NIGERIA LIMITED 5th, Ogbonna Crescent, Ikeja (Phase II), Lagos 10124 (Tel: 01-261-9800, 01-261-9801) info@envaccord.com http://www.envaccord.com		ATTENDANCE			
Project Title	ENVIRONMENT AND SOCIAL DUE DILIGENCE FOR THE KANO-MARADI RAILWAY PROJECT				
Purpose/Activity	IDI WITH HEALTH AND SAFETY TEAM				
Date	14/03/2024				
Venue	CAMP SITE				
S/N	Name	Community	Designation	Phone Number	Signature
1	Mr. [Handwritten]	Mala-Baji	HSE Manager	0812228222	[Signature]
2	Mr. [Handwritten]	Mala-Baji	HSE Manager	0812228222	[Signature]
3	Mr. [Handwritten]	Mala-Baji	HSE Manager	0812228222	[Signature]
4	Mr. [Handwritten]	Mala-Baji	HSE Manager	0812228222	[Signature]

Discussion with E&S and HSE Managers

ENVIRONMENTAL ACCORD NIGERIA LIMITED 5th, Ogbonna Crescent, Ikeja (Phase II), Lagos 10124 (Tel: 01-261-9800, 01-261-9801) info@envaccord.com http://www.envaccord.com		ATTENDANCE			
Project Title	ENVIRONMENT AND SOCIAL DUE DILIGENCE FOR THE KANO-MARADI RAILWAY PROJECT				
Purpose/Activity	DISCUSSIONS WITH THE SECURITY MANAGERS				
Date	11/03/2024				
Venue	KAZADURE CAMP SITE				
S/N	Name	Community	Designation	Phone Number	Signature
1	Mr. [Handwritten]	Mala-Baji	Security Manager	0812228222	[Signature]
2	Mr. [Handwritten]	Mala-Baji	Security Manager	0812228222	[Signature]
3	Mr. [Handwritten]	Mala-Baji	Security Manager	0812228222	[Signature]

Discussion with Security Managers



ENVIRONMENTAL ACTION WATCH LIMITED 204, GARDENIA GARDENS, SHANBAI STREET 11 Lagos 10114-1011-1101 (NIGERIA) www.environmentalactionwatch.com		ATTENDANCE		EnvAccord	
Project Title	ENVIRONMENT AND SOCIAL DUE DILIGENCE FOR THE KANO-MARADI RAILWAY PROJECT				
Purpose/Activity	DISCUSSIONS WITH CAMP SITE MANAGER AND COMMUNITY LIAISON OFFICERS				
Date	15/03/2024				
Venue	CAMP SITE				
S/N	Name	Community	Designation	Phone Number	Signature
1	Abdullahi Yusuf	Yankari	CAMP SITE MANAGER	0712444112	[Signature]
2	Abdullahi Yusuf	MENGI	C.L.O	0712444112	[Signature]
3	Abdullahi Yusuf	MENGI	C.L.C	0912444112	[Signature]

Discussions with Kazaure Camp Manager, Community Liaison Coordinator and Officer

ENVIRONMENTAL ACTION WATCH LIMITED 204, GARDENIA GARDENS, SHANBAI STREET 11 Lagos 10114-1011-1101 (NIGERIA) www.environmentalactionwatch.com		ATTENDANCE		EnvAccord	
Project Title	ENVIRONMENT AND SOCIAL DUE DILIGENCE FOR THE KANO-MARADI RAILWAY PROJECT				
Purpose/Activity	DISCUSSIONS WITH DIESEL SUBCONTRACTOR MANAGER				
Date	15/03/2024				
Venue	CAMP SITE				
S/N	Name	Community	Designation	Phone Number	Signature
1	Nura Nura	Yankari	MANAGER	0712444112	[Signature]
2	Abdullahi Yusuf	MENGI	C.L.O	0712444112	[Signature]
3	Abdullahi Yusuf	MENGI	C.L.C	0912444112	[Signature]

Discussions with the Subcontractor Representatives

ENVIRONMENTAL ACTION WATCH LIMITED 204, GARDENIA GARDENS, SHANBAI STREET 11 Lagos 10114-1011-1101 (NIGERIA) www.environmentalactionwatch.com		ATTENDANCE		EnvAccord	
Project Title	ENVIRONMENT AND SOCIAL DUE DILIGENCE FOR THE KANO-MARADI RAILWAY PROJECT				
Purpose/Activity	DISCUSSIONS WITH COMMUNITY FROM HUGUNGUMI, MAKOLAWA, M. DANJARA				
Date	15/03/2024				
Venue	KUMCHI QUARY, KANO STATE				
S/N	Name	Community	Designation	Phone Number	Signature
1	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
2	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
3	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
4	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
5	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
6	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
7	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
8	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
9	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
10	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
11	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
12	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
13	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
14	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]

FGD with Communities in Kunchi Quarry, Kano State

ENVIRONMENTAL ACTION WATCH LIMITED 204, GARDENIA GARDENS, SHANBAI STREET 11 Lagos 10114-1011-1101 (NIGERIA) www.environmentalactionwatch.com		ATTENDANCE		EnvAccord	
Project Title	ENVIRONMENT AND SOCIAL DUE DILIGENCE FOR THE KANO-MARADI RAILWAY PROJECT				
Purpose/Activity	DISCUSSIONS WITH COMMUNITY FROM HUGUNGUMI, MAKOLAWA, M. DANJARA				
Date	15/03/2024				
Venue	KUNCHI QUARY, KANO STATE				
S/N	Name	Community	Designation	Phone Number	Signature
14	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
15	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
16	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
17	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
18	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
19	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
20	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
21	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
22	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
23	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
24	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
25	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]
26	Abdullahi Yusuf	Hugungumi	Yankari	0712444112	[Signature]

FGD with Communities, Kunchi Quarry, Kano State



NIGERIA SEP ATTENDANCE LIST KAMA PROJECT / SUSTAINABILITY (S&S) REPORTING PERIOD

General Information

Date: 14 Aug 2024 ID Number: AIG/KAMA/102

Location of Meeting (Community name): Unguwar Dinya, Baki L.S.A, Jigawa State

Purpose of Engagement: FGD, AIG, OILS&S

Number of Attendees: 17 (Seventeen)

Name of Person Recording Attendance: AIG/KAMA/102/102/102

#	First Name	Surname	Sex (M/F)	Place of Residence (Community, State)	Position	Contact Details (Telephone, Email)	Signature
1	Abubakar	Yansari	M	Yansari, Unguwar Dinya	U/Dir	08055992013	[Signature]
2	Muhammed	Ibrahim	M	Yansari, Unguwar Dinya	U/Dir	07085138530	[Signature]
3	Saliyu	Ibrahim	M	U/Bungo	Member	08076890067	[Signature]

NIGERIA SEP ATTENDANCE LIST KAMA PROJECT / SUSTAINABILITY (S&S) REPORTING PERIOD

4	Abubakar	Yansari	M	U/Bungo	Member	0705762502	[Signature]
5	Suleist	Abdulkadir	M	U/Bungo	Member	07060902673	[Signature]
6	Lado	Muhammed	M	U/Bungo	Member	07020270058	[Signature]
7	Bala	Garba	M	U/Bungo	Member	08120215289	[Signature]
8	Shacibu	Abdulkali	M	U/Bungo	Member	08157491807	[Signature]
9	Haruna	Ibrahim	M	U/Bungo	Member	08126226705	[Signature]
10	Adamu	Ahmed	M	U/Bungo	Member	07067293192	[Signature]

FGD with Unguwar Dinya Community, Jigawa State

FGD with Unguwar Dinya Community, Jigawa State

NIGERIA SEP ATTENDANCE LIST KAMA PROJECT / SUSTAINABILITY (S&S) REPORTING PERIOD

11	LAYS	MARCELINO	M	KAMA	OPS MANAGER	08055992013	[Signature]
12	ARHAI	LAYS	M	LAYS	SENIOR STENOGRAPHER	08055992013	[Signature]
13	Abubakar	Abubakar	M	KAMA	U/Dir	08055992013	[Signature]
14	Abubakar S.	MAKAMU	M	NEK-DUCE, Karamo	CLO	08055992013	[Signature]
15	Haruna	Ibrahim	F	AFEB	US	08055992013	[Signature]
16	Abubakar	Abubakar	M	KAMA	OPS CLC	08055992013	[Signature]
17	Ray	Haruna	M	AFEB	OPS CLC	08055992013	[Signature]

NIGERIA SEP ATTENDANCE LIST KAMA PROJECT / SUSTAINABILITY (S&S) REPORTING PERIOD

General Information

Date: 14/08/2024 ID Number: NIG/KAMA/102

Location of Meeting (Community, State): IBA, Sandamu LGA, Katsina State

Purpose of Engagement: AIG, S&S, Environmental Due Diligence (on visit)

Number of Attendees: Twenty - NINE (29)

Name of Person Recording Attendance: AIG/KAMA/102/102/102

#/S	First Name	Surname	Sex (M/F)	Place of Residence (Community, State)	Position	Contact Details (Telephone, Email)	Signature
1	Abubakar	Abubakar	M	AUSA, Katsina	CEO	08055992013	[Signature]
2	Abubakar	Abubakar	M	LAYS	U/Dir	08055992013	[Signature]
3	Muhammed	Nasir	M	IUSA	PAP	08055992013	[Signature]
4	Abubakar	Ibrahim	M	IUSA	PAP	08055992013	[Signature]
5	ISA	Sani	M	IUSA	PAP	08055992013	[Signature]

FGD with Unguwar Dinya Community, Jigawa State

FGD with Communities in Sandamu LGA, Katsina State



NGDMA
SEP ATTENDANCE LIST
NAMA PROJECT | SUSTAINABILITY (SWS) | SANDAMU LGA

S/N	First Name	Surname	Sex (M/F)	Place of Residence (Community, District)	Position	Contact Details (Telephone, email)	Signature
1	Amadu	Umar	M	S/A Jiba	PAP		
2	Dauda	Umar	M	Jiba	PAP		
3	Tasi	Umar	M	Jiba	SWP		
4	Lamin	Umar	M	Jiba			
5	Lamin	Umar	M	Jiba			
6	Samin	Umar	M	Jiba	PAP		
7	Amadu	Umar	M	Jiba		0919286323	
8	Amadu	Umar	M	Jiba		0902115200	
9	Amadu	Umar	M	S/A Jiba			
10	Amadu	Umar	M	S/A Jiba		090133049	
11	Umar	Umar	M	Jiba			

FGD with Communities in Sandamu LGA, Katsina State

NGDMA
SEP ATTENDANCE LIST
NAMA PROJECT | SUSTAINABILITY (SWS) | SANDAMU LGA

S/N	First Name	Surname	Sex (M/F)	Place of Residence (Community, District)	Position	Contact Details (Telephone, email)	Signature
17	Ali	Umar	M	Jiba	PAP		
18	Amadu	Umar	M	S/A Jiba	PAP	09137654677	
19	Yusuf	Umar	M	S/A Jiba	PAP	0901630521	
20	Ali	Umar	M	FUTA	PAP	0909992172	
21	Abdullah	Umar	M	MEDC	C.L.A	0909992172	
22	Amadu	Umar	M	APAS	BO	0902725700	
23	Amadu	Umar	M	FUTA	Amadu	09017716	
24	Amadu	Umar	M	Jiba	Umar	0903916727	
25	Amadu	Umar	M	Jiba	Umar	0903916727	
26	Amadu	Umar	F	APAS	Amadu	09017716	
27	Amadu	Umar	M	FUTA	Amadu	0903916727	

FGD with Communities in Sandamu LGA, Katsina State

NGDMA
SEP ATTENDANCE LIST
NAMA PROJECT | SUSTAINABILITY (SWS) | SANDAMU LGA

S/N	First Name	Surname	Sex (M/F)	Place of Residence (Community, District)	Position	Contact Details (Telephone, email)	Signature
28	Jaka	Umar	M	MBAC	CEO	0902115200	
29	Amadu	Umar	M	FUTA	Amadu	09017716	
30							
31							
32							
33							
34							
35							
36							
37							
38							

FGD with Communities in Sandamu LGA, Katsina State

SEP ATTENDANCE LIST
NAMA PROJECT | SUSTAINABILITY (SWS) | SANDAMU LGA

S/N	First Name	Surname	Sex (M/F)	Place of Residence (Community, District)	Position	Contact Details (Telephone, email)	Signature
1	Ali	Umar	M	Jiba	PAP		
2	Amadu	Umar	M	S/A Jiba	PAP		
3	Amadu	Umar	M	S/A Jiba	PAP		

Date: 14/08/2024
 Location of Meeting (Community, District): KAZAURE EMIR PALACE, JIGAWA STATE
 Name of Facilitator: M. A. S. ALI
 Name of Note Taker: M. A. S. ALI
 Name of Meeting Recording Attendance: M. A. S. ALI

Discussions with Elders in Kazaure Emir Palace, Jigawa State



SEP ATTENDANCE LIST
KAMA PROJECT | SUSTAINABILITY SERIES
08/20/19-02/20/20

1	Umar Tafara Adamu	M	EMIR	EMIR PALACE	KAZAURE EMIR PALACE	
2	Muhammad Ibrahim	M	EMIR PALACE	EMIR PALACE	KAZAURE EMIR PALACE	
3	Nura Yusuf Ali Abdullahi	M	EMIR PALACE	EMIR PALACE	KAZAURE EMIR PALACE	
4	Yusuf Muhammad					
5	Yusuf Muhammad	M	EMIR PALACE	EMIR PALACE	KAZAURE EMIR PALACE	
6	Adamu Umar D	M	EMIR PALACE	EMIR PALACE	KAZAURE EMIR PALACE	
7	Sani Umar	M	EMIR PALACE	EMIR PALACE	KAZAURE EMIR PALACE	

Discussions with Elders in Kazaure Emir Palace, Jigawa State

SEP ATTENDANCE LIST
KAMA PROJECT | SUSTAINABILITY SERIES
08/20/19-02/20/20

11	Eng. Nura A. Cobani	M	EMIR	EMIR PALACE	KAZAURE EMIR PALACE	
12	Abdul	M	EMIR	EMIR PALACE	KAZAURE EMIR PALACE	
13	Lois	M	EMIR	EMIR PALACE	KAZAURE EMIR PALACE	
14	Abdul	M	EMIR	EMIR PALACE	KAZAURE EMIR PALACE	
15	Abdul	M	EMIR	EMIR PALACE	KAZAURE EMIR PALACE	
16	Abdul	M	EMIR	EMIR PALACE	KAZAURE EMIR PALACE	
17	Furqan Taha	F	EMIR	EMIR PALACE	KAZAURE EMIR PALACE	

Discussions with Elders in Kazaure Emir Palace, Jigawa State

SEP ATTENDANCE LIST
KAMA PROJECT | SUSTAINABILITY SERIES
08/20/19-02/20/20

11	Eng.	M	EMIR	EMIR PALACE	KAZAURE EMIR PALACE	
12	Email	M	EMIR	EMIR PALACE	KAZAURE EMIR PALACE	

Discussions with Elders in Kazaure Emir Palace, Jigawa State

ENVIRONMENTAL ACCORD KATSINA LIMITED
105, Gidanau Crescent, Ikegala (Phase II)
Lagos 101145 1101 0810 300 450
www.envaccord.com
info@envaccord.com

ATTENDANCE

EnvAccord

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

S/N	Name	Company	Designation	Phone Number	Signature
1	Eng. Suleiman Adamu	EMEA	EMIR PALACE	0813111111	
2	Lois	EMEA	EMIR PALACE	0813111111	
3	Abdul	EMEA	EMIR PALACE	0813111111	
4	Abdul	EMEA	EMIR PALACE	0813111111	
5	Abdul	EMEA	EMIR PALACE	0813111111	
6	Umar	EMEA	EMIR PALACE	0813111111	
7	Sani	EMEA	EMIR PALACE	0813111111	
8	Eng. Umar	EMEA	EMIR PALACE	0813111111	
9	Abdul	EMEA	EMIR PALACE	0813111111	
10	Abdul	EMEA	EMIR PALACE	0813111111	

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



ENVIRONMENTAL ACCORD NIGERIA LIMITED 11A, Spectrum District, Ikeja Phase II, Lagos 101248, NIGERIA. TEL: 01-261-9991 info@envaccord.com www.envaccord.com		ATTENDANCE			
Project Title: ENVIRONMENT AND SOCIAL DUE DILIGENCE FOR THE KANO-MARADI RAILWAY PROJECT					
Purpose/Activity: JOINT MEETING WITH THE MINISTRY OF ENVIRONMENT AND MINISTRY OF LANDS AND SURVEY					
Date: 13/02/24					
Venue: MINISTRY OF ENVIRONMENT, KATSINA					
S/N	Name	Community	Designation	Phone Number	Signature
1	Mr. Yusuf GIDE	KATSINA	HC	0903554100	[Signature]
2	Mr. Yusuf GIDE	KATSINA	HC	0903554100	[Signature]
3	Mr. Yusuf GIDE	KATSINA	HC	0903554100	[Signature]
4	Mr. Yusuf GIDE	KATSINA	HC	0903554100	[Signature]
5	Mr. Yusuf GIDE	KATSINA	HC	0903554100	[Signature]
6	Mr. Yusuf GIDE	KATSINA	HC	0903554100	[Signature]

NIGRA SEP ATTENDANCE LIST KAMA PROJECT SUSTAINABILITY (S2)							
General Information							
Date:	14 March 2024						
Location of Meeting (Community, District):	Ministry of Environment, KATSINA STATE						
Purpose of Engagement:	E-S's DUE DILIGENCE						
Number of Attendees:	20 (Twenty)						
Name of Person Recording Attendance:	ADOLUWA OLUKOTUN (KAMA)						
Attending Stakeholders							
S/N	First Name	Surname	Sex (M/F)	Area of Residence (Community, District)	Position	Contact Details (Telephone, Email)	Signature
1	Yusuf	GIDE	M	KATSINA	HC	0903554100	[Signature]
2	Yusuf	GIDE	M	KATSINA	HC	0903554100	[Signature]
3	Yusuf	GIDE	M	KATSINA	HC	0903554100	[Signature]

Discussions with MoEnv and Ministry of Lands and Survey, Katsina

Discussions with MoEnv and Ministry of Lands and Survey, Katsina

NIGRA SEP ATTENDANCE LIST KAMA PROJECT SUSTAINABILITY (S2)							
General Information							
Date:	13/02/24						
Location of Meeting (Community, District):	Ministry of Environment, KATSINA STATE						
Purpose of Engagement:	E-S's DUE DILIGENCE						
Number of Attendees:	20 (Twenty)						
Name of Person Recording Attendance:	ADOLUWA OLUKOTUN (KAMA)						
Attending Stakeholders							
S/N	First Name	Surname	Sex (M/F)	Area of Residence (Community, District)	Position	Contact Details (Telephone, Email)	Signature
1	Yusuf	GIDE	M	KATSINA	HC	0903554100	[Signature]
2	Yusuf	GIDE	M	KATSINA	HC	0903554100	[Signature]
3	Yusuf	GIDE	M	KATSINA	HC	0903554100	[Signature]
4	Yusuf	GIDE	M	KATSINA	HC	0903554100	[Signature]
5	Yusuf	GIDE	M	KATSINA	HC	0903554100	[Signature]
6	Yusuf	GIDE	M	KATSINA	HC	0903554100	[Signature]

NIGRA SEP ATTENDANCE LIST KAMA PROJECT SUSTAINABILITY (S2)							
General Information							
Date:	13/02/24						
Location of Meeting (Community, District):	Ministry of Environment, KATSINA STATE						
Purpose of Engagement:	E-S's DUE DILIGENCE						
Number of Attendees:	20 (Twenty)						
Name of Person Recording Attendance:	ADOLUWA OLUKOTUN (KAMA)						
Attending Stakeholders							
S/N	First Name	Surname	Sex (M/F)	Area of Residence (Community, District)	Position	Contact Details (Telephone, Email)	Signature
1	Yusuf	GIDE	M	KATSINA	HC	0903554100	[Signature]
2	Yusuf	GIDE	M	KATSINA	HC	0903554100	[Signature]
3	Yusuf	GIDE	M	KATSINA	HC	0903554100	[Signature]
4	Yusuf	GIDE	M	KATSINA	HC	0903554100	[Signature]
5	Yusuf	GIDE	M	KATSINA	HC	0903554100	[Signature]
6	Yusuf	GIDE	M	KATSINA	HC	0903554100	[Signature]

Discussions with MoEnv and Ministry of Lands and Survey, Katsina

Discussions with MoEnv and Ministry of Lands and Survey, Katsina





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