

SEP

STAKEHOLDER ENGAGEMENT PLAN

BY



CR-SAPZ

CROSS RIVER-SPECIAL AGRO-INDUSTRIAL PROCESSING ZONE PROGRAM

August, 2025



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ABBREVIATIONS & ACRONYMS

Acronym	Full Meaning
%	Percent
' (minute)	minutes (geographic coordinates)
'' (second)	seconds (geographic coordinates)
° (degree)	degrees (geographic coordinates)
24x7	24 hours a day, 7 days a week (operating time)
AoI	Area of Influence
CSO	Civil Society Organization
FGD	Focus Group Discussion
FPIC	Free, Prior and Informed Consultation
GIS	Geographic Information System
ha	Hectare
HACCP	Hazard Analysis and Critical Control Points
ICT	Information and Communication Technology
IFC	International Finance Corporation
ISS	Integrated Safeguards System
KII	Key Informant Interview
KLD	kilo litres per day
km	Kilometre
KPI	Key Performance Indicator
kV	Kilovolt
kVA	kilo volt-ampere
m	metre
M&E	Monitoring and Evaluation
m ²	square metre
m ³	cubic metre
m ³ /hr	cubic metre per hour (flow rate)
MCA	Multi-Criteria Analysis
mm	millimetre
mt/ha	metric tons per hectare
MVA	mega volt-ampere (power demand/load)
NAFDAC	National Agency for Food and Drug Administration and Control
NESREA	National Environmental Standards and Regulations Enforcement Agency
NGO	Non-Governmental Organization
Nos	number of units/items
NSCDC	Nigeria Security and Civil Defence Corps
OHS	Occupational Health and Safety
OHS	Occupational Health and Safety
PS	Performance Standards
PWD	Persons with Disabilities
RAP	Resettlement Action Plan
Rmt	running metre
SDG	Sustainable Development Goals

Acronym	Full Meaning
SON	Standards Organisation of Nigeria
SqM	square metre (alternative notation used in tables)
ton	metric ton
USD	United States Dollar
WCs	water closets (toilets)

EXECUTIVE SUMMARY

The Stakeholder Engagement Plan (SEP) has been developed for the Cross-River State Special Agro-Industrial Processing Zone (CR-SAPZ) Program and the proposed Agro-Industrial Hub (AIH) at Adiabo, Odukpani LGA, and Agricultural Transformation Centre (ATC) at Okuku, Yala LGA in Cross River State. The SEP outlines the framework for inclusive, transparent, and sustained communication with stakeholders throughout the project lifecycle. Developed under the Cross-River State Special Agro-Industrial Processing Zone (CR-SAPZ) Program, and supported by the African Development Bank (AfDB), the SEP reflects national and international best practices for engaging communities, government, development partners, and the private sector. It responds to the Federal Government's strategy to accelerate agro-industrialization, diversify the economy, and create sustainable rural livelihoods through modern infrastructure, value addition, and market access for key crops such as cassava, rice, and cocoa.

The Federal Government's SAPZ initiative seeks to accelerate agro-industrialization, diversify the economy beyond crude oil, and address systemic constraints in agricultural value chains. Cross River State is a pioneer participant in the first phase, with the AIH at Adiabo and ATC at Okuku serving as regional hubs for value addition in cassava, rice, cocoa, and other commodities. These hubs will integrate production, processing, and marketing within modern industrial clusters supported by world-class infrastructure. The selection of both sites followed a Geographic Information Systems (GIS) and Multi-Criteria Analysis (MCA) process assessing land suitability, accessibility, market proximity, topography, and security. Adiabo was selected for its strategic road connectivity and agricultural suitability, while Okuku was chosen for its proximity to markets, favourable terrain, and security profile.

The SEP also highlights the project's socioeconomic, environmental, and investor benefits. For communities, these include improved security, infrastructure, employment, skills development, market access, and reduced post-harvest losses. For government, the project will improve the business environment, attract investment, and support policy goals in agriculture and rural development. Investors benefit from shared, world-class infrastructure, reduced operational costs, favorable lease terms, and potential tax incentives. Sustainability considerations are embedded in the project's design, from conserving green areas and promoting carbon sequestration to

implementing climate-smart infrastructure and CSR programs. Social desirability is reinforced through inclusive hiring, training, and targeted support for vulnerable groups.

The AIH occupies 130 hectares of communal land donated by the Adiabo Clan, positioned along Tinapa–Adiabo Road near educational institutions, a power sub-station, and a tributary of the Cross River. It will host commodity processing centres, cold storage, warehouses, industrial zones, vocational training facilities, administrative offices, residential quarters, green conservation areas, and comprehensive utilities. The ATC spans 37.8 hectares of state-owned land in Okuku, previously cultivated by local farmers, and will offer shared infrastructure for up to 11 agro-industries, alongside a refurbished state-owned rice mill. Both sites will feature perimeter fencing, access roads, drainage, power supply, boreholes, sewage and effluent treatment plants, solid waste management facilities, and recreational spaces. Construction is planned for 18 months following a four-month design period, with a five-year operation and maintenance phase.

The project activities such as land acquisition, resettlement, environmental protection, local employment quotas, market access, skills training, improved road and water infrastructure for the construction of AIH and ATC have triggered the need for stakeholder engagement.

The SEP applies across four project phases: pre-construction, construction, operation, and decommissioning. It seeks to comply with Nigerian laws such as the Environmental Impact Assessment Act (mandating ESIA studies and public participation), Land Use Act (governing acquisition and compensation), Labour Act (ensuring worker rights and non-discrimination), and Freedom of Information Act (supporting transparency). At state level, oversight is provided by the Cross River State Ministry of Environment, the State Environmental Protection Agency, and relevant local councils. Internationally, the project complies with AfDB Integrated Safeguards System, IFC Performance Standards, and the Equator Principles, and supports Sustainable Development Goals on poverty reduction, food security, economic growth, and industrial innovation. The CR-SAPZ Project Implementation Unit (PIU) coordinates engagement with federal, state, and local government agencies, development partners, contractors, and host communities.

Stakeholder mapping identified three categories: Primary stakeholders – directly affected communities (Adiabo Ikot Mbo Otu, Adiabo Esine Ufot, and Ipuole Okuku), project-affected persons (PAPs), women’s cooperatives, youth associations, and vulnerable groups (widows, elderly, PWDs, landless labourers). Secondary stakeholders – regulatory agencies, development partners, local government councils, and private sector actors. Tertiary stakeholders – NGOs, civil society, academic institutions, and media organisations. An interest–influence analysis prioritises high-influence, high-interest actors such as host communities, regulators, and AfDB for continuous engagement, while ensuring vulnerable groups receive targeted support and participation opportunities.

Preliminary consultations during the ESIA stage (May–June 2025) included town halls, focus group discussions, key informant interviews, workshops, and socio-economic surveys. Stakeholders raised expectations for local employment quotas, fair compensation, market access, skills training, improved road and water infrastructure, and environmental protection measures. Lessons learned emphasise the importance of early engagement, countering misinformation, ensuring gender inclusion, and aligning with AfDB safeguards and national EIA regulations.

The SEP is guided by transparency, inclusiveness, free prior and informed consultation, cultural appropriateness, two-way dialogue, conflict sensitivity, and continuous engagement. Objectives include identifying all relevant stakeholders, enabling active participation in decision-making, facilitating timely information sharing, ensuring grievances are addressed effectively, and building trust to minimise resistance while maximising benefits.

The engagement strategy is designed for each phase of the project. Pre-construction focuses on awareness and disclosure of ESIA and RAP findings, capacity-building for community representatives, and establishing grievance channels. The construction phase emphasizes regular updates, impact management, safety training, and ongoing dialogue with PAPs. During operation, the focus shifts to bi-annual stakeholder forums, disclosure of monitoring reports, and long-term partnerships for social programs. The decommissioning phase will address closure planning, infrastructure handover, and legacy management. A mix of engagement tools community meetings, focus groups, local media, printed materials, social media, and liaison offices will ensure inclusivity and reach.

Information disclosure is a core component, ensuring all stakeholders have access to accurate, timely, and accessible information. Technical documents such as ESIA, ESMP, RAP, and SEP will be shared alongside operational updates, CSR activities, and grievance procedures. Communication channels will be adapted for different audiences, including local languages and accessible formats for vulnerable groups. Monitoring disclosure effectiveness will involve surveys, meeting attendance records, and third-party reviews.

The CR-SAPZ PIU is the lead body for SEP implementation, supported by federal and state ministries, local councils, contractors, development partners, CLOs, and independent monitors. Monitoring and evaluation focus on engagement coverage, grievance resolution timelines, stakeholder satisfaction, and compliance with safeguard commitments, with results feeding into adaptive management. It assigns the Project Implementation Unit (PIU) overall responsibility for coordinating stakeholder engagement, supported by federal and state ministries, local government authorities, contractors, development partners and Community Liaison Officers (CLOs). The section defines how each actor contributes to information disclosure, consultation, grievance redress, monitoring and reporting, and capacity building. It also underscores the need for adequate human, financial and technical resources to sustain these activities. By clearly delineating roles and responsibilities, Section 9 provides a structured approach that promotes accountability, consistency and effective communication with all stakeholder groups from pre-construction through decommissioning.

The SEP outlines a structured Grievance Redress Mechanism designed to ensure that concerns, complaints, and disputes from stakeholders are received, addressed, and resolved promptly, transparently, and fairly. The GRM operates at multiple levels — starting with the Community Liaison Officer (CLO) as the first point of contact, escalation to the Grievance Redress Committee (GRC) at the project level, and further referral to state or national authorities when necessary. Grievances can be submitted verbally, in writing, via dedicated phone lines, or through suggestion boxes placed at accessible community locations. The process includes acknowledgment of receipt within a specified time, investigation, feedback, and resolution tracking. Special provisions are made for vulnerable groups to lodge complaints without fear of retribution, and grievance data is used to improve project practices and prevent recurrence of issues.

Monitoring and evaluation (M&E) are integral to ensuring that stakeholder engagement remains effective and aligned with project objectives. The PIU Safeguards Unit, in collaboration with contractors, local government, and development partners, is responsible for regular monitoring of engagement activities, grievance resolution, and stakeholder satisfaction. Key performance indicators (KPIs) include the number of engagement events held, attendance rates by stakeholder category, response time for grievances, and the level of satisfaction with resolutions. Quarterly monitoring reports and annual stakeholder engagement reviews will be prepared, shared with regulators, financiers, and the public. The M&E system also incorporates independent audits and participatory monitoring with community representatives to ensure objectivity and trust.

Recognizing that effective engagement depends on informed and empowered participants, the SEP includes capacity-building programs for both project teams and community stakeholders. For project staff and contractors, training covers stakeholder engagement principles, cultural sensitivity, conflict resolution, and environmental and social safeguards. For community members, especially women, youth, and vulnerable groups, capacity building includes education on their rights, participation in the GRM, entrepreneurial skills, and modern agricultural practices aligned with the AIH and ATC value chains. These programs aim to enable stakeholders to participate meaningfully in decision-making and maximize the socio-economic benefits of the project.

The SEP provides a dedicated budget to support all stakeholder engagement activities, ensuring that planned consultations, disclosure, capacity building, grievance management, and monitoring are adequately resourced. The budget covers human resources (Community Liaison Officers, facilitators), communication materials (brochures, flyers, radio programs), logistics for meetings, grievance handling infrastructure, training programs, and monitoring activities. By securing financial provisions within the overall project cost, the CR-SAPZ PIU ensures that engagement commitments are met consistently over the entire project lifecycle, from pre-construction to decommissioning.

In conclusion, the SEP is both a strategic tool and a social contract, guiding how CR-SAPZ will build trust, manage risks, and maximize shared benefits. Its success depends on continuous, culturally sensitive engagement; transparent information disclosure; responsive grievance handling; and adaptive management. The planned AIH and ATC promise to catalyze agricultural



transformation in Cross River State, creating economic, social, and environmental value for years to come, provided that commitments to inclusive and participatory governance are upheld.

1 INTRODUCTION

This Stakeholder Engagement Plan (SEP) provides an overview of how Cross River State Special Agro-Industrial Processing Zone (CR-SAPZ) is going to manage its communications with its stakeholders. It serves as a living document detailing stakeholder mapping, and past and future engagement. The SEP includes steps to guide future engagement and will need to be periodically revised to ensure effective ongoing stakeholder engagement.

The Federal Government of Nigeria, through the Ministry of Agriculture and Food Security, with support from the African Development Bank (AfDB), Islamic Development Bank (IsDB), International Fund for Agricultural Development (IFAD), has initiated the Special Agro-Industrial Processing Zone (SAPZ) program to accelerate agro-industrialization. The Cross-River State Special Agro-Industrial Processing Zone (CR-SAPZ) is one of the pioneer projects under this initiative. The proposed Agricultural Transformation Centre (ATC) located in Okuku, Yala Local Government Area and Agro-industrial Hub (AIH) located in Adiabo, Odukpani Local Government Area of Cross River state is part of the Special Agro-industrial Processing Zones (SAPZs).

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 Centres (ATCs) and Agro-Industrial Hubs (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 Agro-Industrial Hubs (AIHs) across the participating states and the FCT. Each AIH, 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.

1.1 Proposed Project Locations

Agro-Industrial Hub (AIH)

The 130ha land proposed for the AIH is a communal land of the Adiabo Clan donated to the Government of Cross River State. The proposed AIH in Adiabo, Odukpani Local Government Area of Cross River State is located along Tinapa-Adiabo road at latitude 5° 4'2.88"N; longitude 8°19'17.76"E, covering an approximately 130 hectares of land (Figure). The project site bordered southward at latitude 5° 3'52.81"N; longitude 8°19'25.05"E, a distance of 200m from government secondary school Adiabo while northward, the project area border at latitude 5° 4'4.07"N; longitude 8°19'33.06"E adjacent Banga Camp. At extreme north-western end, the project site bordered at latitude 5° 4'38.92"N; longitude 8°19'5.11"E close to stationaries materials while at the extreme south-western end, the proposed site bordered at latitude 5° 4'6.10"N; longitude 8°18'41.25"E (Figure 2). A tributary of the Cross River traverses the project site before joining the Cross River at latitude 5° 3'29.64"N; longitude 8°18'20.14"E. Major landmarks near the project site include: Government Secondary School Adiabo located 200m southward, Adiabo townhall located 600m south of the project site, Tinapa water park at 1,700m southward, Banga Camp located 250m northward, Marygold International boarding school located 880m northward, Adiabo power sub-station located 1500m northward. The distance from Tinapa junction to the project site is approximately 3,000 metres.

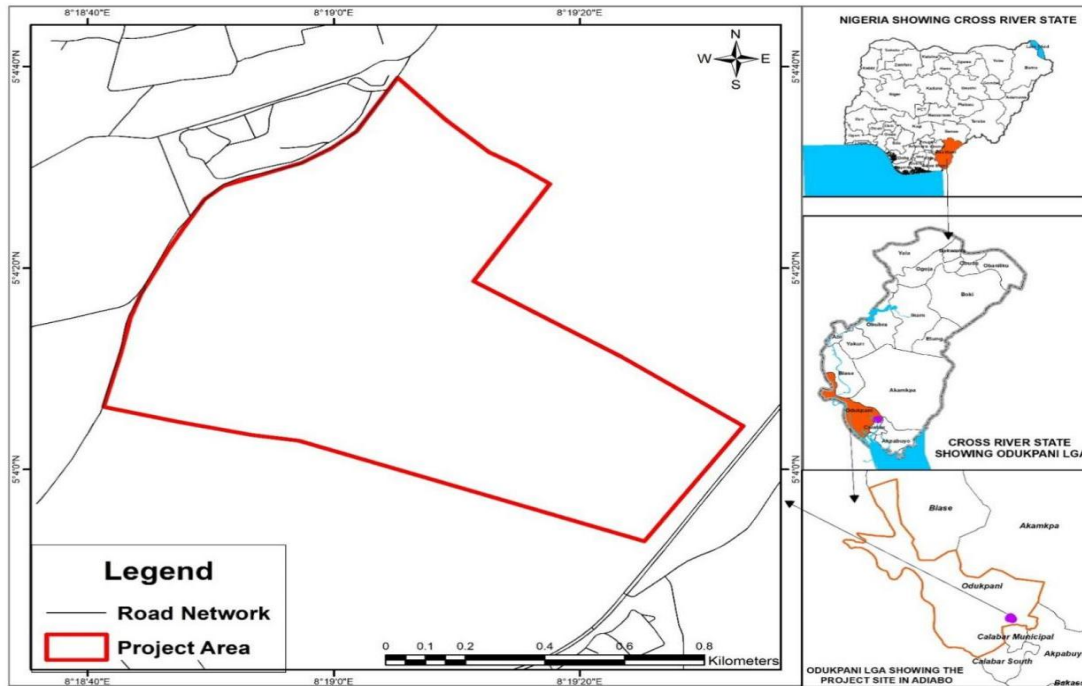


Figure : Location Map of the Proposed Agro-Industrial Hub in Adiabo, Odukpani LGA



Figure 1: Satellite Imagery of the proposed AIH at Adiabo Showing Major Landmarks

Agricultural Transformation Centre (ATC)

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. The proposed ATC 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 (Figure 3) 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°40'59.65"N; longitude 8°47'9.08"E (eastward) and latitude 6°40'58.67"N; longitude 8°46'58.16"E (westward) before joining at a confluence outside the project site at latitude 6°40'48.45"N; longitude 8°47'10.07"E which is 250m west of Ogoja Rice Mill (Figure 3).

1.2 Purpose of the SEP

This SEP sets out a systematic plan for engaging stakeholders throughout the life of the project. It aims to:

- Ensure compliance with Nigerian and AfDB requirements for stakeholder engagement.
- Promote free, prior, and informed consultation (FPIC).
- Build sustainable partnerships with communities and local institutions.
- Document engagement processes, feedback, and actions taken.

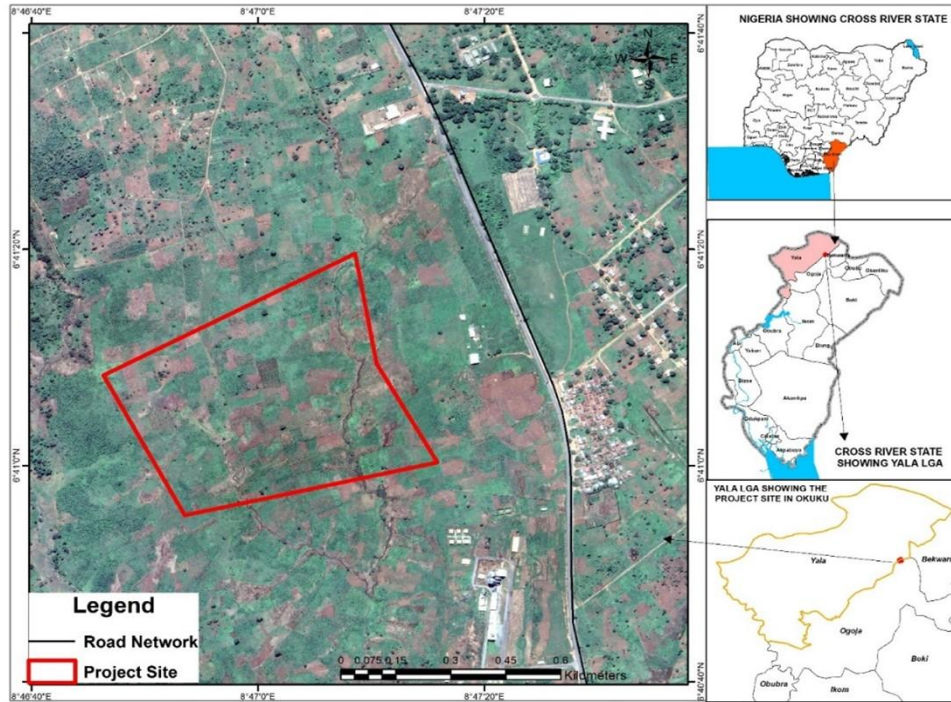


Figure 2: Location Map of the Cross River State Special Agro-Industrial Processing Zone (SAPZ) in Okuku, Yala LGA.

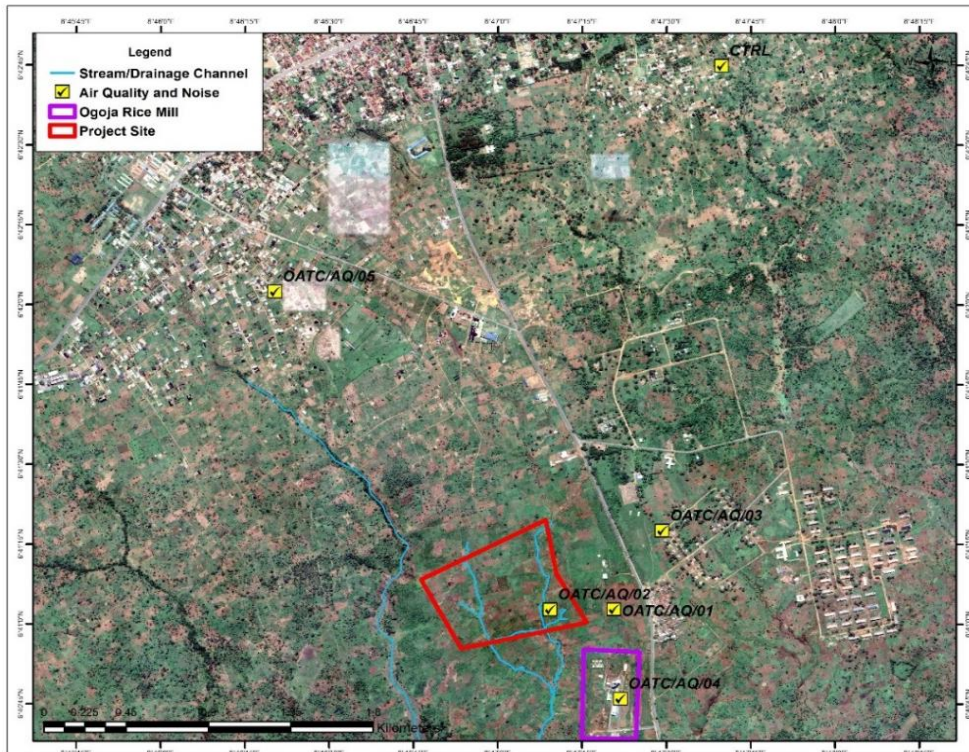


Figure 3: Satellite Imagery Showing Landmarks Around the Project Site in Okuku, Yala LGA.

1.3 Scope of the SEP

The SEP applies to all phases of the AIH and ATC project:

- **Pre-construction:** Land acquisition, resettlement, RAP disclosure, information dissemination.
- **Construction:** Continuous engagement on environmental and social impacts, labor influx, traffic, noise, and safety issues.
- **Operation:** Long-term monitoring, CSR initiatives, livelihood programs.
- **Decommissioning:** Exit strategies, closure planning, restoration of affected areas.

The SEP covers direct project-affected communities — Adiabo Ikot Mbo Otu and Adiabo Esine Ufot (Adiabo LGA) and Ipuole Okuku in (Yala LGA), as well as indirect stakeholders including government institutions, NGOs, and investors.

2 PROJECT DESCRIPTION

2.1 Project Overview

2.1.1 Overview of the Agro-Industrial Hub (AIH)

The Cross-River State Agro-Industrial Hub (AIH) at Adiabo, Odukpani LGA, is a flagship infrastructure project under the CR-SAPZ Program. It is designed to provide a cluster-based environment for agro-processing industries by offering modern infrastructure and common-user facilities. Covering approximately 130 hectares, the site will accommodate processing zones, storage facilities, training centres, residential quarters, and support services. The AIH seeks to integrate agricultural production, value addition, and market access in one location, thereby reducing post-harvest losses, boosting export readiness, and generating employment opportunities. The project is aligned with Nigeria's Agricultural Transformation Agenda and AfDB's Feed Africa strategy.

2.1.2 Overview of the Agricultural Transformation Centre (ATC)

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. 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.

2.2 Project Objectives

The objectives of the AIH/ATC include:

- Enhancing agricultural productivity: Providing farmers with reliable processing facilities to add value to cassava, rice, cocoa, and other crops.
- Promoting industrialization: Hosting agro-based industries with access to electricity, water, and transport infrastructure.
- Job creation: Direct and indirect employment for skilled and unskilled labor, with emphasis on youth and women.

- Reducing rural poverty: Creating market linkages, out-grower schemes, and livelihood enhancement programs.
- Environmental sustainability: Implementing eco-friendly waste management, climate-smart infrastructure, and biodiversity protection.

2.3 Project Components

The proposed AIH/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 AIH/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. The industries will be built, owned and operated by prospective investors. Based on the value chain needs of the AIH/ATC, the site layout is developed and shown in (Figure 4 and Figure 5)

On-Site Infrastructure and Facilities Planning

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

Table 1: AIH/ATC Site provisions

SN	Description	Remarks
1	Land Development	<p>AIH: 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 12.5 ha of the proposed site (Figure 4) shall be conserved green to retain the carbon sequestration capacity of the site. The total area that would be cleared of vegetation is 37.94 ha. The remaining 80 ha of the available 117.5 ha has crops that would be harvested before construction. The trees in this portion of the land will be left, as much as possible, standing.</p> <p>ATC: 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 4) 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 and they will be conserved during the project activities and beyond. (Figure 7).</p>

SN	Description	Remarks
2	Boundary wall and fencing	<p>AIH: 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 4.6 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 164,720.23.55 m³ of biomass that will be removed during site clearing. Approximately, 170,000 pieces of concrete blocks will be used to erect the perimeter fence.</p> <p>ATC: 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 m³ of biomass that will be removed during site clearing. Approximately, 57,200 pieces of concrete blocks will be used to erect the perimeter fence.</p>

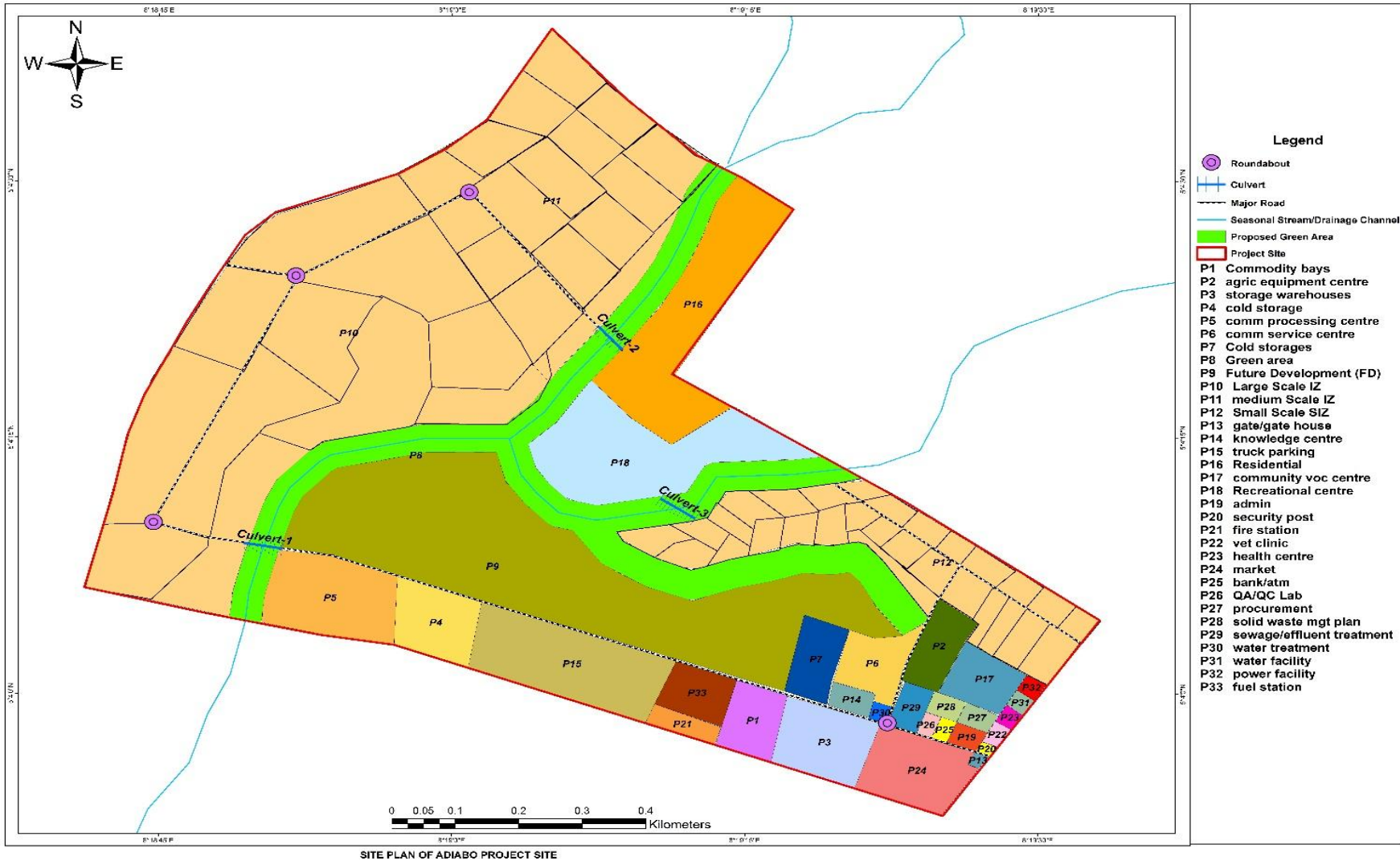


Figure 4: Proposed AIH Layout

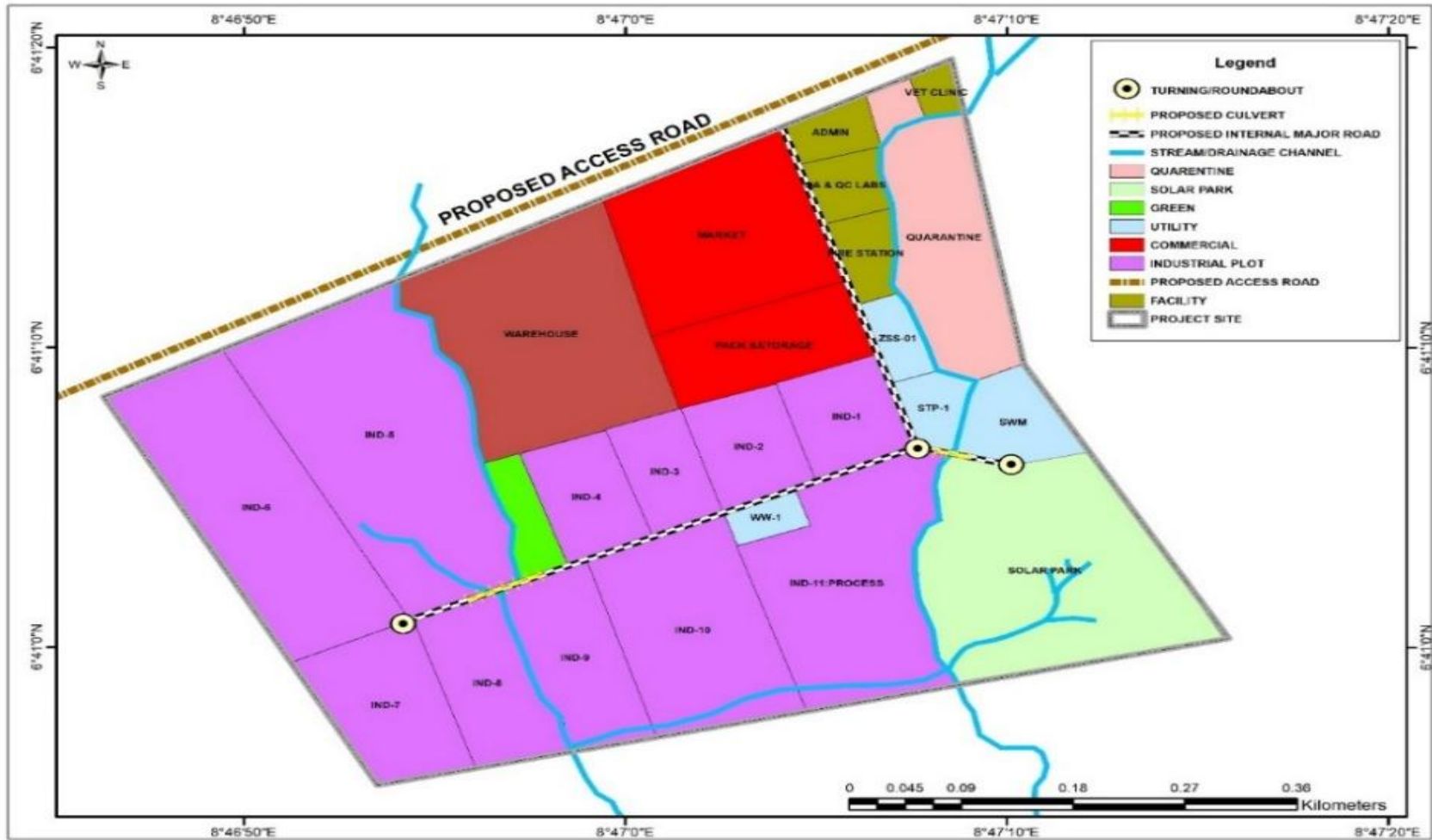


Figure 5: Proposed ATC Layout

Table 2: Facilities and components in the proposed AIH/ATC

Description	Area (SqM)	
	AIH	ATC
Perimeter Fence	1,150	650
Gate /gate house	500	250
Security outpost	500	250
Commodity service Centre	10,000	3,000
Commodity processing Centre	20,000	5,692
Industrial / Employment zone	100,000	28,462
Truck Park	30,000	20,000
Community vocational Centre	10,000	5,000
Residential area	50,000	15,000
Water facility (boreholes, overhead tanks/steel towers & reticulation)	1,000	1,000
Water treatment plant	1,000	1,000
Power facility	1,000	1,000
Storage warehouses	20,000	5,000
Cold storages (meat etc.)	10,000	3,000
Fuel station	5,000	1,500
Solid waste management plant	2,000	1,000
Sewage and effluent treatment plant	4,000	1,000
Fire station	1,000	1,000
Admin. Block	2,000	1,000
Commodity loading and uploading bays	10,000	5,000
Veterinary clinics	1,000	350
Health centre	1,000	350
Market	20,000	10,000
Recreational	10,000	2,000
QA&QC lab	1,000	350
Knowledge centre	3,000	800
Procurement centre	2,000	500
Agric equipment centre	10,000	3,000
Bank + ATM services	2,000	600
Small scale industrial zone	200,000	55,000
Medium scale industrial zone	200,000	55,000
Large scale industrial zone	200,000	55,000
Future development area	175,000	30,000
Green area	125,000	65,246
	1,328,000	378,000

Table 3: AIH/ATC component capacity and lifespan details

Component	ATC Project Components		AIH Project Components	
	Capacity / Specification	Design Life (Years)	Capacity / Specification	Design Life (Years)
Internal Roads	2902 Rmt, Flexible pavement, 18m ROW with solar street lights	20	5500 Rmt, Flexible pavement, 18m ROW with solar street lights	20
Drains	5804 Rmt, RCC rectangular, 600 mm wide	30	12804 Rmt, RCC rectangular, 600 mm wide	30
Power Demand	Peak Load 13 MVA (Installed capacity 500 KVA)	N/A	Peak Load 23 MVA (Installed capacity 500 KVA x 2)	N/A
Substation	1 Compact substation (500 KVA)	20	Compact substation (1000 KVA)	20
Electrical Distribution	3.8 km	20	13.8 km	20
Borewells	2 Nos, Depth 200 m, Yield 65 m ³ /hr	20	2 Nos, Depth 200 m, Yield 65 m ³ /hr	20
Storage Tanks	500 KLD, Ground-level RCC tanks	35	500 KLD, Ground-level RCC tanks	35
HDPE Distribution Pipes	3.8 km, PN 10, 225–280 mm diameter	25–50	13.8 km, PN 10, 225–280 mm diameter	25–50
Wastewater Generation	750 KLD, Domestic + Industrial mix	N/A	1750 KLD, Domestic + Industrial mix	N/A
STP Type	MBBR technology		MBBR technology	
STP Capacity	500 KLD		500 KLD	
STP Lifespan (Civil)		35		35
STP Lifespan (Mechanical)		15		15
Sewer Network	3.8 km, HDPE 225–280 mm diameter	25–50	9.8 km, HDPE 225–280 mm diameter	25–50
Admin / R&D / Other Buildings	RCC framed, GI roofing	50–60	RCC framed, GI roofing	50–60
Public Toilets	60 sqm, 16 WCs	30–40	60 sqm, 16 WCs	30–40
Fire Station	75 sqm, RCC, 24x7 manned	40–50	75 sqm, RCC, 24x7 manned	40–50
Gate & Gatehouse	RCC structure	40–50	RCC structure	40–50
Chain Link Fencing	2600 Rmt, 2m height, steel posts with concrete foundation	15–20	4600 Rmt, 2m height, steel posts with concrete foundation	15–20

Table 4: Facility Design Details

	Design Details of AIH	Design Details of ATC
Area in Ha	130 ha	37.8 ha (green area – 6.5 ha)
Time period (AIH+ATC)		
Design	4 Months	4 Months
Construction	18 Months	18 Months
O&M (Including DLP)	60 Months	60 Months
Internal Road	Length: 5500 Rmt ROW: 18m wide, with solar street lights and channel kerbs.	Length: 1902 Rmt ROW: 18m wide, with solar street lights and channel kerbs.
Drain	Length: 3804 Rmt - ranging from 500mm x 500mm to 1000mm x 1000mm	Length: 3804 Rmt - ranging from 500mm x 500mm to 1000mm x 1000mm
Electrical		
Power Source	0.2 km to the substation, 33 kV line along the plot boundary	0.2 Km to the substation, 33 kV line along the plot Boundary
Power Demand	13MVA	13MVA
Distribution length	3.8 km	3.8 km
Sub-station	Compact substation of 1000 kVA	Compact substation of 500 kVA
Water		
Source	Ground Water (Unless state brings surface water to the site)	Ground Water (Unless state brings surface water to the site)
Demand	1500 KLD	1500 KLD
borewell	2 Nos	2 Nos
Storage	1000 KLD Capacity	500 KLD Capacity
Distribution	3.8 Km of HDPE pipe ranging from 225 mm to 280 mm	3.8 Km of HDPE pipe ranging from 225 mm to 280 mm
Wastewater		
Generation	1550 KLD	750 KLD
STP	1000 KLD	500 KLD
Conveyance	3.8 Km of HDPE pipe ranging from 225 mm to 280 mm	3.8 Km of HDPE pipe ranging from 225 mm to 280 mm
Buildings	1. Administrative Block + Research and Development + Disaster Management - 400 Sqm	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)	75 Sqm - with Shed for fire tender (Does not include cost of fire tender)
Public Toilet	60 Sqm - 8 WCs x 2	60 Sqm - 8 WCs x 2
Gate & Gatehouse	1 Nos	1 Nos
Boundary wall	4600 Rmt - Chain Link Fencing	2600 Rmt - Chain Link Fencing
Access Roads	Since the Plot is next to the Highway, Access Road has not been considered	1.2 km

2.4 Physical Aspects of the Project with Potential Impacts on Stakeholders

The proposed Agro-Industrial Hub at Adiabo and Agricultural Transformation Centre at Okuku involve large-scale land development and infrastructure works—roads, drainage, utilities, perimeter fencing, processing and storage facilities, and vocational centres. These physical components will alter land use and local environments while creating both risks (loss of farmland, construction disturbance) and opportunities (jobs, market access, skills development) for surrounding stakeholders. Details of the physical aspects of the project that will have physical and economic impacts on stakeholders are summarised in Table 5.

Table 5: Physical Aspects of the Project with Potential Impacts on Stakeholders

Project Aspect	Details from Draft SEP	Potential Physical Impact on Stakeholders	Potential Economic Impact on Stakeholders
Land Take for AIH	130 ha of communal land donated by the Adiabo Clan	Physical loss of communal farmland; change in land use; vegetation clearance of about 37.94 ha with conservation of 12.5 ha green areas	Temporary or permanent loss of agricultural income for users of the land; need for compensation/livelihood restoration
Land Take for ATC	37.8 ha of state-owned land in Okuku, currently cultivated by farmers	Physical displacement of existing crops; conservation of 6.5 ha green area; 62 trees retained	Loss of seasonal harvests; interruption of smallholder livelihoods; need for RAP/alternative livelihoods
Site Clearing & Vegetation Removal	Clearing of vegetation except conserved areas (Table 1; Fig. 7–8)	Changes to local ecosystem, loss of shade trees, altered drainage patterns	Loss of non-timber products, firewood, grazing, or other ecosystem services that support local incomes
Perimeter Fencing & Boundary Walls	AIH: 4.6 km wall fence with tree planting; ~170,000 concrete blocks. ATC: 2.6 km fence; ~57,200 blocks (Table 1)	Restricted access to previously open areas; increased security presence	Reduced informal access to land/resources but potential security for neighbouring communities; local supply of labour and materials for fence construction
Construction of Common Infrastructure (roads, drains, power, water, waste plants)	Internal roads, drains, power supply, water supply, STP, warehouses, etc.	Temporary construction disturbance: noise, dust, traffic increase; possible alteration of local drainage	Creation of construction jobs; local procurement opportunities for materials; improved access roads for community post-construction
Industrial / Employment Zones	Large industrial zones planned at AIH (100,000 m ² +); ATC smaller zones	Industrial activity near communities; increased traffic and waste generation	New agro-processing jobs, training opportunities, out-grower schemes, market linkages
Truck Parks, Loading Bays, Market Facilities	Dedicated truck parks, commodity loading bays, market space	Increased heavy vehicle movement, potential congestion	Improved market access and reduced post-harvest losses for farmers; income from logistics/ancillary services
Water Extraction & Effluent Treatment	Boreholes 200 m depth, 65 m ³ /hr yield; STPs 500–1000 KLD	Possible change in groundwater level/quality if not managed; discharge of treated effluent	Potential service charges for water/effluent; local jobs in plant operation; improved sanitation reducing health costs

Solid Waste & Sewage Plants	Planned at both sites	Need for proper management to avoid odour, vector, contamination	Opportunities for waste recycling enterprises and employment
Community Vocational Centres & Training Facilities	Included in both sites (Table 2)	New infrastructure in/near communities	Capacity building for youth/women, improving employability and incomes
CSR & Livelihood Restoration Programs	SEP commits to local hiring, CSR, training, inclusion of vulnerable groups (Executive Summary; Social Desirability section)	Mitigates adverse impacts; social investment infrastructure	Direct economic benefits through jobs, training, and social programmes

2.5 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.

2.5.1 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 program 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 program are enormous to agricultural development in Nigeria. However, the specific benefits have been categorized into three namely:

2.5.2 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.

2.5.3 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.

2.5.4 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 other international certifications for processing activities.

2.5.5 Revenue Drivers

The expected revenue drivers of the proposed AIH/ATC are presented in Table 5.

Table 5: Revenue Sources

Revenue sources	Details
Revenue from developed plots of the AIH/ATC – industrial, residential, commercial and social sections	<ul style="list-style-type: none"> ➤ The AIH/ATC shall actively market the multi-formatted developed plots for mixed-use like industrial, commercial, residential and social areas. ➤ The management of the AIH/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 AIH/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 AIH/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 from facility management	<ul style="list-style-type: none"> ➤ There will be M & E on AIH/ATC utilities and infrastructure facilities to ensure delivery of design standards in service are given paramount importance. The AIH/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 AIH/ATC covering warehoused, procurement centres, packing & labeling, 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 AIH/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

Revenue sources	Details
Margins from commercial and common social infrastructure	➤ Income from shared services and infrastructure
Income from business support	➤ Income earned from various business support services
Income from business facilitation	➤ Income from various business facilitation, link-ups, produce marketing support, branding, etc.
Margin from auxiliary services	➤ Income from food courts, restaurants, banks, vending machines, etc.
Revenue from advertisement	➤ Revenue from advertisements, billboards, trade shows, etc.
Truck parking	➤ Revenue from vehicle and truck parking lots, loading bays, etc.
Weighbridge	➤ Fees charged on weighing of trucks and lorries based on weight

2.6 Value of the Project

Table 6 and

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

Table 6: Potential Cassava Value Chain

Potential value	Details
Potentials for value addition	<ul style="list-style-type: none"> ✓ Increase yields from 9 ton to 30 mt / ha ✓ Availability of improved varieties ✓ Production/processing of industrial products such as ethanol, starch, etc. ✓ Import substitution potentials ✓ Availability of improved processing techniques
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 7: 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 for pro-poor growth Gender relevance	<ul style="list-style-type: none"> ✓ Women are actively involved in processing and production ✓ 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	<ul style="list-style-type: none"> ✓ 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	<ul style="list-style-type: none"> ✓ Favourable climatic condition such as low temperature and optimum relative humidity during large part of the year
Profitability	<ul style="list-style-type: none"> ✓ Highly profitable upon meeting the requirement of the buyers and off-takers

2.7 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.

2.7.1 Social Desirability

The AIH/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:

- i 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.
- ii Implementation of Corporate Social Responsibility (CSR) programmes targeted at improving Socioeconomic and health status in project affected communities will be embarked upon.
- iii 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.
- iv Promote training, mentorship and development opportunities to prepare talented employees for successful succession

2.7.2 Economic Viability

The economic viability of the proposed AIH 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 AIH 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.

2.8 Development Options

2.8.1 No Project Option

This is a do-nothing option. This option implies that the AIH/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.

2.8.2 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.

2.8.3 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.

2.8.4 Project Sites Alternatives

Land 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. Eight different locations were assessed and they include: Mbarakom in Akamkpa LGA, Ekpri Ikang in Bakassi LGA, Ikot Mbakara in Akpabuyo LGA, 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.

- **For AIH:** From the result in this analysis, among all the sites selected, the proposed site at Adiabo was observed to be highly suitable for the project as it meets all the criteria. For instance, location like Ekpri Ikang in Bakassi and Ikot Mbakara in Akpabuyo were observed to be highly susceptible to flooding due to its low topography while Mbarakom, apart from low level of accessibility due to bad roads and far distance from market, it is also threatened by gully and difficult terrain. Adiabo 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. Hence, Adiabo was accepted as the suitable site for the project (Figure 9 and Table 8).
- **For ATC:** 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 9 and Table 8).

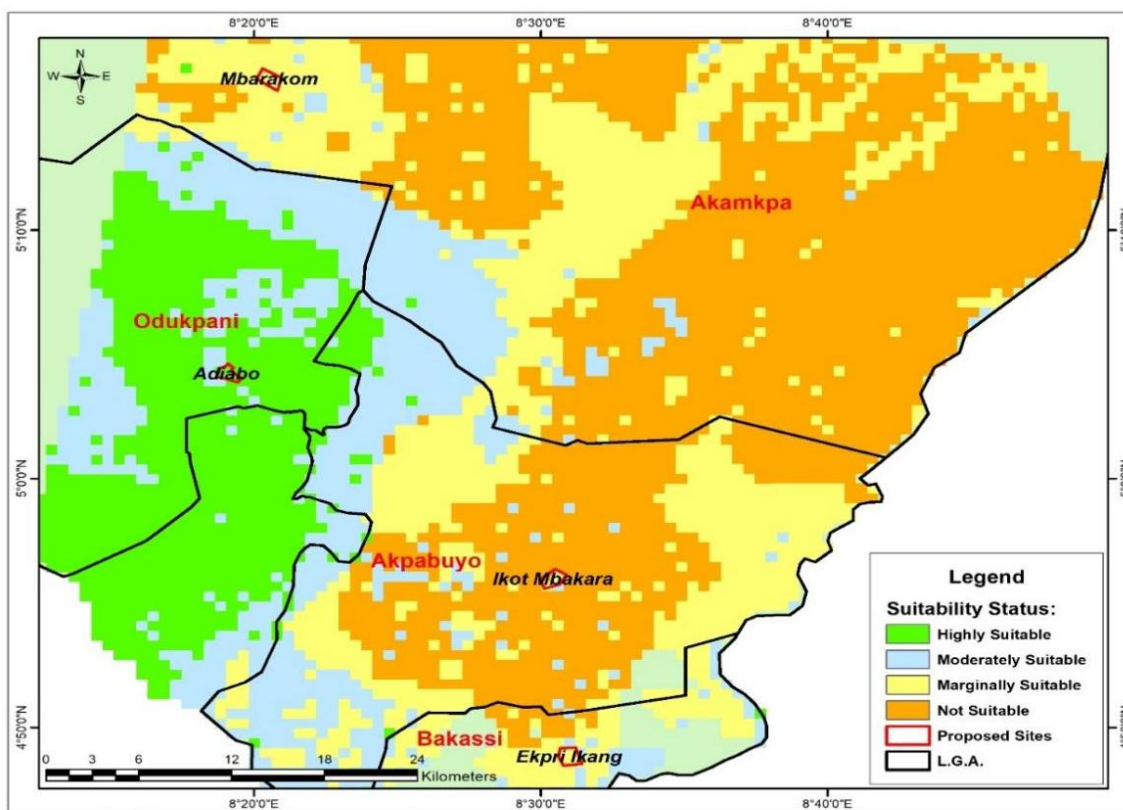


Figure 8: Suitable Site Selection for the Project Using GIS and MCE Techniques

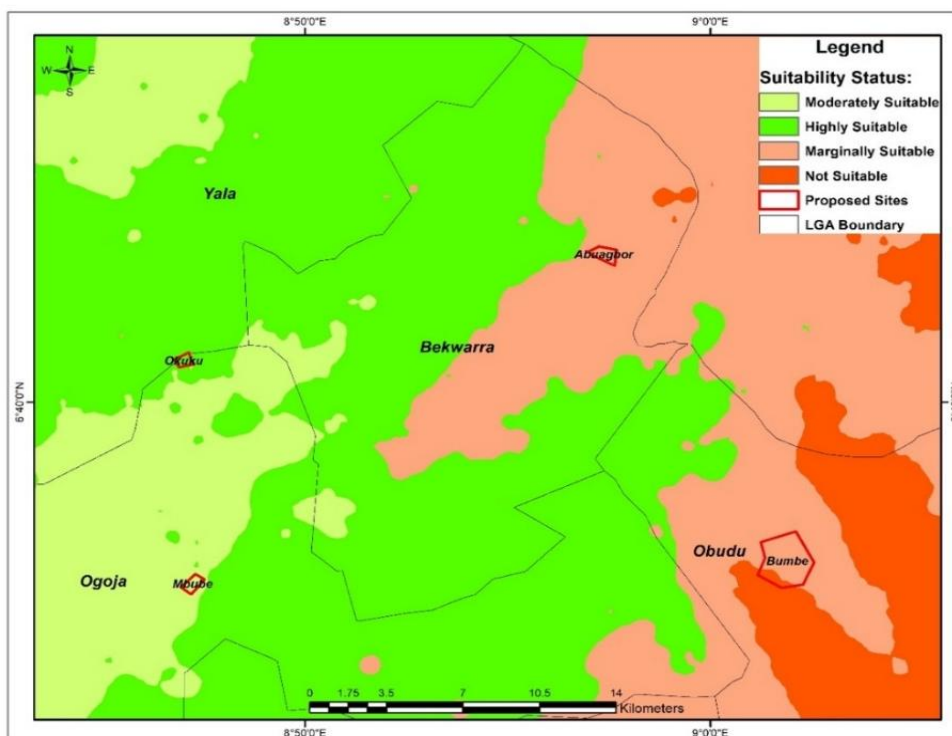


Figure 9: Site Suitability Map for the proposed ATC Using GIS and MCA Techniques

Table 8: MCA for site selection

	Location	Land Availability	Relief	Inter-modal Accessibility	Security	Proximity to farmers	Proximity to markets	Score (%)	D
MCA for Site Selection for AIH									
1	Ekpri Ikang, Bakassi	5	8	4	3	4	4	38.33	R
2	Ikot Mbakara, Akpabuyo	4	8	6	4	4	5	51.67	R
3	Adiabo, Odukpani	5	7	9	9	6	8	78.33	S
4	Mbarakom, Akamkpa	7	6	3	6	6	5	45.00	R
MCA for Site Selection for AIH									
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.

2.9 Project Area of Influence (AoI)

The direct AoI includes Adiabo Ikot Mbo Out, Adiabo Esine Ufot and Ipuole Okuku. These communities are expected to experience direct impacts such as land acquisition, employment opportunities, traffic, noise, and livelihood changes.

The indirect AoI covers other settlements in Odukpani LGA, Yala LGA, Calabar Capital Territory, and adjoining areas along Tinapa–Adiabo Road. These communities may experience secondary impacts such as improved infrastructure, regional economic spillovers, and environmental changes (air quality, water use). The AoI also includes associated facilities, such as Ogoja rice mill, Tinapa Road rehabilitation and potential linkages to Calabar Port and power sub-stations, which support the facilities operations.

2.10 General Construction Work scope

Figure 10 presents flow chart of the work scope and the principal sequence of construction works process for the infrastructure while the proposed project execution Schedule is presented in Appendix 1.

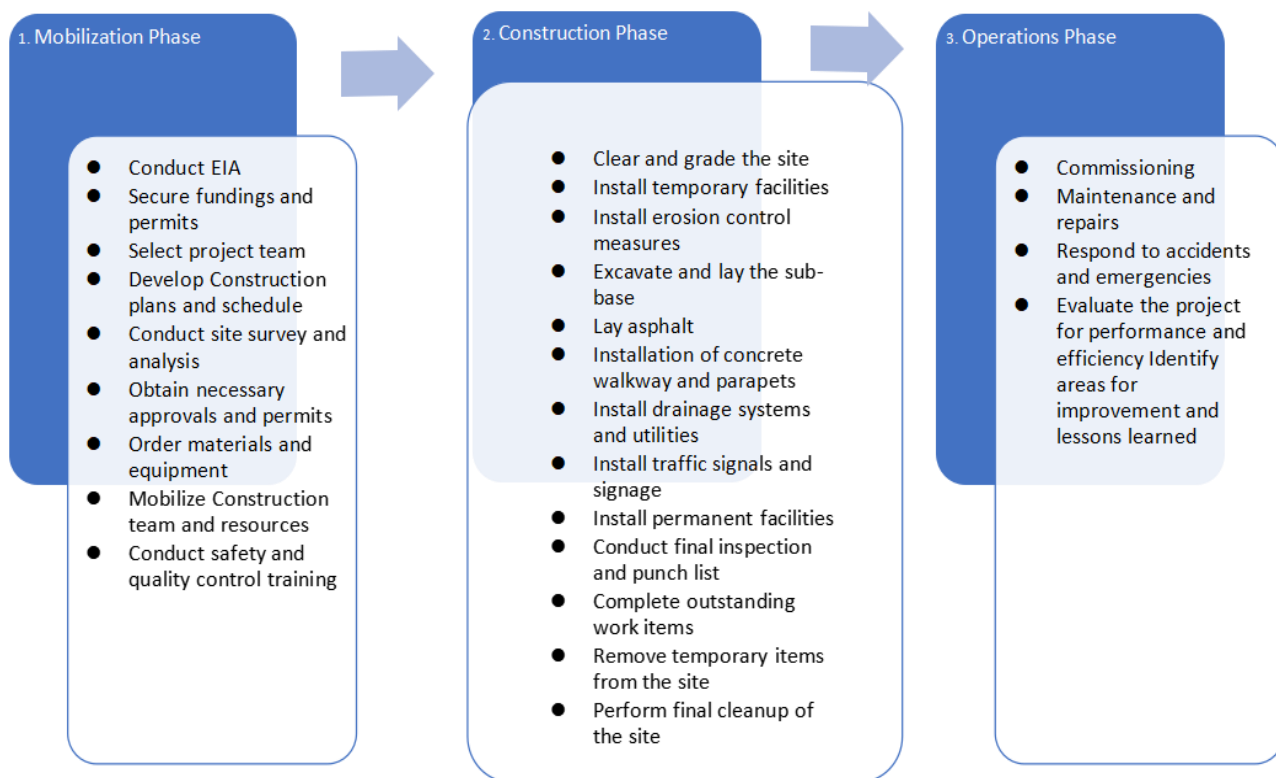


Figure 10: Flowchart of general construction work

3 POLICY, LEGAL, AND INSTITUTIONAL FRAMEWORK

3.1 National Legal and Policy Framework

The Stakeholder Engagement Plan (SEP) for the proposed AIH/ATC is anchored in Nigeria's environmental, social, and development laws. These laws not only govern project approvals but also ensure that implementation respects the rights of affected communities, protects the environment, and aligns with national development priorities.

This process is not only a best practice but a legal requirement under:

- EIA Act (Cap E12, LFN 2004) – Mandates public consultation for environmentally significant projects.
- AfDB Integrated Safeguards System (ISS) – Requires identification of all relevant stakeholders, including vulnerable groups, and the establishment of culturally appropriate engagement processes and also, the inclusion of disadvantaged groups in project decision-making.
- Land Use Act, 1978 – Governs compensation and resettlement for land acquisition.

3.2 Institutional Arrangements

Stakeholder engagement will be implemented through a coordinated multi-level structure:

- Federal Ministry of Environment (FMEnv) – Approves ESIA, monitors compliance, and ensures national environmental laws are upheld.
- Cross River State Government (CRSG) – Provides enabling policies, supervises compliance at the state level, and coordinates with LGAs.
- CR-SAPZ Project Implementation Unit (PIU) – Central body for SEP execution, grievance handling, and monitoring.
- Development Partners (AfDB) – Provide financing, technical oversight, and safeguard compliance monitoring.
- Host Communities – Active partners in consultations, grievance redress, and benefit-sharing programs.

4 STAKEHOLDER IDENTIFICATION AND MAPPING

Effective stakeholder engagement begins with the accurate identification and mapping of all parties who may be affected by or have an interest in the CR-SAPZ project (AIH and ATC). Stakeholder mapping is a critical step in developing a transparent and inclusive engagement process. It ensures that project benefits are equitably distributed, risks are mitigated, and that vulnerable groups are not excluded from participation. The identification process builds on the scoping consultations and socio-economic surveys conducted during the ESIA. Stakeholders were categorized based on their roles, influence, level of interest, and vulnerability.

Stakeholder mapping ensures that:

- Benefits such as employment, training, and market access reach the intended beneficiaries (e.g., local farmers, youth, women).
- Risks such as livelihood disruption, land loss, and environmental impacts are addressed through proactive mitigation.
- Regulatory compliance and donor requirements are met.

4.1 Methodology for Stakeholder Identification

The identification process for the AIH and ATC was conducted through:

1. Desk Review – Analysis of:
 - Socio-economic data collected during the ESIA.
 - Land tenure information from the Adiabo Clan and Cross River State Government records.
 - Existing institutional frameworks from Section 3.
2. Field Consultations –
 - Town hall meetings in Adiabo Ikot Mbo Otu, Adiabo Esine Ufot, and Ipuole Okuku.
 - Preliminary discussions with traditional rulers, women’s cooperatives, youth associations, and farmer groups.
3. Participatory Mapping –
 - Identification of land use patterns, crop value chains (cassava, rice, cocoa), and proximity to key infrastructure (roads, markets).
 - Focus group discussions (FGDs) with vulnerable groups, including widows, persons with disabilities (PWDs), and unemployed youth.
4. Influence–Interest Analysis –

- Categorization of stakeholders into primary, secondary, and tertiary groups based on their role in — and influence over — project outcomes.

This process ensured inclusivity, capturing voices of government institutions, host communities, private investors, NGOs, women and youth groups, and vulnerable population

4.2 Categories of Stakeholders

4.2.1 Primary Stakeholders (Directly Affected)

Primary stakeholders are those directly affected by the project, either positively or negatively. These include:

1. Host Communities:
 - Adiabo Ikot Mbo Otu and Adiabo Esine Ufot (Odukpani LGA) – Land donation, direct employment, and environmental changes.
 - Ipuole Okuku (Yala LGA) – Loss of cultivated farmland, opportunities for processing-related jobs.
2. Project-Affected Persons (PAPs):
 - Landowners, tenant farmers, and sharecroppers losing agricultural land due to project footprint.
 - Protected under Land Use Act, 1978 with compensation to be addressed via the RAP.
3. Women's Cooperatives:
 - Active in cassava processing and rice milling; likely to benefit from market access and training but at risk of exclusion without gender-sensitive measures.
4. Youth Associations:
 - Expect opportunities for skills acquisition, construction jobs, and entrepreneurship.
5. Vulnerable Groups:
 - Elderly farmers, widows, PWDs, farmers' cooperatives (Adiabo & Okuku) and landless laborers needing targeted livelihood support.

4.2.2 Secondary Stakeholders

Secondary stakeholders include institutions and groups that play a regulatory, facilitative, or oversight role, such as:

1. Government Agencies –

- Federal Ministry of Environment (FMEnv) – ESIA approval, monitoring compliance under EIA Act.
 - Cross River State Ministry of Environment (CRMEnv) – State-level oversight.
 - State Environmental Protection Agency (SEPA) – Waste management, pollution control.
 - Ministry of Agriculture and Natural Resources – Agricultural value chain integration.
 - Local Government Councils (Odukpani & Yala) – Local mobilization and land matters.
2. Development Partners –
- AfDB – Provide financing, safeguard monitoring, and technical assistance.
3. Private Sector Actors –
- Agro-processors, logistics providers, input suppliers, and contractors.

4.2.3 Tertiary Stakeholders

These are groups with indirect or less obvious linkages but who may still influence project outcomes:

1. Civil Society and NGOs: Working in areas of human rights, environment, women empowerment, and rural development.
2. Academic and Research Institutions: University of Calabar, Cross River University of Technology, which can provide technical expertise and impact monitoring.
3. Media Organizations: Local and regional media who shape public perception of the project.

4.2.4 Vulnerable Groups

Special attention is given to:

- Women-headed households.
- The elderly and widows.
- Persons with disabilities (PWDs).
- Youth, especially unemployed graduates and artisans.
- Landless laborers and informal workers.

These groups will benefit from targeted livelihood restoration, capacity building, and preferential access to jobs as part of RAP and CSR commitments.

4.3 Stakeholder Analysis: Interests and Concerns

Stakeholders hold diverse expectations and concerns regarding the AIH/ATC. For instance:

- Host communities are primarily interested in employment opportunities, improved infrastructure, and fair compensation. However, they express concerns about potential land loss, cultural heritage erosion, and environmental risks such as pollution.
- Government agencies emphasize regulatory compliance, environmental sustainability, and contribution to the state’s development agenda. Their concerns focus on whether the project adheres to environmental laws, labor standards, and fiscal transparency.
- Investors and contractors are motivated by economic returns and efficiency. Their concerns are tied to operational risks, community relations, and regulatory approvals.
- NGOs and CSOs advocate for transparency, inclusivity, and protection of vulnerable groups, often monitoring the project to ensure international safeguard compliance.

This analysis demonstrates that while some stakeholders see the AIH and ATC as an economic opportunity, others view it as a potential threat to social and environmental systems. Engagement strategies must therefore address both opportunities and risks.

4.4 Power–Interest Mapping of Stakeholders

To better understand the dynamics of engagement, stakeholders were mapped based on their level of influence (power) and degree of interest in the project (as indicated in Table 10):

- i High Influence, High Interest: State and federal regulators, host communities, and AfDB. These require close, continuous engagement.
- ii High Influence, Low Interest: Media organizations and political actors, who may not be deeply involved but can affect perception.
- iii Low Influence, High Interest: PAPs, women, youth, and vulnerable groups. They must be actively empowered to participate.
- iv Low Influence, Low Interest: Peripheral stakeholders such as distant communities, who need only periodic information sharing.

Table 9: Stakeholder Matrix (Interest–Influence Grid)

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

Stakeholder Group	Interest in Project	Influence on Project	Engagement Priority
Odukpani and Yala LGA	Medium	High	Institutional partner for local support
CRMEnv & SEPA	Medium	High	Regulatory partner, Safeguards monitoring – periodic engagement
Federal Agencies (FMEnv)	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

This matrix demonstrates that while host communities and PAPs hold the highest interest, regulatory agencies and traditional leaders wield high influence. The SEP prioritizes engagement strategies to balance both dynamics

4.5 List of Stakeholders Identified

Aside been able to categorise the stakeholders into various tiers, it is important to accurately identified stakeholders who may be affected by or have an interest in the CR-SAPZ project (AIH and ATC) and those with physical and economic activities around the ATC and AIH sites. Table 11 presents the list of identified stakeholders and their categories.

Table 11: List of Identified Stakeholders and their Categories

Identified Stakeholders	Categories
Adiabo Clan Council Elders, Adiabo Clan Youth, Adiabo Clan Women, Okuku Clan Elders, Okuku Clan Youth, Okuku Clan Women	Primary Stakeholders (Directly Affected)
CR Ministry of Environment, CR Ministry of Agriculture & Irrigation, CR Ministry of Lands, CR Ministry of Information, CR Ministry of Health, CR Ministry of Justice, CR Ministry of Women Affairs & Social Welfare, CR Ministry of Wealth Creation, CR Ministry of Commerce & Industry, CR State Emergency Management Agency, CR State Inland Revenue Service, CR Agricultural Development Program, CR Geographical Information Agency, CR Surveyor-General, CR Waste Management Agency, CR Fire Service Department, Yala LGC, Odukpani LGC, Federal Ministry of Agriculture & Food	Secondary Stakeholders

Security, Federal Road Safety Corps (FRSC), Federal Ministry of Environment, National Inland Waterways Authority (NIWA), Nigeria Immigration Service, Nigeria Customs Service, Nigeria Navy (NN Victory), Nigeria Police, Nigerian Army, Department of State Security (DSS), Nigerian Security and Civil Defense Corps (NSCDC)	
Academia (Prof. Ekom Robert, UNICAL, & Prof. Adah, UNICROSS), Wildlife Conservation Society, Farmers' Cooperatives (Adiabo & Okuku)	Tertiary Stakeholders

4.6 Implications for Engagement Strategy

The outcome of this identification and analysis provides a strong foundation for Section 7 (Engagement Strategy). Key implications include:

- Ensuring early and continuous consultation with host communities and PAPs.
- Establishing structured forums for government–community dialogue.
- Providing targeted support (capacity building, advocacy training) for women, youth, and vulnerable populations to ensure meaningful participation.
- Maintaining transparent disclosure mechanisms to build trust with NGOs, media, and civil society.

5 STAKEHOLDER ENGAGEMENT TO DATE

Stakeholder engagement is not starting anew with this SEP several rounds of consultations have already been conducted during the ESIA preparation phase in May/June 2025. These engagements were designed to:

- Inform stakeholders about the project and its potential impacts.
- Obtain feedback on community concerns, priorities, and expectations.
- Integrate local knowledge into the ESIA process.
- Build trust between the CR-SAPZ PIU and affected communities.

This section provides a summary of the stakeholder engagement activities carried out to date, the methodologies used, and key issues raised.

5.1 Methods of Engagement

Multiple participatory approaches were adopted to reach different categories of stakeholders identified in Section 4:

1. Community Town Hall Meetings:
 - Held in Adiabo Ikot Mbo Otu, Adiabo Esine Ufot, and Ipuole Okuku (Plate 1-4)
 - Provided an open forum for community members to understand the project scope, benefits, and potential impacts.
2. Focus Group Discussions (FGDs):
 - Targeted women's cooperatives (cassava processors, rice millers), youth associations, and fisherfolk to capture group-specific needs.
 - Ensured that vulnerable groups — widows, PWDs, elderly farmers — had a dedicated platform for their voices to be heard.
3. Key Informant Interviews (KIIs): Conducted with village heads, clan chiefs, religious leaders, and school administrators to discuss cultural, social, and livelihood considerations.
4. Stakeholder Workshops –
 - Convened in Calabar with FMEnv, NESREA, CRMEnv, representatives (Plate 5).
 - Focused on regulatory requirements, environmental safeguards, and project alignment with state/national policies.
5. Household Socio-Economic Surveys: Collected baseline data on land use, livelihoods, education, and health, which will be used for monitoring and RAP implementation.

The diversity of approaches ensured that both literate and non-literate stakeholders, as well as marginalized groups, were included in the process.



Plate 1: Consultation Meeting with the Chairman, Yala LGA, Councilors, Ipuole Okuku



Plate 2: 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 3: (Right): Focused Group Meeting with Elders of Adiabo Ikot Mbo Otu and Adiabo Esine Ufot Communities at Adiabo Town Hall On 18.06.2025

Plate 4: (Left): Consultation Meeting with Leaders of Adiabo Ikot Mbo Otu and Adiabo Esine Ufot at Adiabo Town Hall on 18.06.2025



Plate 5: Cross sections of participants at the stakeholders engagement/scoping workshop (top left), NESREA Rep. making his contribution (top-middle); CR-SAPZ Rep. fielding questions from participants (top right); FMEnv. Rep sitting among Adiabo contingent at the work (down 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 (down middle) and reps of the Nigerian Navy, NSCDC, Customs, among other participants (down right)

5.2 Stakeholders Consulted

Engagements involved a broad range of stakeholders, including:

- i Host communities: Chiefs, elders, youth associations, women’s cooperatives, farmers, and artisanal fishers.
- ii Traditional leaders: Village heads and clan chiefs responsible for cultural and land-related issues.
- iii Government representatives: Ministries of Environment, Agriculture, Commerce & Industry, Odukpani LGA, Yala LGA and traditional institutions.
- iv Civil society organizations (CSOs) and NGOs: Groups focused on environment, gender empowerment, and community rights.
- v Development partners: AfDB who participated in technical and safeguard Missions.

5.2.1 Summary of Engagement Activities

Summary of the engagement activities is presented in Table while the minute of the engagement is presented in Appendix II.

Table 12: Summary of Engagement Activities

Date (2025)	Location	Stakeholder Category	Method	Participants	Key Issues Raised
May 15	Adiabo Ikot Mbo Otu	Host community, PAPs	Town Hall	~120	Job opportunities, land loss, need for local hiring quota
May 17	Ipuole Okuku	Farmers, women's group	FGD	25	Access to markets, livelihood restoration, water quality concerns
June 1	Adiabo Esine Ufot	Youth association	FGD	30	Skills acquisition, security of employment, start-up support
June 5	Calabar	Regulators, dev. partners such as LGAs, NGOs, State Ministries	Workshop	40	Compliance with AfDB ISS, EIA Act, RAP disclosure process
June 10	Adiabo & Okuku	PAP households	KIIs	15	Fair compensation, timing of payment, cultural site protection

5.2.2 Key Issues Raised During Engagement

During consultations, stakeholders expressed both expectations and concerns.

Directly Affected Communities (Adiabo Ikot Mbo Otu, Adiabo Esine Ufot, Ipuole Okuku)

- i Employment and Livelihoods: Communities expressed a strong expectation for local employment opportunities in construction, processing, and related services. Youth and women particularly sought assurance of quotas or affirmative programs.
- ii Land and Compensation: Concerns were raised about the possible loss of farmland and fishing grounds. Community leaders requested fair and transparent compensation, including livelihood restoration programs for affected farmers and households.
- iii Environmental Concerns: Stakeholders raised concerns about deforestation, waste disposal, and pollution of nearby rivers. Fisherfolk requested assurances that water quality would not be compromised.
- iv Infrastructure and Social Services: Communities sought improvements in access roads, electricity, and potable water, noting that the hub should not benefit only investors but also address local development needs.
- v Cultural and Social Values: Traditional leaders emphasized the need to protect sacred sites, cultural heritage, and community cohesion during project development.
- vi Governance and Transparency: NGOs and CSOs stressed the importance of an open and transparent engagement process, with accessible grievance channels to prevent conflicts.

Regulatory Agencies (Federal Ministry of Environment, Cross River State Ministry of Environment, SEPZ, LGAs)

- i Compliance with EIA and RAP: the regulators (FMEv) representative stressed the need for strict compliance with EIA and RAP regulations and proper documentation of consultations
- ii Biodiversity Conservation: The SAPz representative highlighted the importance of biodiversity conservation (retaining 12.5 ha green area at AIH and 6.5 ha at ATC) and climate-smart infrastructure (Executive Summary).
- iii Called for transparent monitoring and reporting of stakeholder engagement and grievance resolution (Section 11 Monitoring, Evaluation & Reporting).

5.3 Lessons Learned

1. Early engagement helped build goodwill and trust, especially with traditional institutions.
2. Women and vulnerable groups require targeted engagement as they often lack voice in mixed forums.
3. Some misinformation about land take circulated, underscoring the need for transparent and continuous information disclosure.
4. Regulatory agencies emphasized alignment with AfDB ISS and national EIA Act.

6 STAKEHOLDER ENGAGEMENT PRINCIPLES AND OBJECTIVES

Stakeholder engagement in the CR-SAPZ project is guided by internationally recognized principles of transparency, inclusivity, and accountability. It is not a one-off activity but a continuous and adaptive process that spans the project lifecycle. The purpose of this section is to outline the principles and objectives that form the foundation of all engagement efforts. These principles are rooted in Nigerian law, AfDB's Integrated Safeguards System (ISS), and IFC Performance Standard 1 on stakeholder engagement.

6.1 Guiding Principles

The CR-SAPZ project adopts internationally recognized principles of stakeholder engagement, adapted to the local context of Cross River State. The following principles shape all stakeholder engagement activities:

1. **Transparency and Accountability:** Transparency builds trust and ensures accountability to stakeholders, particularly host communities and project-affected persons (PAPs).
 - i Information will be shared openly with stakeholders in a timely manner.
 - ii Reports on consultations, grievances, and project performance will be disclosed.
2. **Inclusiveness and Equity:** Engagement must reflect the diversity of stakeholders. Special measures will be taken to ensure that women, youth, persons with disabilities (PWDs), and minority households are not left behind. Engagement forums will be designed to overcome barriers such as literacy, language, and mobility.
 - i All stakeholder groups particularly vulnerable populations such as women, youth, PWDs, and the elderly will have equal opportunities to participate.
 - ii Engagement will respect local cultural norms while promoting gender balance.
3. **Free, Prior, and Informed Consultation (FPIC):** The project commits to obtaining community inputs before critical decisions are made, ensuring that consent is based on full knowledge of potential impacts. This approach aligns with AfDB safeguard requirements and ensures respect for community rights and cultural values.
 - i Engagement will occur early, before major project decisions are finalized.
 - ii Communities will be provided adequate information to make informed contributions.
4. **Cultural Appropriateness:** Cultural sensitivity is central to effective engagement. Meetings and consultations will respect traditional leadership structures, local customs, and community calendars, including farming and festival seasons. Consultations will use local languages (Efik, Ibibio, and English) and culturally sensitive approaches (traditional rulers, elders' councils).

5. **Two-Way Dialogue:** Engagement will not be limited to information dissemination. Stakeholders will have opportunities to voice their concerns, influence decisions, and co-create solutions. Mechanisms such as focus groups, participatory monitoring, and grievance redress ensure that feedback loops are functional. Engagement will not be limited to information disclosure; it will encourage feedback and incorporate local perspectives into project planning and implementation.
6. **Conflict Sensitivity:** Given the potential for land disputes and resource competition, engagement will be designed to identify and mitigate conflict drivers. Neutral facilitators and grievance committees will play an active role in managing tensions and promoting peaceful coexistence. Engagement will proactively address potential disputes (e.g., over land or compensation) and promote peaceful resolution through dialogue.
7. **Continuous Engagement:** Engagement is not a one-off activity. It will take place throughout all phases of the project from pre-construction to decommissioning with adjustments based on emerging issues and feedback.

6.2 Objectives of Stakeholder Engagement

The objectives of the CR-SAPZ SEP are to:

- i Identify and map stakeholders to ensure no group is excluded.
- ii Promote understanding of the project by disclosing accurate, relevant, and timely information.
- iii Facilitate participation of stakeholders in decision-making processes, especially PAPs.
- iv Address and resolve grievances through a structured Grievance Redress Mechanism (GRM).
- v Enhance project ownership and support among communities and institutions.
- vi Build trust between the project, government, and stakeholders to minimize resistance and maximize benefits.

These objectives will be achieved through structured engagement activities that are monitored and adapted throughout the project lifecycle.

7 STAKEHOLDER ENGAGEMENT STRATEGY

The stakeholder engagement strategy defines the approach, methods, and tools through which the CR-SAPZ project (AIH and ATC) will maintain continuous and meaningful interaction with stakeholders. The strategy is designed to ensure that all relevant stakeholders — from host communities and project-affected persons (PAPs) to regulatory authorities and development partners — are engaged in a way that is inclusive, participatory, culturally sensitive, and responsive to their needs. This strategy builds on the principles and objectives outlined in Section 6, as well as the stakeholder mapping and analysis in Section 4. It provides a structured roadmap for engagement across the four phases of the project: pre-construction, construction, operation, and decommissioning.

The strategy balances two critical dynamics:

- Stakeholder interest: Communities and PAPs have high interest because of their livelihoods and wellbeing.
- Stakeholder influence: Government agencies, development partners, and traditional rulers exert significant influence over project acceptance and compliance.

7.1 Strategic Approach of Engagement

The engagement approach is anchored in three key dimensions:

- i Proactive Communication: Engagement will begin early and provide timely disclosure of relevant information, including project risks, benefits, and mitigation measures.
- ii Participatory Dialogue: Engagement will go beyond information dissemination to facilitate two-way dialogue, allowing stakeholders to influence project outcomes.
- iii Adaptive Management: The engagement process will be continuously monitored and adapted based on stakeholder feedback and emerging issues.

Methods and Tools of Engagement

A variety of methods will be used depending on the audience, literacy levels, and nature of information:

- i Community town hall meetings (open forums for discussion).
- ii Focus Group Discussions (FGDs) (targeted engagement with women, youth, fisherfolk, etc.).
- iii Key Informant Interviews (KIIs) with leaders, health workers, and religious institutions.
- iv Workshops and training sessions with government officials, NGOs, and CSOs.
- v Print and digital materials (brochures, posters, newsletters, and social media).
- vi Mass media (local radio broadcasts in Efik and Ibibio for wider reach).
- vii Project liaison office at the site with Community Liaison Officers (CLOs).

7.2 Engagement by Project Phase

7.2.1 Pre-Construction Phase

During this phase, engagement is focused on awareness-raising, consultation, and disclosure of key documents such as the ESIA and Resettlement Action Plan (RAP). Activities include:

- i Public consultations in host communities to explain project objectives, anticipated impacts, and mitigation measures.
- ii Disclosure of ESIA findings in accessible formats (e.g., town hall meetings, local radio announcements, flyers in local languages).
- iii Establishment of grievance redress mechanisms (GRM) and introduction of Community Liaison Officers (CLOs).
- iv Initial capacity-building for community representatives on engagement and monitoring.

The pre-construction phase is critical for building trust and clarifying expectations before physical works begin.

7.2.2 Construction Phase

Engagement during construction centers on managing impacts and maintaining community relations. Typical activities include:

- i Monthly community meetings to provide updates on construction schedules, traffic management, and environmental control measures.
- ii Ongoing consultations with PAPs regarding compensation and livelihood restoration.
- iii Training sessions on health and safety for local workers and contractors.
- iv Engagement with local government and regulatory bodies through joint monitoring exercises.

This phase often experiences the highest volume of grievances (e.g., noise, dust, employment disputes), making responsive communication and grievance handling critical.

7.2.3 Operation Phase

Once facilities are commissioned, engagement shifts toward sustainability, monitoring, and partnership building. Activities include:

- Bi-annual stakeholder forums to review operational performance, employment statistics, and community benefits.
- Disclosure of environmental and social monitoring reports (air, water, waste management, employment statistics).
- Partnerships with NGOs and CSOs to deliver social programs such as women/youth empowerment, skills development, and climate-smart agriculture.
- Periodic feedback surveys to assess satisfaction with project-community relations.

The operation phase is an opportunity to institutionalize long-term partnerships and deliver development co-benefits beyond immediate project outputs.

7.2.4 Decommissioning Phase

Engagement at this stage will focus on exit planning and legacy management. Activities include:

- Advance consultations on decommissioning plans, including repurposing of facilities or restoration of land.
- Final disclosure of environmental closure reports and rehabilitation commitments.
- Collaborative decision-making on community benefits post-project (e.g., handover of infrastructure, training centers).
- Formal closure meetings with host communities and regulatory agencies.

This phase ensures that the project exits responsibly and leaves behind a positive legacy.

7.3 Frequency of Engagement Activities

The frequency of engagement activities will vary by project phase and stakeholder group. For example:

- Community meetings: monthly during construction, quarterly during operation.
- Technical workshops: annually for regulators and development partners.
- Disclosure activities: at least bi-annually or when major milestones are reached.
- Grievance handling: continuous, with responses provided within specified timelines.

A detailed table of the frequency of engagement activities by project phase is presented in Table 10

Table 10: Frequency of Engagement Activities by Project Phase

Engagement Activity	Pre-Constructi on	Constructi on	Operatio n	Decommiss ioning	Category of Stakeholders
Community town hall meetings in Okuku and Adiabo	Quarterly	Monthly	Bi-annually	Quarterly	Host communities, traditional leaders; women/youth groups; vulnerable groups
Focus Group Discussions (FGDs)	Bi-monthly	Bi-monthly	Quarterly	As needed	Project Affected Persons (PAPs); landowners; tenants; local farmers
Key Informant Interviews (KIIs)	As required	Monthly	Semi-annually	As required	Local workers; youth associations; women's groups; CLOs
Stakeholder workshops (government/NGOs)	Twice before RAP	Bi-annually	Annually	Once before closure	Host communities, traditional leaders; women/youth groups; vulnerable groups
Household surveys & socio-economic updates	Once (baseline)	Mid-term survey	Every 2 years	Exit survey	PAPs
Disclosure of reports (ESIA, RAP, CSR)	At project start	Quarterly progress	Annual reports	Final decommissioning	PAPs, SAPZ, NGOSs, FMEV
Grievance redress committee meetings	Monthly	Monthly	Quarterly	Quarterly	Host communities, PAPs, vulnerable groups
Media/radio announcements	Monthly	Monthly	Quarterly	As needed	SAPZ, FMEv

8 INFORMATION DISCLOSURE

Information disclosure is the cornerstone of transparent and effective stakeholder engagement. For the CR-SAPZ project, information disclosure ensures that communities, regulatory agencies, and development partners receive accurate, timely, and accessible information about project activities, risks, opportunities, and mitigation measures. This section outlines the type of information that will be disclosed, communication channels, frequency of disclosure, and approaches to ensure accessibility — particularly for vulnerable groups such as women, youth, and persons with disabilities (PWDs).

The CR-SAPZ Project Implementation Unit (PIU) recognizes that timely, accessible, and accurate disclosure of information is not just a procedural requirement but a legal, ethical, and operational necessity.

This process ensures that:

- Communities and other stakeholders understand project objectives, activities, benefits, and risks.
- Stakeholders can make informed contributions to decision-making processes.
- The project complies with national legislation, AfDB Integrated Safeguards System (ISS), and IFC Performance Standard 1.

8.1 Objectives of Information Disclosure

1. Transparency – Provide all stakeholders with consistent, accurate, and complete information about the project.
2. Accountability – Ensure that project actions can be monitored by stakeholders against stated commitments.
3. Empowerment – Enable stakeholders to make informed decisions and actively engage in the project process.
4. Risk Management – Reduce misinformation, rumors, and potential conflicts by proactively sharing information.
5. Compliance – Meet the disclosure requirements of Nigerian law, AfDB, IFC, and other financiers.

8.2 Types of Information to be Disclosed

Disclosure will cover both technical documents and operational updates, tailored to the audience's level of understanding. Examples include:

8.2.1 Technical and Regulatory Documents

- i Environmental and Social Impact Assessment (ESIA) report.
- ii Environmental and Social Management Plan (ESMP).

- iii Resettlement Action Plan (RAP).
- iv Stakeholder Engagement Plan (SEP).
- v Periodic monitoring reports (environmental audits, social performance reviews).

8.2.2 Project Implementation Information

- i Project objectives, scope, and timelines.
- ii Construction schedules and expected disruptions (e.g., noise, traffic diversions).
- iii Employment opportunities and recruitment processes.
- iv Community development initiatives and Corporate Social Responsibility (CSR) activities.

8.2.3 Grievance Redress Information

- i Details of the Grievance Redress Mechanism (GRM).
- ii Contact information of Community Liaison Officers (CLOs).
- iii Procedures and timelines for grievance submission and resolution.

8.3 Target Audiences for Disclosure

Different stakeholders require different levels of detail:

- i Host Communities: Need practical, accessible information about project impacts, benefits, and mitigation measures.
- ii Government Agencies: Require detailed technical documents for monitoring compliance.
- iii Development Partners (AfDB): Require structured reports aligned with safeguard frameworks.
- iv Civil Society and NGOs: Need transparency on social, environmental, and human rights issues.
- v General Public: Benefit from simplified updates through media and online platforms.

8.3.1 Methods and Channels of Disclosure

The project will employ multiple disclosure channels to ensure accessibility:

- i Community Meetings: Oral presentations in local languages, complemented with posters and charts.
- ii Local Media: Radio announcements, community newspapers, and television for mass outreach.

- iii Printed Materials: Flyers, fact sheets, and brochures distributed in markets, schools, and health centers.
- iv Digital Platforms: Project website, social media, and email lists for urban and tech-savvy stakeholders.
- v Government Notice Boards: Placement of official notices at local government offices.
- vi Public Disclosure Events: Official sessions where documents are presented and explained.

For vulnerable groups, disclosure will be tailored — for example, using visual aids and simplified language for low-literacy stakeholders, or ensuring accessible venues for persons with disabilities.

8.3.2 Frequency of Disclosure

- i Pre-Construction Phase: One-off disclosure of ESIA, RAP, and SEP, followed by ongoing updates.
- ii Construction Phase: Monthly updates on progress, impacts, and mitigation measures.
- iii Operation Phase: Bi-annual reports on environmental and social performance, alongside annual stakeholder forums.
- iv Decommissioning Phase: Disclosure of closure plans and environmental restoration measures at least 12 months before closure activities begin.

8.3.3 Responsibilities for Disclosure

- i PIU Safeguards Unit: Preparation and validation of disclosure materials.
- ii Community Liaison Officers (CLOs): Local dissemination of information and facilitation of community meetings.
- iii Contractors: Disclosure of construction schedules and potential disruptions.
- iv Development Partners: Oversight and review of disclosure processes for compliance with safeguard policies.

8.3.4 Monitoring and Feedback on Disclosure

Disclosure effectiveness will be assessed through:

- i Attendance lists at meetings.
- ii Stakeholder satisfaction surveys.
- iii Independent monitoring by NGOs or third-party evaluators.
- iv Review of grievance submissions to determine whether issues arise from poor disclosure.

9 ROLES AND RESPONSIBILITIES

Effective implementation of the Stakeholder Engagement Plan (SEP) requires clarity in roles and responsibilities. Engagement is not the duty of one institution alone, but a shared responsibility among the CR-SAPZ PIU, government agencies, contractors, development partners, community representatives, and independent monitors. This section outlines institutional arrangements for SEP implementation, ensuring accountability, efficiency, and transparency.

9.1 Institutional Responsibilities

9.1.1 CR-SAPZ Project Implementation Unit (PIU)

The PIU serves as the central body responsible for planning, implementing, and monitoring stakeholder engagement activities. Its responsibilities include:

- i Overall coordination of the SEP.
- ii Maintaining a Stakeholder Engagement Register.
- iii Employing and supervising Community Liaison Officers (CLOs).
- iv Ensuring compliance with AfDB and national safeguard requirements.
- v Producing quarterly and annual engagement reports.
- vi Convening stakeholder workshops and review meetings.

9.1.2 Community Liaison Officers (CLOs)

CLOs act as the direct link between the project and host communities. Their responsibilities include:

- i Daily interface with PAPs, farmers, youth, and women's groups.
- ii Managing grievance submissions at the community level.
- iii Providing timely project updates in local languages.
- iv Documenting community feedback and reporting to the PIU.
- v Assisting in organizing consultations, FGDs, and information sessions.

9.1.3 Contractors and Subcontractors

Construction contractors will also play a role in stakeholder engagement:

- i Ensuring compliance with the Code of Conduct for labor influx.
- ii Designating a Community Relations Supervisor to coordinate with CLOs.
- iii Disclosing work schedules, traffic diversions, and safety measures.

- iv Addressing worker–community disputes in collaboration with the PIU.

9.1.4 Community Institutions

Traditional and community-based structures are vital in engagement:

- i Traditional rulers and elders: Gatekeepers for community acceptance, custodians of cultural values.
- ii Village councils and town unions: Platforms for community mobilization.
- iii Women and youth groups: Channels for grassroots participation.
- iv Religious leaders: Influential in shaping perceptions and conflict resolution.

9.1.5 Government Agencies

- i Federal Ministry of Environment (FMEnv): Review and approve ESIA; monitor compliance.
- ii NESREA: Oversight on environmental standards.
- iii Cross River State Ministry of Environment (CRMEnv): State-level monitoring and coordination.
- iv State Ministries of Agriculture, Health, and Works: Support on value chains, public health, and infrastructure.
- v Odukpani Local Government Authority (LGA): Liaison with local communities and land matters.

9.1.6 Development Partners

The AfDB act as financiers and safeguard monitors. Their role includes:

- i Reviewing and approving the SEP.
- ii Ensuring compliance with international safeguard requirements.
- iii Conducting supervision missions and stakeholder validation workshops.
- iv Providing technical assistance for capacity building.

9.1.7 Independent Monitors and NGOs

To enhance transparency, independent monitors and NGOs will:

- i Conduct third-party monitoring of engagement activities.
- ii Provide impartial reports on stakeholder satisfaction.
- iii Advocate for vulnerable and marginalized groups.

- iv Verify grievance redress effectiveness.

Table 14: Summary of Roles and Responsibilities

Actor	Role
CR-SAPZ PIU	Overall coordination; reporting; safeguard compliance.
CLOs	Day-to-day liaison; grievance handling; grassroots communication.
Contractors	Information disclosure on works; labour–community relations.
Traditional rulers & elders	Cultural gatekeepers; conflict resolution.
Community groups (women, youth)	Participation in consultations; feedback on livelihoods and jobs.
FMEEnv/NESREA/CRMEEnv	Regulatory oversight; compliance monitoring.
Odukpani LGA	Facilitation of land and local government-community interface.
AfDB	Safeguards compliance; financial oversight; supervision missions.
NGOs & Independent monitors	Third-party monitoring; advocacy for vulnerable groups.

9.2 Capacity Building to Support Responsibilities

Recognizing that effective engagement depends on the capacity of institutions and individuals, the project will invest in training and knowledge-sharing. Capacity-building programs will focus on:

- i Equipping CLOs with skills in conflict resolution, participatory facilitation, and reporting.
- ii Training PIU staff in grievance redress procedures and safeguard compliance.
- iii Sensitizing contractors on cultural protocols and community relations.
- iv Building awareness among community representatives on their rights and roles in the engagement process.

This ensures that responsibilities are not only assigned but can be effectively executed.

9.3 Resource Allocation

9.3.1 Financial Resources

Adequate budgetary allocation is critical to sustaining meaningful stakeholder engagement. Resources will be earmarked for:

- i Organizing community consultations, focus groups, and disclosure meetings.
- ii Producing communication materials (flyers, posters, radio announcements, translation into local languages).

- iii Capacity-building programs for CLOs, PIU staff, and community representatives.
- iv Operation of the Grievance Redress Mechanism (GRM), including grievance logging systems and resolution committees.
- v Independent monitoring and third-party audits of stakeholder engagement performance.

An indicative budget is provided in Section 13 (Budget), ensuring transparency and accountability in how engagement costs are projected and disbursed.

9.3.2 Human Resources

Effective engagement requires a dedicated team with diverse skill sets, including:

- i Community Liaison Officers (CLOs) for day-to-day interaction with communities.
- ii Environmental and Social Safeguards Specialists within the PIU.
- iii Communication specialists to manage information disclosure and media relations.
- iv Contractors' environmental and social officers to ensure compliance on worksites.

9.3.3 Technical Resources

Beyond funding and personnel, engagement activities also require technical inputs, such as:

- i ICT tools (databases for stakeholder records, grievance tracking systems).
- ii Audio-visual aids for communication in low-literacy communities.
- iii Monitoring templates and reporting frameworks to standardize feedback collection.

9.4 Implications for SEP Implementation

The resource and responsibility framework ensure that engagement activities are institutionalized, funded, and monitored, rather than treated as ad hoc measures. It provides confidence to stakeholders that commitments made in the SEP will be followed through with the required personnel, funding, and accountability structures.

10 GRIEVANCE REDRESS MECHANISM (GRM)

A transparent and effective Grievance Redress Mechanism (GRM) is vital for maintaining trust, preventing conflict, and ensuring accountability throughout the CR-SAPZ project (AIH and ATC). The GRM provides project-affected persons (PAPs) and other stakeholders with a formal channel to raise complaints, seek resolution, and receive feedback in a fair, culturally sensitive, and timely manner. The GRM is designed to complement existing traditional dispute resolution systems while aligning with international best practices such as the AfDB ISS, IFC Performance Standards, and Nigerian EIA Act requirements.

Its primary purpose is to provide a formal, transparent, and culturally appropriate process for receiving, assessing, and resolving grievances from all stakeholders particularly PAPs in a timely manner.

A well-functioning GRM:

- Strengthens trust between the Project Implementation Unit (PIU) and stakeholders.
- Reduces risks of conflict and potential delays in project implementation.
- Ensures compliance with Nigerian law, AfDB ISS (Operational Safeguard 1), and IFC Performance Standard 1.
- Provides an early warning system to identify and address issues before they escalate.

10.1 Objectives of the GRM

The main objectives of the GRM are to:

1. Provide PAPs and stakeholders with accessible and culturally appropriate mechanisms to voice grievances.
2. Resolve disputes in a fair, transparent, and timely manner.
3. Strengthen trust between the PIU, contractors, and communities.
4. Minimize project delays and risks arising from unresolved conflicts.
5. Generate data for monitoring and continuous improvement of engagement.

10.2 Guiding Principles of the GRM

The CR-SAPZ GRM will be guided by the following principles:

1. Accessibility – Available to all stakeholders, including vulnerable and marginalized groups, at no cost.
2. Transparency – Clear procedures, roles, and timelines that are communicated to stakeholders.
3. Fairness and Equity – All grievances will be treated impartially without discrimination.
4. Confidentiality – Identities of complainants will be protected when requested.
5. Timeliness – Complaints will be resolved within agreed timelines to avoid unnecessary delays.

6. Cultural Appropriateness – Process will respect local customs, authority structures, and languages.
7. Non-Retaliation – Complainants will be protected from any form of retaliation for raising issues.
8. Feedback Loop – Complainants will be informed of actions taken and outcomes.

10.3 Scope of Grievances

The GRM will address a wide range of issues, including but not limited to:

- i Land acquisition and compensation: Disputes over valuation, eligibility, or payment.
- ii Construction impacts: Dust, noise, vibration, traffic safety, waste disposal.
- iii Employment and labor: Recruitment fairness, working conditions, wages.
- iv Community health and safety: Risks of accidents, sanitation, disease outbreaks.
- v Environmental concerns: Water use, air pollution, biodiversity impacts.
- vi Social issues: Gender inclusion, treatment of vulnerable groups, cultural heritage.
- vii Contractor misconduct: Worker–community disputes, code of conduct violations.

10.4 Grievance Uptake Channels

Multiple entry points will be provided so that all stakeholders — regardless of literacy, mobility, or social status — can lodge grievances. These include:

- i Community Liaison Officers (CLOs): In-person reporting during community visits or at CLO offices.
- ii Grievance Boxes: Secure boxes placed at strategic locations such as community halls and local government offices.
- iii Hotlines and SMS Platforms: Dedicated mobile numbers for voice calls and text messages.
- iv Email and Online Platforms: For stakeholders with internet access.
- v Traditional Leaders: Community members may report grievances through chiefs or elders, who will forward them to the CLOs.

10.5 GRM Structure and Levels of Resolution

The GRM will operate at four escalating levels to ensure issues are resolved at the lowest possible level:

10.5.1 Level 1 – Community Level (Informal Resolution)

- First point of contact: Community Liaison Officer (CLO) or Community Grievance Committee (CGC).
- Aim: Resolve grievances quickly and informally within 7 working days.
- Method: Direct discussions, mediation by traditional leaders, on-the-spot solutions where possible.

10.5.2 Level 2 – PIU Level (Formal Resolution)

- If unresolved at Level 1, the complaint is recorded in the GRM Register and reviewed by the PIU Safeguards Team.
- Timeframe: Investigation and resolution within 14 working days.
- Method: Field visits, stakeholder meetings, technical assessments.

10.5.3 Level 3 – Project Steering Committee (Escalation)

- If unresolved at PIU level, the grievance is escalated to the Project Steering Committee (PSC), which includes representatives of government ministries, LGAs, and community leaders.
- Timeframe: Resolution within 21 working days.
- Method: Formal hearings, arbitration, or independent mediation.

10.5.4 Level 4 – External Remedies

- If complainants are unsatisfied, they may seek legal redress through Nigerian courts or approach the AfDB's Independent Review Mechanism (IRM).

The GRM will assist complainants with documentation needed for external cases.

10.6 Grievance Handling Process

The grievance resolution process will follow a clear sequence of steps:

10.6.1 Step 1: Receipt and Acknowledgement

- Grievances are received through any channel and logged by the CLO in a Grievance Register (see grievance lodgement form in Appendix 1V).
- Complainants receive an acknowledgement slip within 48 hours, confirming that the grievance has been recorded.

10.6.2 Step 2: Screening and Classification

- The grievance is classified based on its type (e.g., environmental, social, compensation-related, labor, GBV/SEA).
- Minor grievances may be resolved immediately by the CLO, while complex cases are escalated to the PIU Safeguards Unit.

10.6.3 Step 3: Investigation and Resolution

- The PIU Safeguards Unit, with support from contractors and local authorities, investigates the grievance.
- Stakeholders involved are consulted, and evidence is gathered.

- Resolution options are discussed with the complainant, ensuring agreement on corrective actions.

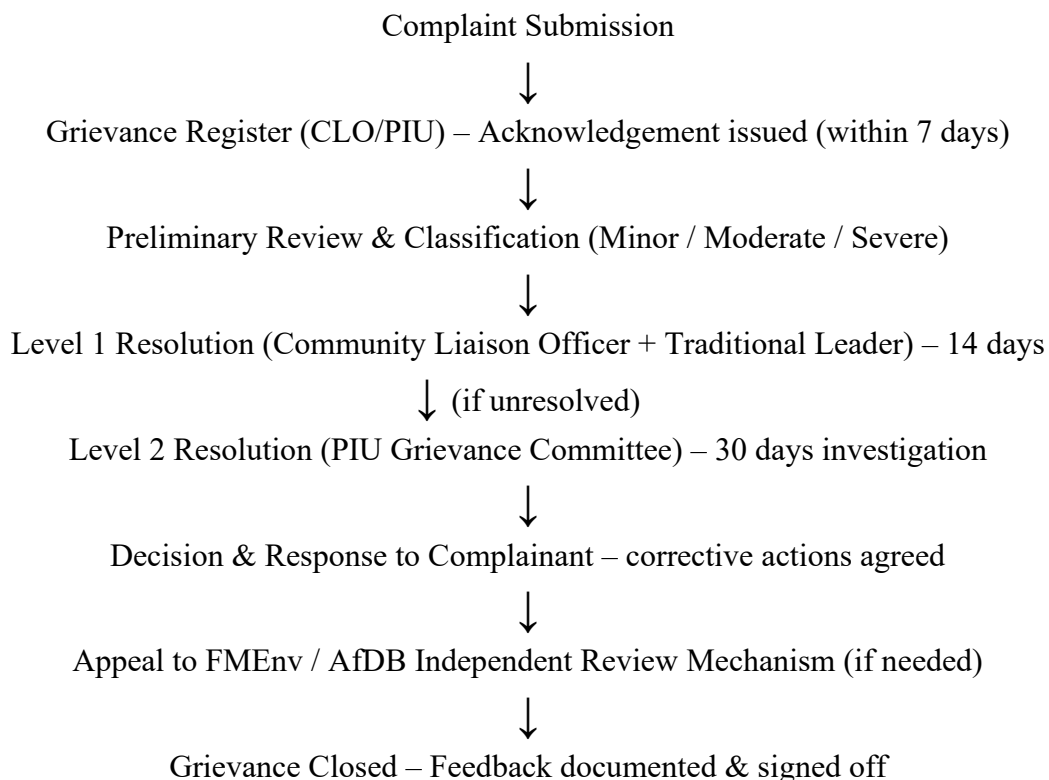
10.6.4 Step 4: Implementation of Resolution

- Agreed corrective actions are implemented promptly (e.g., repairing damage, paying compensation, adjusting work schedules).
- In sensitive cases such as GBV/SEA, referrals will be made to specialized service providers in line with survivor-centered protocols.

10.6.5 Step 5: Feedback and Closure

- The complainant is informed of the resolution and asked to confirm satisfaction.
- Once confirmed, the case is marked as closed in the Grievance Register.
- If the complainant is not satisfied, the grievance is escalated to higher levels, including regulatory authorities or courts if necessary.

Flowchart of the GRM Process



10.7 Institutional Roles in the GRM

- i Community Liaison Officers (CLOs): First point of contact, grievance logging, and resolution of minor issues.

- ii PIU Safeguards Unit: Oversight of grievance management, resolution of complex cases, and reporting to financiers.
- iii Grievance Committees: Multi-stakeholder bodies including community representatives, traditional leaders, and government officials to deliberate on sensitive grievances.
- iv Contractors: Responsible for addressing grievances related to construction impacts, workforce behavior, and safety.
- v External Monitors: NGOs or independent experts may be engaged to review grievance handling performance.

10.8 Communication and Awareness of GRM

To ensure stakeholders know about and can access the GRM:

- GRM procedures will be explained during all stakeholder meetings.
- Flyers, posters, and radio announcements in Efik, Ibibio, and English will publicize the process.
- Contact details for CLOs, PIU offices, and hotline numbers will be widely distributed.

10.9 Grievance Redress Timeline

- i Acknowledgement of grievance: within 48 hours.
- ii Initial assessment and classification: within 5 working days.
- iii Resolution of simple cases: within 14 days.
- iv Resolution of complex cases: within 30 days.
- v Escalation to external mediation: after 30 days if unresolved.

10.10 Monitoring and Reporting of Grievances

The PIU will maintain a centralized grievance database to track all cases, including details of the complainant, nature of grievance, actions taken, and outcomes. Quarterly grievance reports will be shared with stakeholders and financiers, highlighting:

- i Number and types of grievances received.
- ii Resolution rates and timelines.
- iii Outstanding cases and reasons for delay.
- iv Lessons learned and corrective actions.

11 MONITORING, EVALUATION, AND REPORTING

Monitoring and reporting are critical to ensuring that the Stakeholder Engagement Plan (SEP) is implemented effectively and delivers on its objectives. For the CR-SAPZ project, which involves diverse stakeholders with varying levels of interest and influence, continuous monitoring is necessary to assess whether engagement is inclusive, transparent, and responsive. Reporting, in turn, provides accountability to stakeholders, financiers, and regulatory bodies by documenting what has been achieved, what challenges remain, and how corrective actions are being applied.

This section outlines the monitoring framework, key performance indicators (KPIs), reporting mechanisms, and feedback loops that will ensure learning and adaptive management throughout the project lifecycle. A robust MER framework will:

- Track progress of stakeholder engagement activities against planned actions.
- Measure outcomes to determine whether engagement is building trust and reducing conflict.
- Ensure accountability to affected communities, regulators, and financiers such as the African Development Bank (AfDB).
- Support adaptive management by allowing the CR-SAPZ PIU to modify approaches based on evidence and feedback.

11.1 Objectives of Monitoring and Reporting

The monitoring and reporting framework is designed to:

- i Assess whether stakeholder engagement activities are being implemented as planned.
- ii Measure the effectiveness of engagement in terms of inclusivity, responsiveness, and stakeholder satisfaction.
- iii Provide early warning of emerging risks or conflicts related to engagement.
- iv Document lessons learned and apply them to strengthen future engagement.
- v Demonstrate compliance with Nigerian regulatory requirements and AfDB safeguard standards.
- vi Enhance accountability to affected communities, government institutions, and development partners.

11.2 Monitoring Framework

The monitoring framework will be based on quantitative and qualitative indicators, collected through structured tools such as attendance registers, grievance logs, feedback surveys, and independent audits. Monitoring will occur at three levels:

- i Activity Monitoring: Tracking whether planned activities such as public consultations, disclosure sessions, and grievance redress forums have been carried out according to schedule.

- ii Process Monitoring: Assessing whether activities are being conducted in line with the principles of transparency, inclusivity, and respect for culture (as outlined in Section 6).
- iii Outcome Monitoring: Evaluating whether engagement is producing the intended results such as improved trust, reduced grievances, timely conflict resolution, and greater community ownership.

11.3 Key Performance Indicators (KPIs)

Indicators are SMART (Specific, Measurable, Achievable, Relevant, Time-bound) and linked to Sections 6–10 of this SEP as indicated in Table 11. The following KPIs will guide monitoring:

- i Number of consultations and disclosure meetings conducted by project phase.
- ii Percentage of women, youth, and vulnerable groups participating in engagement activities.
- iii Number of grievances received, resolved, and pending (disaggregated by type and stakeholder group).
- iv Average time taken to resolve grievances.
- v Stakeholder satisfaction levels based on periodic surveys.
- vi Number of capacity-building sessions held for CLOs, PIU staff, and community representatives.
- vii Compliance rate of contractors with engagement and grievance protocols.

Table 11: Key Performance Indicators (KPIs)

Area	Indicator	Target/Standard	Frequency	Data Source	Responsible Entity
Stakeholder Meetings	No. of town halls, FGDs, KIIs, workshops conducted	≥90% of planned events	Monthly	Engagement logs, attendance registers	CLOs, PIU Safeguards Team
Inclusiveness	% participation of women, youth, and vulnerable groups	≥40% women, ≥20% youth, ≥5% PWDs	Quarterly	Attendance data	CLOs, M&E Officer
Information Disclosure	Timeliness of ESIA, RAP, progress updates	100% within required timelines	Quarterly	Disclosure calendar	PIU Safeguards Team
GRM Performance	No. of grievances received and resolved	≥80%	Monthly	GRM register	CLOs, PIU

Area	Indicator	Target/Standard	Frequency	Data Source	Responsible Entity
	within timelines				
Stakeholder Satisfaction	% of stakeholders rating engagement as satisfactory	≥75%	Bi-annual	Satisfaction surveys	Independent Monitor
Conflict Prevention	No. of disputes escalated beyond Level 2 of GRM	<10 per year	Quarterly	GRM data	PIU

11.4 Reporting Mechanisms

Reporting will occur at multiple levels and timeframes:

11.4.1 Internal Reporting

- CLOs will submit monthly reports to the PIU Safeguards Unit summarizing community interactions, grievances, and resolutions.
- The Safeguards Unit will consolidate these into quarterly internal reports for project management.

11.4.2 External Reporting

- Quarterly progress reports will be shared with key stakeholders, including regulatory agencies and local government.
- Semi-annual reports will be submitted to development partners (AfDB) covering stakeholder engagement performance, challenges, and corrective actions.
- Annual stakeholder engagement reports will be prepared for disclosure to the public and host communities.

11.4.3 Community Feedback Sessions

- Bi-annual feedback meetings will be organized in host communities where monitoring findings are presented in accessible formats (charts, infographics, oral presentations).
- Feedback from these sessions will be documented and integrated into the next cycle of engagement activities.

11.4.4 Feedback and Adaptive Management

Monitoring and reporting will not only generate data but also enable adaptive management. Lessons from each reporting cycle will be used to:

- Adjust engagement methods (e.g., shifting from town halls to smaller focus groups if participation is low).
- Strengthen capacity-building for CLOs and contractors if gaps are observed.
- Improve the grievance mechanism if resolution rates are lagging.
- Reallocate resources to ensure more effective engagement in underperforming areas.

11.5 Roles and Responsibilities in Monitoring

- i PIU Safeguards Unit: Overall responsibility for monitoring framework design, data consolidation, and external reporting.
- ii Community Liaison Officers (CLOs): Primary data collectors at community level, responsible for logging grievances, attendance, and feedback.
- iii Contractors: Required to report on engagement and grievance management linked to construction activities.
- iv Development Partners: Oversight through supervision missions and independent validation of reports.
- v Independent Monitors (NGOs/Consultants): May be engaged periodically to assess SEP performance and provide objective evaluations.

11.6 Indicators of Success

The success of the monitoring and reporting framework will be judged by:

- i High levels of community participation across demographics.
- ii Increased trust in the project, reflected in fewer escalated disputes.
- iii Timely and transparent reporting to all relevant stakeholders.
- iv Demonstrable evidence that stakeholder input is influencing project decisions.

12 CAPACITY BUILDING AND TRAINING

The successful implementation of the Stakeholder Engagement Plan (SEP) for the CR-SAPZ depends heavily on the skills, knowledge, and commitment of all actors involved in engagement. Capacity building ensures that Project Implementation Unit (PIU) staff, Community Liaison Officers (CLOs), contractors, and community representatives are adequately trained to fulfil their roles in an inclusive, transparent, and effective manner. Capacity building also promotes sustainability by empowering local actors to manage engagement and grievance processes beyond the lifespan of the project.

Capacity building and training are therefore integral components of the SEP to ensure:

- Engagement is consistent, culturally appropriate, and inclusive.
- Information disclosure is clear, accurate, and timely.
- The Grievance Redress Mechanism (GRM) is understood, trusted, and used effectively.
- Monitoring and reporting processes are accurate, complete, and compliant with legal and lender requirements.

12.1 Objectives of Capacity Building

The capacity building program aims to:

1. **Enhance Skills:** Equip project staff, CLOs, contractors, and community representatives with skills in communication, facilitation, and conflict resolution.
2. **Ensure Compliance:** Train all responsible actors on the AfDB Integrated Safeguards System (ISS), IFC Performance Standards, and Nigerian environmental and social laws.
3. **Improve Responsiveness:** Strengthen the ability of field teams to identify, document, and address stakeholder concerns promptly.
4. **Promote Inclusivity:** Ensure engagement processes actively involve women, youth, persons with disabilities (PWDs), and other vulnerable groups.
5. **Sustain Institutional Memory:** Build a knowledge base that remains in place even if personnel change during the project lifecycle.

12.2 Target Groups for Training

Capacity building will be tailored to the roles and responsibilities of each group:

- i **Project Implementation Unit (PIU):** The PIU Safeguards Unit will require capacity in monitoring and reporting, grievance management, participatory methods, and safeguard compliance. Training will focus on technical knowledge as well as leadership in managing relationships with diverse stakeholders.
- ii **Community Liaison Officers (CLOs):** CLOs will be the frontline actors in stakeholder engagement. They will require practical skills in conflict resolution, facilitation of

consultations, record keeping, grievance tracking, and communication in local languages.

- iii Contractors and Subcontractors: Contractor staff, particularly site managers and social officers, need to be trained on community relations, worker–community interactions, occupational health and safety communication, and compliance with engagement protocols.
- iv Community Representatives: Traditional leaders, women’s associations, youth groups, and representatives of vulnerable households will benefit from training on rights, roles in engagement, participatory monitoring, and how to use the grievance mechanism.

12.3 Training Content and Focus Areas

The capacity-building program will cover both technical and soft skills:

- i Stakeholder Engagement Fundamentals: Principles of inclusivity, transparency, and two-way communication.
- ii Grievance Redress Mechanism (GRM): Procedures, roles, timelines, and documentation.
- iii Participatory Monitoring and Evaluation (M&E): Tools for community-based monitoring.
- iv Conflict Resolution and Mediation Skills: Techniques for preventing and managing disputes.
- v Cultural Sensitivity and Gender Mainstreaming: Respecting local traditions and ensuring women and vulnerable groups participate.
- vi Communication Skills: Public speaking, use of visual aids, translation into local languages, and digital communication tools.
- vii Safeguard Compliance: AfDB requirements and Nigerian EIA regulations.

12.4 Training Delivery Approaches

To maximise effectiveness, training will use participatory and practical methods, including:

- i Workshops and Seminars: Facilitated by safeguard experts.
- ii On-the-Job Training: Mentoring of CLOs and PIU staff during consultations.
- iii Simulation Exercises: Role-playing grievance handling or consultation facilitation.
- iv Community Exchange Visits: Learning from other projects with similar engagement systems.
- v Refresher Training: Regular updates to ensure sustainability and adaptation to new challenges.

12.5 Indicative Training Plan

An indicative training plan is presented in Table 16. This plan is flexible and will be updated based on evolving needs and stakeholder feedback.

Table 12: Indicative Training Plan

Target Group	Training Topic	Delivery Method	Frequency	Responsible Entity
PIU Safeguards Unit	Safeguard compliance, monitoring & reporting	Workshops, expert sessions	Twice yearly	PIU / Development Partners
Community Liaison Officers (CLOs)	Conflict resolution, grievance handling, community facilitation	Workshops, role-play, mentoring	Quarterly	PIU Safeguards / NGOs
Contractors	Community relations, labor communication, OHS awareness	Toolbox talks, workshops	Monthly (during construction)	Contractors / PIU
Community Representatives	Rights, participatory monitoring, GRM access	Town hall training, visual aids	Twice yearly	CLOs / CSOs
Traditional Leaders & Women's Groups	Inclusive engagement, cultural mediation	Dialogue forums, exchange visits	Annual	PIU / CLOs

12.6 Monitoring Training Effectiveness

Capacity building will itself be subject to monitoring and evaluation to ensure impact. This will include:

- i Pre- and post-training assessments to measure knowledge gained.
- ii Participant feedback forms to improve delivery methods.
- iii Tracking application of skills in real consultations, grievance handling, and reporting.
- iv Independent evaluation by development partners during supervision missions.

12.7 Sustainability of Capacity Development

Beyond the project's implementation, the SEP's capacity-building component will help institutionalize skills at local and state level. This will ensure that government institutions, communities, and local organizations retain the ability to manage stakeholder relations and safeguard compliance even after project closure.

13 BUDGET FOR STAKEHOLDER ENGAGEMENT

Stakeholder engagement requires dedicated and sustainable financial resources to ensure that activities are carried out effectively throughout the project lifecycle. Without adequate funding, consultations, information disclosure, grievance redress, and capacity-building efforts may become inconsistent, leading to stakeholder dissatisfaction, conflicts, and potential delays in project implementation. This section provides an indicative budget for the implementation of the Stakeholder Engagement Plan (SEP) for the CR-SAPZ project. It outlines the key cost categories, indicative allocations by activity, and principles for financial management to ensure transparency, accountability, and efficiency.

13.1 Budget Objectives

The stakeholder engagement budget aims to:

- Provide sufficient resources to implement all engagement activities identified in the SEP.
- Ensure that vulnerable and marginalized groups are included through tailored communication and outreach.
- Cover both recurrent and one-off costs across the four project phases: pre-construction, construction, operation, and decommissioning.
- Facilitate grievance management, monitoring, and reporting systems.
- Strengthen capacity for project staff, contractors, and community representatives to carry out engagement responsibilities.

13.2 Budget Components

Human Resources

- Salaries and allowances for Community Liaison Officers (CLOs).
- Part-time honoraria for traditional leaders and community representatives.
- Engagement support staff (interpreters, rapporteurs).

Engagement Activities

- Organization of community meetings, focus groups, and stakeholder workshops.
- Transportation and logistics for PIU, CLOs, and participants.
- Refreshments and materials during consultations.

Information Disclosure

- Production of brochures, posters, and newsletters.
- Translation into local languages (Efik, Ibibio).
- Radio announcements and media slots.

Grievance Redress Mechanism (GRM)

- Establishment of grievance boxes and hotline.
- Stationery and documentation (registers, forms).
- Training of Grievance Committee members.

Capacity Building and Training

- Training workshops for PIU, CLOs, contractors, and community representatives.
- Engagement of NGOs/consultants as facilitators.
- Learning materials and handbooks.

Monitoring and Evaluation (M&E)

- Field monitoring visits.
- Independent verification by NGOs/third-party monitors.
- Annual evaluations and disclosure meetings.

13.3 Indicative Budget Estimate

Table 13 presents an indicative budget for SEP implementation.

Table 13: Indicative Budget for SEP Implementation

Budget Item	Estimated Annual Cost (₦)	Equivalent in USD (\$)	Activities
Human Resources (CLOs + support)	₦2,880,000	\$1,852	3 CLOs @ ₦80,000/month each + support staff (allowances, logistics)
Community Engagement Activities	₦7,000,000	\$4,502	Town halls, FGDs, workshops, logistics, refreshments
Information Disclosure	₦1,500,000	\$965	Posters, brochures, translations, media & radio broadcasts
Grievance Redress Mechanism (GRM)	₦8,000,000	\$5145	Establishment, grievance boxes, hotline, registers, forms, GRC meetings
Capacity Building & Training	₦4,000,000	\$2,572	Training workshops for PIU, CLOs, contractors, NGOs; learning materials
Monitoring & Evaluation (M&E)	₦5,000,000	\$3,215	Field monitoring, 3rd-party verification, annual evaluations
Contingency (10%)	₦2,850,000	\$1833	To cover unforeseen costs (inflation, extra engagement needs)
Total	₦31,230,000	\$20,084	Exchange Rate of ₦1555/1\$

13.4 Principles of Financial Management

The following principles will guide the management of the SEP budget:

- **Transparency:** All expenditures will be documented and included in financial reports.
- **Accountability:** The PIU Finance Unit will manage disbursement, with oversight from development partners.
- **Efficiency:** Resources will be used in a cost-effective manner, prioritizing methods that maximize outreach and impact.
- **Inclusivity:** Budget allocations will ensure engagement with marginalized groups, such as women, youth, and persons with disabilities.

- Flexibility: The contingency allocation allows for adaptive responses to emerging engagement needs.

13.5 Sustainability of Financing

The SEP budget will be integrated into the overall project financing plan and co-financed by the Government of Cross River State and development partners (AfDB). To ensure sustainability:

- Engagement costs will be considered recurring project costs, not one-off expenses.
- Local partnerships (with NGOs, CSOs, traditional leaders) will be leveraged to optimize costs.
- Community representatives will be supported to gradually take ownership of certain engagement functions (e.g., monitoring committees), reducing long-term dependency on project funds.

14 IMPLEMENTATION SCHEDULE AND MONITORING

An implementation schedule provides a time-bound roadmap for rolling out the Stakeholder Engagement Plan (SEP) across all phases of the CR-SAPZ project. This ensures that engagement is systematic, predictable, and continuous, rather than reactive. The schedule outlines when and how engagement activities will occur, assigns responsibilities, and aligns activities with the project lifecycle: pre-construction, construction, operation, and decommissioning.

The implementation schedule provides a roadmap of activities, timelines, responsibilities, and linkages to project milestones. It is designed to ensure that:

- i Engagement is continuous throughout the project lifecycle.
- ii Activities are phased to match key decision points.
- iii Responsibilities are clearly allocated to the PIU, CLOs, contractors, and other actors.
- iv Monitoring and adaptive adjustments can be made based on lessons learned.

14.1 Guiding Principles for Scheduling

- Engagement must begin before project works (early consultations).
- Frequency will increase during critical project phases (e.g., land acquisition, construction mobilization).
- Activities will be flexible to accommodate unforeseen challenges or stakeholder requests.
- Schedules must ensure inclusivity, allowing participation of women, youth, and vulnerable groups.

14.2 Key Milestones for Stakeholder Engagement

The SEP implementation schedule is presented in Table 14, and the schedule cuts across the phases of the project.

Pre-Construction Phase (Year 1)

- Disclosure of ESIA and RAP.
- Formation of Grievance Redress Committee (GRC).
- Initial capacity-building workshops for PIU, CLOs, and community reps.
- Community sensitization campaigns on project objectives.

Construction Phase (Years 1–3)

- Monthly community consultations on environmental and social impacts.
- Disclosure of quarterly environmental monitoring reports.
- Ongoing grievance handling and reporting.
- Annual capacity-building refreshers.

Operation Phase (Years 3–20)

- Bi-annual community feedback forums.
- Annual disclosure of CSR/community development activities.

- Continued functioning of GRM (quarterly reports).
- Engagement with private sector investors and SMEs on value chain integration.

Decommissioning Phase (Year 20+)

- Disclosure of closure and restoration plan.
- Consultation with PAPs and community representatives on facility handover.
- Exit surveys to assess long-term livelihood impacts.
- Grievance handling until all closure-related issues are resolved.

Table 14: SEP Implementation Schedule

Activity	Pre-Construction (Y1)	Construction (Y1–3)	Operation (Y3–20)	Decommissioning (Y20+)	Responsible Actor
Disclosure of ESIA/RAP	✓	–	–	–	PIU/CRMEnv
Establishment of GRM	✓	Continuous	Continuous	Until closure	PIU/CLOs/GRC
Community consultations	Quarterly	Monthly	Bi-annual	Quarterly	PIU/CLOs
Focus group discussions (women/youth)	Bi-monthly	Bi-monthly	Quarterly	As needed	CLOs/NGOs
Capacity building workshops	✓ (initial)	Annual refreshers	Every 2 years	Once before closure	PIU/AfDB/NGOs
Disclosure of monitoring reports	–	Quarterly	Bi-annual	Closure report	PIU/CRMEnv
CSR/community benefit disclosure	–	–	Annual	–	PIU/Investors
Independent monitoring	✓ (baseline)	Annual	Bi-annual	Final evaluation	NGOs/AfDB

14.3 Flexibility of Implementation

The schedule is indicative and will be updated annually. Stakeholder feedback will be used to revise the frequency, mode, or scope of engagement. For example, if grievances increase during construction, the frequency of community meetings may be doubled to restore trust.

14.4 Monitoring and Evaluation of SEP Implementation

Monitoring and Evaluation (M&E) of the Stakeholder Engagement Plan (SEP) is essential to ensure that the planned engagement activities are not only implemented but also achieve the desired results. While monitoring focuses on tracking activities and outputs, evaluation examines the effectiveness, relevance, inclusivity, and impact of stakeholder engagement efforts. For the CR-SAPZ Agro-Industrial Hub, a strong M&E framework is critical to building **trust, transparency, and accountability** with affected communities, government institutions, development partners, and the wider public.

14.4.1 Objectives of M&E

The M&E system for SEP implementation aims to:

- i Assess whether engagement activities are being implemented in line with the SEP commitments.
- ii Measure the effectiveness of information disclosure, consultations, and grievance redress mechanisms.
- iii Evaluate whether stakeholder feedback is being integrated into project decision-making.
- iv Track inclusivity by monitoring participation levels of vulnerable and marginalized groups.
- v Provide evidence for adaptive management and continuous improvement.
- vi Report progress to regulators, financiers (AfDB), and communities.

14.4.2 M&E Framework

The M&E framework will be structured along three dimensions:

14.4.2.1 Input and Activity Monitoring

This involves tracking the resources allocated and activities conducted, such as:

- Number of consultations and disclosure events conducted.
- Amount of funds spent on engagement activities compared to the budget.
- Number of staff and CLOs deployed for stakeholder engagement.

14.4.2.2 Process Monitoring

Process monitoring examines whether engagement activities are carried out in line with best practices and safeguard principles. Examples include:

- Quality of facilitation during community consultations.
- Accessibility of information to vulnerable groups.
- Timeliness and responsiveness of the grievance mechanism.

14.4.2.3 Outcome and Impact Evaluation

Evaluation will assess the results of engagement, such as:

- Improved trust between project and communities.
- Reduction in conflicts and grievances over time.
- Increased participation of women, youth, and marginalized groups.
- Evidence that stakeholder feedback influenced project design or mitigation measures.

14.4.3 Key Evaluation Questions

The evaluation component of the SEP will seek to answer questions such as:

- Are stakeholders receiving adequate and timely information?
- Are the grievance redress mechanisms accessible, fair, and effective?
- Has stakeholder engagement reduced project-related conflicts?
- Are women, youth, and vulnerable groups meaningfully involved in consultations?

- Are the allocated resources (financial, human, technical) sufficient and effectively used?
- What lessons can be drawn to improve engagement in future project phases?

14.4.4 Tools and Methods for M&E

A combination of quantitative and qualitative methods will be used, including:

- Attendance registers and disaggregated participation data (by gender, age, socio-economic group).
- Satisfaction surveys conducted periodically with community members.
- Focus group discussions and key informant interviews with traditional leaders, NGOs, and local government officials.
- Grievance database analysis to identify trends, hotspots, and systemic issues.
- Independent evaluations commissioned by development partners or external consultants.

14.5 Reporting and Feedback Loops

M&E findings will be systematically documented and reported:

- Quarterly M&E reports prepared by the PIU Safeguards Unit for internal use.
- Semi-annual evaluation briefs shared with development partners (AfDB).
- Annual public disclosure reports summarizing engagement results, grievances, and corrective actions for host communities.
- Community feedback sessions where evaluation results are presented in accessible formats and discussed openly.

This reporting process will ensure two-way communication, allowing stakeholders to validate findings and contribute to corrective actions.

14.6 Institutional Responsibilities for M&E

- PIU Safeguards Unit: Lead responsibility for designing and implementing the M&E framework.
- Community Liaison Officers (CLOs): Data collection at community level and reporting to the PIU.
- Contractors: Provision of regular engagement and grievance data linked to construction activities.
- Development Partners: Oversight and validation of SEP M&E results.
- Independent Monitors: External verification of SEP effectiveness and impact.

14.7 Indicators of Success

The SEP will be considered effective if:

- At least 70% of grievances are resolved within stipulated timeframes.
- Participation of women and vulnerable groups in consultations reaches at least 40%.

- Annual stakeholder satisfaction surveys show a progressive increase in trust towards the project.
- Monitoring results show a decline in conflicts and disputes compared to baseline.
- Project decisions reflect integration of stakeholder feedback in planning and implementation.

14.8 Adaptive Management

The M&E system is designed to be dynamic. Findings from evaluations will feed back into decision-making, allowing for adjustments in:

- Frequency or methods of consultations.
- Training and capacity-building needs.
- Allocation of resources to underperforming areas.
- Refinement of the grievance mechanism.

This ensures that the SEP remains relevant, responsive, and resilient throughout the project lifecycle.

15 CONCLUSIONS

The Stakeholder Engagement Plan (SEP) for the AIH in Adiabo, Odukpani LGA, and the ATC in Okuku, Yala LGA represents a comprehensive framework for ensuring that all project stakeholders including Project-Affected Persons (PAPs), community leaders, government agencies, contractors, and civil society are informed, consulted, and actively involved throughout the project lifecycle. It demonstrates the project's commitment to:

- i Inclusive participation of all stakeholders, particularly vulnerable groups.
- ii Transparency and accountability in information disclosure.
- iii Fairness in grievance handling through a structured GRM.
- iv Sustainability through capacity building, monitoring, and adaptive management.

The SEP also aligns with national regulatory requirements (EIA Act, NESREA regulations) and international standards (AfDB ISS, IFC PS1), ensuring both local and global credibility of the CR-SAPZ project.

Next Steps for Implementation

- i. Validation of SEP: The draft SEP will be shared with communities, regulators, and development partners for review and endorsement.
- ii. Institutional Setup: PIU will designate Safeguards Officers, recruit CLOs, and establish the Grievance Redress Committee.
- iii. Capacity Building: Initial training programs for PIU, CLOs, contractors, and community representatives will be rolled out.
- iv. Baseline Engagement: Pre-construction disclosure meetings and sensitization campaigns will commence.
- v. Integration into Project Management: SEP activities will be embedded into the CR-SAPZ operational and financial management systems.
- vi. Annual Review and Update: SEP will be reviewed annually, updated to reflect new challenges, lessons learned, and stakeholder feedback.

By integrating these elements, the SEP ensures that engagement is inclusive, culturally sensitive, gender-responsive, and adaptive to changing project realities. It is designed to reduce the risk of conflict, build mutual trust, and enhance the sustainability of the AIH and ATC projects.

Appendix II: Minute from the Engagement Meetings

STAKEHOLDER ENGAGEMENT /SCOPING WORKSHOP

DATE: Tuesday, 17th June 2025

VENUE: Hogis Hotel, Calabar, Cross River State

PROJECT: Proposed Agro-Industrial Hub Development

TIME: 10:30 AM

OPENING SESSION

Commencement:

The Stakeholders Engagement Workshop for the proposed Agro-Industrial Hub officially kicked off at 10:30 AM.

Opening Prayer:

The High Chief of the Adiabo Community offered an opening prayer, asking for wisdom for the discussion ahead.

Welcome & Purpose:

Dr. Basseyy welcomed the attendees and summarized the stakeholder engagement plan. He also oversaw the adoption of the engagement guide.

Opening Remarks:

A representative of the Ministry of Environment gave the opening remarks. Among the key points of his speech were:

- *The importance of implementing globally accepted best practices in the construction of the proposed Agro-Industrial Hub.*
- *The necessity of conducting a comprehensive Environmental and Social Impact Assessment (ESIA).*
- *Emphasis on ensuring that both socio-economic and environmental standards are met throughout the project's life cycle.*

TECHNICAL PRESENTATION

Presentation by Dr. Basseyy:

A thorough presentation on the ESIA activities and the stakeholder engagement process was given by Dr. Basseyy. His presentation covered:

- *The ESIA exercise objectives and scope.*
- *The essence of environmental safeguards is to ensure the long-term viability of projects.*
- *Overview of the project area, also he emphasized the unique environmental and social features.*
- *Justification for a thorough and participatory ESIA procedure to guarantee inclusivity and transparency.*
- *The expected results and benefits for the host community of the Agro-Industrial Hub project.*

INTERACTIVE SESSION (Q&A)

Question 1 – Ministry of Environment Representative (Dr. Musa Gashau)

- *Enquired as to whether the RAP enumeration process had already been completed or was still ongoing.*
- *Asked about the legal framework for grievance redress mechanisms.*
- *Raised concerns about the project's waste management plans.*
- *Requested clarification regarding the origin of livestock (exotic or local), how they are used (for export or domestic consumption), and the possibility of environmental and noise disturbance.*

- *Inquired about seasonal variations in the project's production pattern.*
- *Asked about the project's worker housing strategy and whether the ESIA would cover such a provision.*
- *Enquired about the environmental effects of power generation capacity.*
- *Enquired as to whether land acquisition for the project had received official approval.*

Question 2 – CRGIA Rep:

- *Voiced concern that the ESIA procedure had taken up too much of the conversation instead of the project's overall scope.*
- *Emphasised the necessity of regularising land ownership and ensuring that the Certificate of Occupancy (C of O) is not acquired outside legal procedures.*
- *Offered technical assistance to support the ESIA process by granting access to the Geographic Information System.*

Question 3 – High Chief of Okuku Community (HR Odaji P. Ipuole):

- *Enquired about the formal relationship that would exist between the community and the project.*
- *Asked for clarification on the concrete advantages and contingencies that the Agro-Industrial Hub would provide to the host community.*

RESPONSES & FEEDBACK

Dr. Bassey, the moderator, gave the following answers to the questions:

- *Enumeration has not commenced, but the host communities have been issued Notices of Entry.*
- *Enumeration will commence once fieldwork begins.*
- *The cut-off date for identifying Project Affected Persons (PAP) has been agreed upon by the host communities.*
- *The ESIA framework addresses waste management plans, livestock types, housing, and power generation*

Additional Comments:

- *A committee member underlined the necessity of effective sensitization in the larger community.*
- *A recommendation for organized sensitization exercises before the start of fieldwork was given by another community member.*

Comment and Observation: High Chief of Adiabo Community (HR Col. (Rtd) Moses Effiong):

- *Commend the presentation, indicating that the presentation offers sufficient information regarding the project procedure; however, he shared the concerns that he is hopeful that the project will see the light of day, considering the community's past experience with many projects that were initiated by never executed.*
- *Also, the High Chief called the attention of the proponent representative and the Cross River State government to the road linking to the project, suggesting the need for the road to be renovated for easy operation during and after the project.*

Observation: Obla Sunday (NESREA Representative)

- *Mr Sunday observed that the list of infrastructure, such as health and veterinary clinics, and the fire station that will be provided at the Okuku project was not listed for the Adiabo project, and he requested clarity on whether it was an omission or intentional.*

Observation: Gloria Ogban (CR-SAPZ Representative)

- Observed the absence of the Gender Action Management Plan from the listed management plans presented and encouraged the consultant to include such a plan in their activities to ensure gender equality across the project area.

Comment: Mr Ekpan (Director, Cross River Agric Extension)

- Mr. Ekpan commented that for every agricultural-related project activity in the state, an agricultural extension conference is carried out before the commencement of the project, and he hopes the proposed project will follow suit because such a conference helps to link the farmers to the project through extension efforts.

Comment: Solomon Ugo (UNICAL) and Bassey B. (NESREA Representative)

- Mr. Solomon enquired about the baseline data collection and wanted to know if the community are empowered towards the collection of data
- Mr. Bassey on the other enquired about the ESIA if the exercise is going to be generic or specific.

RESPONSES & FEEDBACK

Mr Enam (CR-SAPZ representative) gave the following answers to the questions:

- Appreciated all the stakeholders present at the workshop and encouraged everyone to be positive and give their total support to the project because the project will be executed, and it will benefit the state and the nation at large.
- Regarding the infrastructural differences across the project locations, it the posited that the project takes certain procedures and activities into consideration, which implies that the facilities at the two project locations will be different.
- Regarding Mr. Bassey's comment, the representative of the Federal Ministry of Environment indicated that the ESIA will be specific to suit the reality of the project environment.

CLOSING REMARKS

The workshop ended with appreciation to the various stakeholders for their active participation and ongoing collaboration in ensuring a successful ESIA and project execution. A dedication to transparency and compliance with standards was reaffirmed.

ACTION POINTS:

- Begin fieldwork and enumeration to identify Project Affected Persons (PAPs) of the host communities.
- Ensure proper documentation aligned with the agreed cut-off date.
- Clearly define the formal relationship structure between the project and the Adiabo community.
- Clarify the source (exotic vs. local) and purpose (domestic vs. export) of livestock. Include noise and environmental impact mitigation strategies in the ESIA.
- Ensure good road along the project area to ensure smooth operation during and after the project.

YALA LGA for ATC

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, Councilors, and Ipuole community leaders at Sanctus Hotel, Okuku, Yala LGA on the ATC project/ESIA by the ESIA Lead Consultant 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, Councilors 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 bring benefits to the</p>

Date	Participants	Type of Engagement	Issues Discussed and Comments
			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 Abasiyong 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. 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.

Appendix III: Attendance of stakeholder's engagement.

Cross River State Special Agro-Industrial Processing Zone Program

Environmental and Social Impact Assessment (ESIA) and preparation of Resettlement Action Plan (RAP) for Agro-Industrial Hub (AIH) at Tinapa Road, Adilabo and Agricultural Transformation Centre (ATC) at Okuku, Yala LGA, Cross River State

Stakeholders Engagement

Date 17 JUNE 2025 Venue HOGUS HOTEL, 7 AKIM CROSS STATE HOUSING, CALABAR Meeting Type STAKEHOLDERS ENGAGEMENT / SCOPING WORKSHOP

SN	Name	Community / Organization & Designation	Phone Number	Email address	Signature
1.	Acc. John Gabriel	NSCDC	07069027358	1kohn.gabriel@gmail.com	[Signature]
2.	LT(M) SA AMUSA	NIGERIAN NAVY	09033859110	adecolga.amsa@navy.mil.ng	[Signature]
3.	VAC J BASSBY	Nig. Customs	08067255639	bassbyjohn@customs.gov.ng	[Signature]
4.	Chief Okon Edet	Adilabo Ikat mbo Otu	08039178461	edet7729@gmail.com	[Signature]
5.	Chief Mary E. Nti	Adilabo Ikat mbo Otu	09032878327		[Signature]
6.	Mrs B. Bassby Edet	Adilabo Ikat mbo Otu	09035894976		[Signature]
7.	Mrs Veronica Ekpo Ebin	Esia Unit Adilabo	07013309723		[Signature]
8.	Prof Ekomo R. Akpan	UNIV. of Calabar	07032192266	ekomrmd@gmail.com	[Signature]
9.	Dr. M. P. V. M. P.	PGM	08965891212	vinl.mpe@pdm.gov.ng	[Signature]
10.	DR. MALACHI ABASI	PGM	08062155848	malachibasi@gmail.com	[Signature]
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13.	Dr. Udo Udo	PGM	08161518756	ukasc2014@gmail.com	[Signature]
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15.	Prof. Ekpo Ekpo	SAPZ (KMC)	09031112810	adilabomr@gmail.com	[Signature]

Cross River State Special Agro-Industrial Processing Zone Program

Environmental and Social Impact Assessment (ESIA) and preparation of Resettlement Action Plan (RAP) for Agro-Industrial Hub (AIH) at Tinapa Road, Adilabo and Agricultural Transformation Centre (ATC) at Okuku, Yala LGA, Cross River State

Stakeholders Engagement

Date 17 JUNE 2025 Venue HOGUS HOTEL, 7 AKIM CROSS STATE HOUSING, CALABAR Meeting Type STAKEHOLDERS ENGAGEMENT / SCOPING WORKSHOP

SN	Name	Community / Organization & Designation	Phone Number	Email address	Signature
1.	David Edin	CRGIA	08099350518	edinwid@yahoo.com	[Signature]
2.	David Edin				
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4.	Alfon Fredrick	SAPZ Accounts Office	07037467622	alfonfredrick@gmail.com	[Signature]
5.	Obelen Eliche Eju	SAPZ	08062890973	E30527@gmail.com	[Signature]
6.	Udo Anthony C.	Public Health	08038814668	uodanthony2@gmail.com	[Signature]
7.	Dr. Ombaka O. Afenwa	PGM	07054439308	ombaka@pdm.gov.ng	[Signature]
8.	Chief Oku Irok	Adilabo			[Signature]
9.					
10.					
11.					
12.					
13.					
14.					
15.					



Cross River State Special Agro-Industrial Processing Zone Program

Environmental and Social Impact Assessment (ESIA) and preparation of Resettlement Action Plan (RAP) for Agro-Industrial Hub (AIH) at Tinapa Road, Adilabo and Agricultural Transformation Centre (ATC) at Okuku, Yala LGA, Cross River State

Stakeholders Engagement

Date 17 JUNE 2025 Venue HOGIS HOTEL, 7 AKIM CLOSE, STATE HOUSE COMPOUND Meeting Type STAKEHOLDERS ENGAGEMENT SCOPING WORKSHOP

SN	Name	Community / Organization & Designation	Phone Number	Email address	Signature
1.	Dr. Musa Gashau	FHEW Abuja	0803341766	Musagashau@yahoo.com	Musa
2.	DOMINIC FRED KIRI	SEMA	0906255300	1147ENV1133@fcd	Dominic
3.	Prof. Mrs. I. Ugo E. Ukwais	CRIS	08051761784	lilianeng@35@gmail.com	I. Ugo E. Ukwais
4.	Chief Michael Eto	Adilabo	08061652451		Michael Eto
5.	Salomon Okon		08066163941		Salomon Okon
6.	Okon Edem	Adilabo	02059390594		Okon Edem
7.	Archibuteo Okondu	Adilabo	08032087747		Archibuteo Okondu
8.	Am. Dr. Fadi Okon	Yala	08127895990		Fadi Okon
9.	Joseph Okon	Adilabo	0805163946	Josephokon@gmail.com	Joseph Okon
10.	Chief (Col) Moses Effiong	Adilabo	08033075267	moseseffiong55@gmail.com	Moses Effiong
11.	Engr. Dr. Emay Egho	CA-SAPZ IE	08069016998	emayegho@gmail.com	Emay Egho
12.	Dr. Eyo D. D. Edeh	CA-SAPZ PGM	0807625203	eyodeh@ca.gov.ng	Eyo D. D. Edeh
13.	Chief Joseph Eto	Sup 4 works	0805996475	Josepheto@gmail.com	Chief Joseph Eto
14.	Mr. Emmanuel A. Bassey	NIWA	08034347089	emmanuelbassey@gmail.com	Emmanuel A. Bassey
15.	Chief Michael Eto	Adilabo	09036111298	Michaeleto@gmail.com	Chief Michael Eto

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Cross River State Special Agro-Industrial Processing Zone Program

Environmental and Social Impact Assessment (ESIA) and preparation of Resettlement Action Plan (RAP) for Agro-Industrial Hub (AIH) at Tinapa Road, Adilabo and Agricultural Transformation Centre (ATC) at Okuku, Yala LGA, Cross River State

Stakeholders Engagement

Date 17 June / 2025 Venue HOGIS HOTEL, 7 AKIM CLOSE, STATE HOUSE COMPOUND Meeting Type STAKEHOLDERS ENGAGEMENT SCOPING WORKSHOP

SN	Name	Community / Organization & Designation	Phone Number	Email address	Signature
1.	David Edim	CRGIA	08099350518	edimdaavid@yahomail.com	David Edim
2.	David Edim				David Edim
3.	Anton Eso Okor	Office of the SA Halls	08037912788	antongold@gmail.com	Anton Eso Okor
4.	Sam Edeh	SAPZ	07037467622	SamEdeh@gmail.com	Sam Edeh
5.	Chelen Egho Egho	SAPZ	08062890973	EghoEgho@gmail.com	Chelen Egho Egho
6.	Ude Anthony C.	Public Health	08038814668	udeanthony@gmail.com	Ude Anthony C.
7.	Dr. Omosisi O. Afana	PAM	07054439308	omosisi@pam.gov.ng	Dr. Omosisi O. Afana
8.	Chief Okunok	Adilabo			Chief Okunok
9.	Okwari Edutery	PGM	09064553618	OkwariEdutery@gmail.com	Okwari Edutery
10.	Bassey Uzodinma	PGM	08037155760		Bassey Uzodinma
11.	Stella Choban	PGM	08124253846	stellacl@gmail.com	Stella Choban
12.	Enagha Oji	PGM	08064012422	EnaghaOji@gmail.com	Enagha Oji
13.	Chief Olyana	PGM	04026544077	ChiefOlyana@gmail.com	Chief Olyana
14.	Chief Okunok	Adilabo			Chief Okunok
15.	Dr. Edeji Arolabi	PGM	09169604008	emohideji@pam.gov.ng	Dr. Edeji Arolabi

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Cross River State Special Agro-Industrial Processing Zone Program

Environmental and Social Impact Assessment (ESIA) and preparation of Resettlement Action Plan (RAP) for Agro-Industrial Hub (AIH) at Tinapa Road, Adlabo and Agricultural Transformation Centre (ATC) at Okuku, Yala LGA, Cross River State

Stakeholders Engagement

Date 16-June-2025 Venue Palace of the Obony of Calabar Meeting Type

SN	Name	Community / Organization & Designation	Phone Number	Email address	Signature
1.	HH Chief (Cal) P. Edet (PH)	Village Head	08032223635		[Signature]
2.	HH Chief Okon Oko	Adlabo	08136686374		[Signature]
3.	HH Chief Okon Oko	"	08165951790		[Signature]
4.	HH Chief Okon Edet	"	08039178461		[Signature]
5.	Chief Okon Edet	"			[Signature]
6.	Chief Michael Edet	Adlabo	08661652751		[Signature]
7.	Abasi O. Ogburn	SAPZ USSO	08037562803		[Signature]
8.	Emmanuel O.	PGM	08064024000	emmanuelo@pgram.com	[Signature]
9.	BRIAN E. EDET	public health	08066460516	edetbrian7@gmail.com	[Signature]
10.	Isidore Okon	enumeration	09026544077	Isidoreokon@gmail.com	[Signature]
11.	David Nson	CCCT	08063409025	Davidnson@gmail.com	[Signature]
12.	Dr. M. G. Nwankwo	PGM	08065591212	nmwankwo@gmail.com	[Signature]
13.	DR. MALACHI ABASODIWA	PGM	08032153848	malachiabaso@gmail.com	[Signature]
14.	Dr. Chinyere Anigbo	PGM	08161518756	chinyeranigbo@gmail.com	[Signature]
15.	Isidore Okon	PGM	08037544648	Isidoreokon@gmail.com	[Signature]

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Cross River State Special Agro-Industrial Processing Zone Program

Environmental and Social Impact Assessment (ESIA) and preparation of Resettlement Action Plan (RAP) for Agro-Industrial Hub (AIH) at Tinapa Road, Adlabo and Agricultural Transformation Centre (ATC) at Okuku, Yala LGA, Cross River State

Stakeholders Engagement

Date 17-JUNE-2025 Venue Hogis Hotel, 7 Akim Close, State House Complex Meeting Type Stakeholder Engagement

SN	Name	Community / Organization & Designation	Phone Number	Email address	Signature
1.	Dr. Musa Gasha	FMEV Abia	08033141766	musagasha@yahoo.com	[Signature]
2.	DOMINIC KESH	SEMA	08061553090	dominic.kesh@gmail.com	[Signature]
3.	Mrs. L. L. E. Ukwaga	CRIRS	08051761734	lilianagaga33@gmail.com	[Signature]
4.	Chief Michael Eto	Adlabo	08061652751		[Signature]
5.	Salomon Okon	Adlabo	08066153941		[Signature]
6.	Okon Edet	Adlabo	07059390596		[Signature]
7.	Chief Okon Oko	Adlabo	08032087747		[Signature]
8.	Am. Dr. Fadi Okon	PGM, Yala	08027895990		[Signature]
9.	Samuel Okon	PGM	08055163746	jesumilaka@gmail.com	[Signature]
10.	Chief (Cal) Moses Effiong	Adlabo Dist Mbr	08033078267	moseseffiong922@gmail.com	[Signature]
11.	Engr. Dr. Emay Ebe	CA-SAPZ IE	08069016498	emayebegbe@gmail.com	[Signature]
12.	Dr. Eyo D. D. Edet	PGM	08076252203	eyoedet52@yahoo.com	[Signature]
13.	Chief Joseph Eto	PGM	0805990475	jesepheto@gmail.com	[Signature]
14.	Emmanuel A. Bassey	NIWA	08034347089	emmanuelbassey@gmail.com	[Signature]
15.	Isidore Okon	PGM	09036111298	Isidoreokon@gmail.com	[Signature]

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Appendix IV: 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 inlanguage 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: