



RAP

**RESETTLEMENT ACTION PLAN
for the proposed**

ATC

**AGRICULTURAL TRANSFORMATION
CENTRE**

AT OKUKU, YALA LGA, CROSS RIVER STATE

BY



CR-SAPZ

**CROSS RIVER-SPECIAL AGRO-INDUSTRIAL PROCESSING ZONE
PROGRAM**

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RESETTLEMENT ACTION PLAN (RAP)

FOR THE PROPOSED

**AGRICULTURAL TRANSFORMATION CENTRE (ATC)
AT OKUKU, YALA LGA, CROSS RIVER STATE**

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TABLE OF CONTENTS

TABLE OF CONTENTS	3
LIST OF TABLES	7
LIST OF FIGURES	8
LIST OF PLATES	9
ABBREVIATIONS & ACRONYMS	10
RAP DATA SHEET.....	13
1 INTRODUCTION.....	22
BACKGROUND TO THE STUDY.....	22
PROPOSED PROJECT LOCATION.....	23
PROPONENT'S INTENT & RAP OBJECTIVE.....	24
ATC LAYOUT	25
COMPONENTS OF THE AGRICULTURAL TRANSFORMATION CENTRE (ATC) AT OKUKU.....	25
ON-SITE INFRASTRUCTURE AND FACILITIES PLANNING	25
THE NEED FOR THE PROJECT	29
BENEFITS OF THE PROJECT.....	30
<i>Socioeconomic Benefits of the Project</i>	30
<i>Benefits for the Government.....</i>	31
<i>Benefits for the Community</i>	31
<i>Benefits for the Investors</i>	32
<i>Revenue Drivers</i>	32
VALUE OF THE PROJECT.....	33
ENVISAGED SUSTAINABILITY	35
<i>Social Desirability.....</i>	35
<i>Economic Viability</i>	36
DEVELOPMENT OPTIONS.....	36
<i>No Project Option</i>	36
<i>Delayed Project Option</i>	36
<i>Immediate Project Implementation</i>	36
PROJECT SITE ALTERNATIVES	37
2 LEGAL AND ADMINISTRATIVE FRAMEWORK.....	67
2.1 CROSS RIVER STATE	67
FEDERAL MINISTRY ENVIRONMENT	67
NATIONAL REGULATORY FRAMEWORK.....	68
CONVENTIONS, PROTOCOLS AND AGREEMENTS	69
INTERNATIONAL BEST PRACTICE STANDARDS AND GUIDELINES AFRICAN DEVELOPMENT BANK'S INTEGRATED SAFEGUARDS SYSTEM	70
BENCHMARKING OF RELEVANT NIGERIAN LEGISLATION AND THE AFDB'S OS 5.....	75
3 THE EXISTING SOCIOECONOMIC ENVIRONMENT	81
SOCIAL AREA OF INFLUENCE (SAI)	81
OBJECTIVES OF THE SOCIOECONOMIC BASELINE DATA ACQUISITION	81
SCOPE OF THE SIA	81
<i>Methodology.....</i>	82
<i>Sampling Method.....</i>	82
BACKGROUND OF THE STUDY AREA - YALA LGA.....	84
<i>Historical and Geographical Background</i>	84
<i>Political and Governance Structures</i>	84
<i>History, Governance and Administrative Structures</i>	84

<i>Social Organizations and Support Systems</i>	85
<i>Cultural Groups and Cultural Festivals Ipuole Okuku village</i>	86
<i>Ethnic Composition of the Study Area</i>	87
<i>Cultural Heritage</i>	87
<i>Language and Communication</i>	87
<i>Gender Issues</i>	87
<i>Taboos/Norms</i>	88
<i>Dispute Resolution</i>	88
<i>Marriage and Family</i>	88
<i>Sexual Orientation</i>	89
<i>Potential Project Impacts on LGBTQs</i>	89
RELIGIOUS PRACTICES AND BELIEF SYSTEMS	90
<i>Archaeological Heritage and Resources</i>	90
<i>Social vices</i>	91
DEMOGRAPHIC CHARACTERISTICS OF THE STUDY AREA	91
<i>Dependency Ratio</i>	96
<i>Implications of the high dependency Ratio High youth dependency:</i>	97
<i>Marital Status</i>	98
<i>Household Composition, Structure and Size</i>	99
<i>Educational Characteristics of the Study Community</i>	99
OCCUPATIONAL DISTRIBUTION OF RESPONDENTS	100
<i>Income Distribution</i>	100
<i>Household Expenditure Pattern</i>	101
<i>Religious Affiliation</i>	101
<i>Availability of Basic Facilities and Amenities</i>	102
<i>Availability of Educational Facilities</i>	103
<i>Sources of Power Supply for Lighting</i>	103
<i>Available Sources of Energy</i>	103
<i>Available Means of Commercial Transportation</i>	104
<i>Transportation cost</i>	104
<i>Housing Ownership</i>	104
<i>Building Materials Used in Housing Construction</i>	104
<i>Cost of House Rent in the Project Community</i>	105
<i>Community Needs and Priority Ranking of the Needs by the Community (with 1 as the highest and 6 as the lowest priority)</i>	106
<i>Socio - Economic and Livelihood Activities of the Project Affected Communities</i>	106
<i>Crop Farming</i>	106
<i>Challenges to Crop Farming in the area</i>	106
<i>Land Ownership and Tenure</i>	108
<i>Employment Situation in Households</i>	108
<i>Available Infrastructure and Their Functional Status</i>	108
<i>Impact History</i>	112
<i>Problems Confronting the Community</i>	112
<i>Socio-Economic Sensitivities and Vulnerable Groups</i>	113
<i>Vulnerable Groups</i>	113
4 IMPACTS ON LIVELIHOODS	115
4.1 DESCRIPTION OF PERMANENT AND TEMPORARY IMPACTS	115
PERMANENT IMPACTS	115
TEMPORARY IMPACTS	115
LIVELIHOOD CATEGORIES AFFECTED	116
4.2 CULTIVATED AREAS	117
5 LIVELIHOOD RESTORATION STRATEGIES	120

TRAINING, RE-SKILLING, AND VOCATIONAL PROGRAMS.....	120
AGRICULTURAL SUPPORT (INPUTS, TOOLS, EXTENSION SERVICES)	120
SUPPORT FOR MICRO-ENTERPRISES AND SMEs	121
ACCESS TO FINANCIAL SERVICES AND BUSINESS ADVISORY	121
JOB PLACEMENT, INTERNSHIPS, AND LOCAL EMPLOYMENT LINKS	122
SPECIAL PROGRAMS FOR WOMEN, YOUTH, AND VULNERABLE PAPs.....	123
6 ELIGIBILITY, ENTITLEMENTS & COMPENSATION FRAMEWORK.....	124
6.1 ELIGIBILITY CRITERIA FOR INCLUSION IN LIVELIHOOD PROGRAMS.....	124
6.2 LIVELIHOOD ENTITLEMENT MATRIX (LINKED TO RAP)	124
6.3 PROCEDURES FOR ENROLMENT AND TRACKING	125
6.4 COMPENSATION FRAMEWORK	125
6.7 ENTITLEMENTS	126
<i>Entitlement Planning</i>	132
<i>Method of Compensation</i>	132
<i>Entitlement for Compensation</i>	132
6.8 PAPs ENUMERATION & VALUATION METHODOLOGY	132
<i>GIS Technology used during the F of PAPs</i>	132
<i>ICT Approach to Data Collection</i>	133
6.10 DATA COLLECTION PROCEDURE.....	134
<i>Enumerator Training</i>	134
<i>Fieldwork</i>	134
<i>Supervision and Monitoring</i>	134
6.10.1 DATA QUALITY ASSURANCE.....	134
6.10.2 DATA ANALYSIS	134
<i>Advantages of Using KoboToolbox</i>	135
<i>Ethical Considerations</i>	135
6.11 METHOD OF VALUATION	135
7 STAKEHOLDER ENGAGEMENT AND PARTICIPATION	136
SUMMARY OF STAKEHOLDER CONSULTATIONS.....	137
ROLE OF TRADITIONAL LEADERS, CSOs, AND CBOs.....	138
<i>Stakeholder Consultations and Integration in the Study</i>	138
<i>Stakeholder Perceptions, Concerns and Expectations</i>	142
PLAN FOR CONTINUED ENGAGEMENT	145
8 BUDGET AND FINANCING	146
8.1 FUNDING SOURCES AND DISBURSEMENT ARRANGEMENTS.....	146
8.2 INSTITUTIONAL FRAMEWORKS.....	147
RAP IMPLEMENTATION SCHEDULE	150
9 MONITORING, REVIEW AND EVALUATION	151
9.1 MONITORING FRAMEWORK.....	151
9.2 INTERNAL PERFORMANCE MONITORING	153
IMPACT MONITORING	153
9.3 INDICATORS	154
<i>Input Indicators</i>	154
<i>Output Indicators</i>	154
<i>Process Indicators</i>	154
<i>Outcome Indicators</i>	154
<i>Impact Indicators</i>	154
<i>9.4 Internal Monitoring</i>	155
<i>Objectives of Internal Monitoring & Evaluation</i>	155
EXTERNAL MONITORING AND EVALUATION.....	155

RAP COMPLETION AUDIT.....	156
REPORTING	157
REFERENCES	158
APPENDICES.....	159
HTTPS://DL.UBUOFFICE.COM/WL/?ID=NRX74AN6UTNUIK61U4KAKKUAQDSBK2YY	159
APPENDIX 2:PAPS' INDIVIDUAL AGREEMENT FORMS	159

LIST OF TABLES

Table 1: ATC Site provisions	26
Table 2: Facilities and components in the proposed ATC	27
Table 3: ATC component capacity and lifespan details	28
Table 4: Facility Design Details	28
Table 5: Crop value chain constraints in Cross River State.....	30
Table 6: Revenue Sources	32
Table 7: Potential Cassava Value Chain.....	33
Table 8: Potential Cocoa & Rice Value Chains.....	34
Table 9: MCA for site selection.....	38
Table 10: National policies and regulations and the application	68
Table 11: List of Relevant International Conventions and Regulations	69
Table 12: AfDB's Operational Safeguards.....	70
Table 13: Benchmarking of Nigerian Law and Principles of the AfDB on Involuntary Displacement.....	77
Table 14; Projected Populations of Yala LGA, 2025 - 2028.....	92
Table 15: Projected Demographics for Yala LGA and Ipuole Okuku Village (2025).....	93
Table 16: Age Distribution projections for Ipuole Okuku Village for 2025.....	94
Table 17: 2025 Projected Dependency Ratio for Yala LGA and Ipuole Okuku Village	96
Table 18: Household Sizes in the Project Community	99
Table 19: Household Expenditure Pattern	101
Table 20: Available Drinking Water Sources and Usage by Households.....	102
Table 21: Availability of Educational Facilities	103
Table 22: Showing Available Sources of Energy for Cooking	104
Table 23: Housing Ownership Status of Residents.....	104
Table 24: Building Materials Used in the Project Communities	104
Table 25: Showing Building Materials Used for Walls & Roof.....	105
Table 26: Showing the Current Cost of Rent for Different Types of Houses	105
Table 27: Showing the Priority Needs Ranking by the Community.....	106
Table 28: Socio-Economic Sensitivities	113
Table 29: Summary of Anticipated Permanent and Temporary Impacts in the Project Area	116
Table 30: Summary of Affected Livelihood Categories and Nature of Impacts.....	116
Table 31: Pre-settlement Estimated revenue from farming	117
Table 32: post-settlement estimated revenue from farming.....	123
Table 33: Livelihood entitlement matrix	124
Table 34: Eligibility Criteria for Compensation	126
Table 35: Categories of PAPs and compensation according to Nigeria guideline and AfDB requirements	128
Table 36: Entitlement Matrix.....	130
Table 37: Participants and Discussions at the Stakeholders' Engagements.....	140
Table 38: LRP Implementation Budget Breakdown.....	147
Table 39: RAP Monitoring Framework.....	152

LIST OF FIGURES

Figure 1: Location Map of the Cross River State Special Agro-Industrial Processing Zone (SAPZ) in Okuku, Yala LGA.....	23
Figure 2: Satellite Imagery Showing Landmarks Around the Project Site in Okuku, Yala LGA.	24
Figure 3: Proposed ATC Layout.....	26
Figure 4: The ATC site showing the existing trees to be conserved (in green)	27
Figure 5: Site Suitability Map for the proposed ATC Using GIS and MCA Techniques.....	38
Figure 6: Flow chart of the work scope	39
Figure 7: Proposed Project Execution Schedule	41
Figure 8: Projected Demographics for Yala LGA and Ipuole Okuku Village (2025)	93
Figure 9: Population Pyramid for Yala LGA (2025 projection)	94
Figure 10: Projected age group distribution for 2025 in Ipuole Okuku village. Source: PGM's Projection (2025)	95
Figure 11: Population Pyramid of Ipuole Okuku Village (Based on 2025 population projection).....	95
Figure 12: Sex Distribution of Respondents in the Study Community	97
Figure 13: Age Distribution of Respondents in the Study Community	98
Figure 14: Marital Status of Respondents in the Project Community Source.....	98
Figure 15: Educational Distribution of Respondents Source	100
Figure 16: Occupational Distribution of Respondents.....	100
Figure 17: Average Monthly Income of Respondents	101
Figure 18: Religious Affiliation of Respondents Source	102
Figure 19: Enumerated farmlands / economic trees	119
Figure 20: Screenshot of Avenza App used in the field during PAPs' enumeration exercise	133
Figure 21: RAP/LRP Implementation Schedule.....	150

LIST OF PLATES

Plate 1: Showing Different Church Denominations in Ipuole Village.....	90
Plate 3.2: Public tap (hand pump) for Water Supply In Ipuole Okuku village	103
Plate 3: Showing Building Materials Used for Walls & Roof.....	105
Plate 4: Dirt Road in Ipuole Okuku	109
Plate 5: Ipuole Okuku Town Hall (left) Plate 6: Primary Health Care Centre at Ipuole Okuku (middle & right)	110
Plate 7: Different educational facilities (St. Mathias Offoboche Secondary School, Holy Child Convent Primary School, St. Joseph's Primary School) in the host community	110
Plate 8: University of Cross River State, Okuku Campus (1 st & 2 nd - left) Plate 9: Sources of water supply in Ipuole Okuku (3 rd & 4 th - right)	111
Plate 10: Electric Power Infrastructure in Ipuole Okuku village (left) Plate 11: Okuku Market (middle & right)	111
Plate 12: Abandoned projects in Ipuole Okuku (proposed beverages factory (carbonated and soda drinks (left); proposed Roofing Sheets Factory (middle); and proposed site for stadium (right)	112
Plate 13: Individual Georeferenced Existing Tree and Shrubs in the Project Area (PGM fieldwork, 2025)	118
Plate 14: Consultation meeting on 27.06.2025 at Sanctus Hotel, Okuku with Ipuole Okuku community elders, youth and women leaders (left); FGD with community elders, youth and women leaders (Middle left); FGD with community women (Middle right); and Key Informant.....	144
Plate 15: Cross sections of participants at stakeholders engagement / scoping workshops (top left), the FMEEnv. Rep making addressing the workshop, surrounded by the Clan Head of Okuku, the Chairman of Yala LGA and a rep of Clan Head of Adiabo (top middle), and top right, reps of the Nigerian Navy, NSCDC, Customs, among other participants	144
Plate 16: Consultation Meeting with the Chairman, Yala LGA, Councilors, Ipuole Okuku	144

ABBREVIATIONS & ACRONYMS

Acronym	Full Meaning
%	Percent
<	Less than
>	Greater than
≤	Lesser than or equal to
≥	Greater than or equal to
≥	Greater than or equal to
°C	Degree Celsius
°F	Fahrenheit
AfDB	African Development Bank
AIH	Agro-Industrial Hub
AQ	Air Quality
CE	Critically Endangered
Cl ₂	Chlorine gas
CO	Carbon monoxide
CBO	Community-Based Organization
CRS	Cross River State
CRMAI	Cross River State Ministry of Agriculture & Irrigation
CRMEnv	Cross River State Ministry of Environment
CRS-SAPZ	Cross River -Special Agro-industrial Processing Zone Program
CSO	Civil Society Organization
DD	Data Deficient
dB(A)	Decibel
E	East
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EN	Endangered
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
FBO	Farmer-Based Organization
FGD	Focus Group Discussion
FMAFS	Federal Ministry of Agriculture and Food Security
FMEnv	Federal Ministry of Environment
FMoHSW	Federal Ministry of Health and Social Welfare
GBV	Gender-Based Violence
GI	Galvanized Iron
GPS	Geographic positioning unit
GRM	Grievance Redress Mechanism
H ₂ S	Hydrogen sulphide
HCN	Hydrogen Cyanide
HDPE	High-Density Polyethylene

Acronym	Full Meaning
IFAD	International Fund for Agricultural Development
IPP	Indigenous Peoples Plan
ISDB	Islamic Development Bank
IUCN	International Union for Conservation of Nature
KII	Key Informant Interview
KLD	Kilolitre per Day
KVA	Kilo Volt Ampere
LC	Least concern
LGA	Local Government Area
LGBTQ	Lesbian, Gay, Bisexual, Transgender, and Queer
LREP	Livelihood Restoration and Enhancement Plan
M	Meter
m/s	meters per second
m ³	Meter Cube
mg/m ³	Milligram per cubic meter
Max	Maximum
M&E	Monitoring and Evaluation
MBBR	Moving Bed Biofilm Reactor
Min	Minimum
MVA	Mega Volt Ampere
N	North
NE	North East
NGO	Non-Governmental Organization
NH ₃	Ammonia
NIOSH	National Institute of Occupational Safety and Health
NIMET	Nigerian Meteorological Agency
NO ₂	Nitrogen dioxide
NPC	National Population Commission
NT	Near Threatened
NW	North-West
PAPs	Project-Affected Persons
PEL	Permissible Exposure Limit
PM	Particulate matter
ppm	Part per million
PPP	Public-Private Partnership
RAP	Resettlement Action Plan
REA	Rural Electrification Agency
RCC	Reinforced Cement Concrete
Rmt	Running Meter
S	South

Acronym	Full Meaning
SE	South East
SAPZ	Special Agro-Industrial Processing Zones
SEA	Sexual Exploitation and Abuse
SGBV	Sexual and Gender-Based Violence
SIA	Social Impact Assessment
SMEs	Small and Medium Enterprises
SO ₂	Sulphur dioxide
STEL	Short-term Exposure Limit
STP	Sewage Treatment Plant
SW	South West
Th	Threatened
ToR	Terms of Reference
TVOCs	Total Volatile Organic Compounds
TWA	Time Weighted Average
VCD	Value Chain Development
VGP	Vulnerable Groups Plan
Vu	Vulnerable
W	West
WHO	World Health Organization
Zn	Zinc

RAP DATA SHEET

#	Variables	Data
A. General		
1	State	1
2	LGA	1
3	Communities	1
4	Activity(ies) that trigger resettlement	None. Land-Take-over
5	Project overall cost	
6	Overall resettlement cost	USD 45100
7	Applied cut-off date (s)	17 th June, 2025
8	Dates of consultation with the people affected by the project (PAP)	16 th -19 th June, 2025
9	Dates of the negotiations of the compensation rates prices	July 2025
B. Specific information		
10	Number of people affected by the project (PAP)	340
11	Number of Physically displaced	0
12	Number of economically displaced	340
13	Number of affected households	68
14	Number of females affected	0
15	Number of vulnerable affected	0
16	Number of major PAP	68
17	Number of minor PAP	0
18	Number of total right-owners and beneficiaries	0
19	Number of households losing their shelters	0
20	Total area of lost arable/productive lands (ha)	24
21	Number of households losing their crops and/or revenues	68
22	Total areas of farmlands lost (ha)	37.8
23	Estimation of agricultural revenue lost (USD)	USD 47,000 USD
24	Number of buildings to be demolished totally	0
25	Number of buildings to demolish totally at 50%	0

#	Variables	Data
26	Number of buildings to demolish totally at 25%	0
27	Number of tree-crops lost	62
28	Number of commercial kiosks to demolish	0
29	Number of ambulant/street Sailors affected	0
30	Number of community-level service infrastructures disrupted or dismantled	0
31	Number of households whose livelihood restoration is at risk	68

****USD 1 = NGN1550**

EXECUTIVE SUMMARY

ES 1: Introduction

The proposed Agricultural Transformation Centre (ATC) at Okuku, Yala LGA, Cross River State, is part of Nigeria's Special Agro-Industrial Processing Zones (SAPZs) program, led by the Federal Ministry of Agriculture and Food Security (FMAFS) in collaboration with state governments, AfDB, IsDB, IFAD, and private investors. The program seeks to diversify Nigeria's economy, boost agricultural productivity, reduce post-harvest losses, and promote value addition through agro-industrial clusters.

The Okuku ATC will cover 37.8 hectares, strategically located along the Ogoja–Yala highway, close to major institutions such as Bakor Polytechnic and the University of Cross River State. The project will host 11 agro-industries of different scales, in addition to the existing rice mill on an adjacent property, supported by shared infrastructure such as roads, power, water, drainage, warehouses, processing centres, cold storage, a vocational centre, health facilities, markets, and green areas. The project also incorporates sustainability by conserving 6.5 hectares of natural vegetation and integrating social and environmental safeguards.

The 37.8 ha land proposed for the ATC is part of the land previously acquired by the Government of Cross River State and reserved for industrial purposes. It has been fallow farmers took advantage of that to cultivate their crops. This Resettlement Action Plan (RAP) has been prepared to address the social and economic impacts of land repossession, ensuring fair compensation and livelihood restoration for affected farmers and households who use portions of the land solely for farming.

The ATC will stimulate value chains in cassava, rice, and cocoa, generating opportunities for farmers, processors, and traders. Benefits will accrue at multiple levels: for the government, improved revenue and investor confidence; for communities, better infrastructure, training, market access, and employment; and for investors, shared world-class infrastructure, tax waivers, and reduced costs of operation. Sustainability will be ensured through stakeholder engagement, livelihood restoration programs, CSR initiatives, and preference for local labour.

Alternative development options were considered. The “no project” option was rejected due to worsening food insecurity and missed economic opportunities; the “delayed project” option was also rejected as unsustainable and costly. The immediate implementation at Okuku was chosen as the most viable path. Using GIS and Multi-Criteria Analysis (MCA), Okuku was identified as the most suitable site compared to alternatives, due to its connectivity, security, and favorable land use.

ES 2: Project Description

The proposed ATC Agricultural Transformation Centre (ATC) infrastructure will include office buildings, training centres, general services fencing, internal access roads/parking, drainage, power supply, water, and sewerage, effluent management, health, and safety specialized services will include quarantine, quality control, lab. and certification centres. breeding centres, business support services (administrative) knowledge/ ICT/procurement /employment centres, and activities to implement the ESMP.

The proposed project site in Okuku, Yala LGA is located at latitude 6°41'5.05"N; longitude 8°47'0.45"E along Ogoja-Yala highway in Okuku, Yala local government area of Cross River State and it covers 37.837 hectares of land owned by the Government of Cross River State but is used by the indigenes for cultivation of rice, yam, maize, groundnut and other crops, etc. The project site is located 350m north of Ogoja Rice Mill. Eastward, the proposed project site is located opposite Godwin Ali Cantonment and Army Barracks which are 700m and 1061m away from the site respectively.

ES 3: Scope of Land Acquisition and Resettlement Impacts

The impacts fall mainly under loss of productive land and farming-based income. Vulnerable groups such as women farmers, elderly heads of households, and youth dependent on casual farm work are at particular risk of hardship. The loss of farmland may exacerbate poverty, reduce food security, and push households towards unsustainable coping mechanisms.

Despite these challenges, the project also presents opportunities. The ATC promises new employment during construction and operations, expanded markets for produce, and long-term livelihood diversification. However, these benefits will only be realized if appropriate safeguards are in place.

To mitigate risks, the RAP calls for fair compensation at replacement value, livelihood restoration programs, and targeted support for vulnerable groups. Without these measures, economic displacement could deepen poverty and undermine community trust in the project

ES 4: Socio-Economic Baseline of PAPs

The third chapter provides the socioeconomic baseline of Okuku and the surrounding Yala Local Government Area, forming the foundation for understanding the impacts of the ATC project. The population is predominantly rural, with households largely dependent on subsistence and smallholder farming of crops such as rice, cassava, yam, maize, and groundnut. Farming is the main source of income, though yields remain low due to limited access to improved seeds, fertilizers, modern equipment, and extension services.

Demographic data show a young population structure, high dependency ratios, and moderate literacy levels, with education and health facilities present but often under-resourced. Infrastructure is limited: many households rely on boreholes, streams, or public taps for water; cooking is mainly done with firewood; and road networks are underdeveloped. Housing ranges from mud structures to cement-block houses, with varying access to electricity and sanitation.

Community consultations revealed that priority needs include better road access, electricity, potable water, modern farming inputs, and employment opportunities. Social cohesion remains strong, with traditional leadership structures, churches, and community organizations playing central roles in governance and welfare. However, poverty and vulnerability are widespread, especially among women, youth, and elderly farmers.

This baseline highlights both the dependence on agriculture and the risks posed by land acquisition. Without appropriate safeguards, households stand to lose vital income sources. At the same time, the socioeconomic profile shows significant opportunities for the ATC to improve livelihoods by creating jobs, opening markets, and strengthening value chains

key trigger for impacts in the proposed ATC project is the take-over of 37.8 hectares of land, currently used by community members for farming. While no physical displacement of households or demolition of houses will occur, the project will result in economic displacement affecting 340 people across 68 households. These households stand to lose farmlands, crops, and income, with an estimated agricultural revenue loss of about USD 45,100. In addition, 62 economic trees and several community-level facilities will be disrupted.

There are no significant vulnerable groups among the PAPs apart from the elderly, who are only 4 in number and are not disadvantaged.

ES 5: Legal, Institutional, and Policy Framework

The legal and administrative framework guiding the Okuku ATC RAP, ensuring compliance with Nigerian laws and international safeguard policies has been considered. At the national level, the Land Use Act (1978, revised 2004) gives state governors authority over land allocation, while the Environmental Impact Assessment Act (2004) makes environmental and social assessments mandatory for major projects. The National Gender Policy (2021) promotes inclusivity and protection against gender-based violence, and the Agricultural Promotion Policy (2016) supports sustainable value chain development and climate-smart agriculture.

Nigeria's international commitments also apply. The Rio Declaration on Environment and Development (1992) emphasizes integrating environmental protection into development, while other treaties reinforce sustainable use of resources and protection of cultural heritage.

The RAP also aligns with the African Development Bank's Integrated Safeguards System (2023). Relevant standards include OS1 (environmental and social risk management), OS2 (labour conditions), OS5 (land acquisition and resettlement), OS8 (cultural heritage protection), and OS10 (stakeholder engagement and disclosure). A key distinction is that Nigerian law focuses mainly on asset compensation, whereas AfDB requirements go further by demanding livelihood restoration and improvement. The RAP therefore adopts a blended approach that respects national law while meeting AfDB standards.

Institutionally, implementation responsibilities lie with the Federal Ministry of Environment (FMEnv), the Cross River State Ministry of Environment, and the CR-SAPZ Project Implementation Unit, working together with local governments and community stakeholders. This framework ensures that resettlement and compensation are carried out transparently, equitably, and in line with best practice.

ES 6: Livelihood Restoration Measures

The fifth chapter presents the Livelihood Restoration Plan (LRP), which outlines how affected households will recover from the economic displacement caused by the ATC project. The plan is built on the principle that compensation alone is insufficient; households must also be supported to restore and, where possible, improve their living standards and income levels.

The strategy combines agricultural support, vocational training, and enterprise development. Farmers will receive improved inputs, tools, and extension services to boost productivity on remaining farmlands. Youths and women will be offered training in alternative skills and trades, enabling them to diversify into non-farm businesses such as processing, marketing, and

services. Micro, small, and medium enterprises (SMEs) will be encouraged through entrepreneurship training and access to start-up support.

Access to financial services is also central to the plan. Households will benefit from micro-credit schemes, cooperative strengthening, and business advisory services to improve financial resilience. Employment linkages will be established to connect local residents to job opportunities within the ATC during both construction and operation phases. Special attention is given to vulnerable groups, including women-headed households, elderly farmers, and at-risk youth, to ensure equitable participation.

Overall, the LRP transforms resettlement from a risk into an opportunity by equipping PAPs with the tools, knowledge, and networks to build more sustainable livelihoods beyond subsistence farming.

The sixth chapter defines the eligibility criteria and entitlements for Project Affected Persons (PAPs), ensuring that all those impacted by the Okuku ATC project are fairly identified and adequately supported. Eligibility is determined by the cut-off date of 17th June 2025, after which no new claims will be considered. Those eligible include individuals and households who occupied or made use of the project site before this date, particularly farmers, crop and tree owners, and users of communal resources.

The entitlements are guided by both Nigerian legislation and AfDB safeguards, and are summarized in a Livelihood Entitlement Matrix. Compensation covers loss of land, crops, and economic trees, with payments calculated at full replacement value. Beyond monetary compensation, PAPs will also benefit from livelihood restoration programs, including access to improved farm inputs, vocational training, micro-credit facilities, and entrepreneurship support.

A special focus is placed on vulnerable groups, such as women-headed households, the elderly, and economically at-risk individuals. These groups will receive tailored assistance to ensure they are not left worse off by the project. Transparency and equity are emphasized, with PAPs directly involved in verifying entitlements and monitoring the compensation process.

By combining compensation with long-term livelihood support, this framework ensures that affected persons are not only reimbursed for their immediate losses but also positioned to sustain and enhance their living standards in the future.

ES 8: Institutional Arrangements

The PIU serves as the central body responsible for planning, implementing, and monitoring stakeholder engagement activities. CLOs act as the direct link between the project and host communities. The contractors and subcontractors will also play a role in stakeholder engagement such as assisting in organizing consultations, FGDs, and information sessions and documenting community feedback and reporting to the PIU among others. Community institutions such as traditional and community-based structures are vital in engagement. The CBOs play specific roles and while membership of some is exclusive, membership of some others is not. For instance, the Women's Groups are exclusive to women either born or married into the community, while the Youth Groups are unisex. There are unisex social groups with membership from indigenous and non-indigenous residents.

ES 7: Grievance Redress Mechanism (GRM)

The seventh chapter highlights the stakeholder engagement and participation process that underpins the RAP. From the earliest stages, the project prioritized inclusive consultation, ensuring that the voices of community members, traditional rulers, women, youths, farmers, civil society organizations (CSOs), and local government representatives were heard. Engagement activities included community meetings, focus group discussions, key informant interviews, and public consultations, all designed to capture local perspectives and address concerns.

Key issues raised during these interactions centered on land acquisition, adequacy of compensation, livelihood restoration, employment opportunities, and community development benefits. Traditional leaders served as mobilizers and custodians of trust, while CSOs and CBOs provided oversight, advocacy, and helped to guarantee transparency.

To strengthen accountability, the RAP establishes a Grievance Redress Mechanism (GRM). This mechanism offers PAPs a clear and accessible process for lodging complaints, resolving disputes, and obtaining fair redress without resorting to lengthy legal channels. The GRM is structured at multiple levels—community, local government, and project implementation unit—to ensure timely responses.

Stakeholder participation will continue beyond planning, extending into construction and operational phases, with regular information-sharing and community monitoring committees. By embedding participation throughout the project cycle, the RAP seeks to build trust, promote transparency, and ensure that both host communities and PAPs become active partners in the long-term success of the ATC.

ES 8: Implementation Schedule

The compensation payment part of the RAP implementation shall be completed before land take over. It is envisaged that it can be completed within a period of six (6) months. It is important that all structures to be rebuilt and payments for compensation are completed before project construction is commenced. This can be done progressively so construction can start on one end.

The monitoring and evaluation activities which are scheduled to be done once a year, shall commence 6 months after completion of compensation payments

ES 9: Cost and Budget

The budget and financing plan for the RAP, ensures that all resettlement and livelihood restoration activities are adequately funded and implemented on schedule. The budget covers cash compensation for crops and economic trees, livelihood restoration programs, stakeholder engagement activities, grievance redress, monitoring and evaluation, and administrative costs. The total resettlement cost is estimated at USD 45,100 reflecting both direct entitlements to PAPs and the institutional support needed to carry out the RAP effectively.

Funding will be sourced from the project fund dedicated to the implementation of the E&S safeguards instruments from the African Development Bank. Disbursement of funds will follow a structured schedule, aligned with RAP milestones such as verification of PAPs, compensation payments, initiation of livelihood restoration programs, and continuous monitoring.

A guiding principle is that livelihood restoration package / compensation must be delivered before any project activity begins on the affected land, in line with both Nigerian law and AfDB safeguard standards. Transparency and accountability will be ensured through financial oversight mechanisms and regular reporting to stakeholders.

By securing sufficient and timely financing, the RAP provides confidence that economic displacement will be fairly addressed, livelihoods will be restored, and community trust in the project will be strengthened

ES 10: Monitoring and Evaluation

The framework for monitoring, review, and evaluation of RAP implementation is set to track progress, ensure compliance with agreed standards, and measure the effectiveness of resettlement and livelihood restoration interventions. Monitoring will focus on both process indicators (such as timely payment of compensation, delivery of training, and stakeholder engagement) and outcome indicators (such as improved income levels, reduced vulnerability, and restored livelihoods of PAPs).

The framework distinguishes between internal and external monitoring. Internal monitoring will be carried out by the Project Implementation Unit (PIU), supported by the Cross River State authorities, to oversee day-to-day RAP activities and address emerging issues quickly. External monitoring and evaluation will be handled by independent agencies or consultants to provide objective assessments, verify compliance with AfDB safeguards, and ensure accountability. A RAP Completion Audit will also be conducted at the end of the process to confirm that all commitments to PAPs have been fulfilled.

Regular reporting mechanisms are established, including quarterly updates to the government, AfDB, and other stakeholders, as well as feedback sessions with communities. The inclusion of PAPs in monitoring committees ensures transparency and builds trust. Overall, this framework guarantees that the RAP does not end with compensation but continues until livelihoods are demonstrably restored and the project achieves its social sustainability goals.

1 INTRODUCTION

1.1 Background to the Study

The proposed Agricultural Transformation Centre located in Okuku, Yala Local Government Area of Cross River state is part of the Special Agricultural Processing Zones (SAPZs), a Federal Government of Nigeria's initiative driven by the Federal Ministry of Agriculture and Food Security (FMAFS) in collaboration with state governments, development partners, relevant federal ministries, departments and agencies (MDAs), and private investors and funded by the African Development Bank (AfDB), Islamic Development Bank (IsDB), International Fund for Agricultural Development (IFAD), and contributions from the Federal and State Governments.

This program aims to achieve greater economic diversification and promote long-term sustainable development. The Special Agro-Industrial Processing Zones program is a five-year program that is designed to develop multiple clusters of Agricultural Transformation Centers (ATCs) and Agricultural Transformation Centers (AIHs) within major clusters of high agricultural production, where functional infrastructures like roads, power, water, communication are provided to attract private investment into modern Agro-industrial processing and value addition to locally produced crops, livestock and related agribusiness activities.

The establishment of SAPZs in Nigeria will boost the structural transformation of the economy by providing opportunities for public and private sector investment in agriculture, and when fully operational, the SAPZs will enhance national food and nutritional security, optimize the export of value-added agricultural commodities and improve the quality of livelihoods through wealth creation for rural farming communities.

The first phase of the SAPZ Program will be implemented in seven (7) states — Cross River, Imo, Kaduna, Kano, Kwara, Ogun, and Oyo, and the Federal Capital Territory (FCT). The Program is valued at USD 538.05 million (net taxes).

The SAPZ will consist of two key components: Agricultural Transformation Centres (ATCs) and Agricultural Transformation Centres (AIHs) across the participating states and the FCT. Each facility, depending on the land area, may require Environmental Impact Assessments (ESIAs) and Resettlement Action Plans (RAPs), or Livelihood Restoration Plans and other relevant environmental and social safeguards instruments, depending on the requirements of the funding partner.

Cross River State Government has therefore appointed PGM Nigeria Limited as Environmental & Social Safeguards Consultants to carry out the Environmental and Social Impact Assessment (ESIA) for the proposed Special Agro-Industrial Processing Zone Program in Cross River State. This is in compliance with the Environmental Impact Assessment (EIA) Act Cap E12 LFN 2004, the AfDB's Integrated Safeguards System (amended 2023), as well as other national and international regulations.

1.2 Proposed Project Location

The 37.8 ha land proposed for the ATC is part of the land previously acquired by the Government of Cross River State and reserved for industrial purposes. It had been fallow and farmers took advantage of that to cultivate their crops. This Resettlement Action Plan (RAP) has been prepared to address the social and economic impacts of land repossession, ensuring fair compensation and livelihood restoration for affected farmers and households who use portions of the land solely for farming.

The proposed ATC project site in Okuku, Yala LGA is located at latitude $6^{\circ}41'5.05''N$; longitude $8^{\circ}47'0.45''E$ along Ogoja-Yala highway in Okuku, Yala local government area of Cross River State and it covers 37.837 hectares of land owned by the Government of Cross River State but is used by the indigenes for cultivation of rice, yam, maize, groundnut and other crops, etc. The project site is located 350m north of Ogoja Rice Mill. Eastward, the proposed project site is located opposite Godwin Ali Cantonment and Army Barracks which are 700m and 1061m away from the site respectively. Other major landmarks around the proposed project site include Bakor Polytechnic Ogoja which is 1600m southward, University of Cross River State, Okuku Campus which is 2748m northward, Pollygals Hotel, which is located 2466m northward, among others. The drainage map of the study area shows that two first order streams under Ogoja watershed traverses the proposed project site at latitude $6^{\circ}40'59.65''N$; longitude $8^{\circ}47'9.08''E$ (eastward) and latitude $6^{\circ}40'58.67''N$; longitude $8^{\circ}46'58.16''E$ (westward) before joining at a confluence outside the project site at latitude $6^{\circ}40'48.45''N$; longitude $8^{\circ}47'10.07''E$ which is 250m west of Ogoja Rice Mill (Figure 2).

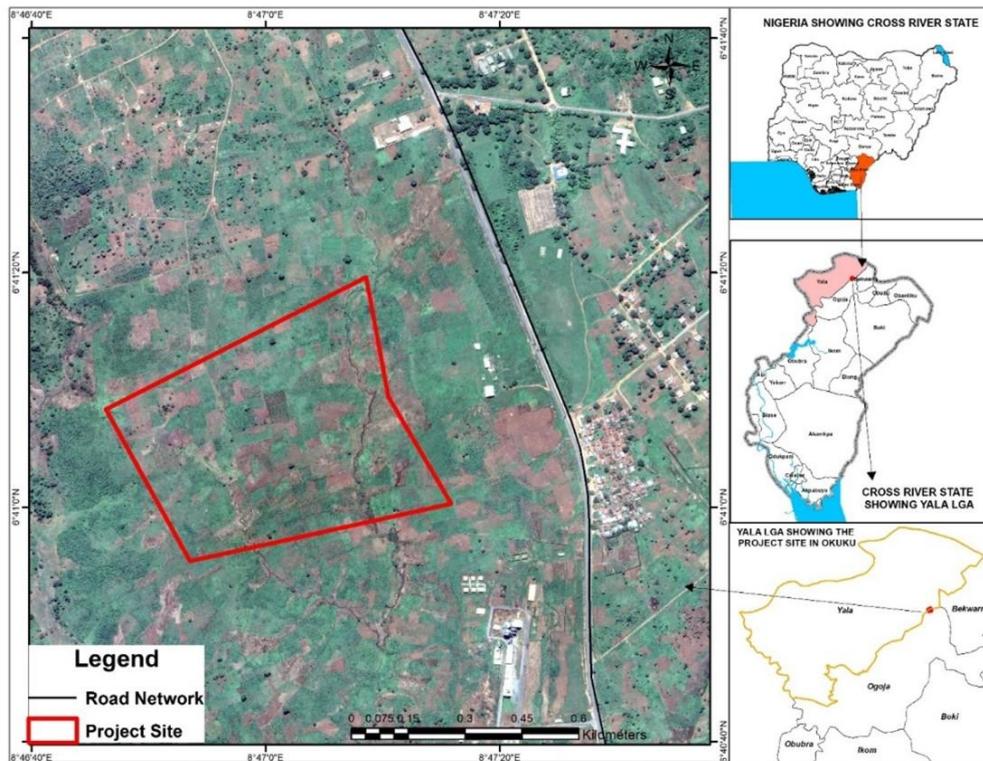


Figure 1: Location Map of the Cross River State Special Agro-Industrial Processing Zone (SAPZ) in Okuku, Yala LGA.

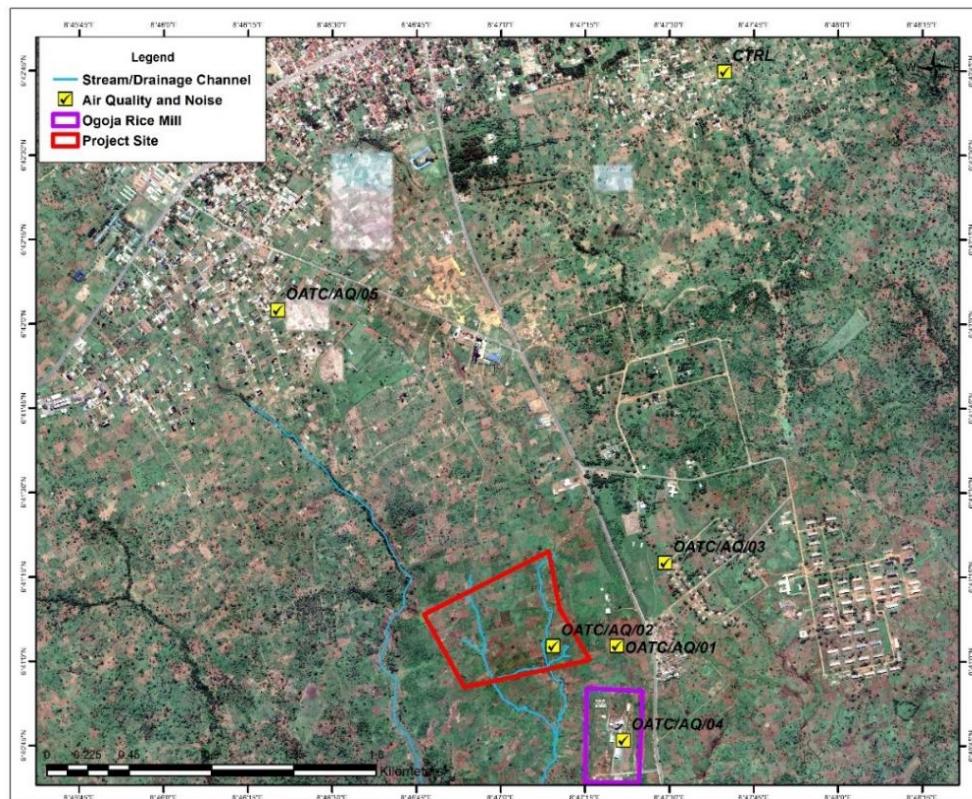


Figure 2: Satellite Imagery Showing Landmarks Around the Project Site in Okuku, Yala LGA.

1.3 Proponent's Intent & RAP Objective

The proposed project is expected to have both negative and positive impacts on the environment and people of the area and it is recognized that comprehensive planning and management of environmental and socioeconomic issues are essential to the execution of any successful project. As such, the RAP process seeks to fully integrate and socioeconomic considerations into the life cycle of the proposed project.

CR-SAPZ, the proponent, therefore, has undertaken the environmental impact assessment (ESIA), in parallel with the conceptual design of the project, to ensure that any identified adverse impacts are addressed in the detailed design and mitigated during the development stages which involves site preparation, construction, commissioning, operation, decommissioning and abandonment.

The purpose of this RAP is to assess the potential and associated impacts of the project and project-related activities on the socioeconomic resources, especially land, and where applicable to proffer measures to enhance positive impacts and to avoid, reduce or mitigate (compensate) negative impacts to the tenants who are using portions of the affected land for farming; and develop cost-effective livelihood improvement plan for them, to make the proposed project sustainable. This RAP has been developed in alignment with the African Development Bank's Integrated Safeguards System (AfDB ISS) and in compliance with relevant Nigerian regulatory frameworks.

1.4 Project Description

The proposed Agricultural Transformation Centre (ATC) is being developed through a Design, Build and Operate (DBO) / site and services model. It is planned to sit on a 37.8 ha of land (Figure 3). Ancillary to the proposed ATC is an existing, moribund rice mill established and owned by the Government of Cross River State. The ATC is planned to provide common infrastructure and facilities to the expected 11 agro-industries of various scales, ranging from small to medium and large which will be established, owned and operated by prospective investors. This ESIA covers only the common infrastructure and facilities of the project as detailed in subsequent sections of this chapter. The prospective agro-industries will take advantage of this ESIA when approved, to carry out their individual E&S assessments as will be required of them prior to establishment.

1.5 ATC Layout

Based on the value chain needs of the ATC, the site layout is developed. The required facilities are as shown in Table 3. The site layout is shown in Figure 3.

1.6 Components of the Agricultural Transformation Centre (ATC) at Okuku

The proposed ATC Agricultural Transformation Centre (ATC) infrastructure will include office buildings, training centres, general services fencing, internal access roads/parking, drainage, power supply, water, and sewerage, effluent management, health, and safety) specialized services will include quarantine, quality control, lab. and certification centres. breeding centres, business support services (administrative knowledge/ ICT/procurement /employment centres, and activities to implement the ESMP.

The proposed ATC will have common on-site and off-site infrastructures and facilities for the use of all tenants and operators. These will include access and internal roads and drainage, power and water supplies, solid and liquid waste management facilities, warehousing, market, etc.

1.7 On-Site Infrastructure and Facilities Planning

On the basis of function and facilities required for the ATC, on-site infrastructure is planned as described in Table 1, Table 2, Table 3 and Table 4

Table 1: ATC Site provisions

SN	Description	Remarks
1	Land Development	Site grading works will only be for the road and general infrastructure area, to enhance economy and environmental considerations. The vegetation along the water courses, accounting for about 6.5 ha of the proposed site (Figure 2) shall be conserved green to retain the carbon sequestration capacity of the site. The entire site has crops that would be harvested before construction. There are 62 trees in the land will be left, as much as possible, standing.
2	Boundary wall and fencing	A wall fence to surround the zone is planned. This will enhance the security of the project. The total approximated length of the fence is 2.6 km. Trees shall be planted at 10 m interval along the internal fence line to enhance the carbon sequestration capacity of the facility and compensate for the 32,220 m ³ of biomass that will be removed during site clearing. Approximately, 57,200 pieces of sancrete blocks will be used to erect the perimeter fence.

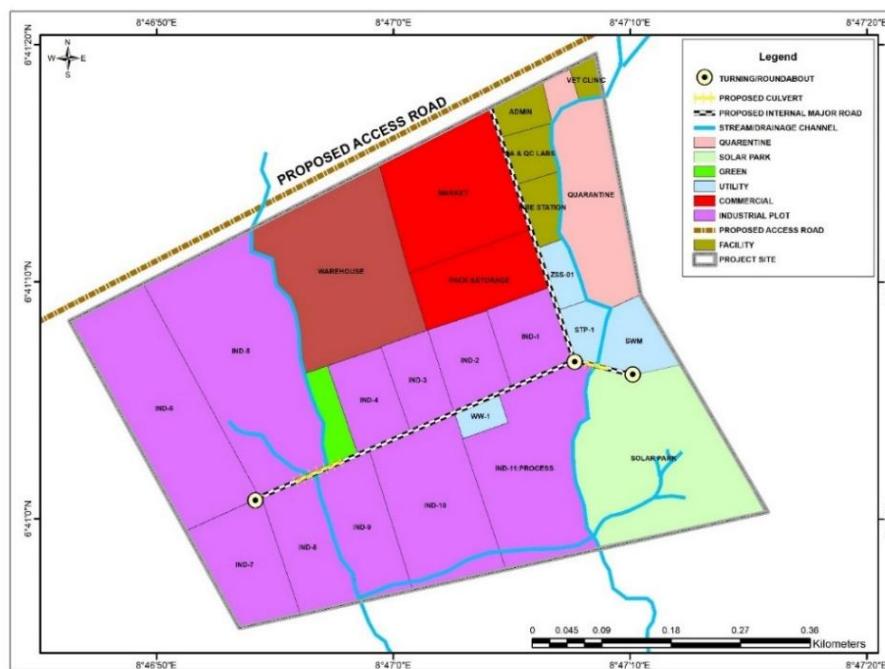
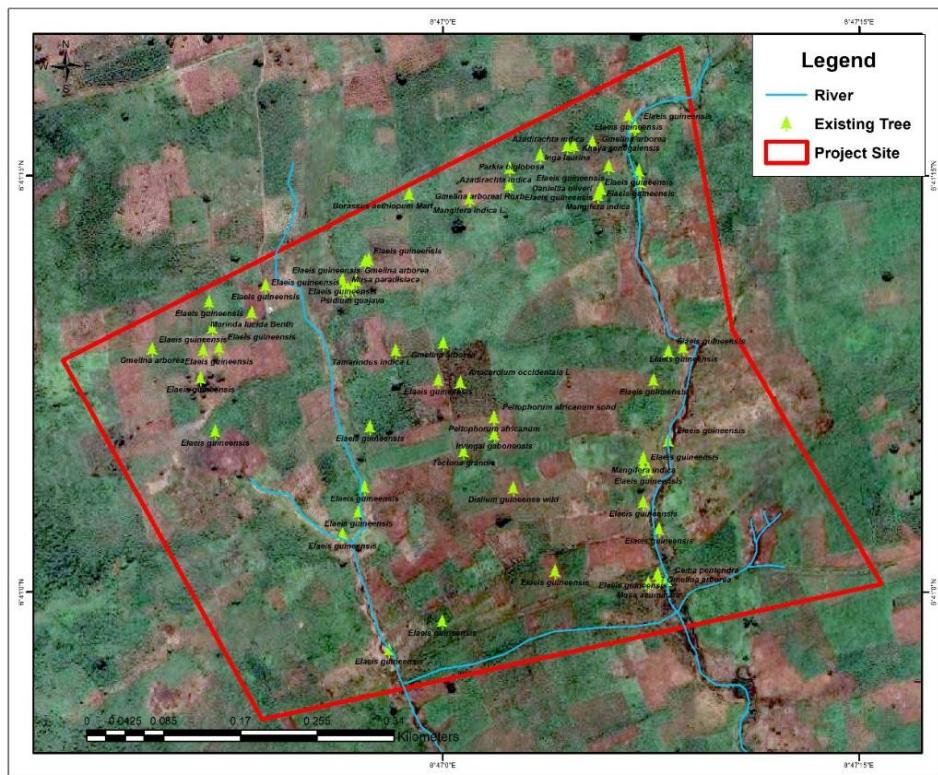


Figure 3: Proposed ATC Layout



Map Showing Existing Trees Within the Project Site

Figure 4: The ATC site showing the existing trees to be conserved (in green)

Table 2: Facilities and components in the proposed ATC

Description	Area (SqM)
Perimeter Fence	650
Gate /gate house	250
Security outpost	250
Commodity service Centre	3,000
Commodity processing Centre	5,692
Industrial / Employment zone	28,462
Truck Park	20,000
Community vocational Centre	5,000
Residential area	15,000
Water facility (boreholes, overhead tanks/steel towers & reticulation)	1,000
Water treatment plant	1,000
Power facility	1,000
Storage warehouses	5,000
Cold storages (meat etc.)	3,000
Fuel station	1,500
Solid waste management plant	1,000
Sewage and effluent treatment plant	1,000
Fire station	1,000
Admin. Block	1,000

Description	Area (SqM)
Commodity loading and uploading bays	5,000
Veterinary clinics and Health centre	350
Health centre	350
Market	10,000
Recreational	2,000
QA&QC lab	350
Knowledge centre	800
Procurement centre	500
Agric equipment centre	3,000
Bank + ATM services	600
Small scale industrial zone	55,000
Medium scale industrial zone	55,000
Large scale industrial zone	55,000
Future development area	30,000
Green area	65,246
	378,000

Table 3: ATC component capacity and lifespan details

Component	ATC Project Components	
	Capacity / Specification	Design Life (Years)
Internal Roads	2902 Rmt, Flexible pavement, 18m ROW with solar street lights	20
Drains	5804 Rmt, RCC rectangular, 600 mm wide	30
Power Demand	Peak Load 13 MVA (Installed capacity 500 KVA)	N/A
Substation	1 Compact substation (500 KVA)	20
Electrical Distribution	3.8 km	20
Borewells	2 Nos, Depth 200 m, Yield 65 m³/hr	20
Storage Tanks	500 KLD, Ground-level RCC tanks	35
HDPE Distribution Pipes	3.8 km, PN 10, 225–280 mm diameter	25–50
Wastewater Generation	750 KLD, Domestic + Industrial mix	N/A
STP Type	MBBR technology	
STP Capacity	500 KLD	
STP Lifespan (Civil)		35
STP Lifespan (Mechanical)		15
Sewer Network	3.8 km, HDPE 225–280 mm diameter	25–50
Admin / R&D / Other Buildings	RCC framed, GI roofing	50–60
Public Toilets	60 sqm, 16 WCs	30–40
Fire Station	75 sqm, RCC, 24x7 manned	40–50
Gate & Gatehouse	RCC structure	40–50
Chain Link Fencing	2600 Rmt, 2m height, steel posts with concrete foundation	15–20

Table 4: Facility Design Details

Design Details of ATC		
A	Area in Ha	37.8 ha (green area – 6.5 ha)
B	Time period (ATC+ATC)	
	Design	4 Months
	Construction	18 Months
	O&M (Including DLP)	60 Months
C	Internal Road	Length: 1902 Rmt ROW: 18m wide, with solar street lights and channel kerbs.
D	Drain	Length: 3804 Rmt - ranging from 500mm x 500mm to 1000mm x 1000mm
E	Electrical	
	Power Source	0.2 Km to the substation, 33 kV line along the plot Boundary
	Power Demand	13MVA
	Distribution length	3.8 km
	Sub-station	Compact substation of 500 kVA
F	Water	
	Source	Ground Water (Unless state brings surface water to the site)
	Demand	1500 KLD
	Borewell	2 Nos
	Storage	500 KLD Capacity
	Distribution	3.8 Km of HDPE pipe ranging from 225 mm to 280 mm
G	Wastewater	
	Generation	750 KLD
	STP	500 KLD
	Conveyance	3.8 Km of HDPE pipe ranging from 225 mm to 280 mm
H	Buildings	1. Administrative Block + Research and Development + Disaster Management - 400 Sqm
	Fire station	75 Sqm - with Shed for fire tender (Does not include cost of fire tender)
	Public Toilet	60 Sqm - 8 WCs x 2
I	Gate & Gatehouse	1 Nos
J	Boundary wall	2600 Rmt - Chain Link Fencing
K	Access Roads	1.2 km

1.8 The Need for the Project

The need for the proposed ATC stems from the existence of constraints on crop value chains, especially for cocoa, cassava and rice, in Cross River State as summarized in Table 5.

Table 5: Crop value chain constraints in Cross River State

Production Constraints	Marketing Constraints	Processing Constraints
Low yield	Inadequate access to appropriate packaging material	Inappropriate processing technologies particularly among small-scale millers
Pest and diseases which limit optimum yield in most of the production areas of state;	Price fluctuation	Poor equipment maintenance support by dealers, shortages and high cost of equipment and spares
Limited access to information from extension service.	Inadequate sources of finance	Erratic power supply and increased cost of fuel
Inadequate certified inputs such as seeds, fertilizer and herbicides etc	Small traders have limited storage capacity and thus are committed to a continuous cycle of buying and selling.	Unreliable supply of produce

A large percentage of households in rural areas of Nigeria are dependent on subsistent farming for survival, with majority of them being smallholder farmers. While they have the landmass as compared to the cities, such factors as youth migration, limited access to funding, infrastructure and technology among others are causing an increasing decline in food security. A solution to these food security challenges will increase agricultural output, create jobs and improve livelihoods for its citizens. Another benefit of this strategy is the creation of job opportunities, reduced cost of living, diversification of the Nation's economy and generally enhancing sustainable development.

The agricultural sector of Nigeria remains largely untapped and poses bright prospects for the her to tap into for the country's general development. The establishment of SAPZs in Nigeria (Cross River State) will boost the structural transformation of the economy by providing opportunities for public and private sector investment in agriculture, and when fully operational, the SAPZs will enhance national food and nutritional security, optimize the export of value-added agricultural commodities and improve the quality of livelihoods through wealth creation for rural farming communities.

1.9 Benefits of the Project

The SAPZ initiative will diversify the nation's economy, creating another major avenue for revenue generation out of the agricultural sector. The success of this project will improve food security in Cross River state, improve inter-state and largely inter-country export opportunities and in turn boost the economy of the state and largely that of the nation while creating job opportunities, improved livelihoods and ultimately, the reduction of poverty

Socioeconomic Benefits of the Project

In line with the efforts of the federal government of Nigeria in the diversification of the economy via vehicles of promoting the non-crude oil export sector, the SAPZ project presents similar objectives, which aligns and complements the activities of the government.

The project will further complement the drive of the government. Agricultural Development remains one of the most viable sectors in lifting people out of poverty and creating sustainable economic growth and shared prosperity. Furthermore, Agro-industrial processing creates an accelerated increase in farmers' productivity; this, in turn, helps to reduce post-harvest losses, market access creation and deepening of the crop value chain.

The current agricultural promotion drives of the federal government of Nigeria, when combined with development efforts of the private sector, will create a multiplier effect in bringing about the sustainable development goals of food security, economic development and shared prosperity. The project, when implemented, will bring about the rapid economic development of the host communities and reduce rural-urban migration.

The project will go a long way in creating market access for the target crops and other agricultural produce; this will effectively reduce the prevalent post-harvest losses, which characterized smallholder farming in Nigeria. The creation of out-grower scheme would ensure the training of thousands of farmers on Good Agricultural Practices, modern Agronomy, post-harvest handling etc.; this knowledge transfer will translate to capacity building for the farmers in the programme to improved productivity.

The creation of jobs along the value chain of the target crops and employment is also expected to boost agricultural and economic productivity in the area. In conclusion, through the SAPZ business activities, the much-needed foreign exchange, more revenues will be generated for the government to boost government spending; this is done through various payments such as taxes, tariffs to the federal and state agencies tasked with such collections.

The benefits of the SAPZ project are enormous to Agricultural development in Nigeria. However, the specific benefits have been categorized into three namely:

Benefits for the Government

The project will improve the business environment and increase the ease of doing business in the various project sites. This will increase trust between the government and investors and encourage more private investors' involvement.

Benefits for the Community

- **Security:** The project will improve the internal security of the community and will protect assets.
- **Financial and social inclusion:** The project will provide access to financial services to agricultural value chain actors within the project communities. Also, improve the Socioeconomic status of the value chain actors within the project sites.
- **Road Access:** The project intervention will develop infrastructure, especially road access to the relevant facility for easy transportation of produce and people.
- Human capacity development in specific skills and availability of technical personnel: The project will provide training for a specific group of people, especially youths and women, on specific skills.
- **Market accessibility:** The project will create a ready market that is easily accessible to the relevant actors.

- The project will create mass employment opportunities for the youths and women within the project sites. This will create a ripple effect in the neighbouring communities. Thus, improving the local economy.
- Community development through CSR programme by the private sector.
- Reduction of post-harvest losses due to short distance to market and increase in value addition.

Benefits for the Investors

- The project will increase production efficiency by reducing the costs of production. This will be achieved through State policies of low-cost land-lease, low-cost labour, tax waiver for up to a maximum of 7 years (100%), and Corporate Social Responsibility credits for tax reduction after seven years within the project sites.
- The cost of infrastructure maintenance is low as it is a shared facility, which reduces the cost of operations within the project sites.
- The infrastructures built at the project sites are of world-class standards, and it will be easy to implement food safety standards such as HACCP, ISO 22000, NAFDAC, SON, and GMP and other international certifications for processing activities.

Revenue Drivers

The expected revenue drivers of the proposed ATC are presented in Table 6

Table 6: Revenue Sources

Revenue sources	Details
Revenue from developed plots of the ATC – industrial, residential, commercial and social sections	<ul style="list-style-type: none"> ➤ The ATC shall actively market the multi-formatted developed plots for mixed-use like industrial, commercial, residential and social areas. ➤ The management of the ATC would enter into a long-term leasehold/short term lease/yearly lease/monthly rental with occupant industries, residential, commercial, and institutional areas users; and ➤ Income generation from undeveloped land long-term leasehold, developed land short-term lease, developed yearly land lease, developed land monthly lease rentals.
Revenue from built-up spaces – industrial, residential, commercial and social sections	<ul style="list-style-type: none"> ➤ The ATC shall also actively market the multi-formatted built-up spaces for mixed-use like industrial, commercial, residential and social areas. ➤ The management of the ATC would enter into long-term leasehold/short-term lease/monthly lease rental for the usage of the built-up spaces with the occupant industries, commercial, residential, and institutional area users; and ➤ Income generation from built-up space - long-term leasehold, built-up space – short term lease, built-up space – monthly lease rentals.

Revenue sources	Details
Revenue from facility management	<ul style="list-style-type: none"> ➤ There will be M & E on ATC utilities and infrastructure facilities to ensure delivery of design standards in service are given paramount importance. The ATC operating principles shall need to adhere to the highest standards of workers safety, hygiene, and environment and shall need to conform with various national and international standards; and ➤ The income from facility management.
Revenue from operations of specialized agriculture infrastructure facilities	<ul style="list-style-type: none"> ➤ Income from operations of specialized agro infrastructure within the ATC covering warehoused, procurement centres, packing & labelling, grading & sorting, quality assurance and quality control laboratories, administrative building, etc.
Income from energy supply	<ul style="list-style-type: none"> ➤ Income from energy supplied to operators and service providers within the ATC. The primary source of power is through external power supply from the national grid, and also provision from standby power generation units is provided.
Revenue from the water supply	<ul style="list-style-type: none"> ➤ Income from water fees charged on usage by operators
Margins from commercial and common social infrastructure	<ul style="list-style-type: none"> ➤ Income from shared services and infrastructure
Income from business support	<ul style="list-style-type: none"> ➤ Income earned from various business support services
Income from business facilitation	<ul style="list-style-type: none"> ➤ Income from various business facilitation, link-ups, produce marketing support, branding, etc.
Margin from auxiliary services	<ul style="list-style-type: none"> ➤ Income from food courts, restaurants, banks, vending machines, etc.
Revenue from advertisement	<ul style="list-style-type: none"> ➤ Revenue from advertisements, billboards, trade shows, etc.
Truck parking	<ul style="list-style-type: none"> ➤ Revenue from vehicle and truck parking lots, loading bays, etc.
Weighbridge	<ul style="list-style-type: none"> ➤ Fees charged on weighing of trucks and lorries based on weight

1.10 Value of the Project

Table 7 and Table 8 summarize the potential value chains for two of the three major crops for the CR-SAPZ, cassava and rice, respectively.

Table 7: Potential Cassava Value Chain

Potential value	Details
Potentials for value addition	<ul style="list-style-type: none"> ✓ Increase yields from 9 ton to 30mt / ha ✓ Availability of improved varieties ✓ Production/processing of industrial products such as ethanol, starch, etc. ✓ Import substitution potentials ✓ Availability of improved processing techniques

Potential value	Details
Market potentials	<ul style="list-style-type: none"> ✓ There is an opportunity for grouped sales by organized smallholder producers or cooperatives upon meeting the off-taker requirement, ✓ Stable price ✓ High industrial demand ✓ Export potential of cassava by products
Potential for pro-poor growth Gender relevance	<ul style="list-style-type: none"> ✓ Women farmers are actively involved in cassava production ✓ Marketing of cassava related products are dominated by women ✓ Retail selling is mainly female business ✓ Small scale processing is dominated by women ✓ Industrial processing is dominated by men
Job creation in downstream sectors	<ul style="list-style-type: none"> ✓ High potential in small-scale processing ✓ Export ✓ High potential to attract FDI ✓ Transportation/logistics ✓ Artisanal and industrial processing will generate significant number of jobs

Table 8: Potential Cocoa & Rice Value Chains

Potential value	Details
Potentials for value addition	<ul style="list-style-type: none"> ✓ Improved quality of processed cocoa beans & milled rice, especially reduction of impurities and stones by better harvesting and processing techniques ✓ Innovations for farm machinery/extension services ✓ Soil testing for optimum fertilizer application ✓ Training on GAP (including fertilizers, herbicides, etc.) ✓ Promotion of agro machinery service providers ✓ Capacity building for machinery and equipment operators (power tiller, mills, etc.) ✓ Linkages to effective financial services/literacy trainings/management ✓ Improved quality of certified seeds ✓ Strengthened linkages among the value chain actors ✓ Availability of credible market information
Market potentials	<ul style="list-style-type: none"> ✓ Huge deficit demand and supply of rice in Nigeria ✓ Availability of off-takers all over the country ✓ Import substitution potentials

Potential value	Details
Potential for pro-poor growth	✓ Women are actively involved in processing and production
Gender relevance	✓ Marketing of rice paddy and cocoa beans is predominantly carried out by men and youth
	✓ Retail selling is mainly female business
Small scale processing is dominated by women	
Job creation in downstream sectors	✓ High potential to attract FDI ✓ Transportation/logistics ✓ Seed breeders and multipliers ✓ Small and large-scale production, marketing and processing will generate significant number of jobs
Natural endowments	✓ Favorable climatic condition such as low temperature and optimum relative humidity during large part of the year
Profitability	✓ Highly profitable upon meeting the requirement of the buyers and off-takers

1.11 Envisaged Sustainability

Sustainability is the ability of a development project to maintain or expand a flow of benefits at a specified level for a long period after project inputs have ceased. The concept of sustainability means different things to different activities, organizations and developments. Specifically, for the project, sustainability means, ensuring the project continues to maintain its operations, provide its services and deliver its long-term benefits during implementation and projected life span. The sustainability of the proposed project is evaluated and described below using the following dimensions/ factors, namely: environmental, social, economic and technical considerations.

Social Desirability

The ATC project prioritizes her stakeholders' perception, especially the acceptance of the hosts communities. Stakeholders' Engagement and Grievance Redress Mechanisms have been established throughout the project life cycle to address the needs of stakeholders. The engagement process already commenced from the scoping stage all through the field data gathering exercise to the public consultation held with stakeholders on the outcome of the ESIA. It is envisaged that the effective implementation of the E&S safeguards instruments, including the Livelihood Restoration Plan, will ensure social desirability of the project. Additional measures to ensure social sustainability of the project, will include the following:

- Inclusion of vulnerable groups such as elderly people, female heads of household, children and youth, racial and ethnic minorities, displaced persons, women and girls etc.
- Implementation of Corporate Social Responsibility (CSR) programmes targeted at improving Socioeconomic and health status in project affected communities will be embarked upon.

- Employment of as many local inhabitants of the host communities as possible during all phases of the project. Contractor's employment policy shall give preference to indigenes of these communities in a bid to ensure that they benefit directly from the project.
- promote training, mentorship and development opportunities to prepare talented employees for successful succession

Economic Viability

The economic viability of the proposed ATC project is based on the fact that it will eliminate agricultural and agro-industrial constraints, improve productivity, and therefore Return on Investment (ROI), improving exports to other states and outside the country as well. Additionally, the expansion of local markets is imminent with the inception of the project. The ATC project is designed to create both direct and indirect labour, skilled and unskilled workers for both indigenes and non-indigenes, which will in turn improve livelihood of the people and bring economic development to the state and the country at large.

1.12 Development Options

No Project Option

This is a do-nothing option. This option implies that the ATC project will not be implemented and the status quo will be maintained with the attendant challenges of food shortages and insecurity in the state and the country at large. This option if adopted will represent a major setback for the initiatives and efforts of the Federal Government of Nigeria strategy to alleviate poverty by improving the agricultural sector. In addition, the inherent Socioeconomic benefits of the project including stimulation of economic activities, job creation, improved livelihood, poverty reduction among others This option was neither socially desirable nor economically viable and was therefore rejected.

Delayed Project Option

The delayed project option implies that the project will be suspended and implemented in the future. This option may prolong the realization of the Federal Government of Nigeria strategy to alleviate poverty by improving the agricultural sector. In addition, the agricultural shortfalls of the state and the Nation will remain the same with grave implication for the economic development of the State and the nation in general. Furthermore, this option is not economically sustainable as huge amount of money will continue to be spent on importation of food products which provides only temporary solutions to the inherent problems. The project cost may also increase significantly given the unstable currency and exchange rate around the world. This option is therefore rejected because it is socially and economically unsustainable.

Immediate Project Implementation

This option implies that the project will go ahead as planned. Adoption of this option will ensure the realization of the numerous benefits of the project, especially the enormous associated socioeconomic benefits to the State, Region and Nation as a whole. This option is therefore the preferred option.

1.13 Project Site Alternatives

Site suitability assessment is a critical process in determining the best use of land resources, particularly for agriculture. Geographic Information Systems (GIS) combined with Multi-Criteria Analysis (MCA) techniques provide a powerful framework for integrating various biophysical, environmental, and Socioeconomic factors to assess the optimal locations for agricultural development. In this research, the GIS and MCA technique was adopted in selecting suitable site for the Special Agro-Industrial Processing Zone (SAPZ) in Cross River State. Four different locations were assessed and they include: Bumbe in Obudu, Okuku in Yala, Mbube in Ogoja and Abuagbor in Bekwarra LGA.

The major relevant factors that influence crop growth and agricultural productivity considered in the analysis include biophysical factors (land-use and elevation/relief, drainage, etc.), Socioeconomic factors (proximity to roads/markets), environmental factor (drainage and flood risk). The parameters were assessed and reclassified based on their suitability status. For instance, in the land-use map, built-up areas were reclassified as 'not suitable' while fallowed/cultivated farmlands were reclassified as 'highly suitable' areas. Similarly, site that are closer to access road and market were classified as highly suitable and vice versa.

In assigning weight to the identified parameters, Analytical Hierarchical Process (AHP) and expert knowledge was used to assign importance to each factor. The AHP involves pairwise comparisons between criteria and consistency ratio (CR) to check judgment reliability. The reclassified parameters were integrated to form a suitability map using the formula in the raster calculator (ArcGIS 10.8). the result was classified into four suitability classes: highly suitable, moderately suitable, marginally suitable and not suitable.

Consequently, GIS-based MCA offers a systematic, reproducible, and spatially explicit approach to agricultural land suitability assessment. When well-executed, it provides robust decision-support for policymakers, planners, and farmers aiming for sustainable agricultural development. From the result in this analysis, among all the sites selected, the proposed site at Okuku was observed to be highly suitable for the project as it meets all the criteria. While other locations (Bumbe in obudu) recorded difficult terrain, Abuagbor in Bekwarra recorded poor access to main road, market and high level of insecurity.

On the other hand, Okuku was observed to be highly connected to the major roads and market, with moderate topography to support the intention of the project as well as agricultural land-use type. These attributes qualify Okuku as a suitable site for the project (Figure 5 and Table 9).

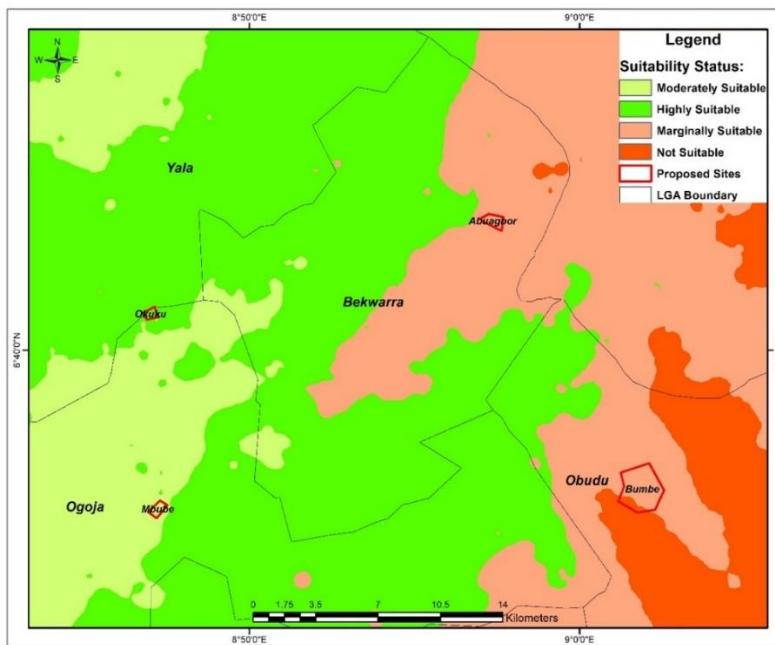


Figure 5: Site Suitability Map for the proposed ATC Using GIS and MCA Techniques

Table 9: MCA for site selection

SN	Site Location	Criteria							D
		Land Availability	Relief	Inter-modal Accessibility	Security	Proximity to farmers	Proximity to markets	Score (%)	
1	Bumbe in Obudu LGA	6	4	3	3	6	4	43.33	R
3	Mbube in Ogoja LGA	7	6	5	6	7	5	60	R
4	Abuagbor in Bekwarra LGA	6	5	6	4	5	6	53.33	R
2	Okuku in Yala LGA	7	9	7	8	9	9	81.67	S

Weights: 0 = Not suitable; 1-3 = Marginally suitable; 4-6 = Moderately suitable; 7-10 = Highly suitable. D = Decision; R = Rejected; S = Selected.

General Construction Work scope

Figure 6 presents flow chart of the work scope and the principal sequence of construction works process for the infrastructure while Figure 7: Proposed Project Execution Schedule shows the proposed project execution schedule.

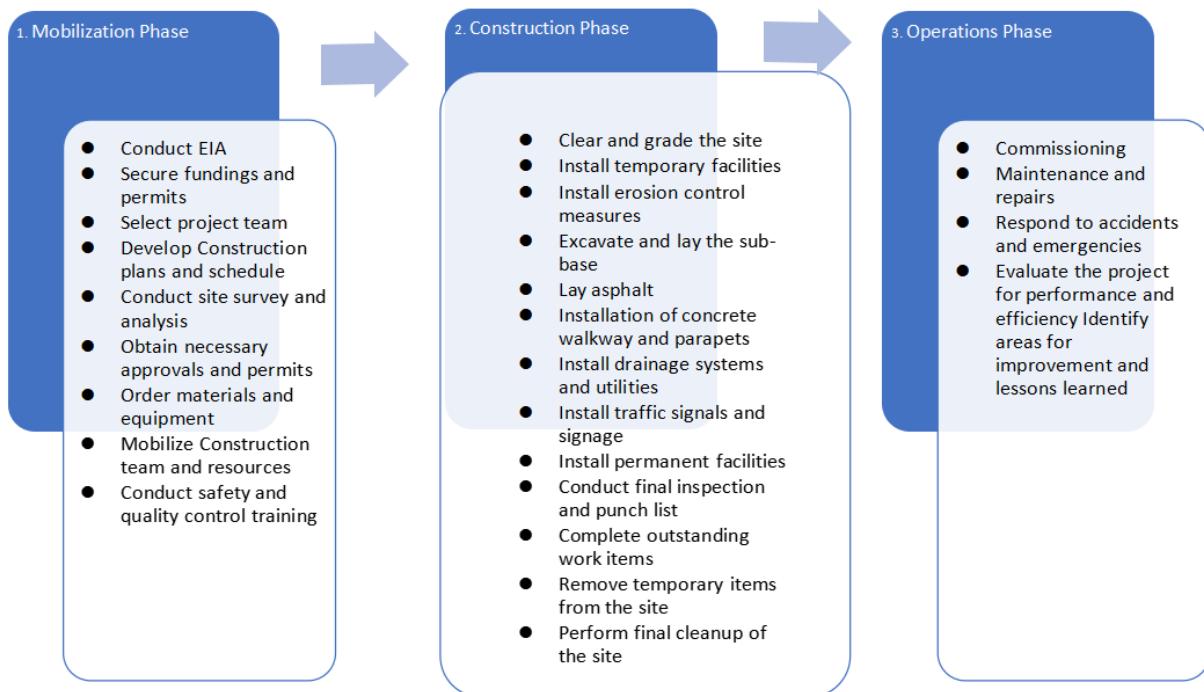
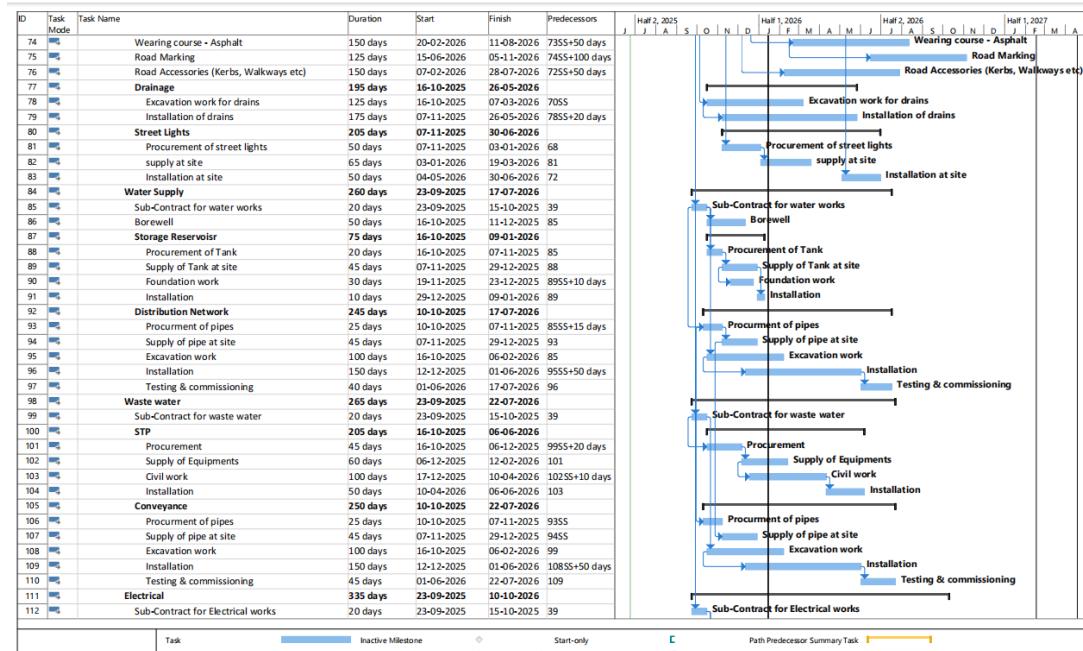
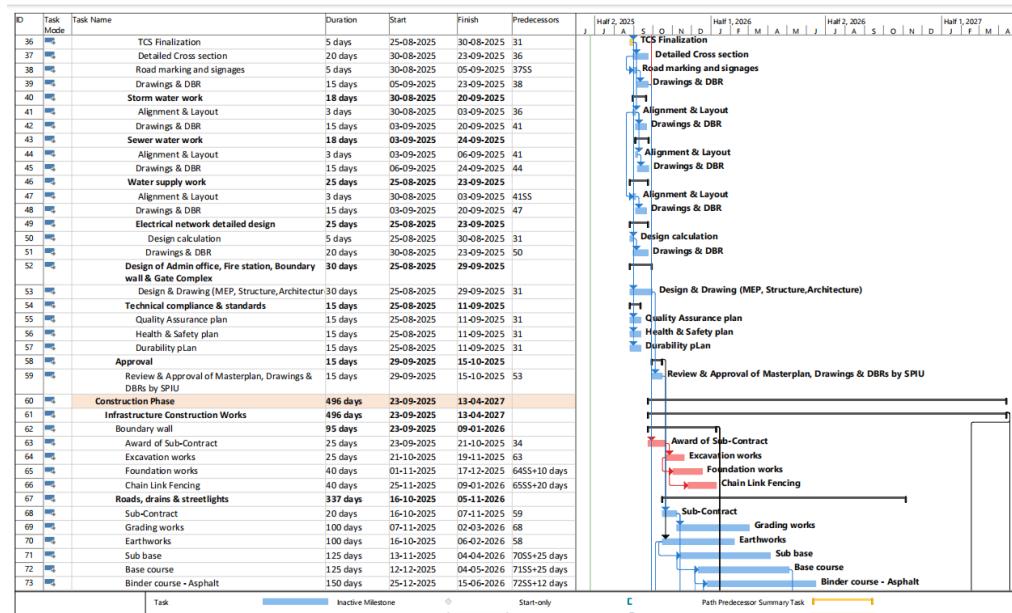
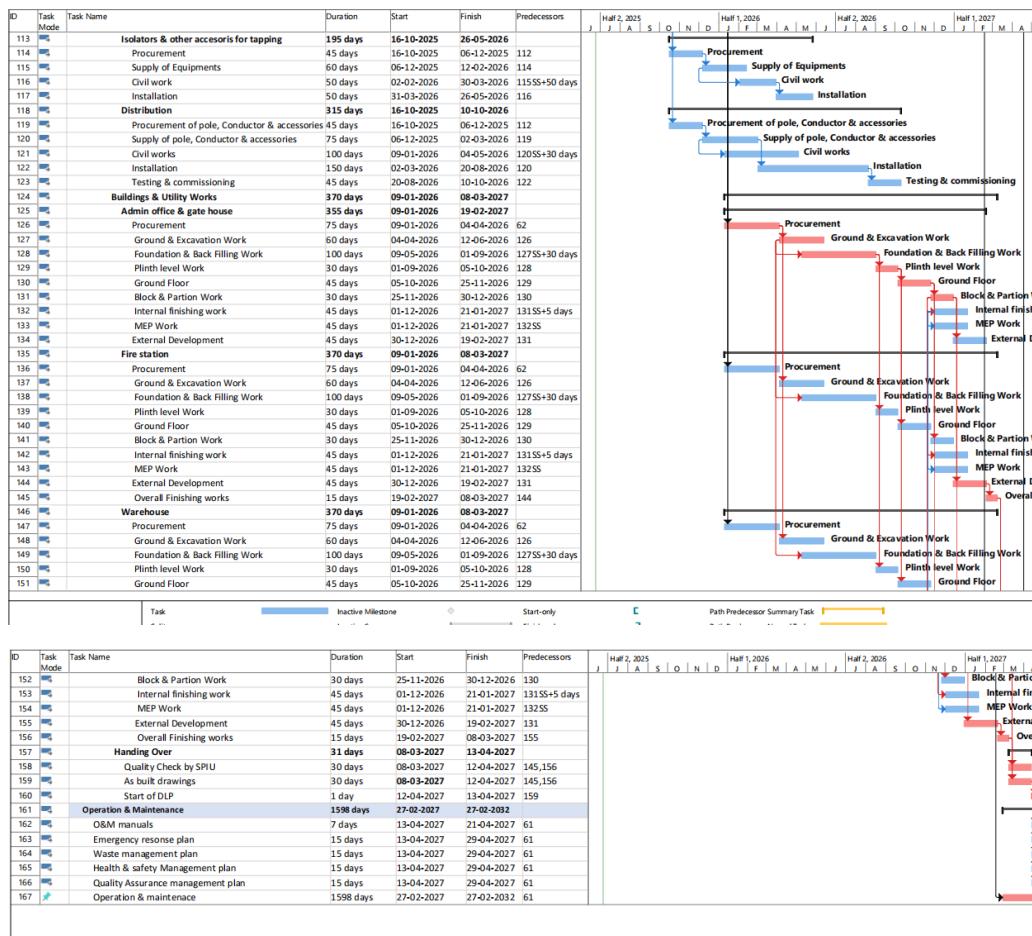


Figure 6: Flow chart of the work scope

ID	Task Mode	Task Name	Duration	Start	Finish	Predecessors	Half 2, 2025	Half 1, 2026	Half 2, 2026	Half 1, 2027
							J J J A S O N D	J J F M A M J	J J A S O N D	J J F M A
0		CROSS RIVER AIH & ATC (DBO)	2139.25 days	19-06-2025	27-02-2032					
1		SAPZ (Design & Construction)	580.13 days	19-06-2025	13-04-2027					
2		Project Kick-off	18.13 days	19-06-2025	09-07-2025					
3		Signing of Contract agreement	1 day	19-06-2025	19-06-2025					
4		Work Programme & submission of BEME	1 day	23-06-2025	23-06-2025					
5		Project Kick-off meeting	1 day	23-06-2025	23-06-2025					
6		Submission of Mobilisation Advance Guarantee, and credit of advance	14 days	24-06-2025	09-07-2025	4				
7		Submission of Performance Security	7 days	24-06-2025	01-07-2025	5				
8		Boundary demarcation for AIH & ATC by SPIU (Access road co-ordinates by SPIU)	14 days	24-06-2025	09-07-2025	5				
9		Right to access (including community rehabilitation & resettlement, permit to construct, power & water connection	14 days	24-06-2025	09-07-2025	5				
10		Site Infra structure	65 days	09-07-2025	22-09-2025					
11		Procurement for office setup	20 days	09-07-2025	01-08-2025	8				
12		Supply, Installation of Container offices	45 days	01-08-2025	22-09-2025	11				
13		Mobilisation of Resources	10 days	01-08-2025	13-08-2025	12SS				
14		Design Phase	111.38 days	09-07-2025	13-11-2025					
15		Surveys	111.38 days	09-07-2025	13-11-2025					
16		Topographic Survey	31 days	09-07-2025	14-08-2025					
17		Appointment of Topo survey vendor	14 days	09-07-2025	25-07-2025	8				
18		Conduct Topo Survey	10 days	25-07-2025	06-08-2025	17				
19		Review & Consent by SPIU	7 days	06-08-2025	14-08-2025	18				
20		Geotech & Hydrological Surveys	111.38 days	09-07-2025	13-11-2025					
21		Appointment of Geotech survey vendor	14 days	09-07-2025	25-07-2025	8				
22		Conduct Geotech survey	15 days	25-07-2025	12-08-2025	21				
23		Review & Consent by SPIU	7 days	12-08-2025	19-08-2025	22				
24		ESIA by SPIU	111.38 days	09-07-2025	13-11-2025					
25		ESIA reports	111.38 days	09-07-2025	13-11-2025	8				
26		Master Planning & Engineering	55 days	14-08-2025	15-10-2025					
27		Preliminary Master Planning & Design	25 days	14-08-2025	11-09-2025					
28		Preliminary Masterplan	10 days	14-08-2025	25-08-2025	19				
29		Review & approval by SPIU	15 days	25-08-2025	11-09-2025	28				
30		Detailed Master Planning	10 days	14-08-2025	25-08-2025					
31		Detailed Master Plan	10 days	14-08-2025	25-08-2025	19				
32		Detailed Design & Building Architecture	30 days	25-08-2025	29-09-2025					
33		Boundary Wall	10 days	11-09-2025	23-09-2025					
34		Design Detail for Boundary wall	10 days	11-09-2025	23-09-2025	29				
35		Road work	25 days	25-08-2025	23-09-2025					





2 Legal and Administrative Framework

The legal, regulatory and policy framework for carrying out the ESIA of the proposed project is contained in the applicable acts and regulations of the Federal and State Government, statutes and international conventions to which the Nigerian Government is a signatory. Various environmental studies and related strategic initiatives would meet or surpass the relevant Nigerian and international environmental legislative requirements and guidelines. These include but not limited to:

2.1 2.1 Cross River State

Cross River State relies on the Nigerian Land Use Act of 1978 and project-specific frameworks, such as the Resettlement Policy Framework (RPF) for projects like the Rural Access and Agricultural Marketing Project (RAAMP), for Resettlement Action Plans (RAPs). The Land Use Act requires states to establish an administrative system for compensating those affected by land acquisition, while the RPF provides principles, guidelines, and criteria for preparing site-specific RAPs. Key provisions include prioritizing land-for-land compensation or cash compensation at replacement value plus a surcharge, and providing assistance for lost income and transition costs.

The Cross River State Ministry of Lands manages land administration, allocation, and acquisition through the Cross River State Right of Way Application Process and Guidelines (2024) (CR State IPB / Lands guidance)a process that involves submitting an application to the Commissioner for Lands. For acquiring land, the Ministry identifies land, negotiates with communities, and the [Office of the Surveyor General](#) surveys it.

2.1.2 [Cross River Domestic Violence and Maltreatment of Widows' Prohibition Law, 2014](#)

2.2 Cross River State has established laws and policies to combat gender-based violence, coupled with efforts to domesticate the federal [Violence Against Persons Prohibition \(VAPP\) Act, 2015](#). The state government, through agencies like the Ministry of Women Affairs, implements prevention and response strategies like sensitization campaigns, advocacy, and providing conditional cash transfers to survivors.

2.3 Federal Ministry Environment

Act 58 of 1988 established the Federal Environmental Protection Agency (FEPA) as the chief regulatory body for environmental protection in Nigeria. The Act establishing FEPA placed on it the responsibility of ensuring that all industries meet the limits prescribed in the national guidelines and standards and the associated various regulations of environmental pollution management in Nigeria (e.g., effluent limitation, management of solid hazardous waste, etc.). FMEnv may update the National Guidelines and Standards from time to time.

Relevant specific standards, discharge limits, and other environmental requirements of the FEPA guidelines (1991) and subsequent relevant directives were reviewed. The Federal Government released the Environmental Impact assessment (EIA) Act CAP E12 LFN 2004.

The Act makes the ESIA process mandatory for any major development project and prescribes the procedures for conducting and reporting the ESIA and ancillary E&S safeguards instruments like RAP, LRP, SEP, BMP, CHMP, WMP, PMP, etc.

2.4 National Regulatory Framework

The national policies and regulations have E&S implications that pertain to the project and associated RAP as presented in Table 10

Table 10: National policies and regulations and the application

Governing Documents	Description	Applicability
National Policies		
Land		
Land Use Act CAP L5 LFN, 2004	Land Use Act No. 6 was enacted in 1978 (revised in 1990 and 2004). The Act vests all land in the territory of each State (except land vested in the Federal Government or its agencies) solely in the Governor of the State, who holds such land in trust for the people and is solely responsible for the allocation of land in all areas, to individual resident in the State and to organizations for residential, agricultural, and commercial purposes.	CR-SAPZ will have to legally secure rights to the land associated with development of the project.
The National Gender Policy, 2021	The National Gender Policy, 2021 presents a set of minimum standards to meet the mandate for gender equality, good governance, accountability, and being socially responsive to the needs of vulnerable groups. The policy builds on the revision of the NGP, 2007 to respond to emerging issues across the sectors since 2006 and to incorporate current gender gaps to fulfil Nigeria's commitment to such global agenda as the SDGs. The strategic policy objectives are to bridge gender/social inclusion gaps, achieve parity in all spheres, to protect women's human rights, and mitigate sexual and gender-based violence through appropriate buffers and related services.	This RAP process has (and continues) to be undertaken to ensure effective, transparent, and timely stakeholder engagement. Moreover, it will be structured such that all stakeholder engagement activities will take into consideration in gender sensitivities, particularly when engaging with local communities. Moreover, the RAP considers gender equality in recruitment and that no employee or job applicant discriminated against on the basis of his or her gender, marital status, nationality, ethnicity, age, religion or sexual orientation.
The Agriculture Promotion Policy, 2016	The Agriculture Promotion policy builds on achievement of Agriculture Transformation Agenda (ATA), 2011-2015 and was readjusted to solve	In line with this policy, CR-SAPZ is required to abide to climate change and environmental sustainability in its

Governing Documents	Description	Applicability
	challenges faced by implementation of ATA and highlight Federal government (in partnership with State Government) priorities in the agricultural sector.	operation and participation in agricultural promotion.
General Environmental		
Criminal Code of 1990 (now CAP 38 LFN, 2004)	The Act contains the primary criminal law offences related to environmental damage, public health, and natural resources. Some environmental crimes include causing a public nuisance, fouling the water of any spring, stream, well, or reservoir of a place, and violating the atmosphere in any position to make it harmful to the health of persons.	CR-SAPZ shall be required to commit to implementing the ESMMP laid out in this ESIA and any other conditions stipulated by FMEnv.

2.5 Conventions, Protocols and Agreements

Nigeria is a signatory to several international conventions and agreements targeted toward the conservation and protection of the environment to ensure sustainable development. The relevant international conventions and regulations most applicable to the project are highlighted below in Table 11.

Table 11: List of Relevant International Conventions and Regulations

Conventions	Year Adopted	Overview
The Rio Declaration on Environment and Development	1992	<p>The Declaration was made in 1992 in Rio de Janeiro, reaffirming the declaration of the United Nations Conference on Human Environment adopted at Stockholm in 1972. The principle works towards international agreement which respects the interest of all and protects the integrity of the global environment and development. The principles of the declaration relevant to the proposed project include:</p> <p><u>Principle 4:</u> In order to achieve sustainable development, environmental protection shall constitute an integral part of the development process and cannot be considered in isolation from it.</p> <p><u>Principle 17:</u> EIA as a national instrument shall be undertaken for proposed activities that are likely to have a significant adverse impact on the environment and are subject to a decision of a competent national authority.</p>

2.6 International Best Practice Standards and Guidelines African Development Bank's Integrated Safeguards System

The AfDB provides a set of 10 Operational Safeguards of voluntary standards that present a credit risk management framework for determining, assessing and managing social and environmental risk in project financing. Table 12 presents the OS 1, OS 5, OS 8 & OS 10 which are relevant in the preparation of this RAP.

Table 12: AfDB's Operational Safeguards

Operational Safeguard	Description	Relevance to the Project
<p>Environmental and Social Operational Safeguard 1: Assessment and Management of Environmental and Social Risk and Impact</p>	<p>This OS, together with OS10 (<i>Stakeholder Engagement and Information Disclosure</i>), provide the overall process framework for the ESA and management of Bank-financed operations at the level of the project, activities or other undertakings supported through Bank financing.</p> <p>Objectives</p> <p>The objectives of OS1 are as follows:</p> <p>Identify and assess the E&S risks and impacts including those related to gender inequalities, climate change, and vulnerability of Bank lending, investment, and grant-supported operations, in their areas of influence in a manner consistent with the OSs.</p> <p>Provide opportunity for stakeholder engagement and consultation in assessing and managing the E&S risks and impacts.</p> <p>Adopt a mitigation hierarchy approach as follows:</p> <p>anticipate and avoid risks and impacts; where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels; once risks and impacts have been minimized or reduced, mitigate them; and where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.</p>	<p>The Project poses a number of E&S risks and impacts, which will need to be appropriately managed. Appropriate management measures have been included in the ESMP. Moreover, as part of the RAP process stakeholders at the State and Local Government and Community level have been consulted and engaged, and will continue being engaged during the RAP preparation and implementation.</p> <p>At this stage, CR-SAPZ have a number of environmental, social, occupational health and safety and human resource plans, policies and procedures. These plan, policies and procedures relate to all CR-SAPZ's ATC operations in Okuku. Over the life of all of CR-SAPZ's operations, the vehicle by which the commitments set out in the ESMP related to this RAP and other plans, policies and procedures</p>

Operational Safeguard	Description	Relevance to the Project
	<p>Adopt differentiated measures so that adverse impacts do not fall disproportionately on the vulnerable to prevent them from being disadvantaged in sharing development benefits and opportunities resulting from the project.</p> <ul style="list-style-type: none"> Utilize national E&S institutions, systems, laws, regulations, and procedures in the assessment, 	<p>should be developed into specific actions which can be implemented through an overarching Environmental and Social Management System (ESMS).</p>
<p>Environmental and Social Operational Safeguard 5: Land Acquisition, Restrictions on Access to Land and Land Use, and Involuntary Resettlement</p>	<p>Environmental and Social Operational Safeguard (OS) 5 recognizes that project-related land acquisition, restrictions on land access or land use, and loss of property/assets can have adverse impacts on communities and persons. Project-related land acquisition and restrictions on land use may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood), or both. The term 'involuntary resettlement' refers to both of these impacts and the processes to mitigate and compensate for them.</p> <p>Resettlement is considered involuntary when affected persons or communities do not have the right or genuine opportunity, free from coercion or intimidation, to refuse land acquisition or restrictions on land access or use that result in loss of assets or displacement.</p> <p>Physical and economic displacement, if unmitigated, may give rise to severe economic, social and environmental risks: production systems may be dismantled; people may face impoverishment if their productive resources or other income sources are lost and if there are restrictions on land use or on the enhancement of their protection; people may be relocated to environments where their productive skills are less applicable and the competition for resources greater; community institutions and social networks may be weakened; gender and other social inequalities may be exacerbated; kin groups may be dispersed; and cultural identity, traditional authority, and the potential for mutual help may be diminished or lost.</p> <p>For these reasons, involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it will be minimized, and appropriate</p>	<p>CR-SAPZ have legally secured rights to the land associated with development of the project. The securing of land and access restrictions to surrounding communities will need be in line with the requirements of OS5.</p>

Operational Safeguard	Description	Relevance to the Project
	<p>measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented. Physical investment supported by the Bank may only be carried out if the required land is not free from any encumbrances, occupation or conflict, and/or has been the subject of negotiated adequate prior compensation, and finally secured for the benefit of the project concerned.</p>	
Environmental and Social Operational Safeguard 8: Cultural Heritage	<p>The Bank recognizes that cultural heritage is an inherent and essential part of self-identification, and that it provides continuity in tangible and intangible forms between the past, present, and future. People identify with cultural heritage as a reflection and expression of their constantly evolving values, beliefs, knowledge, and traditions. It is defined as tangible and intangible resources inherited from the past that people identify, independently of ownership, as being a reflection and expression of their constantly evolving values, beliefs, knowledge, and traditions. Cultural heritage is part of every culture throughout the world. In its many manifestations, it is an integral part of people's cultural identity, practice, and self-identity, and is important as a source of valuable scientific and historical information, and as an economic and social (E&S) asset for development. Cultural heritage is also deeply connected to the surrounding environmental and natural world. Operational Standard (OS) 8 sets out measures designed to protect cultural heritage throughout the project life cycle.</p> <p>This OS sets out general provisions on the risks to and impacts on cultural heritage from project activities. OS7 sets out additional requirements for cultural heritage in the context of vulnerable groups and HVRM including indigenous peoples. OS6 recognizes the social and cultural values of biodiversity. Provisions on stakeholder engagement and information disclosure that will apply to highlight concerns about cultural heritage are set out in OS 10.</p>	<p>As part of this RAP & the ESIA process a cultural heritage impact assessment (considering both tangible and intangible forms of cultural heritage) has been undertaken.</p>
Environmental and Social Operational	In its aim to meet its primary objective of assisting African countries to attain economic development and social progress, the Bank acknowledges that the	

Operational Safeguard	Description	Relevance to the Project
<p>Safeguard 10: Stakeholder Engagement and Information Disclosure</p>	<p>right to effective participation in decision-making is essential for the development of inclusive and just societies.</p> <p>The objectives of OS10 are as follows:</p> <p>To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders, and build and maintain a constructive relationship and channels of communication with them, in particular project-affected parties.</p> <p>To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and E&S performance.</p> <p>To promote and provide the means for safe, effective, and inclusive engagement with project affected parties, inclusive of women's perspectives, in an equitable manner, and vulnerable groups, in a manner free of reprisal, throughout the project life cycle on issues that could potentially affect them.</p> <p>To enhance project benefits and mitigate harm to local communities.</p> <p>To ensure that appropriate project information on E&S risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format.</p> <p>To provide project-affected parties with accessible and inclusive means to provide input, raise issues, questions, proposals, concerns, and grievances, and allow Borrowers to respond to and manage such grievances.</p> <p>To promote development benefits and opportunities for project-affected communities, taking into account the needs of women, including vulnerable groups, in a manner that is accessible, equitable, culturally appropriate, and inclusive.</p> <p>Scope of application</p> <p>OS10 applies to all of the Bank Group's funded operations. The Borrower shall engage with</p>	

Operational Safeguard	Description	Relevance to the Project
	<p>stakeholders as an integral part of the project's ESA and project design and implementation, as outlined in OS1.</p> <p>For the purpose of this OS, 'stakeholder' refers to individuals or groups who:</p> <ul style="list-style-type: none"> are affected or are at risk of being affected by the operation, directly or indirectly (project-affected parties); and/or may have an interest in the operation (other interested parties). <p><i>The Stakeholder Engagement Plan</i></p> <p>In consultation with the Bank, the Borrower shall develop and implement a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts. A draft of the SEP will be disclosed as early as possible, and before project appraisal, and the Borrower shall seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement.</p> <p>If significant changes are made to the SEP, the Borrower shall disclose an updated SEP. This Environmental and Social Operational Safeguard (OS) therefore recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social (E&S) sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.</p> <p>Stakeholder engagement is an inclusive process conducted throughout the project life cycle. When properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for successful management of a project's E&S risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is</p>	

Operational Safeguard	Description	Relevance to the Project
	<p>an integral part of early project decisions and the assessment, management, and monitoring of the project's E&S risks and impacts.</p> <p>Requirements regarding engagement with workers are found in OS 5. Special provisions on emergency preparedness and response are covered in OS 5 and OS4. Where projects involve involuntary resettlement, vulnerable groups, high risk rural minorities (HVRM) or cultural heritage, the Borrower shall also apply the special disclosure and consultation requirements set out in OS5, OS7, and OS8.</p>	

2.7 Benchmarking of Relevant Nigerian Legislation and the AfDB's OS 5.

The primary difference between national legislation and AfDB's resettlement standards is that Nigerian law concentrates on compensation for lost assets, whereas the AfDB Safeguards have an additional focus on livelihood enhancement (or, as a minimum, restoration). Emphasis is not only on compensation for lost assets but also on assisting people to improve (or at least restore) standards of living, incomes, and livelihoods. This includes providing access to income-earning opportunities such as agricultural production or to natural resources deemed critical for subsistence.

Nigerian legislation does not provide any compensation for the value of lost land (except for reimbursement of any rent paid by the occupier during the year in which the right of occupancy was revoked). OS 5 of the AfDB stipulates that affected people are compensated for all their losses at full replacement costs before their actual move; before land and related assets are taken; and, if the project is implemented in phases, before project activities begin for each particular phase. The borrower or client gives preference to land-based resettlement strategies and as a matter of priority offers land-to-land compensation and/ or compensation-in-kind in lieu of cash compensation where feasible; further, the borrower or client clearly explains to affected people that cash compensation very often leads to rapid impoverishment.

With regard to loss of access to commonly held resources, Nigerian legislation provides that, where a right of occupancy of land owned by the community is revoked for public purposes, compensation for unexhausted improvements on the land, taking account of depreciation, may be paid to the community at the relevant governor's discretion and such payment may be to the relevant chief on behalf of the community or into a specially designated fund for the benefit of the community. OS 5 on the other hand provides for compensation to offset restrictions on access to communal resources. Assistance measures may include initiatives to enhance the productivity of the remaining resources, to which the community will continue to have access,

in-kind or cash compensation for the loss of access, or access to alternative sources of the lost resource.

The CR-SAPZ program will follow the Nigerian legislation and will also implement such additional measures as necessary to achieve outcomes that are consistent with AfDB OS 5 requirements.

Table 13 compares the AfDB Operational Safeguard 5 (OS 5) and to Nigerian legislation for those categories of displacement impacts that Project activities are expected to incur. The table also prescribed what will be adopted for CR-SAPZ program.

Table 13: Benchmarking of Nigerian Law and Principles of the AfDB on Involuntary Displacement

Category	Nigerian Legislation (Land Use Act)	AfDB OS 5	CR-SAPZ's ATC, Okuku
Minimise Land Take and Involuntary Displacement	Explore all viable alternative project design options to ensure minimisation of impacts (Land Use Act of 1978)	Project proponent to consider feasible alternative project designs, including re-siting and re-routing, to avoid or minimise physical or economic displacement.	AfDB OS 5
Consultation and Disclosure	A notice of acquisition is usually prepared by the Ministry of Lands, in conjunction with the survey description. This notice is then published in two newspapers (one national and one local and the government gazette	Open, inclusive and effective consultation with local communities is required	AfDB OS 5 and Land Use Act
Eligibility	Under Nigerian legislation, all land rights constitute occupancy rights rather than ownership rights and accordingly eligibility for compensation for loss of land is not provided for. Anyone possessing a statutory or customary right of occupancy to affected land is entitled to compensation for unexhausted improvements made to that land. Encroachers are not recognised as an eligible group, and are thus not entitled to any compensation provisions.	<p>AfDB identifies three groups of displaced people that shall be entitled to compensation or resettlement assistance for loss of land or other assets taken for project purposes:</p> <p>Those who have formal legal rights to land or other assets recognized under the laws of the country concerned.</p> <p>Those who may not have formal legal rights to land or other assets at the time of the census / asset survey but can prove that they have a claim that would be recognized under the customary laws of the country.</p> <p>Those who have no recognisable legal right or claim to the land they are occupying in the project area of influence, and who do not fall into either of the two categories described above, but are entitled to resettlement assistance in lieu of compensation for land to improve their former living standards (compensation for loss of livelihood activities, common property resources, improvements</p>	AfDB OS 5

Category	Nigerian Legislation (Land Use Act)	AfDB OS 5	CR-SAPZ's ATC, Okuku
		(structures and crops) etc.), provided that they themselves or witnesses can demonstrate that they occupied the project area of influence for a reasonable time (at least six months) prior to a cut-off date established by the borrower or client and acceptable to the Bank.	
Census and Asset Inventory	A survey to record the dimensions of the affected land parcels needs to be carried out. The enumeration process is asset driven and not household driven. There is no particular format which is currently used by the Land Department. The process mostly comprises of generic questions that are administered orally.	A census, asset inventory and comprehensive socioeconomic survey is required with gender disaggregated information.	AfDB OS 5
Livelihood	No provisions	Strategies to improve livelihoods of PAPs are required.	AfDB OS 5
Gender	No provisions	<p>Special consideration has to be paid to the needs and rights of women. In the context of gender vulnerability, the client must give careful consideration to actively facilitating consultation with both women and men in ways that are sensitive to the social and political constraints and barriers that women and men may face.</p> <p>The land-taking report (RAP or LRF/LRP) must include a specific protocol specifying safeguards for the quality and quantity of land to be allocated to women, especially widows and divorcees, to ensure their means to generate income and achieve food security.</p> <p>Specifically, applicable to resettlement, land titles at the resettlement site are to be in the name of both spouses or of single heads of household, regardless of gender, if this does not conflict</p>	AfDB OS 5

Category	Nigerian Legislation (Land Use Act)	AfDB OS 5	CR-SAPZ's ATC, Okuku
		with the borrower or client's own laws and legislation. Compensation payments to families are made to both husbands and wives when this is technically feasible and socially acceptable.	
Cut-off date	Though a cut-off date is not defined by Nigerian legislation, there is a six-week notice period given for land to be acquired by a Project. This is not, however, a formal cut-off date.	There is a requirement to establish a cut-off date for eligibility that is acceptable to project financiers/lenders. The borrower or client documents the cut-off date and disseminates information about it throughout the project area of influence in a culturally appropriate and accessible manner, before taking any action on clearing land or restricting local community access to land.	AfDB OS 5
Timing of Compensation	Once the compensation amounts have been discussed with the affected people.	Compensation is to be made before land and related assets are taken; and, if the project is implemented in phases, before project activities begin for each particular phase.	AfDB OS 5
Compensation	Cash compensation is generally made based upon government rate as well as depreciation value. Whilst in principle there is allowance for in-kind compensation or replacement of assets, cash compensation is common practice	PAPs are compensated for all their losses at reasonably negotiated cost. PAPs can be offered a range of different compensation packages, resettlement assistance, and livelihood improvement options. Engagement is key to determine the appropriate compensation packages.	AfDB OS 5
Communal resources	Section 29 sub section 3 only provides for compensation where the holder or the occupier of land entitled to compensation is a community	Page 32 of the ISS mentions compensation for the loss of communal resources.	AfDB OS 5
Livelihood Assistance	No provisions	Displaced people are provided with targeted assistance with the aim of ensuring that their standards of living, income-earning capacity, production levels and overall means of livelihood are improved beyond pre-project levels.	AfDB OS 5

Category	Nigerian Legislation (Land Use Act)	AfDB OS 5	CR-SAPZ's ATC, Okuku
Vulnerable People	Many Nigerian policies address the needs of vulnerable people, such as the Gender Policy, Child Act or NEEDS framework. However, there are no specific provisions related to physical or economic displacement.	Special attention needs to be paid to vulnerable groups and special provisions required in the livelihood restoration process.	AfDB OS 5
Grievances	Section 30 of the Land Use Act 1990 6 v: "Where there arises any dispute as to the amount of compensation calculated in accordance with the provisions of section 29, such dispute shall be referred to the appropriate Land Use and Allocation Committee."	There is a requirement to establish a culturally appropriate and accessible grievance and redress mechanism to resolve, in an impartial and timely manner, any disputes arising from the land-taking process and compensation procedures. PAPs must be informed about the mechanism.	AfDB OS 5
Monitoring	No provisions	An independent third party is required to monitor the implementation of large-scale or complicated resettlement or livelihood restoration plans, with regular feedback from PAPs. For large-scale displacement operations quarterly reviews are recommended, and in-depth reviews of 6 months progress, consistent with the overall project scheduling, are critical.	AfDB OS 5

3 The Existing Socioeconomic Environment

3.1 Social Area of Influence (SAI)

A ‘social area of influence’ consists of the people potentially impacted by a project. Affected peoples include both ‘communities of place’ and ‘communities of interest’. The location of affected people frequently does not neatly align with the geographic boundaries or the area of influence determined by the environmental impact of a project. In fact, often the buffer zones determined by technical experts are inadequate. Furthermore, downstream water users are often not considered in assessment of impacted peoples. It is worth noting that social impacts do not necessarily decrease in intensity with distance from the project site. People are connected by a vast array of linkages and networks. Projects also can often have a wide logistics corridor and complex value chains (with backwards and forwards linkages). Defining a ‘social area of influence’ does not necessarily require the articulation of a geographic boundary. Instead, the social extent of the project can be determined through a combination of stakeholder analysis and social mapping, and through an iterative process of understanding the social, economic, political and environmental changes induced by the project and the livelihoods and networks of potentially impacted people (Vanclay et.al 2015)

Ipuole Okuku the direct host community to the project have been identified as being directly affected by the proposed project. The average distance of human settlements to perimeter fence of the proposed project site is, while the project site covers 37.8 hectares of land. Land use within 5 km² radius of the ATC project site is within Ipuole Okuku community. This community, together with the physical footprint of the project will hereafter be referred to as the “**Area of Influence**” or “**Host Community**” for the ATC project. However, the social area of influence for the project extends beyond the above boundary.

3.2 Objectives of the Socioeconomic Baseline Data Acquisition

The SIA serves the following overarching purposes:

- To assess how the ATC project is likely to affect the people, institutions, and social networks in Okuku and nearby communities.
- To provide evidence-based guidance for designing and implementing measures that will enhance the project's social sustainability and acceptability.
- To ensure that the voices of affected stakeholders—including women, youth, farmers, traditional leaders, and vulnerable groups—are incorporated into the planning and execution of the project.
- To develop a robust Social Management Plan (SMP) that aligns with national laws and international best practices.

3.3 Scope of the SIA

The scope of the SIA covers:

- A baseline study of the social and economic characteristics of the project area.
- Identification and assessment of potential social impacts throughout the project lifecycle (pre-construction, construction, operation, and decommissioning).

- Engagement and consultation with key stakeholders using participatory and inclusive tools.
- Development of practical mitigation, enhancement, and monitoring strategies to address identified impacts.

Methodology

The SIA employed a mixed-methods approach combining qualitative and quantitative tools to ensure a comprehensive and participatory analysis. Key steps included:

- **Desk Review:** Analysis of existing policy documents, project reports, and socio-economic data relevant to Okuku and Yala LGA.
- **Primary Data Collection:** Household surveys using structured household questionnaire developed using KoboToolbox, a mobile-based data entry software and pre-tested, Focus Group Discussions (FGDs), Key Informant Interviews (KII) and Participatory Rural Appraisal (PRA) and participatory mapping to gather detailed local-level information.
- Target Population
- The target population for the study were residents and stakeholders of the community directly affected by the project – Ipuole Okuku in Okuku Clan, Yala LGA, Cross River State.

Sampling Method

Stratified random sampling was used for household surveys, while purposive sampling methodology was employed for Focused Group Discussion (FGDs) and Key Informant Interviews (KII).

Sample Size:

A total of 100 households across the project community were surveyed.

Initial consultation and sensitization meetings were held with the LGA chairman, Councillors, deputy village head, chiefs and traditional leaders of the community at the Sanctus Hotels, Ipuole Okuku

3.3.1.1 Household Surveys and Data Collection Tool

A structured questionnaire was administered to a representative sample of 100 Heads of Households (HH) across the target communities, using KoboToolbox. The respondents were heads of households or their representatives and adults above 18 years of age. Information gathered included household composition, income sources, education, health, housing, food security, land use, access to services, concerns and expectations from the proposed project.

3.3.1.2 Focus Group Discussions (FGDs)

FGDs were held with elders, women, and youth leaders and fisherfolks in the communities. Discussions explored perceptions of the ATC, socio-cultural norms, impact history, conflict resolution mechanisms, concerns and expectations from the project.

3.3.1.3 Key Informant Interviews (KII)

KIIs were conducted with individuals including community leaders, women leaders, youth representatives, school heads, fisherfolks and farmers. Focus areas for the KII included community development priorities, historical grievances, land tenure systems, gender relations, impact history, concerns and expectations from the project etc.

3.3.1.4 Observational Assessments

Field teams carried out community walk with representatives of the communities to assess and record infrastructure conditions (roads, schools, health centres), water sources, waste disposal methods, and community layout. Photographs of these facilities were also taken and recorded.

3.3.1.5 Scoping and Stakeholder Engagement Workshop

A scoping and stakeholder workshop involving relevant stakeholders was convened to present the project to relevant stakeholders and to receive their inputs into the design and implementation of the project to ensure a win-win outcome for all

3.3.1.6 Data Collation and Analysis

Data obtained from all the sources above were analyzed and interpreted for the report writing.

3.3.1.7 Data Analytical Techniques and Data Presentation

Summary statistics including percentages, averages and ratios were used in the report and data presentation was done in tables and charts. Labour force population covers all persons aged 15-64years who are willing and able to work regardless of whether they have a job or not (Annual Abstract of Statistics, Vol. 1, 2016). Population sizes and relevant distributions were determined using the following formulae:

I. Population projection using the exponential model

$$P_n = P_o (1 + r)^n$$

where P_o is population in the base year, r is estimated annual growth rate of population, and n is time lapse in years.

II. Sex Ratio = Number of males \times 100

Number of females

III. Dependency Ratio = Population aged 0-14years + 65years and above \times 100

Population aged 15-64years

- **Stakeholder Analysis and Mapping:** Identification of project-affected persons (PAPs) and institutions with varying levels of influence and interest.
- **Impact Assessment Framework:** Rating and categorizing impacts using significance, reversibility, and duration criteria.

3.4 Background of the Study Area - Yala LGA

Historical and Geographical Background

Yala LGA was formerly a part of the old Ogoja Division of Cross River State, but became a full-fledged LGA on 27 August 1989. It is now part of Cross River State's Northern Senatorial District, with headquarters in Okpoma. Yala has an area of 1,739 km². It is bordered by Benue and Ebonyi States to the north/west, and Cross River LGAs (Obubra, Ikom, Ogoja, Bekwarra) on east and south.

Political and Governance Structures

The political system in Yala LGA follows the Nigerian local government framework, which is democratic and tiered under the 1999 Constitution (as amended). It consists of elected and appointed officials responsible for lawmaking, executive functions, and community representation. Local governments in Nigeria have the executive and legislative arms. The Executive arm is headed by the Executive Chairman supported by Supervisory Councillors appointed by the Executive Chairman. The legislative arm is made up of elected councillors from all the wards in the LGA. Yala LGA is made up of 10 wards namely Okuku, Okpoma, Ekajuk I/II, Mbube I/II, Nkum Ibor, Nkum Irede, Urban I/II. The current Executive Chairman is Dr. Fred Okem. The tenure of the elected officers is 3 years.

History, Governance and Administrative Structures

History of Okuku Clan and Ipuole Village

Okuku is a long-standing community inhabited by the people of Yala tribe. Okuku is a clan, while Ipuole Okuku is a village within Okuku clan. The Okuku people celebrated their 300-year anniversary in 2007 dating the origin of the community back to 1707. The Okuku people migrated from Kwarafa region in present day Taraba state and then moved to Idoma Basin valley in present day Benue State. Finally, they migrated to and settled down in Okuku land in Yala LGA of Cross River State. They speak Yala language.

Leadership and Governance in Okuku Land

Okuku is ruled based on kingdoms and chiefdoms. There are 17 villages in Okuku clan with the headquarters in Ipuole Okuku. The overall King of Okuku clan is called His Royal Highness Ogamode of Okuku. Each village has a village head. The immediate past Ogamode was ostracised and dethroned about 2 years ago. The current Ogamode's name is Adamoglagu and has been on the throne for about 2 years now. The palace of the king is built by the community and every adult male in the village will cut a living stick to plant at a site and this establishes the site as the ground for the king's palace and the acceptance and support of the new king. To dethrone the King (Ogamode), the people will also go and breakdown the fence or cut down the living fence of the palace as a sign of rejection of the king and loss of the support and allegiance of the people. Okuku community is 100% patrilineal and a woman cannot become a chief, but can only be appointed as a woman leader in the community.

Governance and Administrative Structure in Ipuole Okuku

The governance structure and hierarchy in Ipuole Okuku is made up of the following in that order:

1. The Ogamode (Clan/Village head)
2. Adamoglagu (2nd in command)
3. Ogbuole (Custodian of the king)
4. Oduma (The King's Barber)
5. Adamede (Information minister)
6. Oduole Ogrinya (Chief of Defence staff)

The above make up the village council with Ogamode as the head of the council. They appoint other people to work with them example secretary, treasurer etc. They can also setup committees e.g., lands allocation to work and report back to them. There is age grade system in the community with interval of 5 years between age grades. The 16-age grade supports community development and serve as the community watch dog. There is also the Youth council – Ipuole Okuku youth council but there is no women council in the community. Women issues are resolved by the youth council and elders.

Role of the Youths in the Community

The youths are made up of males and females in their 20s and 30s and they are traditionally responsible for ensuring internal and external security, enforcing and maintaining law and order, and mobilization for community sanitation. They exert their influence and play their roles through their youth organization – Ipuole Okuku youth council.

Role of Women in the Communities

Traditionally, the communities recognize important roles played by women in the family and society, including supportive roles in traditional administration, social mobilization, and initiation and ownership of developmental projects and programmes. They are also important in attending to welfare needs and conflict management, especially as this concern their members. The women contribute to household income as they work and invest in livelihood activities. They are key in the upbringing of children and community development. Ipuole Okuku is strictly a patrilineal society governed and administrated by men only. As a result, a woman cannot be a chief and there is no women council in the community. A woman can only be appointed as a woman leader. Women issues are resolved by the youth council and elders.

Social Organizations and Support Systems

3.4.1.1 Social Structure and Organization in Ipuole Okuku

Social institutions across the communities comprise families (nuclear and extended) and Community Based Organizations (CBOs). Nuclear and extended families are very basic and important in each of the communities; they confer social identity. Traditionally, nuclear families are single units with a father as the head while each extended family comprises several nuclear families that identify with a common ancestor who would have lived several generations in the past. The extended family is always headed by a male. Every indigenous resident would traditionally identify with a nuclear and an extended family in the community of residence. The community operates an age grade social organizational system which is one of the major CBOs in the community. The CBOs play specific roles and while membership of

some is exclusive, membership of some others is not. For instance, the Women's Groups are exclusive to women either born or married into the community, while the Youth Groups are unisex. There are unisex social groups with membership from indigenous and non-indigenous residents.

3.4.1.2 Socio-Cultural Organisations in Ipuole Okuku Village

Ipuole Okuku operates an age grade system for the community's socio-cultural organisation and administration. There are many age grades for both men and women in the community and come with different names. They perform different social functions for the support and development of their members and the community at large. They serve as social safety nets for their members. These age grades include the following:

1. Peace age grade
2. Emoma
3. Ebimugu
4. Odidoma
5. Ayigamode
6. Odumode
7. Ogbodu
8. Nepa
9. Election
10. Udoji
11. Naira
12. Apollo
13. Jet
14. Elouka
15. Ghana
16. Eminyor
17. Kolta
18. Cinema

Other social organizations in the community apart from the age grades are – Yala Progressive Union (YPU), Women of Likeminds (Oyimotu) for women etc.

Cultural Groups and Cultural Festivals Ipuole Okuku village

There are many cultural societies and groups with their various functions and cultural activities in Ipuole Okuku village namely:

3.4.1.3 Cultural groups

1. Akataka dance for both men and women
2. Ekpatuma dance group
3. Worhi dance group for both men and women
4. Ogene dance group
5. Ayita dance group
6. Abakpa dance group

7. Ogrinya dance group
8. Worcha dance group

The Ogrinya dance group is restricted to members only who have been initiated into the group. Non members are not permitted to come out when Ogrinya group comes out to display.

3.4.1.4 Festivals in the Community

The major cultural festival in the community is the Yala LGA wide New Yam Festival held every 31st day of August every year.

Ethnic Composition of the Study Area

The communities have a combination of indigenous and non-indigenous residents. Indigenous residents are the Yalas who form the dominant population of the area. There are other residents from various ethnic groups residing in Bekwara, Yache, Igede, Obudu, Efiks, Annangs, Ibibios, Ibos, Yorubas, Hausas among others. The communities do not have any known socio-cultural practices that limit or forbid interactions between residents of different ethnic backgrounds and religious orientations. Ethnic and religious tensions between community members and workers on the proposed project are therefore not expected.

Cultural Heritage

Cultural heritage and resources encompass the tangible and intangible assets of a society or culture that are preserved and passed down through generations. These include physical artifacts like buildings and monuments, as well as intangible elements like traditions, knowledge, and languages. They represent a society's history, identity, and values, and are important for understanding and preserving cultural continuity.

The cultural heritage of the study communities is linked to language, dress and food, festivals and dances. The communities have various similarities in the way they dress, foods they eat and ways they conduct their marriages. Indigenous languages spoken in the communities are some of their cultural heritages. Among all the communities, land is considered a major socio-cultural asset and a heritage that must be bequeathed to succeeding generations. The communities have deities, shrines and sacred places which they have maintained. These deities, shrines, sacred places and traditional worship are important aspects of the people's cultural heritage. The proposed project is not expected to impact any cultural heritage sites in the community including shrines, grooves, graves and community play grounds where cultural activities are staged as the project site is currently used for farming.

Language and Communication

Yala is the dominant native language spoken in the village. Other indigenous languages spoken in area are Bekwara, Yache, Igede, Obudu, Efik, Annang, Ibibio, Igbo, Yoruba, Hausa etc. Apart from the indigenous languages, more than 50% of residents are able to communicate in English language and Pidgin English.

Gender Issues

Women in Nigeria generally have not had equal access to education, communal decision making, investments and work opportunities with men. There is no constitutional provision

barring them, but there are several socio-cultural practices in different communities that do not afford women as much opportunities as men. Their primary role in traditional administration is advisory. Women are also not entrusted with management of family lands which are major socio-cultural assets in the communities. These are cultural inhibitions and indications of gender bias and inequality. It has been noted that socio-cultural and economic factors including lack of funds, lack of interaction with women focused development agencies; domestic violence and cultural discrimination are factors that inhibit women from undertaking certain tasks which have resulted in women performing less than their abilities. Ipuole village is a patrilineal society and strictly deny women opportunities in the leadership, administration and decision-making in the community.

In terms of Gender Based Violence (GBV), no cases or very few were recorded. There is an unwritten rule in the village that after 6pm you cannot beat your wife and you cannot beat your wife in the bush. This rule has gone a long way to prevent and control GBV in the community. Such cases when experienced or reported, are seriously frowned at by the Council of Chiefs and the Clan Council. Perpetrators are usually seriously dealt with and reported to security agencies

Taboos/Norms

Social norms are generally considered as a socio-cultural phenomenon affiliated with beliefs, values, custom, and hierarchical power. The culture of the project area like a typical African society prohibits stealing, incest, adultery, rape, homosexuality, killing, illegal possession of firearm, farmland and other properties, etc.

Dispute Resolution

Family disputes are resolved by the family head which is the father of the house; youth disputes are settled by the youth leader, and women disputes by the women leader. In instances where these disputes cannot be settled by these various leaders, the case is always forwarded to the community head, who will then sit with his cabinet members to resolve the case. In situations where the family heads are unable to resolve the dispute, they forward the case to the village Head. Where the matter is not still resolved at his level, it is taken to the council of chiefs and finally to the clan council if the council of chiefs cannot handle the case satisfactorily.

Marriage and Family

The marriage institution is revered. Marriages are contracted between adult males and adult females. There are no known instances of same sex marriages within the area. Monogamy is mainly practiced. The family is a very important social unit in the community and the concepts of nuclear and extended families exist. The typical nuclear family is headed by a father with other members including the mother and the children. The extended family includes members who share common ancestors. Marriage before the age of 20 is common especially for the female gender. Marriage payments/dowries are made to the prospective bride's parents. The marriage payment is shared among the bride's kin, with the father keeping the largest share. The marriage payment traditionally had to be completed before the marriage could be consummated.

Sexual Orientation

The LGBTQ population in Nigeria exists within a challenging legal and socio-cultural environment. The **Same-Sex Marriage (Prohibition) Act (2013)** criminalizes same-sex unions and restricts the public expression and organization of LGBTQ individuals. Violations of this law can attract prison terms of up to 14 years. These legal frameworks are reinforced by prevailing religious and cultural norms, particularly in Cross River State, where traditional beliefs and Christian doctrines dominate. As a result, many LGBTQ persons in the study community and surrounding areas may remain invisible or closeted due to fear of discrimination, persecution, or violence. This legal and societal context limits their ability to participate openly in consultations or benefit equitably from development initiatives.

Potential Project Impacts on LGBTQs

Although the LGBTQ population may not be explicitly visible in the project area, the project may indirectly affect their well-being in several ways:

- Employment and Workplace Discrimination: LGBTQ persons may face prejudice in hiring or treatment by employers, contractors, or co-workers, especially if their identity is perceived or disclosed.
- Access to Project Benefits: LGBTQ individuals may be excluded from skills training, compensation, and social programs due to stigma or biases from implementing agencies or community gatekeepers.
- Exposure to Harmful Social Dynamics: The arrival of external workers or cultural influences may provoke community backlash, particularly if perceived as a threat to traditional values.

3.4.1.5 Mitigation and Inclusion Strategies

To safeguard the rights and dignity of all vulnerable persons, including those identifying as LGBTQ, the following strategies are recommended:

3.4.1.6 Non-Discrimination Policies

The project should incorporate a non-discrimination clause in all Human Resources policies for contractors and partners. This should explicitly prohibit discrimination based on sexual orientation, gender identity, or expression, in line with AfDB's Operational Safeguards and UN Guiding Principles on Business and Human Rights.

3.4.1.7 Confidential and Safe Grievance Mechanism

The grievance redress mechanism (GRM) should allow anonymous reporting and ensure privacy to protect LGBTQ persons and others at risk of social reprisal.

3.4.1.8 Inclusive Communication and Training

Training for project staff, security personnel, and contractors should include modules on human rights, respect for diversity, and prevention of workplace harassment and abuse.

3.4.1.9 Access to Services Without Discrimination

Any community benefits such as health services, microenterprise support, or social investments should be accessible to all residents, regardless of perceived identity.

3.4.1.10 Monitoring and Safeguards

The project's monitoring and evaluation (M&E) framework should track inclusion indicators and flag any reports of exclusion or abuse, including against hidden or vulnerable groups.

3.4.1.11 Limitations and Ethical Considerations

Given the socio-legal context in Nigeria, it is neither ethical nor safe to require the identification or public participation of LGBTQ persons in SIA consultations. Instead, the approach relies on general principles of human rights, anonymity, and safe inclusion practices based on global standards.

The law in Nigeria does not recognize LGBTQ and for this reason there are no provisions for such persons. Homosexuality is illegal by the laws of Nigeria and is punishable by up to 14 years imprisonment (Same Sex Marriage Prohibition Act 2013). Culturally, the communities do not accommodate any sexual orientation and marriage practice other than that of adults who are males by birth marrying adults who are females by birth. None were identified as LGBTQ during stakeholder engagements. It is doubtful if any would want to identify as LGBTQ because of the social stigma it is likely to attract in the study communities.

3.5 Religious Practices and Belief Systems

Among residents of the study community are those who identify as Christians, worshippers of traditional deities and Muslims. Christianity is the major religious belief of 99% of the people in the community and there are many Christian worship centres of various denominations in the community viz: Qua Iboe church, Assemblies of God, Sure Foundation, Faith Tabernacle, Mount Zion Lighthouse, Mount Horeb, Faith and Works etc (Plate 1). There are no known communal restrictions on religious beliefs and practice. Residents are at liberty to pursue their religious interests.



The Apostolic Church, Ipuole Okuku

St. Joseph's Catholic Church, Ipuole Okuku

Plate 1: Showing Different Church Denominations in Ipuole Village

Archaeological Heritage and Resources

Archaeological heritage and resources encompass the material remains of past human activity, including sites, objects, and landscapes that hold historical, cultural, and scientific significance.

These resources provide valuable insights into the lives, cultures, and histories of past societies. In Ipuole Okuku village, the people did not report of the existence of any known archeological artefacts or sites in the village. However, they reported of the existence of shrines and sacred groves such as Unuoji sacred grove – a burial ground for chiefs and Ublecho shrine which is at the boundary of the 2 communities - Ugaga and Okuku community. Ublecho is reported to be controlling deity of Ipuole village.

Social vices

Consumption of spirits and alcoholic beverages including beers, local gin and palm wine, at cultural and social functions and in private entertainment is common among male and female adult residents. The communities have shops and drinking bars that sell alcoholic beverages without age restrictions. In addition, some residents take concoctions of roots, barks and leaves of plants and trees soaked in local gin (kaikai, ogogoro) for their perceived medicinal value. The elders of the village reported that there were no incidences of armed robbery, drug abuse, alcoholism, rape in the village and that the community does not accept these vices. They indicated that there are no written policies or regulations on these, but unwritten, known and understood by all. There is very severe punishment for anyone who breaks this unwritten law. Such a person will be ostracized from the community.

3.6 Demographic Characteristics of the Study Area

Population Size of the Study Area

Nigeria has conducted five national censuses between 1952/53 and 2006. The results from four of the censuses including 2006 were accepted and published. Following 2006 national census, the National Population Commission (NPC), published population figures at national, state and local government levels and did not publish figures of individual communities in the LGAs.

Population Growth

Demographic processes of fertility, mortality and migration determine population growth, and following their interplay the NPC had estimated the annual population growth rate across Nigeria at 2.5% (NPC 2022)

Fertility Rate:

Total Fertility Rate (TFR) refers to the average number of children that would be born alive to a woman (or a group of women) during her lifetime if she were to pass through all her childbearing years conforming to the age-specific fertility rates of a given year. The average number of children a woman would have by the end of her childbearing years if she bore children at the current age-specific fertility rates. If fertility were to remain constant at current levels, a woman in Nigeria would bear an average of 4.8 children in her lifetime. Fertility is much higher in rural areas than in urban areas. On average, women in rural areas give birth to 5.6 children over their lifetime, while urban women give birth to 3.9 children in their lifetime. The TFR in Nigeria has declined consistently over time, from 6.3 children per woman in the 2008 NDHS to 4.8 children per woman in the 2023–24 NDHS, (FMoHSW, NPC, IFC et al, 2024). The Total Fertility Rate (TFR) for Cross River State was 3.26 in 2022 ((NBS

Demographic Statistics Bulletin 2022). This shows a steady decline from 4.74 in 2015 to 3.26 in 2022.

Migration

Migration is induced by socioeconomics, environmental and political factors, and it impacts various development areas at the macro and micro levels (Annual Abstract of Statistics Vol. 1, 2016). The general migration pattern in Nigeria is a rural to urban movement of the population. The study area, Ipuole Okuku being the host community to the ATC will attract many migrants seeking work in the ATC.

Life expectancy at birth is an indication of the number of years an average member of the population would live, at the time of their birth. The World Health Organization (W.H.O.) estimates life expectancy at birth in Nigeria for males at 61 years and 64 years for females (W.H.O. Nigeria Country Profile, 2021). This is a significant improvement over 2016 estimates which were 53 years for males and 55 years for females. The 2016 report had indicated that the probability of dying between 15 years and 60 years was 372 per 1000 for males and 333 per 1000 for females (W.H.O. Nigeria Country Profile, 2016). The National Population Commission (NPC) (2022) data shows that life expectancy at birth in Nigeria increased from 2006 to 2022, with both males and females experiencing an increase. Specifically, male life expectancy at birth grew from 48.9 years in 2006 to 55.1 years in 2022, while female life expectancy increased from 50.58 years in 2006 to 57.2 years in 2022. The National Population Commission (NPC) male and female life expectancy at birth projection for Cross River State for year 2022 are 59.6 for males and 65.4 for females. (NPC, 2022). Females have historically had a higher life expectancy at birth than males in Nigeria.

The proposed project is expected to impact population growth in the study communities because of influx of project workers job seekers and new businesses that would seek to tap into the opportunities created by the project.

Table 14; Projected Populations of Yala LGA, 2025 - 2028.

Community/LGA	Year/Population (Census Figures and Projections)				
	2006 census	2025	2026	2027	2028
Yala LGA	211,557	345,620	354,599	363,766	373,127

Source: NPC Priority Table Vol. IV, 2010 and PGM Projections, 2025.

Table 14 shows population projections for Yala LGA for 2025 – 2028, while

Table 15 highlights the demographic projections in 2025. These projections were made using average annual growth rate for Cross River rural areas (2.4–2.8%), and midline growth of 2.6% over 19 years for 2025 using the NPC base year 2006 census figure of 211,557 for Yala LGA.

Table 15: Projected Demographics for Yala LGA and Ipuole Okuku Village (2025)

Age Group	Population	Percentage
0-14	146,389	42.5%
15-64	185,241	53.6%
65+	13,990	3.9%
Total	345,620	

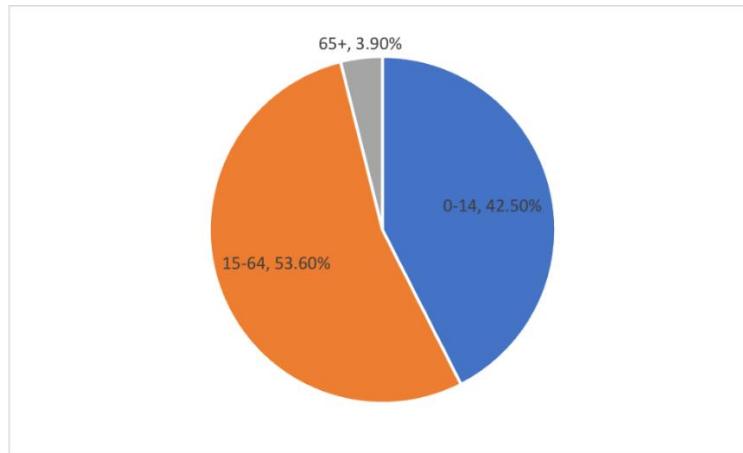


Figure 8: Projected Demographics for Yala LGA and Ipuole Okuku Village (2025)

Source: PGM's Projection (2025)

Figure 8 shows that **Children (0–14)** make up **42.5%** (4 in 10) of the population, reflecting a **young population structure**, the **working-age population (15–64)** make up **53.6%** is the majority, suggesting a potential for economic productivity — if employment and educational opportunities are available, while the **Elderly (65+)** form a small segment **3.9%**, indicating a relatively **low aging burden** for now. This distribution is an indication of a high **youth dependency burden** and the need for investment in education, child health, and job creation in the LGA.

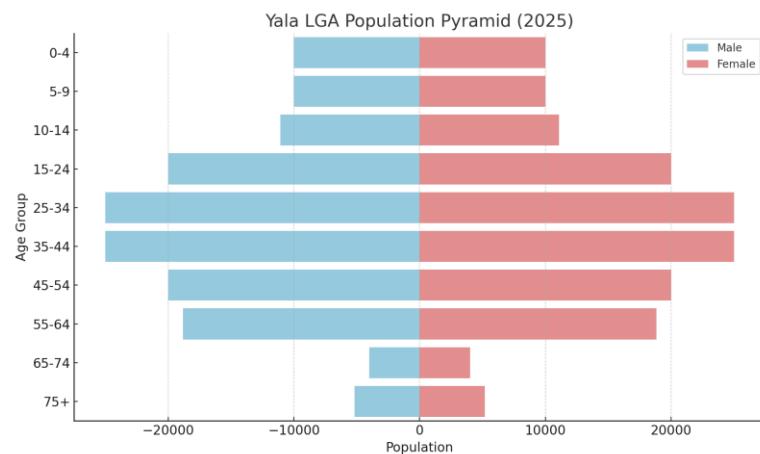


Figure 9: Population Pyramid for Yala LGA (2025 projection)

Source: PGM's Projection (2025)

Figure 9 shows the population pyramid for Yala LGA. The population pyramid presents a gendered age structure using synthetic male/female splits. Each bar shows the number of people in an age cohort, separated by sex. The structure shows:

- **A wide base** for the (0–14 age groups): this indicates high birth rates and youthful population — a classic feature of rural areas in Nigeria and developing regions. The high proportion of children implies future population growth even if fertility rates decline. The large youth base points to rising demand for schools, teachers, child services, maternal, child, and adolescent health programmes.
- **A gradual narrowing for the Middle Ages (15–44 age group)** which suggests a steady but moderate growth in working-age adults and possible high youth unemployment if job opportunities are scarce. This indicates the urgent need for economic diversification and skill-based training
- **Small elderly segment (65+)**: The top of the pyramid is narrow, showing **low life expectancy** or a younger population.

Table 16: Age Distribution projections for Ipuole Okuku Village for 2025

Age Group	Population	Percentage
0-14	1,761	42.5%
15-64	2,222	53.6%
65+	162	3.9%

Table 16 showing the age distribution projections for Ipuole Okuku Village for 2025. Total Population: **4,147** (Estimated at **1.2%** of Yala LGA population)

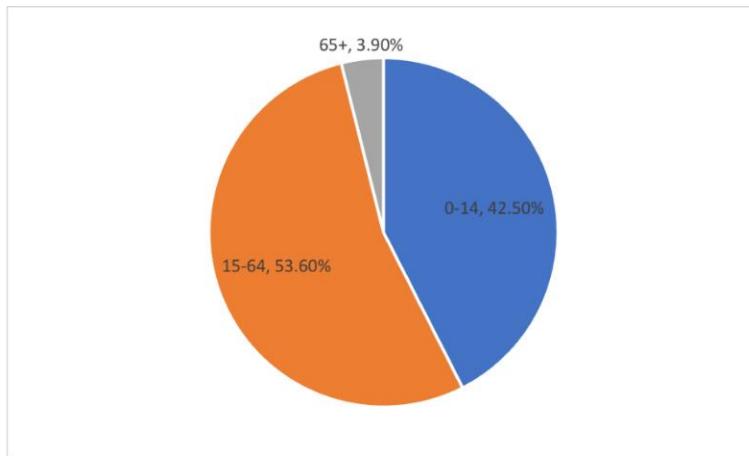


Figure 10: Projected age group distribution for 2025 in Ipuole Okuku village.

Source: PGM's Projection (2025)

The chart Figure 10 shows that the youth population (0–14) comprises 42.5% (nearly 2 out of every 5 people), indicating high birth rates and a youthful community, the working-age group (15–64) makes up the bulk (53.6%) of the population, suggesting potential for labor-driven development, while the elderly (65+) form a very small fraction (3.9%) of the population, which is typical for rural Nigerian communities with lower life expectancy. This pattern aligns closely with rural demographics in Sub-Saharan Africa youthful, dependent, and under pressure to transition into a more productive age structure.

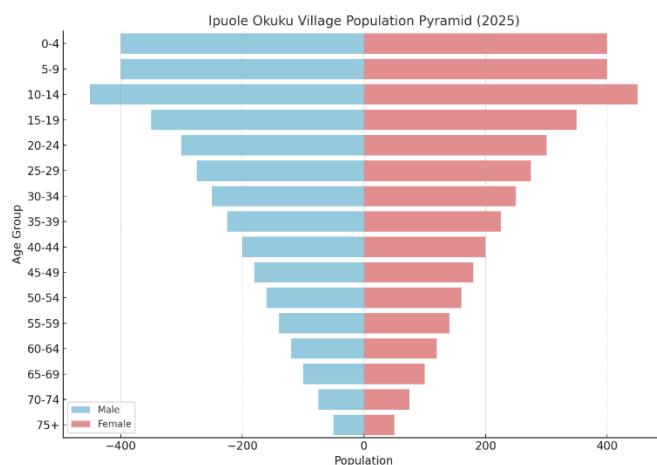


Figure 11: Population Pyramid of Ipuole Okuku Village (Based on 2025 population projection)

Source: PGM's Projection (2025)

Figure 11 shows the population pyramid of Ipuole Okuku village based on 2025 population projection for the village. A visual analysis of the pyramid shows a Wide base for the (0–14 age group) and this reflects a high fertility rate, typical of rural agrarian societies; a moderate bulge in young adults (15–34) which suggests a growing segment of economically active youth, many likely to be engaged in farming, informal work, or preparing to migrate to urban areas for opportunities, a gradual tapering for the (35-64) age bracket, which indicates

declining numbers in older age brackets due to limited access to healthcare and aging support systems. Narrow top of (65+) age group – (smaller elderly population). This is indicative of **limited** life expectancy and minimal aging burden at the present. The structure also shows near-equal gender distribution, no major gender imbalances, indicating relatively stable gender demographics.

The Ipuole Okuku population pyramid is broad-based, characteristic of a young and growing rural community. If well-managed, the large working-age population can become a demographic dividend rather than a burden. Strategic investment in human capital (education, health, jobs) will be essential to unlocking that potential.

Dependency Ratio

The dependency ratio is a demographic measure that compares the population of dependents (those not in the labor force) - children (0–14) and the elderly (65+) to the working-age (15–64) population. It reflects the economic burden on the productive population. Projection based on NPC 2006 census figure of 211,557 and 2.6% annual growth rate for Yala LGA and 1.2% of Yala LGA population for Ipuole Okuku village population.

Table 17: 2025 Projected Dependency Ratio for Yala LGA and Ipuole Okuku Village

Area	Total Population (2025)	0–14 Years (%)	15–64 Years (%)	65+ Years (%)	Dependency Ratio
Yala LGA	345,620	42.5% (146,389)	53.6% (185,241)	3.9% (13,990)	86.5
Ipuole Okuku Village	4,147	42.5% (1,761)	53.6% (2,222)	3.9% (162)	86.3

Source: PGM Projection (2025)

Table 17 presents the calculated dependency ratios for Yala LGA and Ipuole Okuku Village based on 2025 projected population data of Yala LGA. The dependency ratio measures the number of dependents (children under 15 and adults over 64) per 100 working-age individuals (15–64 years), providing insight into the socio-economic burden on the productive population. The table shows a dependency ratio of Yala LGA **86.5**: 86.3 for Ipuole Okuku village. This means that for every 100 working-age people, there are 86 dependents in the LGA and 86 dependents in Ipuole Okuku village. This means every household with 2 working adults is likely supporting nearly 2 dependents. This indicates a moderately high burden typical of rural Nigerian LGAs. The higher ratios imply that more resources are committed to the care of children and the elderly in households in the LGA and communities. Youthful populations have reduced labour input and income per capita and high dependency ratios. These are characteristic of underdeveloped economies (UNDP, 2006).

Implications of the high dependency Ratio

High youth dependency:

This indicates a strong need for expanded education services (teachers, facilities, materials), primary healthcare access (especially maternal and child) and food and nutrition programs.

Modest elderly population:

This suggests that elderly support though not yet burdensome, the support systems should be proactive with future planning for health insurance, elderly support, and pensions.

Labour force support:

High ratio suggests adult workforce must be **economically productive** and the need for job creation in agriculture, informal trade and apprenticeships.

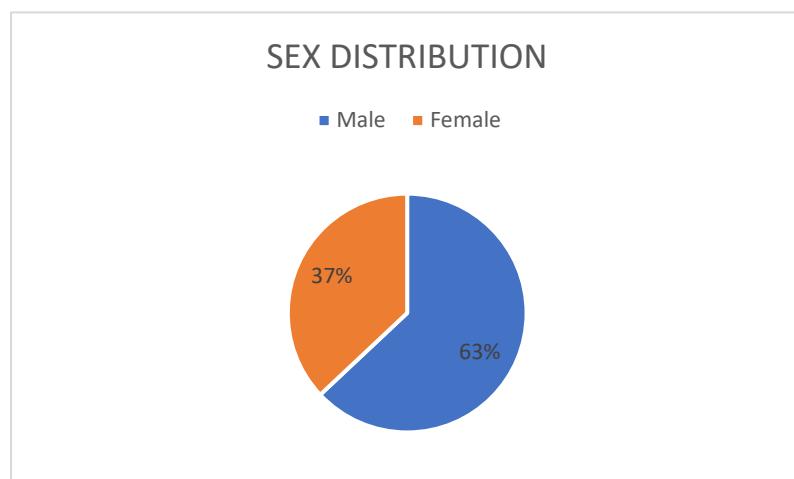


Figure 12: Sex Distribution of Respondents in the Study Community

Source: PGM Survey 2025

The result of the survey (Figure 12) shows that 63% of the respondents were males and 37% were females. This is in contrast to what obtains in many rural communities in south-south region of Nigeria where female populations are always higher than that of males. This may be attributed to the apparently low level of awareness creation and mobilization by the community before the survey, coupled with the fact that this is a farming season when women are actively engaged in farming activities. Again, this result does not corroborate with the submissions of the community leaders during focused group discussions that there were more females than males (males – 40% and females – 60%) in the community. The higher ratio of women to men may be indicative of both family harmony and gender inclusiveness in the study area

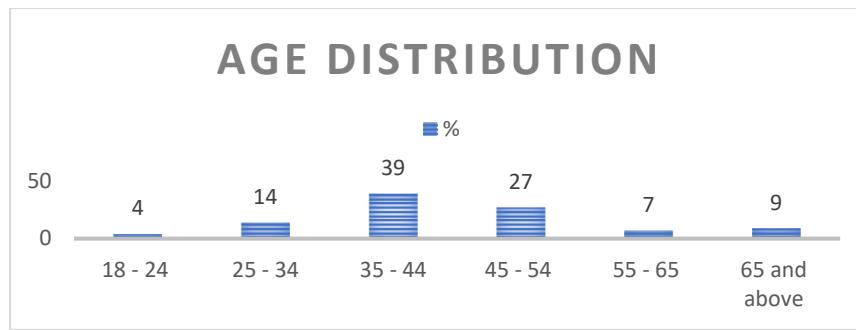


Figure 13: Age Distribution of Respondents in the Study Community

The survey (Figure 13) shows that 4% of the respondents were between the 18-24 age bracket, 14 % between 25 – 34, 39% between 35–44, 27% between 45–54, 7% between 55 – 64, while 9% were in the 65 and above age brackets. The preponderance of the 25-54 age bracket in the survey result is an indication of the active workforce available in the community. It is expected that a sustainable, job creating, inclusive and profitable ATC business development system and environment will create job opportunities that will employ this large labour force available in the community and stem the tide of rural – urban migration of the youths from the area.

Marital Status

Marriage is a revered institution among residents across the study area. It has been noted that the marital status of an individual is a very important indicator of social responsibility, trust and achievement in Nigeria (Akpogomeh O. S. and Atemie J. D., 2002). Many couples would rather endure their marriages than be separated or divorced because of the importance attached to marital status. Marriages are usually celebrated with merry making and exchange of gifts between families of the bride and groom. They involve family members and friends of the couple and processes including negotiation of a bride price by elders from both families. Marriages in the two communities are monogamous. Marriages in the community are mostly contracted under Customary Law and Ordinance. It is usually between adult males and adult females. There are no known communal restrictions on marriage on the basis of religion, culture, social status or ethnicity. The proposed project is not expected to impact the marriage institution in the study community.

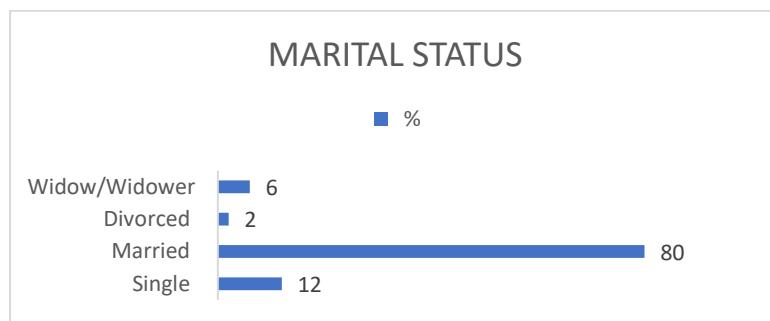


Figure 14: Marital Status of Respondents in the Project Community
Source: PGM Survey 2025

From figure 4.44, 80% of the respondents are married, 12% are singles, 2% are divorced, while 6% are widows/widowers. A stable marriage indicates the level of responsibility and stability of a family and by extension communities.

Household Composition, Structure and Size

Households live together, share same source of food and recognize themselves as a social unit under the authority of a head. Although visitors are excluded, members are not necessarily related biologically. Household size refers to the number of persons in a household which in Nigeria ranges from one to 25, (NPC Priority Table Vol. IX, 2010). The average household in the study area headed by the father and members include his wife, children and wards. The wards include domestic staff (house helps).

Table 18: Household Sizes in the Project Community

No. of Persons in Household	% of Households
2	5
3	11
4	24
5 & above	60

Source: PGM Survey 2025

Table 18 shows the household sizes in the project community. As can be seen from the Table, 60% of the households have a household size of 5 and above persons, while 24%, 11% and 5% have household sizes of 4, 3, and 2 persons respectively. Analysis of the data gives an average family size of 5 persons per household in the project community.

Educational Characteristics of the Study Community

Figure 15 shows the educational distribution of the respondents in the project community. From the figure above, 20% of the respondents have attained primary level of education, 55% of the population have attained secondary level of education, 16% have attained tertiary level of education, while 9% have had vocational education in Ipuole Okuku village. The high level of educational attainment (over 60% secondary and tertiary combined) indicates availability of literate labour force in the community.

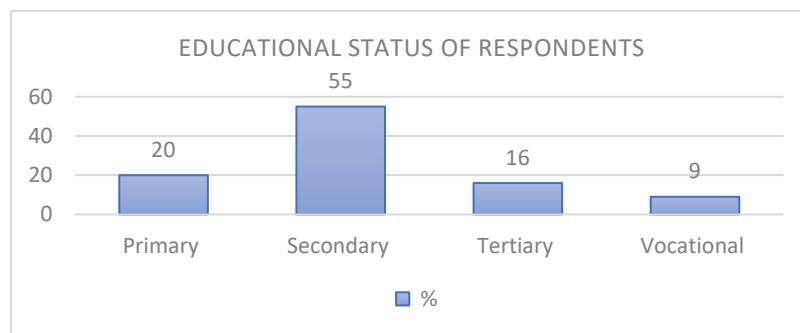


Figure 15: Educational Distribution of Respondents

Source: PGM Survey 2025

3.7 Occupational Distribution of Respondents

Figure 16 shows the occupational distribution of the respondents in the study area. 85% of the respondents are engaged in farming, 4% each are engaged in trading, artisanal work and transport service respectively, 2% are in the civil service, while 1% is retired. This shows that majority of the population (85%) are engaged in agriculture and therefore any activity that will impact the agricultural resources/ activities of this sector negatively or positively will affect the community and people negatively or positively respectively. The ATC as an agribusiness project, when comprehensively planned, sustainably and inclusively managed and implemented will impact the people and community positively.

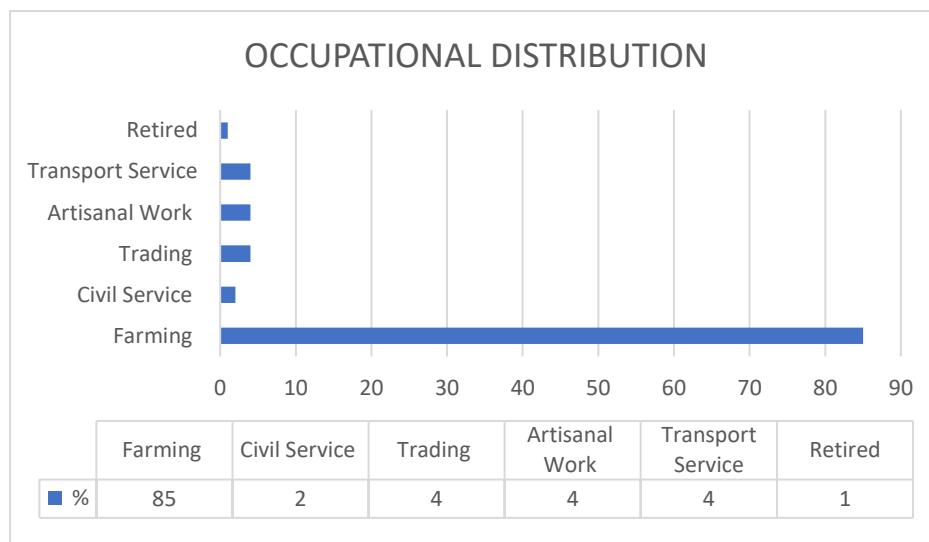


Figure 16: Occupational Distribution of Respondents

Source: PGM Survey, 2025

Income Distribution

From the survey on the income distribution, 30% of the respondents earn between N10,000 and N30,000 monthly, 21% earn between N30,000 and N50,000, 14% each earn N50,000 - N80,000 and N80,000 - N120,000, while 21% claimed to earn N120,000 and above monthly (Figure 17). It is expected that the proposed project will boost the income of the people in the area through their employment and contracting opportunities.

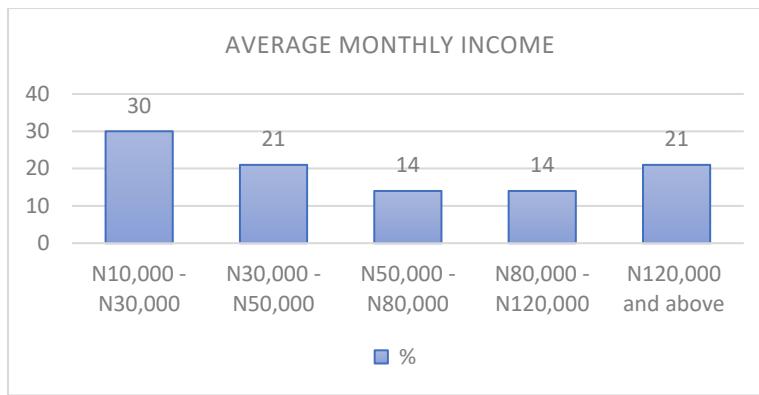


Figure 17: Average Monthly Income of Respondents

Household Expenditure Pattern

Table 19 Shows the household expenditure pattern of the people in the study area. The analysis shows that majority of the households spend a large proportion (42%) of their income in purchasing food for their families, 10% to provide education for their children, 15% each for fuel for energy and lighting, and cost of transportation respectively, while 6% and 7% go for health care and clothing respectively. This can be attributed to the high cost of food items and increased energy and transport costs currently being experienced in the country occasioned by fuel subsidy removal and devaluation of the naira against international currencies.

Table 19: Household Expenditure Pattern

Items of expenditure	% of income spent
Food	42
Education	10
Health	6
Clothing	7
Transport	15
Fuel	15
Others	5

Source: PGM Survey 2025

Religious Affiliation

Figure 18 shows the religious affiliations of the respondents in the project communities. From the figure, 100% of the respondents surveyed claimed to be Christians. This result was corroborated by elders and leaders of the community who informed during the FGD that about 98% of the residents were Christians, while 2% were a mixture of Muslims, African Traditional Religious (ATR) worshipers and Atheists.

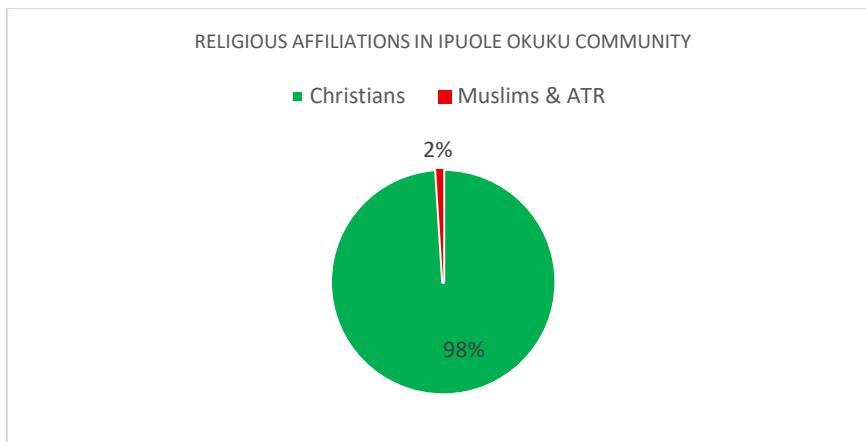


Figure 18: Religious Affiliation of Respondents

Source: PGM Survey 2025

Availability of Basic Facilities and Amenities

Table 20 represents available sources of drinking water and their usage in the study community. The sources include boreholes, public taps, rivers/streams, hand dug wells and rain water. Analysis of the usage by the households indicate that 54% of the residents use borehole water as their drinking water source, 24% use public taps, 10% use river/stream water, while 8% and 4% use hand dug wells and rain water respectively.

Table 20: Available Drinking Water Sources and Usage by Households

Water sources	% of Users
Borehole	54
Public taps	Available but some are nonfunctional 24
River/ Stream	10
Hand dug wells	8
Rainwater	4

Source: PGM Survey 2025



Plate 3.2: Public tap (hand pump) for Water Supply in Ipuole Okuku village

Availability of Educational Facilities

Table 21 shows the availability of different educational facilities in the community. The study shows that Ipuole Okuku village has 10 No. private nursery/primary schools, 3No. public primary schools, 1No. public and 1No. private secondary schools and a tertiary institution – The University of Cross River State, Okuku campus.

Table 21: Availability of Educational Facilities

Educational facility	Availability	Numbers
Nursery/Primary schools	Yes	10 No. (private)
Primary schools	Yes	3 No. (govt), 2 (private)
Secondary schools	Yes	1 No. (govt), 1 (private)
Tertiary institutions	YES	1 No. (Okuku campus of UNICROSS)

Source: PGM Survey 2025

Sources of Power Supply for Lighting

From Statistics, 90% of the respondents claimed to be connected to the National Grid for electric power supply, however, they complained of very high shortage of power supply and reliance more on generator use by those who can afford generator and fuel. Other sources of power for lighting in the community include solar panels, kerosene lamps and torchlights.

Available Sources of Energy

Table 22 shows the survey results for sources of energy used for cooking in households in Ipuole community. The results show that 66% of the respondents use firewood, 30% claimed to use gas, while 4% use charcoal. The high usage of firewood is occasioned by the high cost of gas. The firewood is reportedly sourced from the local forests in the area and can lead to deforestation

Table 22: Showing Available Sources of Energy for Cooking

Types of energy	% of population
Firewood	66
Gas	30
Charcoal	4

Source: PGM Survey 2025

Available Means of Commercial Transportation

The available means of commercial transportation in the project community include bicycle, motorcycle and tricycle (Keke) Motorcycle was identified as the major means of transportation in the community.

Transportation cost

The respondents indicated that a drop with a motorcycle (bike) cost between N400-N500/drop within the communities because of bad roads, while keke (tricycle) costs N300/drop

Housing Ownership

Table 23 showing housing ownership status of residents of the project community. The table indicates that majority of the respondents 60% and 50% live in their own houses, 20% and 10% live in their family houses, while 30% live in rented houses.

Table 23: Housing Ownership Status of Residents

Category	%
Owner	50
Renter	32
Family House	18

Source: PGM Survey 2025

Building Materials Used in Housing Construction

Table 24 presents the type of materials used in roofing houses in the project communities. The table shows that majority of the people, 75% use zinc for roofing, 20% use aluminium for roofing, 3% use asbestos, while 5% use thatch as their roofing material in Ipuole Okuku village.

Table 24: Building Materials Used in the Project Communities

Type	%
Cement block wall	78
Brick walls	8
Mud walls	14

Source: PGM Survey 2025



Plate 3: Showing Building Materials Used for Walls & Roof

Table 25: Showing Building Materials Used for Walls & Roof

Materials	%
Zinc	75
Aluminum	20
Asbestos	3
Thatch	5

Source: PGM Survey (2025)

Cost of House Rent in the Project Community

Table 25 and Plate 3 give details of building materials in the community while Table 26 shows the current cost of rent for different house types in the project community. The cost of rent depends on the size and quality of the house. While a single room cost between N60,000 – N84,000 per year, a self-contained costs N120,000-N150,000, a 1-bedroom flat goes for N200,000 - N250,000, while a 2-bedroom flat is reported to cost between N300,000-N350,000 per year. House rent in the communities may be expected to increase with the coming of the project as it will cause influx of workers to the area, exacerbating the need for rental accommodation. It will also boost the incomes and livelihood of landlords in the area.

Table 26: Showing the Current Cost of Rent for Different Types of Houses

HOUSE SIZE	COST OF RENT (N)
One room	N60,000 – N84,000/year
Self – contain	N120,000 – N150,000/year
One bedroom flat	N200,000 – N250,000/year
Two- bedroom flat	N300,000 – N350,000/year
Three-bedroom flat	N450,000 – N600,000/year

Source: PGM's Survey (2025)

Community Needs and Priority Ranking of the Needs by the Community (with 1 as the highest and 6 as the lowest priority)

Table 27 shows the priority needs of the community and the priority ranking of the needs by the community. The ranking is based on survey results, input from focused group meetings with the elders, youth and women leaders from communities. From the table, the first priority need of the community is the provision of tarred roads to link the community, second, skills acquisition centre, third, potable water, fourth, steady power supply, fifth, improved health facilities and sixth, provision of educational facilities.

Table 27: Showing the Priority Needs Ranking by the Community

Community Needs	Priority ranking level
Portable water supply	3
Steady Power Supply	4
Provision of Educational Facilities	6
Provision of Health Facilities	5
Provision of Skills Acquisition Facilities	2
Provision of Roads to link the communities	1

Source: PGM's Survey (2025)

Socio - Economic and Livelihood Activities of the Project Affected Communities

The project community of Ipuole Okuku is basically an agrarian community depending mostly on farming as their major occupation, source of income and livelihood.

Crop Farming

Majority of the members of the community are engaged in crop farming and the major crops grown are cassava, yams, rice. Others include vegetables, maize, oil palm, cowpea, guinea corn, potatoes, beniseed, melon, etc. They produce for both home consumption and for sales.

Challenges to Crop Farming in the area

Majority of the respondents (80%) identified pests/diseases attack on crops, lack of credit facility and lack of knowledge and information as the major challenges to crop farming in the two communities. This indicates the need to integrate training in integrated pest management, climate smart farming and provision of credit facilities to farmers as deliberate policies of the ATC to improve and enhance the operations of the farmers in the area in order to sustainably provide raw materials to the ATC. This will help boost the profitability, incomes and livelihoods of the farmers. As part of the SIA recommendations to strategically and specifically address the pests' problems.

3.7.1.1 Livestock Farming

Many of the respondents in the community are also engaged in livestock farming such as poultry, goats, pigs, etc. production. They produce for both home consumption and for sales. The major challenge to livestock production is high cost of feeds, poor quality of feeds and diseases especially in poultry production. These challenges can be addressed through the inclusion of quality feed milling facilities as component of the ATC to provide quality feeds

at affordable prices to farmers. Majority of the livestock farmers reported not having access to veterinary services. This gap, however, has already been taken into consideration and addressed in the planning and development of the ATC by the provision of a veterinary clinic in the ATC.

3.7.1.2 Artisanship Practices

Artisanship practices in the study communities include welding, electrical and electronic installations and repairs, auto mechanics, electrical works, panel beating, fashion design, hair dressing, pedicure and manicure, food service, carpentry and furniture making, among others. Other livelihood activities in the area include petty trading, transportation services, and sand mining and employment in the public and organized private sectors. Most livelihoods including farming, trading, artisanship practices, transportation services are operated in the informal sector.

3.7.1.3 Experience of External Shocks and Coping Measures

Respondents indicated having experienced external shocks in the last year ranging from floods, late rains, agricultural pests/ diseases, insecurity/violence to theft of crops etc. In the face of these shocks the people reported employing many coping strategies ranging from reduced expenses on agricultural inputs, borrowing more money than usual, reducing household expenditures on health and education, selling more animals than usual to withdrawing children from school.

3.7.1.4 Natural Resources and their Exploitation for Sustenance

Generations of members of Ipuole Okuku community have depended on the natural resource's endowment of their area namely land, forests and water bodies for their sustenance over the years. This has led to encroachment and levels of forest degradation. Land provides space for housing, other physical developments, and farming. Forests in the community provide wood and timber for housing construction, furniture making and firewood for cooking.

Housing, agricultural, infrastructural and industrial developments have encroached significantly on the lands, forests that were traditionally exploited for livelihood.

3.7.1.5 Natural Resource Conservation Practices

Traditional conservation practices in the communities try to control and limit resource exploitation in order to allow for rejuvenation through regrowth. They mostly involve temporary or permanent prohibitions on entry and exploitation of resources in some locations like shrines and the forests around them, ban on cutting economic trees for use as firewood, and encouragement of the practice of shifting cultivation. The use of lands and forests for housing, infrastructural and industrial development has hampered most of these traditional practices. Shifting cultivation and its attendant bush fallow system operates by leaving farmlands fallow for a number of years after cultivation. Farmlands are left fallow for between three and seven years, depending on availability of farmlands. The fallow period allows for natural regeneration.

Land Ownership and Tenure

The legal framework for land ownership, acquisition and resettlement in Nigeria is provided by the Constitution of the Federal Republic of Nigeria (1999) and the Land Use Act CAP 202 LFN 2004. The Act recognizes the State Government's ownership of all lands and it provides the framework for payment of compensation for land acquisition for development purposes. Land has a great socio-economic and socio-cultural significance as it serves as a major livelihood and development asset, and generational inheritance. Therefore, in spite of the law, the communities still practice their traditional land ownership systems which vests ownership of lands in extended families. The families allocate, sell or lease parts of their lands to individuals and corporate organizations as they wish. Such lands can be put to any use including housing, infrastructural and industrial development. Family lands are managed by males in the family.

The major land uses in the community include agriculture, housing, industrial and infrastructural development. These account for more than 90% of land use in the communities.

Employment Situation in Households

Employment and unemployment are considered among the population aged 15-64 years. The labour force in Nigeria has been defined as covering all persons aged 15-64 years who are willing and able to work regardless of whether they have a job or not (NBS Annual Abstract of Statistics, Vol. 1, 2016). Some residents of the communities within this age bracket are employed in livelihood activities at micro, small and large scale in the informal, public and organized private sectors, and there are also residents who are unemployed and underemployed. The unemployed are those that have actively been looking for work but have not been able to secure any in six months preceding this study, while the underemployed are those doing jobs that are less than their qualifications and desire.

Nigeria has had high unemployment and underemployment rates in the last decade. In the third quarter of 2017, the National Bureau of Statistics (2018) reported unemployment rate of 18.8%, underemployment of 21.2% and combined unemployment and underemployment rate 40.0%. It also reported an increase in unemployment rate from 27.1% in the second quarter of 2020 to 33.3% in the last quarter of 2021, (<https://www.nigerianstat.gov.ng>). Residents of the community have reported high level of unemployment of over 50% of the working age in the community, despite the availability of many skilled workers in the community. It is expected that the proposed project will provide employment for some residents of the community

Available Infrastructure and Their Functional Status

Infrastructural facilities comprise physical amenities including access roads, streets, bus stops, telecommunication facilities and meeting halls and social amenities which include water, education, health and electrification facilities. Others are markets, hospitality and security facilities.

3.7.1.6 Roads

There is a tarred road in Okuku town but there is no tarred road in Ipuole Okuku village. All the roads in the village are dirt roads (Plate 4) which are bad and very challenging during the rainy seasons.



Plate 4: Dirt Road in Ipuole Okuku

3.7.1.7 Telecommunications facility

Residents of the community have access to mobile telecommunication services provided on the GSM networks of MTN, Glo, and Airtel and reported of occasional fluctuations in service.

3.7.1.8 Community Hall

The community has a town hall as shown on Plate 5

3.7.1.9 Health Facilities

Ipuole Okuku community has a health centre (Primary Health Centre) and a number of private clinics as can be seen in Plate 6.



Plate 5: Ipuole Okuku Town Hall (left)

Plate 6: Primary Health Care Centre at Ipuole Okuku (middle & right)

3.7.1.10 Educational Facilities

Ipuole Okuku has private Nursery and Primary schools, public primary schools namely: Community Primary School, Ipuole, Holy Child Convent School and St. Joseph's Primary School, etc., Secondary schools which include St. Mathias Offoboche Secondary School, St. Joseph's Secondary School, Model Secondary School (Plate 7) and a tertiary institution- the Cross River State University, Okuku Campus (Plate 8).

3.7.1.11 Potable Water supply

Ipuole Okuku has different drinking water sources which include boreholes, public taps, rivers/streams, hand dug wells and rain water (Plate 9). They complained that some of the public taps have broken down and that they need potable water from borehole.



Plate 7: Different educational facilities (St. Mathias Offoboche Secondary School, Holy Child Convent Primary School, St. Joseph's Primary School) in the host community



Plate 8: University of Cross River State, Okuku Campus (1st & 2nd - left)

Plate 9: Sources of water supply in Ipuole Okuku (3rd & 4th - right)

3.7.1.12 Electricity

90% of the respondents claimed to be connected to the National Grid for electric power supply (Plate 10), however, they complained of very high shortage of power supply and reliance more on generator use by those who can afford generator and fuel. Other sources of power for lighting in the community include solar panels, kerosene lamps and torchlights.

3.7.1.13 Markets

Ipuole Okuku has a very large market – the Okuku market which is a weekly market operating every 5 days (

Plate 11).

3.7.1.14 Hospitality Centres

The community has a number of hospitality centres viz: Sanctus Hotels, Polygas Hotels, etc.

3.7.1.15 Security in the Study Area

There is a Police Station in the community and they provide public security to the communities.



Plate 10: Electric Power Infrastructure in Ipuole Okuku village (left)

Plate 11: Okuku Market (middle & right)

Impact History

Impact history refers to the experience of past projects and other historical events. The elders of the community during focused group meetings and discussions lamented that the community has had a long history and experience of failed and abandoned government projects in the community and that these had negative impacts on the psyche, morale, hope and confidence of the people in government development projects (Plate 12). These failed or abandoned projects have taken and occupied large expanse of lands that the people could have used for their farming and improvement of their livelihoods. They gave a list of the existing failed and abandoned projects in the communities to include:

1. The Asbestos roofing and ceiling project – fenced and abandoned
2. The Ceramics production project (abandoned)
3. The large expanse of land taken for the proposed stadium (fenced and abandoned) - Started by Governor Liyel Imoke over 16 years ago. Now used to hold cattle.
4. The Rice Mill built but not operational and a large part of the land has been parcellated and fenced off by an individual without being used.
5. Large expanse of land taken for Airforce base has not been developed and lying fallow.
6. The land taken for Navy school fenced with only one building and not operational
7. The Grain silo built but not operational

Given the litany of the failed and abandoned projects in the communities, the people are worried and hoping that this ATC project will not go the way of past projects.



Plate 12: Abandoned projects in Ipuole Okuku (proposed beverages factory (carbonated and soda drinks (left); proposed Roofing Sheets Factory (middle); and proposed site for stadium (right)

Problems Confronting the Community

Members of the community indicated the following as some of the problems confronting the community.

- Lack of employment/ empowerment of the youths and women in the community
- Lack of adequate potable drinking water
- Lack of skills acquisition centre
- Lack of improved health facilities to meet the health needs of the people
- Lack of tarred all season motorable roads

- Flooding and erosion
- Lack of wastes management facilities

Socio-Economic Sensitivities and Vulnerable Groups

The proposed ATC project is a significant project that will take 37.8 hectares of land and its development process will potentially impact public and private assets, livelihoods and incomes. The socio-economic environment will be sensitive to changes that will arise as a result of the project. Sensitivities associated with it will include safeguarding livelihoods and household income levels, and protecting residents and workers from diseases and accidents, Table 28.

Table 28: Socio-Economic Sensitivities

Socio-Economic Component	Sensitivity and Benefits
Maintaining household income flows through employment and contracting opportunities.	<p>During the construction phase the project would provide opportunities for employment and contracting which will enhance household incomes. However, it will also lead to the loss of farmlands, livelihoods and unemployment.</p> <p>The ATC project will provide training to enhance farmers productivity, process and add value to farmers' produce and provide ready market to producers. This will help prevent produce spoilage and wastage, increase incomes, enhance the livelihoods of the people and reduce poverty. Household income levels will be impacted positively for the employed and adversely for the displaced and unemployed. Household income flows need to be maintained and indeed enhanced. Payment of appropriate compensation and implementation of sustainable Livelihood Restoration and Enhancement Plan (LREP) will help mitigate negative impacts of the project on the people and the community.</p>

Source: PGM Survey, 2025.

Vulnerable Groups

Project activities will potentially impact differently on different groups and individuals. Some of these will be traditionally vulnerable households which include those headed by women, minors, physically challenged and chronically ill persons and the aged. Vulnerability will arise as family farms and crops will be destroyed in the course of the proposed project implementation. This will cause loss of livelihoods and incomes to owners and dependents.

It is envisaged that movement of equipment and vehicles will increase with project construction phase. Residents and frequent users of the roads would be vulnerable to disruptions of traffic and complete closure of portions of the road during the project construction phase. Potentially vulnerable groups include physically challenged residents, children and the elderly.

Unemployed community youths will be another vulnerable group. There could be agitations and restiveness if desire for employment is not met due to limited opportunities in the project. The youth are also very energetic and impressionable which could lead to several other vulnerabilities associated with social vices. If drug abuse and commercial sex activities increase in communities in the area due to project activities, the youth would be most

vulnerable to the influence of these activities. These vices could have long lasting impacts on morals and life of the youth.

Payment of appropriate compensation and implementation of sustainable Livelihood Restoration and Enhancement Plan (LREP) will help mitigate the negative socio-economic impacts of the project on the people and the community.

4 IMPACTS ON LIVELIHOODS

This section identifies and categorizes the potential livelihood impacts associated with the CR-SAPZ's proposed ATC project in Okuku. While the project does not involve physical displacement or relocation of households, it will lead to economic displacement which is defined as the loss of income sources or access to livelihoods resulting from project-related land take over or restrictions on land use.

4.1 Description of Permanent and Temporary Impacts

The proposed development will bring important infrastructure to the Okuku area, including agro-industrial processing zone, administrative buildings, waste management systems, and access roads. While these are expected to bring long-term benefits, they also carry certain social and economic costs for local communities, particularly those whose lives are closely tied to land-based livelihoods. Some of the impacts are temporary others and permanent.

4.2 Permanent Impacts

Permanent impacts refer to irreversible changes in land use or access that will continue beyond the construction phase. These will mostly affect farmers, pastoralists, (predominantly Fulani herdsmen) whose current activities are based within or adjacent to the project footprint. For many households, access to farmland is more than a means of subsistence, it is a cultural identity passed down through generations. Similarly, grazing land supports not only livestock but also the traditions and economies of pastoralist families. The 68 affected households will permanently lose access to 37.8 ha cultivable farmland within the proposed development zones, which could reduce household food production and income.

4.3 Temporary Impacts

During the construction phase, several short-term disruptions are anticipated. These impacts may not be permanent, but they can significantly affect daily routines and seasonal income sources.

These may include:

- Restricted access to farms and grazing routes due to earthworks, machinery movement, or fencing of the project site.
- Interruption of informal trading spots, especially for women operating near roadsides or community junctions.
- Disturbance to local water access points, boreholes, or footpaths during the laying of utility pipes or site preparation.
- Temporary loss of income from disrupted farming especially during peak agricultural seasons.

Table 29 provides a summary of the identified permanent and temporary impacts, grouped by affected activity or asset.

Table 29: Summary of Anticipated Permanent and Temporary Impacts in the Project Area

Impact Category	Nature of Impact	Affected Group	Type	Likely Duration
Loss of farmland	Permanent loss of cultivated land	Smallholder farmers	Permanent	Long-term (post-construction)
Access restrictions	Blocked paths to farms	General community members	Temporary	Construction phase only
Disturbance of water points	Interruption to streams	Women and children collecting water	Temporary	Short-term (site preparation)
Loss of seasonal income	Suspension of farming or trading activities	Low-income households	Temporary	Peak farming/trading periods

4.4 Livelihood Categories Affected

The proposed project will affect a variety of livelihood groups whose daily survival and long-term economic well-being depend on access to land, grazing areas, informal markets, and local infrastructure. These groups have developed adaptive systems over the years, blending traditional knowledge with emerging practices to sustain themselves and their households. As such, the impacts on these livelihood systems go beyond the physical loss of land or access, they touch on cultural identity, household food security, income diversity, and long-established economic routines. During consultations, many community members shared their concerns about how disruptions to their daily economic activities could create long-term ripple effects, especially for households with little or no savings or alternative income sources. Women and youth expressed a strong desire to be included in livelihood restoration programs that would not only replace lost income but also open new and sustainable economic opportunities. Table 30 present a summary of the livelihood categories affected.

Table 30: Summary of Affected Livelihood Categories and Nature of Impacts

Livelihood Category	Description of Activities	Nature of Impact	No. of PAPs/HH
Crop Farmers	Cultivation of staples such as yam, cassava, maize, millet, rice, and groundnuts for household consumption and market sale	Permanent loss of farmlands or restricted seasonal access within designated development zones	68
Youth Labourers	Daily-wage labor in farming activities	Temporary job loss due to access restrictions	
Artisans and Vendors	Local blacksmiths, welders, mobile phone repairers, barbers, and other informal service providers	Reduced foot traffic during construction; potential loss of informal workspaces or stalls	

4.5 Cultivated areas

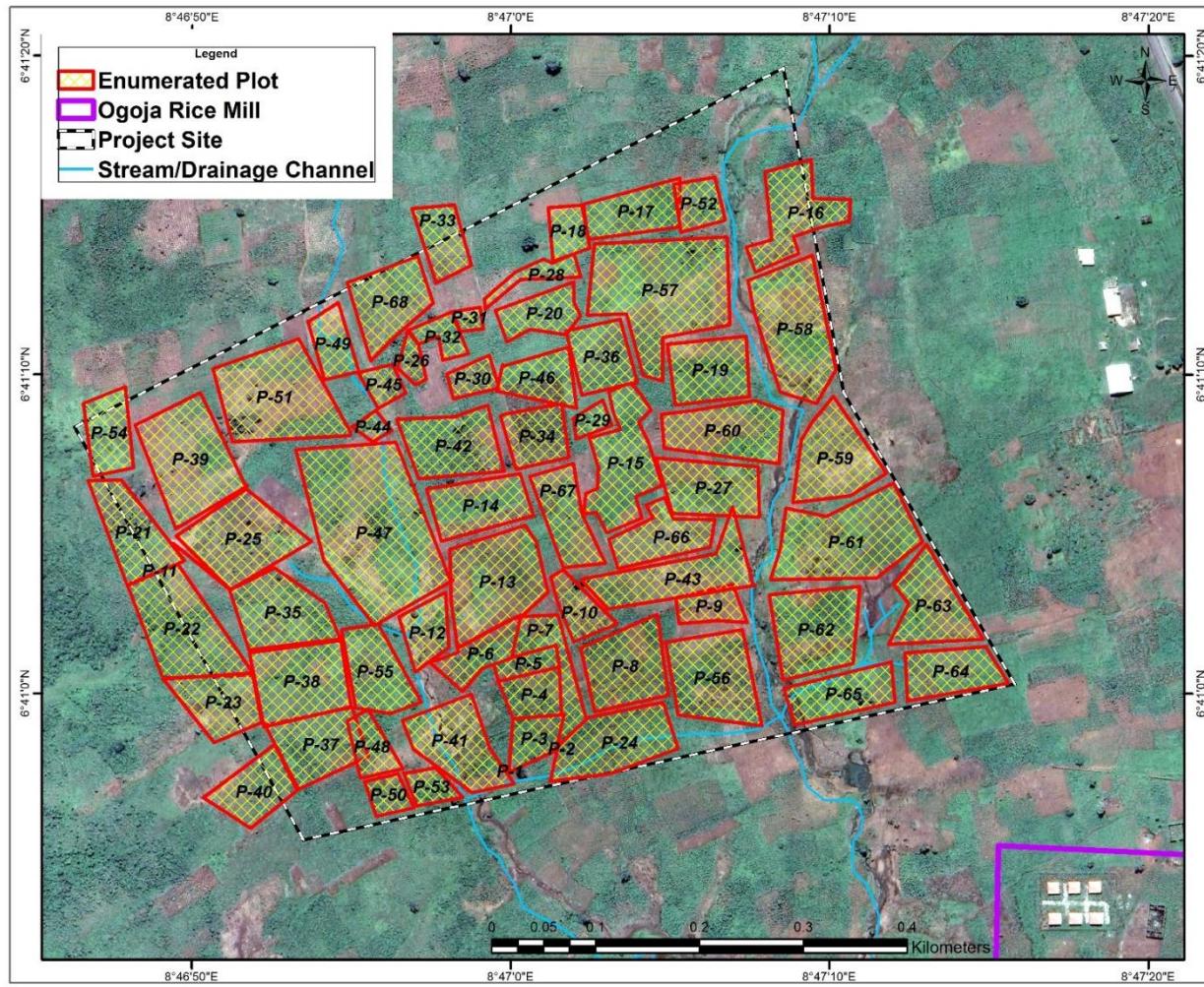
The project area is predominantly used for agricultural purpose while some trees and shrubs are still standing despite the agricultural activities. Plants occurring here are mainly food crops such as cassava (*Manihot esculenta*), maize (*Zea mays*), plantain (*Musa Spp.*), and yam (*Discorea rotundata*).

Table 31: Pre-settlement Estimated revenue from farming

Serial	Crop	Average seasonal yield / ha	Unit	Total farm size (ha)	Rate (N)	Estimated revenue
1	Cassava	12	Tons	20	100,000	24,000,000
2	Rice	4	Tons	6	700,000	16,800,000
3	Maize	3	Tons	2	150,000	900,000
4	Melon	1	Bag	2	250,000	500,000
1	Banana / plantain	500	Bunch	1	1,500	750,000
2	Oil palm	100	Bunch	0.1	1500	15,000
						42,965

					
<i>Ceiba pentandra</i> 6.683442, 8.785581	<i>Gmelina arborea</i> 6.683443, 8.785502	<i>Elaeis guineensis</i> 6.684841, 8.785599	<i>Mangifera indica</i> 6.684666, 8.785347	<i>Dialium guineense</i> 6.684370, 8.784046	<i>Tectona grandis</i> 6.684734, 8.783548
					
<i>Daniellia oliveri</i> (African copaiba balsam tree) 6.687361, 8.784910	<i>Khaya senegalensis</i> (mahogany) 6.687811, 8.784650;	<i>Inga laurina</i> <i>Guama (guava)</i> 6.687737, 8.784540	<i>Azadirachta indica</i> (neem) 6.687830, -8.784835	<i>Parkia biglobosa</i> African (locust-bean) 6.687636, 8.784245	<i>Peltophorum africanum</i> sond 6.685733, 8.782885;
					
<i>Anacardium occidentala L.</i> (Cashew) 6.687379, 8.782978	<i>Musa paradisiaca</i> (Banana) 6.686352, 8.782345	<i>Morinda lucida</i> Benth (Brimstone tree) 6.686121, 8.781426;	<i>Irvingia gabonensis</i> 6.684904, 8.783855	<i>Musa acumunata</i> (Plantain) 6.683413, 8.785396	<i>Tamarindus indica L</i> 6.685745, 8.782867

Plate 13: Individual Georeferenced Existing Tree and Shrubs in the Project Area
(PGM fieldwork, 2025)



Location Map of Project Affected Farmlands within the Project Site in Okuku, Yala LGA.

Figure 19: Enumerated farmlands / economic trees

5 LIVELIHOOD RESTORATION STRATEGIES

This section outlines the proposed strategies and interventions to restore, improve, and sustain the livelihoods of PAPs in the project area. The strategies are designed to respond to the specific types of economic displacement identified and are tailored to local livelihood systems, skills levels, and market opportunities. All interventions will be inclusive, culturally appropriate, and responsive to the needs of the PAPs.

5.1 Training, Re-skilling, and Vocational Programs

In response to the potential loss or disruption of livelihoods due to the conversion of farmland, and informal economic spaces, the project will implement a targeted skills development program. This aims at providing project affected persons, particularly women, youth, and land-dependent households with practical and sustainable alternatives that align with the economic opportunities emerging from the ATC development.

Many of the affected individuals are currently engaged in subsistence or small-scale activities, with limited access to formal training or diversified income streams. As such, this intervention is not only a mitigation measure but also a chance to support long-term economic resilience and social inclusion. The key components of the program include:

- Vocational Training: agro-industrial processing, basic carpentry, tailoring, solar panel installation and maintenance, food safety, and small-scale agro-industrial processing. These will respond to both existing skills and the projected needs of the ATC ecosystem.
- Short-term re-skilling: For those transitioning from land-based livelihoods to roles within the AIH facilities, training will be offered in areas such as packaging and processing operations, facility security, materials handling, and logistics support.
- Accreditation and certification: All trainings will be linked to certification programs in collaboration with the CRMAI, National Directorate of Employment (NDE) and the Yala LGA, to enhance employability and formal recognition of new skills.
- Delivery Mechanism: Trainings will be delivered in UBE Primary school in Okuku, with mobile outreach to other project-affected communities. Where feasible, existing local artisans and trainers will be engaged to co-facilitate sessions in familiar dialects, ensuring cultural relevance and community ownership.

This training component will be rolled out in phases, beginning with a needs assessment and enrolment drive during the early stages of project implementation. Special effort will be made to ensure the inclusion of female-headed households, youth at risk, and persons without formal education or land title.

5.2 Agricultural Support (Inputs, Tools, Extension Services)

Farming remains the primary source of livelihood for the majority of households in the project area. To support those whose agricultural activities may be disrupted by the AIH development, this component of the LRP is designed to help farmers sustain and, where possible, improve or diversify their agricultural production. The program will offer practical, accessible, and timely

support to smallholder farmers households, helping them rebuild their capacity and adopt more resilient practices. Support measures will include:

- **Agricultural Inputs:** Distribution of improved maize, rice, beans and groundnut seeds, organic and inorganic fertilizers, essential hand tools like cutlas and hoes, and basic irrigation kits to affected farmers. These inputs will be tailored to local crop preferences and agro-ecological conditions for each project affected household/person.
- **Extension and technical services:** Training and support will be provided on climate-smart farming methods, soil and water conservation, fodder cultivation, and post-harvest storage and processing techniques. This will help improve productivity while promoting environmental sustainability.

Extension workers will visit the project affected communities to provide hands-on training and peer learning opportunities, especially for women, youth, and those with limited access to formal education. Implementation will be done in close collaboration with the CRMAI to ensure coordination with existing government programs and avoid duplication.

5.3 Support for Micro-Enterprises and SMEs

In the project area, many women and young people sustain their livelihoods through small-scale trading, home-based processing, and informal services. These micro-enterprises are often fragile but play a vital role in household income, food security, and community resilience. To support those whose businesses may be affected or those seeking to start new ventures as part of their livelihood transition CR-SAPZ will provide targeted assistance to help revive, strengthen, and grow these enterprises. The planned support includes:

- **Startup grants and business Kits:** Beneficiaries will receive tailored startup support based on their business type. This will include grinding machines, sewing machines, milk processing tools, mobile food stalls, and other relevant equipment to help restart or scale their operations.
- **Enterprise development training:** Project-affected Persons (PAPs) will be trained in essential business skills such as bookkeeping, pricing, inventory control, customer relations, and marketing. This practical training will be especially focused on first-time entrepreneurs and informal traders.
- **Support for cooperative formation:** Where possible, small business owners will be encouraged and supported to form cooperatives. This will improve their ability to access inputs, share resources, reach larger markets, and negotiate better terms for supplies and services.
- **Market integration:** Business groups will be strategically linked to infrastructure being developed under the AIH, such as storage hubs, local markets, and quality control centers. These linkages will give them better access to buyers, reduce post-harvest losses, and support long-term viability.

5.4 Access to Financial Services and Business Advisory

To enhance self-reliance and promote financial inclusion among PAPs, particularly women and youth, the CR-SAPZ will facilitate access to a range of financial and advisory services that can help sustain livelihoods over the long term. The key areas of support include:

- **Savings and credit groups formation:** The project will encourage the formation and strengthening of Village Savings and Loan Associations (VSLAs) also known as *etibe in vernacular* and similar community-based financial groups. These will provide a platform for safe savings, access to small loans, and peer support particularly benefiting women and young people with limited access to formal banking.
- **Linkages to Microfinance Institutions:** PAPs will be supported to open accounts with microfinance banks and cooperatives like Moniepoint, Opay, Fairmoney, etc. Where appropriate, assistance will include literacy and financial education sessions, orientation on the use of mobile money platforms, and facilitation of digital transactions.
- **Business Advisory Services:** The project will also provide hands-on guidance to PAPs involved in small businesses. This will cover areas such as business plan development, assistance with registration and licensing, and compliance with relevant regulatory requirements, helping small entrepreneurs to formalize and grow their operations.

Recognizing that some PAPs may have low levels of literacy or limited prior exposure to formal financial systems, special provisions will be made to ensure they can participate fully in financial training and services. This may include the use of visual training materials, local language facilitators, and peer learning approaches.

5.5 Job Placement, Internships, and Local Employment Links

The implementation of the CR-SAPZ is expected to create a range of employment opportunities, both during the construction phase and throughout the operational life of its facilities. To ensure that PAPs especially youth and other economically active members benefit directly from these opportunities, targeted interventions will be carried out. The key strategies include:

- **Employment Registration Drives:** the project will organize employment registration exercises within affected communities to capture details of skilled, semi-skilled, and unskilled individuals. This database will be used to link suitable candidates to contractors and service providers engaged under the project.
- **Internship and apprenticeship programs:** structured internship opportunities will be created for young people, particularly recent graduates and school leavers, in SAPZ-linked institutions such as cocoa, rice and cassava processing centers, laboratories/quality control units, the disaster response unit, and research and training centers. These placements will provide hands-on experience and enhance employability.
- **Local hiring commitments:** the CR-SAPZ will work with the DBOC and operators to prioritize PAPs and indigenes of Okuku for available roles ranging from construction works to operations, maintenance, and administrative support. These commitments will be included in contracts (MOUs) and monitored as part of project compliance.

To support fair and transparent labour engagement, a dedicated labour desk will be established at the project site. The labour desks will serve as recruitment coordination hubs and will also provide oversight on employment conditions, workplace safety, and dispute resolution mechanisms.

5.6 Special Programs for Women, Youth, and Vulnerable PAPs

In recognition of the unique vulnerabilities faced by certain groups within the project area, the LRP will implement tailored interventions to promote equitable participation and reduce exclusion. The goal is to ensure that women, youth, elderly, and persons living with disabilities are not only protected but actively included in the economic opportunities created by the AIH. Key initiatives under this component include:

- **Livelihood Support for Female-headed Households:** Special provisions will be made for women who head households, particularly widows and single mothers. These include access to flexible training schedules to accommodate domestic responsibilities.
- **Assistance for the elderly and disabled:** Elderly PAPs and those living with disabilities will receive direct livelihood grants or will be linked to existing government social protection programs such as conditional cash transfers or CR health insurance schemes. Where necessary, the project will facilitate access to assistive devices.

All interventions will be tracked using gender and vulnerability-sensitive indicators. The project will ensure that monitoring frameworks capture both participation and outcomes to adjust programming and improve impact where needed.

Table 32 presents the 3-year post-settlement estimated revenue of N120m (USD 77,419), N70m (USD 45,161), N10.5m (USD 6,774) and N20m (USD 12,903) respectively from cassava, rice, maize and melon farming by the PAPs, forecasting livelihood improvement, beyond restoration for three consecutive years.

Table 32: post-settlement estimated revenue from farming

Serial	Crop	Average seasonal yield / ha (tons)	Unit	Total farm size (ha)	Rate (N)	Estimated revenue
1	Cassava	30	Tons	40	100,000	120,000,000
2	Rice	5	Tons	20	700000	70,000,000
3	Maize	7	Tons	10	150,000	10,500,000
4	Melon	2	Bag	40	250,000	20,000,000
						220,500,000

6 ELIGIBILITY, ENTITLEMENTS & COMPENSATION FRAMEWORK

This section defines the eligibility framework and entitlements for individuals and households economically displaced by the CR-SAPZ project in Okuku. It outlines the process by which PAPs can access livelihood restoration support and how the entitlements will be tracked and delivered.

6.1 Eligibility Criteria for Inclusion in Livelihood Programs

Eligibility for participation in the livelihood restoration programs is based on the principle of economic displacement, meaning loss or restriction of access to income sources or livelihood activities due to the AIH project. The following categories are considered eligible:

- Individuals and households who rent / use the farmlands within the project footprint.
- Seasonal users such as farm labourers who demonstrate regular dependence on the affected land.
- Women and youth whose income-generating activities are disrupted due to the land take over or access restrictions.
- Vulnerable persons and groups, including widows, elderly persons, female-headed households, people with disabilities, and households below the poverty threshold.

Eligibility has been determined through the census and socioeconomic survey conducted during RAP preparation, and verified against community registers and traditional authority validation.

6.2 Livelihood Entitlement Matrix (Linked to RAP)

The livelihood entitlement matrix aligns with the compensation framework outlined in the RAP and reflects differentiated support based on the nature and extent of livelihood loss. Table 33 shows the livelihood entitlement matrix.

Table 33: Livelihood entitlement matrix

Category of PAP	Type of Economic Loss	Livelihood Support Measures
Crop Farmers	Loss of farm plots, reduced access to land	Agricultural input support (seeds, fertilizer), tools, training in climate-smart agriculture, linkages to extension services
Youth labourers and artisans	Temporary job loss, income disruption	Short-term employment in construction, vocational training, internship programs
Vulnerable Groups	Livelihood loss, limited coping capacity	Priority access to all livelihood programs, direct cash or in-kind support, assistance with business start-up
Informal Workers (e.g., loaders, cleaners)	Loss of daily income	Job placement in AIH operations, re-skilling and referral services

These entitlements are consistent with AfDB OS 5 and Nigerian compensation regulations under the Land Use Act.

6.3 6.3 Procedures for Enrolment and Tracking

To ensure transparent access to the RAP and effective monitoring, the following enrolment and tracking procedures will be implemented:

1. Enrolment Process

- Eligible PAPs identified during RAP enumeration and issued unique identification numbers will be enrolled.
- A Livelihood Restoration Registry will be established, documenting household profiles, type of economic loss, and preferred support options.
- PAPs will be required to complete an enrolment form, verified by community leaders.

2. Orientation and Confirmation

- Orientation sessions will be held to explain available support options.
- Each PAP will confirm their chosen livelihood restoration path (e.g., training, input support, micro-grant) and sign a confirmation agreement.

3. Tracking and Reporting

- An electronic tracking system will be used to monitor participation and progress.
- Monthly reports will track delivery of support, beneficiary feedback, and performance indicators.
- Grievance redress mechanisms will allow PAPs to raise complaints or request a reassessment.

4. Institutional Oversight

- The CR-SAPZ Program Implementation Unit (PIU), supported by the Environmental and Social Safeguards team, will oversee enrolment and disbursement.
- Independent NGOs will be engaged to validate the process and ensure fairness.

6.4 6.4 Compensation Framework

Compensation refers to payment in cash or in kind for loss of land, access to land, and immovable asset or resources that is acquired or affected by a project.

6.4.1 Compensation Principles

The main compensation principles include the following:

- Provide transparent, fair and timely compensation (prior to land clearance or taking land) for displacement, including compensation for assets in accordance with national regulations and international standards, specifically the AfDB OS 5;
- Compensate for lost assets at full replacement, negotiated value.

6.5 Eligibility Principles

PAPs are eligible for compensation entitlements if they are the owners or users of immovable built or planted assets within the project site footprint. This includes structures (such as fences or sheds), land, crops, trees, and other natural resources. PAPs are eligible for compensation for their assets if they have formal or recognisable rights to these assets.

The typical eligibility criteria for compensation which may be implemented on subprojects is presented in Table 34.

Table 34: Eligibility Criteria for Compensation

PAP Classification	Eligible for		
	Compensation	No Compensation	Assistance
Those with legal right	Land or asset at replacement cost	For land, assets, and structure on the land after the cut-off date	Assistance needed
Those with temporary or leased rights at cut-off date	Land and assets at replacement cost	For land, assets, and structure on the land after the cut-off date	Assistance needed
Those who use land without any form of right	Assets on land at replacement cost	Assets on land after cut-off date	Assistance needed
Those with no legally recognized right but arrived before cut-off date.	Assets at replacement cost except that compensation may be “topped off” to allow the PAP to acquire a new residence.	Assets on land after cut-off date	Assistance needed
Those who arrived after Cut-off-date	None	None	None
Those with business located within the Community	Assets and lost income as a result of lost business during project duration	For business located in community after the cut-off date and outside the affected area.	Assistance needed

6.6 Establishment of Entitlement Cut-off Date

Prior to the commencement of a census survey during the RAP preparation, consultations were conducted to explain the **cut-off date** to PAPs as the date after which any individual or a family who moved into the project area but is not listed in the census list of PAPs, will not be entitled to compensation. The 17th of June, 2025 cut-off date was communicated officially to the communities in writing as well as in print media and radio advert (for notice of entry containing the cut-off-date and distributed to all communities, newspaper publication inviting stakeholders to meetings where the cut-off-date was further announced)

6.5 6.7 Entitlements

Based on the census undertaken along the line route, the categories of assets that are likely to be affected are:

- Farmland/land plots;
- Crops and economic trees.
- Completed commercial buildings
- Residential buildings both completed and uncompleted
- Livelihood/business premises

The entitlement matrix applicable to this project is presented in Table 36.

Table 35: Categories of PAPs and compensation according to Nigeria guideline and AfDB requirements

S/N	Category of PAPs	Nigeria Law (Land Use Act)	AfDB OS 5	CR-SAPZ's AIH
1	Land owners	Cash compensation based upon market value.	Entitled to compensation for land, priority is given to land-to-land compensation and/or compensation-in-kind in lieu of cash compensation. When cash payments are made, the affected people should be provided with counselling to ensure that they have the knowledge to use the compensation wisely. Compensation for other assets such as structures, crops and economic trees at full replacement costs.	Adapt the provisions of AfDB OS 5
2	Land Tenants	Entitled to compensation based upon the amount of rights they hold upon land	Entitled to resettlement assistance and compensation for all their assets such as crops, structures and other livelihood activities at full replacement cost.	Adapt the provisions of AfDB OS 5
3	Land users/Squatters	Not entitled to compensation for land, entitled to compensation for crops	Not entitled to compensation for land but are entitled to resettlement assistance including compensation for loss of livelihood activities, structures, crops etc to improve their former living Standards.	Adapt the provisions of AfDB OS 5
4	Owners of “Non-permanent” Buildings	Cash compensation based on market value.	These groups are entitled to resettlement assistance to improve their former living standards (compensation for loss of livelihood activities, structures, crops etc.).	Adapt the provisions of AfDB OS 5
5	Owners of “Permanent” buildings	Cash Compensation is based on market value. (that means depreciation is allowed)	Entitled to resettlement assistance and compensation for all their losses at full replacement costs before their actual move.	Adapt the provisions of AfDB OS 5
6	Losers of livelihoods (farmers, business people, employees)	No consideration other than cash values for assets as described above by asset category	Compensation factors in the “total economic cost” including the social, health, environmental and psychological impacts of the project and the displacement, which may disrupt productivity and social cohesion. Considerations are given to the loss of livelihood and earning potential of the affected	Adapt the provisions of AfDB OS 5

S/N	Category of PAPs	Nigeria Law (Land Use Act)	AfDB OS 5	CR-SAPZ's AIH
			people. Affected people are provided with targeted resettlement assistance with the aim of ensuring that their standards of living, income-earning capacity, production levels and overall means of livelihood are improved beyond pre-project levels.	
7	Grievance Procedure	No specific requirement for establishing an independent grievance mechanism	Requires the establishment of a culturally appropriate and accessible grievance redress mechanism to resolve, in an impartial and timely manner, any disputes arising from the resettlement process and compensation procedure as early as possible in the resettlement process. The borrower or client is required to work with informally constituted local committees made up of representatives from key stakeholder groups and, in particular, vulnerable communities to establish the grievance and redress mechanism. The grievance redress mechanism, which should be monitored by an independent third party should not impede access to judicial or administrative remedies but must inform affected people about the Bank's Independent Review Mechanism (IRM).	Adopt the provisions of AfDB OS 5
8	Rejection of Compensation	No categorical statement	No categorical statement	Put the compensation value in an escrow account and continue to negotiate using the GRM to resolve issues before proceeding with take over

Table 36: Entitlement Matrix

Asset	Impact	PAPs	Nigeria Requirement	Additional compensation or measures in line with AfDB's OS 5	Livelihoods Support
Land n-1 (Community)	Permanent/Temporary land take	Non-registered occupants of land who either cultivate such land based on customary ownership rights	Compensated for lost assets other than land (such as crops and structures) at replacement cost.	<ul style="list-style-type: none"> PAPs are consulted to confirm their compensation preferences (land-for-land or cash). Compensation at replacement cost (in- cash) or where possible, replacement land of the same quality and close to the location of the original land plot. Livelihood restoration and alternative income earning opportunities e.g. skills training offered. Support before, during and after taking cultivated land plots to cover a reasonable period of time necessary for PAPs to re-establish their new land plots (which they either were allocated, or bought with the received cash compensation). 	<ul style="list-style-type: none"> Livelihood restoration options to affected farmers: continuous crop cultivation on alternative plots, agricultural skills improvement training, or small livestock package
Crops and Economic Trees n=68		All PAPs regardless of legal status	Compensated for lost assets other than land (such as crops and structures) at replacement cost. <ul style="list-style-type: none"> None (crops are typically harvested prior to displacement) Compensation for perennial crops at existing compensation rates Trees are categorized as: saplings, productive, or old.		

Asset	Impact	PAPs	Nigeria Requirement	Additional compensation or measures in line with AfDB's OS 5	Livelihoods Support
	Loss of crops and productive trees (fruit/nut)	Tenants and original owners of the structure and land		<ul style="list-style-type: none"> Cash compensation at replacement cost on the basis of type, age and market price of tree and crops (the compensation amounts to be determined by a certified evaluator during the LRP stage) 	<ul style="list-style-type: none"> Crops-Training in improved agriculture methods and seeds provided for three seasons (18 months) Trees-Training in improved agriculture methods and saplings provided for fruit trees and perennial crops
	Owners of the structure other than house, whether or not the land on which the structure stands is legally occupied tenants	All PAPs regardless of their legal status	<ul style="list-style-type: none"> Complete rehabilitation/ restoration by the project; cash compensation for restoring affected cultural/community structures and installation to the recognize patron/ custodian. 		
Cultural, Religious and community structure facilities	School, church, mosque, water channels, pathways, and other community structures	Women headed household, disabled or elderly persons	<ul style="list-style-type: none"> Needs based special assistance to be provided either in cash or in kind. 	<ul style="list-style-type: none"> Construction of structure as other forms of compensation by the project where possible. 	<ul style="list-style-type: none"> Additional monetary incentives to succour losses

Entitlement Planning

The entitlement planning process entailed two primary tasks:

- Preliminary identification of the appropriate cash compensation rates at replacement value to compensate for specific impacts to eligible households, including crop compensation rates; and
- Design of complementary supportive measures to further mitigate the impacts of land-take, including livelihoods restoration initiatives, and vulnerable-person assistance measures.

Method of Compensation

Individual and household compensation will be made in cash, in kind, and/or through assistance in the knowledge and presence of both man and wife and adult children or other relevant stakeholders, where applicable. The preference for cash (through bank cheque) compensation has been an individual choice although every effort was made to instil the importance and preference of accepting in-kind compensation especially when the loss amounts to more than 20% of the total loss of productive assets, which is hardly the case for crops and economic trees, as this is a linear project.

Entitlement for Compensation

Entitlements for compensation are based on the eligibility criteria and the various categories of losses identified earlier and the actual census during the preparation of the RAP.

6.6 6.8 PAPs Enumeration & Valuation Methodology

6.8.1 PAPs Enumeration

GIS Technology used during the F of PAPs

Geographic information system (GIS) and remote sensing technology was adopted for the smooth enumeration of farmlands. High resolution satellite imagery of the project site was acquired from Google Earth Pro (2025) and was used in designing the GIS maps for navigation. Interactive PDF maps were produced using ARCGIS software (version 10.8) and uploaded in Avenza map application in mobile devices.

Avenza Maps is an application that gives us the ability to track and store information in the field as we collect data in places without reception (Figure 20). The technique gave an accurate and efficient outcome and helps in navigation throughout the project area likewise successful enumeration of project affected persons and their farmlands.

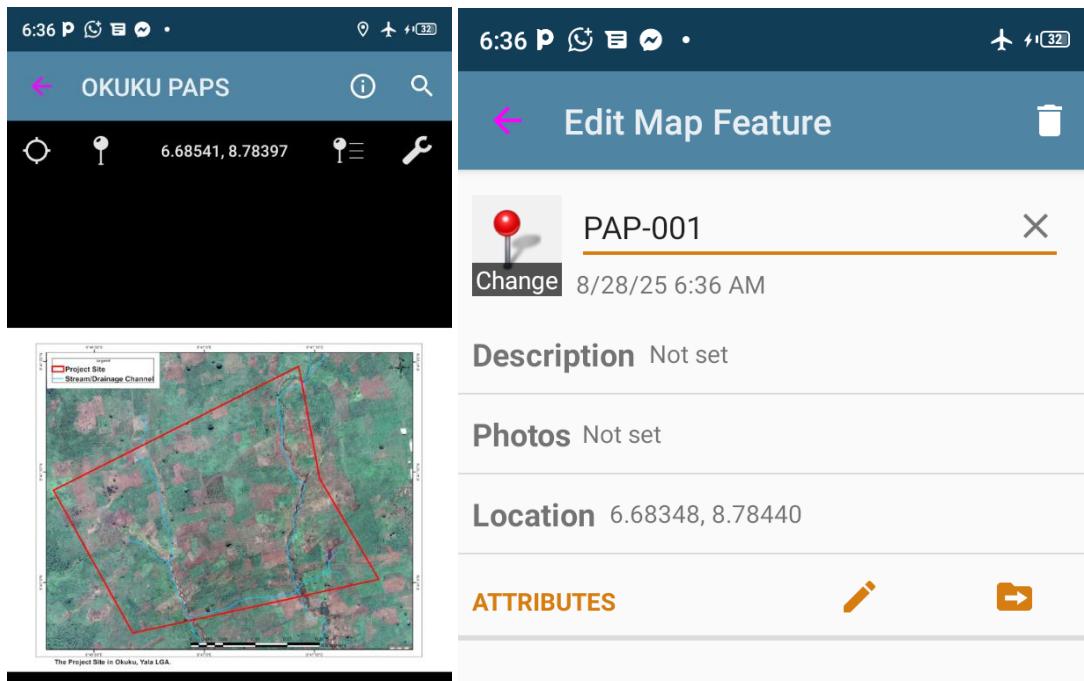


Figure 20: Screenshot of Avenza App used in the field during PAPs' enumeration exercise

ICT Approach to Data Collection

This study employed a cross-sectional survey design using **KoboToolbox**, a mobile-based data collection platform. KoboToolbox was selected for its proven reliability in field research, ability to function both online and offline, and robust data management features. The use of a digital platform reduced the risks of data loss, improved accuracy, and facilitated near real-time monitoring of field activities.

6.9 Instrument Development

A structured questionnaire was developed and digitized in KoboToolbox to capture both quantitative and qualitative information. The instrument was designed to align with the objectives of the study, covering socio-demographic variables, household characteristics, and thematic areas relevant to the project.

- **Closed-ended questions** were used to collect quantifiable data, allowing for statistical analysis.
- **Open-ended questions** captured contextual insights, perceptions, and detailed explanations from respondents.
- Built-in features such as **skip logic, range checks, and mandatory fields** were embedded to minimize errors and ensure logical consistency across responses.

The instrument underwent pre-testing with a small group of respondents to assess clarity, flow, and technical functionality within KoboCollect (the mobile data collection application). Feedback from the pre-test was incorporated to refine question wording and sequencing.

6.7 6.10 Data Collection Procedure

Enumerator Training

Enumerators were trained on the purpose of the study, ethical considerations, interview techniques, and hands-on use of KoboCollect. Special emphasis was placed on maintaining neutrality, building rapport with respondents, and handling sensitive information with confidentiality.

Fieldwork

Data collection was conducted through face-to-face interviews using mobile devices (smartphones and tablets) loaded with the KoboToolbox form. KoboCollect enabled enumerators to collect data offline in areas with poor or no network connectivity. Once internet access became available, the devices automatically synchronized with the KoboToolbox server, ensuring timely upload of completed questionnaires.

Supervision and Monitoring

Field supervisors reviewed completed forms daily, checking for accuracy and completeness. Real-time monitoring through the KoboToolbox dashboard allowed the research team to identify gaps or inconsistencies and provide immediate feedback to enumerators.

6.8 6.10.1 Data Quality Assurance

Several mechanisms ensured the reliability and validity of data collected:

- **Automated checks:** Skip patterns, mandatory questions, and data range restrictions reduced entry errors.
- **Daily review:** Data uploaded to the server were checked daily for completeness, outliers, and inconsistencies.
- **Feedback loops:** Enumerators received corrective guidance where necessary.
- **Version control:** The KoboToolbox system ensured that only the latest approved version of the questionnaire was deployed.

6.9 6.10.2 Data Analysis

The collected data were exported from KoboToolbox in standard formats (CSV, XLS) and analyzed using statistical software such as Microsoft Excel and SPSS. Descriptive statistics (frequencies, percentages, means, and standard deviations) were generated to summarize respondent characteristics and key findings. Cross-tabulations were conducted to examine relationships between variables. Qualitative responses were coded thematically to capture insights beyond numerical patterns.

The analysis emphasized both quantitative trends and qualitative explanations, providing a comprehensive understanding of the study objectives. Data visualization techniques, including charts and tables, were employed to present findings clearly and effectively.

Advantages of Using KoboToolbox

The choice of KoboToolbox offered several practical and methodological benefits:

- **Offline capability:** Enumerators could continue data collection without interruption in remote areas with poor network coverage.
- **Data accuracy:** Automated skip logic, validation rules, and required fields reduced human errors.
- **Real-time monitoring:** Supervisors tracked field progress through the Kobo dashboard.
- **Cost-effectiveness:** The use of mobile devices eliminated the need for paper-based questionnaires and manual data entry.
- **Security:** Data were encrypted and stored securely on the Kobo server, accessible only to authorized researchers.

Ethical Considerations

Informed consent was obtained verbally or in writing before each interview. Respondents were assured of anonymity and confidentiality; no identifying information was disclosed in the analysis or reporting. Participation was voluntary, and respondents retained the right to withdraw at any stage.

6.10 6.11 Method of Valuation

To ascertain the adequacy of the NTDF rates, physical market pricing technique was employed for price valuation by our team of surveyors, who discovered that the NTDF, 2024 had better going rates than the market prices. For instance, 15 tons of cassava tubers (mature) per hectare at 100,000 naira/ ton is valued at 1.5million naira as against NTDF's rate of 4million naira. The method of valuation used took into a consideration the Land Use Act, the African Development Bank's OS 5 and, most importantly, the statutory replacement cost method which is according to the dictates of the Nigerian Institution of Estate Surveyors and Valuers and whose body is empowered by law to carryout valuation. The compensation for the crops and economic trees follows the Revised Crops and Economic Trees Compensation Rates for Cross River State 2024 National Technical Development Forum on Land Administration (NTDF, 2024).

To ensure the improvement of the PAPs' livelihood, the value of each PAP's cultivated crop is considered as a cash grant for the renting and preparation of alternative land while USD 150 is earmarked for capacity building and 30% of the value of the grant is provided as assistance for in-kind subsidy and inputs (Table 40).

The livelihood restoration package was disclosed to each PAP, negotiated and agreed with them. The individual agreement forms are provided in Appendix 2.

7 STAKEHOLDER ENGAGEMENT AND PARTICIPATION

Stakeholder engagement is a central component of the LRP, ensuring that PAPs and key community actors are informed, consulted, and meaningfully involved throughout the planning, implementation, and monitoring of livelihood restoration activities. In line with the African Development Bank's Environmental and Social Safeguards Policy, this section outlines the consultations held, participation strategies, roles of local institutions, and plans for continued engagement. The influence and interest of the various stakeholders are highlighted in Table 37.

Table 37; Interest- Influence Matrix of Stakeholders

Stakeholder Group	Interest in Project	Influence on Project	Engagement Priority
Host communities	Very High (livelihood, land, jobs)	High (can enable or resist project)	Highest priority – continuous engagement
PAPs (landowners, tenants, farmers)	Very High	Medium	High priority – RAP-focused consultations
Traditional rulers & elders	High	High	Continuous, culturally appropriate engagement
Women's groups	High	Medium	Targeted programs for inclusion & livelihoods
Youth associations	High	Medium	Skills development, employment opportunities
Odukpani and Yala LGA	Medium	High	Institutional partner for local support
CRMEnv & SEPA	Medium	High	Regulatory partner, Safeguards monitoring – periodic engagement
Federal Agencies (FMEEnv)	Medium	High	Compliance engagement – periodic
Development partners (AfDB, IFAD)	Medium	High	– formal reporting
NGOs/CSOs	Medium	Medium	Strategic engagement on health & environment
Private sector investors	High	Medium	Engagement during operation phase
Vulnerable groups (PWDs, widows, etc.)	High	Low	Targeted, inclusive engagement with safeguards

7.1 Summary of Stakeholder Consultations

Extensive stakeholder consultations were carried out to ensure that the voices and concerns of PAPs and other stakeholders were incorporated into the RAP. Engagements were conducted with the following groups:

- Residents of Okuku and nearby settlements within the project area
- Traditional rulers and community leaders
- Women's groups, youth associations, and pastoralist networks
- The CRMAI
- Community-Based Organizations (CBOs) and civil society groups
- Representatives of vulnerable populations, including widows, the elderly, and persons living with disabilities

Key concerns raised during the consultations included:

- Potential loss of access to farmland and grazing routes
- Preservation of community assets and culturally significant sites
- Inclusive participation of youth and women in training and employment opportunities
- Transparency and fairness in the distribution of livelihood support
- Priority for local labour during project construction
- The need for ongoing communication and an accessible grievance redress mechanism

These consultations directly shaped the structure and content of the LRP. Insights from the community helped identify priority livelihood interventions, define vulnerable categories, and develop engagement strategies that are responsive and culturally appropriate. Table 38 highlights the key issues raised at consultations.

Table 38: Key Issues Raised by Different Stakeholders

S/N	Stakeholder Category	Method	Participants	Key Issues Raised
1.	Host community, PAPs	Town Hall	~120	Job opportunities, land loss, need for local hiring quota
2.	Farmers, Pastoralists, women's group	FGD	25	Access to markets, livelihood restoration, water quality concerns
3.	Youth association	FGD	30	Skills acquisition, security of employment, start-up support
4.	Regulators, dev. partners such as LGAs, NGOs, State Ministries	Workshop	40	Compliance with AfDB ISS, EIA Act, RAP disclosure process
5.	PAP households	KIIs	15	Fair compensation, timing of payment, cultural site protection

7.2 Role of Traditional Leaders, CSOs, and CBOs

Successful implementation of the LRP depends heavily on partnership with trusted local institutions. These actors; traditional leaders, civil society organizations (CSOs), and community-based organizations (CBOs) serve as vital links between the project team and the communities. Their involvement not only fosters transparency and inclusivity but also ensures that interventions are culturally appropriate, locally owned, and sustainable in the long term.

Traditional Leaders: The involvement of traditional leaders, chiefs, elders, and other respected community figures is central to the success of the LRP. These leaders are often the first point of contact within the community and are instrumental in mobilizing residents, validating lists of PAPs, and resolving disputes that may arise. Their influence and credibility help build trust and ensure that community members remain informed and engaged throughout the process. They also play a key role in sensitizing residents about project timelines, changes in land use, and the livelihood support opportunities available under the plan.

Civil Society and Community-Based Organizations (CSOs and CBOs): Local CSOs and CBOs will be important partners in delivering livelihood restoration activities. Their grassroots presence and familiarity with the communities make them well-positioned to support the design and delivery of practical, inclusive interventions. Specifically, their roles will include:

- Facilitating vocational and skills training in areas such as agriculture, agribusiness, and small-scale enterprise;
- Supporting the inclusion of women, youth, and other vulnerable groups to ensure no one is left behind;
- Mobilizing residents for health education, financial literacy sessions, and group-based savings schemes;
- Carrying out independent verification of project activities and leading community-level social audits to promote transparency and accountability.

Where possible, the project will engage experienced local NGOs already active in the Cross River State under formal service agreements. Their participation will help strengthen local ownership and improve the effectiveness of the RAP & LRP.

Stakeholder Consultations and Integration in the Study

Major development projects proposals have the potential to impact the socio-economic environment in several ways within and outside the project's immediate environment. Impacts could arise from perceptions of benefits, loss of assets, changes in income levels, among others. The proposed ATC project would potentially impact individuals, families and communities in the project area. Impacts would vary with different phases of the project from mobilization through construction, commissioning, operations and decommissioning. The impacts could be beneficial, adverse, negligible, significant, short term or permanent. In consideration of these impacts, it was necessary to ensure participation and integration of various stakeholders including the local

populace (community residents), non-governmental organizations, public agencies, security agencies, professional bodies, government regulators and the academia in the environmental and social studies. The integration and participation were aimed at public consultation and disclosure, data gathering and involvement of stakeholders in identifying associated and potential impacts and developing acceptable mitigation and enhancement measures. This process helped to secure a **Social License to Operate** in the communities and ensure sustainability in the proposed ATC project.

The stakeholder engagement and consultation exercises involved:

- i. Consultation with the Yala LGA chairman, Councillors, and Ipuole community leaders at Sanctus Hotels, Okuku, Yala LGA on the 26th of June, 2025.
- ii. A consultation, FGD, KII etc. meetings were held with the Ipuole community leaders, youth and women leaders on the 27th of June, 2025 at Sanctus Hotels, Okuku, Yala LGA.
- iii. Participatory data gathering using household Questionnaire administration, FGDs, and KIIs were also conducted simultaneously with Project Affected Persons (PAPs) and assets enumeration for Resettlement Action Plan (RAP) and Livelihood Restoration and Enhancement Plan (LREP) development for the project on the 27th and 28th June, 2025. The consultation meetings were useful in eliciting stakeholders' perceptions, concerns and expectations from the proposed project, Plate 14 and Plate.15. Consultation and engagement activities are continuous to provide useful feedback to ensure community integration and sustainable development during all phases of the project. Minutes of the different engagements are provided below, while attendance lists for the meetings are attached in Appendix 2.
- iv. Field consultations and engagements were also carried out with community groups, owners of assets on and around the proposed project site. The engagements provided information about stakeholders' perceptions, concerns and expectations, and preferred mitigation measures to the identified potential impacts.
- v. A Scoping and Stakeholders' Engagement Workshop was held on the 17th of June, 2025 at HOGIS Hotel, State Housing Estate, Calabar, Cross River State. The workshop was attended by the communities' leaders, residents, members of the public, the project proponent (CR-SAPZ), security agencies (including the Nigerian Navy, Department of State Security (DSS), Nigeria Security and Civil Defence Corps (NSCDC), Nigeria Police (NP), Nigeria Customs Service (NCS), regulators (Federal Ministry of Environment, NESREA), etc and the academia (Plate.15).

At the workshop an overview of the proposed project and its potential impacts was presented, and stakeholders' perceptions, concerns and suggested mitigation measures were discussed.

Table 39: Participants and Discussions at the Stakeholders' Engagements

Date	Participants	Type of Engagement	Issues Discussed and Comments
26/06/25	Yala LGA chairman, Councilors, and Ipuole community leaders at Sanctus Hotels, Okuku, Yala LGA on the 26 th of June, 2025.	Consultation/Briefing meeting on the proposed ATC project and the ESIA of the project.	<p>Consultation and briefing of Yala LGA chairman, Councillors, and Ipuole community leaders at Sanctus Hotel, Okuku, Yala LGA on the ATC project/ESIA by the E&S Team Lead, Dr. Bassey Uzodinma.</p> <p>After the opening prayers for the meeting and the introduction of the leaders of the communities and the ESIA team, Dr. Bassey Uzodinma informed the community leaders that the ESIA team was commissioned and sent by the CRS government through the CR-SAPZ programme to carry out an ESIA of the proposed ATC project to ensure the environmental and social sustainability of the project. He informed them that the coming of the ESIA team was a preliminary and consultation meeting with the LGA Chairman, Councillors and elders of the community to inform them about the project and the ESIA in the communities to obtain their permission and obtain their social licence to operate, before starting the ESIA activities in the communities.</p> <p>In his response, the Chairman, Yala LGA Dr. Fred Okem welcomed the team to Yala LG and appreciated the President Bola Tinubu, The Ministers of Agriculture and Environment, the Governor of Cross River State for siting the ATC in Yala LGA. He expressed his full support and that of his administration for the project. He informed the team that Yala people were a very friendly and hospitable people and apologized for the incident that took place when the team came the first time. He introduced Chief Ogbuole, an Ipuole Okuku community leader as the community team lead to work with ESIA. In his response Chief Ogbuole welcomed the ESIA team and apologized for the harassment and attack the team experienced the first time they came to the community. He informed the team that their action was prompted by the large number of hectares of land in different locations in the community that have been taken by various governments in the past in the name of projects development. Some these large parcels of land were fenced and later abandoned and the land cannot be used by the people for their farming activities, while some of the projects which were started remain uncompleted till today bringing no benefits to the people. He expressed the hope that the proposed ATC project will not suffer same fate. He said that they accepted and whole heartedly supported the project as it is going to</p>

Date	Participants	Type of Engagement	Issues Discussed and Comments
			bring benefits to the community. He promised to work with and assist the team to its work successfully.
27/06/25	Community leaders, youth, women leaders, fisherfolks and community members	Focused Group Discussions (FGD), Key Informant Interviews (KII), Questionnaire surveys, Community Walk and Participatory Rural Appraisal (PRA) for ground truthing by the SIA team	<p>Focused Group Discussions (FGD), Key Informant Interviews (KII), Questionnaire surveys, Community Walk and Participatory Rural Appraisal (PRA) for ground truthing by the SIA team.</p> <p>FGD and KII were held with leaders of Ipuole Okuku village at the Sanctus hotel where the people were briefed about the ATC project and the ESIA. The people welcomed the project and indicated their support for the project as they expected the project to bring many benefits to the communities. However, they voiced their concerns about possible marginalization of their people in employment, inadequacy of the quantum of compensation, delay in payment of compensation and the fear of abandonment of the project as experienced with many projects in the past in the communities etc. The team lead for the Social Impact Assessment (SIA) Dr. Malachi Abasiiodiong assured them that the ATC project will be a completed, successful, functional and sustainable project for the benefit of the community, LGA, the State and the nation at large.</p> <p>Household questionnaires were administered to heads of households in the community and relevant baseline data and information were obtained for the SIA.</p>
17/06/25	Community Leaders and Representatives Ipuole Okuku, Public, Regulators, Representatives Cross River State Government Ministries, Professional Associations, Security Services and the Academia	Scoping and Stakeholder Engagement workshop	Presentation of the proposed project and the ESIA studies. Proposed project design, scope and potential impacts. Regulatory requirements (Federal and Cross River State Governments). Traffic and Security, Perceptions, concerns, expectations, potential impacts, mitigation and enhancement measures.

Source: PGM Survey, 2025

Stakeholder Perceptions, Concerns and Expectations

The proposed project is expected to facilitate economic activities and boost employment in the area. Several stakeholders were identified and engaged. They generally perceived the project is developmental and will benefit residents, businesses and the community, LGA and the state. However, some concerns and expectations were expressed as follows:

7.2.1.1 Community Concerns

The Community's concerns include:

- Loss of land - the proposed project will take 37.837 hectares of land from the community.
- Fear of inadequate compensation and delay in payment
- Neglect of our people in employment opportunities in the ATC
- insecurity that may be occasioned by the influx of job seekers into the communities.
- Population explosion and congestion in the communities
- Waste disposal problems as there are no wastes management facilities in the communities
- Project non-completion and abandonment as happened with many projects in the past.
- Loss of dwelling and commercial buildings around the proposed project site
- Increased flooding of parts of the community during the wet season if provision is not made for adequate drains along the road.
- Movement in the community will be impaired for pedestrians during construction.
- Distribution of benefits like employment during construction phase could cause problems and agitations in the community if not properly managed.
- Movement of construction vehicles and equipment would cause dust and air pollution, road blocks, traffic congestion and accidents.
- Construction activities will cause vibrations that would affect foundations and walls of buildings.

7.2.1.2 Concerns of the National Union of Road Transport Workers and the Federal Road Safety Commission (FRSC)

- Project construction will lead to blockage of sections of the road, traffic congestion and diversion. This will make movement within the communities cumbersome for residents.
- Provision of adequate and safe diversions along the roads to take care of vehicular movements during proposed project construction phase.
- Rehabilitation of roads intended to be used as diversions prior to commencement of the proposed project.

- On completion there will be increased vehicular traffic which would be potentially hazardous for physically challenged residents, children and other community residents. There is a need to protect them from fast moving vehicles while they carry out their normal activities in the communities.
- Provision of adequate road diversions during project construction phase.
- Rehabilitation of roads intended for use as diversions so that vehicles will have minimal damage plying the routes.
- Provision of speed breaks and road signage on portions of the ring road.

7.2.1.3 Expectations and Requests of the Project Host communities

- Employment of members of the communities especially youth and women in skilled and unskilled positions during construction and operational phases of the project.
- Signing of Memorandum of Understanding (MOU) or Community Development Agreement (CDA) with the Community by the project proponents.
- Appointment of liaison officer from the project impacted community.
- Prompt payment of adequate compensation to residents whose properties example crops and other assets will be affected by the proposed project.
- Provision of infrastructural amenities to the community viz: potable water supply, educational facilities, improved healthcare facilities, skills acquisition centre,
- provision of tarred roads in the community to link and open up the communities
- provision of low interest loans and grants to indigent members of the community for business start-up and expansion
- award of contracts to indigenes of the community,
- local sourcing of available raw materials from the community etc.
- Introduction of pedestrian bridges, zebra crossings and speed breaks along the road, especially where the road passes through built up areas in the community.
- Construction of deep drains along the roads to prevent flooding in the community.



Plate 14: Consultation meeting on 27.06.2025 at Sanctus Hotel, Okuku with Ipuole Okuku community elders, youth and women leaders (left); FGD with community elders, youth and women leaders (Middle left); FGD with community women (Middle right); and Key Informant



Plate.15: Cross sections of participants at stakeholders engagement / scoping workshops (top left), the FMEnv. Rep making addressing the workshop, surrounded by the Clan Head of Okuku, the Chairman of Yala LGA and a rep of Clan Head of Adiabo (top middle), and top right, reps of the Nigerian Navy, NSCDC, Customs, among other participants



Plate 16: Consultation Meeting with the Chairman, Yala LGA, Councilors, Ipuole Okuku

7.3 Plan for Continued Engagement

Sustained stakeholder engagement is important to the success and long-term impact of the LRP. Beyond initial consultations, the project will institutionalize a system of regular communication, partnership, and feedback that ensures communities remain informed, involved, and empowered throughout implementation. To achieve this, the following measures will be put in place:

- Quarterly stakeholder review forums will be convened by the CR-SAPZ Project Implementation Unit (PIU) in the project area. These sessions will provide a platform for updates, progress review, and open dialogue between project stakeholders, including community members and local authorities.
- Community Liaison Officers (CLOs) will be deployed to act as direct points of contact between the community and the project team. CLOs will play a key role in coordinating day-to-day communication, gathering feedback, and addressing minor grievances quickly and locally.

Through these aforementioned mechanisms, the CR-SAPZ PIU, working closely with CRMAI and other implementing partners, will ensure that engagement is not treated as a one-off activity, but as an ongoing relationship. This approach is critical to fostering local ownership, enhancing accountability, and promoting inclusive development throughout the life of the RAP.

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8 BUDGET AND FINANCING

The budget for implementing the LRP has been developed based on detailed cost estimates for each proposed intervention across the project-affected communities. It captures the full cost of activities such as training, input provision, enterprise development, monitoring and evaluation, grievance redress, institutional capacity strengthening, and includes provisions for contingencies and inflation adjustments. This budget forms part of the Environmental and Social Safeguards (ESS) component under the Special Agro-Industrial Processing Zone (SAPZ) program and is subject to review and approval by the African Development Bank (AfDB) and the Federal Ministry of Agriculture and Food Security (FMAFS), through the CR-SAPZ Project Implementation Unit (PIU).

8.1 8.1 Funding Sources and Disbursement Arrangements

The LRP will be funded primarily through the African Development Bank (AfDB), as part of its financing of the SAPZ Phase I intervention in the Cross River State. Disbursement and financial oversight will be managed by the CR-SAPZ Project Implementation Unit (PIU) under the supervision of FMAFS and in alignment with AfDB procurement and financial management guidelines.

Disbursement will be made directly to PAPs

One RAP/ LRP implementation consultant will be engaged and supervised by the PIU Funds will be transferred directly to service providers, cooperatives, or financial intermediaries (e.g., microfinance institutions) depending on the delivery channel. Adequate documentation and verification by the PIU's finance team will precede each disbursement.

Detailed procedure for compensation will include

Step1: Claims and claimants' confirmation. This is to ensure that the particulars of the claimants and claims are verified and updated, prior to payments, making sure that all PAPs have their bank details updated and assistance given to those without to open accounts that will accommodate the volume of the entitlements, at no cost to them.

Step 2: Disbursement of the LRP package- The entitlements shall be disbursed through cheques to the PAPs. Pictures will also be taken of the PAPs at the point of collection of the cheques and witnessed by an appointed community representative and witness. The PAP will be required to sign an indemnity form, to indemnify the CRSAPZ and its agents responsible for the RAP/ LRP Implementation.

Step 3: Monitoring and Evaluation to follow up the PAPs

Step 4: Completion Audit/ Closure at the end of the third year to ensure complete enhancement/ restoration.

Table 40: LRP Implementation Budget Breakdown

Category	Intervention	Cost (₦)	Cost (\$)
Training and Vocational Programs	Skills development for farmers, youth & women	35,615,590	22,977.80
	Business management and financial literacy training		
Agricultural and Livelihood Support	Business advisory and mentoring		
	Provision of tools		
	Extension services and demo plots		
Microenterprise and SME Support (To compensate for loss of crops and livelihood)	Grants and input support for start-ups/cooperatives (value of cultivated crops)	34,384,410	22,183
Grievance Redress Mechanism (GRM)	Grievance Management	3,000,000	1,935.48
NGO Participation	Logistics for NGO Witnessing	2,000.000	1,290.32
Administration	Allowance for bank charges, stamp duty and other logistics for implementation	15,000.000	9,677.42
Total Estimated Cost		70,000,000	45,161

8.2 8.2 Institutional Frameworks

This section provides details on the relevant institutions and stakeholders that will be involved in the implementation of the RAP, including their roles and responsibilities. The implementation arrangements of the RAP exist within the following structures:

- The institutional arrangements for the ATC Project; and
- The institutional arrangements for resettlement and compensation activities in line with laws of the Federal Republic of Nigeria; and applicable International Standards outlined in this document.

All identified stakeholders and actors – state and non-state, involved in both these sets of institutional arrangements would be considered in the implementation of the resettlement and compensation activities for the project.

Table 41 describes the institutions relevant to the design and implementation of the RAP at the national, state and local levels in Nigeria.

Table 41: Institutional Framework for ATC RAP Implementation.

Designation	Institution	Mandate	Role on the RAP
Project Financier	African Development Bank	Arrange financing for the project from the combination of several national and international banks and lending institutions.	The project financier will oversee the implementation of the RAPs in compliance with stated financier guidelines
Project Proponent	CR-SAPZ	Responsible for providing a system for moving people and goods within and outside the count	The CR-SAPZ will coordinate and oversee the project from the conceptualisation stage to the operational phase. The ministry will be responsible for ensuring the RAPs are implemented in line with national standards and also monitoring and evaluation of the resettlement process.
Project Consultant	ESIC	Responsible for guiding the project proponent on the Resettlement plan of the project, ensuring it is in compliance with international best practice	Development of the RF and Resettlement Action Plans Disclosure of the RAP/ LRP to all stakeholders Delivery of the LRP packages to the PAPs M&E to ensure all PAPs have their livelihood's enhanced or at the least, restored Report the progress of the LRP implementation to CR-SAPZ, AfDB, and other designated authorities.
Regulatory Body	Federal Ministry of Environment	The Federal Ministry of Environment is responsible for drafting policies and enforcing regulations on environmental protection. The FMEnv ensures every development project abides to the Environmental Impact Assessment Act CAP E12 LFN 2004 which identifies the need to develop a RAP for project affected persons.	The Ministry will work with the CR-SAPZ and other Ministries, Departments and Agencies (MDAs) to ensure the RAP is implemented in compliance with national and international best practices. The Ministry will be available to handle possible environmental issues encountered with respect to the RAP.
Key State / Institutions	Ministry of Lands / CRGIA	The Ministry is responsible for land management, processing land applications, allocating land for purchase to citizens, valuation of land, collection of revenues such as land use charge, resolving complaints and disputes on land and developing land governing policies in the state	Enumeration and valuation of affected lands and crops. Calculation of compensation rates Monitoring the payment of compensation Prepare Certificates of Occupancy to resettled PAPs Monitoring and Evaluation of the RAP activities Support the management of land related grievances
	CR Ministry of Justice	Ministry of Justice is responsible for providing legal representation to the state	The Ministry will be the arbitrator to resolve grievances arising from the project or from the Project Affected Persons (PAPs) who are not

Designation	Institution	Mandate	Role on the RAP
		government and legal services to the citizen of the state. The ministry resolves disputes, enacts legislation, prosecute law offenders and other judicial issues in the state	pleased with the resolution of the CRC and RMC.
	Traditional Authority	The traditional authority is vital in the successful completion of each phase of a project which includes the resettlement process. The traditional leadership in the communities is the Clan Council.	They will be the first respondent to address grievances on land issues and compensation; The traditional leaders will act as an intermediary between the people and the CRC. Ensure community participation by mobilising and sensitising community members They will ensure there is peace and conformity to law in the affected communities.

Note: All costs are indicative and subject to final review, procurement planning, and possible adjustment due to exchange rate fluctuations or changes in implementation timelines. For this estimate, an exchange rate of **₦1,550 to 1 USD** was used as a reference.

8.3 RAP Implementation Schedule

The compensation payment part of the RAP implementation shall be completed before land take over. It is envisaged that it can be completed within a period of six (6) months. It is important that all structures to be rebuilt and payments for compensation are completed before project construction is commenced. This can be done progressively so construction can start on one end.

The monitoring and evaluation activities which are scheduled to be done once a year, shall commence 6 months after completion of compensation payments (Figure 21).

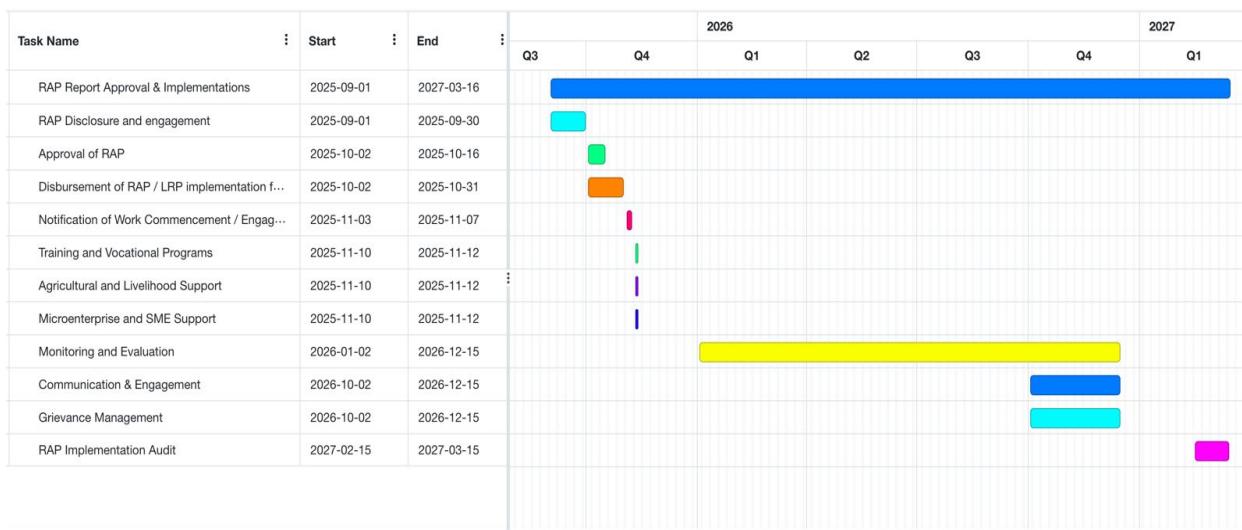


Figure 21: RAP/LRP Implementation Schedule

9 MONITORING, REVIEW AND EVALUATION

The purpose of resettlement monitoring is to ensure that measures developed for compensating the losses were effective in restoring PAPs living standards and income levels. Monitoring will be implemented by the PIU.

During monitoring phase, the existing grievance mechanism will be regularly reviewed for improving and correspondingly, additional and more user-friendly forms, which enable the field staff to forward complaints and demands of local people to the PIU.

Throughout the Project lifecycle, monitoring and evaluation activities will be reviewed; restructured or removed in case that the previously produced tools and forms are inefficient.

Monitoring and Evaluation (M&E) procedures establish the effectiveness of all land and asset acquisition and resettlement activities, in addition to the measures designed to mitigate adverse social impacts. The procedures include internal track keeping efforts as well as independent external monitoring.

The purpose of resettlement monitoring for the proposed ATC project will be to verify that:

- Actions and commitments described in the RAP are implemented;
- Eligible project affected people receive their full compensation prior to the start of the rehabilitation activities on the corridor;
- RAP actions and compensation measures have helped the people who sought cash compensation in restoring their lost incomes and in sustaining/improving pre-project living standards;
- Complaints and grievances lodged by project affected people are followed up and, where necessary, appropriate corrective actions are taken; and
- If necessary, changes in RAP procedure are made to improve delivery of entitlements to project affected people.

The African Development Bank operational safeguards (OS 5) states that the project proponent (CR-SAPZ) is responsible for adequate M&E of the activities set forth in the resettlement instrument.

Monitoring will provide both a warning system for the PIU and the project proponent (CR-SAPZ) and a channel for the affected persons to make known their needs and their reactions to resettlement execution.

PIU monitoring and evaluation activities and programs shall be adequately funded and staffed. PIU monitoring will be verified by the witness NGO to ensure complete and objective information.

9.1 9.1 Monitoring Framework

The purpose of resettlement monitoring will be to ensure that compensation measures were effective in restoring PAPs living standards and income levels.

Also, the effectiveness of the grievance mechanism provided will be followed up. As part of the monitoring and evaluation process, changes in RAP procedures will be put into effect if necessary.

The monitoring and evaluation framework consist of three elements:

- Internal monitoring by PIU+ RIC
- External monitoring undertaken by the Witness NGO; and
- Independent RAP Completion Audit.

Indicators have been established in order to measure RAP activities, results, objectives and goals. There are five categories of indicators for performance monitoring.

The first three (3) Internal Performance Monitoring are: input, output and process indicators.

They are mostly used for medium term measures to ensure that the RAP is relevant, effective and efficient.

The last two Impact monitoring are: outcome and impact indicators. They are mostly used for long term measures for assessing the results.

Table 42: RAP Monitoring Framework

Component Activity	Type of Information/ Data Collected	Source of Information/ Data Collections Methods	Responsibility For Data Collection, Analyses And Reporting	Frequency/ Audience of Reporting
Internal Performance Monitoring	Measurement of input, process, output and outcome indicators against proposed timeline and budget, including compensation disbursement	Quarterly narrative status and compensation disbursement reports	PIU team, including public relations representatives	Semi-annual or as required by CR-SAPZ Environmental Unit and AfDB
Impact Monitoring	Tracking effectiveness of inputs against baseline indicators. Assessment of affected people's satisfaction with inputs, processes and outputs.	Annual quantitative and qualitative surveys. Regular public meetings and other consultation with project affected people; review of grievance mechanism outputs.	PIU team, including public affairs representatives Witness NGO	Annual

9.2 9.2 Internal Performance Monitoring

Measurement of input, process, output and outcome indicators against proposed timeline and budget, including compensation disbursement

- Quarterly narrative status and compensation disbursement reports
- PIU team, including public relations representatives
- Semi-annual or as required by CR-SAPZ Environmental Unit

9.3 Impact Monitoring

The project's resettlement impacts are monitored to:

- Track effectiveness of inputs against baseline indicators
- Assess of affected people's satisfaction with inputs, processes and outputs.

This monitoring is conducted through

- Annual quantitative and qualitative surveys.
- Regular public meetings and other consultation with project affected people;
- review of grievance mechanism outputs.

PIU team, including public affairs representatives Witness NGO.

In order to effectively report on the effectiveness of RAP implementation, PIU will monitor the following key indicators, in keeping with AfDB requirements on involuntary resettlement:

- The timely and adequate disbursement of compensation;
- Compensation disbursement to the correct parties;
- Public consultation and grievance procedures in place and functioning;
- The physical progress of resettlement and rehabilitation, where applicable.

PIU monitoring will provide the RAP management team with feedback on RAP implementation and help ensure that adverse impacts on affected people are mitigated in a timely manner. M&E will be the main mechanism to alert management of any delays and problems and will help CR-SAPZ measure the extent to which the main objectives of the resettlement plan have been achieved.

RAP monitoring and evaluation activities will be adequately funded, implemented by qualified specialists and integrated into the overall RAP implementation budget.

PIU monitoring and evaluation activities will be supplemented and verified by monitoring efforts of the witness NGO.

The establishment of appropriate indicators in the RAP is essential since what is measured is what will be considered important. Indicators will be created for affected people as a whole, for key stakeholder groups, and for special categories of affected groups such as women.

The most important indicators for the RAP in the near-term concern outputs, processes and outcomes since they define whether the planned level of effort is being made and whether early implementation experience is being used to modify/redesign RAP features. Over the medium to long term, outcome and impact indicators are critical since they are the ultimate measure of the RAP's effectiveness in restoring people's livelihoods.

Monitoring indicators may have to be defined or re-defined during the course of project in response to changes to project-related conditions. Consequently, implementation and mitigation measures may have to be adopted to incorporate these changes into the M&E plan.

9.4 9.3 Indicators

Input Indicators

These cover the human and financial resources that are utilized in the RAP activities.

Output Indicators

Include activities and services produced with the inputs, which can be a database of land acquisition, Compensation payments made for the loss of assets etc.

Process Indicators

Process indicators represent the change in the quality and quantity of access and coverage of the activities and services. Examples of process indicators in the RAP include:

- The creation of grievance mechanisms;
- The establishment of stakeholder channels so that they can participate in RAP implementation;
- Information and dissemination activities.

Outcome Indicators

The delivery of mitigation activities and measures to compensate physical and economic losses created by the project such as restoration and compensation of agricultural production and overall income levels, changes in PAPs and community attitudes towards the project, use of compensation payments for income generating activities.

Impact Indicators

Impact indicators define the change in medium and long-term measurable results in behavior and attitudes, living standards, and conditions. Impact indicators aim to assess whether restoration activities of the RAP are effective in maintaining and even improving social and economic conditions of PAPs.

In addition to quantitative indicators, impact monitoring will be supplemented by the use of qualitative indicators to assess client satisfaction and the satisfaction of the affected people with the choices that they have made in re-establishing themselves.

Tracking this data will allow PIU determine the following types of information:

- The extent to which quality of life and livelihood has been restored;
- The success of the resettlement; and
- Whether Project Affected Persons have experienced any hardship as a result of the project.

9.4 Internal Monitoring

Internal monitoring measures the progress of activities defined in the RAP. The PIU will be responsible for this process with support from appointed experts as necessary.

It is the responsibility of the PIU to conduct regular internal monitoring of the resettlement efforts and performance of the operation through LRC and grievances committee which will be responsible for implementing resettlement activities and manage grievances. The monitoring shall be a systematic evaluation of the activities of the operation in relation to the specified criteria of the condition of approval.

Objectives of Internal Monitoring & Evaluation

The objective of internal monitoring and supervision shall be:

- To verify that the valuation of assets lost or damaged, and the provision of relocation, resettlement and other rehabilitation entitlements, has been carried out in accordance with the resettlement policies;
- To oversee that the RAP is implemented as designed and approved;
- To verify that funds for implementation of the RAP are provided by the CR-SAPZ in a timely manner and in amounts sufficient for their purposes, and that such funds are used in accordance with the provisions of the RAP;
- Ensure the identification and signature/thumb print of PAPs before and during receipt of compensation entitlements; and
- Record all grievances and their resolutions, and ensure that complaints are dealt with in a timely manner.

9.5 External Monitoring and Evaluation

External monitoring activities will verify the process defined in the RAP which is realized by PIU.

The witness NGO shall be empowered to periodically carry out external monitoring and evaluation of the implementation of the RAP. The general objectives for external monitoring are:

- To provide an independent source of evaluation during the implementation process of resettlement and compensation. The external monitor will offer, if needed, external support and technical expertise to RAP compensation committees and implementing agencies;
- To contribute advice to solve both anticipated and unanticipated problems that may arise as the programs defined in this RAP are carried out; and
- To provide an overall assessment of RAP programs from a broader, long-term socio-economic perspective.

- The following parameters will be monitored and evaluated through PIU reports and sites visits:
 - Public consultation and awareness efforts of compensation distribution;
 - PAPs shall be fully informed and consulted about on all resettlement activities, including land acquisition, leasing land and relocation activities, if any;
 - The witness NGO representative shall attend some public meeting to monitor consultation procedures, problems and issues arisen during the meetings and solutions proposed;
 - Levels of PAPs satisfaction with various aspects of resettlement and compensation will be monitored and recorded;
 - Operation of grievance redress mechanism, redress results, and effectiveness of grievance resolution will be monitored;
 - Standards of Living - throughout resettlement implementation process, the trends of living standards of PAPs will be observed and surveyed, and any potential problems in restoration of living standards will be recorded and reported.
 - The witness NGO shall have qualified and experienced staff and their terms of reference acceptable to the financing AfDB.
 - In addition to verifying the information furnished in the internal supervision and monitoring reports, the independent monitoring unit shall visit a sample of 10% of PAPs in each relevant district, six (6) months after the RAP has been implemented to:
 - Determine whether the procedures for PAPs participation and delivery of compensation and other rehabilitation entitlements have been done in accordance with the Policy Framework and the respective RAP;
 - Assess if the RAP objective or enhancement or at least restoration of living standards and income levels of PAPs have been met;
 - Gather qualitative indications of the social and economic impact of project implementation on the PAPs; and
 - Suggest modification in the implementation procedures of the RAP, as the case may be, to achieve the principles and objectives of this policy framework.

Both internal and external monitoring programs will be ended with RAP Completion Audit.

9.6 RAP Completion Audit

A RAP completion audit will be undertaken when previous monitoring has indicated that there is no significant outstanding issue regarding livelihood restoration and resettlement. It is expected that this final audit will be performed 3 years after the resettlement at the latest.

The RAP completion audit will be undertaken by an accredited agent with support from PIU and CR-SAPZ as required.

The RAP completion audit will provide final indication that the livelihood restoration is sustainable and no further interventions are required.

Therefore, the independent audit assessing compliance programs resettlement / compensation with the provisions described in the RAP, the Nigerian legal framework applicable and the requirements of World Bank/AfDB. The evaluation report will be made public through the PIU, LRC meeting and public announcement through appropriate media.

9.7 Reporting

RAP monitoring reports will be prepared in accordance with AfDB guidelines. Progress will be reported for the following tasks:

- Internal monitoring;
- External monitoring;
- Compensation;
- Completion audit.

The PIU team will have primary responsibility for the implementation of all internal monitoring activities. Designated staff will collect relevant data in a standardized format. PIU will use a device such as a bar chart/Gantt chart or Microsoft Project table to assess and present information on progress of time bound actions.

9.7.1.1 Frequency/Audience of Reporting

Monthly performance monitoring reports will be prepared by the RIC for the PIU, beginning with the commencement of any activities related to resettlement, and /or including income restoration.

These reports will summarize information that is collected and compiled in the quarterly narrative status and compensation disbursement reports and highlight key issues that have arisen.

As a result of the monitoring of inputs, processes, outputs and outcomes of RAP activities, project management will be advised of necessary improvements in the implementation of the RAP.

9.7.1.2 Type Of Information/Data Collected

In order to measure the project process and impact performance and to assess the effectiveness of project impact mitigation measures, PIU will collect information on all the input, process outcome and impact indicators.

Impact monitoring data will be collected at appropriate intervals through qualitative and quantitative surveys, and include a review of grievance mechanism outputs. The PIU will consult directly with the affected populations through regular public and LRC meetings.

Monitoring data will be reported to the PIU and relevant external agencies quarterly or more frequently as required. The monitoring will continue for about 2 years beyond the completion of displacement process.

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APPENDICES

Appendix 1: 2024 NTDF Compensation Rates for Crops & Economic Trees

<https://dl.ubuoffice.com/wl/?id=NrX74an6UtnUIk61u4kakKuAqDSbK2yY>

Appendix 2: PAPs' Individual Agreement Forms

Appendix 3: Consultation meetings attendance registers

<http://dl.ubuoffice.com/wl/?id=WGgT6foMOFeky9vcQSqePDTUrcb7rF1N>

Appendix 4: Grievance Lodgement Form Grievance Lodgement Form

Location	
Name of Contractor	
GR Number	

A. COMPLAINANT DETAILS

Name	
Address	
Phone	
Email	
Date of Submission	

Representing a Group/Community?

Name:	
Role/Title:	
Phone:	

B. GRIEVANCE DESCRIPTION/NATURE OF COMPLAINT

(Briefly describe your concern/complaint - issue, location, impact, and desired resolution/prayer):

Consent & Undertaking

By signing this form, I:

1. I am choosing to send this complaint to the GRM team so they can help resolve it.
2. Agree to cooperate with the GRM process, including providing necessary information/facts and attending meetings/discussions, if required.
3. Accept the GRM team's authority to investigate, mediate, verify, and decide on a fair resolution of my complaint.
4. The GRM team can share my information and complaint with necessary parties without violating my privacy or compromising confidentiality requirements and legal limits.
5. Commit to abide by the decision of the GRM team, but I still have my right to use other legal options.
6. Understand that false or malicious complaints may disqualify my complaint.

Complainant's Signature:

Date:

Illiterate Complainant (Protection) Protocol

The contents of this form were read and interpreted to the Complainant in language by and the Complainant understood and voluntarily affixed his thumbprint as a mark of consent before:

Complainant Thumbprint:

1. Witness Name & Signature:

2. Witness Name & Signature:

Certified by:

GRM Officer's Name:

Signature:

Date:

Appendix 5: Schedule of PAPs

Attached separately



ATC Okuku (ATC)
Schedule of PAPs for |