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STAKEHOLDER ENGAGEMENT PLAN

**KANO-MARADI SINGLE TRACK STANDARD GAUGE RAILWAY LINE
10001-NIG.KAMA- MENG-SU-PLN-000857 – REV02 | Date:10/07/2024**



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Abbreviations and Acronyms

Abbreviation / Acronym	Definition
AfCFTA	African Continental Free Trade Area
AfDB	African Development Bank
Aol	Area of Influence
BID	Background Information Document
CGM	Community Grievance Mechanism
CLO	Community Liaison Officer
CLT	Community Liaison Team
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
FGN	Federal Government of Nigeria
FME _{env}	Federal Ministry of Environment
FMoT	Federal Ministry of Transportation
IAPs	Interested and Affected Parties
ICP	Informed Consultation and Participation
IFC	International Finance Corporation
IFC PS	International Finance Corporation Performance Standards
ISS	Integrated Safeguards System
GRM	Grievance Response Mechanism
LGA	Local Government Authorities
MENG	Mota-Engil Engenharia e Construcao Nigeria, a.k.a Mota-Engil Nigeria
NEAO	National Environmental Assessment Office
NGO	Non-Governmental Organisation
PACs	Project Affected Communities
PAPs	Project Affected Parties
PM	Project Manager
RAP	Resettlement Action Plan
REIES	Rapport D'Etude D'Impact Environnemental et Social)
RF	Resettlement Framework
SEP	Stakeholder Engagement Plan
SGR	Standard Gauge Rail

EXECUTIVE SUMMARY

The Kano-Maradi Single Track Standard Gauge Railway Line (KAMA Rail Project) is a major infrastructure initiative by the Federal Government of Nigeria, through the Federal Ministry of Transportation, with Mota-Engil Nigeria as the contractor. The project involves constructing a 393 km railway line from Kano, Nigeria, to Maradi, Niger, and a 102 km branch line from Kano to Dutse in Jigawa State. This railway aims to enhance economic activities, industrial growth, and public transportation in Northern Nigeria and Niger, supporting the African Continental Free Trade Area (AfCFTA) agreement.

The project will involve temporary works, installation of railway tracks, construction of bridges, stations, ancillary buildings, and installation of mechanical, electrical, and telecommunication systems. The project's Area of Influence (AoI) covers impacts related to transportation, construction, labor, noise, and pollutants, affecting Jigawa, Kano, Katsina States, and Maradi in Niger.

The Stakeholder Engagement Plan (SEP) outlines principles and objectives for engaging relevant stakeholders, ensuring their interests, opinions, and aspirations are respected. It emphasizes collaboration, timely responses, proactive communication, and inclusiveness. The SEP aims to identify stakeholders, distribute accurate information, form partnerships, manage conflicts, record and address concerns, manage expectations, and comply with Nigerian, Nigerien, and international standards.

Engagement methods include workshops, forums, focus groups, and meetings, ensuring accessibility and inclusivity. A robust grievance mechanism addresses concerns and complaints, designed to be culturally appropriate, easily accessible, and provide timely feedback.

1 INTRODUCTION

The Kano-Maradi Single Track Standard Gauge Railway Line (KAMA Rail Project) is a strategic infrastructure initiative undertaken by the Federal Government of Nigeria (FGN) through the Federal Ministry of Transportation (FMoT), with the appointed contractor Mota-Engil Nigeria (MENG). The project aims to construct a 393 km railway line from Kano in Nigeria to Maradi in the Republic of Niger, including a 102 km branch line connecting Kano with Dutse in Jigawa State. This project is poised to enhance economic activities, industrial growth, and public transportation in Northern Nigeria and Niger, supporting the African Continental Free Trade Area (AfCFTA) agreement.

For the purposes of the project design the route has been broken down into nine sections based on the country and branch line the route will traverse. These sections are described in Table 1-1.

Table 1-1: Sections of the Proposed Kano to Maradi Railway

Route	Section	Route Chainage Section (km) (Direction: East to West)	Description
Dutse to Kano (Branch line)	Section 07, 08 and 09	0 – 98.5	<p>This section is the branch line running for 98.5 km from Dutse to Kano in Jigawa State, Nigeria. This route will connect Dutse with the main rail line (Kano to Maradi). This route will also connect the rail to a planned railway line to Lekki Port, Lagos.</p> <p>Four stations will be constructed in this section: YarGaya, Gaya, Wudil, and Dutse. A fifth station is predicted for long term (Duru). A total of 18 road overbridges, 14 railway bridges and 9 road underpasses and culverts will be constructed along this section.</p> <p>A worker’s construction camp and laydown areas will be located in Wudil.</p> <p>This section traverses the states Kano and Jigawa, running through predominantly agricultural areas. This route also traverses the north of the Shakwadina forest reserve.</p> <p>This section crosses the Kano-Zaria Highway various roads and waterbodies, most rivers (Hadejia River twice), and Dangora-Tamburawa Powerline and Kaduna-Kumbotso Powerline, and affects a Gas Service Station.</p> <p>A few buildings including the Capital City University is located within the permanent RoW.</p>
Kano to Dawanau	Section 01	0 – 24.0	<p>This section is located in Nigeria, starting west of the city of Kano running north for 24 km to the state of</p>

Route	Section	Route Chainage Section (km) (Direction: East to West)	Description
			<p>Dawanau.</p> <p>The stations Kano and Dawanau will be constructed in this section. It should be noted Kano station will be constructed under a separate contract and therefore, is not included as part of the funded Project. The Kano station is considered to be an Associated Facility as the use of this station will be required during operation for the Project.</p> <p>The railway alignment predominately will avoid Bayero University area, Janguza Army Area and interference with High Voltage powerlines</p> <p>The railway alignment will cross Watari River and Gwarzo/Kano Road.</p> <p>Two main grains markets are located along this stretch: Zawaciki grains market and Dawanau grains market (one of the largest in Africa).</p> <p>A few buildings, businesses and schools are located within the permanent RoW.</p>
Dawanau to Kazaure	Section 02	24.0 – 88.5	<p>In Dawanau, the route runs almost in parallel to the west of the A2 road, continuing northwards until it reaches the city of Daura, passing west of the city of Kazaure.</p> <p>Two stations will be constructed in this section: Dambatta and Kazaure. A third station is predicted for long term (Kunya).</p> <p>One camp and laydown area will be constructed in Kazaure.</p> <p>This route passes through the towns Kazaure and runs through predominantly agricultural land and grazing areas.</p> <p>This route crosses west of the Baba Ruga dam, an area with intensive grazing areas for cattle and irrigation. Further north, this route traverses the south of the Gasartani forest reserve.</p> <p>A few buildings, businesses and schools are located within the permanent RoW. Eight burial grounds are located within the RoW of this section, with the</p>

Route	Section	Route Chainage Section (km) (Direction: East to West)	Description
			exception of the Tumfafi graveyard located immediately west of Dawanau station.
Kazaure to Daura	Section 03	88.5 – 130.5	<p>This section continues to run almost in parallel to the west of the A2 road, continuing northwards until it reaches the city of Daura, passing west of the city of Kazaure. The Line then turns westwards, south of Daura.</p> <p>One station will be constructed in this section: Daura. A second station is predicted for long term (Durbe)</p> <p>The route passes the towns Kazaure and Daura. This route traverses the eastern tip of the Gwiwa Korel forest reserve and north of Daura Forest reserve –A school (forming part of the Sabuwura Jawo local community) is located within the RoW.</p>
Daura to Jibia	Section 04 and 05	130.5 – 229.5	<p>From the south of Daura and, after crossing the Katsina-Daura Road, this section runs parallel to the road in a westerly direction until it reaches Jibia, crossing the cities of Mashi and Katsina. One worker's construction camp and laydown area will be constructed in Katsina.</p> <p>The route passes the towns Mashi, Shargalle, Katsina and Jibia. Tsamga (near Jibia) is an international stock route.</p> <p>Four stations will be constructed along this stretch: Shargalle, Mashi, Katsina and Jibia. A fifth and sixth station is predicted for long term (Muduru and Daddara).</p> <p>This section crosses two forest reserves: north of Damangu and the centre of Nasarawa.</p>
Jibia to Maradi	Section 06	222.5 – 284.500	<p>From Jibia, the route crosses the Nigeria-Niger Republic border and curves northwards, running parallel to the existing road to reach Maradi where it terminates.</p> <p>One station is located in this section: Maradi. A second station is predicted for long term (Dan Issa/ Anoa Mata).</p> <p>The route passes an international cattle stock area located in proximity to the Nigeria-Niger Republic border.</p>

Route	Section	Route Chainage Section (km) (Direction: East to West)	Description
			The railway alignment traverses a predominantly agricultural area.

1.1 PROJECT OVERVIEW

The selected railway route starts from Kano, running northwards and passing through significant towns and cities including Dambatta, Kazaure, Daura, Mashi, Katsina, and Jibiya before reaching Maradi. The project will establish 13 stations along the main and branch lines, facilitating both passenger and freight transportation. The projected traffic volume is approximately 4684 passengers per day in each direction and 1536 tonnes of freight daily from Kano to Maradi, with a reciprocal freight volume from Maradi to Kano.

1.2 STAKEHOLDER ENGAGEMENT PRINCIPLES AND OBJECTIVES

Recognizing the importance of effective stakeholder engagement, FMoT with MENG, has developed this Stakeholder Engagement Plan (SEP) to guide communication with all relevant stakeholders throughout the project's lifecycle. The key principles include transparency, accountability, inclusivity, responsiveness, and collaboration. The SEP's objectives are to identify relevant stakeholders, distribute accurate project information, promote constructive interactions, record and address public concerns, manage expectations, and ensure compliance with Nigerian, Nigerien, and international standards.

2 PROJECT DESCRIPTION

2.1 PROJECT ACTIVITIES

The Project involves the design, construction and operation of a new rail line from Kano through Jigawa, Katsina and Maradi. The rail line construction activities will involve:

- Temporary works (preparation and earthworks) and tracks for construction (60 width ROW);
- Installation of ballast and railway tracks;
- Construction of structures including bridges, over and under passes, and culverts;
- Construction of ten (10) stations along the Main Line and three (3) stations on the Branch Line;

Table 2-1 Kano-Maradi Rail Stations types and locations

S/N	Duration	Section	Station	Type	Station	Freight Yard	Maintenance Center	Loco Depot and Light Maintenance	Washing Station and Coach Servicing	Refuelling Point for Locos
1		S01	DAWANAU	Type B2	X	X	-	-	-	-
2	Long Term	S02	KUNYA	Type B2	-	-	-	-	-	-
3		S02	DAMBATTA	Type B1	X		-	-	-	-
4		S02	KAZAURE	Type B1	X	X	X			
5	Long Term	S03	DURBE	Type B2	-	-	-	-	-	-
6		S03	DAURA	Type B1	X	X	-	-	-	-
7		S04	SHARGALLE	Type B2	X	-	-	-	-	-
8		S04	MASHI	Type B2	X	-	-	-	-	-
9	Long Term	S05	MUDURU	Type B2	-	-	-	-	-	-
10		S05	KATSINA	Type A	X	X	X	X	X	X
11	Long Term	S05	DADDARA	Type B2	-	-	-	-	-	-
12		S05	JIBIYA	Type B2	X	X	-	-	-	-
13	Long Term	S06	ANOAL MATA	Type B2		-	-	-	-	-
14		S06	MARADI	Type B2	X	-	-	-	-	-
15		S07	YAR GAYA	Type B2	X	-	-	-	-	-
16		S08	WUDIL	Type B2	X	-	-	-	-	-
17		S09	GAYA	Type B2	X	-	-	-	-	-
18	Long Term	S09	DURU	Type B2	-	-	-	-	-	-
19		S09	DUTSE	Type A	X	X	X	X	X	X

- Construction of ancillary buildings to support equipment for the operation of the rail (locomotive depot and light maintenance, washing stations and coach servicing, refuelling points for locomotives, freight yard, integrated maintenance centre);
- Installation of mechanical and electrical equipment; and
- Installation of signaling and telecommunication systems.

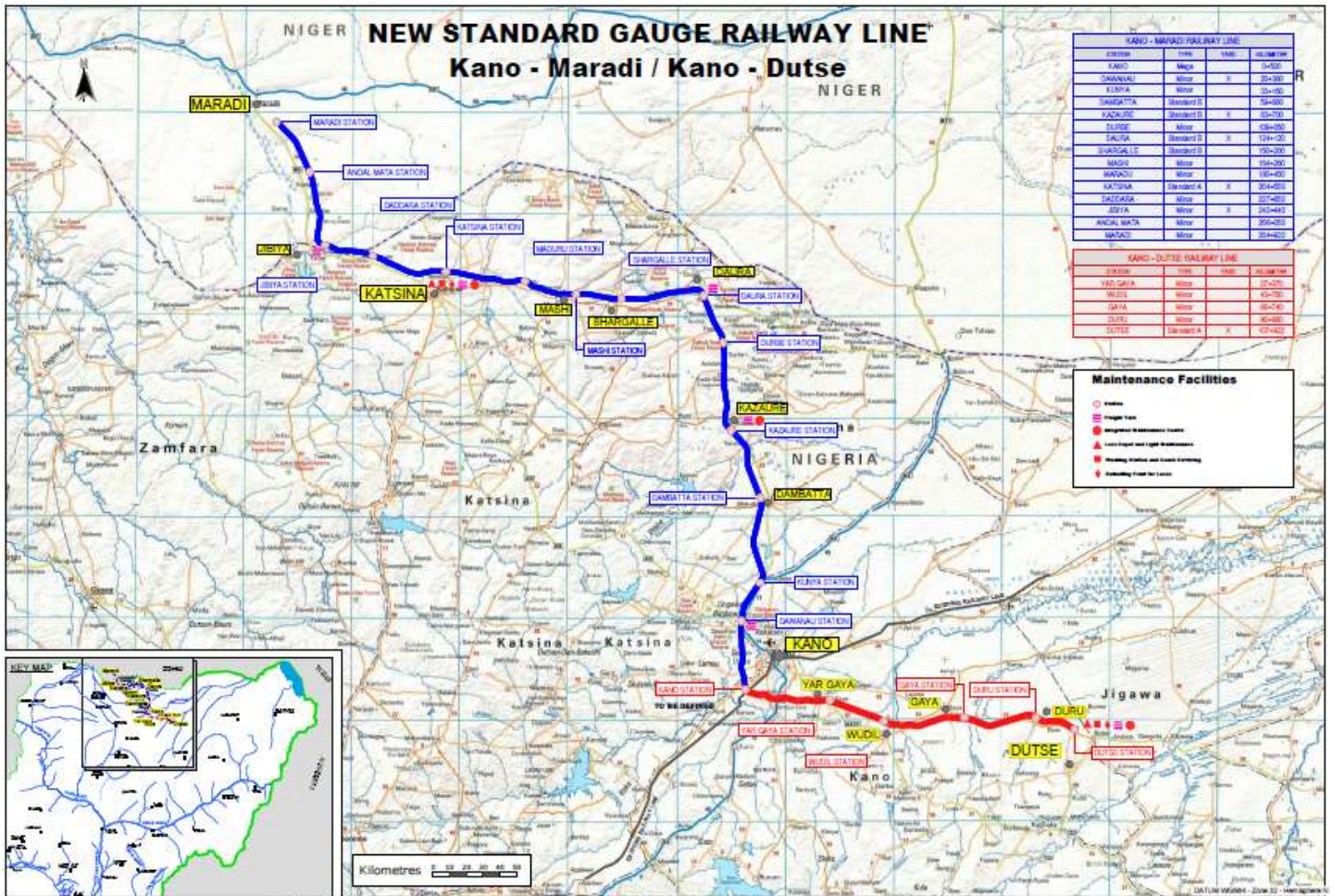
2.2 AREA OF INFLUENCE

The Area of Influence (Aoi) has been determined by considering the impacts related to Project activities such as transportation of materials, equipment and personnel, construction works, labour hire, and noise and air pollutants generated during the construction and operation phase of the Project. The IFC and AfDB ISS requires that an Environmental and Social Impact Assessment (ESIA) be carried out to cover the Project's Aoi and associated facilities.

The Project corridor traverses three federal states in Nigeria, namely Jigawa, Kano and Katsina States including twenty (20) Local Government Authorities LGAs, and Maradi in the Republic of Niger. These are areas affected either directly or indirectly by the project and its activities. The areas with direct interaction with the project activities are areas directly impacted in the project area. Beyond the communities adjacent the route, other areas and places will be indirectly impacted by the Project.

The Project Aoi is presented in the 9 figures in Annex 1, 5 km either side of rail line and stations (considered for the ESIA SEP and ESIA Cultural Heritage).

Figure 2-1- Project Alignment Map



2.3 PROJECT PHASES

The project started on August 2022, and considering the last updates will be concluded in December 2025. The project schedule is detailed in the Program of Works (POW) in attached (Annex 2).

Construction Phase: This involves the preparation of sites, construction of rail line sections, stations, bridges, and other necessary infrastructure. Employment during this phase is projected to peak at 6500 workers, primarily Nigerian nationals.

This phase will involve the preparation and setting up of sites for the construction of the rail line. It includes the construction/ use of several components including borrow pits, quarries, rail line sections, camps and laydown areas, train stations, utilities, water collection holes, access roads, bridges and over and underpasses, canals and safe houses. At the time of developing this SEP the access roads, canals, and safe houses were still undergoing final engineering design.

During project construction, camps will be provided for the workers on-site, which will have facilities to

meet the essential needs of the workers. The camps will also have laydown areas that will be used for the collection, temporary storage, and the assembly of construction equipment and supplies. Camp sites have been designed for construction in three areas, namely: Kazaure, Katsina and Wudil. The camp sites will comprise security points, sanitary facilities, clinics, canteen halls, offices, control rooms, laboratories, equipment areas and houses.

The main E&S risks that require stakeholder engagement in the construction phase are:

- Injury to community members from construction site trespass, exposure to hazardous construction materials, or road traffic accidents with construction vehicles
- Transmission of communicable diseases and STDs from Project workers to local communities
- Increased transmission of malaria
- Increased use of local health care services.
- Inappropriate behaviours of project workers, including risk of gender-based violence, sexual exploitation and abuse
- Acts of banditry, criminality, kidnapping and terrorism targeted at the Project construction activities, equipment, and workforce
- Risk of excessive force or inappropriate behaviours used by security personnel employed by the project
- Community safety risk from the increased presence of public security personnel that are deployed to protect the Project during construction
- Exacerbation of land and resource-based conflict arising from land acquisition and disruption to pastoralism / grazing routes
- Creation of intra-community tensions and conflict due to perceived inequalities in employment opportunities and resettlement compensation

Operation Phase: Upon completion, the railway will operate with trains running at commercial speeds of 50 km/h for freight and 70 km/h for passengers. This phase includes maintenance and operational activities.

The design parameters predicted in the Preliminary Design are as following:

- Max. Design Speed - Passenger Local trains 120 (km/h)
- Max. Design Speed - Heavy freight trains 80 km/h

This phase includes maintenance and operational activities.

During the operational phase the main E&S risks that require stakeholder engagement are:

- Injury to community members from accidents when crossing the railway
- Inappropriate behaviours of project workers and risk of gender-based violence, sexual exploitation and abuse
- Acts of banditry, criminality, kidnapping and terrorism targeted at the stations and train
- Risk of excessive force or inappropriate behaviours used by security personnel employed by the project
- Community safety risk from the increased presence of public security personnel that are deployed to protect the Project, including at stations
- Community safety risk arising from the facilitation of or disruption to illicit trade, smuggling and people

trafficking in the border regions

Decommissioning Phase: Although the project is designed for long-term operation, a decommissioning phase will be planned to ensure safe and responsible closure when necessary.

3 POLICY, LEGAL, AND ADMINISTRATIVE FRAMEWORK

The SEP ensures compliance with national and international regulations, including Nigeria's Environmental Impact Assessment (EIA) process and Niger's Environmental and Social Impact Assessment (ESIA) requirements. Additionally, it adheres to the African Development Bank's (AfDB's) Integrated Safeguards System (ISS), which emphasizes stakeholder engagement and sustainable project implementation, specifically focusing on Stakeholder Engagement and Information Disclosure (E&S OS 10).

Table 3-1 Nigerian Policy and Laws

Policy, Laws	Details
National Policy on Environment	The Federal Government of Nigeria formulated the National Environmental Policy in 1989 and launched the document in 1991. It was first revised in 1999 and later in 2016. The goal of the National Policy on the Environment is to 'ensure environmental protection and the conservation of natural resources for sustainable development. The document includes guidelines for achieving sustainable development in fourteen vital sectors of the nation's economy. These include land use and soil conservation, water resources management, wildlife and protected natural areas, waste management, energy production, and air pollution, among others. The policy document is aimed at promoting good environmental practices through environmental awareness and education, most of which are relevant to the project. In addition, there are national policies applicable to the proposed rail development project and the most pertinent is the National Transport Policy.
National Transport Policy 2010	The fundamental goal of the National Transport Policy 2010 is to develop an adequate, safe, environmentally sound, efficient and affordable integrated transport system within the framework of a progressive and competitive market economy in Nigeria. The objectives of the policy are: <ul style="list-style-type: none"> • to promote economic development, expand trade and improve Nigeria's competitiveness through an efficient and affordable transport system; • to encourage and remove all barriers towards the private sector participation in the development, provision, maintenance, operation and upgrading of transport infrastructure and services; • to promote the use of public transport over private cars; • to promote a culture of maintenance and continuous upgrading of transport services in Nigeria; • to improve the safety, security, reliability, quality, and speed of movement of goods and people at local, national and international levels; • to develop transport infrastructure that ensures environmental sustainability and internationally-acceptable standards;

Policy, Laws	Details
	<ul style="list-style-type: none"> to support states and the Federal Capital Territory in the development and promotion of urban transport systems and local governments in developing and promoting rural accessibility. <p>The primary goal of the Transport Policy for the rail transportation sub-sector is to transform the rail system from its present condition to an efficient, flexible and competitive mode. To achieve its goal, the Federal Government of Nigeria will carry out:</p> <ul style="list-style-type: none"> Rehabilitation of the existing railway infrastructure Concession the existing rail lines Moderation and expansion of the rail network to link all seaports and international airports, key industrial and economic centres, among others. <p>In addition, recent investment in the transport sector has been guided by two major policy documents – the Nigeria Integrated Infrastructure Master Plan (NIIMP), which runs from 2014 until 2043; and the Economic Recovery and Growth Plan (ERGP); a mid-term macroeconomic development agenda covering the period from 2017 to 2020. NIIMP is a broad infrastructure roadmap intended to strengthen multi-modal linkages, as well as institutional, legal and policy frameworks, to enhance key project delivery. Its transportation portfolio covers all segments, including rehabilitation of existing rail lines in Nigeria and construction of new tracks.</p>
National Environmental and Social Legislations and Regulations	There are environmental and social regulations pertinent to the proposed Kano-Maradi rail development project. In addition to some international environmental safeguard polices, treaties and conventions, key national regulations which are germane to the project are the Environmental Impact Assessment (EIA) Act Cap E12 LFN 2004; The Land Use Act Cap L5, LFN 2004 and Nigerian Urban and Regional Planning Act CAP N138, LFN 2004.
Environmental Impact Assessment (EIA) Act Cap E12 LFN 2004	<p>The EIA Act Cap E12 LFN 2004 (formerly known as EIA Decree No. 86 of 1992) makes Environmental Impact Assessment mandatory for all new major public and private projects in Nigeria. The Act sets out the general principles, procedures and methods of EIA in various sectors, and it gives specific powers to the FMEEnv to facilitate environmental assessment of projects. Specifically, Section 1 of the Act states that the objectives of any environmental impact assessment shall be:</p> <ul style="list-style-type: none"> Consider the likely impacts and the extent of these impacts on the environment before embarking on any project or activity. To establish, before a decision is taken by any person, authority, corporate body or unincorporated body including the government of the federation, state or local government intending to undertake or authorise the undertaking of any activity that may likely or to a significant extent affect the environment or have environmental effects, the extent of the effects of these activities on the environment. To promote the implementation of appropriate policy in all federal lands, states, and local government areas, consistent with all laws and decision-making processes through which the goals and objectives in paragraph (i) of this section may be realized. To encourage the development of procedures for information exchange, notification and consultation between organs and persons when proposed activities are likely to have significant environmental

Policy, Laws	Details
	<p>effects on boundary or on the environment of border towns or villages.</p> <p>To achieve these objectives, the Act stipulates that no public or private sector of the economy shall undertake or embark on any project without first carrying out an EIA study. The proposed Kano-Maradi rail line project is a fundamental development project that is expected to, in addition to its key potential benefits, adversely impact on the environment. Therefore, full compliance with the EIA Act is required. The EIA guidelines (procedural and sectoral) issued by the FMEEnv apply to all project activities for the development of this project.</p>
<i>The Land Use Act Cap L5, LFN 2004</i>	<p>The Land Use Act of 2004 CAP L5 (formerly Land Use Decree No. 6 of 1978), the Constitution of 1999 and the Public Lands Acquisition Laws of the States of the Federation make up the governing policy for land acquisition in Nigeria and these enable the State to acquire land (that is, to abrogate leases and other authorizations to occupy land). The Act vests all land in each State of the Federation (except land already vested in the Federal Government of Nigeria or its agencies) in the Governor of the State. It makes the State Government the authority for allocating land in all urban areas for residential, agricultural, commercial and other purposes, while it confers similar powers regarding non-urban areas on the local governments in such cases. The Governor of a State can revoke a right of occupancy for overriding public interest. The right for building of residential and other structures, farmlands, and shrines for traditional worship, among others, are rights permitted under Section 51 of the Land use Act.</p>
<i>National Environmental Standards & Regulations Enforcement Agency (NESREA) Act, 2007</i>	<p>The following National Environmental Standards and Regulations Enforcement Agency (NESREA) regulations are related to the rail line project:</p> <p><u>National Environmental (Sanitation and Wastes Control) Regulations, S. I. No. 28 of 2009:</u> The purpose of this regulation is to provide the legal framework for the adoption of sustainable and environment friendly practices in environmental sanitation and waste management to minimize pollution during project implementation.</p> <p><u>National Environmental (Noise Standards and Control) Regulations, S. I. No. 35 of 2009:</u> The main objective of the provisions of this regulation is to ensure serenity of the human environment or surrounding and their psychological well-being by regulating noise levels, which could be impacted by anthropogenic or industrial activities.</p> <p><u>National Environmental (Soil Erosion and Flood Control) Regulations, S. I. No. 12 of 2011:</u> The objective of this regulation is to control all earth-disturbing activities, practices or developments for non-agricultural, commercial, industrial and residential purposes.</p> <p><u>National Environmental (Construction Sector) Regulations, S. I. No. 19 of 2011:</u> The purpose of this regulation is to prevent and minimize pollution of the Nigerian environment from the impacting activities of construction, decommissioning and demolition activities.</p> <p><u>National Environmental (Surface and Groundwater Quality Control) Regulations, S. I. No. 22 of 2011:</u> The National Regulations on Surface and Groundwater Quality Control are intended to restore, enhance, and preserve the physical, chemical and biological integrity of the nation's water resources, and to maintain existing water uses.</p> <p><u>National Environmental (Electrical/Electronic Sector) Regulations, S. I. No. 23 of 2011:</u> The main objective of this regulation is to ensure that best practices are applied in order to safeguard the Nigerian environment against pollution hazards from Waste Electrical and Electronic Equipment that may be deployed for use especially at the operation phase of the Kano-Maradi rail project.</p>

Policy, Laws	Details
<i>Nigerian Urban and Regional Planning Act CAP N 138, LFN 2004</i>	<p>The Urban and Regional Planning Act is aimed at overseeing realistic, purposeful planning of the country to avoid overcrowding and poor environmental conditions. In this regard, the following sections apply:</p> <ul style="list-style-type: none"> • Building and construction plan must be drawn and submitted for approval (Section 30 (3)). <p>Planting of trees for environmental conservation (Section 72)</p>
<i>Harmful Waste (Special Criminal Provisions) Act Cap H1 LFN 2004</i>	<p>The Harmful Waste (Special Criminal Provisions) Act 1988 now Cap H1 LFN of 2004 prohibits activities relating to harmful wastes; and these include the carrying, depositing and dumping of harmful waste on any land and territorial waters of Nigeria, contiguous zone or Exclusive Economic Zone of Nigeria or its inland waterways. The Act, without prejudice to the provisions of the Customs, and Excise Tariff, among others enactments, or law, prohibits all activities relating to the purchase, sale, and importation. The proposed project will generate some hazardous wastes during construction phase. These include oil waste and related materials like oily rags, filters and spent lead acid batteries during repair and or maintenance of construction equipment and vehicles. This waste requires proper handling and disposal in accordance with the applicable requirements of this Act.</p>
<i>The Endangered Species Act, CAP E9, LFN 2016</i>	<p>This Act (formerly known as Endangered Species Act Cap E9, LFN 2004 now revised) focuses on the protection and management of Nigeria's wildlife and some of their species in danger of extinction because of over exploitation. The following sections are important to the project:</p> <ul style="list-style-type: none"> • Section 1 prohibits, except under a valid license, the hunting, capture or trade in animal species, either presently or likely, in danger of extinction. • Section 5 defines the liability of any offender under this Act. • Section 7 provides for regulations to be made necessary for environmental prevention and control as regards the purposes of this Act. <p>Certain sections of the line route of this project will pass through natural areas that serve as wildlife habitats, which will be impacted by the project. Hence, the project activities shall be carried out to comply with major provisions of this Act.</p>
<i>Labour Act, Cap L1, Laws of the Federation of Nigeria 2004</i>	<p>This Act is the principal and most direct legislation on employment matters in Nigeria. It is a piece of legislation, which seeks to protect the employment rights of individual workers and it includes matters such as classification of worker types, wages, contracts, employment terms and conditions, and recruitment. Additional legal frameworks for labour administration in Nigeria are:</p> <ul style="list-style-type: none"> • Trade Disputes Act, Cap T8, LFN, 2004 • Trade Disputes (Essential Services) Act, Cap T9, LFN, 2004 • Trade Unions (Amended) Act, 2005. • National Minimum Wage Act, 2019 • Employment Compensation Act, 2010 • ILO Conventions, Recommendations and Protocols
<i>National (Public) Health Act 2014</i>	<p>In Nigeria, the Public Health Law such as the Nigeria National Health Act 2014 provides justification for the execution of developmental projects under guidelines that promote health by protecting the environment and safeguarding humans' health. The Public Health Laws empower Medical Officers of Health (operating at the local government council, under the supervision of the State and Federal Ministries) to ensure the promotion of good health.</p>

Policy, Laws	Details
The Water Resources (Amendment) Act, 2004	<p>This Water Resources Act Cap. W2, Laws of the Federation of Nigeria 2004 (now Water Resources (Amendment) Act, 2016 is an Act of the Parliament of the Federal Republic of Nigeria. This Act vests the right to use and control all surface and groundwater and all water in any watercourse affecting more than one state, together with the banks and beds thereof, in the Federal Government, which shall promote planning, development and use of Nigeria's water resources; coordinate activities likely to influence the quality, quantity, use, distribution and management of water. Also, the federal government under the Act, shall apply appropriate standards and techniques for use, and protection.</p>
Other Applicable Legislations and Policies	<ul style="list-style-type: none"> • Africa Development Bank Safeguards • Basel Convention on Trans-Boundary Movement of Hazardous Wastes and their Disposal, • Climate Change Act 2021 • Employee Compensation Act of 2010 • Environmental Impact Assessment Sectoral Guidelines for Infrastructures 1995. • Fire Service Act 1981 • Kano State Environmental Pollution Control law of 2022 • Kyoto Protocol, • National Environmental Health Practice Regulation act 27 of 2016, • National Environmental Protection (Management of Solid and Hazardous Waste) Regulation, FEPA/FMEnv S.1.15 (1991) • National Inland Waterways Act • National Policy on Occupational Safety and Health, 2016 • Natural Resources Conservation Act CAP 286 LFN 1990 • Nigerian Energy Transition plan (2022) • Paris Agreement, • Penal Code Act CAP 53 LFN, 2008 • Public Health Law Cap 103 LFN 1990 • United Nations Framework Convention on Climate Change (1992)
State Environmental Regulations and Laws	<p>In accordance with Section 24 of the defunct FEPA Act, Chapter 131 of the Laws of the Federal Republic of Nigeria, 1990, the State Environmental Protection Edicts were enacted. The Edict empowers the State Environmental Protection Agencies (SEPA) to establish such environmental criteria, guidelines/specifications, or standards for the protection of the state's air, lands and waters as may be necessary to protect the health and welfare of the people. The functions of SEPA among others include:</p> <ul style="list-style-type: none"> • Routine liaison and ensuring effective harmonization with the FMEnv in order to achieve the objectives of the National Policy on the Environment. • Co-operate with the FMEnv and other related regulatory agencies in the promotion of environmental education. • Be responsible for monitoring compliance with waste management standards; and • Monitor the implementation of the EIA and Environmental Audit Report (EAR) guidelines and procedures on all developmental policies and projects within the State.

Policy, Laws	Details
	All the state's environmental protection issues, with respect to this project, are under the supervision of Jigawa, Kano and Katsina States Ministries of Environment and their agencies.
State Land Legislations	<p><i>a. Kano State Land Laws, Regulations, and Institutions</i></p> <p>The Kano State Bureau for Land Management office is responsible for the management of land in Kano State. Kano State has a Land Use Act, which was developed in 2016 to empower the state Bureau for Land Management for the management of land in the State. The Bureau's mandate is to strengthen land administration (acquire, prepare land documents, allocate and register all land transactions), physical planning of non-urban centers in the State, land acquisition, compensation, and management of land conflict. Kano State Ministry of Physical Planning is also a regulatory body which has a major stake in this project with respect to land acquisition and land use.</p> <p><i>b. Katsina State Land Laws, Regulations, and Institutions</i></p> <p>Katsina State Ministry of Land, Survey and Environment is the major body responsible for land advisory, land allocation and certification, resettlement, and implementation of land policies in the State. However, Katsina Urban Planning and Development Authority (KUPDA) is a subsidiary of the ministry that deals with land issues and developmental structures in urban cities. The local government has land departments responsible for certifying land ownership prior to confirmation from the State ministry, which shows legal possession of land by individuals in the State.</p> <p><i>c. Jigawa State Land Laws, Regulations, and Institutions</i></p> <p>Jigawa State in 2021 enacted the Jigawa Land Use Act. The Jigawa State Ministry of Land and Survey and the Ministry of Urban and Regional Planning are responsible for making policies and laws regarding land ownership in Jigawa State. These agencies are responsible for processing certificates of ownership, the statutory certificate for intending landowners, enumeration, and compensation. A land advisory committee is also set at the local government level to advice on land-related matters. The committee comprises representatives from the traditional leaders, ministry of Agriculture, Ministry of Environment (land department), security agencies and religious leaders.</p>
Local Government Areas Byelaws on Environmental Health	The route of the proposed rail line project passes through 18 local governments across the three states. The Byelaws on Environmental Health and Sanitation of the Local Government Authorities, which ensure environmental management, protection and cleanliness for the general well-being of the people in the LGAs, are in place. The LGAs, through its Environmental Health Officers are also responsible, in collaboration with other agencies of government in the states, for the implementation of water and sanitation law.

• **NIGER REGULATIONS**

The specific requirements on information and consultation in the Environmental and Social Impact assessment (ESIA) process in Niger are included in Law 2018-28 of 14 May 2018. Article 22 requires that project proponents effectively and continuously engage people and communities affected by potential projects to ensure that issues or concerns relating to the Project are addressed in the design and implementation of projects. Proponents are required to engage all impacted and influencing stakeholders, including potentially affected communities, competent national and local authorities, NGOs, civil society organizations civil society and other groups at the appropriate stages of the project. Other key legislation relating to public participation includes:

Table 3-2 Nigerien Policy and Laws

Policy, Laws	Details
Law No. 98-56 of December 29, 1998	on the framework law relating to environmental management;
Law No. 61-37 of November 24, 1961	regulating expropriation for public utility and temporary occupation, amended and supplemented by Law No.2008-37 of July 10, 2008;
Decree No. 2019-027/PRN/MES U/DD of January 27, 2019	determining the terms of application of Law No. 2018-28 of May 14, 2018 determining the fundamental; government under the Act, shall apply appropriate standards and techniques for use, and protection.
Decree No. 2009-224/PRN/MU/H of August 12, 2009	setting the terms of application of the special provisions of Law No. 61-37 of November 24, 1961 regulating expropriation for public utility and the temporary occupation amended and supplemented by Law No. 2008-37 of July 10, 2008, relating to the involuntary displacement and resettlement of populations.

3.2 LENDERS E&S REQUIREMENTS

• AFRICAN DEVELOPMENT BANK'S INTEGRATED SAFEGUARDS SYSTEM

The ten E&S OSs set out the requirements for Borrowers relating to the identification and assessment of E&S risks and impacts associated with operations supported by the Bank. The Bank believes that the application of these safeguards, by focusing on the identification and management of E&S risks and impacts, will support the Borrowers' goal of protecting communities and the environment from unintentional harm, as well as sustainably reducing poverty and increasing prosperity for the benefit of the environment and communities. The E&S OSs will support Borrowers towards: (i) achieving good GIIP relating to E&S sustainability; (ii) fulfilling their national and international E&S obligations; (iii) enhancing non-discrimination, transparency, participation, accountability, and governance; and (iv) enhancing the sustainable development outcomes of projects, activities, and other initiatives through ongoing stakeholder engagement.

The ten E&S OSs establish the standards that Borrowers shall meet, as appropriate, in projects, activities, and initiatives supported through Bank financing throughout the life cycle of operations, as follows:

- 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.
- E&S Operational Safeguard 10 (OS10): Stakeholder Engagement and Information Disclosure.

OS1 applies to all projects, activities, and other initiatives for which Bank financing is sought. OS1 establishes the importance of: (i) the Borrower's existing Environmental and Social Framework in addressing the risks and impacts of the project; (ii) an integrated ESA to identify the risks and impacts of a project, activity, or other initiative; (iii) effective stakeholder engagement through the disclosure of relevant information, consultation, and effective feedback; and (iv) the management of E&S risks and impacts, including climate risk and adaptation, by the Borrower throughout the lifecycle of operations. The Bank requires that all E&S risks and impacts including climate vulnerability and adaptation of the operations be addressed as part of the ESA conducted in accordance with OS1.

OS2 to OS10 complement OS1 and set out the obligations of the Borrower in identifying and addressing E&S risks and impacts that may require particular attention. These OSs establish objectives and requirements to maximize positive impacts and to avoid, minimize, reduce, and mitigate risks and adverse impacts, and where significant residual impacts remain, to compensate for or offset such impacts. OS5 covers involuntary resettlement (previously covered by OS2 under the 2013 ISS, which had replaced and superseded the Involuntary Resettlement Policy of 2003).

The Bank's Policy on Disclosure and Access to Information reflects its commitment to transparency, accountability, and good governance, and applies to the entire ISS. It includes the disclosure obligations that relate to the Bank Group's operations.

- **OTHER PERFORMANCE STANDARDS**

The International Finance Corporation Performance Standards (IFC PS) on Environmental and Social Sustainability are considered a benchmark for good practice for environmental and social risk management in private sector developments. The IFC PSs require that clients engage affected communities through disclosure of information, consultation, and informed participation, in a manner commensurate with the risks to and impacts of the Project on the affected communities.

The IFC PSs include specific guidance on conducting stakeholder engagement both during the planning phase and through the project lifecycle.

Other standards that will be considered in the development of this SEP are:

- IFC/World Bank Environmental, Health, and Safety (EHS) General Guidelines (IFC, 2012); and
- IFC EHS Guidelines for Railways.
- Equator Principles
- OECD Common Approaches

- **INTERNAL CORPORATE REQUIREMENTS**

Nigerian Social Legislation

In the consideration of Nigerian social legislation, the acts and/or policies considered to be relevant to the proposed Project include:

- I. Labour Act Cap L1, LFN 2004: The Labour Act is the primary law protecting the employment rights of individual workers. The Act covers protection of wages, contracts, employment terms and conditions, and recruitment; and classifies types of workers and special workers.
- II. Violence Against Persons (Prohibition) Act, 2005: The Violence Against Persons (Prohibition) Act (VAPP) was passed into law in May, 2015. The Act was necessitated as a result of agitations for protection of persons against different forms of violence. The Act has strengthened advocacy against rape, female genital mutilation, partner battery, stalking, harmful widowhood practices while prohibiting all forms of violence, including physical, sexual, psychological, domestic, harmful traditional practices and discrimination against persons. It also provides maximum protection and effective remedies for victims and punishment of offenders.
- III. Trafficking in Persons (Prohibition) Enforcement and Administration Act, 2015

The objectives of this Act are to:

- (a) provide an effective and comprehensive Legal and Institutional framework for the prohibition, prevention, detection, prosecution and punishment of human trafficking and related offences in Nigeria;
- (b) protect victims of Human Trafficking; and
- (c) promote and facilitate National and International co-operation in order to meet the Objectives set out in paragraphs (a) and (b) of this Section.

The Act established the National Agency for the Prohibition of Trafficking in Persons, among other functions, to:

co-ordinate and enforce all other Laws on Trafficking in Persons and related offences;
establish co-ordinated preventive, regulatory and investigatory machinery geared towards the eradication of trafficking in persons;
investigate all cases of trafficking in persons including forced labour, child labour, forced prostitution, exploitative labour and other forms of exploitation, slavery and slavery-like activities, bonded labour, removal of organs, illegal smuggling of migrants, sale and purchase of persons;
enhance the effectiveness of Law Enforcement agents and other partners in the suppression of trafficking in persons;
create public enlightenment and awareness through seminars, workshops, publications, radio and television programmes and other means aimed at educating the public on the dangers of trafficking in persons.

- IV. National Gender Policy, 2006

Nigeria put together the National Gender Policy in 2006. Its overall goal is to promote the welfare and rights of Nigerian women and children in all aspects of life: political, social and economic. The policy seeks to plan, coordinate, implement, monitor and evaluate the development of women in the country. In concrete terms, the National Gender Policy in Nigeria focus on:

- Contribution towards women's empowerment and the eradication of unequal gender power relations in the workplace and economy, in trade unions and in broader society;
- Encouragement of the participation, support and co-operation of men in taking shared responsibility for the elimination of sexism and redefining of oppressive gender roles;
- Increase the participation of women in leadership and decision-making;
- Ensure that through labour legislation and collective bargaining, the particular circumstances of women are considered and that measures are promoted to eliminate discrimination on the basis of gender;
- Ensure that there is a gender perspective in all sectors of development.

4 STAKEHOLDERS IDENTIFICATION

Stakeholders include individuals or groups that may influence or be impacted by the Project, described as follows:

“A stakeholder is any person, group of persons, or organization on which the Project (or activity) has an actual or potential, direct or indirect, positive or negative impact, or one that has an actual or potential, direct or indirect, positive or negative impact on the Project (or activity)”.

4.1 STAKEHOLDER IDENTIFICATION

The objective of stakeholder identification is to establish which organisations and individuals may be directly or indirectly affected (positively and negatively) by, or have an interest in, the Project. Stakeholder identification is an on-going process, involving regular review and the updating of the stakeholder register as the Project proceeds.

Stakeholders identified to date for inclusion in engagement activities meet one of the following criteria:

- Have an interest in the Project;
- Would potentially be impacted by or have an influence on the Project(negatively or positively); or
- Could provide commentary on issues and concerns related to the Project.

Table 4-1 provides an overview of stakeholder groups that were identified during the development of the ESIA.

4.2 STAKEHOLDER GROUPS

Table 4-1: Stakeholders Identified, Disaggregated by Level and Group

Group	Stakeholders	Country	
		Nigeria	Republic of Niger
National governmental authorities and representatives	Federal Ministry of the Environment (FMENV)	<input type="checkbox"/>	
	National Environmental Standards and Regulations Enforcement Agency (NESREA)	<input type="checkbox"/>	
	Federal Ministry of Transport	<input type="checkbox"/>	
	Federal Ministry of Works and Housing	<input type="checkbox"/>	
	Federal Ministry of Agriculture and Food Security	<input type="checkbox"/>	
	Federal Ministry of Water Resources, in particular the Nigeria Hydrological Services Agency	<input type="checkbox"/>	
	Federal Ministry of Lands, Housing and Urban Development	<input type="checkbox"/>	
	Federal Ministry of Interior, in particular the Nigeria Immigration Service	<input type="checkbox"/>	
	State Security Service	<input type="checkbox"/>	
	Nigeria Police Force	<input type="checkbox"/>	
	Federal Road Safety Corp	<input type="checkbox"/>	
	Federal Inland Revenue Service	<input type="checkbox"/>	
	Bureau of Public Enterprises	<input type="checkbox"/>	
	Ministry of Environment		<input type="checkbox"/>
	National Environmental Assessment Office (NEAO)		<input type="checkbox"/>
	Ministry of Transport, including Directorate of Traffic and Road Safety		<input type="checkbox"/>
	Ministry of Agriculture and Rural Development		<input type="checkbox"/>
	Ministry of Land and Housing		<input type="checkbox"/>
	Ministry of Equipment		<input type="checkbox"/>
	National Guard of Niger		<input type="checkbox"/>
National Gendarmerie		<input type="checkbox"/>	
State / regional governmental authorities and representatives	State Ministries of the Environment in Kano, Katsina and Jigawa	<input type="checkbox"/>	
	State Ministries of Transport in Kano, Katsina and Jigawa	<input type="checkbox"/>	
	State Ministry of Agriculture and Rural Development in Kano, Katsina and Jigawa	<input type="checkbox"/>	

Group	Stakeholders	Country	
		Nigeria	Republic of Niger
	Kano State Stock Route Demarcation Committee	<input type="checkbox"/>	
	State Ministry of Land, Housing and Urban Development in Kano, Katsina and Jigawa	<input type="checkbox"/>	
	Department of State Security in Kano, Katsina and Jigawa	<input type="checkbox"/>	
	Division of the Nigeria Police Force in Kano, Katsina and Jigawa	<input type="checkbox"/>	
	Division of the Federal Road Safety Corp in Kano, Katsina and Jigawa	<input type="checkbox"/>	
	Regional Council of Maradi		<input type="checkbox"/>
	Regional Directorate of Environment		<input type="checkbox"/>
	Regional Directorate of Transport, including Regional Directorate of Traffic and Road Safety		<input type="checkbox"/>
	Regional Directorate of Agriculture and Rural Development		<input type="checkbox"/>
	Regional Directorate of Land and Housing		<input type="checkbox"/>
	National Guard of Niger – Sub-Division of Maradi Region		<input type="checkbox"/>
	National Gendarmerie – Sub-Division of Maradi Region		<input type="checkbox"/>
Local and traditional governmental authorities and representatives	Local government councils for each of the Project-affected Local Government Areas (LGAs), including Local Government Chairmen and their support staff	<input type="checkbox"/>	
	Traditional leaders in each of the Project-affected LGAs, including members of emirate councils (e.g. emirs), district heads, village heads and ward heads	<input type="checkbox"/>	
	Local government for each of the Project-affected municipalities, including Mayors and their support staff		<input type="checkbox"/>
	Traditional leaders in each of the Project-affected municipalities, including chiefs		<input type="checkbox"/>
Project-affected communities	Project-affected communities (PACs) as a whole (Affected Communities tables below)	<input type="checkbox"/>	<input type="checkbox"/>
	People affected by physical or economic displacement – Project-affected persons (PAPs) – from the PACs	<input type="checkbox"/>	<input type="checkbox"/>
	Livelihood groups within the PACs (e.g. pastoralists and others engaged in livestock rearing, crop farmers, business owners and individual traders)	<input type="checkbox"/>	<input type="checkbox"/>
	Religious leaders of the PACs	<input type="checkbox"/>	<input type="checkbox"/>
	Women's groups/associations in the PACs	<input type="checkbox"/>	<input type="checkbox"/>
	Youth groups/associations in the PACs	<input type="checkbox"/>	<input type="checkbox"/>
	Associations in the PACs which represent vulnerable persons, including women, youths, people with disabilities, those who are Fulani or Tuareg by ethnicity etc	<input type="checkbox"/>	<input type="checkbox"/>

Group	Stakeholders	Country	
		Nigeria	Republic of Niger
Civil society, including national non-governmental organisations and trade unions	Green Nigeria Foundation	<input type="checkbox"/>	
	Life and Peace Development Organisation (LAPDO)	<input type="checkbox"/>	
	Society for Women's Development and Empowerment of Nigeria (SWODEN)	<input type="checkbox"/>	
	Youth and Environmental Development Association (YEDA)	<input type="checkbox"/>	
	All Farmers Association of Nigeria (AFAN)	<input type="checkbox"/>	
	Miyetti Allah Cattle Breeders Association (MACBAN)	<input type="checkbox"/>	
	National Union of Road Transport Workers (NURTW)	<input type="checkbox"/>	
	Organisation for the Protection of the Environment and Well-Being (Aghirin'man)		<input type="checkbox"/>
	Life and Development Association (AVD)		<input type="checkbox"/>
	Women, Actions and Development (FAD)		<input type="checkbox"/>
	Young Volunteers for the Environment (JVE)		<input type="checkbox"/>
	Federation of Cooperatives of Peasant Groups From Niger (MOORIBEN)		<input type="checkbox"/>
The Association for the Revitalisation of Livestock in Niger (AREN)		<input type="checkbox"/>	
Local public services	Representatives of health facilities within the PACs	<input type="checkbox"/>	<input type="checkbox"/>
	Representatives of educational facilities within the PACs	<input type="checkbox"/>	<input type="checkbox"/>
Local enterprises	Businesses engaged in sale of goods such as aggregates and other construction materials (e.g. quarrying companies, steel manufacturers), equipment, food, cleaning products, drugs and other medical supplies	<input type="checkbox"/>	<input type="checkbox"/>
	Businesses engaged in the provision of services such as construction (e.g. earthworks), transport/logistics, catering, cleaning and laundry	<input type="checkbox"/>	<input type="checkbox"/>
Research institutes / academia	Agricultural Research Council of Nigeria	<input type="checkbox"/>	
	National Agricultural Research Institute of Niger (INRAN)		<input type="checkbox"/>
International organisations	United Nations Children's Fund (UNICEF) – Country Offices	<input type="checkbox"/>	<input type="checkbox"/>
Media	Nigerian Television Authority (NTA)	<input type="checkbox"/>	
	Radio Jigawa	<input type="checkbox"/>	
	Radio Kano	<input type="checkbox"/>	
	Vision FM Katsina	<input type="checkbox"/>	
	Télé Sahel		<input type="checkbox"/>

Group	Stakeholders	Country	
		Nigeria	Republic of Niger
	The Voice of the Sahel Maradi		<input type="checkbox"/>

Table 4-2: Tables of the Project Affected Communities (PACs) by State and Section.

Jigawa State (Kazaure-Daura)

S/N	Community
1	Agangaro 2
2	Badori
3	Bandutse
4	Bengel
5	Chadi
6	Fago
7	Firji
8	Fitare
9	Furtawa
10	Gamji
11	Gurjiya Bojo
12	Jiba
13	Kanti Yamma
14	Katogi
15	Kwarare
16	Sabuwar Jawo
17	Sabuwar Yola
18	Takwasa
19	Wailare
20	Yadaganmu

Katsina State (Daura-Jibia)

S/N	Community
1	Daddara
2	Durbi Takusheyi
3	Gurjiya
4	Kayauki
5	Magajin Zaure
6	Magama
7	Muduru
8	Qarau
9	Rimin Guza
10	Tambu
11	Danheji
12	Katsina

S/N	Community
13	Kayawa
14	Kusa
15	Makurda
16	Mashi
17	Mazoji
18	Shargalle Sirika
19	Shargalle Yamel
20	Shinkafi
21	Yandaki

Jigawa State (Yargaya- Dutse)

S/No.	Community
1	Balan
2	Danlassan
3	Dundubus
4	Duru
5	Fanidau
6	Fanisau Bayan Camp
7	Gamoji
8	Garidau
9	Gurum
10	Jemagu
11	Kara
12	Karnaya
13	Kausani
14	Maimakawa
15	Shagogo
16	Warawa
17	Wudilawa
18	Yandalla
19	Yargaya
20	Zabuwa

Kano State (Yargaya-Dawanau)

S/No.	Community
1	Kuyan Tainna
2	Behun
3	Danbare

4	Danfami
5	Dangwauro
6	Dausayi
7	Dawanau Kasuwa
8	Fagenkawo
9	Gadama
10	Kudun Dufawa
11	Limawa
12	Rigafada
13	Rimin Gata
14	Rimin Zakara
15	Ungwar Duniya
16	Waratala
17	Yankusa
18	Yansango
19	Yargaya
20	Zawachicki

Kano State (Dawanau-Kazaure)

S/No.	Community
1	Bichi
2	Dambatta
3	Dawakin Tofa
4	Makoda
5	Minjibir
6	Kazaure
7	Roni

Republic of Niger

S/No	Community
1	Djiratawa
2	Safo
3	Dan Issa

• **VULNERABLE GROUPS**

Within a community, there may be individuals or groups of people who – by virtue of their race, age, gender, ethnicity, language, level of education, sickness, physical or mental disability, religion, political or other opinion, nationality, economic circumstances or dependence on unique natural resources – may be less able to cope with or adapt to the adverse impacts and risks caused by the Project, or less able to take advantage of Project-related benefits and opportunities.

During the social baseline surveys undertaken as part of the preparation of the Project's ESIA, a number of groups in the PACs were identified as vulnerable. Table 2-3: Vulnerable Groups Identified in the PACs presents the vulnerable groups identified, alongside a summary explanation of the reasons for their vulnerability. Further details about the groups outlined in Table are available in Project's ESIA Report.

Table 4-3: Vulnerable Groups Identified in the PACs

Group	Reasons for Vulnerability
Women	Women in the PACs face several challenges including a limited role in politics and decision-making, low levels of school attendance, limited access to maternity services, rape and other forms of gender-based violence (GBV), differential access to land as a result of religious inheritance practices, competition and conflicts in polygamous household settings and the burden of fulfilling multiple responsibilities on behalf of the household (both domestic- and work-related). Certain categories of women, namely female heads of households, may be particularly vulnerable, owing to additional challenges surrounding access to rental property, discrimination and so forth.
Youths	Youths in the PACs face a number of challenges including high levels of unemployment, low levels of literacy and, in the context of some communities, a limited role in politics and decision-making. Unemployment is a particularly significant concern, which underpins a number of other issues including frustration, substance abuse and involvement in crime.
Persons with disabilities	Such persons may experience difficulties in terms of accessing health services, education and employment, and may also be subject to disability-based discrimination and stigmatisation.
The elderly	Such persons may be subject to negative stereotypes and age-based discrimination (65 and above), experience feelings of isolation and loneliness and lack socialsecurity support.
Members of the Fulani and Tuareg ethnic groups	The livelihoods of the Fulani predominantly revolve around cattle rearing and thus their income is highly dependent upon access to land, much of which is owned by members of the Hausa ethnic group. Tuareg are typically regarded as settlers and thus they may encounter challenges in seeking access compensation for land and/or other assets affected by the Project by those who regard themselves as the original inhabitants of the Project area.

	In addition to the above, is important to note that the lifestyles of the Fulani, though increasingly sedentary, are traditionally nomadic or semi-nomadic and thus they may encounter difficulties in accessing information about developments affecting their community (such as the Project) and participating in community decision-making.
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Consistent with the requirements of GIIP, additional measures will be implemented to ensure that the stakeholder engagement activities undertaken by the Project are inclusive, help to ensure that information is adequately disclosed to vulnerable individuals and groups and enable such stakeholders to participate in the Project-related stakeholder engagement activities equal to other members of the PACs. These measures are further elaborated in Section 6.3

4.3 STAKEHOLDER ANALYSIS

A systematic analysis of the identified stakeholders is important to better understand their respective concerns and to develop an appropriate approach for engagement. This section describes how the stakeholders are assessed based on their category and area of interest, as well as their role in processes which may affect activities. This mapping exercise drew on knowledge of the Project area of MENG and from other ESIA's in Nigeria and the Republic of Niger.

A stakeholder mapping exercise has been carried out to support the stakeholder analysis and to help develop an appropriate approach to engagement. This map aims to provide a visual representation of people, groups or organisations who can influence or be interested in the Project as a whole. The stakeholder map is based on the following benchmarks:

- Influence on the Project (rated by high, medium, low): Influence refers to the power that the stakeholders have in relation to decisions either taken by, or affecting the Project. This power may be in the form of stakeholders that have formal control over the decision-making process or it can be informal in the sense of protesting against, blocking or allowing Project operations to continue. It is also important to map those stakeholders whose interests determine them as stakeholders, i.e. may be directly involved with the Project or have something to either gain or lose because of Project implementation. Understanding stakeholder level of interest can help clarify the motivations of different actors and the ways in which they might be able to influence the Project.
- Interest in and impact on the Project (rated by high, medium, low). Impact refers to the consequences for the stakeholder of undertaking the Project in relation to their environment, socio-economic and cultural context. The level of impact also influences affected stakeholder's interest in the Project; the higher the level of impact, the higher the interest in the way impacts are being addressed.

Positions of stakeholders may change over time as the Project progresses. The assessment of stakeholder influence, interest and impact, as well as perception, will be reviewed and updated as appropriate. In addition, any new stakeholder identified will be added into the analysis.

Stakeholders have been mapped according to interest, influence and impact. Figure 2-1 provides a high-level overview of the outcome of the stakeholder mapping.

Figure 4-1- Stakeholder Mapping

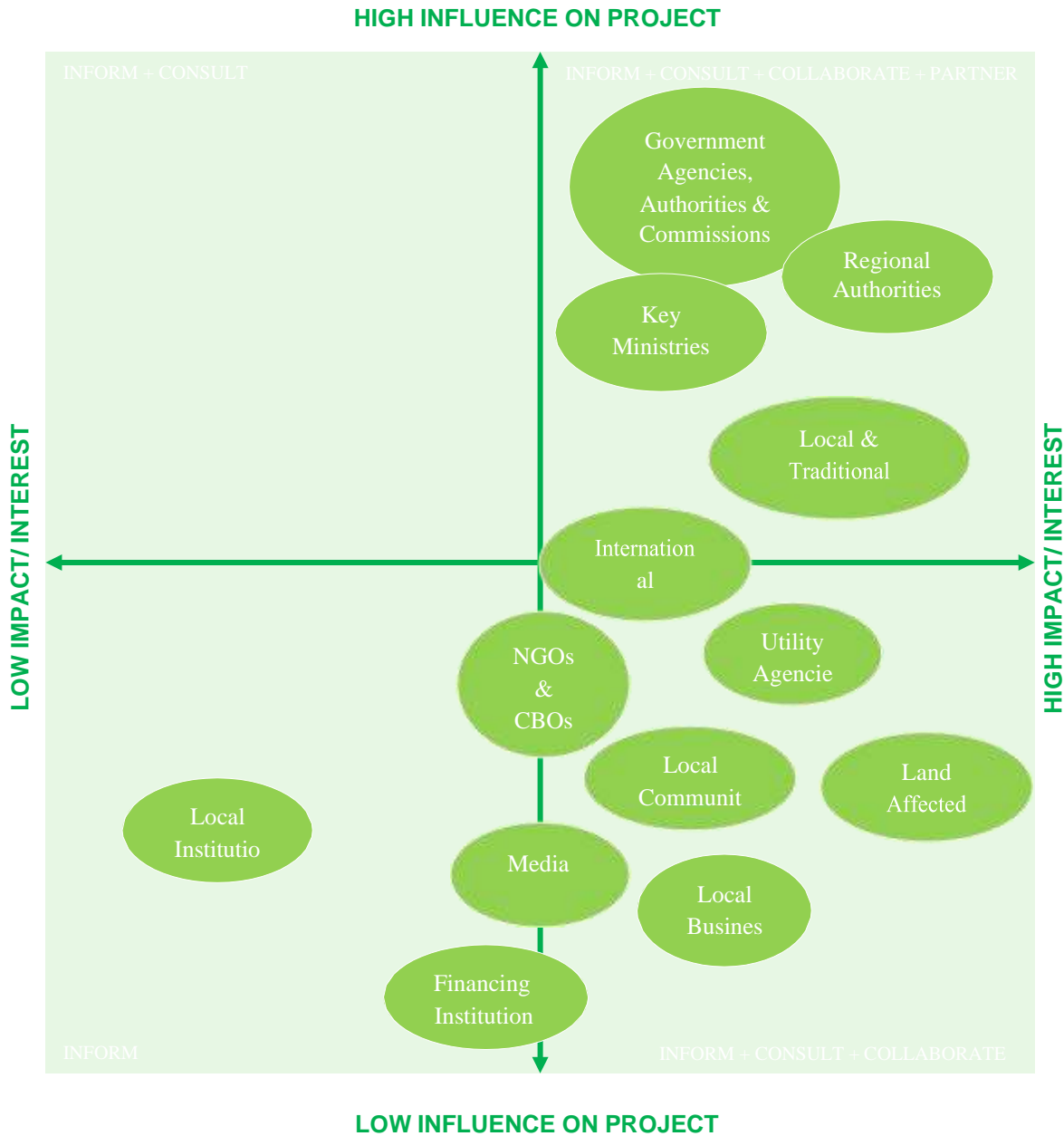


Table 4-4 provides the information of the broad categories of Stakeholders, their specific areas of influence on the project over its lifecycle, and the roles and responsibilities they could or should play to contribute to the success of the project for their own benefits.

Table 4-4: Broad categories of Stakeholders and their areas of interest

Group	Stakeholders	Category	Area of Interest	Country	
				Nigeria	Republic of Niger
	Federal Ministry of the Environment (FMEnv)	Regulator	Compliance with national Environmental laws & regulations	x	
	National Environmental Standards and Regulations Enforcement Agency (NESREA)	Regulator	Compliance with national Environmental laws & regulations	x	
	Federal Ministry of Transportation	Institutional	Implementation of E&S Safeguards	x	
	Federal Ministry of Works and Housing	Institutional	RAP preparation & implementation (ROW management)	x	
	Federal Ministry of Agriculture and Food Security	Institutional	Livelihood of affected farmers and herders	x	
	Federal Ministry of Water Resources, in particular the Nigeria Hydrological Services Agency	Institutional	Sustainable use of water	x	
	Federal Ministry of Interior, in particular the Nigeria Immigration Service	Institutional	Internal security and, immigration issues	x	
National	State Security Service	Institutional	Internal security	x	
	Nigeria Police Force	Institutional	Internal security	x	
	NSCDC		Security of critical infrastructure	x	
	Federal Road Safety Corp	Institutional	Road traffic control during project implementation	x	
	Federal Inland Revenue Service	Institutional	Taxes	x	
	Bureau of Public Enterprises	Institutional	Infrastructure privatization	x	
	Infrastructure Concession and Regulatory Commission (ICRC)	Institutional	Infrastructure concession	x	
	Nigeria Railway Corporation (NRC)	Institutional	Project operations	x	
	Ministry of Environment	Institutional	Compliance with national Environmental laws & regulations		x
	National Environmental Assessment Office (NEAO)	Institutional	Compliance with national Environmental laws & regulations		x
	Ministry of Transport, including Directorate of Traffic and Road Safety	Institutional	Road traffic control during project implementation		x

Group	Stakeholders	Category	Area of Interest	Country	
				Nigeria	Republic of Niger
	Ministry of Agriculture and Rural Development	Institutional	Livelihood of affected farmers and herders		x
	Ministry of Land and Housing	Institutional	RAP preparation & implementation (ROW management)		x

5 STAKEHOLDER ENGAGEMENT TO DATE

This Section provides a summary of the stakeholder engagement disclosure activities undertaken during the ESIA process so far. This includes a description consultation undertaken during the ESIA, and the development of a Grievance Response Mechanism (GRM). An overview of the key issues raised by stakeholders during both scoping and ESIA phases is also provided.

All engagements have been conducted in a culturally appropriate manner, by involving the representatives of each community in the preparation of the meetings and accounting for the participation of women. Scoping engagement was undertaken before COVID-19 pandemic while ESIA engagement had to adapt to the new situation and restrictions. In this regard face-to-face engagements were minimised and the organisation of public meetings was replaced with meetings with community representatives.

A number of steps were taken to ensure the safety of all those involved (both stakeholders and consultants), including:

- holding activities involving large groups of people (e.g. the scoping workshops described below) in the capital cities of the Project-affected states, which are at less risk of security issues; and
- outside of the capital cities, hiring security personnel to accompany the consultants, particularly when travelling between the Project-affected states.

5.1 SCOPING ACTIVITIES

Scoping workshops in Nigeria were organised and held at the state capitals of the three affected states in Nigeria; namely Dutse (Jigawa State), Kano (Kano State) and Katsina (Katsina State). In Jigawa, the scoping workshop was held at Dutse Royal Hotel, Dutse, Jigawa State on Monday, 20th September, 2021. The Scoping Workshop for stakeholders in Kano State was held at the Grand Central Hotel, Kano on Tuesday, 21st September, 2021 while the workshop was held in Katsina on Thursday, September 23rd, 2021 at Education Resource Centre, opposite Katsina Museum, Katsina (refer to Table 5-1).

The scoping workshop for the project in Niger took place between December 23th to December 29th, 2021. The consultations/meetings held for the purpose of this project are summarized in Table below (Appendix 3- Attendance List)

Table 5-1: Scoping Activities

Meeting	Dated	Targets
Courtesy visit and collective meeting with stakeholders	December 23, 2021	Governorate - Technical Services
Scoping meeting	December 23, 2021	Experts – Nigeria team Decentralized authorities
Field visit and reconnaissance of the route	December 24, 2021	Team of experts and partners from Nigeria
Individual meetings with regional authorities and technical services	25, 26 and 27 December 2021	City Council and Regional Council of Maradi, Technical Services
Collective meeting	December 25 to 29, 2021	Municipal councils, Madarounfa Prefecture, Women's groups, Youth association

In Nigeria, prior to the workshops, invitation letters with the Project Background Information Document (BID) were sent to all the key stakeholders in the three states. These included ministries and government agencies at the federal, state and local government levels. The traditional rulers including the Emirs, and District Heads were pre-informed and invited. In addition, Non-Government Organisations, Civil Society Organisations, trade unions, and other interest groups were invited to be a part of the scoping exercise.

At the scoping workshop in Jigawa, 128 participants were present; 120 people attended the workshop in Kano and 84 attendees came to the workshop held in Katsina (Appendix 3- Attendance List). The scoping workshops were held in an open house format with adequate capacity for all attendees. Posters and banners about the Project were displayed at each of the venues while presentations were made in English and Hausa by the Allott Team. At the end of the presentation, participants were encouraged and given opportunities to express their views.

In Niger, prior to the environmental and social assessment process, direct communication were held as follows:

- meeting with the administrative authorities of Maradi region, which was held in February 2021 (Appendix 3- Attendance List),
- meeting with key technical services sectors, including environment, equipment, labour inspection, transportation and town halls.

Table 5-2 Scoping Workshops

State	Date	Location	No. of Participants	Group of Participants / Stakeholders
Jigawa	Monday, 20th September, 2021	Dutse Royal Hotel, Dutse, Jigawa State	128 (Male: 114, Female: 14)	<ul style="list-style-type: none"> • In attendance were representatives of: • National governmental authorities (e.g. Federal Ministry of Environment, National Environmental Standards and Regulations Enforcement Agency or NESREA); • Regional governmental authorities (e.g. state ministries of the environment, of agriculture and rural development); • Local governmental authorities (e.g. local government councils); • The Project-affected
Kano	Tuesday, 21st September, 2021	Grand Central Hotel, Kano	120 (Male: 108, Female: 12)	
Katsina	Thursday, September 23, 2021	Education Resource Centre, Opposite Katsina Museum, Katsina	84 (Male: 77, Female: 7)	

State	Date	Location	No. of Participants	Group of Participants / Stakeholders
				<p>communities (PACs) (e.g. traditional leaders including district heads and members of emirate councils);</p> <ul style="list-style-type: none"> • Civil society (e.g. trade unions such as the National Union of Road Transport Workers and AllFarmers Association of Nigeria, non-governmental organisations (NGOs) such as the Youth and Environmental Development Association (YEDA) and Society for Women's Development and Empowerment of Nigeria (SWODEN)); • Media (e.g. Radio Jigawa, Radio Kano,

State	Date	Location	No. of Participants	Group of Participants / Stakeholders
				<p>Vision FM Katsina); and</p> <ul style="list-style-type: none"> International organisations (e.g. United Nations Children’s Fund (UNICEF)).
Maradi	23-29 December 2021	4 communities: CU Maradi, Dan Issa, Madarounfa, Djirataoua and 10 villages: Farou, Dan Makao , Tachar Yan Maré, Doutsin Bégoua, Bakwassa, Guidan matché daya, Kiriya, Danja, Kéguelet Guidan Hardo	-	<ul style="list-style-type: none"> National governmental authorities Regional governmental authorities Local governmental The Project-affected communities (PACs) (e.g. traditional leaders including district heads and members of emirate councils);

Figure 5-1: Engagement with Stakeholders During the Scoping Phase of the Project's ESIA, Nigeria, September 2021



Figure 5-2: Workshop Undertaken As Part of the RAP Scoping Study, Nigeria, September 2021



Figure 5-3: Women 's groups participation during the Stakeholders meeting, Republic of Niger, December 2021



Figure 5-4: Kasaure Emir 's Palaca Stakeholders meeting, Nigeria, December 2022



Figure 5-5: Maradi Stakeholders meeting, Republic of Niger, July 2023



Figure 5-6: Makoda LGA secretariat Stakeholders meeting, Nigeria, December 2023



Figure 5-7: Kunchi Quarry site Stakeholders meeting, Nigeria, February 2024



Figure 5-8: Unawar Dinya Stakeholders meeting, Nigeria, March 2024



5.2 STAKEHOLDER ISSUES

The major issues raised during the Scoping Workshop, which were a concern to the stakeholders, include the potential economic displacement of farmers from farmlands and impacts on their livelihood, and potential physical displacement and how to effectively mitigate the hardships that could result from physical and economic displacement. A summary of comments and key issues raised during the scoping workshops is provided in **Table. 5-3**. Other matters raised include fragmentation of communities and grazing routes, risk of train collisions with cattle, train-related accidents and other issues.

Table 5-3 Summary of Comments and Key Issues Raised during the Scoping Workshops

State / Commune	Summary of Comments and Key Issues Raised	Mitigation Measures/ Action Plan
Nigeria		
Jigawa	Representative of Jigawa State Commissioner of Police: Engagement of local youths in the project to reduce unemployment, which is a major cause of criminal activities.	Local Content Plan/ 92% of MENG workforce hired so far is Nigerian (March 2024)
	Women Leader (Hajiya Hadiza Abdulwahab): Women should be carried along throughout the project execution stages especially with respect to decisions and employment.	Plan for Gender Equality Mota-Engil/ GenderReport_2023/ 30% Women recruited or promoted to manager by 2026-MENG Goal (Sustainability Report)
	A security operative (Musa Muhammed) raised concern about land take, displacement and grievances; suggesting that compensation and grievance resolution mechanism should be put in place.	Grievance Management Procedure (MENG)
Kano	The Director of Kano State Stock Route (Dr. Saleh): Fragmentation of the international grazing routes by the rail line is a major concern. Mitigation Measures to address this should be at the project design phase.	PDM 14 (Project Design Mitigation- ESIA)- Overbridges will be placed at roads between key communities which allow for pedestrian and livestock to cross the railway line (preliminary design considers an overbridge distribution of approximately average distance of 3 km between 2 overbridges). The drainage provision (Culverts, pipes) at appropriate intervals along the railway line will also allow the crossing of cattle and wild animals, and in some instances allow the crossing of pedestrians/ Stakeholder Engagement Plan (MENG)
	MACBAN Representative: Potential impact on cattle, herdsmen should be well-addressed during planning and construction.	PDM 14 (Project Design Mitigation- ESIA)- Overbridges will be placed at roads between key communities which allow for pedestrian and livestock to cross the railway line (preliminary design considers an overbridge distribution of approximately average distance of 3 km between 2 overbridges). The drainage provision (Culverts, pipes) at appropriate intervals along the railway line will also allow the crossing of cattle and wild animals, and in some instances allow the crossing of pedestrians/ Stakeholder Engagement Plan (MENG)

State / Commune	Summary of Comments and Key Issues Raised	Mitigation Measures/ Action Plan
	<p>Representative of Kano Emirate Council: Displacement of farmers and livestock owners from grazing field should be handled with caution. Grievances redress mechanism should be put in place.</p>	<p>PDM 14 (Project Design Mitigation- ESIA)- Overbridges will be placed at roads between key communities which allow for pedestrian and livestock to cross the railway line (preliminary design considers an overbridge distribution of approximately average distance of 3 km between 2 overbridges). The drainage provision (Culverts, pipes) at appropriate intervals along the railway line will also allow the crossing of cattle and wild animals, and in some instances allow the crossing of pedestrians/ Stakeholder Engagement Plan (MENG)</p>
Katsina	<p>Sensitization campaigns for herders along the rail route should be embarked on so that there would not be cases of animal's crossing the rail line when it becomes operational.</p>	<p>PDM 14 (Project Design Mitigation- ESIA)- Overbridges will be placed at roads between key communities which allow for pedestrian and livestock to cross the railway line (preliminary design considers an overbridge distribution of approximately average distance of 3 km between 2 overbridges). The drainage provision (Culverts, pipes) at appropriate intervals along the railway line will also allow the crossing of cattle and wild animals, and in some instances allow the crossing of pedestrians/ Stakeholder Engagement Plan (MENG)</p>
	<p>All Farmers Association of Nigeria (AFAN) Representative: Compensation for displacement</p>	<p>Land Use Act 2004 Compensation. Livelihood Restoration Plan to be implemented</p>
	<p>The representation of Umaru Musa Yar'adua University Centre for Renewable Energy: Local content / engagement of local manpower at different phases of the project.</p>	<p>Local Content Plan/ 92% of MENG workforce hired so far is Nigerian (March 2024)</p>

State / Commune	Summary of Comments and Key Issues Raised	Mitigation Measures/ Action Plan
	The coordinator of Katsina Women Economic Empowerment Project: Women participation in the project	Plan for Gender Equality Mota-Engil/ GenderReport_2023/ 30% Women recruited or promoted to manager by 2026-MENG Goal (Sustainability Report)
	Deputy Commandant of Nigeria Security and Civil Defence Corps Security issues should be addressed by liaising with security operatives and investment in security outposts.	Grievance Management Procedure (MENG)/ Stakeholder Engagement Plan (MENG)/ Resettlement Management Committee (RMC)
	The representatives of Katsina Livestock Development Project: Mitigation plan for livestock in the project area, which are likely to be impacted.	PDM 14 (Project Design Mitigation- ESIA)- Overbridges will be placed at roads between key communities which allow for pedestrian and livestock to cross the railway line (preliminary design considers an overbridge distribution of approximately average distance of 3 km between 2 overbridges). The drainage provision (Culverts, pipes) at appropriate intervals along the railway line will also allow the crossing of cattle and wild animals, and in some instances allow the crossing of pedestrians/ Stakeholder Engagement Plan (MENG)
	The representative of Great Green Wall: Tree planting is an important mitigation measure to address land clearing for rail construction.	ADM-BD- 004 (Additional Mitigation- ESIA)- A No-Net Loss (NNL) Strategy for Natural Habitats proposed as part of the Biodiversity Management Plan, will set appropriate measures to compensate for/offset the small amount of Natural Habitat lost due to Project activities. This will include replanting of Natural Habitat lost to the Project in key areas to maximise benefits, for example within the existing Forest Reserve areas crossed by the Project and to connect isolated and fragmented habitat patches. Livelihood Restoration Plan to be implemented.

State / Commune	Summary of Comments and Key Issues Raised	Mitigation Measures/ Action Plan
	Miyetti Allah Cattle Breeders Association of Nigeria Representative: Fragmentation of the local and international grazing routes, associated impacts and possible mitigation.	PDM 14 (Project Design Mitigation- ESIA)- Overbridges will be placed at roads between key communities which allow for pedestrian and livestock to cross the railway line (preliminary design considers an overbridge distribution of approximately average distance of 3 km between 2 overbridges). The drainage provision (Culverts, pipes) at appropriate intervals along the railway line will also allow the crossing of cattle and wild animals, and in some instances allow the crossing of pedestrians/ Stakeholder Engagement Plan (MENG)
	The representative of CAREFOR (NGO) made case for likely impacts of the project on sensitive biological receptors.	Biodiversity Management Plan (MENG)
Niger		
Maradi, Madarounfa, Dan Issa and Jirataoua	Loss of large cultivable areas;	Livelihood Restoration Plan to be implemented.
	Destruction of the environment (cutting down of several trees);	ADM-BD- 004 (Additional Mitigation- ESIA)- A No-Net Loss (NNL) Strategy for Natural Habitats proposed as part of the Biodiversity Management Plan, will set appropriate measures to compensate for/offset the small amount of Natural Habitat lost due to Project activities. This will include replanting of Natural Habitat lost to the Project in key areas to maximise benefits, for example within the existing Forest Reserve areas crossed by the Project and to connect isolated and fragmented habitat patches. Livelihood Restoration Plan to be implemented.

State / Commune	Summary of Comments and Key Issues Raised	Mitigation Measures/ Action Plan
	Restriction and/or disappearance of pastoral enclaves;	PDM 14 (Project Design Mitigation- ESIA)- Overbridges will be placed at roads between key communities which allow for pedestrian and livestock to cross the railway line (preliminary design considers an overbridge distribution of approximately average distance of 3 km between 2 overbridges). The drainage provision (Culverts, pipes) at appropriate intervals along the railway line will also allow the crossing of cattle and wild animals, and in some instances allow the crossing of pedestrians/ Stakeholder Engagement Plan (MENG)
	Restriction of access;	PDM 14 (Project Design Mitigation- ESIA)- Overbridges will be placed at roads between key communities which allow for pedestrian and livestock to cross the railway line (preliminary design considers an overbridge distribution of approximately average distance of 3 km between 2 overbridges). The drainage provision (Culverts, pipes) at appropriate intervals along the railway line will also allow the crossing of cattle and wild animals, and in some instances allow the crossing of pedestrians/ Stakeholder Engagement Plan (MENG)
	Disappearance of cultivation areas;	Livelihood Restoration Plan to be implemented.
	Risk of STD/HIV AIDS contamination;	Harassment and Discrimination Policy (ME)/ Health & Safety Awareness campaigns (SHEQ)/ Condoms Distribution to workers
	Risk of groundwater contamination;	Water Management Plan/ Soil Management Plan (MENG)
	Risks of damage to water pipes;	Stakeholder Engagement Plan / Construction Method Statements (MENG)

State / Commune	Summary of Comments and Key Issues Raised	Mitigation Measures/ Action Plan
	Risk of accidents during crossings;	Emergency and Preparedness Plan (MENG)
	Procedures for recruiting local unskilled labour;	Local Content Plan/ 92% of MENG workforce hired so far is Nigerian (March 2024)
	Prioritize premises in recruitment;	HR_Global_Policy (ME)
	Compensation of the affected before the start of the work; and <input type="checkbox"/> Fair compensation in accordance with the texts;	Land Use Act 2004 Compensation. Livelihood Restoration Plan to be implemented

5.3 SURVEYING AND PROJECT DISCLOSURE

The Social Impact Assessment (SIA) Team will use the basic structure and principles of the ESIA SEP. Stakeholder mapping will serve as an important tool and an on-going process. Therefore, where there are various groups and lead actors, as the SIA progresses, the stakeholders will expand and continue to grow until the last consultations are held. Overtime the power and influence of the stakeholders will be clarified, and key informants will be identified as well as PAPs and PACs using grouping of leaders, male, female, youth, and the vulnerable groups will be further defined and adjustments will be made to the SEP as required.

In Nigeria, the national ESIA Scoping Report is placed in the public domain for discussion, thereby helping to ensure that stakeholders' views are taken into account in the development of the National ESIA. For proper disclosure, the National ESIA Report shall be submitted to the FMEnv (Nigeria), National Office for Environmental Assessment (Niger) States Ministries of Environment (Nigeria), affected Local Government Authorities and other relevant stakeholders. The FMEnv (Nigeria) and National Office for Environmental Assessment (Niger) shall determine the level of engagement required during disclosure of the national ESIA report and meetings with local communities.

In Niger, the advertising process must accompany the completion of the environmental assessment (environmental and social impact assessment) in accordance with the provisions of Article 41 of Decree No. 2019-027 / PRN / MESU / DD of January 11, 2019 on the terms of 2018-28 of May 14, 2018 determining the fundamental principles of Environmental Assessment in Niger. This mechanism must include:

- o Information and sensitization of the populations concerned on the conduct of environmental and social impact assessment of the project;
- o Consultation of the public, including administrative and customary authorities, NGOs and associations as well as affected people, during the preparation of the ESIA report;
- o The popularization of the REIES project among the target groups consulted, for the purposes of possible amendments and ownership on their part;
- o Accessibility of the report by any appropriate means to the NEAO and its branches as well as to the levels of the local authorities concerned;

- o Consultation of the population by all appropriate means on the content of the REIES.

The ESIA Report (Nigeria) public display was held between the 20th June, 2022 and the 18th July, 2022 in the mass media (e.g. local radio, press), complying with the 21 working days Public Display.

In Niger, the disclosure and verification will be done by the public administration to ensure that the ESIA and the Resettlement Plan (RP) approach and texts have been addressed, the administration performs it just before workshop is held. The ESIA and RP disclosure will be undertake once the program of the workshop is established and known.

5.4 E&S PUBLIC REVIEW ACTIVITIES

E&S Public Reviews workshops in Nigeria were organised and held at the state capitals of two affected states in Nigeria; Kano (Kano State) and Katsina (Katsina State). The Public Review for stakeholders in Katsina State was held at the Hillside Hotel, Katsina on Monday, 20th February, while the workshop in Kano was held in 22nd February, 2023 at Tahir Hotel, Kano.

Figure 5-9: Engagement with Stakeholders as part of the ESIA Public Review, Kano-Nigeria, February 2023



Figure 5-10: Workshop Undertaken as part of the ESIA Public Review, Kano-Nigeria, February 2023



6 STAKEHOLDER ENGAGEMENT STRATEGY

6.1 PRINCIPLES OF ENGAGEMENT

The following principles will be applied throughout the implementation of the stakeholder engagement programme outlined in Section 6.2:

- All engagement activities will be conducted in a manner which seeks to protect the health and safety of all those involved. In this context, safety Measures to reduce the potential risks associated with COVID-19 at the time of the proposed engagements will be implemented where necessary (see Section 6.2.1 for further details).
- In consideration of the fragile security context in which the Project is embedded along the Nigerian section of the Project route, specific measures will be implemented to reduce potential security risks to all those involved at the time of the proposed engagements (see Section 6.2.1 for further details).
- Notifying stakeholders and organising the engagement activities:
 - Engagements with institutional stakeholders (i.e. governmental authorities) shall be arranged through the issuing of invitation letters via post or email or by placing telephone calls to stakeholders, with follow-up as necessary to confirm the date, time and location of the engagements. In the case of Nigeria, FMOT will lead the process of arranging meetings with institutional stakeholders with the support of Mota-Engil, reflecting national customary practices.
 - Engagements with the PACs shall be arranged with the support of the traditional leaders of the communities. In the case of Nigeria, this may include emirs, district heads, village heads and ward heads. In the case of the Republic of Niger, this will include village chiefs.
 - Stakeholders will be provided with sufficient notice of the date and timing of the engagement activities (i.e. at least one week) in order to increase the likelihood that they will be available to attend and to give them adequate time to prepare. Where they are not available to attend, efforts will be made to reschedule the engagement activities on a date and/or at a time that is more convenient for the participants.
 - Convenient locations and venues for the engagement activities will be agreed with stakeholders based on proximity to stakeholders, ease of access and adequate seating capacity. Consideration shall also be given to the size of the venues to ensure they have sufficient capacity to accommodate the number of stakeholders invited to the engagement.
- Conducting the engagement activities:
 - All engagement activities shall be undertaken in a manner that respects the human rights of all those involved, free of external manipulation, interference, coercion or intimidation.
 - Different methods shall be used to engage with stakeholders, including but not limited to workshops, forums, focus groups and meetings of various sizes (i.e. one-to-one, small, medium and large group/community meetings), alongside remote methods of engagement (e.g. media announcements on radio stations, television and in newspapers, publication of information on the Project's website).

- Written materials, such as PowerPoint presentations, posters and information leaflets, shall be used to facilitate information exchange and complement verbal communications with stakeholders, particularly around key issues. The materials will be written in English and French, the official languages of Nigeria and the Republic of Niger. Based on experiences of engaging with stakeholders during the preparation of the Project's ESIA to date, these materials shall likely need to be translated and presented verbally in the relevant local languages (e.g. Hausa, Fulfude) during engagements with the PACs.
- The engagement activities shall be conducted in English and/or the relevant local languages (Hausa, Fulfude) in Nigeria. In the Republic of Niger, the engagement activities shall be conducted in French and/or Hausa. In both countries, the engagement activities shall follow a pre-defined agenda. The exact nature of the agenda will vary depending on the phase associated with the activity and the stakeholders involved. Meetings and workshops will, however, generally include:
 - opening remarks, during which introductions shall be made and the purpose/objectives of the engagement shall be stated;
 - the presentation of information to stakeholders (see Table 6-1 to Table 6-3 for the types of information to be provided during each phase);
 - a question-and-answer session, to which sufficient time will be allocated; and
 - closing remarks, whereby stakeholders will be thanked for their participation and reminded to use the CGM (see Section 8 for further details) should any concerns or grievances related to the Project after the meeting/workshop.

During opening remarks, stakeholders will be encouraged to participate in the meeting/workshop but will be reminded that participation is voluntary and that stakeholders are free to decline to participate at any time. Permission will also be sought to take photographs. Prior to starting the meeting/workshop, any relevant customary practices (e.g. prayers, blessings) shall be observed.

- The engagement activity shall be led by shall be led by the Project's CLOs, who will be responsible for leading and facilitating the activities, presenting information to stakeholders (with reference to written materials, where relevant and appropriate), answering stakeholders' questions and documenting the activities in line with the principles stated below. Depending on the stakeholders involved and issues to be discussed, additional Project personnel (e.g. the Construction/Operations Environmental and Social (E&S) Manager, senior management) may also assist with and participate in the activities.
- Refreshments, such as snacks and water, will be provided for attending stakeholders.
- Where required, a venue will be identified in which to convene the stakeholder engagement activity, accounting for the potential risks associated with COVID-19 where relevant (see Section 6.2.1).
- Transport allowances shall be provided to stakeholders who have travelled out of their local area to participate in an engagement activity. In Nigeria, in line with local

customary practices, the transport allowance shall be paid to the heads of the different stakeholder groups eligible to receive the allowance (e.g. the most senior representative of the institutional stakeholders or the most senior representative of the traditional leaders). When making the payment, the CLO will clearly communicate that the transport allowance is intended for the entire group. The amount to be paid will vary according to the distance travelled by the stakeholder(s) in question to participate in the engagement activity.

- In line with the provisions of Section 4.1.2, additional measures will be implemented to ensure that the engagement activities are inclusive and enable the participation of vulnerable individuals and groups equal to other stakeholders (see Section 6.2.1 for further details).
- Documenting the engagement activities:
 - All engagements with stakeholders will be documented in the form of attendance lists, meeting minutes and, subject to the permission of the attending stakeholders, photographs.
 - Stakeholders' attendance will be recorded using an agreed template (see Appendix 4).
 - Meeting minutes will be recorded using an agreed template (see Appendix 5); the CLOs responsible for recording the minutes will endeavour to accurately capture all comments, questions and concerns raised by stakeholders and the responses provided.
 - No photographs will be taken if the attending stakeholders object.
 - Following engagements with stakeholders during the Project's pre-construction, construction and operations phases, a summary of each activity shall be recorded by the CLOs in a Stakeholder Engagement Register, inclusive of details such as date/timing of activity, the stakeholders involved, the topics discussed and stakeholders' questions and feedback. A template for the Stakeholder Engagement Register is provided in Appendix 6. The Register shall enable engagements with stakeholders to be easily and quickly reviewed without having to consult more detailed records (e.g. separate files of meeting minutes), and shall also be used to document any informal, ad-hoc interactions (e.g. phone calls, unplanned encounters) and communications (e.g. letters, email correspondence) between Project representatives and stakeholders.
 - All personal data recorded within the attendance lists and meeting minutes (e.g. names, phone numbers and other attributable personal information), alongside photographs of stakeholders (where taken), will be managed in accordance with legal and best practice requirements (see Section 6.2.1 for further details).

6.2 PHASES OF ENGAGEMENT

Building on the stakeholder engagement activities undertaken to date (see Section 4), further engagements will be undertaken with stakeholders in Nigeria and the Republic of Niger during the Project's:

- pre-construction phase (post-ESIA and prior to mobilisation);
- construction phase (including mobilisation, commissioning and demobilisation); and
- operations phase.

Further details with respect to the above, including the timing, targeted stakeholders, engagement methods and materials, information to be provided, feedback to be sought and outputs, are presented in Table 6-1 to Table 6-3.

Table 6-1: Engagement Activities to be Undertaken during the Project's Pre-Construction Phase

Activity	Timing	Targeted Stakeholders	Engagement Method	Engagement Materials	Information to be Provided	Feedback to be Sought	Outputs	Implementation Cost (NGN)
Publication of the Project's ESIA Report (final version)	To be determined	<ul style="list-style-type: none"> All stakeholders engaged as part of the preparation of the Project's ESIA Report (e.g. during the scoping report and baseline phases) Members of the public (general) 	<ul style="list-style-type: none"> Publication of the Project's ESIA Report and Non-Technical Summary (NTS) on the Project's website Printing and distribution of hard copies of the Project's NTS in the offices of local governmental authorities in major settlements along Project route Media advertisements (e.g. on radio, in newspapers) announcing publication of Project's ESIA Report and where copies of the document and NTS can be found 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> The Project's ESIA Report (final version) and NTS Where to find a copy of the Project's ESIA Report (e.g. Project web address) and NTS (e.g. physical address of offices of governmental authorities) Contact details to be used to request further information 	<ul style="list-style-type: none"> No specific feedback sought; contact details to be provided for stakeholders to use to request further information 	<ul style="list-style-type: none"> No specific outputs sought; communications received with respect to the Project's ESIA Report to be recorded, however, in the Stakeholder Engagement Register (see Appendix 6) 	4,955,000 1000 posters @ 1000 NGN 1,000,000.00 20,000 flyers @ 50 NGN 1,000,000.00 Daily Trust 364 021 Guardian 304 610 New Nigeria Radio Katsina x 10 days 712 750 Radio Kano x 10 days 800 000 Radio Jigawa x 10 days 704 000 Audio Production (Hausa) 70 000
Issue of an update letter / placement of telephone calls to key stakeholders	To be determined	<ul style="list-style-type: none"> Local governmental authorities of the Project-affected states (Nigeria) and Project-affected region of Maradi (Niger) Traditional leaders of the PACs 	<ul style="list-style-type: none"> Update letter Telephone calls 	<ul style="list-style-type: none"> Update letter 	<ul style="list-style-type: none"> An updated timetable for the Project and any material changes made to the Project since the finalisation of the Project's ESIA Report Plans for the pre-construction engagement meetings (see below) Introduction to the CGM and CLOs (inclusive of provision of relevant contact details) 	<ul style="list-style-type: none"> Any general comments, questions or concerns in response to update 	<ul style="list-style-type: none"> Record of stakeholders' comments, questions or concerns (recorded using the template in Appendix 5) Updated Stakeholder Engagement Register to include communications between Project and stakeholders 	5,000,000 (assuming 50 institutional stakeholders @ 100,000 NGN per MDA with logistics for distribution)

Activity	Timing	Targeted Stakeholders	Engagement Method	Engagement Materials	Information to be Provided	Feedback to be Sought	Outputs	Implementation Cost (NGN)
Pre-construction engagements with the PACs and other key stakeholders	To be determined	<ul style="list-style-type: none"> Members of the PACs, including pastoralists and pastoral leaders, traditional leaders and religious leaders Other key stakeholders such as governmental authorities (including those with responsibilities for ensuring public safety and security, alongside the management of cultural heritage), civil society organisations (including local neighbourhood watch / 'vigilante' groups) and local transport workers 	<ul style="list-style-type: none"> One-to-one, small group and community meetings; the latter shall include meetings with members or representatives of vulnerable groups in the affected communities (as identified in Section 4.1.2) and those whose livelihoods revolve around the provision of transportation services 	<ul style="list-style-type: none"> PowerPoint presentations, posters, maps, information leaflets and other materials, as necessary, depending on the stakeholders involved 	<ul style="list-style-type: none"> Latest updates on the Project, including with respect to Project design, route, schedule and so forth The findings of the Project's ESIA Report, including the identified impacts and proposed mitigation Measures Details on Project-related employment and business opportunities, including the scale, scope and process of accessing these opportunities Details on broader planned benefits of the Project, with an emphasis on avoiding setting unrealistic expectations of such benefits Details on the proposed location of the nearest railway crossing points Details related to Project health and safety, including potential safety risks associated with active Project sites, Measures taken to minimise 	<ul style="list-style-type: none"> Any general comments, questions or concerns in response to updates on the Project and other details provided Feedback on the findings of the Project's ESIA Report, including the identified impacts and proposed mitigation Measures, to be reflected in updated versions of the Project's Environmental and Social Management Plans (ESMPs) where relevant and appropriate Feedback on the proposed location of the nearest railway crossing points, particularly in terms of the suitability of these crossing points for pastoralists and their livestock, alongside whether the locations of the crossing points are placed in ideal locations to access sites of cultural heritage significance In addition to the above, further information from stakeholders will 	<ul style="list-style-type: none"> Record of stakeholder s' comments, questions or concerns (recorded using the template in Appendix 5) Record of stakeholders' attendance (recorded using the template in Appendix 4) Updated Stakeholder Engagement Register to include stakeholder engagement activities undertaken Photographs (subject to stakeholders' permission) 	<p>34,200,000</p> <p>(2 meetings in 122 communities @ 100,000 NGN per meeting)</p> <p>5,000,000 for logistics for each round of meeting</p>

Activity	Timing	Targeted Stakeholders	Engagement Method	Engagement Materials	Information to be Provided	Feedback to be Sought	Outputs	Implementation Cost (NGN)
					<p>these and the role that community members must play in this context</p> <ul style="list-style-type: none"> Information about the CGM, in particular the process for reporting grievances When engaging with local transport workers, the provision of details about how their livelihoods may be impacted during the operation of the rail line shall be prioritised 	<p>be gathered with respect to important cultural heritage sites / assets in the PACs, alongside security risks (to feed into Project security risk assessments and the management of cultural heritage impacts respectively)</p> <ul style="list-style-type: none"> When engaging with the affected communities (including pastoralists) and local neighbourhood watch / 'vigilante' groups, particular feedback shall be sought on whether any potential or actual conflict is arising from the Project's land acquisition process and its impact on livestock migration and grazing routes 		

Table 6-2: Engagement Activities to be Undertaken during the Project's Construction Phase

Activity	Timing	Targeted Stakeholders	Engagement Method	Engagement Materials	Information to be Provided	Feedback to be Sought	Outputs	Implementation Cost (NGN)
Media campaign to announce the start of the Project's construction phase to a wider audience	<i>Shortly before the start of the Project's construction phase</i>	<ul style="list-style-type: none"> All stakeholders Members of the public (general) 	<ul style="list-style-type: none"> Announcement of the start of construction on the Project's website Media advertisements (e.g. on radio, in newspapers, on television) announcing the start of Project operations 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> A start date for Project construction Details about planned construction activities and contact information for any enquiries 	<ul style="list-style-type: none"> No specific feedback sought; contact details to be provided for stakeholders to use to make further enquiries 	<ul style="list-style-type: none"> No specific outputs sought; communications received in response to the media campaign to be recorded, however, in the Stakeholder Engagement Register (see Appendix 6) 	7,650,000.00

Activity	Timing	Targeted Stakeholders	Engagement Method	Engagement Materials	Information to be Provided	Feedback to be Sought	Outputs	Implementation Cost (NGN)
Quarterly Project Update Meeting with Stakeholders	As required during construction	<ul style="list-style-type: none"> Members of the PACs, including pastoralists and pastoral leaders, traditional leaders and religious leaders Other key stakeholders such as governmental authorities (including those with responsibilities for ensuring public safety and security), civil society organisations (including local neighbourhood watch / 'vigilante' groups) and local transport workers 	<ul style="list-style-type: none"> One-to-one, small group and community meetings; the latter shall include meetings with members or representatives of vulnerable groups in the affected communities (as identified in Section 4.1.2) and those whose livelihoods revolve around the provision of transportation services 	<ul style="list-style-type: none"> PowerPoint presentations, posters, maps, information leaflets and other materials, as necessary, depending on the stakeholders involved 	<ul style="list-style-type: none"> Variable depending on the purpose of the engagement and stakeholder but may include, for example, updates on the Project (particularly if there are any material changes in design or planned construction activities) and the reiteration of information about Project-related employment and business opportunities, broader Project benefits (without setting unrealistic expectations), health and safety risks and management Measures associated with active Project sites, alongside the CGM When engaging with local transport workers, the provision of details about how their livelihoods may be impacted during the operation of the rail line shall be prioritised 	<ul style="list-style-type: none"> Any general comments, questions or concerns in response to updates on the Project and information reiterated to stakeholders When engaging with governmental authorities and local neighbourhood watch / 'vigilante' groups, further information will be gathered with respect to security risks (to feed into Project security risk assessments) When engaging with the affected communities (including pastoralists) and local neighbourhood watch / 'vigilante' groups, particular feedback shall be sought on whether any potential or actual conflict is arising from the Project's land acquisition process and its impact on livestock migration and grazing routes 	<ul style="list-style-type: none"> Record of stakeholders' comments, questions or concerns (recorded using the template in Appendix 3) Record of stakeholders' attendance (recorded using the template in Appendix 4) Updated Stakeholder Engagement Register to include stakeholder engagement activities undertaken Photographs (subject to stakeholders' permission) 	32,000,000 (2,000,000 per quarterly engagement for four years)
Publication of Annual Engagement Report	Annually during construction	<ul style="list-style-type: none"> All stakeholders Members of the public (general) 	<ul style="list-style-type: none"> Publication of Annual Engagement Report on Project's website Printing and provision of hard copies of Annual 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> The Annual Engagement Report Where to find a copy of the Annual Engagement Report (e.g. Project web address) 	<ul style="list-style-type: none"> No specific feedback sought; contact details to be provided for stakeholders to use to request further information or a hard copy of the Annual Engagement Report 	<ul style="list-style-type: none"> No specific outputs sought; communications received with respect to the Annual Engagement Report to be recorded, however, in the 	<ul style="list-style-type: none"> 10,500,000 (for 200 copies @50,000 per copy plus 500,000 for distribution)

Activity	Timing	Targeted Stakeholders	Engagement Method	Engagement Materials	Information to be Provided	Feedback to be Sought	Outputs	Implementation Cost (NGN)
			<p>Engagement Report upon stakeholders' request</p> <ul style="list-style-type: none"> Media advertisements (e.g. on radio, in newspapers) announcing publication of Annual Engagement Report and where the report can be found 		<ul style="list-style-type: none"> Contact details to be used to request further information or a hard copy of the Annual Engagement Report 		<p>Stakeholder Engagement Register (see Appendix 6)</p>	
Construction completion engagements with the PACs and other key stakeholders	<i>Shortly prior to the completion of the Project's construction phase</i>	<ul style="list-style-type: none"> Members of the PACs, including pastoralists and pastoral leaders, traditional leaders and religious leaders Other key stakeholders such as governmental authorities (including those with responsibilities for ensuring public safety and security), civil society organisations (including local neighbourhood watch / 'vigilante' groups) and local transport workers 	<ul style="list-style-type: none"> One-to-one, small group and community meetings; the latter shall include meetings with members or representatives of vulnerable groups in the affected communities (as identified in Section 4.1.2) and those whose livelihoods revolve around the provision of transportation services 	<ul style="list-style-type: none"> PowerPoint presentations, posters, maps, information leaflets and other materials, as necessary, depending on the stakeholders involved 	<ul style="list-style-type: none"> The schedule for the completion of construction works and start of operations Information about the CGM, in particular the process for reporting grievances When engaging with local transport workers, the provision of details about how their livelihoods may be impacted during the operation of the rail line shall be prioritised 	<ul style="list-style-type: none"> Any general comments, questions or concerns in response to the completion of the Project's construction phase When engaging with governmental authorities and local neighbourhood watch / 'vigilante' groups, further information will be gathered with respect to security risks (to feed into Project security risk assessments) When engaging with the affected communities (including pastoralists) and local neighbourhood watch / 'vigilante' groups, particular feedback shall be sought on whether any potential or actual conflict is arising from the Project's land acquisition process and its impact on livestock migration and grazing routes 	<ul style="list-style-type: none"> Record of stakeholders' comments, questions or concerns (recorded using the template in Appendix 5) Record of stakeholders' attendance (recorded using the template in Appendix 4) Updated Stakeholder Engagement Register to include stakeholder engagement activities undertaken Photographs (subject to stakeholders' permission) 	<p>17,100,000</p> <p>(meetings in 121 communities @ 100,000 NGN per meeting, plus, provisional 5,000,000 for logistics)</p>

Table 6-3: Engagement Activities to be Undertaken during the Project's Operations Phase

Activity	Timing	Targeted Stakeholders	Engagement Method	Engagement Materials	Information to be Provided	Feedback to be Sought	Outputs	Implementation Cost (NGN)
Media campaign to announce the completion of the Project and start of operations to a wider audience	<i>Shortly before the start of the Project's operations</i>	<ul style="list-style-type: none"> All stakeholders Members of the public (general) 	<ul style="list-style-type: none"> Announcement of the start of operations on the Project's website Media advertisements (e.g. on radio, in newspapers, on television) announcing the start of Project operations 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> A start date for Project operations Details about planned operations, including number of trains per day, alongside the official operator of the Project and contact information for any enquiries 	<ul style="list-style-type: none"> No specific feedback sought; contact details of operator to be provided for stakeholders to use to make further enquiries 	<ul style="list-style-type: none"> No specific outputs sought; communications received in response to the media campaign to be recorded, however, in the client Stakeholder Engagement Register 	7,650,000.00
Start of operations engagements with the PACs and other key stakeholders	<i>Shortly after the start of the Project's operations</i>	<ul style="list-style-type: none"> Members of the PACs, including pastoralists and pastoral leaders, traditional leaders and religious leaders Other key stakeholders such as governmental authorities and civil society organisations 	<ul style="list-style-type: none"> One-to-one, small group and community meetings; the latter shall include meetings with members or representatives of vulnerable groups in the affected communities (as identified in Section 4.1.2) 	<ul style="list-style-type: none"> PowerPoint presentations, posters, maps, information leaflets and other materials, as necessary, depending on the stakeholders involved 	<ul style="list-style-type: none"> Update on planned operations, including the number of trains per day Details on Project-related employment and business opportunities, including the scale, scope and process of accessing these opportunities Details related to Project health and safety, including the potential safety risks of operating trains and how such safety incidents can be avoided Details regarding rules of access to and use of land within the Project's Right of Way (RoW) Details regarding the nearest railway crossing points and importance of using these Information about the CGM, in particular the process for reporting grievances 	<ul style="list-style-type: none"> Any general comments, questions or concerns in response to the Project's operations phase Stakeholders' expectations with respect to their engagement with Project personnel during operations 	<ul style="list-style-type: none"> Record of stakeholders' comments, questions or concerns Record of stakeholders' attendance Updated Stakeholder Engagement Register to include stakeholder engagement activities undertaken Photographs (subject to stakeholders' permission) 	12,850,000.00
Safe stations and trains campaign	<i>Shortly after the start of the Project's operations (first year only)</i>	<ul style="list-style-type: none"> Members of the public (general) using the train services and railway stations 	<ul style="list-style-type: none"> Publishing of safety posters and verbal announcements on trains and in stations 	<ul style="list-style-type: none"> Safety posters Safety announcements 	<ul style="list-style-type: none"> Details regarding the appropriate and acceptable behaviours of passengers, alongside contact details for the official operator of the Project and relevant local police authorities for any enquiries or to report an issue 	<ul style="list-style-type: none"> No specific feedback sought; contact details of operator and relevant local police authorities to be provided for stakeholders to use to make further enquiries or report an issue 	<ul style="list-style-type: none"> No specific outputs sought; communications received in response to the safe stations and trains campaign to be recorded, however, in the client Stakeholder Engagement Register 	17,100,000

KEY CONSIDERATIONS

Inclusion of Women and Vulnerable Groups

During the social baseline surveys undertaken as part of the preparation of the Project's ESIA, several vulnerable groups were identified in the PACs, including women, youths, persons with disabilities, the elderly, the Fulani and Tuareg. Consistent with the requirements of GIIP (see Section 4.12), additional measures will be implemented to ensure that the activities undertaken with stakeholders during engagement throughout the pre-construction, construction and operations phases of the Project are inclusive and enable such groups to participate equal to other members of the PACs. To this end:

- Consideration will be given as to whether vulnerable groups need to be engaged with separately from the wider community. At the time of writing, it is anticipated that separate, targeted engagements with vulnerable groups shall be required; therefore, provisions have been made in Table 6-1 to Table 6-3 (Section 6.2) accordingly.
- The location of engagements will be reviewed to ensure they are accessible for vulnerable groups, particularly those living with disabilities. In the case of the latter, consideration will be given to providing transport assistance to reduce barriers to participation.
- The timing of engagements will be reviewed to ensure that any potential interferences with the daily schedules and commitments of women, for example, are minimised.
- The approaches to engaging with vulnerable groups will be modified, as necessary, to ensure that vulnerable groups are able to comprehend the information provided and develop an informed response. For example, verbal rather than written forms of communication will be relied upon when interacting with women, recognising that they are particularly affected by low levels of literacy. Moreover, announcements concerning key Project information, such as how to access Project-related employment and business opportunities, shall be made on local radio.
- More time will be provided for engagements, where necessary, to allow vulnerable groups sufficient time to understand and respond to the information provided to them.
- Consideration will be given to who, from the Project's team of CLOs, will engage with the vulnerable groups. Female consultants and CLOs, for example, shall lead engagement activities specifically involving women.
- Advice and support will be sought from organisations who will closely with and represent vulnerable groups, as necessary, to further the effectiveness of engaging with these stakeholders.

As noted in Section 4.1.2, there is the potential that the Fulani may experience difficulties in accessing information about the Project and participating in Project-related engagement activities as they are traditionally nomadic and semi-nomadic and may thus be absent from the PACs at the time of the engagements. Additional Measures will be implemented to mitigate this risk, such as determining when these stakeholders will be present in the PACs (e.g. via engagements with traditional leaders) and organising additional engagement activities, as necessary, in the PACs at a

time when the Fulani are present.

Data Protection and Confidentiality

Personal information on stakeholders gathered during the Project's pre-construction, construction and operations phases shall be managed in accordance with legal, international and internal corporate requirements for data protection and confidentiality. This duty extends to all those involved in the activities presented in Section 6.2, including Mota-Engil Nigeria Limited's contractors.

The Measures to be implemented to align with the requirements stated and ensure the effective safeguarding of personal information on stakeholders are as follows:

- The amount of information collected on stakeholders will be limited to that which is actually needed.
- Access to records of engagements (e.g. minutes, attendance lists) and the Stakeholder Engagement Register will be password-protected and limited to a select number of individuals.
- Information about stakeholders will be shared on a need-to-know basis only.
- Personal information will not be shared with third parties unless required to do so by law, or authorised by the stakeholder.
- Personal information will only be processed in accordance with the specific purpose for which it was intended.
- Where stakeholders' questions, concerns or feedback is disclosed in documents (e.g. monitoring reports), the stakeholder will be anonymised to ensure their identity remains protected.

Health and Safety

As noted in Section 6.1, all engagement activities related to the pre-construction, construction and operations phases of the Project will be conducted in a manner which seeks to protect the health and safety of all those involved. In this context, any national COVID-19 restrictions and guidelines that are applicable in Nigeria and the Republic of Niger at the time of the proposed activities will be observed. Good practices to minimise the risk of disease transmission shall also be applied, which may include, for example:

- asking participants to maintain a safe social distance of 2 metres during each activity;
- limiting the number of participants invited to attend each activity;
- cleaning venues before and after their use;
- using outdoor venues wherever possible or, where activities must be held indoors, making efforts to ventilate the venues (e.g. by opening windows and doors); and
- distributing personal protective equipment (PPE) such as facemasks and hand gels to participants at the start of each activity and encouraging their use for the duration of the engagement.

Safety measures related to COVID-19 are flexible, being updated by national governments on a regular basis to reflect the evolution of the disease within their jurisdiction over time. The situation with respect to COVID-19 in Nigeria and the Republic of Niger will be reviewed prior to the conduct of engagement activities and alternative methods of engagement will be identified where it is considered unsafe and inappropriate to meet with stakeholders in person. In this event, this SEP will be updated accordingly. The internal corporate requirements of Mota-Engil with respect to COVID- shall also be consulted at this stage.

Security

The Project is embedded in a fragile security context along the Nigerian component of the route. As such, there may be numerous risks to the safety and security of all those involved in stakeholder engagement during the pre-construction, construction and operations phases of the Project. To manage these risks, a security risk assessment shall be undertaken during the organisation of activities and Measures will be identified and implemented as necessary, the latter of which may include hiring security personnel to accompany the Project's CLOs when in the field. Where such personnel are required, a thorough due diligence process will be undertaken to ensure that those providing security are not implicated in past abuses and are trained adequately in the use of force (including firearms) and appropriate conduct towards members of the PACs in line with GIIP (e.g. the Voluntary Principles on Security and Human Rights). Only security personnel which have been trained in such areas, in line with the requirements of GIIP, will be contracted to provide security during the engagement activities. Safety will be a priority at all times and engagement activities will be subject to alteration, postponement and cancellation in light of security risks and incidents, as necessary.

7 ROLES AND RESPONSIBILITIES

The roles and responsibilities with respect to implementing and monitoring the various aspects of stakeholder engagement during the pre-construction, construction and operations phases of the Project are presented in Sections 2.3.

7.1 PRE-CONSTRUCTION AND CONSTRUCTION PHASE

Table 7-1 presents the stakeholder engagement roles and responsibilities during the Project's pre-construction and construction phases.

Table 7-1: Pre-Construction and Construction Phase Role and Responsibilities

Role	Responsibilities
Federal Ministry of Transport	
Senior Management (Project Manager)	<ul style="list-style-type: none"> • assisting with the resolution of issues of material concern reported by the Construction E&S Manager, which require decisions which cannot be made at lower levels of management; and • overseeing the implementation of the Project's ESMS
Construction E&S Manager (E&S Manager)	<ul style="list-style-type: none"> • implementing the Project's ESMS, within which this SEP is included; • ensuring that regular meetings are held with those with responsibilities in other areas (e.g. human resources, supply chain and procurement, security) to ensure cross-departmental collaboration and alignment¹; • reviewing and updating this SEP with the support of the CLO Team Lead; • taking a lead role in engagements with institutional stakeholders at the national, state, local level governmental authorities as well as the PAPs and PAC levels; • undertaking monthly reviews of the updated Stakeholder Engagement Register (Appendix 6) with the CLO Team Lead to verify that the requirements of this SEP are being implemented, as well as identifying and implementing corrective actions to address gaps where they are identified; • monitoring and evaluating stakeholder engagement processes in line with the Key Performance Indicators (KPIs) defined in this SEP; • reporting on stakeholder engagement, based on engagement records and reports, alongside the results of monitoring and evaluation, to internal and external stakeholders; • ensuring stakeholder engagement is a permanent item on the agendas of senior management; • escalating, to senior management, any material issues of concern reported by the CLO Team Lead and CLOs; and • ensuring corrective actions identified by senior management to resolve material issues are implemented.
Mota-Engil Nigeria Ltd	<ul style="list-style-type: none"> • Implement the SEP on behalf of FMoT

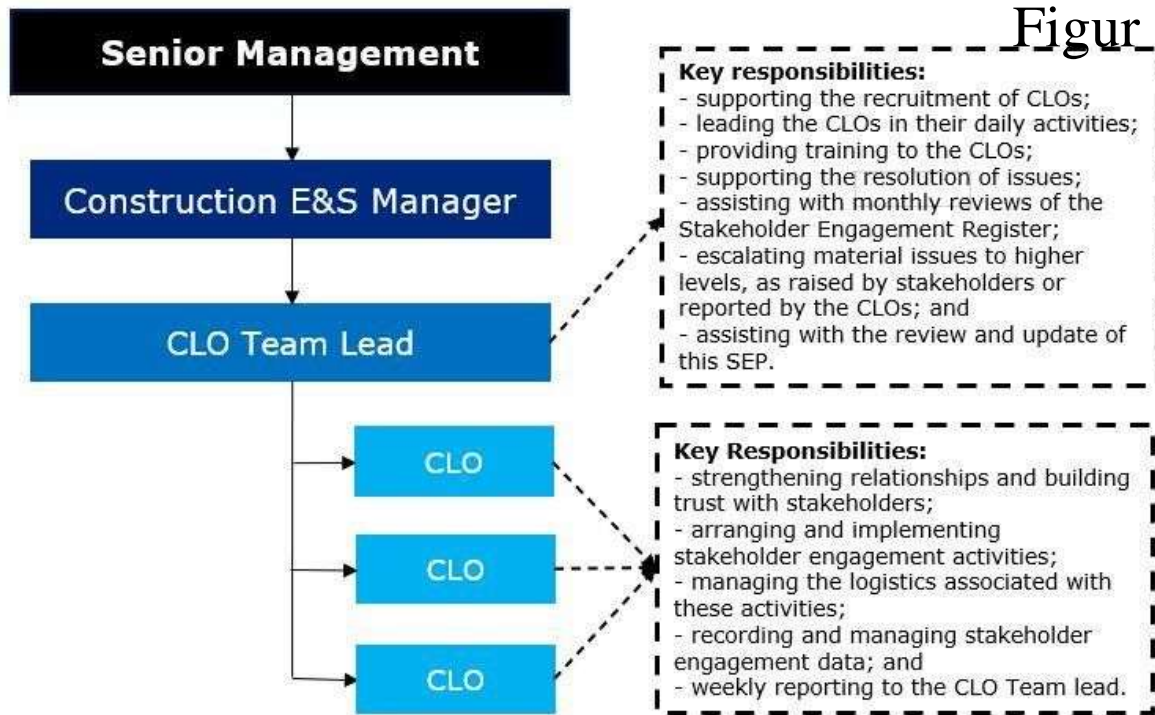
CLO Team Lead	<ul style="list-style-type: none"> • supporting the hiring of the CLO team, including ensuring appropriate representation from the different ethnic groups across the Project and equal representation of men and women; • providing direction to CLOs on their day-to-day activities, in line with the requirements of the SEP; • providing training to CLOs on GIIP applicable to stakeholder engagement; • supporting the resolution of issues; • assisting the Construction E&S Manager with monthly reviews of the updated Stakeholder Engagement Register (Appendix 6), as well as identifying and implementing corrective actions to address gaps in compliance where identified; • escalating, to the Construction E&S Manager, any material issues of concern raised by stakeholders or any challenges experienced in adhering to the provisions of this SEP (Red Flag Reports and Quarterly Progress Reports) • assisting the Construction E&S Manager with the review and update of this SEP.
CLOs	<ul style="list-style-type: none"> • contributing to the strengthening of relationships, building of trust and improvement in communications between stakeholders, in particular the affected communities, and the Project; • reinforcing a positive image of the Project in the affected communities; • assisting with the ongoing identification and analysis of stakeholders as part of the periodic review and update of this SEP; • arranging and implementing the pre-construction and construction phase stakeholder engagement activities in line with the provisions of this SEP; • managing the logistics associated with the stakeholder engagement activities (e.g. contacting stakeholders to arrange activities, identifying suitable venues and so forth); • recording and managing the data gathered during the stakeholder engagement activities in line with the provisions of this SEP; • in line with one of the commitments made in the Project ESIA, actively monitoring for evidence of GBVSEA and other inappropriate behaviours caused by Project workers in the affected communities, including identifying 'hot spot locations' as part of ongoing engagement activities (see Appendix 2); • regular (i.e. weekly) reporting to the CLO Team Lead on engagement activities undertaken (including stakeholders involved, numbers in attendance, topics discussed, any issues encountered and so forth); and • interfacing with the teams responsible resettlement planning and implementation, alongside livelihood restoration activities.

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¹ The alignment of different departments (or equivalent units) within the Project team is essential to building and maintaining a constructive relationship with stakeholders.

An organogram illustrating the roles and responsibilities related to stakeholder engagement during the Project's pre-construction and construction phases is presented in Figure 3-1. Given the key

roles of the CLO Team Lead and CLOs with respect to stakeholder engagement, the responsibilities associated with these roles are summarised in the organogram. Three positions for CLOs have been included in the organogram for illustrative purposes; however, the organogram will be updated in subsequent iterations of this SEP, once the number of CLOs required has been confirmed. Depending on the sequencing of the construction phase activities, it will likely be necessary to appoint a dedicated team of CLOs for different sections of the Project route.



The key skills and requirements of the CLOs include:

- excellent interpersonal skills, with an ability to interact and liaise with a wide range of people;
- excellent writing skills;
- at least basic proficiency in computer software such as Microsoft Word and Microsoft Excel;
- knowledge of and familiarity with the communities in the vicinity of the Project, including local languages, customs and traditions; and
- ideally, experience in engaging with stakeholders, managing relations with communities and assisting with conflict/dispute resolution on previous projects (in particular linear transport infrastructure projects in Nigeria or West Africa).

Collectively, the team of CLOs established for the Project should likely ensure appropriate representation of the different ethnic groups from across the Project to ensure the team has the resources required to properly understand and engage with the affected communities, and to avoid appearing biased towards one particular group. The team of CLOs should also consist if possible, of a balance of men and women.

To build the capacity of the CLOs, training GIIP should be required, including with respect to areas such as consultation and participation, planning and logistics, managing expectations and conflict situations, negotiating and problem-solving, communications, report writing, data management and analysis. This may be achieved through various channels, including external training courses, internal training workshops and sessions, on-the-job training, coaching and feedback sessions.

7.2 OPERATIONS PHASE

Table 7-2 presents the stakeholder engagement roles and responsibilities during the Project's operations phase.

Table 7-2: Operations Phase Roles and Responsibilities

Role	Responsibilities
Federal Ministry of Transport (Project Operator)	
Senior management	<p>The responsibilities of senior management during operations shall be similar to those described for senior management during the Project's pre-construction and construction phases and shall include:</p> <ul style="list-style-type: none"> • assisting with the resolution of material issues reported by the Operations E&S Manager; and • overseeing the Operations E&S Manager's implementation of the Project's ESMS.
Operations E&S Manager	<p>The responsibilities of the Operation E&S Manager shall be similar to those described for the E&S Manager during the Project's pre-construction and construction phases and shall include:</p> <ul style="list-style-type: none"> • implementing the Project's ESMS, inclusive of this SEP; • ensuring regular meetings with those working in areas outside of E&S to promote cross-departmental collaboration and alignment; • the review and update of this SEP; • overseeing all planned and in process stakeholder engagement activities; • taking a lead role in engagements with national and regional / state level governmental authorities; • overseeing the work of the Project's CLOs; • monitoring and evaluating stakeholder engagement processes in line with the KPIs defined in this SEP; and • escalating issues of material concern to senior management and ensuring that corrective actions identified to address such issues are implemented.
External Relations Officers (or equivalent personnel)	<ul style="list-style-type: none"> • arranging and implementing the operations phase stakeholder engagement activities; • managing the logistics associated with the above activities; • recording and managing the data gathered during the above activities; • regular reporting to the Operations E&S manager; • escalating issues of material concern to the Operations E&S Manager; • assisting the Operations E&S Manager with the review of the updated Stakeholder Engagement Register (Appendix 6) on a regular basis and helping to identify and implement corrective actions where appropriate; and • helping the Operations E&S Manager to review and update this SEP.

8 EXTERNAL GRIEVANCE MECHANISM

There is no ideal model or one-size-fits-all approach to grievance resolution. The best solutions to conflicts are generally achieved through localized mechanisms that take account of the specific issues, cultural context, local customs, and project conditions and scale.

In its simplest form, grievance mechanisms can be broken down into the following primary components:

- Receiving and registering a complaint.
- Screening and assessing the complaint.
- Formulating a response.
- Selecting a resolution approach.
- Implementing the approach.
- Announcing the result.
- Tracking and evaluating the results.
- Learning from the experience and communicate back to all parties involved.
- Preparing a timely report to management on the nature and resolution of grievances.

The best solutions to conflicts are generally achieved through localized mechanisms that take account of the specific issues, cultural context, local customs, and project conditions and scale. For the Kano-Maradi Railway project, all the grievances will be channeled via the CLO. It is recognized that the formal legal mechanisms for grievance redress tend to be lengthy and acrimonious procedures, and thus an informal grievance redress mechanism through the contractor will be established. This unit will work with a committee comprising administrative head of local governments; community/village chiefs, NGOs/CBOs and other relevant Government organs that will be set-up to address complaints.

Three levels of grievance redress channels have been identified and will be operationalized for the transmission line project:

First Level GRM: at the Community Level (Community Resettlement Committee (CRC)

Complaints regarding project implementation and activities arising from the project area shall be channeled to the Village head, who shall convene the CLO at that level to review and address the complaint. The Village head shall head this committee while membership of the committee will consist of those outlined in the table 8-1;

Table 8-1: Membership of Community Level

S/N	Membership	No of Persons	Designation
1	Community Leader	1	Chairman
2	CLO	1	Member
3	Representative Community Development Unit (LGA)	1	Member
4	2 Representatives of PAPs (male and Female)	2	Member

This committee will be expected to report to the contractor. In addition, complaint box will be placed in the Community leader’s palace, where complaints from PAPs can be dropped without retribution. The complaints are received (in written, verbal or electronic form) at designated points at community Level.

After registering the complaint in the Grievance Redressal Registration and Monitoring Sheet, the Chairman of the committee would study the complaint made in detail and issue an acknowledgement letter within five working days, including an outline of the complaint review and appeal process. A written response shall be issued within two weeks. The chairman shall coordinate a meeting with the aggrieved party to address such issues. The deliberations of the meetings and decisions taken are recorded.

The resolution at the first tier will be normally done within 14 working days and notified to the concerned through a disclosure form. Should the Grievance not be solved within this period, this would be referred to the next level of Grievance Redressal. However, if the village head/chief feels that adequate solutions are being worked out and it would require a few more days for actions to be taken, he can decide on retaining the issue at the first level by informing the complainant accordingly. However, if the complainant requests an immediate transfer of the issue to the next level, it would be accepted, and the issue would be taken to the next channel. But in any case, if the issue is not addressed within 21 days, it needs to be taken to the next level.

Second Level GRM: State Level (Resettlement Management Committee (RMC))

The Resettlement Management Committee (RMC) shall receive, hear and address complaints arising from the project implementation. The Director of Lands shall head this committee while membership of the committee shall be as outlined in table 8-2;

Table 8-2: Membership of the 2nd Level GRC

S/N	Membership	No of Persons	Designation
1	Director of Lands	1	Chairman
	Contractor	1	Member
3	RAP Implementation Consultant	1	Member
4	CLO	1	Secretary
5	Representative of the Emir	1	Member
6	Security Representative (NSCDC, DSS or Police)	2	Member
7	2 Representatives of PAPs (Male and Female)	2	Members
8	Witness NGO	1	Member

If the complainant is not satisfied by the first level response nor has a complaint regarding their decision-making process, they can directly write to the 2nd GRC. All complaints submitted to the GRC shall be logged with a unique ID code. Complainants shall receive an acknowledgement letter within 5 working days, including an outline of the complaint review and appeal process. The complaint shall be filed according to a tracking system, so that complaints are classified, and responded to consistently. Furthermore, the complaint shall be discussed within the committee and responded to in writing within 2 weeks. The committee shall also convene a meeting of the aggrieved parties if required. The GRC shall undertake a six-monthly internal review of the complaint handling mechanism, and make necessary corrections, if need be.

The committee will hold the necessary meetings with the complainant and the concerned officers and attempt to find a solution acceptable at all levels. CLO would record the minutes of the meeting. The decisions of the committee are communicated to the complainant formally and if he accepts the resolutions, the complainant's acceptance is obtained on a disclosure form.

If the complainant does not accept the solution offered by the committee, then the complaint is passed on to the next level / or the complainant can reach the next level. The Chairman of the committee would be required to forward the issue to the next level through the Secretary of the GRC to facilitate in exploring a solution to this at this level before transferring it to the next level. In any case, the case should be forwarded to the next level if no solution is reached within 14 days of the case reaching the second level and, in a case(s), nearing the required solution, it can be retained to an extent of 21 days.

The decisions of the 2nd level GRC level would be final from the Project side and the Complainant may decide to take a legal or any other recourse if he /she is not satisfied with the resolutions due to the deliberations of the Second Level GRC. If affected person is not satisfied with the decision received, he/she can, as a last resort, appeal to a court of competent jurisdiction.

Third **Level GRM**: National Level (Resettlement Steering Committee (RSC))

This committee shall receive, hear and address complaints arising from the project implementation. The Permanent Secretary, FMOT shall head this committee while membership of the committee shall be as outlined in table 8-3.

Table 8-3: Membership of the 3rd Level GRC

S/N	Membership	No of Persons	Designation
2	Permanent Secretary, FMOT	1	Chairman
	Contractor (CEO)	1	Member
9	RAP Implementation Consultant (CEO)	1	Member
1	CLO	1	Secretary
1	Director of Lands (FMWH)	1	Member
1	Security Representative (NSCDC, DSS or Police)	2	Member
1	2 Representatives of PAPs (Male and Female)	2	Members
1	Witness NGO	1	Member

If the complainant is not satisfied by the second level response nor has a complaint regarding their decision-making process, they can directly write to the 3rd level GRC, the RSC. All complaints submitted to the RSC shall be logged with a unique ID code. Complainants shall receive an acknowledgement letter within 5 working days, including an outline of the complaint review and appeal process. The complaint shall be filed according to a tracking system, so that complaints are classified, and responded to consistently. Furthermore, the complaint shall be discussed within the committee and responded to in writing within 2 weeks. The committee shall also convene a meeting of the aggrieved parties if required. The RSC shall undertake a six-monthly internal review of the complaint handling mechanism, and make necessary corrections, if need be.

The committee will hold the necessary meetings with the complainant and the concerned officers and attempt to find a solution acceptable at all levels. CLO would record the minutes of the meeting. The decisions of the RSC are communicated to the complainant formally and if he accepts the resolutions, the complainant's acceptance is obtained on a disclosure form.

The decisions of the 3rd level GRC level would be final from the Project side and the Complainant may decide to take a legal or any other recourse if he /she is not satisfied with the resolutions due to the deliberations of the Second Level GRC. If affected person is not satisfied with the decision received, he/she can, as a last resort, appeal to a court of competent jurisdiction.

Grievance Mechanisms

During implementation of the project activities, it is possible that disputes/disagreements between the contractor and the PAPs /communities will occur especially regarding employment of host communities, compensation, boundaries, destruction of crops or land, etc. There are great challenges associated with grievance redress especially in a project of this magnitude.

The practice of grievance arbitration over resettlement issues in Nigeria is conducted within the framework of the Land Use Act (LUA) of 1978, reviewed under CAP 202, 1990. Two stages have been identified, and shall apply, in the grievance procedure: customary mediation and judiciary hearings.

Customary Mediation

Procedures for grievances will be clearly explained during community meetings. At the village levels, a series of customary avenues exists to deal with dispute resolutions. Those avenues shall be employed, when and where it is relevant as a “court of first appeal”.

Such customary avenues shall provide a first culturally and amicable grievance procedure that will facilitate formal and/or informal grievance resolution for grievances such as:

- i. Wrongly recorded personal or community details;
- ii. Wrongly recorded assets including land details and/or affected acreage;
- iii. Change of recipient due to recent death or disability;
- iv. Recent change of asset ownership;
- v. Wrong computation of compensation; and
- vi. Name missed out of register, etc.

Court of Law

The judicial process in accordance with applicable laws will be followed and the law courts will pass binding judgment on the matter.

Grievance Resolution Procedures

The first level is the Village/District Heads or the contractor: The aggrieved person shall first report the matter to the community chief for resolution. Issues that can be resolved at this level include, employment issues, ownership tussle, management of deceased property, boundary issues, etc. If the issue is not resolved at this stage, it can then be escalated to customary mediation described and if still no acceptable resolution is achieved, the parties may choose to go to court in accordance with laws of the Federal Republic of Nigeria. Figure 8.1 illustrates this mechanism.

Figure 8-1: Grievance Resolution Procedure



9 MONITORING, EVALUATION AND REPORTING

In order to record activities and assess the effectiveness of this SEP and associated community dialogue activities, MENG will implement a data management and monitoring process as outlined below.

In addition, this section includes mechanisms for reporting to external stakeholders as an integral step in building relationships with stakeholders and promoting understanding between MENG, FMoT and stakeholders.

9.1 DATA MANAGER

Stakeholder engagement activities will be documented and filed in order to track and refer to records when required and ensure delivery of commitments made to stakeholders. The following stakeholder community dialogue records and documentation will be used and maintained by Stakeholder engagement activities will be documented and filed in order to track and refer to records when required and ensure delivery of commitments made to stakeholders. The following stakeholder community dialogue records and documentation will be used and maintained by the Project:

- Attendance List- Used to collect the meeting attending stakeholder contact details (Annex 4)
- Meeting minute template: Used to collect meeting minutes to be filed within the stakeholder database (Annex 5)
- Stakeholder engagement register: On-going updates to the stakeholder register,

including key contacts and contact details (telephone number, email address etc.) as additional stakeholders are identified (Annex 6).

MENG will develop log documentation used to record, store and analyse the Stakeholder Engagement activities, including the grievances, and used to track frequency of meetings. A commitment register will be used to track of the commitments made to the stakeholders when needed.

Records will be reviewed on a quarterly basis to ensure that information is being recorded accurately and information maintained. Commitments and actions recorded during community interaction activities will also be regularly reviewed to ensure they are taken forward.

9.2 INTERNAL REPORTING

The following internal reports will be developed:

- Red Flag Reports: Weekly or daily reports for urgent items or incidents of significant nature. These red flag reports will be prepared by MENG's CLO Team lead and sent to the Project Manager, which will act and/or escalate if necessary.
- Quarterly Progress Reports: Internal quarterly progress reports will be prepared by MENG's CLO Team lead. These reports will summarise:
 - Engagement activities undertaken to date: stakeholders met, key topics discussed, main concerns and expectations, positioning towards Project activities;
 - Grievance mechanism: participation, main grievances received, progress
 - summary (actions to be taken and status);
 - Limitations (e.g. resources, internal alignment); and
 - Priorities for next quarter.

These reports will be discussed at quarterly meetings involving MENG and FMoT Project Managers, the hierarchy and representatives of the relevant departments. The progress reports will be circulated internally as required.

9.3 EXTERNAL REPORTING

Once consultation with stakeholders has taken place, stakeholders generally want to know which of their suggestions have been taken on board, what risk or impact mitigation measures will be put in place to address their concerns, and how, for example, projects impacts are being monitored.

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). The meeting minute will be the starting base.

MENG will also report to lenders periodically providing updates on project progress, risks and mitigation measures implemented, resettlement and livelihood restoration programmes and stakeholder feedback, amongst other issues.

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11 ANNEXURES

Annex 1- AOI Figures

Annex 2- Programme of Works (POW)

Annex 3- Attendance List

Annex 4- Attendance List template

Annex 5- Meeting Minutes

Annex 6- Stakeholder Engagement Register

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