



## Integrated Safeguards Data Sheet Restructuring Stage

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## I. BASIC INFORMATION

### 1. BASIC PROJECT DATA

Project ID	Project Name
P130840	Ibadan Urban Flood Management Project
Task Team Leader(s)	Country
Francis Samson Nkoka, Robert Curle Jesse Reid	Nigeria
Approval Date	Environmental Category
17-Jun-2014	Full Assessment (A)
Managing Unit	
SAWU1	

### PROJECT FINANCING DATA (US\$, Millions)

### 2. PROJECT INFORMATION

#### Current Program Development Objective

The project development objective is to improve the capacity of Oyo State to effectively manage flood risk in the city of Ibadan.

**Note to Task Teams:** End of system generated content, document is editable from here.

### 3. PROJECT DESCRIPTION

The project consists of three main components described in subsequent paragraphs: (i) Flood Risk Identification, Prevention and Preparedness Measures; (ii) Flood Risk Reduction; and (ii) Project Administration and Management Support.

**Component-1: Flood Risk Identification, Prevention and Preparedness Measures (Total Costs US\$43.0 million equivalent, IDA US\$43.0 million):** The objective of this component is to assess flood risk in the city of Ibadan, plan risk reduction measures, and finance preventive structural and non-structural measures to enhance flood preparedness. This



will be achieved through a number of sector-specific and specialized Master Plan studies, and by designing and establishing an integrated flood early warning and response system. This component consists of the following four sub-components:

***Sub-Component-1.1: Ibadan's Flood Risk Management Investment Program (Total US\$22.0 million equivalent, IDA US\$22.0 million equivalent)*** will finance: (a) the preparation of a flood risk management investment program building on three key city Masterplans namely: (i) Integrated Physical Master Plan, (ii) Solid Waste Management Master Plan, and (iii) Integrated Flood Risk Management Master Plan; (b) carrying out feasibility studies, detailed engineering designs and construction supervision services for works to be carried out under Component 2 of the Project; (c) preparation of emergency preparedness plan for Eleyele dam as well as Environment and Social Impact Assessments (ESIAs) and an Environmental and Social Management Plan (ESMP).

***Sub-Component-1.2: Ibadan's Long-Term Flood Resilience Strategy (Total US\$1.0 million equivalent, IDA US\$1.0 million equivalent)*** will support the preparation of a long-term Flood Resilience Strategy for Oyo State, which will provide detailed recommendations on potential sources of investment financing and appropriate tools on the policy, regulatory and institutional reforms required so as to clarify the legal and institutional mandates of the various stakeholders and MDAs with regards to flood risk management in the city of Ibadan.

***Sub-Component-1.3: Ibadan's Flood Early Warning and Response System: (Total US\$7.0 million equivalent, IDA US\$7.0 million equivalent)*** will finance: (i) the design of an Integrated Flood Early Warning and Response System for the city of Ibadan to improve flood forecasting to communities and government for response; (ii) the establishment of a flood forecasting and early warning weather forecast radar system<sup>19</sup>, and software for development of hydraulic and hydrological modeling in strengthening collaboration between the National Emergency Management Agency (NEMA) and the Oyo State Emergency Management Agency (OSEMA); and (iii) community based contingency planning and awareness, by organizing training workshops in targeted communities and Community Development Associations (CDAs) living in high risk areas of Ibadan, using the community platforms of the World Bank-funded Community and Social Development Project (CSDP) in Oyo State. Support from the local media will be sought and will build on the communications strategy developed under project preparation.

***Sub-Component-1.4: Contingency Component (US\$13.0 million equivalent, IDA US\$13.0 million equivalent)***: Following an adverse natural event that causes a major disaster, and after an official declaration of a State of Emergency by either the President of the Federal Republic of Nigeria or the Oyo State Governor, the state government may request the World Bank to approve access to project funds under this component to support mitigation, response, recovery and reconstruction. Disbursements would be made against a positive list of goods, works, and services that are required to support mitigation, response, recovery and reconstruction needs as described in the Emergency Response Operations Manual.

**Component-2: Flood Risk Reduction - (Total costs US\$149.0 million equivalent, IDA US\$149.0 million)**: The objective of this component is to ensure flood risk mitigation through structural measures by financing public infrastructure investments for flood mitigation and drainage improvements. This component consists of the following two sub-components:

***Sub-Component-2.1: Priority Infrastructure Improvement Program in "Priority Sites"*** ***(Total US\$20.9 million, IDA US\$20.9 million equivalent)***: This sub-component will finance both critical infrastructure improvements in priority secondary and tertiary sub catchments involving 14 pre-identified priority sites for rehabilitation of drainage culverts, drains, roads, including the necessary works needed to restore the flood damaged Eleyele dam for safety. The "Priority Sites" selection criteria include areas in the city of Ibadan where reconstruction would offer a no-



regret solution and that presented an opportunity to: (i) reduce localized flood risks; (ii) reconstruct flood damaged infrastructure and (iii) re-establish or improve community connectivity.

***Sub-Component-2.2: Long-term Integrated Flood Risk Mitigation Measures (Total***

***US\$128.1 million, IDA US\$128.1 million equivalent)***: This sub-component will be based on the recommendations of the Integrated Flood Risk Management Master Plan (initiated under Sub-Component-1.1), and will finance the rehabilitation and construction of robust infrastructure in “Targeted Project Sites”

- (i) **“Critical Socio-Economic Sites”** will be identified by developing contingency plans and undertaking structural improvements to critical public assets such as hospitals, airport, public buildings, including ensuring access/egress and functionality. Both the nature and the location of the infrastructure works under this sub-component will be guided by the recommendations of the Integrated Flood Risk Management Master Plan and based upon clear technical, environmental, social, economic and financial criteria. Investments under this sub-component will require the prior approval of the World Bank based on a joint program formulated by both the Oyo State Government and the respective LGAs.
- (ii) **“Urban Drainage Sites”** are “Targeted Sites<sup>20</sup> ” provided they comply with the criteria for the IUFMP investment decision support filter. These include: (i) strengthening flood resilience of key socio-economic assets within the city of Ibadan; (ii) cost-effectiveness; (iii) alignment with the recommendations of the Ibadan's Physical Masterplan and Ibadan's Integrated Flood Risk Management Masterplan; (iv) maximizing the level of risk mitigation to human lives and socio-economic economic assets; (v) prepared according to the Project Implementation Manual (PIM) with complete cost-benefit analysis, social and environmental assessments, etc.

**Component-3: Project Administration and Management Support (Total costs**

**US\$28.0 million equivalent, IDA US\$8.0 million equivalent)** will finance incremental operational costs related to the implementation of the project for goods, equipment, staff, travel, and Project Management Unit's consultant services as described below:

***Sub-component-3.1: Project Administration (Total US\$24.0 million equivalent, IDA***

***US\$4.0 million equivalent)*** will finance the procurement of office supplies and furniture, Information and Communication Technology (ICT) equipment, transport vehicles for the Project Implementation Unit (PIU), and procuring a comprehensive set of Project maps (geospatial, soil, topography, etc.); (ii) office running costs (office rent, electricity, water, internet, telephone, fuel, stationary, ICT items, etc.); (iii) the hiring of external Financial and Technical Audits which will monitor the project execution periodically and reporting directly to PIU/Steering Committee; (iv) PIU and Independent Advisory Group yearly allowances as well as the preparation and implementation of Resettlement Action Plans paid from the counterpart funding, and; (v) Fiduciary and Safeguard Training.

***Sub-component-3.2: Project Management Support (Total US\$4.0 million equivalent, IDA***

***US\$4.0 million equivalent)***: This subcomponent will finance the procurement of Project Management Consultancy for an initial period of two years renewable for an additional two years based on project implementation needs, PIU capacity building requirements, and consultant's performance. The scope of this activity involves supporting the PIU in project management activities and providing technical support for project implementation and advising on fiduciary and safeguards related matters.



## DESCRIPTION OF PROPOSED CHANGES

The proposed changes are to (a) revise the closing date of the project from June 30, 2022 to December 31, 2023 to allow compression of delayed activities under the PLT12; (b) reallocate resources from the subcomponent 1.4 Contingency Component (US\$13.0 million equivalent) to cover to the exchange losses in component 2, and (c) revise the result framework to reflect correct number on indicators that were underestimated or missed at appraisal.

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### 4. PROJECT LOCATION AND SALIENT PHYSICAL CHARACTERISTICS RELEVANT TO THE SAFEGUARD ANALYSIS (IF KNOWN)

3. The project will be located in Ibadan, Oyo state in Southwest Nigeria. Ibadan city setting is characterized by rugged terrain with wide valley plains. The city is drained by three North-South flowing river systems, namely, Ona River (Western), Ogunpa River (Central) and Ogbere River (Eastern) that flow through the city. These rivers are main drainage channels that cause flooding when not properly regulated. Settlements located in unstable and risky locations such as along Ogunpa, Kudeti, Ogbere and Orogun floodplains and the hillsides of Oke-Are, Oke-Aremo, Sapati and Mokola were seriously affected with over 120 fatalities reported during the 2011 flood incident.

The network of rivers and streams is extensive throughout the city as a result of a combination of the geology of the area and the tropical monsoon climate. Although surface water drainage into rivers happens relatively quickly, it increases the likelihood of watercourses overflowing their banks and inundating the floodplain and backwater zones. The Ona River basin has the longest river and the biggest catchment (more than 400 sq.km.). It drains a large rural area to the north of the city with two large reservoirs, the largest being Eleyele reservoir located on the northern outskirts of the city. Still further upstream, there is a smaller reservoir (Moniya) approximately one third the size of Eleyele reservoir. The discharge capacity of the Ona River downstream channel has been greatly reduced due to in-stream obstacles formed by unruly waste disposal and siltation.

Deforestation and rapid urbanization in the upper catchment of the Ona River catchment have resulted in increased soil erosion that accumulated in both the reservoir and the lower reaches of the river systems. This phenomenon coupled with unregulated solid waste disposal and lack of regular rivers cleaning and maintenance has increased the frequency of flash flood events within the city

The Ogunpa River basin drains the central area of the city and joins to the Ona River in the south of the city. This river is the smallest of the three, with a catchment size of approximately 50 sq.km. Although its tributaries consist of natural river channels within an active floodplain, the main Ogunpa river channel is largely canalized through the centre of the city. The condition of the channel, however, is poor, with evidence of large sediment deposits building up and small trees taking root along the grasses and scrub. The Ogebe River basin draining the eastern side of the city, joins the Ona River approximately nine kilometers to the south of the city and has a total catchment area of around 70 sq.km with 40 sq.km located within the city itself. All three rivers have CDSs like culverts, sluices and bridges that are meant for safe passage of torrential floods when coming down from surrounding watersheds through the city. In some cases, unsized CDSs become obstructions with heavy deposits of solid waste up front.

4. The improvement of critical infrastructure, such as river channel, culvert, and bridge, at 17 priority sites as well as rehabilitation of Eleyele dam for safety has been completed successfully. The project will finance activities of the



First Pool of Long-Term Investment (PLTI1) and Second Pool of Long-Term Investment (PLTI2) under the long-term investment for flood risk management.

## 5. ENVIRONMENTAL AND SOCIAL SAFEGUARDS SPECIALISTS ON THE TEAM

Joseph Ese Akpokodje, Environmental Specialist  
Omezikam Eze Onuoha, Environmental Specialist  
Michael Gboyega Ilesanmi, Social Specialist  
Christopher Olusola Abe, Social Specialist  
Ayse Ozgul Calicioglu Sengul, Environmental Specialist

## 6. SAFEGUARD POLICIES TRIGGERED

Safeguard Policies	Triggered	Explanation
Environmental Assessment (OP) (BP 4.01) Yes	Yes	<p>The project remains a Category A which requires EA (Full Assessment). OP 4.01 is triggered as the anticipated environmental and social risks and impacts of the project are associated with activities under Component 2 and includes civil works entailing the rehabilitation, reconstruction of vital physical infrastructure assets such as damaged roads, bridges, storm water networks, public water supply, drainage systems, river banks/embankments, damaged spillway and stilling basin to improve dam safety, removing vegetation to expose concrete surfaces, making access, and installation of safety monitoring equipment in main dam body, such as piezometers, seepage gauges, settlement gauge, and water level gauges; Civil works will likely generate adverse site-specific environmental and social risks and impacts for which mitigation measures can be designed, such as but not limited to increased level of dust, noise and vibration by machineries, disposal and management of excavated material generated from construction activities during the construction phase, pollution of surface and groundwater sources, occupational health and safety of workers both during the construction and operational phases, community health and safety risks, waste water etc. . The client has prepared an Environmental and Social Management Framework (ESMF), which has been publicly disclosed countrywide in Nigeria and at the World Bank external website prior to appraisal. The ESMF provides the criteria and procedures for screening sub-project investments and generic ESMP</p>



checklists to guide the preparation of site-specific ESIA/ESMPs. The Borrower has prepared and disclosed relevant Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plans (ESMPs) under the improvement of critical infrastructure, such as river channels, culverts, and bridges at 17 priority sites and Lot 1 and Lot 2 of First Pool of Long-Term Investment (PLTI1) while ESIA/ESMPs are being prepared under the Second Pool of Long-Term Investment (PLTI2).

Performance Standards for Private Sector Activities OP/BP 4.03	No	
Natural Habitats (OP) (BP 4.04)	Yes	The rehabilitation and operation of dam and drainage systems could affect downstream rivers, floodplains, wetlands and other fragile ecological systems thereby triggering OP4.04. The project will also include interventions in upstream catchments. The ESMF and subsequent sub-project ESIA/ESMPs contains sections detailing the mitigation measures for eliminating or minimizing potential sub-project activities impacts on the natural habitat of the catchment area of the project.
Forests (OP) (BP 4.36)	No	The project will not finance the development of forests and therefore will not envision any significant conversion or degradation of critical forest areas. The area in which this project would be implemented will not have impacts on the health and quality of forests or the rights and welfare of people and their level of dependence upon or interaction with forests.
Pest Management (OP 4.09)	No	The project will not raise potential pest management issues or finance the development the procurement of pesticides, pesticide application equipment or the use of pest management practices.
Physical Cultural Resources (OP) (BP 4.11)	Yes	The project will carry out earthworks that may impact on some physical cultural resources along the river drainages system. To mitigate this risk, specific procedures (such as chance find procedures) have been included in the ESMF and subsequent ESIA/ESMPs as required.
Indigenous Peoples (OP) (BP 4.10)	No	There are no indigenous peoples in the project area.
Involuntary Resettlement (OP) (BP 4.12)	Yes	The World Bank OP/BP 4.12 was triggered in anticipation of civil works activities under



component 2 which include the rehabilitation and reconstruction of vital physical infrastructure assets such as damaged roads, bridges, storm water networks, public water supply, drainage systems and river banks/embankments which will result in social risks and adverse impacts on people, land, economic resources and livelihoods. Subsequently, an RPF was prepared, consulted upon and disclosed in-country and the info-shop. Based upon the principles and objectives spelt out in the RPF, RAPs have been prepared under the improvement of critical infrastructure, such as river channels, culverts, and bridges at 17 priority sites and Lot 1 and Lot 2 of First Pool of Long-Term Investment (PLTI1) and Second Pool of Long-Term Investment (PLTI2). The preparation of these safeguards documents are inclusive and participatory, promoting community ownership and social accountability.

In addition, the GRM which was outlined in the RPF and discussed during the consultation sessions conducted has been outlined in the subsequent RAPs.

Safety of Dams (OP) (BP 4.37)	Yes	The project will not be directly involved in the construction of new dams. However, component 2 includes the rehabilitation of damaged spillway and stilling basin to improve dam safety. A Dam Safety Report (DSR) and Environmental and Social compliance audit of the associated facilities have been prepared by the Borrower and implemented as required.
Projects on International Waterways (OP) (BP 7.50)	No	The project will not trigger this policy because the rivers Ona, Ogbere and Ogunpa in which this project is involved are not trans boundary.
Projects in Disputed Areas (OP) (BP 7.60)	No	N/A

## II. KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

### A. SUMMARY OF KEY SAFEGUARD ISSUES

1. Describe any safeguard issues and impacts associated with the Restructured project. Identify and describe any potential large scale, significant and/or irreversible impacts.

There has been no change in the project implementation since it was approved. The project will continue to fund activities which will include the same scope at project design. The project is categorized A because of the potential adverse environmental and social impacts of the civil works activities related to rehabilitation of priority



infrastructure; undertaking structural improvements for critical public assets. The restructured project will finance activities of the Second Pool of Long-Term Investment (PLTI2), (Lots 3 & 4) under the long-term investment for flood risk management. Civil work activities will include (i) Channelization and Construction/ Rehabilitation of Hydraulic Structures on Ona River and (ii) Construction of Attenuation Dikes Around Upper and Middle Catchment of Ona River. Proposed activities may have significant adverse impacts that are sensitive, diverse, cumulative, irreversible or unprecedented. Five safeguard policies are triggered: Environmental Assessment (OP 4.01), Involuntary Resettlement (OP 4.12), Natural Habitats (OP/BP 4.04), Physical and Cultural Resources (OP/BP 4.11), and Safety of Dams (OP/BP 4.37).

The flood management interventions will take into account the existing settlements and be designed/selected in order to minimize the resettlement of inhabitants, mainly those people living in vulnerable communities and residents of newly rehabilitated and reconstructed infrastructure will be direct beneficiaries of the project.

Civil works will be funded under component 2 associated with the Restructured project, and will likely generate adverse site-specific environmental and social risks and impacts for which mitigation measures can be designed, such as, but not limited to increased level of dust, noise and vibration by machineries, disposal and management of excavated material generated from construction activities during the construction phase, pollution of surface and groundwater sources, occupational health and safety of workers both during the construction and operational phases, community health and safety risks, waste water and social risks associated with physical and economic displacement, GBV, traffic issues and security.

Progress has been demonstrated related to E&S safeguards due diligence in all sub-project worksites under the original project. The State Government has complied with all covenants specified in the Financing Agreement. Furthermore, the state Government has resolved most of the shortcomings in the adherence to the safeguards requirement. All safeguards requirements are on track. All safeguards instruments to facilitate timely implementation of activities under PLTI1 are being implemented and adhered as per the requirements. Positive progress has been noted toward the preparation of 4 safeguards instrument for Second Pool of Long-Term Investment (PLTI2). The Environmental and Social Impact Assessment (ESIA) for the Construction of Attenuation Dikes Around Upper and Middle Catchment of Ona River and Resettlement Action Plan (RAP) for the Channelization and Construction/ Rehabilitation of Hydraulic Structures on Ona River has been prepared and disclosed by the Borrower. The RAP for the Construction of Attenuation Dikes Around Upper and Middle Catchment of Ona River has been prepared and undergoing in-country disclosure, while the ESIA for the Channelization and Construction/ Rehabilitation of Hydraulic Structures on Ona River is being revised and updated by the Borrower. Following the disclosure of the 4 safeguards instruments, the next step is to discuss the instrument with the selected contractors of Lot 3a, Lot 3b, Lot 4a, and Lot 4b. The state government has committed resources for the safeguard's implementation for PLTI2. Furthermore, there is commitment from the state government to ensure effective and efficient implementation of the project activities.

There have been no major changes in the security situation that is affecting project implementation. However, a draft Construction Security Management Plan has been prepared by the Borrower to improve security management on the project. The Construction Security Management Plan is under review by the World Bank.

## 2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area.

No long term or cumulative negative environmental and social impacts of sub-projects are envisaged. However, the combination of multiple impacts from anticipated future projects may result in significant negative and/or positive environmental and social impacts that would not be expected in case of a standalone project. The ESMF's baseline study identifies relevant existing environmental and social conditions in



Nigeria. In addition, Strategic Environmental and Social Assessments (SESAs) for Ibadan City Master Plan and Ibadan Flood Risk and Drainage Master Plan have been prepared early during project implementation by the Borrower in order to inform local, state and national authorities about the meso scale environmental and social implications of the proposed operation with a medium to long term horizon.

3. Describe any potential alternatives (if relevant) considered to help avoid or minimize adverse impacts.

The ESMF and subsequent sub-project ESIA's contain sections on "Analysis of Alternatives" and concluded that the "do nothing" scenario would worsen the present situation in the proposed government infrastructure. This would imply that the Eleyele dam site would be left in its previous state, while downstream catchment areas and other targeted flood risk sites would be left in their present states with a real potential for worsening. Specifically, if the flood prone sites are left unimproved, more houses and farmlands will suffer from the recurrent flooding situation, which occurs quite frequently in Ibadan. Damage and loss rates may increase as unimproved flood prone sites will serve as death traps.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

Two framework instruments have been prepared: (i) An Environmental and Social Management Framework (ESMF) and a (ii) Resettlement Policy Framework (RPF). Both the ESMF and RPF, include specific guidance for the preparation and implementation of ESIA/ESMP and RAP/ARAP as required to ensure compliance with social and environmental safeguards requirements as well as applicable national regulations throughout implementation.

Under the restructuring, the Project will be extended to December 31, 2023 to allow compression of delayed activities under the PLTI2. Safeguard instruments including an Environmental and Social Impact Assessment (ESIA) are being prepared to address the concerns.

The project is undertaking specific measures to reduce, minimize and/or mitigate the risks related to Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA), including requirements for local hiring, use of codes of conduct and contractual sanctions, and preparation and implementation of Labor Influx Management Plan and a GBV/SEA action plan.

Furthermore, the project based GRM is receiving and addressing grievances through its multi-level appellate structure and the mechanism has received 192 complaints and resolved 184, while 8 complaints are undergoing resolution. The accessibility and systematic monitoring of the beneficiary feedback and grievance redress mechanism of the project is being enhanced through the development of multi-channel platform.

(a) Environmental Assessment (OP/BP 4.01): Under Component 2, the potential civil work activities include rehabilitation of the damaged spillway and stilling basin to improve dam safety (incl. removing vegetation to expose concrete surface, making access), immediate repairs and restoration of bridges and CDS on critical secondary and tertiary sub-catchment areas across the city of Ibadan and major rehabilitation of bridges and CDS, cleaning of river channel on main three rivers, restoring or establishing natural flood retention ponds, and undertaking flood plain management activities. The Borrower has prepared an Environmental and Social Management Framework (ESMF) which has been disclosed and includes screening checklists, criteria, procedures and specific guidance for the preparation and implementation of ESIA/ESMP and RAP/ARAP as required to ensure compliance with relevant Nigerian laws and regulations as well as World Bank's social and environmental safeguards requirements.



The ESMF ensures that the principles and procedures for the development of in-country capacity and compliance with local regulations are established and it serves as the basis for environmental assessment of all sub-projects to be carried out under the IUFMP. The ESMF also provides guidance for preparation of ESIA, ESMPs, and environmental audits. It includes a screening process that is consistent with both World Bank operational policies and Nigeria Environmental regulations, and a chapter on project processing that describes the responsibilities.

The Borrower has prepared and disclosed thirty-five Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plans (ESMPs) for site-specific interventions under the project. This include 1). ESMPs for 4 priority sites (Ola Adua culvert, Cele-Rainbow - Ojoekun - Ajanaku way- Agara Culvert, Ogbere Pegba - Egbada Tuba road - Pegba (Ogbere river) Bridge and saasa River Culvert, Apete Road-Osajin; 2). ESMPs for 13 priority sites: (Elere, Olorungunwa, Foworogi, Maje, Omirin, Ebenezero, Alaro 7Up, Abonde, Oki Oke Ayo, Isokun, Alaro Poly, Believer's stream, Ogbere Moradeyo); 3). Eleyele Dam (ESMP for Ogee Scour Palliative Work, and ESIA for Eleyele dam rehabilitation) 4). ESMPs for Ibadan City-wide Dredging for 2018, 2019, 2020 and 2021; 5). PLTL1: ESIA and ESMPs for project sites under Lot 1 (Kudeti, Ogbere North, Agodi, Orogun River channelization and associated structures) and Lot 2 (Ogbere South channelization and critical structures at NISER Ojoo 6T, Apete, Jerusalem Ojoo-Arulogun, Molade and Odogbo Fatokun) and 6). ESIA under preparation for PLTL2: (i) Channelization and Construction/ Rehabilitation of Hydraulic Structures on Ona River and (ii) Construction of Attenuation Dikes Around Upper and Middle Catchment of Ona River. The Borrower has also prepared SESAs for Ibadan City Master Plan and Ibadan Flood Risk and Drainage Master Plan.

The implementation of measures stipulated in the ESIA/ESMPs and field monitoring of safeguards mitigation measures for subprojects has seen moderately satisfactory progress till date. To improve the management of potential risks and impacts, for environmental, social, health & safety management, the PIU has engaged a Third-Party Monitor to conduct independent site inspections and prepare periodic reports based onsite inspection of civil work activities and conducts safeguards trainings to Contractors, Consultants and relevant MDAs responsible for mitigation and monitoring of safeguards requirements. Routine compliance monitoring of mitigation measures with effective reporting mechanisms of the Contractors, Supervising Consultants and PIU safeguards team is essential.

Most of the sub-projects in the IUFMP are not expected to result in major losses or acquisition of land or in restrictions to sources of livelihoods. However, given the possibility that some of the sub-projects may involve land acquisition and involuntary resettlement, an RPF has also been prepared.

(b) Involuntary Resettlement (OP/BP 4.12): Civil works activities under component 2 which include the rehabilitation and reconstruction of vital physical infrastructure assets such as damaged roads, bridges, storm water networks, public water supply, drainage systems and river banks/embankments will result in social risks and impacts on people, land and other economic resources and livelihoods. As part of the safeguards due diligence, an RPF was prepared. The RPF outlines the resettlement process in terms of procedures for preparing and approving Resettlement Action Plans (RAPs); likely categories of affected people, eligibility criteria and categories, compensations rates, methods of valuing affected assets, community participation and information dissemination, Grievance Redress Mechanism and effective monitoring. RAPs have been prepared under the improvement of critical infrastructure, such as river channels, culverts, and bridges at 17 priority sites and Lot 1 and Lot 2 of First Pool of Long-Term Investment (PLT1) and the Second Pool of Long-Term Investment (PLT2). Under physical displacement/relocation, 1011 PAPs have been relocated/compensated, while 2,038 PAPs have been compensated under economic displacement in RAPs under the 17 Priority sites and 1<sup>st</sup> and 2<sup>nd</sup> Pool of LTI which have been fully implemented and Ona Channelization under the 2<sup>nd</sup> Pool of LTI which is undergoing implementation.



(c) Natural Habitats (OP/PB 4.04) is triggered because some project activities may take place near to critical natural habitats or environmentally sensitive areas. The rehabilitation and operation of dam and drainage systems could affect downstream rivers, floodplains, wetlands and other fragile ecological systems thereby triggering OP4.04. The project will also include interventions in upstream catchments. The ESMF and subsequent sub-project ESIA/ESMPs contains sections detailing the mitigation measures for eliminating or minimizing potential sub-project activities impacts on the natural habitat of the catchment area of the project. The project is not being implemented in any area with critical natural habitats, nor does it involve the significant conversion or degradation of natural habitats. The Borrower has prepared ESIA/ESMPs to address concerns relating to natural habitat including robust sub project screening on proposed interventions to meet requirements of OP 4.04

(d) Physical Cultural Resources (OP/BP 4.11) is triggered because some activities in Components 2 may include civil works that could expose chance finds. These chance find sites may include sacred shrines and burial sites. The Borrower has used the environmental and Social Screening Checklist and the Generic Environmental and Social Mitigation Measures Checklist that are annexed to the ESMF to address the Physical Cultural Resource (PCR), and the ESMF includes provisions for addressing such cultural heritage chance finds. The Borrower has prepared ESIA/ESMPs to address concerns relating to Physical Cultural Resources including robust sub project screening on proposed interventions to meet requirements of OP 4.11

(e) Safety of Dams (OP/BP 4.37): The IUFMP will not be directly involved in the construction of new dams. However, component 2 may include rehabilitation of damaged spillway and stilling basin to improve dam safety. The ESMF and RPF included checklists which have been used to effectively screen out sub-projects for their potential environmental and social impacts. In addition, A Dam Safety Report (DSR) and Environmental and Social compliance audit of the associated facilities have been prepared by the Borrower and implemented as required.

The State Government has hired both an environmental and a social specialist (seconded where appropriate), whose capacity have been further bolstered through the recruitment of a social specialist technical assistant and an environmental specialist technical assistant under progress. The project was designed to not only to support flood risk management infrastructure, but progress has been noted towards building institutional capacities to manage flood risk and prepare against future natural rainfall disasters. The institutions actions ensure sustainability and ownership of project activities after the end of the project.

A number of ESHS capacity strengthening initiatives have been implemented for PIU staff, contractors and consultants. These include workshops, training programs and the development of templates for use by E&S staff at all work sites. These capacity strengthening measures, workshops and training on enforcement of E&S mitigation measures, monitoring and reporting will be deepened under the restructuring. To strengthen the ESHS capacity of relevant implementing entities, measures to enhance E&S compliance monitoring of work sites with the environmental regulations; social and environmental safeguards and environmental and social assessment provisions and overall monitoring and oversight of social and environmental issues at project levels is required due to the geographically dispersed nature of civil work activities in Ibadan city.

The institutional arrangements for Project implementation will remain unchanged from the original design. The State Government has strengthened the oversight of the project through a functioning Project Steering Committee and ensuring regular meetings of PSC leading to coordinated and continuous inputs of the MDAs participating in the project. There is commitment of regular meeting of the PSC to review project progress, monitor attainment to all agreed actions and supervise the performance of the PIU, Contractors and Consultants.



5. Identify the key stakeholders and describe the mechanism for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

The key stakeholders are the Oyo state ministries of Environment and Habitat; Water Resources; Urban Development and Physical Planning; Works; Emergency management Agency; the 11 LGAs; local communities, NGOs and other relevant institutions and the Project Affected Persons.

All the relevant stakeholders have been adequately informed of the project and and further consulted during the preparation of the ESMF, RPF, ESIA's and all site specific instrument such as ESMPs and RAPs. The key concern raised during the consultation include Land degradation & land use; Water pollution and drainage systems; Solid waste management; Waste Water Management; Floods; man induced issues; Labour and socio-economic issues; Public Health (Especially HIV/AIDs; Water-borne diseases & Cholerias; STIs; Malaria; etc).

Public consultation will be an on-going activity taking place throughout the entire project process. Public participation and consultation would take place through meetings, radio programs, requests for written proposals/comments, filling in of questionnaires, explanations of project to the locals, making public documents available at the state and local levels. At the local level, suitable locations will include the residents at the flood risk areas. These measures would take into account the low literacy levels prevalent in these rural communities by allowing enough time for responses and feedback.

**B. DISCLOSURE REQUIREMENTS**

**Environmental Assessment/Audit/Management Plan/Other**

Date of receipt by the Bank	Date of submission for disclosure
29-Jan-2014	29-Jan-2014

For Category 'A' projects, date of distributing the Executive Summary of the EA to the Executive Directors
22-May-2014

"In country" Disclosure	
Country	Date of Disclosure
Nigeria	22-Jan-2014

Comments

**Resettlement Action Plan/Framework Policy Process**

Date of receipt by the Bank	Date of submission for disclosure
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29-Jan-2014	29-Jan-2014
"In country" Disclosure	
Country	Date of Disclosure
Nigeria	22-Jan-2014
Comments	

### C. COMPLIANCE MONITORING INDICATORS AT THE CORPORATE LEVEL

#### OP/BP/GP 4.01 - Environment Assessment

Does the project require a stand-alone EA (including EMP) report?	Yes
If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?	Yes
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes

#### OP/BP 4.04 - Natural Habitats

#### OP/BP 4.11 - Physical Cultural Resources

Does the EA include adequate measures related to cultural property?	Yes
Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?	Yes

#### OP/BP 4.12 - Involuntary Resettlement

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?	Yes
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	Yes
Is physical displacement/relocation expected? 1011 PAPs in RAPs under the 17 Priority sites and 1 <sup>st</sup> Pool of LTI which have been fully implemented while the RAPs under the 2 <sup>nd</sup> Pool of LTI are undergoing implementation	Yes
Is economic displacement expected? (loss of assets or access to assets that leads to loss of income sources or other means of livelihoods) 2038 PAPs under	Yes



the 17 Priority sites, 1 <sup>st</sup> Pool of LTI which have been fully implemented and RAPs under the 2 <sup>nd</sup> pool of LTI which are undergoing implementation	
<b>OP/BP 4.37 - Safety of Dams</b>	
Have dam safety plans been prepared?	Yes
Have the TORs as well as composition for the independent Panel of Experts (POE) been reviewed and approved by the Bank?	NA
Has an Emergency Preparedness Plan (EPP) been prepared and arrangements been made for public awareness and training?	Yes
<b>The World Bank Policy on Disclosure of Information</b>	
Have relevant safeguard policies documents been sent to the World Bank for disclosure?	Yes
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	Yes
<b>All Safeguard Policies</b>	
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes
Have costs related to safeguard policy measures been included in the project cost?	Yes
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes
<b>III. APPROVALS</b>	
Task Team Leader(s)	Francis Samson Nkoka Robert Curle Jesse Reid



Approved By		
Safeguards Advisor		
Practice Manager/Manager		

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**Note to Task Teams:** End of system generated content