



---

**STAKEHOLDER HOLDER ENGAGEMENT PLAN (SEP)**

---

**THE KADUNA SPECIAL AGRO-INDUSTRIAL PROCESSING ZONES (SAPZ), KADUNA  
STATE, NIGERIA**



**OCTOBER 1, 2025**



**STAKEHOLDER HOLDER ENGAGEMENT PLAN (SEP)  
FOR**

**THE KADUNA SPECIAL AGRO-INDUSTRIAL PROCESSING ZONES (SAPZ),  
KADUNA STATE, NIGERIA**

**FINAL REPORT**

**OCTOBER, 2025**



## TABLE OF CONTENTS

TABLE OF CONTENTS.....	ii
LIST OF TABLES.....	v
LIST OF FIGURES.....	vii
EXECUTIVE SUMMARY.....	x
CHAPTER ONE- INTRODUCTION.....	1
1.0 Background.....	1
1.1 Purpose of the Stakeholder Engagement Plan (SEP).....	4
1.2 Project Overview.....	4
1.3 Objectives of the Stakeholder Engagement Plan.....	7
1.4 Justification for the SEP.....	8
1.5 Implementation Phases that Requires Stakeholders Engagement Plan.....	9
CHAPTER TWO: RISKS AND INDUCED IMPACTS OF THE SAPZ PROJECT THAT NECESSITATE STAKEHOLDERS' ENGAGEMENT PLAN (SEP).....	10
2.1 Introduction.....	10
2.2 Physical Displacement: Nature, Risk, and Implications.....	10
2.3 Economic Displacement.....	11
CHAPTER THREE: THE PROJECT ENVIRONMENT.....	19
3.1 Overview of the Project Influence Area.....	19
3.2 Size of Project Area.....	20
3.3 Biophysical and Socio-Economic Environment and Implications for SAPZ Implementation.....	22
CHAPTER FOUR: LEGAL AND REGULATORY FRAMEWORKS GUIDING THE STAKEHOLDER'S ENGAGEMENT PLAN.....	25
4.1 Nigerian Environmental Impact Assessment (EIA) Act cap E12 LFN, 2004.....	25
4.2 African Development Bank (AfDB) Operational Safeguard 10: Stakeholder Engagement and Information Disclosure.....	26
4.3 International Finance Corporation (IFC) Performance Standard.....	27
4.4 International Fund for Agricultural Development (IFAD) Social, Environmental and Climate Assessment Procedures (SECAP).....	29
CHAPTER FIVE: STAKEHOLDERS IDENTIFICATION AND ANALYSIS.....	30
5.1 Project Stakeholder Identification and Analysis.....	31
5.2 Primary, Secondary, and Tertiary Stakeholders.....	32
5.3 Stakeholder Influence–Interest Matrix.....	36
CHAPTER SIX-STAKEHOLDER ENGAGEMENT APPROACH AND PRINCIPLES.....	44
6.1 Inclusivity and Gender Sensitivity.....	45
6.2. Gender Sensitivity in Stakeholder Engagement.....	45



6.3. Culturally Appropriate Engagement .....	46
6.4. Accountability and Feedback Mechanisms .....	46
6.5 Free, Prior, and Informed Consultation (FPIC) .....	48
6.6 Vulnerable Group Engagement Strategy .....	52
CHAPTER SEVEN- ENGAGEMENT METHODS AND TOOLS .....	57
7.1 Public Consultations and Town Hall Meetings .....	57
7.2 Focus Group Discussions (FGDs) .....	62
7.3 Key Informant Interviews (KIIs) .....	65
7.4 Community Mapping and Participatory Rural Appraisal (PRA) Tools.....	66
CHAPTER EIGHT- STAKEHOLDER ENGAGEMENT SCHEDULE .....	70
8.1 Timeline by Project Phase (Planning, Construction, Operation).....	70
8.2 Frequency and Methods of Engagement.....	78
CHAPTER NINE - INFORMATION DISCLOSURE STRATEGY .....	81
9.1 Communication Channels and Languages.....	81
9.2. Languages for Communication.....	83
CHAPTER TEN-GRIEVANCE REDRESS MECHANISM (GRM) .....	89
10.1 GRM Structure and Tiers.....	89
10.4 Integration with the Grievance Redress Mechanism (GRC) .....	100
CHAPTER ELEVEN-. INSTITUTIONAL RESPONSIBILITIES .....	102
11.1 Project implementation Unit (PIU).....	102
11.2 Community Liaison Officers (CLOs) .....	105
CHAPTER TWELVE- INSTITUTIONAL RESPONSIBILITIES .....	118
12.1 Key Performance Indicators (KPIs).....	118
12.2 Stakeholder Feedback Mechanism .....	121
12.3 Adaptive Management .....	123
CHAPTER THIRTEEN-BUDGET AND RESOURCES .....	126
13.1. Engagement Costs.....	126
13.2 Financial Justification: .....	128
13.3 Capacity Building for Stakeholder Engagement.....	133
CHAPTER FOURTEEN: EVIDENCE OF PREVIOUS CONSULTATIONS CONDUCTED DURING ESIA FOR THE AIH AND ATC SITES .....	137
14.1 Introduction.....	137
14.3 Key Themes and Issues Raised.....	139
14.4 Site-Specific Evidence of Consultations.....	140
14.4.2 Chikun LGA (Agro-Industrial Hub – Daki-Takwas / Sabon Birnin Kasarami / Gonin Gora).....	142



14.5 Mechanisms for Dissent and Conflict Resolution .....	144
14.6 Lessons Learned from ESIA Consultations .....	145
CHAPTER FIFTEEN: CONCLUSION .....	147
Annexes.....	148
11.1 References.....	148



## LIST OF TABLES

Table 3.1: Summary of Biophysical and Socio-Economic Environment and Implications for SAPZ Implementation.	22
Table 5.1: Categorization of Stakeholders for SAPZ Project in Kaduna State	37
Table 5.2: Quadrants of the Matrix	39
Table 5.3: Stakeholder Influence–Interest Matrix for SAPZ Project, Kaduna State	42
Table 6.1: Inclusive and Gender-Sensitive Stakeholder Engagement Approach for SAPZ	50
Table 6.2: Definition of FPIC Components	52
Table 6.3: Operationalization of FPIC in the SAPZ Context	53
Table 6.4: Alignment with Legal and Institutional Frameworks	54
Table 6.5: Engagement Strategies for Vulnerable Groups	58
Table 7.1: Implementation Guidelines	62
Table 7.2: Public Consultations and Town Hall Meetings – Strategy and Institutional Alignment	63
Table 7.3: Target Groups for FGDs:	67
Table 7.5: Institutional Alignment	70
Table 7.6: Summary of KII Process for SAPZ Project	72
Table 7.7: Key PRA Tools and Their Application in the SAPZ Project:	73
Table 7.8: Sample Output: Community Map from Kuzuntu -Dutsen-Wai and Taki Dakwas	75
Table 8.1: Stakeholder Engagement Schedule	82
Table 8.2: Engagement Frequency by Project Phase	85
Table 9.1: Communication Channels	91
Table 9.2: Languages for Communication	93
Table 9.3: Accessibility and Cultural Appropriateness Strategy by Project Phase and Institutional Alignment	97
Table 10.1: GRM Tiers and Roles	104
Table 10.2: Submission of grievances	105
Table 10.3. Integration into Project Phases	109



Table 11.1: PIU Organizational Linkages in Stakeholder Engagement	113
Table 11.2: CLOs' Role Across Project Phases	116
Table 11.3: Institutional Roles and Responsibilities Matrix – SAPZ Kaduna	118
Table 11.4: Local Authorities & NGOs Roles Matrix – SAPZ Project, Kaduna State	126
Table 12.1: Key Performance Indicator (KPI) Mapping for Stakeholder Engagement	131
Table 12.2: Core Elements of the Stakeholder Feedback Mechanism	135
Table 12.3: Roles and Responsibilities	136
Table 12.4: Examples of Adaptive Management Applications in SAPZ	138
Table 13.1: Stakeholder Engagement Budget for SAPZ Project (₦)	143
Table 13.2: Capacity Building Activity Plan	148
Table 14.1: Evidence of Consultation Events and Outcomes – Kubau LGA (ATC Site)	174
Table 14.2: Evidence of Consultation Events and Outcomes – Chikun LGA (AIH Site)	176



## LIST OF FIGURES

Figure 1: Map of Kaduna showing the project Locations	3
Figure 2: Pictures of PAPs for AIH in Daki-Takwas, Chikun LGA	13
Figure 3: Pictures of PAPs for AIH in Daki-Takwas, Chikun LGA	13
Figure 4: Pictures of PAPs for AIH in Daki-Takwas, Chikun LGA	14
Figure 5: Pictures of PAPs for AIH in Daki-Takwas, Chikun LGA	14
Figure 6: Map of ATC project site at Dutsenwai-Kuzuntu	19
Figure 7: Map of AIH at Daki Takwas communities	20



## **LIST OF ABBREVIATIONS**

**ABU**-Ahmadu Bello University

**AfDB** – African Development Bank

**CLO** – Community Liaison Officer

**CSR** – Corporate Social Responsibility

**ECM** – Environmental Compliance Monitoring

**EIA** – Environmental Impact Assessment

**E&S** – Environmental and Social

**ESIA** – Environmental and Social Impact Assessment

**ESMP** – Environmental and Social Management Plan

**FMA&FS**-Federal Ministry of Agriculture and Food Security

**FME<sub>nv</sub>** – Federal Ministry of Environment

**FPIC** – Free, Prior, and Informed Consultation

**GBV** – Gender-Based Violence

**GRM** – Grievance Redress Mechanism

**IFAD** – International Fund for Agricultural Development

**IFC** – International Finance Corporation

**IMM** – Internal Monitoring Mechanism

**ISS** – Integrated Safeguards System

**KADMA**-Kaduna State Ministry of Agriculture

**KASU**-Kaduna State University

**KEPA** – Kaduna State Environmental Protection Authority

**KPI** – Key Performance Indicator

**LGA** – Local Government Area

**NGN** – Nigerian Naira

**NGO** – Non-Governmental Organization

**NESREA** – National Environmental Standards and Regulations Enforcement Agency

**OS** – Operational Safeguard



**PAP** – Project-Affected Person

**PIU** – Project Implementation Unit

**PRA** – Participatory Rural Appraisal

**RAP** – Resettlement Action Plan

**SAPZ** – Special Agro-Industrial Processing Zone

**SECAP** – Social, Environmental, and Climate Assessment Procedures

**SEP** – Stakeholder Engagement Plan

**SPIU** – State Project Implementation Unit



## EXECUTIVE SUMMARY

### ES1. Project Context and Strategic Importance

The Kaduna State Special Agro-Industrial Processing Zones (SAPZ) Project is a flagship initiative of the Federal Government of Nigeria, financed by the African Development Bank (AfDB), the International Fund for Agricultural Development (IFAD), and other development partners. It is designed to accelerate agricultural transformation, promote inclusive growth, and stimulate sustainable rural industrialization.

The project focuses on two strategic sites:

- **Agro-Industrial Hub (AIH), Daki-Takwas, Chikun LGA (250 ha):** A large-scale facility dedicated to processing, storage, and value addition, leveraging proximity to the Abuja–Kaduna Expressway for enhanced market access.
- **Agricultural Transformation Centre (ATC), Kuzuntu–Dutsen-Wai, Kubau LGA (30 ha):** A center for aggregation, training, and primary processing, strategically located within an agriculturally rich corridor.

Both locations were selected for their high agricultural potential and alignment with Kaduna State’s Agricultural Development Policy. However, they are characterized by rural settlement patterns, dependence on subsistence farming, limited infrastructure, and customary land tenure, necessitating a structured, inclusive, and context-sensitive approach to stakeholder engagement.

The SAPZ project has four main components:

1. Enabling infrastructure development (roads, power, water, waste systems).
2. Agricultural productivity and value chain enhancement.
3. Institutional strengthening and private sector participation.
4. Programme management and coordination.

The overarching goal is to drive agribusiness competitiveness, strengthen food systems, and improve rural livelihoods through sustainable agro-industrial development. Given the project’s scope and potential environmental and social implications, it has been classified as a Category 1 project under the AfDB Integrated Safeguards System (ISS), requiring key safeguard instruments including the Environmental and Social Impact Assessment (ESIA), Resettlement Action Plan (RAP), Livelihood Restoration Plan (LRP), and this Stakeholder Engagement Plan (SEP).

### ES2. Purpose and Objectives of the Stakeholder Engagement Plan (SEP)

The SEP provides a comprehensive framework for transparent, inclusive, and continuous stakeholder engagement throughout the SAPZ project lifecycle. It ensures that stakeholder concerns



are systematically identified, addressed, and integrated into project decision-making to foster ownership, accountability, and social license to operate.

**Key objectives of the SEP are to:**

- Ensure transparency and inclusivity by providing equitable access to project information and participation opportunities.
- Mitigate risks and conflict through proactive engagement on land acquisition, compensation, and environmental issues.
- Strengthen project design and ownership by integrating feedback from affected persons and institutions.
- Build trust and social license through accountability, dialogue, and grievance resolution mechanisms.

By achieving these objectives, the SEP enhances the project’s legitimacy, mitigates potential disputes, and promotes sustainable social outcomes.

**ES3. Alignment with Regulatory and Safeguards Frameworks**

The SEP is aligned with both Nigerian legal frameworks and international safeguard standards to ensure full compliance and best practice in stakeholder engagement.

**National Frameworks:**

- Environmental Impact Assessment (EIA) Act, Cap E12 LFN 2004.
- Kaduna State Environmental Protection Authority (KEPA) Law and Guidelines.

**International Frameworks:**

- **AfDB Operational Safeguard 10 (OS10):** Stakeholder Engagement and Information Disclosure.
- **IFC Performance Standard 1 (PS1):** Assessment and Management of Environmental and Social Risks and Impacts.
- **IFAD SECAP (2021):** Promoting socially inclusive, gender-responsive, and climate-resilient project design.

This integrated framework ensures that stakeholder engagement meets both statutory and international development standards.

**ES4. Stakeholder Identification and Analysis**

Stakeholders were identified and categorized based on their level of influence, interest, and vulnerability. The success of the SAPZ project depends on the effective participation of all actors — from affected communities to regulatory and funding institutions.



**Primary stakeholders** include Project-Affected Persons (PAPs), smallholder farmers, women and youth associations, and vulnerable groups (such as the elderly, persons with disabilities, and women-headed households) in Kuzuntu (Kubau LGA) and Daki-Takwas (Chikun LGA).

**Secondary stakeholders** include government institutions such as the Federal Ministry of Agriculture and Food Security (FMAFS), National Project Coordinating Unit (NPCU), Kaduna State Ministry of Agriculture (KDMA), Federal Ministry of Environment (FMEnv), and Kaduna State Environmental Protection Authority (KEPA). The host LGAs facilitate local-level coordination and grievance management.

**Tertiary stakeholders** comprise the AfDB, IFAD, FAO, academia (e.g., ABU Zaria, KASU), NGOs/CSOs, and the media, which provide funding, technical guidance, advocacy, and communication support.

A **Stakeholder Influence–Interest Matrix** guides engagement to ensure high-influence actors such as FMAFS, NPCU, and KDMA are strategically involved, while ensuring smallholders and vulnerable groups are meaningfully included.

#### **ES5. Core Engagement Approach and Principles**

The engagement approach is guided by the following key principles:

- **Inclusivity and gender sensitivity** – Ensuring deliberate participation of women, youth, and persons with disabilities.
- **Free, Prior, and Informed Consultation (FPIC)** – Ensuring voluntary, transparent, and informed participation.
- **Cultural appropriateness** – Respecting traditional and religious norms.
- **Transparency and accountability** – Facilitated through open disclosure, feedback mechanisms, and an operational Grievance Redress Mechanism (GRM).

These principles ensure that stakeholder participation is fair, respectful, and responsive to local contexts.

#### **ES6. Priority Environmental and Social (E&S) Issues for Engagement**

Key E&S issues that require ongoing stakeholder engagement include:

- Land acquisition, compensation, and livelihood restoration.
- Labour and working conditions, including GBV/SEA/SH prevention.
- Natural resource and water management.
- Community health, safety, and security.
- Biodiversity and pollution control.
- Information disclosure and grievance handling.



These priority areas will guide consultation planning during pre-construction, construction, and operational phases.

### **ES7. Summary of Previous Engagements and Key Outcomes**

Between May and August 2025, stakeholder consultations were undertaken during the ESIA, RAP, and SEP preparation phases across the project's host communities. These included public meetings, FGDs, KIIs, and validation sessions with traditional leaders, women, youth, local government representatives, and vulnerable groups.

#### **Key outcomes from previous engagements include:**

- Strong community support for the SAPZ due to expected employment and infrastructure benefits.
- Concerns over land access, compensation timing, and livelihood impacts.
- Requests for livelihood restoration and inclusion of vulnerable farmers.
- Demand for inclusion of women and youth in training and value-chain employment.
- Emphasis on transparency, accountability, and effective grievance management.
- Commitment by FMAFS, KDMA, LGAs, and community leaders to maintain continuous engagement throughout implementation.

These outcomes informed the development of this SEP, shaping its communication approach, GRM design, and institutional collaboration framework.

### **ES8. Grievance Redress Mechanism (GRM)**

A multi-tier, inclusive, and confidential GRM has been established to receive and resolve complaints promptly and transparently:

1. **Tier 1 – Community Level:** Village Heads, CLOs, and community representatives.
2. **Tier 2 – Local Government Level:** LGA Grievance Committee.
3. **Tier 3 – State PIU Level:** Review of complex or unresolved grievances.
4. **Tier 4 – State Ministry of Agriculture:** Escalation of policy-related disputes.
5. **Tier 5 – External Recourse:** AfDB Independent Recourse Mechanism (IRM) or judicial review.

Dedicated mechanisms and trained focal points are in place to handle Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH), ensuring survivor-centered confidentiality and protection.

### **ES9. Institutional Roles and Responsibilities**



To ensure effective implementation, the SEP establishes a robust institutional coordination structure linking federal, state, and local levels:

- **Federal Ministry of Agriculture and Food Security (FMAFS):** Provides national policy direction, coordination with development partners, and technical support to NPCU and state PIUs.
- **National Project Coordinating Unit (NPCU):** Harmonizes safeguard instruments, provides quality assurance, supervises state-level implementation, and ensures compliance reporting to AfDB/IFAD.
- **Kaduna State Ministry of Agriculture (KDMA):** Hosts the State Project Implementation Unit (SPIU), coordinates field-level activities, oversees community engagement, and ensures integration of SEP into state programmes.
- **State Project Implementation Unit (SPIU):** Manages day-to-day operations, safeguards compliance, and direct liaison with communities.
- **Community Liaison Officers (CLOs):** Facilitate local communication, grievance intake, and continuous engagement.
- **Local Government Authorities (LGAs):** Support mobilization, local grievance resolution, and coordination with traditional institutions.
- **Traditional Leaders:** Provide cultural legitimacy, mediate conflicts, and support awareness campaigns.
- **NGOs/CSOs:** Conduct independent monitoring, advocacy, and inclusion of vulnerable groups.
- **Development Partners (AfDB/IFAD):** Provide oversight, safeguard supervision, and technical support.

## ES10. Budget and Resources

A dedicated budget has been allocated to ensure that the Stakeholder Engagement Plan (SEP) is fully resourced and effectively implemented throughout the project’s planning, construction, and operational phases. The budget covers all core engagement activities, including consultations, communication, capacity building, grievance redress, monitoring, and inclusion of vulnerable groups.

### Summary of SEP Budget

Activity / Component	Estimated Cost (₦)
Public consultations, FGDs, and town halls	60,000,000
Translation, communication materials, and local radio	9,000,000
Salaries and logistics for CLOs and engagement staff	3,600,000



Grievance Redress Mechanism (setup, training, and operations)	8,700,000
Capacity building, workshops, and gender/GBV training	175,600,000
Monitoring, evaluation, and reporting	10,400,000
Contingency (5%)	12,800,000
<b>Total Estimated SEP Budget</b>	<b>₦251,100,000</b>

This budget ensures that stakeholder engagement activities are continuous, inclusive, and culturally sensitive, while also strengthening institutional and community capacities.

The Project Implementation Unit (PIU) will oversee and manage disbursement in coordination with the Kaduna State Ministry of Agriculture, Local Government Authorities, and AfDB supervision missions, ensuring transparency, accountability, and adaptive management across all project phases.

### **ES11. Conclusion**

The Stakeholder Engagement Plan (SEP) is a cornerstone of the Kaduna SAPZ Project, central to achieving its sustainability and inclusivity objectives. It establishes a structured, transparent, and participatory framework for communication, consultation, and collaboration among all stakeholders—ensuring that project outcomes remain socially equitable, environmentally sustainable, and economically beneficial.

Through effective coordination among FMAFS, NPCU, KDMA, and the AfDB, the SEP strengthens accountability, fosters trust, mitigates social risks, and promotes adaptive management throughout the project cycle. With adequate resourcing, strong institutional support, and continuous learning, the SEP will ensure equitable participation, enhanced community ownership, and long-term agricultural transformation across Kaduna State.



## CHAPTER ONE- INTRODUCTION

### 1.0 Background

This report is a Stakeholder Engagement Plan (SEP) for the Kaduna State Special Agro-Industrial Processing Zones (SAPZs). The Special Agro-Industrial Processing Zones (SAPZs) is an initiative of the Federal Government of Nigeria (FGN) financed by the African Development Bank/International Fund for Agricultural Development/ Islamic Development Bank (AfDB)/IFAD/IsDB)

The SAPZ is a major investment program of the Federal Government of Nigeria (FGN), driven by the Federal Ministry of Agriculture and Food Security (FMAFS) in collaboration with the state governments, Development partners, relevant Federal Ministries, Departments and Agencies (MDAs) and private investors to develop agro-processing clusters in areas of high agricultural production across the country. It is a strategic move to rapidly develop modern agro-processing capacity to serve the vast and growing local market, create a sustainable market for farmers and reduce postharvest losses of local agricultural produce; thereby creating wealth for farmers, promoting import substitution and creating sustainable agriculture-related jobs for women and youths.

The SEP is a deliberate framework to foster and productive participation of the stakeholders in planning a project and the implementation and also monitoring phases of the project. The framework aims to ensure that the views, rights, interests and inputs of the interested party; specifically, those directly and indirectly affected by the Kaduna State SAPZ project. The SEP is aimed at effectively protecting the concerns of all stakeholders. The SEP provide a strategic framework and instrument for communication, consultation and feedback; with much emphasis on inclusiveness of gender-mainstreaming, transparency and responsiveness.

The SEP is to provide a structured and inclusive framework for meaningful engagement throughout the lifecycle of the SAPZ Project. It sets out a robust methodology and schedule of activities for consultation, documentation, and integration of stakeholder feedback into project decision-making, while clarifying roles, responsibilities, and resource requirements for participation. The SEP also establishes mechanisms for monitoring and evaluating the effectiveness of stakeholder interactions, ensuring alignment with the Kaduna State Government and AfDB's vision for the SAPZ Program, as well as compliance with FMEnv environmental and social safeguard regulations.

In doing so, it seeks to contribute to national priorities of poverty reduction, zero hunger, inequality reduction, and sustainable economic diversification, while fostering job creation, climate resilience, and improved livelihoods. Furthermore, the SEP supports agricultural transformation through enhanced rural infrastructure, better access to markets, increased productivity, adoption of climate-smart technologies, and value addition in agro-processing. Importantly, it emphasizes inclusivity by promoting active participation and empowerment of smallholder



farmers, women, youth, persons with special needs, and other vulnerable groups across the agricultural value chain.

SAPZ Project has been classified as Category 1 under the Integrated Safeguards System (ISS) and the Environmental and Social Assessment Procedures (ESAP) of the AfDB, EIA Act Cap. E12 LFN, 2004 and Kaduna State Environmental Protection Authority Law. The category is on the basis of the large-scale, multisector and sensitive nature of the project. The environmental and social safeguards (ESS) concerns are to be addressed through the use of this strategy as a national instrument (including the ESIA, LRP/RAP, SEP and PMP). This ensures alignment with FMEnv regulations for environmental and social safeguards.

More so, SEP is considered as a significant and pivotal requirement by the Federal Government of Nigeria and the African Development Bank (AfDB) that stakeholders must be engaged effectively are carried out at the identification, preparation and implementation stages in a continuous way throughout the life of the project with a view to identify the possible environmental and social issues to engage on and to formulate mitigation measures.

Thus, it is in line with this background that the SEP was carried out in connection with the SAPZ project operation at or the Agricultural Transformation Centre, Dutsenwai, Kuzuntu, Kubau LGA and the Agro-Industrial Hub (AIHs Km26, Abuja-Kaduna-Zaria Expressway, Chikun LGA, Kaduna State, Nigeria.

### **Project Location**

The Kaduna State Special Agro-Industrial Processing Zone (SAPZ) Project will be implemented across two major sites: the Agro-Industrial Hub (AIH) at Daki Takwas in Chikun LGA and the Agricultural Transformation Center (ATC) at Kuzuntu–Dutsen-Wai in Kubau LGA (Fig. 1). Both sites require detailed Environmental and Social Impact Assessment (ESIA), Livelihood Restoration Plan (LRP), and Stakeholder Engagement Plan (SEP) to ensure sustainability, inclusivity, and compliance with AfDB and FMEnv requirements.

### **Agro-Industrial Hub (AIH), Daki Takwas, Chikun LGA**

The AIH will be developed on a land area of approximately 250 hectares, located at Km 26 along the Abuja–Kaduna Expressway. The project site is situated within Chikun Local Government Area and is easily accessible due to its proximity to a major transport corridor, which provides linkages to markets within Kaduna and neighbouring states. The host community is Daki Takwas, with adjoining settlements expected to benefit from improved rural infrastructure, employment, and market opportunities. Current land ownership is primarily under customary and communal arrangements, with the land presently used for a mix of smallholder farming, grazing, and limited residential activities. The environmental and social components around the site include farmlands, patches of secondary vegetation, seasonal streams, and scattered homesteads. Nearby facilities include small local markets, schools, and healthcare centers within Daki Takwas and surrounding settlements. The establishment of the AIH is expected to stimulate agro-processing activities, expand market access, and enhance economic opportunities along the agricultural value chain.



### **Agricultural Transformation Centre (ATC), Kuzuntu–Dutsen-Wai, Kubau LGA**

The ATC will occupy approximately 30 hectares of land located at Kuzuntu–Dutsen-Wai in Kubau Local Government Area. The site is strategically positioned to serve as a primary aggregation and transformation point for agricultural produce from surrounding farming communities. The host community is Kuzuntu, with adjoining settlements in Dutsen-Wai, Jenau, Anchau and other nearby villages. Current land use is predominantly subsistence farming and grazing, with land tenure largely governed by traditional authorities. The physical environment around the site includes cultivated fields, low-lying grasslands, and seasonal watercourses that support local livelihoods. Socially, the area is characterized by agrarian households with high dependence on agriculture for income and food security. Basic community facilities such as schools, places of worship, and rural access roads exist within the vicinity. The development of the ATC will strengthen smallholder farmers’ linkages to markets, promote value addition, and create direct and indirect employment opportunities for women, youth, and vulnerable groups in Kubau LGA.

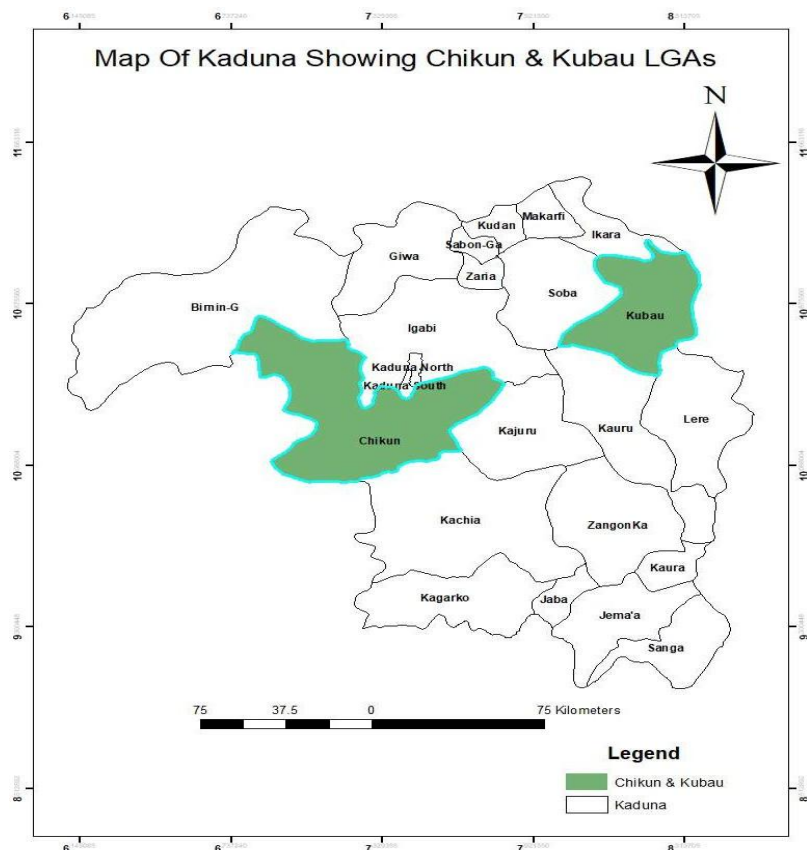


Figure 1: Map of Kaduna showing the project Locations



## 1.1 Purpose of the Stakeholder Engagement Plan (SEP)

The SEP is a strategic document developed to guide meaningful, inclusive, and continuous engagement with all relevant stakeholders throughout the lifecycle of the SAPZ Project in Kaduna State. The SEP aims to ensure that affected persons, vulnerable groups, host communities, local authorities, civil society organizations, traditional leaders, women, youth, and other interested parties are adequately informed, consulted, and empowered to participate in decisions that may affect them.

This plan sets out a clear framework for:

- Identifying and analyzing stakeholders.
- Designing and implementing inclusive engagement strategies.
- Disclosing project information in accessible formats.
- Establishing mechanisms for dialogue, feedback, grievance redress, and conflict resolution.
- Building long-term relationships and trust between the project proponents and stakeholders.
- Ensuring transparency, accountability, and social acceptability of the SAPZ investments.

By fostering continuous and culturally appropriate engagement, the SEP contributes to the overall environmental and social sustainability of the SAPZ Project and supports effective risk mitigation, social inclusion, and local ownership of project benefits.

## 1.2 Project Overview

The SAPZ Project in Kaduna State is a flagship initiative of the Federal Government of Nigeria, supported by the AfDB and other development partners. The objective is to boost agricultural productivity, agro-industrial transformation, rural development, and economic diversification by creating world-class agro-industrial hubs.

The Kaduna SAPZ project consists of two key components:

- **The Agricultural Transformation Center (ATC)** located in **Kuzuntu-Dutsen Wai**, Kubau LGA.
- **The Agro-Industrial Hub (AIH)** situated in **Daki-Takwas**, Chikun LGA.

These zones are designed to facilitate:

- Efficient agricultural value chain development.
- Access to modern agro-processing facilities.
- Market linkages for farmers and agribusinesses.



- Employment generation for local communities.
- Sustainable rural infrastructure development.

The project includes various sub components such as infrastructure development, water supply, electricity provision, waste and effluent management systems, social amenities, and training centres. As a multi-stakeholder initiative involving government agencies, private sector actors, and local communities, robust stakeholder engagement is essential for its success.

SAPZs are agro-based spatial development initiatives designed to concentrate agro-processing activities within areas of high production, processing and marketing of selected commodities. Essential elements of SAPZs include the Agro-Industrial Hubs (AIHs), Agricultural Transformation Centers (ATCs), Aggregation Centers (ACs) and agricultural production areas.

Table 1.1: SAPZ Kaduna State Project Components

Component	Financing (USD)	Focus Areas	Key Activities / Outputs
<b>1. Climate-Resilient Enabling Infrastructure &amp; Zone Management</b>	144.97M	Infrastructure development for AIH at Daki Takwas (250 ha) and broader SAPZ	<ul style="list-style-type: none"> <li>* Construction of roads, power, water, drainage, fencing, sewage &amp; safety facilities.</li> <li>* Development of offices, training centres, business hubs, labs, and quarantine units.</li> <li>* SEP &amp; ESMP implementation.</li> <li>* Advisory/oversight by NSIA, KDSG &amp; AfDB.</li> </ul>
<b>2. Agricultural Productivity &amp; Production</b>	46.07M	Boosting raw material supply, farm-level productivity & ATCs (e.g., Dutsen-Wai, Kubau LGA)	<ul style="list-style-type: none"> <li>* Establishment of ATCs &amp; Aggregation Centers.</li> <li>* Land rehab, irrigation, feeder roads, ICT platforms.</li> <li>* Inputs: improved seeds, fertilizer, mechanization, digital subsidy (e-wallet).</li> <li>* Training on climate-smart practices &amp; food safety.</li> <li>* Farmer advisory services, R&amp;D linkages, productivity compact.</li> </ul>



Component	Financing (USD)	Focus Areas	Key Activities / Outputs
			<ul style="list-style-type: none"> <li>* Youth/women/MSME empowerment through finance &amp; entrepreneurship support.</li> </ul>
<b>3. Policy &amp; Institutional Development</b>	6.75M	Strengthening enabling environment for SAPZ	<ul style="list-style-type: none"> <li>* Review/reform of agricultural policies, laws, regulatory frameworks.</li> <li>* Establish one-stop shop &amp; digital platforms for investor services.</li> <li>* Marketing &amp; investment promotion for AIH/ATC.</li> <li>* Capacity building for institutions, SOPs, IT-enabled systems.</li> <li>* Market sounding to attract private sector.</li> </ul>
<b>4. Program Coordination &amp; Management</b>	12.22M	Effective governance & oversight of SAPZ	<ul style="list-style-type: none"> <li>* Establish Special Delivery Team (FMAFS) and State/FCT Implementation Units.</li> <li>* Training of program officers.</li> <li>* Technical/financial audits.</li> <li>* Support for future SAPZ phases.</li> </ul>

## 1.2 Alignment with International and National Safeguards

The SEP for the Kaduna SAPZ Project is fully aligned with both international and national environmental and social safeguard standards. These standards provide the guiding principles and operational procedures to ensure stakeholder engagement is rights-based, transparent, participatory, and inclusive.

### International Alignment:

- **AfDB Operational Safeguard 10 (OS10):** The SEP complies with the AfDB's Integrated Safeguards System, particularly OS10 on Stakeholder Engagement and Disclosure. It ensures proactive engagement with stakeholders throughout the project cycle, with emphasis on vulnerable and marginalized groups.



- **IFC Performance Standard 1 (PS1):** The SEP adheres to IFC’s requirement for effective stakeholder engagement as a key element of environmental and social sustainability, including Free, Prior, and Informed Consultation (FPIC) where required.

#### **National Compliance:**

- **Federal Ministry of Environment (FMEnv):** The SEP is consistent with Nigerian environmental regulations and the EIA Act Cap. E12 LFN, 2004 which mandates public consultation and disclosure during project development.
- **Kaduna State Environmental Protection Authority (KEPA):** The SEP also complies with state-level engagement protocols, integrating local governance structures and traditional institutions in consultation processes.

### **1.3 Objectives of the Stakeholder Engagement Plan**

The Stakeholder Engagement Plan (SEP) for the Special Agro-Industrial Processing Zone (SAPZ) project in Kaduna State is prepared to foster meaningful, inclusive, and culturally appropriate continuous engagement with all project-affected parties and interested stakeholders throughout the lifecycle of the project. The key objectives of the SEP are as follows:

#### **1. Transparency and Inclusivity**

A core objective of the SEP is to promote transparency and inclusivity in all project-related communications and decision-making processes. This involves:

- Ensuring that accurate, timely, and culturally appropriate information is shared with stakeholders, particularly local communities and vulnerable groups.
- Facilitating access to information and opportunities to provide feedback regardless of gender, age, literacy level, or socio-economic status.
- Providing diverse and accessible platforms (e.g., community meetings, focus groups, grievance mechanisms, radio announcements in Hausa) for stakeholders to voice concerns, provide inputs, and participate in dialogue.

#### **2. Risk Reduction and Conflict Mitigation**

Effective stakeholder engagement is crucial for identifying potential risks early and addressing them proactively. Through ongoing consultation and information sharing, the SEP aims to:

- Minimize misunderstandings, grievances, and potential conflicts by creating an atmosphere of mutual trust and accountability between the project implementers and the stakeholders.
- Support early identification of concerns related to land use, resettlement, environmental impacts, and livelihood disruptions—allowing for timely mitigation measures.



- Reinforce the legitimacy of the project by demonstrating respect for local customs, community leadership structures, and traditional conflict resolution mechanisms.

### **3. Enhanced Project Design and Ownership**

Stakeholder inputs are critical to ensuring that the project is responsive to the actual needs and priorities of the target communities. Therefore, the SEP is also geared towards:

- Strengthening the relevance, sustainability, and social acceptance of project interventions by integrating community feedback into project design, implementation, and monitoring.
- Promoting a sense of ownership among beneficiaries and stakeholders, thereby increasing the likelihood of long-term success and local support for the infrastructure, services, and business opportunities provided by the SAPZ.
- Facilitating partnerships with local authorities, community-based organizations (CBOs), traditional leaders, women's groups, youth associations, and private sector actors to co-create solutions and enhance the socio-economic impact of the project.

By fulfilling these objectives, the SEP serves as a strategic tool to promote inclusive development, strengthen governance, and ensure that the SAPZ project delivers equitable benefits across all participating Local Government Areas (LGAs) in Kaduna State.

#### **1.4 Justification for the SEP**

The justification for developing the Stakeholder Engagement Plan (SEP) framework and producing a standard report for the SAPZ Project is grounded in the recognition that large-scale agro-industrial and infrastructure developments can generate significant environmental and social risks if not proactively managed. Given the project's broad scope, diverse locations, and multi-sectoral activities, it is critical to establish a participatory process where stakeholders jointly identify, evaluate, and mitigate potential impacts. These concerns include land acquisition and resettlement issues, which may affect land tenure security and livelihoods; ecosystem services disruption, such as loss of biodiversity, soil fertility, and water resources; and forest degradation resulting from land clearing and expansion. Other potential impacts include increased traffic and road safety risks, the influx of migrant workers leading to pressure on local infrastructure and services, and heightened risks of Sexual Exploitation, Abuse and Harassment (SEAH) as well as labour rights and ethical compliance challenges across the value chain. A well-structured SEP ensures that such risks are addressed transparently, with the meaningful participation of affected persons and vulnerable groups, while fostering trust, accountability, and alignment with AfDB, FMEnv, and Kaduna State safeguard requirements. By doing so, the SEP becomes a proactive tool for minimizing adverse effects, enhancing positive project outcomes, and ensuring that the SAPZ initiative delivers inclusive and sustainable development benefits.



The SEP is critical to ensuring that development proceeds in a responsible and sustainable manner, aligning with both national regulatory requirements and international safeguards, especially those of the AfDB, which classifies the project as Category 1 due to its potential impact magnitude.

The SEP report is necessary to address various risks, including land acquisition, involuntary resettlement, disturbances to ecological systems, and social disruption. It provides a systematic process for understanding these impacts early in the project cycle, enabling the formulation of targeted mitigation measures to minimize harm. Similarly, the SEP provide for environmental stewardship and social accountability by involving stakeholders and affected communities, thereby promoting transparency, inclusive decision-making, and community support for the project.

Furthermore, the SEP serves as a strategic tool to support sustainable development objectives—such as poverty reduction, food security, rural employment, and improving value chains in agriculture—by ensuring that environmental and social considerations are integrated into project planning and implementation. Finally, the SEP is justified on the grounds that it is indispensable for safeguarding environmental integrity, protecting community interests, and ensuring that the economic benefits of the project are achieved sustainably and responsibly.

### **1.5 Implementation Phases that Requires Stakeholders Engagement Plan**

The SAPZ Project for Kaduna State is a large and important project that is expected to proceed in stages. At every stage, the implementation of the SAPZ project must require SEP framework and the implementation is expected to be in the following stages:

- **Pre-construction phase:** Land preparation, community engagement, compensation/resettlement, E&S planning
- **Construction phase:** Civil works, infrastructure installation, utility and access development
- **Operational phase:** Training, input distribution, aggregation, processing, marketing
- **Decommissioning (if applicable):** Rehabilitation or repurposing of project sites.



## CHAPTER TWO: RISKS AND INDUCED IMPACTS OF THE SAPZ PROJECT THAT NECESSITATE STAKEHOLDERS' ENGAGEMENT PLAN (SEP)

### 2.1 Introduction

In any project, there is the need to put in place wide stakeholders' engagement framework and physical engagement process from the beginning to the end of the project lifecycle which is from identification to completion stage. Similarly, the Kaduna State SAPZ project requires a SEP framework to minimize the perceived negative effects that the project will come with. Therefore, infrastructures and associated facilities under Component 1 will require land acquisition and conversion of existing farmland, resulting in:

### 2.2 Physical Displacement: Nature, Risk, and Implications

The justification for developing the Stakeholder Engagement Plan (SEP) framework and preparing a standard report for the SAPZ Project in Kaduna State arises from the recognition that large-scale agro-industrial and infrastructure interventions, such as the Agro-Industrial Hub (AIH) at Daki Takwas and the Agricultural Transformation Center (ATC) at Kuzuntu–Dutsen-Wai, present significant environmental and social risks if not proactively managed through inclusive dialogue and transparent engagement.

**1. Land Acquisition and Displacement:** Although the risk of large-scale physical displacement under the SAPZ project is considered minimal, it remains a critical safeguard concern that requires systematic assessment under the SEP. Physical displacement may occur due to land acquisition, leading to the loss of shelter, community-owned assets, or social amenities. In the case of the ATC, grievances of the host community are significant and must be addressed through structured consultation, grievance redress mechanisms, and livelihood restoration measures. Furthermore, the SEP will assess risks of economic displacement, particularly for smallholder farmers, herders, and resource users whose livelihoods depend on the project land.

**2. Labour and Ethical Standards:** The establishment of agro-industrial facilities and supporting infrastructure is expected to create employment opportunities. However, risks related to labour rights violations, unsafe working conditions, child labour, and unfair recruitment practices remain concerns. The SEP will ensure that engagement processes highlight these risks, promote adherence to international labour standards, and strengthen oversight mechanisms to guarantee ethical and equitable treatment of workers.

**3. Influx of Migrant Workers:** The AIH and ATC developments are likely to attract a substantial influx of migrant workers, leading to increased pressure on local infrastructure, housing, water supply, sanitation, and social services. This influx can also create competition for local jobs, increase living costs, and strain community relations. The SEP will provide a platform for communities and authorities to voice concerns, anticipate impacts, and design inclusive strategies for managing these demographic changes.

**4. Biodiversity and Ecosystem Services:** The conversion of agricultural and forested lands for industrial purposes carries risks of biodiversity loss, forest degradation, and disruption of



ecosystem services such as soil fertility, water regulation, and carbon sequestration. The SEP will facilitate discussions on trade-offs between development and conservation, ensure affected stakeholders are consulted on resource use, and guide the design of mitigation measures to protect natural assets critical for livelihoods and climate resilience.

**5. Social Risks (SEAH and Community Safety):** The influx of workers and expansion of industrial activities also heightens risks of Sexual Exploitation, Abuse and Harassment (SEAH), particularly affecting women, girls, and vulnerable groups. Community safety concerns, including road traffic accidents due to increased vehicular movement, are also anticipated. The SEP will strengthen awareness, prevention, and reporting mechanisms for SEAH, while ensuring traffic management and occupational safety standards are integrated into project planning.

In summary, the significance of grievances already expressed by the ATC community, combined with the potential risks of land acquisition, physical and economic displacement, labour concerns, worker influx, biodiversity loss, and social vulnerabilities, underscores the necessity of a comprehensive SEP. By systematically addressing these issues, the SEP will ensure that the SAPZ Project is implemented in a transparent, socially inclusive, and environmentally responsible manner, while fostering trust between project proponents and affected stakeholders.

### 2.3 Economic Displacement

The development of the 30ha Agricultural Transformation Center (ATC) at Dutsen-Wai-Kuzuntu and the 250ha Agro-Industrial Hub (AIH) at Daki-Takwas will require the conversion of large parcels of land 30 hectares and 250 hectares respectively which are currently used for active farming by smallholder farmers under customary tenure. Though the land is legally owned by the Kaduna State Government, community members have engaged in generational agricultural activities on these lands and rely on them as their primary source of income, food security, and cultural identity.

This land acquisition will result in economic displacement, defined as the loss of access to productive assets or income-generating opportunities, even when physical relocation does not occur. The majority of affected persons are likely to be:

- Rain-fed farmers cultivating crops such as maize, soybeans, tomatoes, and ginger
- Sharecroppers and tenants without formal land titles
- Women and youth engaged in small-scale food production or marketing
- Livestock owners whose grazing areas will be reduced

The disruption of these livelihood activities could:

- Lead to reduced household income and increased poverty vulnerability
- Disproportionately affect vulnerable groups with limited coping mechanisms



- Trigger localized conflicts over residual land access and compensation entitlements

As such, the Livelihood Restoration Plan (LRP) and Resettlement Action Plan (RAP) will prioritize:

- A complete socioeconomic survey and livelihood profiling of affected persons
- Provision of cash or in-kind compensation, land replacement where feasible, or agricultural input support
- Access to alternative livelihoods such as agribusiness training, off-farm employment in ATC/AIH operations, or enterprise support
- Special consideration for vulnerable groups including women, youth, and elderly-headed households and persons with disabilities to prevent exclusion

### **1. Loss of Access to Common Resources**

Beyond private farmland, the project may also cause the restriction or permanent loss of access to communal resources, especially in surrounding villages that depend on shared spaces for:

- Grazing livestock during dry or post-harvest seasons
- Collecting firewood and medicinal plants fallow areas
- Community footpaths and link roads used for accessing markets, farms, or schools
- Water collection points, such as seasonal streams or hand-dug wells

These communal or informal-use lands—though not formally titled—are vital to the subsistence economy and social fabric of local populations. Their loss could:

- Undermine food systems and reduce livestock productivity
- Increase time burdens on women and children who must travel farther for water or fuel
- Spark intra-community disputes over the redrawing of land-use boundaries

Mitigation strategies will include:

- Mapping and documenting communal use patterns through Participatory Rural Appraisal (PRA)
- Designing the project to avoid sensitive communal zones where possible
- Providing community infrastructure upgrades (e.g., new access paths, shared water points, livestock corridors)
- Including affected groups in the design of land-use realignment and compensation schemes

### **2. Increased Competition for Water Resources and Degradation of Natural Habitats**



The establishment of the Agro-Industrial Hub (AIH) at Daki-Takwas (250 ha) and the Agricultural Transformation Center (ATC) at Dutsen-Wai–Kuzuntu (30 ha) will require significant water inputs. Based on preliminary scoping, operational water demand is expected to be in the range of 200–400 m<sup>3</sup>/day at the AIH (due to processing of perishable crops such as tomatoes, maize, and soybeans) and 50–100 m<sup>3</sup>/day at the ATC (mainly for training plots, irrigation, and domestic sanitation).

**Project-specific sources of water demand include:**

- **Processing agricultural commodities:** washing and cleaning operations in the AIH facilities.
- **Demonstration farms and training plots:** irrigation requirements within the ATC and AIH cluster.
- **Sanitation and domestic use:** by approximately 200–300 workers and daily visitors at the AIH, and 50–100 at the ATC.
- **Outgrower and extension support:** additional water abstraction linked to value-chain farmers in surrounding communities.

Baseline condition: Communities around Daki-Takwas currently rely on boreholes, seasonal streams, and hand-dug wells for domestic and livestock water supply. In Dutsen-Wai–Kuzuntu, groundwater is the dominant source for smallholder farmers and household use. Stakeholder consultations already flagged concerns about dry-season scarcity and the risk of borehole depletion if project demand competes directly with community sources.

**Potential adverse impacts linked to project activities include:**

- **Aquifer depletion:** Excessive groundwater abstraction for AIH processing and irrigation could reduce recharge rates, lowering yields from community boreholes and hand-dug wells, especially in the dry season.
- **Reduced water availability:** Competing demand may limit water for downstream users, including herders and irrigation farmers.
- **Resource-use conflicts:** Grievances may arise between project operators and communities, particularly during drought periods.
- **Habitat degradation:** Land clearing and infrastructure development for the ATC and AIH, coupled with water abstraction, may disrupt seasonal wetlands, riparian vegetation, and farm-adjacent bushland that serve as habitats for pollinators, fish, and small wildlife.
- **Flood risk and recharge impacts:** Removal of natural vegetation buffers could impair flood control and groundwater recharge, increase erosion and reduce long-term resilience.



Stakeholder feedback: Farmers and herders in both LGAs emphasized concerns over losing access to seasonal water points, while women expressed fears over increased burden of fetching water from more distant sources if community wells run dry.

**Mitigation measures (ESIA/ESMP commitments):**

- Conduct a Water Resource Assessment (WRA) and hydrological studies before construction to determine sustainable abstraction levels.
- Design dedicated boreholes for project facilities (separate from community wells) with regulated abstraction limits.
- Adopt water-efficient technologies, such as drip irrigation and reuse/recycling of processing water.
- Establish buffer zones and greenbelts along seasonal streams and wetlands within the project footprint.
- Implement biodiversity offsets and restoration plans for any degraded habitats.
- Carry out continuous water quality and yield monitoring, with data shared publicly with stakeholders.
- Strengthen the grievance redress mechanism to handle complaints related to water scarcity or ecosystem impacts.

By grounding the assessment in quantitative estimates, baseline water use patterns, and feedback from local communities, this section ensures that water competition and ecological impacts are addressed systematically in line with the mitigation hierarchy (avoid, minimize, mitigate, offset) and AfDB’s ISS 2023 (OS5 and OS3) requirements.

**2.4 Sources of Potential Physical and Economic Displacement**

While the SAPZ project in Kaduna State is not expected to trigger large-scale physical displacement, certain activities at both the Agro-Industrial Hub (AIH) in Daki Takwas (250 hectares) and the Agricultural Transformation Center (ATC) in Kuzuntu–Dutsen-Wai (30 hectares) may give rise to localized displacement risks. These risks require careful stakeholder engagement, early identification of affected persons, and transparent livelihood restoration measures.

**1. Agro-Industrial Hub (AIH), Daki Takwas – 250 ha**

The larger scale of the AIH site and its location along the Abuja–Kaduna Expressway presents a higher potential for physical displacement compared to the ATC. Key sources include:

- **Land clearing and site preparation** for industrial infrastructure, which may extend into areas currently used for seasonal shelters, farmsteads, and dwellings situated on farmland fringes.



- **Construction of access and internal roads**, which may cut across footpaths requiring changes and discomfort.
  - **Placement of core facilities** such as storage units, input distribution centers, boreholes, or waste management zones, which could affect land within or near communal gathering spaces.
  - **Buffer zones and safety setbacks** for utilities (e.g., solar arrays or drainage channels) may require clearing areas where temporary settlements or shelters are informally located.
  - **Seasonal farm shelters**, used during planting and harvest cycles, are particularly vulnerable at the AIH site given the intensity of agricultural activity and land pressure in the area.
- 2. Agricultural Transformation Center (ATC), Kuzuntu–Dutsen-Wai – 30 ha**
- Although smaller in scale, the ATC site may still result in targeted physical displacement due to its proximity to community farmlands and settlements. Potential sources include:
- **Clearing of the 30-hectare site**, which may affect scattered residential structures or farmsteads located at the periphery of the designated land.
  - **Construction of supporting infrastructure** such as feeder roads, training centers, or input distribution facilities, which may encroach on communal spaces or footpaths.
  - **Utility corridors and safety zones**, though smaller than at the AIH, may overlap with shelters or temporary residences situated near agricultural fields.
  - **Community grievances** at the ATC site underscore the significance of even small-scale displacement, making early consultation and livelihood restoration critical to avoid escalation of conflict.

In both project locations, seasonal shelters, peripheral dwellings, and community-use areas represent the primary sources of displacement risk. The SEP will therefore prioritize transparent disclosure, joint mapping of at-risk structures, and development of context-appropriate Livelihood Restoration Plans (LRPs) to minimize adverse impacts and ensure that all affected persons are consulted and adequately compensated.

#### **i. Categories of Affected Assets**

The types of physical assets at risk of displacement include:

- Mud-block homes, huts, and temporary housing
- Farm huts and shade structures
- Informal market stalls or kiosks near road alignments
- Public infrastructure such as wells, boreholes, or access tracks



Plate 2.1: Farmers cultivating their farmlands within the proposed AIH site in Daki-Takwas, Chikun LGA, illustrating areas of productive agricultural activity that will be impacted by economic displacement

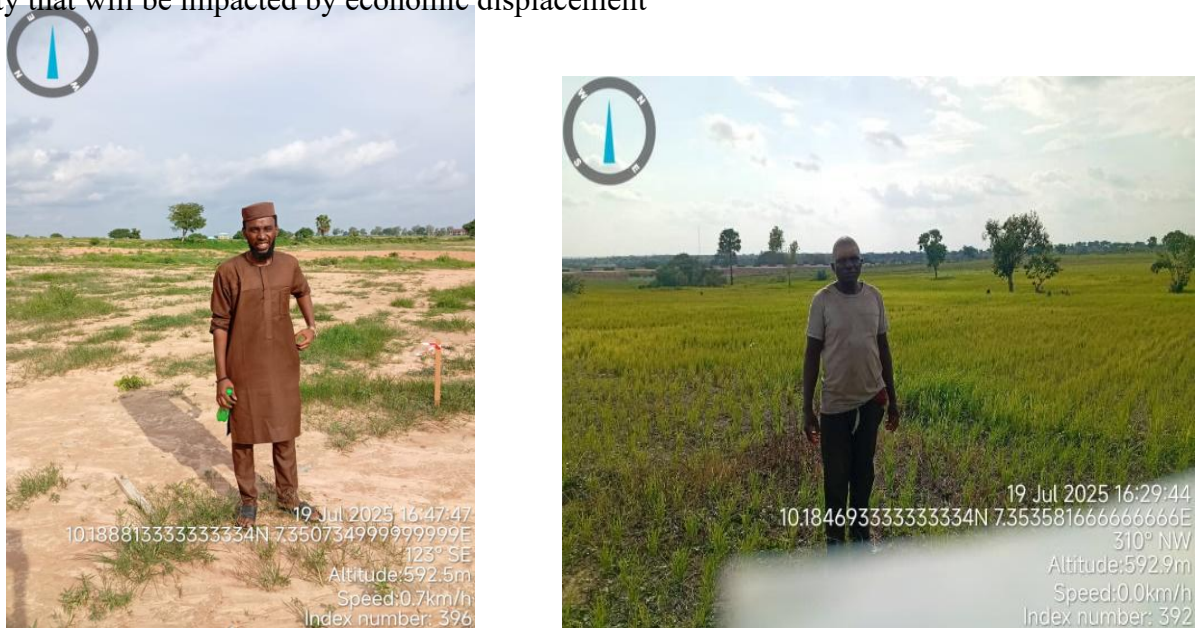


Plate 2.2: Cultivated farmlands belonging to PAPs at the proposed AIH site in Daki-Takwas, Chikun LGA, showing the extent of livelihood dependence on agriculture in the

## ii. Community Sensitivity and Land Tenure Dynamics

Although the land for both the ATC and AIH has been formally allocated by the Kaduna State Government and is government-owned, it is presently under cultivation and informal use by community members. In rural Nigerian contexts, land tenure is often governed by customary



systems, where community members may hold long-standing socio-cultural claims to land even in the absence of formal legal titles. Consequently, any clearing of land or restriction of access to such lands—even if officially state-owned—may be perceived as a form of displacement. This is particularly significant where households or vulnerable groups such as women, elders, and youth depend on these lands for seasonal residence, agricultural activities, or livelihood support. Such sensitivities necessitate careful alignment with the African Development Bank’s Integrated Safeguards System (ISS, 2023), specifically Operational Safeguard (OS) 5 on Land Acquisition, Restrictions on Access to Land and Land Use, and Involuntary Resettlement, which requires minimizing displacement and ensuring inclusive, fair, and timely mitigation measures.

#### iv. Approach to Assessment and Mitigation

To effectively manage these risks, the project will adopt a structured approach that includes:

- Conducting a comprehensive census and asset inventory at both the ATC (Dutsen-Wai–Kuzuntu) and AIH (Daki-Takwas) sites to establish:
  - Whether any physical structures fall within the project footprint.
  - The extent of relocation or reconstruction required for such structures.
  - The degree of reliance on affected structures (distinguishing between permanent and seasonal use).
- Preparing a Resettlement Action Plan (RAP) that will:
  - Identify and document all Project-Affected Persons (PAPs) or communities.
  - Provide full compensation at replacement cost for any lost structures, communal assets, or restricted land-use rights.
  - Include transitional assistance, livelihood restoration support, and relocation aid where needed.
  - Ensure meaningful community engagement, disclosure, and a functional grievance redress mechanism throughout the process.
- Aligning mitigation with the requirements of AfDB OS5 (ISS 2023), IFC Performance Standard 5, and Nigeria’s Land Use Act, all of which emphasize minimizing physical and economic displacement where possible, and guaranteeing adequate compensation and livelihood restoration where avoidance is not feasible.

#### v. Site-Specific Focus Areas

- **Dutsen-Wai–Kuzuntu (ATC site):** Preliminary scoping suggests a relatively low risk of physical displacement due to dispersed housing and significant undeveloped land within the site. Nonetheless, attention will be given to huts, temporary shelters, and



community footpaths that fall within the development footprint, ensuring that potential disruptions are fully addressed.

- **Daki-Takwas (AIH site):** While the AIH site covers a larger footprint, the risk of physical displacement due to residential settlement is minimal, as the majority of surrounding communities are located at a distance from the site. However, there remains a higher likelihood of economic displacement, particularly due to loss of cultivated farmland and seasonal farm shelters. These will be prioritized in the RAP process, with tailored compensation and livelihood restoration measures to safeguard affected households and vulnerable groups.



## CHAPTER THREE: THE PROJECT ENVIRONMENT

### 3.1 Overview of the Project Influence Area

The project that the Stakeholders Engagement Plan (SEP) framework was developed for the SAPZ aim at covering specifically the sites of the Agricultural Transformation Center (ATC) and Agro-Industrial Hub (AIH), their direct zones of influence (within a 1–3 km radius), the indirectly or more broadly affected areas (including larger parts of Kubau and Chikun LGAs as well as adjoining regions of Kaduna State). The ATC will be established at Dutsen-Wai-Kuzuntu, while the AIH will be situated at Daki-Takwas, both strategically positioned to take advantage of Kubau’s fertile agricultural land and Chikun’s access to the Kaduna-Abuja Expressway to facilitate market connectivity. The project environment will be shaped by and will, in turn, influence the activities of the SAPZ program, including infrastructure development, agricultural intensification, and agro-processing operations.

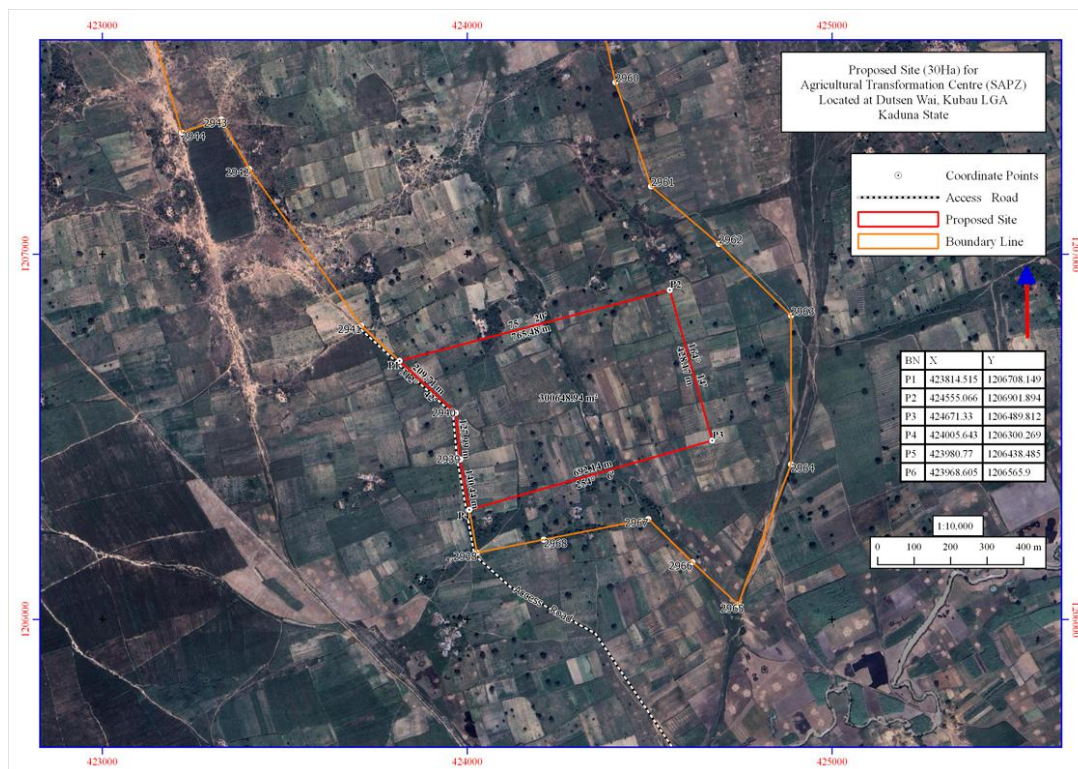
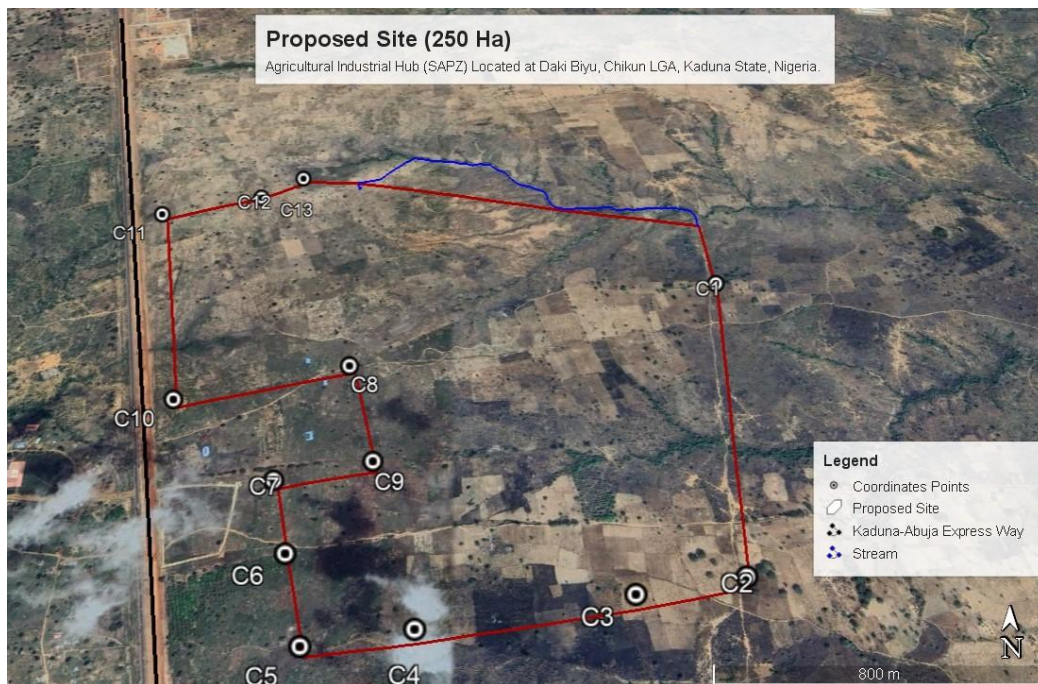


Figure 3.1: Map of ATC project site at Dutsen-wai-Kuzuntu



ID	Latitude	Longitude
C1	10°11'13.70"N	7°22'4.05"E
C2	10°10'37.33"N	7°21'59.91"E
C3	10°10'35.64"N	7°21'50.41"E
C4	10°10'32.42"N	7°21'32.24"E
C5	10°10'30.82"N	7°21'23.22"E
C6	10°10'39.05"N	7°21'21.22"E
C7	10°10'46.70"N	7°21'19.35"E
C8	10°11'0.65"N	7°21'25.25"E
C9	10°10'48.82"N	7°21'28.13"E
C10	10°10'56.64"N	7°21'8.48"E
C11	10°11'24.98"N	7°21'1.98"E
C12	10°11'27.87"N	7°21'13.12"E
C13	10°11'31.85"N	7°21'17.66"E

Figure 3.2: Map of AIH at Daki Takwas communities

### 3.2 Size of Project Area

The project site which this Stakeholders Engagement Plan (SEP) was written for comprises two primary locations within Kaduna State: one at Dutsen-Wai-Kuzuntu in Kubau LGA (30ha) and the other at Daki-Takwas in Chikun LGA (250ha), with a combined area of approximately 280 hectares. Specifically, the Agricultural Transformation Center (ATC) is planned to occupy 30 hectares at Dutsen-Wai-Kuzuntu a rural, agriculturally productive area known for the cultivation of crops such as maize, soybeans, ginger, and tomatoes. The Agro-Industrial Hub (AIH) will be established on a larger parcel of 250 hectares at Daki-Takwas, approximately 75 kilometers from Kaduna city, and adjacent to the Olam Farms corridor along the Abuja-Kaduna-Zaria Expressway.

Both sites are currently under active agricultural use by community members, although the lands are officially owned by the Kaduna State Government. Despite the statutory ownership,



local community members have long utilized these lands for farming, and they recognize government ownership. To ensure equitable transition and minimize adverse impacts, a census and inventory of Project-Affected Persons (PAPs) will be undertaken to inform the Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) in line with AfDB and FMEnv requirements.



### 3.3 Biophysical and Socio-Economic Environment and Implications for SAPZ Implementation

Table 3.1: Summary of Biophysical and Socio-Economic Environment and Implications for SAPZ Implementation.

Section	Subsection	Key Characteristics	Implications for SAPZ
<b>Biophysical Environment</b>	<b>Climate</b>	<ul style="list-style-type: none"> <li>Tropical savanna climate (wet: Apr–Oct, dry: Nov–Mar) - Rainfall: 1,000–1,500 mm/year, peak in Jul–Aug - Temperature: 20–35°C, peak in Mar–Apr</li> </ul>	<ul style="list-style-type: none"> <li>Erosion control needed during rainy season</li> <li>Efficient irrigation required during dry season</li> <li>Solar systems compatible with high solar radiation</li> </ul>
	<b>Topography &amp; Land Use</b>	<ul style="list-style-type: none"> <li><b>Kubau (ATC):</b> Undulating plains (600–700 m); farmland (maize, soybeans, ginger, tomatoes); some wetlands</li> <li><b>Chikun (AIH):</b> Flat/sloping terrain near expressway; agricultural, semi-urban land, some degraded zones</li> </ul>	<ul style="list-style-type: none"> <li>Fertile farmland displacement: triggers RAP/LRP</li> <li>Drainage and erosion risks require engineering controls (terracing, drainage)</li> </ul>
	<b>Soils</b>	<ul style="list-style-type: none"> <li><b>Kubau:</b> Loamy, high organic content, moderately acidic (pH 5.5–6.5)</li> <li><b>Chikun:</b> Loamy/sandy loam, vulnerable to compaction</li> </ul>	<ul style="list-style-type: none"> <li>Soil erosion/compaction risks during construction</li> <li>Need sustainable agro-practices to prevent degradation</li> </ul>
	<b>Water Resources</b>	<ul style="list-style-type: none"> <li><b>Kubau:</b> Seasonal streams, shallow aquifers; dry-season scarcity.</li> <li><b>Chikun:</b> Rivers and aquifers near settlements; flood-prone</li> </ul>	<ul style="list-style-type: none"> <li>Irrigation and processing could stress water supply</li> </ul>



Section	Subsection	Key Characteristics	Implications for SAPZ
			<ul style="list-style-type: none"> <li>• Processing wastewater requires treatment to avoid contamination</li> <li>• Water harvesting to supplement water shortages</li> </ul>
<b>Biodiversity</b>		<ul style="list-style-type: none"> <li>• <b>Kubau:</b> Agro-biodiversity; shea trees, grasses, pollinators</li> <li>• <b>Chikun:</b> Similar biodiversity, with habitat fragmentation risks from expressway proximity</li> </ul>	<ul style="list-style-type: none"> <li>• Land clearing may affect ecosystems and yields</li> <li>• Mitigation: biodiversity survey, buffer zones, native species planting</li> </ul>
<b>Socio-Economic Environment</b>	<b>Demographics</b>	<ul style="list-style-type: none"> <li>• <b>Kubau:</b> ~150,000 (rural); Hausa/Fulani majority</li> <li>• <b>Chikun:</b> ~370,000 (semi-urban); diverse ethnicities Gender disparities persist</li> </ul>	<ul style="list-style-type: none"> <li>• High farming dependence increases displacement risk</li> <li>• Women need inclusion in LRP/GBV response measures</li> </ul>
	<b>Livelihoods</b>	<ul style="list-style-type: none"> <li>• <b>Kubau:</b> Smallholder farming; livestock, petty trade</li> <li>• <b>Chikun:</b> Farming plus trade, services, transport Poverty: 60–70% in Kubau and 30-40% in Chikun</li> </ul>	<ul style="list-style-type: none"> <li>• Land acquisition may disrupt livelihoods</li> <li>• Job creation and training must be equitable to prevent worsening inequality</li> </ul>
	<b>Culture &amp; Social Context</b>	<ul style="list-style-type: none"> <li>• Patriarchal systems dominate</li> <li>• Traditional leaders key to land access –</li> <li>• GBV prevalence: 31% (NDHS 2018)</li> </ul>	<ul style="list-style-type: none"> <li>• Cultural sensitivity essential in RAP/LRP</li> <li>• Engage women and leaders in planning</li> </ul>



Section	Subsection	Key Characteristics	Implications for SAPZ
			<ul style="list-style-type: none"> <li>Integrate GBV prevention programs</li> </ul>
	<b>Infrastructure &amp; Services</b>	<ul style="list-style-type: none"> <li><b>Kubau:</b> Poor roads, minimal electricity, basic healthcare</li> <li><b>Chikun:</b> Better access due to urban proximity</li> </ul>	<ul style="list-style-type: none"> <li>SAPZ-associated infrastructure can improve access</li> <li>Risks: service pressure, displacement (needs RAP/LRP)</li> </ul>
<b>Associated Facilities</b>		<ul style="list-style-type: none"> <li>Roads</li> <li>solar systems</li> <li>water treatment</li> <li>waste management planned</li> </ul>	May impact ecosystems and land access - Opportunity to enhance services if equitably deployed
<b>Implications for SEP, ESIA, RAP, LRP</b>	<b>Environmental</b>	<ul style="list-style-type: none"> <li>Soil erosion,</li> <li>water contamination</li> <li>biodiversity loss</li> <li>agrochemical risks</li> </ul>	Erosion control, wastewater treatment, sustainable farming needed
	<b>Social</b>	<ul style="list-style-type: none"> <li>Displacement of farmers</li> <li>GBV risks</li> <li>livelihood disruption</li> </ul>	Inclusive RAP/LRP with training, compensation, GBV mitigation
	<b>Opportunities</b>	<ul style="list-style-type: none"> <li>Leverage agriculture for poverty reduction</li> <li>Job creation, improved infrastructure</li> <li>reduced gender gaps</li> </ul>	Design interventions that ensure equity and sustainability



## **CHAPTER FOUR: LEGAL AND REGULATORY FRAMEWORKS GUIDING THE STAKEHOLDER'S ENGAGEMENT PLAN**

Stakeholder engagement is a fundamental component of sustainable development practice and is underpinned by a robust legal and institutional framework at the national and international levels. This section outlines the key regulations, policies, and standards that guide stakeholder engagement for the Special Agro-Industrial Processing Zones (SAPZ) Project in Kaduna State. These frameworks not only ensure compliance with statutory requirements but also promote best practices in transparency, inclusivity, social accountability, and environmental sustainability.

The SAPZ initiative is being implemented within a multi-donor context involving the African Development Bank (AfDB), International Fund for Agricultural Development (IFAD), and other development partner. As such, the project must adhere to a range of environmental and social safeguard requirements that reflect both Nigerian legislation and international standards. Key among these are the Nigerian Environmental Impact Assessment (EIA) Act Cap E12 LFN, 2004 AfDB's Integrated Safeguards System (specifically Operational Safeguard 10 on Stakeholder Engagement), the International Finance Corporation (IFC) Performance Standards—particularly Performance Standard 1 on Assessment and Management of Environmental and Social Risks and Impacts—and the IFAD Social, Environmental and Climate Assessment Procedures (SECAP).

Collectively, these frameworks require the establishment of an inclusive, iterative, and culturally appropriate stakeholder engagement process throughout the project lifecycle. The regulatory standards outlined in this section serve as the foundation for the planning, implementation, monitoring, and evaluation of stakeholder engagement activities for the SAPZ project. This alignment reinforces the project's commitment to transparency, grievance resolution, local ownership, and sustainable development outcomes.

### **4.1 Nigerian Environmental Impact Assessment (EIA) Act cap E12 LFN, 2004**

The Environmental Impact Assessment (EIA) Act cap E12 LFN, 2004 serves as the cornerstone of environmental governance in Nigeria. It provides the legal and institutional framework for evaluating the environmental and social consequences of proposed development projects prior to their implementation. The Act is aimed at integrating environmental and social considerations into project planning and decision-making to promote sustainable development and safeguard the rights and well-being of affected communities.

The EIA Act mandates that all major projects—particularly those with significant potential to impact the environment or human populations, such as agro-industrial developments and infrastructure under the SAPZ program—must be subjected to an Environmental Impact Assessment. This assessment must be conducted early in the project planning cycle to ensure that potential adverse impacts are identified, predicted, evaluated, and mitigated appropriately.



One of the most critical provisions of the Act is the statutory requirement for public participation and stakeholder consultation throughout the EIA process. This includes engaging with affected persons, vulnerable groups, civil society organizations, and other relevant stakeholders to solicit their views, understand their concerns, and incorporate their feedback into the project's design and mitigation strategies.

Stakeholder consultation must take place at several key stages, including:

- **Screening and scoping:** to identify key issues and concerns.
- **Impact assessment:** to ensure that local knowledge and perspectives are integrated.
- **Public disclosure and review:** where project findings and mitigation plans are shared with stakeholders in an accessible format.

The Federal Ministry of Environment (FMEnv) is the primary authority responsible for overseeing the implementation of the EIA process at the national level. At the sub-national level, agencies such as the Kaduna State Environmental Protection Authority (KEPA) play a crucial role in ensuring state-level compliance, monitoring, and enforcement of EIA regulations.

For the SAPZ project in Kaduna, the EIA Act provides a mandatory legal foundation for stakeholder engagement. It ensures that community voices are not only heard but formally recognized in the environmental and social planning processes. The SEP aligns closely with this framework by ensuring that all stakeholder engagement activities are carried out in compliance with Nigerian law, thereby strengthening project legitimacy, transparency, and sustainability.

#### **4.2 African Development Bank (AfDB) Operational Safeguard 10: Stakeholder Engagement and Information Disclosure**

As a project funded by the African Development Bank (AfDB), the Special Agro-Industrial Processing Zone (SAPZ) initiative in Kaduna State is required to comply with the Bank's Integrated Safeguards System (ISS), which outlines comprehensive environmental and social standards. Of particular relevance to stakeholder relations is Operational Safeguard (OS) 10, titled "*Stakeholder Engagement and Information Disclosure.*" This safeguard sets out the mandatory procedures and expectations for engagement with project stakeholders throughout the project lifecycle.

Operational Safeguard 10 emphasizes the following key principles:

- **Early and Meaningful Engagement:** Stakeholder engagement must begin at the earliest possible stage of project planning and must continue throughout the implementation and monitoring phases. Engagement should be inclusive of all relevant stakeholders, especially marginalized and vulnerable groups likely to be affected by project activities.
- **Free, Prior, and Informed Consultation (FPIC):** All interactions with stakeholders must be conducted in a manner that is culturally appropriate and respectful of local



customs and values. Stakeholders must be provided with timely, relevant, and understandable information to make informed decisions, without coercion or manipulation.

- **Accessible and Responsive Grievance Redress Mechanism (GRM):** OS 10 requires that the project establish a robust grievance mechanism that is accessible, fair, and capable of resolving concerns efficiently. The GRM must be tailored to local contexts and clearly communicated to all stakeholders to ensure usability.
- **Transparent and Continuous Information Disclosure:** Information related to the project's environmental and social performance—such as Environmental and Social Impact Assessments (ESIAs), Resettlement Action Plans (RAPs), and the Stakeholder Engagement Plan (SEP)—must be disclosed in accessible formats, including local languages and non-technical summaries. These documents should be made publicly available both online and within local community platforms.
- **Adaptive Management of Stakeholder Engagement:** The SEP is considered a *living document* under OS 10. This means that it must be periodically reviewed and updated to reflect changes in project design, stakeholder priorities, or contextual dynamics. Flexibility and responsiveness are essential for the SEP to remain effective and credible throughout the project duration.

In essence, AfDB's OS 10 not only provides a robust framework for promoting participatory development and social inclusion, but also ensures that the rights, concerns, and aspirations of local communities are fully integrated into the SAPZ project. By adhering to these standards, the Kaduna SAPZ project commits to fostering trust, building social license, and enhancing development outcomes through transparent and respectful stakeholder relationships.

### 4.3 International Finance Corporation (IFC) Performance Standard

#### 1: Assessment and Management of Environmental and Social Risks and Impacts

While the International Finance Corporation (IFC) is not a direct financier of the Special Agro-Industrial Processing Zone (SAPZ) project in Kaduna State, its Performance Standards remain globally recognized benchmarks for responsible environmental and social (E&S) practices. In particular, IFC Performance Standard 1 (PS1) on *Assessment and Management of Environmental and Social Risks and Impacts* is especially relevant to the formulation and implementation of effective stakeholder engagement strategies.

PS1 outlines comprehensive requirements for identifying, assessing, managing, and monitoring E&S risks throughout the project lifecycle. A central component of this standard is robust stakeholder engagement, designed to ensure that all relevant voices—especially those of project-affected persons (PAPs), vulnerable groups, and civil society actors—are meaningfully incorporated into decision-making processes. The intent is to foster informed participation, minimize adverse impacts, and enhance social license for development interventions.

**Key principles and requirements of PS1 that shape the SAPZ SEP include:**



- **Initiating Stakeholder Engagement Early:** Engagement must begin at the earliest stage of project conception—ideally during project screening and scoping—and continue throughout implementation, operation, and decommissioning. This approach helps in identifying potential risks and opportunities before irreversible decisions are made.
- **Comprehensive Stakeholder Identification and Analysis:** PS1 emphasizes the importance of identifying all relevant stakeholders, including local communities, traditional authorities, farmers’ cooperatives, women’s groups, youth associations, and particularly vulnerable or marginalized groups who may be disproportionately affected by the project. Tailored strategies must be developed to ensure their effective inclusion.
- **Proportionality to Risk and Scale:** The depth and complexity of stakeholder engagement must be commensurate with the nature, magnitude, and complexity of potential E&S risks and impacts. For a large-scale agro-industrial project like the SAPZ, this entails structured consultations, multiple engagement platforms, and sustained outreach activities.
- **Information Disclosure and Informed Consultation:** PS1 mandates that affected stakeholders are provided with **timely, relevant, understandable, and accessible information**. This includes disclosing environmental and social documentation, such as the ESIA, SEP, RAP, and LRP, in **local languages** and formats appropriate for community contexts. Consultations must be conducted in a culturally sensitive, gender-inclusive, and respectful manner.
- **Integration of Stakeholder Feedback:** The standard requires that feedback from stakeholders be actively considered in the project’s environmental and social risk management framework. Adjustments to project design, mitigation strategies, or compensation packages should reflect community concerns where appropriate.
- **Transparent and Functional Grievance Mechanisms:** PS1 calls for the establishment of Grievance Redress Mechanisms (GRMs) that are accessible, fair, and responsive. These mechanisms must allow stakeholders to voice concerns or complaints without fear of retribution and ensure prompt resolution and documentation of such issues.

By adopting the core principles of IFC Performance Standard 1, the SAPZ Stakeholder Engagement Plan for Kaduna aligns with globally accepted good practice. This approach ensures that the project meets not only donor expectations but also reinforces principles of transparency, inclusivity, accountability, and sustainable development. In doing so, the SEP promotes stronger community relationships, reduces social risks, and enhances project outcomes through participatory ownership and mutual trust.



#### **4.4 International Fund for Agricultural Development (IFAD) Social, Environmental and Climate Assessment Procedures (SECAP)**

As a key development partner in the Special Agro-Industrial Processing Zones (SAPZ) initiative, the International Fund for Agricultural Development (IFAD) brings a strong emphasis on inclusive, climate-resilient, and socially responsible development. The SAPZ project in Kaduna State is aligned with IFAD's agricultural transformation goals, particularly those targeting rural development, smallholder livelihoods, and community empowerment. Accordingly, the Social, Environmental and Climate Assessment Procedures (SECAP), updated in 2021, provide a critical framework for stakeholder engagement within the project.

IFAD's SECAP is designed to ensure that development projects are not only technically and economically viable, but also environmentally sustainable, socially inclusive, and climate-resilient. The procedures emphasize that stakeholder engagement must be meaningful, context-sensitive, and embedded throughout the project lifecycle—from planning and design through implementation and monitoring. In the context of the SAPZ project, adherence to SECAP ensures that stakeholders, particularly vulnerable and marginalized groups, are not left behind in the development process.

##### **Key Provisions of SECAP Relevant to the SEP:**

- **Participatory and Inclusive Development:** SECAP mandates that project planning and implementation actively involve women, youth, persons with disabilities, indigenous peoples, and other marginalized groups. This ensures that development outcomes are equitable and responsive to the diverse needs and perspectives of local stakeholders.
- **Free, Prior, and Informed Consent (FPIC):** In cases where project interventions may impact customary land rights, cultural heritage, or community livelihoods, SECAP requires the application of FPIC principles. This reinforces the right of communities to be fully informed, consulted in a culturally appropriate manner, and able to withhold consent without coercion or manipulation.
- **Integration of Climate and Environmental Considerations:** Stakeholder engagement must integrate climate change mitigation and adaptation measures, particularly in agriculture and natural resource use. SECAP calls for climate-resilient approaches to be co-developed with communities, recognizing local knowledge and adaptive capacity.
- **Context-Specific Mitigation and Management Measures:** SECAP emphasizes the use of stakeholder inputs to inform the design of social and environmental management plans. This includes developing mitigation strategies that reflect community priorities and are grounded in local realities.
- **Empowerment and Local Ownership:** Rather than treating local populations as passive recipients of development aid, SECAP promotes community-led development. This involves building capacity, enhancing local governance mechanisms, and ensuring continuous two-way communication throughout the project lifecycle.



### **Implications for SAPZ Kaduna Stakeholder Engagement:**

The application of the IFAD Social, Environmental and Climate Assessment Procedures (SECAP) within the SAPZ project in Kaduna State carries profound implications for how stakeholder engagement is conceptualized, structured, and implemented. Integrating SECAP principles reinforces the project's alignment with international best practices for inclusive, rights-based, and environmentally responsible development. It signals a deliberate commitment to ensuring that development interventions are not only technically sound but also socially acceptable and contextually relevant.

By operationalizing the SECAP framework, the SAPZ initiative prioritizes equity, transparency, and inclusivity across all phases of the stakeholder engagement process. Particular emphasis is placed on reaching historically marginalized and vulnerable populations—including women, youth, persons with disabilities, and indigenous peoples—whose voices are often underrepresented in development discourse. The approach ensures that their perspectives, concerns, and aspirations are not only acknowledged but are actively integrated into decision-making processes through structured consultations and participatory mechanisms.

Moreover, the emphasis on Free, Prior, and Informed Consent (FPIC), especially in contexts where interventions may affect customary land rights, livelihoods, or cultural heritage, safeguards community rights and prevents the emergence of conflicts or grievances. This requirement enhances the project's social license to operate by fostering trust, legitimacy, and mutual understanding between the project developers and local communities.

The SECAP framework also compels the SAPZ project to embed climate resilience and environmental sustainability into stakeholder dialogues. By facilitating discussions around climate risks, resource use, and adaptation strategies, stakeholders become active partners in shaping environmentally sustainable solutions that are both locally appropriate and globally relevant.

Ultimately, the application of SECAP guidelines transforms stakeholder engagement from a compliance-driven obligation into a strategic, iterative, and empowering process. It creates a feedback loop where community input informs project design, implementation, and monitoring—thus enhancing project ownership, minimizing social and environmental risks, and promoting long-term developmental impact. In this way, the SAPZ project evolves as a model for inclusive agricultural transformation, built on a foundation of trust, collaboration, and shared responsibility.

## **CHAPTER FIVE: STAKEHOLDERS IDENTIFICATION AND ANALYSIS**

Stakeholder identification and analysis form the cornerstone of an effective and inclusive stakeholder engagement process. For a complex, multi-dimensional initiative such as the Special Agro-Industrial Processing Zones (SAPZ) Project in Kaduna State, a systematic understanding of all individuals, groups, institutions, and entities that may be affected by or have an interest in the project is essential. This process not only supports the development of a responsive and



participatory Stakeholder Engagement Plan (SEP), but also ensures alignment with international best practices such as the African Development Bank's Integrated Safeguards System (ISS), IFC Performance Standard 1, and IFAD's SECAP framework—all of which emphasize stakeholder inclusion, vulnerability mapping, and social accountability.

In the context of the SAPZ project, stakeholder identification is not limited to recognizing project beneficiaries or local community members. It encompasses a broad spectrum of actors including government institutions at federal, state, and local levels; traditional authorities; civil society organizations; private sector operators; environmental and agricultural regulators; host communities; women's groups; youth-led organizations; and vulnerable or marginalized populations. Each of these stakeholder categories holds varying degrees of influence, expectations, interest, and vulnerability in relation to the project.

Conducting a stakeholder analysis allows the project team to classify stakeholders based on their influence, interest, and potential impact—either positive or negative—on project outcomes. It further facilitates the development of tailored engagement strategies that address the unique needs, priorities, and concerns of different groups. By identifying key stakeholders early in the project lifecycle, the SAPZ initiative is better positioned to foster social cohesion, promote transparency, mitigate potential conflicts, and build trust among actors who are critical to the successful implementation and long-term sustainability of the project.

Moreover, special consideration is given to those stakeholders who may be disadvantaged or at risk of exclusion due to social, cultural, economic, or geographic barriers. This includes smallholder farmers, land users without formal titles, pastoralists, women-headed households, persons with disabilities, and internally displaced persons (IDPs). Their meaningful participation is crucial in ensuring that project benefits are equitably distributed and that potential adverse impacts are mitigated in a timely and just manner.

This section provides a detailed mapping and categorization of the key stakeholders relevant to the SAPZ project in Kaduna State. It highlights their roles, levels of interest and influence, as well as recommended approaches for continuous and constructive engagement throughout the project lifecycle—from planning and design, through implementation, to monitoring and eventual decommissioning.

## **5.1 Project Stakeholder Identification and Analysis**

Stakeholder identification and analysis form the cornerstone of an effective and inclusive stakeholder engagement process. For a complex, multi-dimensional initiative such as the Special Agro-Industrial Processing Zones (SAPZ) Project in Kaduna State, a systematic understanding of all individuals, groups, institutions, and entities that may be affected by or have an interest in the project is essential. This process not only supports the development of a responsive and participatory Stakeholder Engagement Plan (SEP), but also ensures alignment with international best practices such as the African Development Bank's Integrated Safeguards System (ISS), IFC Performance Standard 1, and IFAD's SECAP framework—all of which emphasize stakeholder inclusion, vulnerability mapping, and social accountability.



In the context of the SAPZ project, stakeholder identification is not limited to recognizing project beneficiaries or local community members. It encompasses a broad spectrum of actors including government institutions at federal, state, and local levels; traditional authorities; civil society organizations; private sector operators; environmental and agricultural regulators; host communities; women's groups; youth-led organizations; and vulnerable or marginalized populations. Each of these stakeholder categories holds varying degrees of influence, expectations, interest, and vulnerability in relation to the project.

Conducting a stakeholder analysis allows the project team to classify stakeholders based on their influence, interest, and potential impact—either positive or negative—on project outcomes. It further facilitates the development of tailored engagement strategies that address the unique needs, priorities, and concerns of different groups. By identifying key stakeholders early in the project lifecycle, the SAPZ initiative is better positioned to foster social cohesion, promote transparency, mitigate potential conflicts, and build trust among actors who are critical to the successful implementation and long-term sustainability of the project.

Moreover, special consideration is given to those stakeholders who may be vulnerable or at risk of exclusion due to social, cultural, economic, or geographic barriers. This includes smallholder farmers, land users without formal titles, pastoralists, women-headed households, persons with disabilities, and internally displaced persons (IDPs). Their meaningful participation is crucial in ensuring that project benefits are equitably distributed and that potential adverse impacts are mitigated in a timely and just manner.

This section provides a detailed mapping and categorization of the key stakeholders relevant to the SAPZ project in Kaduna State. It highlights their roles, levels of interest and influence, as well as recommended approaches for continuous and constructive engagement throughout the project lifecycle—from planning and design, through implementation, to monitoring and eventual decommissioning.

## **5.2 Primary, Secondary, and Tertiary Stakeholders**

Stakeholders are individuals, groups, or institutions that have an interest in, are affected by, or can influence the implementation and outcomes of a project. Effective stakeholder categorization allows for a more strategic engagement process, ensuring that each group is consulted according to their level of influence, interest, and potential impact. For the SAPZ Project in Kaduna State, stakeholders have been classified into primary, secondary, and tertiary categories to guide the development of targeted engagement strategies and inclusive decision-making.

### **a. Primary Stakeholders**

Primary stakeholders are those who are directly and immediately affected—positively or negatively—by the SAPZ project's implementation. This includes project-affected persons (PAPs), host communities, smallholder farmers, women, youth, and local businesses within the Agricultural Transformation Center (ATC) and Agro-Industrial Hub (AIH) zones. They are central



to the project’s success and must be actively involved throughout the project lifecycle to ensure their concerns are addressed and benefits are equitably shared.

### b. Secondary Stakeholders

Secondary stakeholders are those who may not be directly affected by project activities but play a significant role in supporting, regulating, or implementing the project. These include government ministries, regulatory agencies (such as FMEnv and KEPA), civil society organizations, cooperatives, service providers, and local government authorities. Their contributions are critical for project oversight, compliance with laws and policies, and provision of technical or institutional support.

### c. Tertiary Stakeholders

Tertiary stakeholders are institutions or actors with an indirect interest in the project. While they may not be directly affected by or involved in daily project operations, they influence the broader development, policy, or knowledge context of the project. These include national and international development partners (e.g., AfDB, IFAD, FAO), academia, research institutions, financial institutions, and the media. Their role is vital in terms of financing, knowledge sharing, best practices dissemination, and accountability promotion.

Table 5.1: Categorization of Stakeholders for SAPZ Project in Kaduna State

Stakeholder Category	Examples	Role/Interest in SAPZ Project
<b>Primary Stakeholders</b>	<ul style="list-style-type: none"> <li>Project-affected persons (PAPs)</li> <li>Local farmers and processors - Women and youth - Local host communities (e.g., Kuzuntu, Daki-Takwas)</li> </ul>	Directly impacted by land acquisition, livelihoods, resettlement, and service delivery; key beneficiaries of infrastructure, skills, and value chain integration.
<b>Secondary Stakeholders</b>	<ul style="list-style-type: none"> <li>Local Government Authorities (e.g., Kubau and Chikun LGAs)</li> <li>FMEnv, KEPA</li> <li>State Ministries of Agriculture, Environment, Lands, Women Affairs</li> <li>CSOs and cooperatives</li> </ul>	Policy and regulatory oversight, project facilitation, grievance handling, and support services.
<b>Tertiary Stakeholders</b>	<ul style="list-style-type: none"> <li>African Development Bank (AfDB) – IFAD</li> <li>FAO</li> <li>Development consultants</li> </ul>	Provide funding, technical guidance, research, advocacy, policy influence, and promote transparency and learning.



Stakeholder Category	Examples	Role/Interest in SAPZ Project
	<ul style="list-style-type: none"> <li>• Universities and research centers</li> <li>• Media</li> </ul>	

### Integration of Local Context

The SEP for the SAPZ project in Kaduna State is designed to be deeply responsive to the unique socio-cultural, environmental, and security realities of the two key project sites—Kuzuntu–Dutsen-Wai in Kubau Local Government Area (LGA) and Taki-Takwas in Chikun LGA. By embedding local context into the engagement strategy, the project ensures that consultations are relevant, inclusive, and effective.

### How Concerns, Risks, and Opportunities Were Identified

The concerns, risks, and opportunities outlined below were systematically derived through a combination of community consultations, focus group discussions (FGDs), key informant interviews (KIIs), and stakeholder workshops held during the ESIA scoping phase (May–July 2025). These engagements involved traditional leaders, women’s groups, youth associations, farmer cooperatives, local government officials, and informal business operators. They were also cross validated with baseline socio-economic surveys. Each item is therefore based on lived community realities, project-specific baseline findings, and concerns raised directly by affected persons and stakeholders.

### 1. Site-Specific Stakeholder Concerns, Risks, and Opportunities

#### • Kuzuntu–Dutsen-Wai (Kubau LGA):

- **Concerns:** Communities expressed worries about past land disputes and unresolved boundary issues, lingering mistrust due to unfulfilled promises from earlier development interventions, and the potential loss of farmland currently under cultivation at the ATC site.
- **Risks:** If commitments made under the SAPZ project are not honored, grievances may escalate into community resistance. In addition, the seasonal migration of youth for farming activities could reduce consistent participation in stakeholder engagements, leading to gaps in representation.
- **Opportunities:** Traditional leaders (chiefs, ward heads, religious figures) maintain significant influence and can mobilize broad-based community support if adequately engaged. Furthermore, existing farmer cooperatives in Dutsen-Wai present a practical entry point for integrating livelihood restoration and training programs, ensuring stronger buy-in.



• **Taki-Takwas (Chikun LGA):**

- **Concerns:** Stakeholders highlighted fears of displacement due to potential loss of farmlands currently under cultivation at the AIH site, coupled with lingering mistrust from past experiences where communities were resettled to faraway locations after land take for development. These experiences fuel anxiety about inadequate compensation and weakened access to livelihood resources.
- **Risks:** With rapid urban expansion pressures in Chikun LGA, vulnerable groups such as migrant workers and informal dwellers risk being excluded from project benefits if not deliberately targeted. Additionally, community dissatisfaction over farmland loss could escalate grievances and slow down project implementation.
- **Opportunities:** The area demonstrates a high level of women's participation in local value chains, particularly in vegetable trading and small-scale processing, which can be leveraged to strengthen gender-inclusive programming. Its proximity to existing agro-processing facilities and highway trade routes also creates opportunities for synergies, value chain linkages, and expanded markets that could benefit both PAPs and new agribusiness investors.

## 2. Cultural, Seasonal, and Security Realities

- **Cultural:** Engagement processes will respect traditional protocols, ensuring that meetings with the Emirate Councils, village heads, and religious leaders occur before wider community consultations. Gender-segregated meetings will be organized where cultural norms require, ensuring that women have a safe space to express concerns and suggestions.
- **Seasonal:** Consultations will be scheduled outside peak farming periods (e.g., planting in May–June, harvest in September–October) to ensure availability of key stakeholders.
- **Security:** All field engagements will be planned in coordination with local security agencies and community vigilante groups, considering current insecurity in parts of Kaduna State.

## 3. Language and Communication Approaches

- **Hausa Language:** All community engagement materials—including flyers, posters, and grievance forms—will be translated into Hausa. Interpreters will be used during consultations to ensure clarity and inclusivity.
- **Local Radio Stations:** Engagement announcements, GRM awareness messages, and project updates will be aired on popular local radio stations such as Freedom Radio Kaduna, with scheduling during peak listening times (early morning and evening).

By integrating these localized strategies, the SEP moves beyond generic compliance to create a context-driven engagement framework that builds trust, reduces risks, and maximizes the social and economic benefits of the SAPZ initiative in both project locations.



### 5.3 Stakeholder Influence–Interest Matrix

The Stakeholder Influence–Interest Matrix is a strategic tool used to systematically classify and prioritize stakeholders based on two critical dimensions: their level of influence over the project and their degree of interest in its outcomes. This matrix helps project planners, such as those implementing the SAPZ initiative in Kaduna State, to develop tailored engagement strategies that align with the expectations, power dynamics, and potential impact of various stakeholder groups.

#### Definitions

- **Influence** refers to the degree of power a stakeholder possesses to affect project decisions, directions, resources, or outcomes. This power may stem from regulatory authority, funding control, political position, traditional leadership, or organizational leverage.
- **Interest** reflects the extent to which a stakeholder is affected by the project or is concerned about its outcomes. This can include economic benefits, environmental risks, cultural implications, or social well-being.

By mapping stakeholders along these two axes—high/low influence and high/low interest—project teams can determine how best to engage each group in a manner that is efficient, meaningful, and aligned with both project goals and stakeholder needs.



Table 5.2: Quadrants of the Matrix

Quadrant	Stakeholder Profile	Examples of Stakeholders	Engagement Strategy
<p><b>High Influence / High Interest</b> (<i>Key Players</i>)</p>	<p>These are critical stakeholders with high decision-making power and vested interest in the project's outcomes. Their support is essential for project success.</p>	<ul style="list-style-type: none"> <li>• Federal Ministry of Environment (FMEnv)</li> <li>• Kaduna State Environmental Protection Authority (KEPA)</li> <li>• African Development Bank (AfDB)</li> <li>• IFAD</li> <li>• Traditional rulers (e.g., Emir, Village Heads)</li> <li>• Local Government Chairpersons</li> </ul>	<p>Engage proactively and regularly. Involve them in all phases (planning to monitoring), co-design strategies, invite them to steering committees, and provide frequent updates through reports, technical meetings, and formal consultations. Build trust through collaboration.</p>
<p><b>High Influence / Low Interest</b> (<i>Latent Stakeholders</i>)</p>	<p>These groups have considerable power to influence the project but are less directly impacted or involved. Their interest might be limited unless their institutional mandate is triggered.</p>	<ul style="list-style-type: none"> <li>• National Assembly members</li> <li>• Ministry of Finance-State Ministries not directly implementing the project</li> <li>• International development agencies</li> </ul>	<p>Keep satisfied and manage relationships carefully. Provide periodic updates, invite them to milestone events, and monitor their perceptions. Be responsive to any emerging interests or political shifts.</p>



Quadrant	Stakeholder Profile	Examples of Stakeholders	Engagement Strategy
		with regional presence	
<b>Low Influence / High Interest</b> <i>(Priority Beneficiaries)</i>	These are vulnerable or directly affected groups with limited ability to shape the project, yet they are central to its success. Ignoring them can lead to social unrest or exclusion.	<ul style="list-style-type: none"> <li>• Project-affected persons (PAPs)</li> <li>• Women’s associations</li> <li>• Youth groups</li> <li>• Farmers’ cooperatives</li> <li>• Local SMEs and vendors- Landowners</li> <li>• Persons with disabilities</li> </ul>	Empower and ensure meaningful participation. Use culturally appropriate methods like community meetings, focus group discussions in local languages, pictorial IEC materials, and grievance redress mechanisms. Provide capacity-building opportunities to strengthen voice and influence.
<b>Low Influence / Low Interest</b> <i>(Minimal Stakeholders)</i>	These stakeholders are distant, have low stakes, and minimal power to affect or be affected by the project. They may have some peripheral interest.	<ul style="list-style-type: none"> <li>• Academic institutions</li> <li>• Media observers</li> <li>• Civil society organizations not operating locally</li> <li>• Unaffected nearby communities</li> </ul>	Monitor passively. Provide public access to basic project information, engage, when necessary (e.g., for research or environmental awareness), and consider them in future partnerships. Focus engagement resources elsewhere.



## Summary Insight

This quadrant-based engagement approach allows the SAPZ Project in Kaduna to optimize resources, prevent stakeholder-related delays, and enhance project ownership, particularly among the most vulnerable or influential actors. Ensuring equitable representation and transparent communication across these quadrants also supports alignment with the IFC Performance Standards, AfDB Operational Safeguards, and IFAD's SECAP guidelines.

## Benefits of Using the Matrix in SAPZ Kaduna

- **Enhances Resource Allocation:** Allows the project team to focus engagement efforts where they are most impactful.
- **Promotes Equity:** Ensures that marginalized or vulnerable groups receive tailored attention despite having less influence.
- **Supports Risk Management:** Identifies stakeholders that could pose challenges or risks if not adequately consulted or informed.
- **Strengthens Transparency:** Clarifies why certain groups are prioritized and how engagement strategies are differentiated.



Table 5.3: Stakeholder Influence–Interest Matrix for SAPZ Project, Kaduna State

Stakeholder Group	Influence	Interest	Stakeholder Category	Engagement Strategy
<b>Host Communities (Kuzuntu, Dutsen-Wai, Daki-Takwas)</b>	Medium	High	Primary	Community forums, FPIC processes, benefit-sharing agreements
<b>Traditional Institutions (Village Heads, Chiefs, Religious Leaders)</b>	Medium	High	Primary	Courtesy meetings, community dialogue facilitation, dispute resolution support
<b>Project Affected Persons (PAPs)</b>	Low	Very High	Primary	One-on-one consultations, livelihood restoration planning, grievance redress channels
<b>Farmers' Associations &amp; Cooperatives</b>	Medium	High	Primary	Capacity-building sessions, extension services, joint planning participation
<b>Youth &amp; Women Groups</b>	Low	High	Primary	Targeted empowerment initiatives, inclusive design workshops, dedicated consultation platforms
<b>Vulnerable &amp; Marginalised Groups (Elders, Persons with Disabilities, Female-headed households, Migrant workers)</b>	Low	Very High	Primary	Targeted outreach, culturally appropriate consultation, tailored livelihood support measures
<b>Local Government Authorities (Kubau, Chikun LGAs)</b>	Medium	High	Primary	Joint implementation meetings, grievance handling, awareness campaigns



Stakeholder Group	Influence	Interest	Stakeholder Category	Engagement Strategy
<b>Kaduna State Ministry of Agriculture &amp; Forestry</b>	High	High	Primary	Strategic planning workshops, MoUs, policy dialogues
<b>Kaduna State Ministry of Environment, Kaduna Environmental Protection Agency (KEPA), State Emergency Management Agency (SEMA)</b>	High	High	Primary	Environmental monitoring, ESMP implementation workshops, climate resilience integration
<b>Kaduna Investment Promotion Agency (KADIPA)</b>	High	High	Primary	Investor facilitation meetings, PPP frameworks, progress reporting
<b>Federal Ministry of Agriculture &amp; Food Security (FMAFS)</b>	High	High	Primary	Regular consultations, policy alignment, decision-making participation
<b>National Program Coordination Unit (NPCU – FMAFS)</b>	High	High	Primary	Oversight missions, safeguard monitoring, alignment with national SAPZ framework
<b>Federal Ministry of Environment (FMEnv)</b>	High	Medium	Secondary	EIA review consultations, environmental compliance monitoring
<b>African Development Bank (AfDB)</b>	High	High	Primary	Continuous engagement, safeguard compliance reporting, supervision missions
<b>Industrial Off-takers &amp; Agribusinesses</b>	High	High	Secondary	B2B forums, investor roundtables, operational consultations



Stakeholder Group	Influence	Interest	Stakeholder Category	Engagement Strategy
<b>Contractors and Consultants (ESIA, RAP, Engineers)</b>	High	Medium	Secondary	Service-level agreements, technical progress reviews, compliance assurance
<b>Security Agencies (Police, Civil Defence, Vigilante Groups)</b>	Medium	Medium	Secondary	Risk mitigation coordination, security briefings, emergency protocols
<b>Environmental NGOs / CSOs (e.g., NGOs on land, rights, biodiversity)</b>	Medium	Medium	Secondary	Thematic workshops, monitoring involvement, advocacy dialogues
<b>Academic &amp; Research Institutions (e.g., ABU Zaria, Kaduna Polytechnic)</b>	Medium	Medium	Secondary	Research partnerships, policy advisory, capacity-building collaborations
<b>IFAD, FAO, World Bank (Non-funding partners)</b>	Medium	Medium	Tertiary	Peer reviews, coordination meetings, knowledge-sharing platforms
<b>Financial Institutions (Commercial Banks, Microfinance Banks)</b>	Medium	Medium	Tertiary	Financing dialogues, credit support for SMEs, financial literacy sessions
<b>Media (Local Radio, TV, Print, Online Platforms)</b>	Low	Medium	Tertiary	Awareness campaigns, press briefings, site visits for transparency



### **How to Use the Matrix:**

- **High Influence–High Interest (Manage Closely):** These are the most important stakeholders (e.g., AfDB, State Government, Host Communities). They must be actively involved in decisions.
- **High Influence–Low Interest (Keep Satisfied):** Ensure these stakeholders are kept updated to avoid disinterest turning into resistance (e.g., FMEnv).
- **Low Influence–High Interest (Keep Informed):** These groups may not affect the project much, but they are strongly affected by it (e.g., PAPs, Women, Youth). Empowerment and transparency are key.
- **Low Influence–Low Interest (Monitor):** Their role is minimal, but occasional updates help maintain goodwill (e.g., general media, tertiary stakeholders).



## CHAPTER SIX-STAKEHOLDER ENGAGEMENT APPROACH AND PRINCIPLES

Stakeholder engagement is a fundamental pillar of responsible project planning, implementation, and sustainability, particularly in projects with wide-ranging environmental and social impacts such as the Special Agro-Industrial Processing Zones (SAPZ) initiative in Kaduna State. Meaningful stakeholder engagement goes beyond regulatory compliance—it is about fostering inclusive dialogue, building trust, strengthening project legitimacy, and enabling local ownership of development processes.

For the SAPZ project, stakeholder engagement is approached as a continuous, proactive, and strategic process aimed at integrating the views, concerns, expectations, and knowledge of all stakeholders—especially the most vulnerable—into every phase of the project. This participatory approach is guided by both national regulatory requirements (e.g., the Nigerian EIA Act) and international best practices (e.g., AfDB Operational Safeguards, IFC Performance Standards, and IFAD’s SECAP Guidelines).

The engagement strategy recognizes that stakeholders are diverse in their interests, influence, and levels of impact. Therefore, the SAPZ project applies a tailored approach that ensures engagement is inclusive, context-specific, culturally sensitive, gender-responsive, and accessible to all categories of stakeholders including traditional leaders, government agencies, farmer cooperatives, civil society groups, women, youth, and vulnerable populations.

The principles that guide the stakeholder engagement approach for the SAPZ project include:

- **Transparency** – Providing timely, accurate, and clear information throughout the project cycle.
- **Inclusiveness** – Ensuring all affected and interested parties, regardless of gender, age, status, or literacy level, have equal opportunities to participate.
- **Free, Prior, and Informed Consent (FPIC)** – Particularly for communities with customary rights or land tenure claims.
- **Accountability** – Establishing clear mechanisms for addressing grievances and feedback.
- **Respect and Cultural Sensitivity** – Engaging stakeholders in ways that respect local traditions, values, and decision-making structures.
- **Two-Way Communication** – Prioritizing dialogue over one-way dissemination of information to build mutual understanding and cooperation.

Through this framework, the SAPZ stakeholder engagement process becomes a living, evolving mechanism that not only identifies and mitigates risks but also unlocks opportunities for co-development, resilience building, and long-term project sustainability.



## 6.1 Inclusivity and Gender Sensitivity

Inclusivity and gender sensitivity are core values underpinning the stakeholder engagement process of the SAPZ project in Kaduna State. Ensuring that all voices are heard—especially those of marginalized, vulnerable, and underrepresented groups—is not only a human rights imperative but also a practical necessity for achieving sustainable and socially acceptable project outcomes.

### 1. The Importance of Inclusive Engagement

An inclusive approach ensures that stakeholders of different socio-economic backgrounds, ethnicities, ages, literacy levels, physical abilities, and cultural affiliations are actively involved in the project lifecycle. In the context of the SAPZ initiative, inclusivity means intentionally reaching out to and incorporating the perspectives of:

- Women and girls
- Youth (especially unemployed or underemployed individuals)
- Persons with disabilities
- Minority ethnic and religious groups
- Informal workers (e.g., petty traders, waste pickers)
- Tenant farmers and displaced persons
- Elderly or chronically ill individuals
- Traditional authorities and community-based institutions

This inclusive lens helps to surface the often-overlooked concerns and aspirations of these groups, allowing the project to design fairer, more context-relevant interventions that reduce social conflict and enhance community buy-in.

## 6.2. Gender Sensitivity in Stakeholder Engagement

Gender sensitivity goes beyond simply involving women in meetings. It requires understanding and addressing the **systemic barriers**—social, economic, cultural, and institutional—that limit women's and girls' participation in decision-making processes, access to land, resources, training, and benefits from development programs.

Key actions to ensure gender sensitivity in this project include:

- **Gender-Disaggregated Data Collection:** All stakeholder assessments and baseline studies collect sex-disaggregated data to identify specific needs, roles, and impacts on men, women, and other gender groups.
- **Women-Only Consultations and Focus Groups:** Conducting separate, safe spaces for women's participation to ensure their voices are not overshadowed in male-dominated settings.



- **Timing and Location of Meetings:** Scheduling consultations at times and venues that are convenient and safe for women, including those with caregiving responsibilities.
- **Use of Female Facilitators:** Employing trained female facilitators and interpreters, especially in conservative communities, to foster trust and participation.
- **Mainstreaming Gender in Project Design:** Ensuring that women and other gender minorities are targeted for skills development, employment opportunities, and benefit-sharing mechanisms.
- **Capacity Building and Empowerment:** Strengthening the capacity of women's groups and cooperatives to engage effectively in project planning, monitoring, and advocacy.

### 6.3. Culturally Appropriate Engagement

Recognizing cultural dynamics is essential to ensure inclusivity. In some communities, speaking publicly in front of elders or men may be restricted for women or youth. The SAPZ engagement team, therefore, adopts culturally sensitive methodologies that respect traditional norms while creating safe, meaningful spaces for participation. This includes working with respected local intermediaries, such as women leaders, youth representatives, and traditional gatekeepers.

### 6.4. Accountability and Feedback Mechanisms

To uphold inclusivity, the project embeds **accessible grievance redress mechanisms** that are responsive to the needs of all stakeholders, particularly women and vulnerable groups who may face social or institutional barriers to expressing concerns. These mechanisms ensure that feedback is addressed promptly, transparently, and respectfully, thereby reinforcing trust and social legitimacy.

An inclusive and gender-sensitive engagement approach is not a peripheral activity—it is central to the success and sustainability of the SAPZ project. By deliberately creating space for diverse voices, removing structural barriers, and promoting equitable participation, the project ensures that no one is left behind in the pursuit of agro-industrial transformation, rural development, and improved livelihoods across Kaduna State.



Table 6.1: Inclusive and Gender-Sensitive Stakeholder Engagement Approach for SAPZ – Kaduna State

Principle	Description	Application in SAPZ Project (Kaduna)	Alignment with Gender Frameworks
<b>Non-Discrimination</b>	All stakeholders are engaged without bias, regardless of gender, ethnicity, age, disability, religion, or socio-economic status.	Specific outreach to female-headed households, PWDs, youth, and minority ethnic groups in affected LGAs.	<ul style="list-style-type: none"> <li>• AfDB Gender Strategy: “Remove structural inequalities.”</li> <li>• Nigeria Gender Policy: “Promote equal participation.”</li> </ul>
<b>Gender-Responsive Participation</b>	Ensuring both women and men can participate fully and meaningfully in all stages of project planning and implementation.	Separate FGD sessions for women and men, women-inclusive local committees, child-care during meetings, and safe spaces.	<ul style="list-style-type: none"> <li>• AfDB Gender Strategy: “Empower women through participatory development.”</li> <li>• IFC PS1: “Meaningful consultation.”</li> </ul>
<b>Intersectionality</b>	Recognizing that women and men are not homogenous groups and addressing diverse vulnerabilities across gender, age, disability, etc.	Special attention to vulnerable sub-groups like adolescent girls, widows, young male farmers, and female informal workers.	<ul style="list-style-type: none"> <li>• Nigeria Gender Policy: “Consider multiple dimensions of disadvantage.”</li> <li>• AfDB: “Inclusive growth approach.”</li> </ul>
<b>Equal Access to Information</b>	Ensuring gender-sensitive communication methods and channels to reach all stakeholders.	Use of Hausa-language IEC materials, radio messages, visual aids, and oral communication tailored to reach non-literate women.	<ul style="list-style-type: none"> <li>• IFC PS1: “Culturally appropriate disclosure.”</li> <li>• AfDB: “Overcome information asymmetry.”</li> </ul>



Principle	Description	Application in SAPZ Project (Kaduna)	Alignment with Gender Frameworks
<b>Grievance Redress Accessibility</b>	Both women and men must be able to access the grievance redress mechanism (GRM) confidentially, safely, and equally.	Gender-balanced GRM teams, anonymous reporting options, and trained mediators in gender sensitivity.	<ul style="list-style-type: none"> <li>• AfDB ISS (2013) OS 10, “Accessible grievance mechanisms.”</li> <li>• Nigeria Gender Policy: “Support justice mechanisms for women.”</li> </ul>
<b>Capacity Building and Empowerment</b>	Building stakeholder capacity with a gender lens to promote leadership, negotiation, and enterprise development among women and men.	Women-targeted trainings on value chain participation, land rights awareness, and leadership for community engagement.	<ul style="list-style-type: none"> <li>• AfDB Gender Strategy: “Strengthen women’s economic resilience.”</li> <li>• Nigeria Gender Policy: “Promote women’s agency.”</li> </ul>

### 6.5 Free, Prior, and Informed Consultation (FPIC)

Free, Prior, and Informed Consultation (FPIC) is a critical principle in stakeholder engagement, particularly when engaging with local communities, traditional authorities, and vulnerable populations who may be directly or indirectly affected by a development project. FPIC is both a process and a right—ensuring that stakeholders are not only consulted but do so in a manner that respects their dignity, autonomy, and decision-making power.

Table 6.2: Definition of FPIC Components



<b>Component</b>	<b>Definition</b>	<b>Implications for SAPZ Project in Kaduna State</b>
<b>Free</b>	Consultation must be carried out in a way that is voluntary and free from coercion, intimidation, or manipulation.	All meetings with communities in Kuzuntu (Kubau LGA) and Daki-Takwas (Chikun LGA) must ensure safe and respectful environments, with no political or economic pressure to consent.
<b>Prior</b>	Engagement must occur <b>before</b> any project decisions are made, particularly before final site selection, land acquisition, or implementation.	The SAPZ project ensured initial consultations with traditional rulers and community stakeholders were conducted well before feasibility studies and ESIA activities.
<b>Informed</b>	Communities must be provided with adequate, accessible, and culturally appropriate information to make decisions.	Use of Hausa language materials, radio jingles, visual tools, and community drama ensured women, elders, and illiterate groups were properly informed of project implications.
<b>Consultation</b>	The process must be participatory, iterative, and respect local knowledge and decision-making structures.	Community leaders, women’s groups, and youth forums were actively involved through focus group discussions, townhall meetings, and joint decision-making processes.

Table 6.3: Operationalization of FPIC in the SAPZ Context



Stage	Action Taken or Required
<b>Pre-Feasibility &amp; Screening</b>	Identification of traditional leadership structures and initial sensitization of communities on project intentions.
<b>ESIA and RAP Baseline Studies</b>	Community mapping, village walk-throughs, and informal interviews conducted <i>before</i> data collection and impact assessments.
<b>Disclosure of Project Information</b>	Use of community meetings, radio programs, posters, and oral briefings to communicate project benefits, risks, timelines, and land implications.
<b>Consultation &amp; Agreement Processes</b>	Meetings held in traditional palaces and neutral locations to discuss community expectations and project footprint; recorded minutes, consent letters, and MOUs.
<b>Addressing Dissent and Grievances</b>	Mechanisms established to allow for dissent, such as the Kuzuntu incident where community reneged on earlier agreement; engagement continued through neutral mediators.
<b>Iterative Engagement</b>	Repeated consultations conducted to build trust and refine decisions; feedback from community integrated into site selection, design, and timing of construction.



Table 6.4: Alignment with Legal and Institutional Frameworks

Framework	FPIC Alignment and Requirements
<b>AfDB ISS (2023), OS1, OS2, OS 7 and OS10</b>	Mandates FPIC for projects affecting vulnerable groups or customary land users; consultation must be inclusive, documented, and part of project planning cycle.
<b>IFC PS1 &amp; PS7</b>	FPIC required where Indigenous Peoples or similarly vulnerable communities are affected; must be free of manipulation and reflect community-level consensus.
<b>Nigerian Constitution &amp; Land Use Act</b>	Recognizes customary land ownership and requires compensation; consultation with landowners and community heads is a prerequisite for land acquisition.
<b>Kaduna State Customary Practices</b>	Traditional rulers and community elders must be consulted for decisions related to land, resettlement, and community agreements.



## Key Lessons and Considerations from the SAPZ FPIC Process

- **Respect for traditional authority is critical:** The involvement of village heads (e.g., the Sarkin Kuzuntu) helped build legitimacy, although follow-up dialogue was required after community retractions.
- **Gender-specific consultations must be prioritized:** Women often require separate, safe forums to express concerns regarding land use, employment, and family well-being.
- **Documentation and transparency enhance trust:** Minutes, consent letters, visual documentation (photos/videos), and publicly posted information reduce misinformation and build long-term relationships.
- **Continuous engagement—not a one-time event:** FPIC should not end after land acquisition or ESIA submission. It must continue through construction, operation, and even decommissioning phases.

## 6.6 Vulnerable Group Engagement Strategy

The SAPZ project in Kaduna State recognizes the importance of proactively identifying, consulting, and integrating the views and concerns of vulnerable groups into project design, implementation, monitoring, and benefit-sharing mechanisms. Vulnerable groups, by definition, include individuals or communities who—due to age, gender, ethnicity, disability, livelihood status, displacement, or social marginalization—face a higher risk of exclusion, adverse project impacts, or barriers to participation in development processes.

Engaging these groups in a meaningful, respectful, and non-tokenistic manner is essential for promoting equity, social justice, and inclusive development—all of which are fundamental principles of the African Development Bank’s Operational Safeguard 7 and 10, the IFC Performance Standards, the Nigerian EIA Act, and the IFAD SECAP Guidelines.

### Key Vulnerable Groups in the SAPZ Kaduna Context

The SAPZ project has identified the following as priority vulnerable groups based on the socio-cultural, economic, and environmental context of the target areas (e.g., Dutsen-Wai-Kuzuntu in Kubau LGA and Daki-Takwas in Chikun LGA):

- Women, especially female-headed households and rural women farmers
- Youth and adolescents, particularly unemployed and underemployed rural youth
- Persons with disabilities (PWDs)
- Elderly persons, particularly those without family or institutional support
- Internally Displaced Persons (IDPs) and communities affected by conflict
- Indigenous ethnic minorities and marginalized community groups



- Poor smallholder farmers and informal sector workers

### **Engagement Strategies for Vulnerable Groups**

The project will adopt the following inclusive and tailored engagement strategies to ensure that vulnerable groups are meaningfully involved and fairly represented throughout the project cycle:



Table 6.5: Engagement Strategies for Vulnerable Groups

Strategy	Description	Alignment with Safeguard Frameworks
<b>Targeted Outreach</b>	Design and implement targeted outreach programs (e.g., women-only FGDs, youth forums, IDP cluster meetings) using trusted community facilitators.	AfDB OS 7 and 10; IFAD SECAP 2021; FMEnv Guidelines on Gender
<b>Use of Local Languages and Accessible Formats</b>	Ensure communication materials and meetings use local languages (e.g., Hausa) and formats accessible to the visually/hearing impaired.	IFC PS1; Nigerian Disability Act (2019)
<b>Representation in Decision-Making Bodies</b>	Facilitate the nomination and election of vulnerable group representatives to project governance platforms (e.g., community liaison committees).	IFAD SECAP; AfDB Gender Strategy
<b>Grievance Redress Inclusion</b>	Ensure GRM mechanisms are designed to be safe, anonymous, and accessible to vulnerable groups, including women and PWDs.	IFC PS1; FMEnv EIA Guidelines
<b>Gender-Sensitive Scheduling</b>	Schedule meetings and consultations at times convenient for women and caregivers, and in culturally safe venues.	AfDB Gender Marker System; IFAD SECAP
<b>Capacity Building and Empowerment</b>	Provide training and awareness for vulnerable groups on their rights, entitlements, and the scope of project activities.	IFAD SECAP; Nigerian National Gender Policy
<b>Monitoring of Inclusion</b>	Track the participation of vulnerable groups in engagement activities through disaggregated data collection (by gender, age, disability, etc.).	AfDB OS10 Monitoring Indicators



### **Implementation Considerations**

- Partnerships will be formed with local NGOs, women's cooperatives, disability advocacy groups, and youth-led organizations to implement these strategies effectively.
- Local Champions, such as female extension workers, traditional midwives, or youth leaders, will be trained and engaged as conduits for information flow and feedback.
- Special attention will be paid to avoid elite capture or gatekeeping by more powerful individuals or groups within the community.

### **Expected Outcomes**

By integrating these strategies, the SAPZ project aims to:

- Promote equal access to project benefits, employment, and livelihood opportunities;



- Minimize the risk of social conflict, marginalization, or project-related harm;
- Ensure social accountability, legitimacy, and sustainable development outcomes.



## CHAPTER SEVEN- ENGAGEMENT METHODS AND TOOLS

Effective stakeholder engagement is not only a regulatory requirement but also a foundational principle for ensuring transparency, social acceptability, and sustainability of development projects like the Special Agro-Industrial Processing Zone (SAPZ) in Kaduna State. Given the diversity of stakeholders involved—from local farmers and women’s groups to traditional leaders, government authorities, and development partners—selecting appropriate engagement methods and tools is critical to fostering meaningful dialogue, building trust, and encouraging shared ownership of project outcomes.

Engagement methods refer to the various formats and channels through which information is shared, feedback is solicited, and dialogue is facilitated between the project and its stakeholders. These can range from public meetings and focus group discussions to radio programs, community mapping, and digital platforms. Tools, on the other hand, refer to the instruments and resources used to support these methods—such as stakeholder databases, feedback forms, grievance redress mechanisms, visual aids, and participatory rural appraisal (PRA) techniques.

In line with international best practices (AfDB Operational Safeguard 10, IFC PS1, IFAD SECAP) and Nigeria’s Environmental Impact Assessment (EIA) Act CAP E12 LFN, 2004, the SAPZ project adopts a combination of inclusive, culturally sensitive, and context-specific engagement methods. Special consideration is given to ensuring accessibility for women, youth, people with disabilities, minority ethnic groups, and those with limited literacy or language barriers.

This section outlines the tailored suite of engagement approaches and tools selected to effectively reach each stakeholder group across different phases of the SAPZ project—pre-construction, construction, and operation. It emphasizes flexibility, two-way communication, and continuous learning to adapt to evolving community dynamics and emerging project realities.

### 7.1 Public Consultations and Town Hall Meetings

Public consultations and town hall meetings are vital components of stakeholder engagement that provide structured platforms for inclusive dialogue, transparency, and mutual understanding between project proponents and affected communities. These forums are essential in capturing local perspectives, addressing concerns, and enhancing community buy-in throughout the lifecycle of the Special Agro-Industrial Processing Zone (SAPZ) Project in Kaduna State.

#### Purpose and Objectives

The primary objective of public consultations and town hall meetings is to provide stakeholders—especially local communities and grassroots groups—with an opportunity to:

- Receive accurate and accessible information about the SAPZ project, including its scope, timelines, and potential impacts.



- Express their views, needs, and expectations regarding the project’s design, implementation, and benefits.
- Raise concerns or grievances related to land acquisition, resettlement, environmental impacts, and social risks.
- Contribute local knowledge, traditional values, and cultural insights that can inform project adaptation and sustainability.
- Strengthen accountability and build trust between stakeholders and project implementers, thereby reducing misinformation and conflict.

### Structure and Format

Public consultations and town hall meetings are typically structured as open, participatory gatherings facilitated by trained personnel. They involve presentations (often in local languages such as Hausa), question-and-answer sessions, participatory mapping, and dialogue circles. These events are hosted in community-accessible venues such as town halls, traditional palaces, village squares, or local government secretariats.

Special sessions are often dedicated to vulnerable groups—women, youth, people with disabilities, and ethnic minorities—to ensure their voices are not overshadowed in larger forums.

### Implementation Guidelines

To ensure effectiveness and compliance with Nigerian regulations and international safeguard standards (AfDB OS10, IFC PS1, and IFAD SECAP), public consultations and town hall meetings in the SAPZ project adhere to the following best practices:

Table 7.1: Implementation Guidelines

<b>Guideline</b>	<b>Description</b>
<b>Early and Continuous Engagement</b>	Meetings are held at multiple project stages—planning, implementation, and monitoring.
<b>Inclusiveness and Accessibility</b>	Invitations are extended to all relevant stakeholder groups, ensuring gender balance and language translation.
<b>Local Facilitation and Mediation</b>	Community leaders and trusted intermediaries are engaged to co-host and legitimize the process.
<b>Culturally Appropriate Formats</b>	Events respect local customs, timeframes (e.g., market days or prayer times), and decision-making norms.
<b>Documentation and Feedback Loop</b>	Proceedings are recorded, and a summary of key issues and follow-up actions is shared back with the community.



Guideline	Description
<b>Grievance Redress Linkages</b>	Meetings offer opportunities for registering formal complaints or suggestions to be addressed through the Grievance Redress Mechanism (GRM).

### Outcomes and Benefits

Properly conducted public consultations and town hall meetings yield several tangible and intangible benefits:

- Enhanced project legitimacy and social license to operate.
- Early identification of potential social and environmental risks.
- Improved design of mitigation measures based on local realities.
- Strengthened relationships with host communities and traditional authorities.
- Reduced resistance and delays during project implementation.

### Case Example from SAPZ, Kaduna

During the initial phases of the SAPZ project in Kaduna State, several town hall meetings were organized in host communities such as Kuzuntu, Dutsen-Wai, and Daki-Takwas. These meetings brought together a wide range of stakeholders, including traditional leaders, local government representatives, youth groups, women’s associations, and farmers’ cooperatives. Critical issues raised included land boundaries, compensation modalities, employment opportunities for local youth, and the protection of sacred groves and cultural heritage sites. Feedback from these consultations directly informed the Environmental and Social Management Plan (ESMP) and the Livelihood Restoration Plan (LRP).

Table 7.2: Public Consultations and Town Hall Meetings – Strategy and Institutional Alignment

Engagement Component	Description	Alignment with Institutional Frameworks
<b>Purpose of Engagement</b>	To inform, consult, and involve local communities and stakeholders at various phases of the SAPZ Project lifecycle, fostering transparency, ownership, and conflict mitigation.	<ul style="list-style-type: none"> <li>• <b>AfDB OS10:</b> Ensures ongoing engagement through all project phases.</li> <li>• <b>IFC PS1:</b> Requires free, prior, and informed consultation for projects with adverse impacts.</li> </ul>



Engagement Component	Description	Alignment with Institutional Frameworks
		<ul style="list-style-type: none"> <li>• <b>IFAD SECAP:</b> Promotes participatory and inclusive consultation processes.</li> </ul>
<b>Format &amp; Venues</b>	In-person town halls, public forums, or courtyard meetings held in accessible locations such as traditional palaces, schools, or community centers.	<ul style="list-style-type: none"> <li>• <b>AfDB OS10:</b> Emphasizes culturally appropriate formats.</li> <li>• <b>IFC PS1:</b> Recommends accessible and inclusive engagement methods.</li> </ul>
<b>Language and Cultural Consideration</b>	Meetings are conducted in <b>Hausa</b> and other local dialects, with use of interpreters and visual tools to accommodate illiterate or semi-literate participants.	<ul style="list-style-type: none"> <li>• <b>AfDB OS10:</b> Requires culturally appropriate and meaningful engagement.</li> <li>• <b>IFAD SECAP:</b> Mandates local language and accessibility considerations.</li> </ul>
<b>Stakeholder Inclusivity</b>	Engagement of diverse groups: men, women, youth, traditional leaders, farmers' cooperatives, religious groups, and vulnerable populations (e.g., widows, PWDs).	<ul style="list-style-type: none"> <li>• <b>IFC PS1:</b> Requires engagement of affected and disadvantaged groups.</li> <li>• <b>AfDB OS10:</b> Calls for inclusive stakeholder representation.</li> <li>• <b>IFAD SECAP:</b> Emphasizes gender sensitivity and inclusiveness.</li> </ul>
<b>Engagement Timing</b>	Conducted during feasibility, ESIA, project implementation, and monitoring phases to ensure continued stakeholder input.	<ul style="list-style-type: none"> <li>• <b>AfDB OS10:</b> Stresses the need for engagement throughout the project cycle.</li> <li>• <b>IFC PS1:</b> Calls for ongoing stakeholder engagement.</li> </ul>



Engagement Component	Description	Alignment with Institutional Frameworks
<p><b>Documentation and Follow-up</b></p>	<p>Meeting minutes, attendance sheets, photos, key concerns, and action points are documented and disclosed. Feedback loops are established to show how input was used.</p>	<ul style="list-style-type: none"> <li>• <b>AfDB OS10:</b> Requires tracking and documentation of stakeholder engagement.</li> <li>• <b>IFAD SECAP:</b> Promotes transparent reporting and follow-up.</li> <li>• <b>IFC PS1:</b> Emphasizes disclosure and responsiveness.</li> </ul>
<p><b>Conflict Sensitivity</b></p>	<p>Consultations are used as mechanisms to detect and address grievances early, prevent escalation, and foster dialogue.</p>	<ul style="list-style-type: none"> <li>• <b>IFC PS1:</b> Advocates grievance management.</li> <li>• <b>AfDB OS10:</b> Promotes risk-informed and conflict-sensitive consultation.</li> <li>• <b>IFAD SECAP:</b> Requires assessment of conflict dynamics during consultations.</li> </ul>



## 7.2 Focus Group Discussions (FGDs)

Focus Group Discussions (FGDs) are structured but flexible group interactions conducted to elicit in-depth, qualitative insights from specific subsets of stakeholders within the SAPZ project communities. FGDs are particularly useful for uncovering context-specific concerns, socio-cultural dynamics, and vulnerable group experiences that may not emerge during broader public consultations or town hall meetings.

### Purpose:

The primary purpose of FGDs is to:

- Understand the perceptions, priorities, and experiences of stakeholder subgroups (e.g., women, youth, farmers, traders, artisans, herders).
- Provide a safe and enabling space for open dialogue, particularly for marginalized or less vocal groups.
- Feed rich, qualitative data into the Environmental and Social Impact Assessment (ESIA), Livelihood Restoration Plan (LRP), and Resettlement Action Plan (RAP) processes.
- Facilitate participatory planning, local ownership, and more targeted mitigation measures.

Table 7.3: Target Groups for FGDs:

<b>Group</b>	<b>Rationale</b>
<b>Women (including widows and women-headed households)</b>	To understand gender-specific vulnerabilities, household-level impacts, land access, and livelihood roles.
<b>Youth (male and female)</b>	To explore aspirations, employment concerns, migration issues, and potential for agro-industrial jobs.
<b>Local farmers</b>	To gather insights on land use, cropping cycles, displacement risks, and livelihood dependence.
<b>Herders (where applicable)</b>	To assess conflict risks, grazing patterns, and land pressure issues.
<b>Traditional and Religious Leaders</b>	For cultural legitimacy, social cohesion, and conflict mitigation strategies.
<b>Persons with Disabilities (PWDs)</b>	To ensure accessibility and participation in the project's benefits and planning.



<b>Group</b>	<b>Rationale</b>
<b>Artisans, traders, and cooperatives</b>	To explore informal sector needs, supply chains, and economic integration.

### Format and Methodology:

Table 7.4: component methodology

<b>Group Size</b>	8–12 participants to ensure participation without dominance.
<b>Facilitation</b>	Trained facilitators (preferably gender-matched) lead sessions, supported by a note-taker and local translator/interpreter (if required).
<b>Language</b>	All FGDs are conducted in Hausa and/or the dominant local dialect. Concepts are simplified to accommodate different literacy levels.
<b>Venue</b>	Neutral and accessible community spaces (e.g., town halls, schools, religious compounds). Locations are selected in consultation with the community to ensure cultural appropriateness.
<b>Tools Used</b>	<ul style="list-style-type: none"> <li>• Semi-structured discussion guide</li> <li>• Flip charts / pictorial aids</li> <li>• Voice recorder (with consent) –</li> <li>• Note-taking templates</li> <li>• Consent and confidentiality forms</li> </ul>
<b>Duration</b>	1.5 – 2 hours per session
<b>Timing</b>	Conducted at convenient hours (e.g., early morning or late afternoon) to maximize attendance and minimize disruption to livelihoods.

### Topics Covered in FGDs (Depending on Group Type):

- Perceived benefits and risks of the SAPZ Project
- Land acquisition and usage patterns
- Livelihood dependence and seasonal vulnerabilities
- Cultural and spiritual attachment to land or water bodies



- Employment expectations and capacity building needs
- Grievance redressal mechanisms
- Gender-specific roles, challenges, and opportunities
- Conflict dynamics and early warning systems

**Ethical and Conflict-Sensitive Considerations:**

- **Voluntary Participation:** All FGDs are based on informed consent; participants are free to withdraw at any time.
- **Confidentiality:** Personal identifiers are removed from notes and reports to protect participants.
- **Do No Harm:** Care is taken to avoid discussions that may provoke tension or trauma, especially in conflict-sensitive settings.

**Conflict Sensitivity:** FGDs are used to detect emerging grievances, power asymmetries, or inter-group tensions that could undermine project outcomes.

Table 7.5: Institutional Alignment

Framework	Alignment with FGDs
<b>AfDB Operational Safeguard 10</b>	Requires meaningful consultation that is culturally appropriate and inclusive; FGDs support this by engaging marginalized and interest groups.
<b>IFC Performance Standard 1</b>	Encourages ongoing stakeholder engagement, particularly with affected and disadvantaged groups; FGDs enable deeper dialogue and feedback loops.
<b>IFAD SECAP Guidelines</b>	Promotes participatory rural appraisal techniques and inclusive planning; FGDs facilitate this by capturing lived experiences and enabling co-design of solutions.

**Outputs of FGDs:**

- Transcribed and translated discussion notes
- Thematic summaries highlighting group-specific concerns, risks, and opportunities
- Recommendations for project design improvements, resettlement strategies, and capacity building interventions
- Documentation for ESIA, RAP, and LRP reports



### 7.3 Key Informant Interviews (KIIs)

**Key Informant Interviews (KIIs)** are one-on-one, in-depth interviews conducted with individuals who possess specialized knowledge, influence, or firsthand experience relevant to the SAPZ project. These individuals are typically senior stakeholders, experts, or community representatives who can provide nuanced insights into the social, economic, cultural, or institutional dynamics that may affect the project's implementation and impact.

In the context of the SAPZ Project in Kaduna State, KIIs serve as a crucial qualitative data-gathering method to understand stakeholders' perspectives, identify context-specific risks and opportunities, and validate findings from broader stakeholder consultations. The process supports strategic decision-making by uncovering hidden concerns, power structures, stakeholder expectations, and community dynamics that may not surface in group settings.

#### **Objectives of KIIs in the SAPZ Context:**

- To gather expert opinions from regulators, traditional leaders, religious heads, and local government officials.
- To identify socio-political or institutional barriers that could affect project implementation.
- To validate or supplement data collected from community meetings, FGDs, or surveys.
- To assess stakeholder perceptions of environmental and social risks.
- To explore culturally appropriate grievance redress and benefit-sharing mechanisms.

#### **Typical Participants for KIIs:**

- Representatives from Federal Ministry of Environment (FMEnv) and Kaduna State Environmental Protection Authority (KEPA).
- Local government chairpersons and planning officers.
- Community heads, ward leaders, and religious leaders.
- Women's association leaders and youth group representatives.
- Representatives of NGOs, civil society organizations, and farmer cooperatives.
- Technical officers from line ministries (e.g., Agriculture, Water Resources, Lands).

#### **Key Characteristics of KIIs:**

- Conducted in a private, confidential setting to ensure candidness.
- Semi-structured interview format guided by open-ended questions.
- Interview guides tailored to each informant's role and expertise.
- Audio recordings or detailed notes are used (with consent) to ensure accuracy.



- Results analyzed thematically to extract actionable insights.

### Alignment with Stakeholder Engagement Frameworks:

KIIs align with international best practices such as:

- **AfDB’s Integrated Safeguards System (ISS):** Emphasizes stakeholder dialogue and expert consultation during ESIA and project planning.
- **IFC Performance Standard 1:** Recommends consultations with knowledgeable stakeholders throughout the project cycle.
- **Nigerian EIA Procedural Guidelines (FMEnv):** Advocates for expert interviews as part of socio-environmental assessments.

Table 7.6: Summary of KII Process for SAPZ Project

Component	Description
<b>Purpose</b>	Obtain detailed perspectives from expert or influential individuals
<b>Interview Format</b>	Semi-structured, in-person or virtual one-on-one interviews
<b>Tools Used</b>	Interview guide, audio recorder, consent forms, thematic analysis template
<b>Key Informants</b>	Regulators, traditional rulers, women/youth leaders, NGO representatives
<b>Languages</b>	English, Hausa, or local dialects, depending on informant preference
<b>Timing</b>	Conducted during project scoping, ESIA, implementation review, and monitoring
<b>Ethical Considerations</b>	Informed consent, anonymity (where requested), cultural sensitivity
<b>Expected Outcome</b>	In-depth understanding of risks, opportunities, stakeholder expectations

### 7.4 Community Mapping and Participatory Rural Appraisal (PRA) Tools

Community Mapping and Participatory Rural Appraisal (PRA) tools are critical participatory methodologies used to actively involve local stakeholders—particularly rural and vulnerable groups—in identifying, analyzing, and articulating issues that affect their environment, livelihoods, and relationship with the proposed project. These methods empower community mem-



bers to visualize and document their spatial, socio-economic, and environmental realities, ensuring their voices and indigenous knowledge are reflected in project planning and mitigation strategies.

Within the context of the SAPZ Project in Kaduna State—particularly in the host communities of Dutsen-Wai–Kuzuntu (Kubau LGA) and Daki-Takwas (Chikun LGA)—these tools play a central role in understanding community structure, resource use patterns, social networks, vulnerability hotspots, and culturally significant sites. This is particularly crucial for gaining trust, promoting transparency, and building social license to operate.

### Objectives of Community Mapping and PRA Tools

- To identify and locate key community assets, land uses, sacred sites, water sources, and environmental features.
- To highlight areas of potential project impact (e.g., areas at risk of displacement, pollution, or resource conflict).
- To understand community livelihoods, resource access, and vulnerability to shocks.
- To involve community members—especially women, youth, elders, and marginalized groups—in co-producing knowledge.
- To support conflict-sensitive planning by identifying disputed boundaries or communal land claims.

Table 7.7: Key PRA Tools and Their Application in the SAPZ Project:

Tool	Purpose	Expected Outputs
<b>Community Resource Maps</b>	To illustrate physical features of the village (e.g., roads, farmland, rivers, schools, shrines).	Hand-drawn maps identifying key infrastructure, land use, and natural resources.
<b>Social Mapping</b>	To identify social groupings, power structures, settlement patterns, and vulnerable households.	Maps showing community layout and locations of households by social categories.
<b>Seasonal Calendars</b>	To identify seasonal trends in agriculture, income, diseases, water availability, etc.	Charts depicting seasonal cycles of livelihood and vulnerabilities.
<b>Transect Walks</b>	Physical walks through the community to observe land use, resources, and community conditions.	Field notes, sketches, and observations used to ground-truth community claims.



Tool	Purpose	Expected Outputs
<b>Venn Diagrams</b>	To analyze local institutions, leadership structures, and their influence or relationship to others.	Diagrams showing key actors (e.g., chiefs, DFOs, NGOs) and their perceived importance.
<b>Problem Ranking</b>	To allow communities to identify and prioritize challenges they face (e.g., access to water, land).	List of prioritized community concerns to inform mitigation planning.

### Process and Stakeholder Involvement

- **Facilitation:** Skilled local facilitators fluent in Hausa or local dialects are used to guide participatory sessions respectfully and inclusively.
- **Participants:** Inclusive of elders, women, youths, farmers, herders, and other vulnerable groups.
- **Tools Used:** Flipcharts, markers, stones, leaves, and other locally available materials to allow low-literacy participation.
- **Setting:** Conducted in a safe, accessible, and culturally appropriate venue (e.g., community square or palace compound).
- **Ethical Considerations:** Prior informed consent, gender-sensitive facilitation, and transparency in how information will be used.

### Benefits of Community Mapping and PRA Tools in the SAPZ Project

- Encourages ownership and inclusion, ensuring community inputs are considered in decision-making.
- Facilitates risk screening and conflict avoidance by identifying culturally or environmentally sensitive zones.
- Enhances the effectiveness of the ESIA, RAP, and LRP processes by grounding technical assessments in community realities.
- Builds trust and social cohesion, particularly in areas with history of mistrust or marginalization.
- Supports monitoring and evaluation by establishing baseline data that can be tracked over time.

### Integration with Other Engagement Tools

Community mapping and PRA results should be triangulated with:



- Key Informant Interviews (KIIs) for expert insights;
- Focus Group Discussions (FGDs) for group-level validation;
- Household Surveys for quantitative verification;
- Remote sensing or GIS data, where applicable, for spatial analysis and planning.

Table 7.8: Sample Output: Community Map from Kuzuntu -Dutsen-Wai and Taki Dakwas

<b>Feature</b>	<b>Description</b>
Sacred Grove (Hurumi)	Avoidance zone, culturally restricted, no development allowed
Community well/Borehole	Only potable water source; highly vulnerable to pollution
Youth Farmland Area	Seasonal farming by youth cooperatives; major livelihood source
Grazing Route	Critical pathway used by nomadic herders during dry season
Disputed Land Boundary	Historically contested; mediation advised before land acquisition



## CHAPTER EIGHT- STAKEHOLDER ENGAGEMENT SCHEDULE

The Stakeholder Engagement Schedule outlines the planned and systematic process for engaging various stakeholders throughout the lifecycle of the SAPZ project in Kaduna State. Effective stakeholder engagement is not a one-off activity but a continuous process that must

be deliberately structured across different phases of project development—including project preparation, design, implementation, monitoring, and decommissioning (if applicable).

This schedule serves as a roadmap to ensure that engagement activities are timely, inclusive, and tailored to the needs and influence levels of different stakeholder groups. It also reflects the dynamic nature of stakeholder relationships, recognizing that their interests, levels of influence, and engagement needs may evolve over time.

The objective of the Stakeholder Engagement Schedule is to:

- Promote transparency and accountability in project operations.
- Ensure continuous feedback from stakeholders to inform decision-making.
- Fulfill compliance requirements under national (FMEnv, KEPA) and international standards (AfDB's Integrated Safeguards System, OS1 and OS10, IFC PS1).
- Mitigate risks and enhance social acceptance, thereby securing the social license to operate.
- Strengthen ownership and sustainability of project outcomes by embedding stakeholder perspectives into design and implementation.

The schedule categorizes stakeholders based on their relevance at specific project stages and identifies appropriate methods, tools, timelines, and responsible institutions for engagement. It also prioritizes the inclusion of vulnerable and marginalized groups—such as women, youth, elderly, and persons with disabilities—ensuring that their concerns are captured and responded to effectively.

In aligning with the African Development Bank's guidelines and national regulatory expectations, the engagement schedule is a vital component of the broader Stakeholder Engagement Plan (SEP), designed to maintain meaningful, culturally appropriate, and responsive relationships between the project team and the communities it serves.

### 8.1 Timeline by Project Phase (Planning, Construction, Operation)

The Stakeholder Engagement Schedule for the SAPZ project in Kuzuntu–Dutsen-Wai (Kubau LGA) and Daki-Takwas (Chikun LGA) is designed to be phased, dynamic, and responsive to the evolving nature of project activities across its three key lifecycle phases: Planning, Construction, and Operation. This ensures that engagement remains continuous, context-specific, and aligned with both AfDB's Integrated Safeguard System (ISS) and Nigerian environmental and social regulations (FMEnv and KEPA).



Each phase has specific engagement objectives, stakeholders, and activities that are tailored to the level of project impact, stakeholder concerns, and information needs at that time.

### **1. Planning Phase (Completed / Ongoing)**

This phase includes feasibility studies, site selection, environmental and social assessments (ESIA, RAP, LRP, SEP), and initial community mobilization. The main objective was to inform, consult, and build trust with key stakeholders, laying the foundation for future phases.

#### **Key Engagement Activities:**

- Introductory meetings with traditional authorities and LGAs (Kuzuntu, Dutsen-Wai, Daki-Takwas)
- Mapping of key stakeholders including farmers, women's groups, youth associations, and vulnerable populations
- Public disclosure of the ESIA ToR and scoping reports
- Community entry and sensitization
- Focus Group Discussions (FGDs) and Key Informant Interviews (KIIs)
- Town hall meetings with community members
- Consultations with Divisional Forest Officers and local CSOs

**Engagement Frequency:** Continuous during 2024

#### **Outcome:**

- Identification of environmental and social risks
- Gathering baseline data for RAP and LRP
- Establishment of community liaison structures
- Preliminary agreements and disclosure of project intent

### **2. Construction Phase (Planned for 2025–2026)**

This is the **most sensitive phase** in terms of physical and social impacts, including land acquisition, civil works, movement of equipment, and temporary disruption to livelihoods and environmental settings.

#### **Key Engagement Objectives:**

- Ensure transparency in compensation, resettlement, and livelihood restoration processes
- Address community grievances promptly
- Maintain open communication with local authorities, land users, and host communities



- Manage expectations and rumours through regular information dissemination

#### **Key Engagement Activities:**

- Regular community updates on construction schedules and milestones
- Targeted engagement with Project-Affected Persons (PAPs), including compensation verification
- Establishment of a Grievance Redress Mechanism (GRM) functional at both sites
- Coordination meetings with LGAs, state-level MDAs (Kaduna Investment Promotion Agency, Ministry of Agriculture, KEPA)
- Contractor-community induction and codes of conduct orientation
- Safety briefings and job opportunity announcements, especially targeting local youths
- Livelihood Restoration Plan (LRP) implementation check-ins

#### **Engagement Frequency:**

- Bi-weekly during active construction
- Monthly progress review meetings with communities

#### **Expected Outcomes:**

- Smooth resettlement process
- Early identification and resolution of grievances
- Local employment maximized, especially among youth and vulnerable groups
- Strengthened social license to operate

### **3. Operation Phase (2026 and beyond)**

This phase begins once the Agro-Industrial Hub (AIH) and Agricultural Transformation Center (ATC) become fully functional. Engagement shifts toward performance monitoring, accountability, local participation in benefits, and sustainability.

#### **Key Engagement Objectives:**

- Foster participatory governance around resource use, service delivery, and employment
- Encourage participation of local SMEs, cooperatives, and agribusinesses in value chains
- Monitor social and environmental commitments (e.g., water use, emissions, noise, employment equity)
- Create feedback loops with the community for continuous improvement



**Key Engagement Activities:**

- Periodic community scorecards and satisfaction surveys
- Quarterly stakeholder review forums to discuss benefits and challenges
- Farmer field schools and extension programs to train and empower local producers
- Employment equity monitoring with disaggregated reporting (by gender, youth, disability)
- Partnering with local cooperatives for produce aggregation, processing, and market linkages

**Engagement Frequency:**

- Quarterly engagement for review and performance dialogue
- Annual public consultations on environmental and social performance (aligned with ESMP commitments)



### Expected Outcomes:

- Inclusive participation in SAPZ-driven agri-value chains
- Long-term partnerships with community institutions
- Continued compliance with safeguards and community expectations
- Enhanced trust and local economic development

Table 8.1: Stakeholder Engagement Schedule

Project Phase	Stakeholder Group	Category	Interest/Influence	Engagement Objectives	Engagement Tools/Methods	Frequency	Responsible Parties	Annual Cost Estimate (₦)
<b>Plan-ning Phase</b>	Traditional Rulers & Community Leaders (Kuzuntu, Dutsen-Wai, Daki-Takwas)	Primary	High influence, high interest	Secure FPIC, build trust, identify land/farm-related concerns	Town halls, KIIs, community mapping	Quarterly	Kaduna SAPZ PIU (lead), ESIA Consultants, LG Desk Officers	5,000,000
	Host Communities (men, women, farmers, herders)	Primary	High interest, medium influence	Capture concerns, promote ownership, prevent exclusion	FGDs, participatory rural appraisal (PRA)	Quarterly	Kaduna SAPZ PIU, Social Safeguards Officer	4,500,000



Stakeholders Engagement Plan (SEP) for the Proposed Kaduna SAPZ Project (AIH and ATC)

Project Phase	Stakeholder Group	Category	Interest/Influence	Engagement Objectives	Engagement Tools/Methods	Frequency	Responsible Parties	Annual Cost Estimate (₦)
	Women's Groups, Youth Associations, Farmer Cooperatives	Primary	High interest, medium influence	Ensure inclusion of vulnerable groups, integrate priorities into design	Targeted FGDs, household surveys	Quarterly	Kaduna SAPZ PIU, Gender Specialist	4,000,000
	Project Affected Persons (PAPs)	Primary	Very high interest, low influence	Document losses, agree on resettlement/livelihood restoration	One-on-one consultations, disclosure sessions	Bi-annually	Kaduna SAPZ PIU, RAP Consultant	6,500,000
	Kaduna State Government (MoA, KEPA, KADIPA, Min. of Env.)	Secondary	High influence, high interest	Align SAPZ with state policy, land use planning, safeguards	Policy dialogues, MoUs, workshops	Quarterly	Kaduna SAPZ PIU, State Focal Desk	3,500,000
	Federal Ministries (FMARD, FMEnv)	Secondary	High influence, medium interest	Compliance with national policies/regulations	Technical meetings, document reviews	Bi-annually	Kaduna SAPZ PIU, Regulatory Lead	2,500,000
	AfDB, NPCU, IFAD/FAO/World Bank (partners)	Secondary/Tertiary	High influence, high interest	Safeguards compliance, donor coordination	Joint review missions, reporting	Bi-annually	Kaduna SAPZ PIU	3,000,000



Project Phase	Stakeholder Group	Category	Interest/Influence	Engagement Objectives	Engagement Tools/Methods	Frequency	Responsible Parties	Annual Cost Estimate (₦)
	NGOs/CSOs (environmental, land rights, livelihoods)	Secondary	Medium influence, medium interest	Transparency, integrate local expertise	Stakeholder workshops, advocacy dialogues	Bi-annually	Kaduna SAPZ PIU, NGO Liaison	2,000,000
<b>Construction Phase</b>	Local Community Members (workers, artisans, youth)	Primary	High interest, medium influence	Share information on construction, job opportunities, grievance handling	FGDs, notice boards, community radio	Quarterly	Kaduna SAPZ PIU (lead), Contractor CLOs	6,000,000
	PAPs & Host Farmers	Primary	Very high interest, low influence	Monitor compensation, prevent elite capture	Disclosure meetings, grievance redress	Quarterly	Kaduna SAPZ PIU, RAP Monitoring Team	5,000,000
	Contractors & Subcontractors	Secondary	Medium interest, high influence	Reinforce HSE, manage workforce expectations	Toolbox meetings, inductions	Monthly	Kaduna SAPZ PIU, HSE Officers	4,500,000
	Environmental & Social Regulators (KEPA, FMEEnv)	Secondary	Medium interest, high influence	Ensure ESMP compliance	Site visits, joint monitoring	Bi-annually	Kaduna SAPZ PIU, E&S Compliance Team	2,500,000



Project Phase	Stakeholder Group	Category	Interest/Influence	Engagement Objectives	Engagement Tools/Methods	Frequency	Responsible Parties	Annual Cost Estimate (₦)
<b>Operational Phase</b>	Farmer Cooperatives, SMEs, Women's Associations	Primary	High interest, medium influence	Integrate in value chains, support service delivery	Business clinics, capacity building	Bi-annually	Kaduna SAPZ PIU, Agribusiness Unit	6,500,000
	Local Government Authorities (Kubau, Chikun)	Secondary	Medium influence, high interest	Align SAPZ with LGA dev. plans, co-manage grievances	Joint review forums	Bi-annually	Kaduna SAPZ PIU, LGA Desk Officers	2,500,000
	Host Communities	Primary	High interest, medium influence	Build trust, share benefits, monitor outcomes	Community scorecards, feedback forums	Annually	Kaduna SAPZ PIU, Social Safeguards Officer	5,000,000
	Media (Radio, TV, Print)	Tertiary	Medium influence, medium interest	Disseminate SAPZ updates, enhance transparency	Press briefings, newsletters	Bi-annually	Kaduna SAPZ PIU, Communications Officer	3,000,000
	Security Agencies (Police, Civil Defence, VGN)	Secondary	Medium influence, medium interest	Maintain project security, protect assets	Coordination meetings, briefings	Bi-annually	Kaduna SAPZ PIU, Security Focal Point	2,000,000



## 8.2 Frequency and Methods of Engagement

The SAPZ project is a high-impact, community-sensitive initiative with multi-stakeholder dimensions involving local communities, traditional institutions, government agencies, development partners, private investors, and civil society. As such, the frequency and methods of engagement are structured in alignment with the AfDB Operational Safeguard 10, IFC Performance Standard 1, and Nigerian regulatory frameworks to ensure meaningful, consistent, and culturally appropriate stakeholder participation throughout the project lifecycle.

Table 8.2: Engagement Frequency by Project Phase

Phase	Engagement Frequency	Rationale
<b>Planning Phase</b>	Monthly to Quarterly	Frequent engagements are needed to build trust, collect baseline data, communicate project objectives, and ensure Free, Prior, and Informed Consent (FPIC), especially from vulnerable groups and traditional leaders.
<b>Construction Phase</b>	Weekly to Monthly	Regular communication is crucial to inform the community of ongoing activities, address grievances, mitigate disruption, and ensure HSE compliance through community liaison meetings, notice boards, and on-site updates.
<b>Operational Phase</b>	Quarterly to Bi-Annually	Engagements focus on monitoring community development outcomes, value chain integration, sustainability, and benefit-sharing with stakeholder groups (e.g., farmer cooperatives, women's associations, SMEs).
<b>Decommissioning (if applicable)</b>	As required	Engagements will be held prior to and during decommissioning to manage expectations, ensure environmental restoration, and provide closure support where necessary.

## 2. Methods of Stakeholder Engagement

The methods of engagement are designed to be participatory, inclusive, and adapted to the socio-cultural dynamics of the host communities in Kubau and Chikun LGAs. Both traditional and modern tools are employed, considering varying literacy levels, power structures, and access to information.

### A. Community-Level Engagement Tools



Method	Description	Applicability
<b>Town Hall Meetings</b>	Large gatherings facilitated by traditional rulers and project staff to explain project components, solicit feedback, and make public commitments.	Best for initial consultations, disclosure, and updates to all community groups.
<b>Focus Group Discussions (FGDs)</b>	Small, segmented discussions with women, youths, farmers, or vulnerable groups to understand specific concerns and mitigate exclusion.	Effective for gender and social inclusion, livelihood planning, and impact monitoring.
<b>Key Informant Interviews (KIIs)</b>	One-on-one discussions with stakeholders such as village heads, religious leaders, LGA officials, and cooperative leaders.	Used for in-depth understanding of context, power dynamics, and elite perspectives.
<b>Participatory Rural Appraisal (PRA) Tools</b>	Mapping, ranking, timelines, and seasonal calendars used to understand community needs and patterns.	Used during baseline studies, needs assessment, and vulnerability analysis.
<b>Community Radio Broadcasts</b>	Regular updates in Hausa through trusted radio stations.	Ideal for disseminating construction schedules, safety messages, and grievance mechanisms.

## B. Institutional Engagement Tools

Method	Description	Applicability
<b>Technical Briefings and Roundtables</b>	Sessions with MDAs (FMARD, FMEnv, KEPA), AfDB, and LGA officials to review technical and policy alignment.	Ensures policy coherence, environmental compliance, and donor coordination.
<b>Stakeholder Workshops</b>	Structured gatherings with CSOs, NGOs, cooperatives, and the private sector.	Good for capacity-building, partnership facilitation, and knowledge sharing.
<b>Formal Correspondence &amp; Reporting</b>	Letters, memos, and reports shared regularly with government institutions and financiers.	Used for documentation, formal submissions, and regulatory updates.



Method	Description	Applicability
<b>Grievance Redress Mechanism (GRM)</b>	A multi-tier system including suggestion boxes, toll-free numbers, and community grievance desks.	Critical for managing conflict, resolving complaints, and tracking feedback.
<b>Monitoring Visits &amp; Inspections</b>	Joint site visits with regulatory agencies and community reps.	Ensures transparency in implementation and safeguards compliance.

### 3. Engagement Approach and Adaptability

- **Culturally Sensitive:** Engagements will be conducted in Hausa and in accordance with traditional protocols (e.g., palace-based consultations with the district heads in Kuzuntu and Daki-Takwas).
- **Gender-Responsive:** Women-only FGDs, inclusion of women representatives in leadership engagements, and female interpreters will be used where needed.
- **Youth Engagement:** Special forums will target youth groups and artisans to discuss employment, entrepreneurship, and vocational training opportunities within the SAPZ.
- **Digital Tools:** Where appropriate, digital platforms such as WhatsApp broadcasts and SMS alerts may be deployed for updates and emergency information dissemination.

The frequency and methods of engagement for the SAPZ project in Kuzuntu–Dutsen-Wai and Daki-Takwas are designed to promote informed participation, build ownership, ensure social accountability, and mitigate conflict. This robust engagement framework will be dynamically reviewed and updated as the project progresses, in line with evolving community needs and project realities.



## CHAPTER NINE - INFORMATION DISCLOSURE STRATEGY

Information disclosure is a cornerstone of transparent, inclusive, and participatory project implementation. In the context of the Special Agro-Industrial Processing Zone (SAPZ) project in Kaduna State—specifically the Agricultural Transformation Center (ATC) in Kuzuntu–Dutsen-Wai, Kubau LGA, and the Agro-Industrial Hub (AIH) in Daki-Takwas, Chikun LGA—this strategy is essential to ensure that all stakeholders are timely and adequately informed about project activities, impacts, benefits, and mitigation measures.

The Information Disclosure Strategy outlines the mechanisms, platforms, languages, formats, and timelines through which relevant project-related information will be shared with stakeholders. It ensures compliance with the African Development Bank's (AfDB) Integrated Safeguards System (ISS), particularly Operational Safeguard 1 (OS1) on Environmental and Social Assessment and OS10 on Stakeholder Engagement and Information Disclosure. Additionally, it aligns with Nigeria's national regulatory framework under the Federal Ministry of Environment (FMEnv) and the Kaduna State Environmental Protection Authority (KEPA).

This strategy promotes free, prior, and informed consultation (FPIC), upholding the rights of affected people—especially vulnerable groups, women, and youth—to understand, question, and influence decisions that may affect their lives, livelihoods, and environment. It also addresses community grievances by fostering an environment of trust, accountability, and two-way communication.

Given the diverse socio-cultural landscape of the project areas, the strategy prioritizes accessibility, linguistic inclusion (e.g., Hausa translations), gender sensitivity, and technological flexibility to reach different stakeholder categories, from traditional leaders and regulatory agencies to rural farmers, traders, and youth groups.

Overall, the Information Disclosure Strategy is designed not only to meet compliance requirements but also to enhance stakeholder confidence, minimize resistance or misinformation, and foster sustained cooperation throughout the project lifecycle—from planning and construction to operation and decommissioning.

### 9.1 Communication Channels and Languages

Effective communication is fundamental to the success of any stakeholder engagement process, especially within large-scale development initiatives such as the Special Agro-Industrial Processing Zones (SAPZ) project. Given the project's geographical spread across the rural communities of Kuzuntu–Dutsen-Wai in Kubau LGA and Daki-Takwas in Chikun LGA, where varying literacy levels, cultural contexts, and language proficiencies exist, a multi-layered and inclusive communication strategy is required.

This section outlines the communication channels and languages that will be used to ensure inclusive, participatory, culturally appropriate, and accessible stakeholder engagement across all project phases—planning, construction, operation, and decommissioning.



## 1. Communication Channels

A mix of formal and informal, modern and traditional, digital and face-to-face communication channels will be utilized to reach all stakeholder groups effectively. These include:

Table 9.1: Communication Channels

Channel	Description	Target Audience	Strengths
Community Meetings/Town Halls	In-person, open forums held in villages and wards	Local residents, traditional leaders, women, youth, vulnerable groups	Culturally familiar, allows two-way communication, builds trust
Focus Group Discussions (FGDs)	Small group discussions with specific stakeholder subsets (e.g., women, youth, herders)	Marginalized or vulnerable groups	Targeted engagement, encourages open dialogue
<b>Key Informant Interviews (KIIs)</b>	One-on-one interactions with influential or informed individuals	Religious leaders, LGA officials, traditional authorities	Deep insights, strategic feedback
<b>Mobile Public Address (PA) Systems</b>	Loudspeaker announcements mounted on vehicles	Remote or low-literacy communities	Broad reach, effective for urgent updates or reminders
<b>Radio Broadcasts (Local FM Stations)</b>	Weekly or bi-weekly programs in local languages	Rural population, farmers, traders	Wide coverage, suitable for areas with low internet or electricity access
<b>Posters &amp; Flyers</b>	Visual information displayed in public spaces	General community, market-goers	Easy to disseminate, cost-effective



Channel	Description	Target Audience	Strengths
<b>Community Notice Boards</b>	Installed at village centers, schools, mosques and churches	Residents of the immediate area	Localized and constant access to project information
<b>SMS and Mobile Messaging Apps (e.g., WhatsApp)</b>	Digital alerts and updates	Youth, educated population, local government staff	Real-time communication, accessible to mobile phone users
<b>Project Grievance Redress Boxes &amp; Help Desks</b>	Installed at strategic locations in both LGAs	Affected persons, farmers, workers	Promotes transparency, direct access to feedback mechanisms

## 9.2. Languages for Communication

To ensure clarity, accessibility, and inclusivity, communication will be delivered in the dominant and widely spoken languages of the project-affected communities:

Table 9.2: Languages for Communication

Language	Usage Context	Justification
<b>Hausa</b>	Main language for oral communication in town halls, FGDs, and radio broadcasts	Predominant local language in both Chikun and Kubau LGAs; ensures wide reach among rural populations
<b>English</b>	Official reports, regulatory communications, formal presentations	Language of government and regulatory institutions, NGOs, and AfDB



Language	Usage Context	Justification
<b>Pidgin English</b>	Informal interactions, radio programs for broader reach	Useful for urban/rural fringe communities and traders with mixed language exposure
<b>Other Languages (if needed such as Fulani, gbagi)</b>	On request during specific FGDs or KIIs	Respect for cultural diversity and inclusion of smaller ethnic groups

In addition, visual aids, pictograms, and infographics will be used in all printed materials to support understanding among low-literacy populations.

### 3. Accessibility and Inclusion Considerations

- **Gender-Sensitive Communication:** Separate sessions for women and female-headed households where needed to allow safe space for expression.
- **Youth-Friendly Platforms:** Use of social media and community influencers to reach younger demographics.
- **Elderly-Friendly Approaches:** In-person discussions, using familiar language and traditional leadership structures.



- **Disability-Inclusive Measures:** Adjusted communication modes for persons with hearing or visual impairments during key engagements.

#### **4. Monitoring and Feedback**

Regular assessments will be conducted to evaluate the effectiveness of each channel and language, ensuring continual adaptation to community preferences and feedback. A stakeholder feedback logbook will be maintained at community liaison offices to record observations on communication effectiveness and areas for improvement.

By deploying a multi-channel, multilingual approach, the SAPZ project in Kaduna State aims to foster equity, participation, and mutual understanding throughout the lifecycle of the project, ensuring that no stakeholder is left behind.

#### **Accessibility and Cultural Appropriateness**

Ensuring accessibility and cultural appropriateness in stakeholder engagement is critical to the success and sustainability of the SAPZ Project in Kaduna State. The project spans across diverse communities in Kubau LGA (Kuzuntu–Dutsen-Wai) and Chikun LGA (Daki-Takwas), each with unique cultural norms, traditional leadership structures, languages, and communication preferences. A one-size-fits-all approach to engagement may marginalize key voices, particularly those of women, youth, the elderly, persons with disabilities, and minority ethnic groups.

To this end, the project adopts an inclusive, culturally sensitive engagement model that guarantees all stakeholders have equal opportunities to participate meaningfully in the decision-making process. The engagement strategies will be guided by a respect for local customs and practices, and delivered through channels that account for literacy levels, religious contexts, gender roles, and local power dynamics.

Key principles underpinning this approach include:

##### **1. Language Inclusivity**

- Communication materials and messages will be translated into Hausa (the predominant local language), and where necessary, interpreted into Fulfulde or Gwari, depending on the minority groups present in the localities.
- For communities with low literacy levels, oral communication methods such as storytelling, songs, radio jingles, and local drama groups will be employed to disseminate key messages.

##### **2. Culturally Sensitive Engagement**

- All meetings and consultations will respect cultural and religious calendars, including prayer times, market days, harvest seasons, and festivals.



- Community engagement sessions will be held in traditional meeting spaces, such as palaces, village squares, or mosques, as agreed upon by community leaders.
- Separate engagement sessions may be organized for women, youth, and persons with disabilities, acknowledging cultural norms that may hinder free expression in mixed-gender or hierarchical settings.

### **3. Physical Accessibility**

- Venues for stakeholder meetings and public consultations will be easily accessible by foot or common means of transportation and will be made physically accessible for persons with disabilities.
- Meeting materials, where printed, will use large fonts and simple graphics to aid understanding, and accommodations such as sign language interpreters will be provided if required.

### **4. Respect for Traditional Authority and Structures**

- Engagement will always be preceded by proper traditional protocol, including securing the blessing of traditional rulers (e.g., Village Heads, District Heads, Ward Chiefs).
- The use of community liaison officers or respected local influencers will be leveraged to bridge cultural gaps and ensure consistent, respectful interaction with the host communities.

### **5. Gender Sensitivity**

- The project will work in alignment with AfDB's Gender Strategy (2021–2025) and Nigeria's National Gender Policy to promote gender equity in participation, access to information, and decision-making.
- Women's cooperatives, female-headed households, and other vulnerable women's groups will be directly engaged through dedicated consultation sessions, and feedback from these sessions will be documented and incorporated into project planning and implementation.

### **6. Feedback and Redress Channels**

Feedback mechanisms (e.g., hotlines, feedback boxes, and verbal reporting via community leaders) will be established and tailored to suit the local literacy levels and communication culture of the host communities.



Table 9.3: Accessibility and Cultural Appropriateness Strategy by Project Phase and Institutional Alignment

Project Phase	Accessibility Strategy	Cultural Appropriateness Measures	Communication Mediums	Alignment with AfDB/ FMEnv Frameworks	Target Stakeholder Groups	Responsible Parties
<b>Plan-ning</b>	<ul style="list-style-type: none"> <li>Use of public, easily accessible venues for meetings (e.g. local halls, schools).</li> <li>Consideration of mobility for elderly, women, and persons with disabilities.</li> <li>Transportation support for remote community members.</li> </ul>	<ul style="list-style-type: none"> <li>Consultation timing adapted to local farming, prayer, and market schedules.</li> <li>Engagement of local leaders, emirs, and village heads in the planning process.</li> <li>Segregated FGDs for women/youth for privacy and openness.</li> </ul>	Town halls, translated materials (Hausa, English), community radio, visual posters.	<ul style="list-style-type: none"> <li>AfDB OS1: Environmental &amp; Social Assessment (stakeholder engagement, FPIC).</li> <li>FMEnv EIA Act: public involvement and culturally relevant disclosure.</li> </ul>	Traditional rulers, women's cooperatives, youth groups, religious leaders, community-based organizations.	ESIA consultants, State SAPZ PIU, Community Liaison Officers (CLOs)
<b>Con-struction</b>	<ul style="list-style-type: none"> <li>Daily site signage in local language.</li> <li>Temporary info booths at key locations.</li> </ul>	<ul style="list-style-type: none"> <li>Feedback mechanisms respecting local norms (anonymous boxes, elders' council).</li> </ul>	Mobile loudspeakers, community bulletin boards, Hausa-translated grievance forms.	<ul style="list-style-type: none"> <li>AfDB OS10: Disclosure in forms understandable to stakeholders.</li> </ul>	Construction workers, informal vendors, host communities, smallholder farmers.	Contractor, Environmental & Social Officer, Local Government Liaison, CLOs



Project Phase	Accessibility Strategy	Cultural Appropriateness Measures	Communication Mediums	Alignment with AfDB/ FMEnv Frameworks	Target Stakeholder Groups	Responsible Parties
	<ul style="list-style-type: none"> <li>Visual aids for illiterate participants.</li> </ul>	<ul style="list-style-type: none"> <li>Consider local taboos, holidays, and religious sensitivities.</li> <li>Employ local interpreters.</li> </ul>		<ul style="list-style-type: none"> <li>FMEnv EIA Guidelines: culturally appropriate communication.</li> </ul>		
<b>Operation</b>	<ul style="list-style-type: none"> <li>Grievance redress centers with gender sensitive access points.</li> <li>Monthly check-in meetings in public spaces.</li> <li>Inclusive monitoring platforms.</li> </ul>	<ul style="list-style-type: none"> <li>Local attire and customs respected in official interactions.</li> <li>Events scheduled to avoid clash with farming or religious obligations.</li> <li>Special outreach to vulnerable households.</li> </ul>	Bi-monthly radio updates, SMS alerts in Hausa, flyers via religious/community centers.	<ul style="list-style-type: none"> <li>AfDB OS2: Labor and Working Conditions (non-discrimination and inclusivity).</li> <li>FMEnv Monitoring: Continuous communication throughout project life.</li> </ul>	Factory workers, cooperative societies, local businesses, LG officials, women's/youth groups.	SAPZ Operator, Monitoring Unit, Grievance Redress Committee (GRC), CLOs



## CHAPTER TEN-GRIEVANCE REDRESS MECHANISM (GRM)

An effective Grievance Redress Mechanism (GRM) is a cornerstone of inclusive and sustainable project implementation. For the Special Agro-Industrial Processing Zone (SAPZ) Project in Kaduna State—specifically the Agricultural Transformation Center (ATC) in Kuzuntu–Dutsen-Wai, Kubau LGA, and the Agro-Industrial Hub (AIH) in Daki-Takwas, Chikun LGA—the GRM serves as a structured and responsive system that allows individuals, households, and communities who believe they are adversely affected by the project to express concerns, lodge complaints, or seek clarification, and receive timely, fair, and culturally sensitive resolutions.

The mechanism is designed in accordance with:

- **AfDB Integrated Safeguards System (ISS, 2023):** OS1 (Environmental and Social Assessment), OS2 (Labor and Working Conditions), OS5 (Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement), and OS10 (Stakeholder Engagement and Information Disclosure).
- **FME<sub>env</sub> Environmental Impact Assessment (EIA)** EIA Act Cap. E12 LFN, 2004 and Public Consultation Guidelines (2014).
- **IFC Good Practice Note on Grievance Mechanisms** and **international best practices**.

The GRM specifically addresses sensitive project issues such as land acquisition, economic displacement, labor and working conditions, environmental impacts, influx of migrant workers, gender-based violence (GBV), sexual exploitation and abuse (SEA), and sexual harassment (SH). It ensures that grievances from vulnerable and marginalized groups—including women, youth, persons with disabilities, informal workers, and smallholder farmers—are equitably heard and resolved, while respecting local cultural norms, traditional dispute resolution practices, and linguistic diversity (Hausa, Fulfulde, Gbagyi, and English).

### 10.1 GRM Structure and Tiers

The Grievance Redress Mechanism (GRM) for the SAPZ Project in Kaduna State is designed as a multi-tiered, participatory, and transparent structure that enables timely and effective resolution of grievances across all project phases—pre-construction, construction, operation, and decommissioning. This structure ensures that affected persons and other stakeholders have access to clear pathways for expressing their concerns or complaints, with escalation options and timelines that are fair, culturally appropriate, and legally grounded.

The GRM is built on three interlinked tiers, progressively addressing grievances at the most immediate level and providing avenues for resolution at higher levels if earlier steps are unsatisfactory. This design promotes conflict de-escalation, reinforces trust, and safeguards the rights of project-affected persons (PAPs), workers, and host communities.

#### **Tier 1: Community-Level Redress Committee (Headed by Traditional Leaders)**



**Description:**

This is the first level of grievance handling, directly at the community level. It builds on trust in traditional governance while embedding project representation to ensure transparency.

**Membership:**

- Village Head / Traditional Leader (Chair)
- Women’s Leader
- Youth Leader
- Farmer Cooperative Representative
- Community-Based Organization (CBO)/CSO representative
- Community Liaison Officer (CLO) – SAPZ PIU

**Functions:**

- Receive and document grievances verbally, in writing, or through grievance boxes.
- Address minor, non-complex issues (e.g., dust, crop damage, misunderstandings, noise).
- Provide quick resolutions through dialogue and mediation.
- Record grievances in a Community Grievance Logbook.
- Refer unresolved or complex issues to Tier 2 within 5–7 working days.

**Advantages:**

- Culturally acceptable and trusted by community members.
- Accessible to vulnerable groups, including women, elders, migrant farmers, and people with disabilities.
- Provides fast-track settlement of simple disputes.

**Tier 2: Local Government Grievance Committee (Headed by LGA Representatives)**

**Description:**

This tier provides a more formal grievance handling mechanism at the LGA level for complaints unresolved at the community stage.

**Membership:**

- LGA Chairman/Representative (Chair)
- SAPZ Desk Officer (LGA Level)
- Traditional Institution Representative



- Women/Youth Representatives
- Local CSO/NGO Representative
- Contractor's Community Liaison Officer (observer only)

**Functions:**

- Investigate unresolved grievances from Tier 1.
- Conduct fact-finding and hearings where necessary.
- Facilitate structured mediation between complainants and project representatives.
- Aim to resolve grievances within 15 working days.
- Maintain formal grievance records and provide written feedback to complainants.

**Types of Issues Handled:**

- Land use and minor acquisition disputes.
- Disruption of access routes and livelihood activities.
- Labor and working condition complaints.
- Contractor/community interface issues.

**Tier 3: State Project Implementation Unit (SPIU) Grievance Committee (Headed by SAPZ Project Coordinator)**

**Description:**

This is the project-level institutional mechanism, led by the State Project Implementation Unit (SPIU). It addresses grievances that cannot be resolved at the community or LGA levels.

**Membership:**

- State Project Coordinator (Chair)
- Environmental Safeguards Officer (SPIU)
- Social Safeguards Officer (SPIU)
- Gender/GBV Specialist
- Legal Officer (Kaduna Ministry of Justice)
- Representative of State Ministry of Agriculture
- Representative of State Ministry of Environment (KEPA)
- AfDB Safeguards Liaison (observer)

**Functions:**



- Review escalated cases from Tier 2.
- Provide policy and safeguard-level solutions.
- Ensure compliance with AfDB ISS (2023) OS1, OS2, OS5, and OS10.
- Resolve grievances within 30 working days.
- Report grievance outcomes to AfDB and FMEnv as part of compliance updates.

#### **Tier 4: Kaduna State Ministry of Agriculture (Headed by Hon. Commissioner / Perm Sec.)**

##### **Description:**

The highest state-level mechanism to address complex grievances not resolved by the SPIU.

##### **Membership:**

- Hon. Commissioner / Permanent Secretary, Ministry of Agriculture (Chair)
- State Attorney General's Office Representative
- State Ministry of Environment Representative (KEPA)
- Independent Mediator/CSO Representative
- SPIU Coordinator (Secretary)

##### **Functions:**

- Handle complex, high-level disputes involving land, resettlement, compensation, or systemic project issues.
- Provide binding administrative decisions where possible.
- Serve as the final institutional avenue before recourse to AfDB IRM or courts.

#### **Tier 5: Independent/External Recourse**

If grievances remain unresolved, complainants may escalate to:

- AfDB Independent Recourse Mechanism (IRM)
- Formal Courts of Law (Judiciary)

This represents the final level of appeal, in line with constitutional rights and AfDB safeguards.

#### **Key Features Across All Tiers**

- **Inclusivity:** Mechanism accessible to all stakeholders, especially vulnerable and marginalized groups.
- **Accessibility:** Toll-free hotlines, SMS/WhatsApp, grievance boxes, community forums, and CLOs.



- **Documentation:** All grievances logged, tracked, and monitored in a centralized GRM database.
- **Confidentiality:** Sensitive cases, including GBV/SEA/SH, handled under a survivor-centered approach.
- **Accountability:** Quarterly reporting of grievance trends to stakeholders, AfDB, and FMEnv.

**Table 10.1: GRM Tiers and Roles**

Tier	Lead Structure	Key Stakeholders	Type of Grievance	Resolution Timeline	Escalation Path
<b>Tier 1: Community-Level</b>	Village Heads, VGRC (incl. CLO, Women & Youth Leaders, Farmer Reps)	Local leaders, PAPs, women, youth, CBOs	Minor nuisances (dust, noise), crop damage, access disputes, misunderstandings	5–7 working days	Escalates to Tier 2 (LGA)
<b>Tier 2: LGA-Level</b>	Local Government Grievance Committee (LGA Chair/Rep + Desk Officers)	LGA officials, traditional leaders, women/youth groups, CSOs	Unresolved land issues, compensation disputes, labor concerns, contractor-community conflicts	15 working days	Escalates to Tier 3 (SPIU)
<b>Tier 3: State Project Implementation Unit (SPIU)</b>	SAPZ Project Coordinator (PC) & PIU Safeguards Team	PIU (E&S Officers, Gender/GBV Specialist, Legal Officer), KEPA, MoA reps	Complex safeguard issues, unresolved labor/environmental grievances, GBV/SEA/SH cases, economic displacement	30 working days	Escalates to Tier 4 (State Ministry of Agriculture)
<b>Tier 4: State Ministry of Agriculture</b>	Hon. Commissioner / Permanent Secretary	State MoA, State Ministry of Justice, KEPA, Independent CSOs, SPIU	High-level land acquisition disputes, systemic compensation issues, resettlement conflicts	30 working days	Escalates to Tier 5 (AfDB IRM or Courts)



Tier	Lead Structure	Key Stakeholders	Type of Grievance	Resolution Time-line	Escalation Path
<b>Tier 5: External Mechanisms</b>	Independent Recourse Mechanisms	AfDB, IRM, FMEnv, Judiciary	Severe rights violations, corruption, unresolved high-level disputes	Variable (per institution)	Final resolution stage

## 10.2 Submission and Resolution Procedures

A transparent and efficient grievance submission and resolution process is essential for maintaining trust between project stakeholders and the SAPZ implementing authorities. This system ensures that individuals, households, or communities negatively impacted or dissatisfied with project activities have a formal, safe, and culturally sensitive channel to voice their concerns, seek clarification, or request remediation.

The following steps outline the comprehensive grievance procedures, developed in line with the AfDB Integrated Safeguards System (ISS, 2023, OS5 & OS10), the Federal Ministry of Environment (FMEnv) EIA Procedural Guidelines (2014), and the SAPZ Grievance Redress Mechanism (GRM) Implementation Concept Note.

### 1. Submission of Grievances

Grievances may be submitted by any stakeholder, including vulnerable and marginalized groups, PAPs, women, youth, herders, migrant workers, CSOs, and traditional institutions. To maximize accessibility and inclusiveness, the project will deploy multiple channels of submission, including innovations outlined in the GRM Concept Note:

**Table 10.2: Modes of Grievance Submission**

Mode	Details
<b>Verbal complaints</b>	During stakeholder meetings, town halls, outreach visits, or directly to the Village Grievance Redress Committee (VGRC).
<b>Written complaints</b>	Handwritten/typed submissions delivered to GRM focal persons, LGA project liaison offices, or project site offices.
<b>GRM Boxes</b>	Secure, locked grievance drop-boxes installed at strategic community points (markets, mosques, churches, council halls, schools).



Mode	Details
Telephone / Toll-Free Line / SMS / WhatsApp	Toll-free hotlines and mobile contacts for GRM focal persons and Community Liaison Officers (CLOs), widely publicized in Hausa and English.
Email	Official SAPZ GRM email address for literate stakeholders.
Third-party submissions	Complaints lodged on behalf of vulnerable or illiterate persons by traditional leaders, NGOs, or family members.

## 2. Acknowledgment and Logging

- Every grievance is logged in the Grievance Management Register (digital and paper-based) maintained at community, LGA, and PIU levels.
- A unique reference number and acknowledgment receipt are issued within 3 working days.
- Grievances are categorized (e.g., land, livelihood, environment, employment, GBV/SEA, etc.).

## 3. Screening and Verification

- Initial screening and verification by GRM Officers within 5 working days.
- Field investigation and interviews conducted where necessary.
- Sensitive cases (e.g., GBV/SEA/SH) are handled under a survivor-centered approach with referral to trained focal points and service providers.

## 4. Resolution and Feedback (Multi-Tiered Mechanism)

- **Tier 1: Village/Community Level (VGRC):** Mediation within 10 working days.
- **Tier 2: LGA/PIU Level:** Escalation to the LGA Grievance Redress Committee or PIU for review within 15 working days.
- **Tier 3: State-Level Appeal Committee:** Chaired by the Hon. Commissioner with SAPZ Coordinator participation; resolution within 30 working days.
- **Final Appeal:** Stakeholders retain the right to approach a Court of Law for unresolved cases.

## 5. Documentation and Monitoring

- All grievance actions are recorded with dates, parties involved, and outcomes.



- A digital GRM dashboard, linked to SAPZ Monitoring & Evaluation (M&E), tracks response times, trends, and resolution rates.
- Quarterly and annual reports (to AfDB, FMEnv, and stakeholders) include statistics on grievances received and resolved.

## 6. Confidentiality and non-retaliation

- Complainants' personal information is protected.
- No stakeholder will face retaliation for lodging a complaint.
- GBV/SEA/SH grievances follow strict confidentiality and survivor consent protocols.

## 7. Feedback to Communities

- Resolution outcomes are shared through town hall meetings, community radio, and notice boards.
- Summaries are translated into local languages (Hausa, Fulfulde, Gbagi) and communicated in oral and visual formats.
- Sensitization and training sessions, as emphasized in the GRM Concept Note, will ensure communities understand how to access and use the mechanism.

Grievances may be submitted by any stakeholder (individual or group), including vulnerable groups, traditional institutions, CSOs, women, youth, and displaced persons. The following avenues are provided to ensure accessibility and cultural sensitivity:

Table 10.2: Submission of grievances

Mode of Submission	Details
Verbal complaints	Submitted during stakeholder meetings, town halls, or directly to the Village Grievance Redress Committee (VGRC).
Written complaints	Handwritten or typed submissions delivered to local GRM focal persons, LGA project liaison offices, or project site offices.
GRM Box	Secure grievance drop-boxes placed at key community locations such as markets, mosques, churches, traditional council halls, and local schools.
Telephone / SMS / WhatsApp	Mobile numbers of GRM focal persons and Community Liaison Officers (CLOs) will be publicly displayed for easy access.
Email	For literate complainants, grievances can be submitted via the official SAPZ project email (to be designated).



Mode of Submission	Details
Third-party sub-missions	Complaints submitted on behalf of vulnerable or illiterate persons by community leaders, NGOs, or family members.

## 2. Acknowledgment and Logging of Grievance

- Upon receipt, all grievances are logged in the Grievance Management Register maintained at the community and project levels.
- A grievance reference number is issued, and an acknowledgement receipt is provided to the complainant within 3 working days.
- The grievance is categorized based on nature and urgency (e.g., land-related, employment, environmental, compensation, social conflict, etc.).

## 3. Screening and Verification

- The GRM Officer or Village Grievance Redress committee (VGRC) conducts an initial screening within 5 working days to verify facts and determine eligibility and required response level.
- For complex issues, a rapid field investigation or interviews with involved parties may be conducted.
- Sensitive or confidential grievances (e.g., involving GBV/SEA) are handled with discretion and referred to trained experts under a survivor-centered approach.

## 4. Resolution and Feedback

- **Tier 1: Village/Community Level:** The VGRC aims to resolve grievances through mediation or dialogue within 10 working days. If resolved, the solution is documented, and the grievance is closed with the complainant's consent.
- **Tier 2: LGA or Project Implementation Unit (PIU) Level:** If unresolved at Tier 1, the complaint is escalated to the LGA GRM Committee or PIU. The grievance is reviewed, and a decision is reached within 15 working days, with written feedback to the complainant.
- **Tier 3: State Level/Independent Panel:** For grievances that remain unresolved, the case is forwarded to the State-level Grievance Redress Committee or an Independent Mediation Panel for adjudication. Resolution is expected within 30 working days.
- **Final Appeal: Court of Law:** If the complainant is still dissatisfied, they retain the constitutional right to seek legal redress in a competent court.



## 5. Documentation and Monitoring

- Each stage of grievance handling is documented, including actions taken, people involved, timelines, and outcomes.
- A centralized digital GRM database (linked to project M&E systems) tracks trends, response times, and satisfaction levels.
- Periodic reporting to stakeholders and the AfDB is conducted, with grievance resolution statistics included in quarterly and annual reports.

## 6. Confidentiality and non-retaliation

- The GRM guarantees confidentiality of personal information and assures stakeholders that there will be no retaliation or retribution for lodging complaints.
- Special protocols are in place for handling sensitive grievances such as Gender-Based Violence (GBV) or Sexual Exploitation and Abuse (SEA) in line with AfDB's Gender Policy (2021).

## 7. Feedback to Community

- Outcomes of grievance resolution are shared with communities during town halls or posted on local notice boards.
- Summaries are translated into local languages (Hausa, Fulfulde and Gbagi) and delivered in accessible formats (oral, visual) to ensure understanding.

## 10.3 Gender-Based Violence (GBV), Sexual Exploitation and Abuse, and Sexual Harassment (SEA/SH) Risk Mitigation

The SAPZ Project in Kuzuntu–Dutsen-Wai, Kubau LGA (ATC) and Daki-Takwas, Chikun LGA (AIH) will engage a large workforce, multiple contractors, and involve close interaction with local communities, including women, youth, and vulnerable groups. These dynamics present potential risks of GBV, SEA, and SH, which could undermine trust, threaten community safety, and compromise the project's social license to operate if not effectively addressed.

In line with the African Development Bank's ISS 2023 (OS10), the IFC Good Practice Note on Addressing GBV in Project Operations, and FMEnv EIA guidelines, the SEP integrates proactive measures to prevent, respond to, and monitor GBV/SEA/SH risks across all project phases.

### How Risks and Concerns Were Identified

The risks and opportunities highlighted were identified through:

- **Community consultations** in Daki-Takwas and Kuzuntu, where women and youth emphasized fear of harassment during large gatherings and exclusion from grievance processes.



- **Baseline assessments** which noted the presence of migrant workers and contractors as a driver of heightened risks of sexual exploitation.
- **Stakeholder feedback** from civil society and women's associations, who stressed the importance of safe, confidential, and culturally sensitive reporting mechanisms.
- **Lessons from past resettlement experiences**, where lack of transparency in grievance management contributed to mistrust.

This feedback was directly used to shape the GBV/SEA/SH mitigation framework.

### Key Principles

- **Zero Tolerance:** Any form of GBV, SEA, or SH is unacceptable and will result in disciplinary action, including termination and referral to relevant authorities.
- **Confidentiality & Survivor-Centred Response:** All reported cases will be handled discreetly, with survivor consent at every stage.
- **Accessibility:** Reporting channels will be safe, inclusive, and culturally appropriate, including Hausa-language options, women focal points, and community-based pathways.
- **Accountability:** All contractors, subcontractors, and project staff will sign and be bound by a **Code of Conduct** prohibiting GBV/SEA/SH.

### Core Mitigation Measures

#### 1. Operational Protocols

- Establish clear referral pathways linking survivors to medical, psychosocial, and legal services.
- Designate trained GBV focal points within the SAPZ PIU, contractors, and GRC structures.
- Integrate GBV/SEA/SH clauses into all contracts and procurement documents.

#### 2. Awareness & Capacity Building

- Conduct mandatory induction and refresher training for all workers on GBV/SEA/SH prevention and response.
- Organize community sensitization sessions (separately for men, women, and youth) on rights, protections, and reporting mechanisms.

#### 3. Secure Consultation Environments

- Ensure meeting venues are safe, well-lit, and accessible to women, youth, and vulnerable groups.
- Schedule consultations at times convenient for women and caregivers.



- Provide security personnel during large gatherings in high-risk areas.

#### 4. Monitoring & Accountability

- Integrate GBV/SEA/SH indicators into the Stakeholder Engagement monitoring framework and grievance redress reporting.
- Report incidents (without identifying survivors) to AfDB and FMEnv as part of compliance updates.
- Link the GBV/SEA/SH monitoring to the multi-level Grievance Redress Committee (GRC) structure to ensure community ownership, escalation pathways, and impartial resolution.

#### 10.4 Integration with the Grievance Redress Mechanism (GRC)

To enhance accountability and strengthen stakeholder confidence, the Stakeholder Engagement Plan (SEP) is fully integrated with the project's Grievance Redress Mechanism (GRC). This ensures that issues, concerns, and feedback emerging from community consultations and engagement activities are systematically documented, addressed, and resolved through a transparent, multi-level process.

The GRCs will be established in each of the two host communities—Daki Takwas (for the Agro-Industrial Hub, AIH) and Kuzuntu (for the Agricultural Transformation Centre, ATC)—as well as in the eight participating LGAs: Kubau, Chikun, Kachia, Kajuru, Soba, Ikara, Lere, and Kagarko. These committees serve as formal platforms for communities to present grievances and receive fair, timely, and confidential resolution.

The mechanism operates through **three structured tiers**:

1. **Community-Level GRC:** Constituted in each host community and chaired by the traditional ruler, the committee includes representatives of women, youth, community-based organizations, local NGOs, the host LGA, and SAPZ officials. It addresses grievances related to land, livelihoods, compensation, employment, and social impacts.
2. **Local Government-Level GRC:** Established in each of the eight participating LGAs, this level also functions as a Monitoring and Compliance Oversight Committee, chaired by the Executive Chairman of the LGA. Members include the Director of Agricultural Services, traditional council representatives, local security personnel, and SAPZ officials. It handles escalated grievances and provides oversight on grievance resolution performance.
3. **State-Level GRC (Appeal Committee):** Chaired by the Honorable Commissioner for Agriculture and supported by the SAPZ Project Coordinator and members of the State Steering Committee, this level addresses complex or unresolved grievances. It ensures compliance with AfDB's Independent Recourse Mechanism (IRM) principles and Nigeria's grievance management standards.



To strengthen awareness and accessibility, the SEP supports the GRC through community outreach programs, radio announcements, information materials in Hausa, Gwari, and Fulfulde, and town hall meetings in each host community and LGA. Community members are encouraged to submit grievances via dedicated GRC desks, toll-free hotlines, or grievance boxes placed at strategic locations.

The Project Implementation Unit (PIU) and Community Liaison Officers (CLOs) coordinate closely with all GRC tiers to ensure prompt response, record-keeping, feedback communication, and reporting. Outcomes from the GRC are integrated into the SEP's monitoring and evaluation framework to support adaptive management and continuous learning.

Through this integration, the SAPZ promotes transparency, inclusivity, and mutual accountability—ensuring that community concerns are addressed constructively, relationships are strengthened, and project benefits are delivered equitably across all participating communities and LGAs.



## CHAPTER ELEVEN-. INSTITUTIONAL RESPONSIBILITIES

The effective implementation, monitoring, and sustainability of the Special Agro-Industrial Processing Zone (SAPZ) project in Kuzuntu–Dutsen-Wai (Kubau LGA) and Daki-Takwas (Chikun LGA) require a clearly defined institutional framework. The success of the Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP), Stakeholder Engagement Plan (SEP), Grievance Redress Mechanism (GRM), and Gender-Based Violence (GBV) mitigation measures hinge on the coordinated efforts of various actors working across multiple tiers of governance.

This section sets out the institutional roles and responsibilities of key stakeholders, including the Project Implementation Unit (PIU), Community Liaison Officers (CLOs), Local Government Authorities (LGAs), contractors, traditional leaders, civil society organizations (CSOs), and relevant regulatory agencies such as the Federal Ministry of Environment (FMEnv) and the Kaduna State Environmental Protection Authority (KEPA). It highlights how these institutions interact at various project phases—from planning and design to construction, operation, and decommissioning—to ensure compliance with national legislation and safeguard requirements under the African Development Bank (AfDB)’s Integrated Safeguards System (ISS).

Additionally, this section elaborates on coordination mechanisms for stakeholder engagement, environmental monitoring, grievance handling, livelihood restoration, and community development initiatives. Institutional capacity, reporting obligations, budget allocations, and accountability structures are also discussed to ensure transparency, effectiveness, and adaptive project management.

This institutional framework not only promotes ownership and inclusivity but also provides a roadmap for risk mitigation, conflict resolution, and long-term sustainability of the SAPZ interventions.

### 11.1 Project implementation Unit (PIU)

The Project Implementation Unit (PIU) serves as the central coordinating body for the implementation of the Special Agro-Industrial Processing Zone (SAPZ) Project in Kaduna State, including the project sites at Kuzuntu–Dutsen-Wai (Kubau LGA) and Taki–Takwas (Chikun LGA). Operating under the authority of the Kaduna State Ministry of Agriculture, the PIU acts as the primary operational link between funding partners, government agencies, contractors, local authorities, and beneficiary communities.

The PIU’s role in Stakeholder Engagement is both strategic and operational, ensuring that engagement activities are planned, implemented, monitored, and reported in line with:

- African Development Bank’s Operational Safeguard 10 on stakeholder engagement.
- FMEnv Environmental Impact Assessment (EIA) Act CAP E12 LFN,2004 requirements for public participation.



- IFC Performance Standard 1 on structured stakeholder engagement.
- IFAD SECAP Guidelines on inclusivity, gender sensitivity, and climate resilience.

## **Core Responsibilities of the PIU in Stakeholder Engagement**

### **1. Planning and Coordination**

- Develop and maintain the Stakeholder Engagement Plan (SEP) as a living document, regularly updated as the project evolves.
- Coordinate with Local Government Authorities (LGAs), community representatives, and traditional leaders to schedule consultations, town hall meetings, and focus group discussions.
- Establish clear and consistent communication channels between all tiers of stakeholders, ensuring transparency and inclusivity.

### **2. Implementation of Engagement Activities**

- Facilitate public consultations using culturally appropriate participation methods, including translation into Hausa, Gwari, Fulfulde, and English.
- Ensure marginalized and vulnerable groups—including women, youth, persons with disabilities, migrant workers, and smallholder farmers—are actively involved in decision-making processes.
- Oversee timely disclosure of project-related information through accessible formats and multiple channels (print, radio, community theatre, social media, and notice boards).

### **3. Grievance Redress Management**

- Operate and oversee the Grievance Redress Mechanism (GRM) across all tiers (community, LGA, SPIU, State Ministry, AfDB IRM/Courts).
- Guarantee confidential, survivor-centered handling of GBV/SEA/SH-related grievances.
- Maintain transparent records of grievances, actions taken, outcomes, and lessons learned.

### **4. Monitoring, Evaluation, and Reporting**

- Track the effectiveness of stakeholder engagement through Key Performance Indicators (KPIs) such as:
  - Participation rates (disaggregated by gender, age, and vulnerability status).
  - Satisfaction levels from surveys and focus group feedback.
  - Number and timeliness of grievances resolved.



- Prepare and submit monthly progress reports to the African Development Bank, FMEnv, Kaduna State Government, and other financing partners.
- Integrate stakeholder engagement performance into the overall ESMP monitoring framework.

## **5. Capacity Building**

- Organize training programs for PIU staff, LGA officials, contractors, and community liaison officers on stakeholder engagement best practices, conflict resolution, and gender-sensitive facilitation.
- Strengthen local institutional capacity (LGAs, traditional councils, CSOs) to sustain engagement beyond the lifespan of the SAPZ project.

## **6. Compliance and Alignment**

- Ensure all engagement activities comply with national laws (FMEnv EIA Act, Land Use Act) and international safeguard standards (AfDB ISS 2023, IFC PS1, OS5, and OS10).
- Serve as the focal point for monitoring, audit, and compliance checks by the AfDB, FMEnv, KEPA, and other oversight bodies.

## **7. Funding and Resource Mobilization**

- Develop a dedicated SEP budget, costed on an annual basis, covering consultations, community outreach, GRM operations, translation, logistics, and capacity-building programs.
- Secure funding through:
  - SAPZ Project Budget allocations (as approved under AfDB financing).
  - Government of Kaduna State contributions for community-level engagement.
  - Donor and partner support for specialized programs (e.g., GBV/SEA/SH training, livelihood restoration dialogues).
- Ensure timely disbursement of funds to avoid disruption of engagement activities.
- Maintain financial accountability through periodic audits, with budget performance reported in quarterly SEP monitoring reports.



Table 11.1: PIU Organizational Linkages in Stakeholder Engagement

Level	Stakeholder Link	Function in Engagement
<b>International</b>	AfDB, IFAD, other development partners	Reporting, compliance monitoring, and funding coordination
<b>National</b>	FMEEnv, Federal Ministry of Agriculture and Rural Development	Policy alignment, EIA approval, national safeguard compliance
<b>State</b>	Kaduna State Ministries and Agencies	State-level policy alignment, resource allocation
<b>Local Government</b>	Kubau LGA, Chikun LGA Authorities	Local-level engagement, mobilization, and grievance coordination
<b>Community</b>	Traditional rulers, farmers' associations, cooperatives	Direct participation, feedback, and local oversight

By acting as the nerve center of all project operations and ensuring continuous, transparent, and inclusive engagement, the PIU plays a decisive role in building trust, ownership, and long-term sustainability of the SAPZ Project in Kaduna State. Without a well-functioning PIU, stakeholder engagement risks becoming fragmented, reactive, and ineffective—compromising both social licenses to operate and project success.

## 11.2 Community Liaison Officers (CLOs)

The Community Liaison Officers (CLOs) are the frontline representatives of the SAPZ Project in each host community. They act as the primary bridge between the Project Implementation Unit (PIU) and the various local stakeholders—ensuring two-way communication, trust-building, and continuous engagement throughout all phases of the project.

For the SAPZ Project in Kuzuntu–Dutsen-Wai (Kubau LGA) and Taki–Takwas (Chikun LGA), the CLOs will be embedded within the communities, enabling them to:

- Understand local priorities, concerns, and cultural dynamics.
- Provide timely updates to both the community and the PIU.
- Facilitate meaningful participation of marginalized groups in decision-making processes.

The role of the CLOs is critical to ensuring that stakeholder engagement is not an occasional event, but a continuous, culturally sensitive, and inclusive process that supports project ownership and social license to operate.



## **Core Responsibilities of CLOs**

### **1. Facilitation of Communication and Information Flow**

- Serve as the day-to-day contact point for project-related queries, feedback, and concerns from community members.
- Disseminate project information—including environmental and social updates, timelines, and potential impacts—using appropriate local languages such as Hausa, Gwari, or Fulfulde.
- Ensure that vulnerable groups, including women, youth, and persons with disabilities, are kept informed and actively involved in discussions.

### **2. Community Mobilization and Participation**

- Organize and facilitate public consultations, focus group discussions, and town hall meetings in collaboration with traditional leaders, local government officers, and the PIU.
- Mobilize community members for capacity-building programs, such as training on climate-smart agriculture, agro-processing skills, and small business development.

### **3. Grievance Redress Facilitation**

- Act as the first point of contact for receiving and documenting grievances, complaints, or suggestions from community members.
- Ensure that grievances are promptly recorded in the GRM logbook, forwarded to the PIU, and tracked until resolution.
- Provide feedback to complainants in a transparent and respectful manner.

### **4. Monitoring of Local Impacts**

- Regularly observe and report on potential environmental, social, or economic impacts of project activities in the communities.
- Support the PIU in monitoring contractor compliance with agreed environmental and social safeguards.

### **5. Cultural Mediation and Conflict Resolution**

- Navigate cultural sensitivities and ensure project actions respect local norms, values, and traditions.
- Help mediate disputes between contractors and community members, or between different interest groups, before they escalate.

### **6. Gender and Social Inclusion**



- Work closely with women’s cooperatives, youth associations, and marginalized groups to ensure their voices are heard and incorporated into project planning and decision-making.
- Apply gender-sensitive approaches consistent with IFAD SECAP and AfDB gender mainstreaming policies.

**Table 11.2: CLOs’ Role Across Project Phases**

<b>Project Phase</b>	<b>CLO Key Tasks</b>	<b>Tools/Methods</b>	<b>Frequency</b>
<b>Planning</b>	Introduce project, gather baseline data on community priorities, facilitate FPIC	Community meetings, surveys, FGDs	Weekly
<b>Con- struction</b>	Share updates, monitor contractor-community relations, record grievances	Notice boards, radio updates, GRM forms	Daily to weekly
<b>Opera- tion</b>	Monitor ongoing impacts, support market linkages, maintain communication	Farmers’ forums, stakeholder review sessions	Monthly or as needed

### **Selection and Capacity Building of CLOs**

- **Criteria for Selection:**
  - Must be respected community members with strong interpersonal skills.
  - Fluency in local language(s) and basic proficiency in English.
  - Neutral and trusted by all community factions.
  - Commitment to upholding transparency, impartiality, and confidentiality.
- **Capacity-Building Support:** CLOs will undergo structured training in:
  - AfDB OS10 and FMEnv EIA public participation guidelines.
  - Conflict resolution and mediation techniques.
  - GRM operations and documentation.
  - Gender-sensitive facilitation.
  - Climate-smart agriculture and environmental monitoring basics.

### **Strategic Importance of CLOs in SAPZ Kaduna**



The CLOs' permanent presence within Kuzuntu–Dutsen-Wai and Taki–Takwas means they can detect emerging concerns early, strengthen local ownership of the SAPZ facilities, and ensure that feedback loops remain active and functional. By being the ears, eyes, and voice of the project at the grassroots level, CLOs are indispensable in protecting the social license to operate and enhancing project sustainability



**Table 11.3: Institutional Roles and Responsibilities Matrix – SAPZ Kaduna**

Actor / Institution	Key Responsibilities	Stakeholder Engagement Role	Grievance Handling Role	Monitoring & Reporting Role	Framework Alignment
<b>Project Implementation Unit(PIU)</b>	Overall coordination, compliance with AfDB, FMEnv, IFC PS1 safeguards	<ul style="list-style-type: none"> <li>Design and oversee SEP implementation- Approve engagement plans and budgets- Liaise with AfDB, FMEnv, Kaduna State ministries</li> </ul>	<ul style="list-style-type: none"> <li>Receive escalated grievances from CLOs and LGAs</li> <li>Ensure resolution timelines and transparency</li> <li>Maintain central GRM database</li> </ul>	<ul style="list-style-type: none"> <li>Ensure regular reporting to AfDB &amp; FMEnv</li> <li>Oversee contractor compliance audits</li> <li>Validate CLO and LGA field reports</li> </ul>	AfDB OS10 (Stakeholder Engagement), FMEnv EIA Act Part IV, IFC PS1
<b>Community Liaison Officers (CLOs)</b>	Daily interface with communities, trust-building, grassroots feedback	<ul style="list-style-type: none"> <li>Facilitate community meetings, FGDs, town halls- Ensure inclusion of vulnerable groups and gender</li> <li>sensitive approaches- Translate technical info into local languages</li> </ul>	<ul style="list-style-type: none"> <li>First point of grievance receipt- Log grievances in GRM forms</li> <li>Provide immediate feedback to complainants and escalate unresolved cases</li> </ul>	<ul style="list-style-type: none"> <li>Weekly community monitoring- Report environmental/social issues to PIU</li> <li>Track implementation of agreed mitigation measures</li> </ul>	IFC PS1 (Stakeholder Identification), IFAD SECAP (Gender & Inclusion)
<b>Local Government Authorities (LGAs)</b>	Local-level coordination, regulatory support, community mobilization	<ul style="list-style-type: none"> <li>Support PIU/CLOs in organizing consultations- Endorse public disclosure events- Mobilize resources for community participation</li> </ul>	<ul style="list-style-type: none"> <li>Mediate grievances where local government authority is relevant</li> </ul>	<ul style="list-style-type: none"> <li>Participate in monitoring missions</li> <li>Validate contractor reports- Provide local regulatory compliance checks</li> </ul>	FMEnv EIA Guidelines, Kaduna State Environmental Laws



Actor / Institution	Key Responsibilities	Stakeholder Engagement Role	Grievance Handling Role	Monitoring & Reporting Role	Framework Alignment
			<ul style="list-style-type: none"> <li>Support conflict resolution between stakeholders</li> </ul>		
<b>Contractors &amp; Service Providers</b>	Project implementation in line with E&S safeguards	<ul style="list-style-type: none"> <li>Engage with CLOs and LGAs before commencing works</li> <li>Provide regular updates to PIU and communities on timelines</li> </ul>	<ul style="list-style-type: none"> <li>Establish on-site grievance collection channels- Address grievances related to construction impacts (noise, dust, access disruption)</li> </ul>	<ul style="list-style-type: none"> <li>Daily site monitoring and reporting to PIU- Maintain compliance logs for environmental and social measures</li> </ul>	AfDB ESMP Guidelines, FMEEnv Construction Codes
<b>Traditional &amp; Religious Leaders</b>	Custodians of community trust, gatekeepers for cultural acceptance	<ul style="list-style-type: none"> <li>Endorse community meetings</li> <li>Advise on cultural protocols</li> <li>Encourage community attendance and buy-in</li> </ul>	<ul style="list-style-type: none"> <li>Provide culturally appropriate dispute resolution</li> <li>Ensure community perspectives are considered in grievance outcomes</li> </ul>	<ul style="list-style-type: none"> <li>Observe and alert CLOs to potential social tensions</li> <li>Support monitoring of community impacts</li> </ul>	IFAD SECAP (FPIC), FMEEnv Socio-Cultural Safeguards

### Interaction and Coordination Mechanisms

To ensure smooth collaboration, the following interaction pathways will be established:

#### 1. PIU ↔ CLOs



- Weekly progress calls and monthly field visits.
- CLOs submit weekly engagement reports and GRM logs to PIU.

## 2. CLOs ↔ LGAs

- Co-facilitate community engagement activities.
- Jointly monitor construction and operational impact



### 3. PIU ↔ Contractors

- Monthly E&S compliance review meetings.
- Contractors submit daily site logs and weekly E&S reports to PIU.

### 4. CLOs ↔ Traditional Leaders

- CLOs seek endorsement before major public consultations.
- Leaders mobilize community participation and reinforce grievance resolution outcomes.

### 5. LGAs ↔ Traditional Leaders

- Collaborate in managing sensitive disputes.
- Support awareness campaigns and policy compliance at community level.

## 11.3 Local Authorities and NGOs

### Role in the SAPZ Kaduna Project

Local Authorities and Non-Governmental Organizations (NGOs) are critical partners in ensuring that the Special Agro-Industrial Processing Zone (SAPZ) in Kaduna State is implemented in a socially inclusive, environmentally responsible, and culturally sensitive manner. Their involvement bridges the gap between the Project Implementation Unit (PIU), the implementing partners, and the local communities.

In the context of Kuzuntu–Dutsen-Wai (Kubau LGA) and Taki–Takwas (Chikun LGA)—two key locations for the SAPZ facilities—local authorities and NGOs play complementary roles:

- Local Government Authorities (LGAs) provide the administrative and regulatory backbone, ensuring project compliance with state and federal laws, while also facilitating official community engagement.
- NGOs, particularly those active in agriculture, environment, women’s empowerment, youth development, and human rights, bring specialized expertise, grassroots networks, and independent monitoring capacity to the table.

### Key Functions

#### 1. Stakeholder Engagement and Mobilization

- **Local Authorities:**
  - Convene official meetings with community leaders and residents.
  - Endorse public consultation activities in line with the FMEnv EIA Act requirement for transparency and public participation.



- Mobilize relevant state departments (e.g., agriculture, environment, land) to support SAPZ initiatives.

- **NGOs:**

- Act as trusted intermediaries for marginalized and vulnerable groups, ensuring their inclusion in the project decision-making process.
- Facilitate thematic focus group discussions (e.g., women farmers, youth cooperatives, persons with disabilities).
- Provide civic education on project impacts, rights, and grievance processes.

## **2. Grievance Redress and Conflict Mediation**

- **Local Authorities:**

- Serve as a neutral mediator when conflicts arise between community members and project contractors.
- Participate in the **second-tier resolution process** within the **Grievance Redress Mechanism (GRM)** before escalation to the PIU.

- **NGOs:**

- Monitor grievance trends to identify systemic issues.
- Support complainants—especially from vulnerable populations—in navigating the GRM.
- Offer alternative dispute resolution services where culturally appropriate.

## **3. Monitoring and Compliance**

- **Local Authorities:**

- Conduct field inspections with PIU and Community Liaison Officers (CLOs) to verify contractor compliance with Environmental and Social Management Plan (ESMP) provisions.
- Ensure construction and operation activities meet local planning and environmental standards.

- **NGOs:**

- Act as independent monitors to assess adherence to AfDB OS10 stakeholder engagement requirements and IFC PS1 transparency principles.
- Publish periodic “civil society project briefs” to keep local residents informed and engaged.



- Track environmental and social indicators, including gender equity, labor conditions, and climate resilience measures.

### Examples of Potential Stakeholders

#### Local Authorities:

- **Kubau LGA Council** – Agriculture and Environment Departments.
- **Chikun LGA Council** – Community Development and Land Use Departments.
- Kaduna State Ministry of Agriculture, Kaduna State Ministry of Environment.

#### NGOs:

- Fadama III Women Farmers Association (agriculture and gender inclusion).
- Kaduna Youth Initiative for Peace and Development (youth empowerment, conflict prevention).
- Women's Rights Advancement and Protection Alternative (WRAPA) (gender-based violence prevention, women's rights).
- **Smallholder Farmers Development Association** (capacity building and market access).

### Alignment with Safeguard Frameworks

- **AfDB OS10:** Emphasizes engagement of representative organizations and civil society actors to strengthen stakeholder participation.
- **FME<sub>env</sub> EIA Act CAP 12, LFN, 2004:** Mandates inclusion of relevant government institutions and community-based organizations in project planning and monitoring.
- **IFC PS1:** Requires systematic engagement with organizations representing affected communities, including NGOs that can speak for vulnerable groups.
- **IFAD SECAP:** Promotes partnerships with local institutions to ensure gender equity, inclusion, and climate-smart solutions.



**Table 11.4: Local Authorities & NGOs Roles Matrix – SAPZ Project, Kaduna State**

Project Phase	Stakeholder Group	Key Responsibilities	Engagement / Compliance Linkages	Relevant Safeguard Alignment
Planning Phase	Local Authorities (Kubau LGA, Chikun LGA, Kaduna State Ministries)	<ul style="list-style-type: none"> <li>• Facilitate initial community entry and introductions.</li> <li>• Endorse public consultations per FMEnv EIA Act.</li> <li>• Mobilize sector specific departments (agriculture, environment, land use).</li> <li>• Provide land-use data and socio-economic baseline information.</li> <li>• Approve stakeholder engagement schedules.</li> </ul>	<ul style="list-style-type: none"> <li>• Joint inception meetings with PIU and CLOs.</li> <li>• Public consultation forums at LGA headquarters.</li> <li>• Written endorsements of engagement plans.</li> </ul>	<p>AfDB OS10 – Early and inclusive engagement.</p> <p>FMEnv EIA Act-Public participation.</p> <p>IFC PS1-Stakeholder identification and analysis.</p>
	NGOs	<ul style="list-style-type: none"> <li>• Map vulnerable groups and advocacy organizations.</li> <li>• Conduct pre-consultation awareness campaigns in local languages.</li> <li>• Facilitate gender-sensitive FGDs for women, youth, and persons with disabilities.</li> <li>• Provide inputs on ESMP design from a civil society perspective.</li> </ul>	<ul style="list-style-type: none"> <li>• FGDs and community workshops.</li> <li>• Briefing notes to PIU.</li> <li>• Participation in socio-economic surveys.</li> </ul>	<p>AfDB OS10- Inclusivity &amp; cultural appropriateness.</p> <p>IFAD SECAP – Gender and vulnerability mainstreaming.</p>



Project Phase	Stakeholder Group	Key Responsibilities	Engagement / Compliance Linkages	Relevant Safeguard Alignment
Construction Phase	Local Authorities	<ul style="list-style-type: none"> <li>Issue necessary construction permits.</li> <li>Monitor compliance with local environmental standards.</li> <li>Participate in joint site inspections with PIU and contractors.</li> <li>Support conflict mediation when land or access disputes arise.</li> </ul>	<ul style="list-style-type: none"> <li>Bi-weekly site inspection reports.</li> <li>Mediation meetings at LGA offices.</li> <li>Participation in GRM Tier 2 resolution.</li> </ul>	<p>AfDB OS10 – Ongoing engagement.</p> <p>FMEnv EIA Act – Monitoring compliance.</p> <p>IFC PS1 – Impact management.</p>
	NGOs	<ul style="list-style-type: none"> <li>Monitor adherence to ESMP commitments.</li> <li>Track labor conditions and report GBV/SEA risks.</li> <li>Provide independent reports to PIU and funding partners.</li> <li>Continue targeted engagement with vulnerable groups.</li> </ul>	<ul style="list-style-type: none"> <li>Monthly monitoring visits.</li> <li>Confidential GBV/SEA referral services.</li> <li>Civil society feedback briefs to PIU.</li> </ul>	<p>AfDB OS10 – Grievance handling.</p> <p>IFC PS1 – Independent monitoring.</p> <p>IFAD SECAP – Safeguards on social equity.</p>
Operation Phase	Local Authorities	<ul style="list-style-type: none"> <li>Support local economic linkages for farmers and SMEs.</li> <li>Monitor environmental performance of SAPZ operations.</li> <li>Continue to mediate and resolve community concerns.</li> </ul>	<ul style="list-style-type: none"> <li>Quarterly stakeholder review forums.</li> <li>Annual environmental audits.</li> <li>LGA representation in PIU oversight meetings.</li> </ul>	<p>AfDB OS10 – Adaptive stakeholder engagement.</p> <p>FMEnv EIA Act – Post-EIA compliance audits.</p>



Project Phase	Stakeholder Group	Key Responsibilities	Engagement / Compliance Linkages	Relevant Safeguard Alignment
		<ul style="list-style-type: none"> <li>Participate in annual stakeholder review meetings.</li> </ul>		
	NGOs	<ul style="list-style-type: none"> <li>Provide ongoing capacity building to farmer cooperatives and processors.</li> <li>Monitor long-term social and environmental impacts.</li> <li>Advocate for continuous inclusion of marginalized groups in supply chains.</li> <li>Support transparency through community scorecards.</li> </ul>	<ul style="list-style-type: none"> <li>Annual community scorecard exercises.</li> <li>Ongoing livelihood and training programs.</li> <li>Periodic independent project impact reports.</li> </ul>	<p>AfDB OS10 – Continuous disclosure.</p> <p>IFC PS1 – Long-term monitoring.</p> <p>IFAD SECAP – Climate-smart and inclusive growth.</p>



## CHAPTER TWELVE- INSTITUTIONAL RESPONSIBILITIES

The effective implementation, monitoring, and sustainability of the Special Agro-Industrial Processing Zone (SAPZ) project in Kuzuntu–Dutsen-Wai (Kubau LGA) and Daki-Takwas (Chikun LGA) require a clearly defined institutional framework. The success of the Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP), Stakeholder Engagement Plan (SEP), Grievance Redress Mechanism (GRM), and Gender-Based Violence (GBV) mitigation measures hinge on the coordinated efforts of various actors working across multiple tiers of governance.

This section sets out the institutional roles and responsibilities of key stakeholders, including the Project Implementation Unit (PIU), Community Liaison Officers (CLOs), Local Government Authorities (LGAs), contractors, traditional leaders, civil society organizations (CSOs), and relevant regulatory agencies such as the Federal Ministry of Environment (FMEnv) and the Kaduna State Environmental Protection Authority (KEPA). It highlights how these institutions interact at various project phases—from planning and design to construction, operation, and decommissioning—to ensure compliance with national legislation and safeguard requirements under the African Development Bank (AfDB)’s Integrated Safeguards System (ISS).

Additionally, this section elaborates on coordination mechanisms for stakeholder engagement, environmental monitoring, grievance handling, livelihood restoration, and community development initiatives. Institutional capacity, reporting obligations, budget allocations, and accountability structures are also discussed to ensure transparency, effectiveness, and adaptive project management.

### 12.1 Key Performance Indicators (KPIs)

Key Performance Indicators (KPIs) are essential tools for measuring the effectiveness, efficiency, and compliance of environmental and social safeguard implementation throughout the lifecycle of the Special Agro-Industrial Processing Zone (SAPZ) project in Kuzuntu–Dutsen-Wai (Kubau LGA) and Daki-Takwas (Chikun LGA). These indicators serve as quantifiable benchmarks that allow project implementers, regulators, stakeholders, and financiers—such as the African Development Bank (AfDB)—to track progress toward environmental, social, and operational objectives set out in the Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP), and related instruments including the Grievance Redress Mechanism (GRM) and Stakeholder Engagement Plan (SEP).

The use of KPIs ensures a transparent, consistent, and results-based approach to project monitoring and evaluation (M&E), aligned with the AfDB’s Integrated Safeguards System (ISS), the Federal Ministry of Environment (FMEnv) guidelines, and Kaduna State Environmental Protection Authority (KEPA) regulations. KPIs are structured across thematic areas such as environmental compliance, occupational health and safety, gender inclusion, grievance resolution, livelihood restoration, biodiversity conservation, and community engagement.



Each KPI is developed with clearly defined metrics, targets, responsible institutions, and reporting timelines. These indicators will support adaptive management by identifying areas requiring corrective action, ensuring early detection of negative trends, and enhancing accountability among contractors, implementing partners, and government stakeholders.

This section provides a detailed framework for KPI identification, categorization, and application, structured by project phases (planning, construction, operation, and decommissioning). It ensures that monitoring is evidence-based, inclusive, and focused on delivering sustainable outcomes for host communities, vulnerable groups, and environmental systems affected by the SAPZ project.

**Table 12.1: Key Performance Indicator (KPI) Mapping for Stakeholder Engagement**

<b>Project Phase</b>	<b>Key Performance Indicator (KPI)</b>	<b>Frequency of Monitoring</b>	<b>Responsible Party</b>
<b>Plan-ning</b>	Number of stakeholder consultations conducted (disaggregated by gender, group, and location)	Monthly	PIU, CLOs, Environmental/Social Consultant
	Timely disclosure of project information in accessible formats and local languages	Bi-monthly	PIU, CLOs, Local Government Authorities
	Inclusion of vulnerable groups (e.g., women, PWDs, IDPs) in stakeholder engagements	Quarterly	CLOs, NGOs/CSOs, Traditional Leaders
	Documentation and availability of consultation records (attendance, minutes, photos)	Continuous	PIU, CLOs
	Functionality of grievance mechanism established (hotline, registers, focal points)	Monthly	PIU, CLOs, M&E Officer
	Number of awareness sessions on project scope, rights, and responsibilities	Monthly	CLOs, LGA Officials, NGOs
	<b>Con-struction</b>	Number of grievances received, resolved, and pending (disaggregated by type and gender)	Weekly
Response time to grievances (average days)		Weekly	PIU, CLOs, Contractor



Project Phase	Key Performance Indicator (KPI)	Frequency of Monitoring	Responsible Party
	Community complaints about construction activities (e.g., noise, access, safety)	Weekly	CLOs, Contractors
	Number of joint site inspections with community representatives	Monthly	PIU, Contractors, CLOs
	Rate of compliance with stakeholder engagement action plan milestones	Monthly	PIU, M&E Unit
	Engagement frequency with traditional authorities and community leadership	Monthly	CLOs, Traditional Leaders
<b>Operation</b>	Community satisfaction level with project operations (via periodic surveys or FGDs)	Bi-annually	PIU, NGOs/CSOs, M&E Unit
	Number of stakeholder meetings organized during operations phase	Quarterly	PIU, CLOs, Facility Operator
	Functionality of grievance redress mechanism during operations	Quarterly	CLOs, PIU, Operator
	Inclusion of women and youth in operational feedback sessions	Bi-annually	CLOs, NGOs, CSOs
	Monitoring visits by AfDB and FMEnv on SEP implementation and community compliance	Semi-annually	PIU, FMEnv, AfDB
	Feedback loop closure rate (percentage of grievances or suggestions that led to change)	Quarterly	PIU, M&E Unit, Operator

**Notes:**

- **PIU:** Project Management Unit
- **CLOs:** Community Liaison Officers
- **CSOs/NGOs:** Civil Society Organizations/Non-Governmental Organizations
- **M&E Unit:** Monitoring and Evaluation Unit



- **FME<sub>env</sub>**: Federal Ministry of Environment
- **AfDB**: African Development Bank
- **PWDs**: Persons with Disabilities
- **IDPs**: Internally Displaced Persons

## 12.2 Stakeholder Feedback Mechanism

An effective Stakeholder Feedback Mechanism (SFM) is a central pillar of participatory and inclusive development, ensuring continuous dialogue between project proponents and stakeholders throughout the project lifecycle. In the context of the Special Agro-Industrial Processing Zones (SAPZ) project in Kuzuntu–Dutsen-Wai and Daki-Takwas, this mechanism is designed to solicit, record, evaluate, and respond to feedback in a structured and culturally sensitive manner. It also complements the Grievance Redress Mechanism (GRM) by enabling early detection and resolution of concerns, and by improving overall project design and implementation.

The feedback mechanism aims to promote accountability, transparency, and community ownership, thereby improving project sustainability and stakeholder trust. It is in line with AfDB’s OS1 (Environmental and Social Assessment) and OS10 (Stakeholder Engagement), as well as the FME<sub>env</sub> EIA guidelines that emphasize early and sustained stakeholder participation.

### Key Objectives of the Feedback Mechanism

1. Enable two-way communication between the Project Implementation Unit(PIU) and stakeholders.
2. Gather inputs, suggestions, and recommendations for continuous improvement of project design and implementation.
3. Track perceptions and community sentiment throughout the project lifecycle.
4. Prevent escalation of minor issues by responding early and adequately to concerns.
5. Improve transparency and build trust among communities and local stakeholders.
6. Ensure inclusiveness, particularly of women, youth, elderly, and vulnerable groups.

**Table 12.2: Core Elements of the Stakeholder Feedback Mechanism**

Component	Description
<b>Feedback Collection Tools</b>	Verbal feedback during community meetings, suggestion boxes, mobile feedback forms (paper-based and digital), SMS platforms, WhatsApp groups, and surveys.



Component	Description
<b>Channels of Feedback</b>	Community Liaison Officers (CLOs), Local Authorities (e.g., LGA Desk Officers), Community Focal Points, and local radio announcements.
<b>Frequency</b>	Continuous throughout the project, with monthly feedback reviews and quarterly stakeholder review meetings.
<b>Feedback Re-cording</b>	All feedback is documented using a standardized logbook or digital platform, with classification by type (suggestion, concern, inquiry, commendation).
<b>Analysis and Reporting</b>	PIU M&E team analyzes trends and recurring issues for decision-making and corrective actions. Summary feedback reports shared quarterly with stakeholders.
<b>Response Timeline</b>	Feedback is acknowledged within 48 hours, and response/resolution is provided within 14 working days, unless otherwise specified.
<b>Integration with GRM</b>	Complaints or grievances raised through the feedback channels are referred to the GRM when formal resolution procedures are required.
<b>Monitoring</b>	Feedback utilization is tracked through Key Performance Indicators (e.g., % of feedback resolved, time to resolution, % of feedback integrated into project updates).

### Cultural and Local Sensitivities

Given the sociocultural dynamics in Kuzuntu–Dutsen-Wai and Daki-Takwas, feedback mechanisms are adapted to be culturally appropriate and accessible, including:

- Use of Hausa language and pictorial materials for those with limited literacy.
- Gender-sensitive approaches, such as separate focus group discussions for women and youth.
- Leveraging traditional leadership structures and community influencers to enhance trust and participation.

**Table 12.3: Roles and Responsibilities**

Actor	Responsibility in Feedback Mechanism
<b>PIU (Stakeholder Engagement Lead)</b>	Oversees implementation, reporting, and integration of feedback into project decision-making.



<b>Actor</b>	<b>Responsibility in Feedback Mechanism</b>
<b>Community Liaison Officers (CLOs)</b>	Frontline officers who collect, log, and respond to community feedback on a regular basis.
<b>Local Government Representatives</b>	Facilitate linkages with LGA structures and provide local oversight and credibility to the process.
<b>Traditional Leaders</b>	Mobilize communities and reinforce legitimacy of feedback processes through local authority structures.
<b>NGOs/CSOs</b>	Act as third-party facilitators to ensure independent monitoring and encourage broader participation.

### **Feedback Reporting and Learning**

To ensure the mechanism supports continuous learning, quarterly feedback reports will:

- Highlight emerging issues and trends.
- Document actions taken and stakeholder satisfaction.
- Recommend adaptive strategies for project implementation.

These reports will be disseminated in community meetings, town halls, and online platforms, fostering an open environment for shared accountability and collective progress.

### **12.3 Adaptive Management**

Adaptive management is a structured, iterative process of robust decision-making in the face of uncertainty, with an aim to reduce uncertainty over time via system monitoring. Within the context of the SAPZ project in Kaduna State, adaptive management plays a pivotal role in ensuring that environmental and social safeguards are not only maintained but improved upon throughout the lifecycle of the project—from planning to operation.

It recognizes that no Environmental and Social Impact Assessment (ESIA), Livelihood Restoration Plan (LRP), or Resettlement Action Plan (RAP) can foresee all possible changes or challenges that might emerge during the implementation of a complex infrastructure-agriculture interface like the SAPZ. Therefore, adaptive management ensures the project remains flexible, responsive to stakeholder feedback, sensitive to evolving environmental or social conditions, and capable of institutional learning.

#### **Key Features of Adaptive Management for SAPZ**

1. **Feedback Loop Integration:** Adaptive management allows project implementers to integrate new data from stakeholder consultations, grievance redress mechanisms



(GRM), community monitoring, environmental indicators, or government directives into decision-making in real time.

2. **Responsive Mitigation Measures:** If an initial mitigation strategy is found to be ineffective—e.g., an erosion control mechanism fails due to unforeseen rainfall patterns—alternative or enhanced measures are promptly developed and implemented.
3. **Stakeholder-Informed Adjustments:** Engagement platforms such as FGDs, KIIs, and periodic town hall meetings enable community members, traditional authorities, farmers, and women/youth groups to raise concerns. The feedback received guides adaptive changes to stakeholder engagement strategies, livelihood support interventions, or GBV mitigation approaches.
4. **Scenario Planning and Risk Reassessment:** Based on updated environmental monitoring or local conflict dynamics, new risk scenarios can be developed. For example, changes in local land use patterns or security concerns may trigger revisions in site access plans or contractor schedules.
5. **Monitoring, Evaluation, and Learning (MEL) Integration:** Adaptive management in SAPZ is linked closely with MEL frameworks and KPIs. Evaluation outcomes inform project managers whether targets are being met and whether assumptions are holding true. Lessons learned are documented and applied in future planning.
6. **Institutional Accountability:** The Project Implementation Unit(PIU), Community Liaison Officers (CLOs), and relevant government agencies (e.g., Kaduna Ministry of Agriculture, KEPA) are tasked with periodically reviewing E&S data and convening coordination meetings to decide on necessary changes. The AfDB Task Team and FMEEnv compliance officers are kept informed through quarterly reports and audits.

**Table 12.4: Examples of Adaptive Management Applications in SAPZ**

Area of Application	Trigger for Change	Adaptive Action Taken
Stakeholder Engagement Strategy	Low turnout of women at consultations	Female CLOs and women-led NGOs engaged to redesign and lead targeted sessions
Environmental Monitoring	Groundwater nitrate levels rising	Modification of water abstraction points and introduction of on-site treatment units
GBV Risk Mitigation	Increased reported GBV incidents	Introduction of mobile reporting hotline and collaboration with local protection NGOs
Construction Activities	Conflict between community and contractors	Mediation by traditional leaders and adjusted work schedule to avoid cultural events



Adaptive management is not just a technical necessity; it is a governance imperative for the SAPZ program in Kaduna State. By proactively addressing emerging issues and integrating stakeholder inputs, it enhances project legitimacy, ensures regulatory compliance, and secures sustainable development outcomes. This dynamic approach builds community trust, safeguards environmental assets, and strengthens institutional learning across the entire project lifecycle.



## CHAPTER THIRTEEN-BUDGET AND RESOURCES

The successful implementation of the Stakeholder Engagement Plan (SEP) for the SAPZ project in Kuzuntu–Dutsen-Wai and Daki-Takwas requires dedicated and well-structured financial and human resource allocations. Budgeting and resourcing are critical enablers that ensure the continuous, inclusive, and culturally appropriate engagement of all stakeholders throughout the project lifecycle—from planning and construction to the operational phases.

Given the complex stakeholder landscape involving local communities, traditional institutions, farmer cooperatives, vulnerable groups, local government authorities, civil society organizations, and regulatory bodies, it is imperative that the SEP be adequately resourced to support timely consultations, effective grievance redress mechanisms, inclusive participation, and sustained capacity building. Furthermore, the budget must also accommodate provisions for unforeseen engagement needs, conflict mediation, gender-sensitive communication, and monitoring and evaluation frameworks.

In compliance with the AfDB's Operational Safeguard 1 (OS1) and the Federal Ministry of Environment's (FMEnv) EIA procedural guidelines, the SEP budget ensures that the principles of Free, Prior, and Informed Consent (FPIC), transparency, equity, and social accountability are upheld at all levels. Resources allocated are designed to cover key stakeholder engagement activities such as public consultations, disclosure campaigns, translation and interpretation services (especially into Hausa and other local dialects), community liaison functions, field logistics, grievance resolution mechanisms, and reporting systems.

### 13.1. Engagement Costs

Stakeholder engagement is not only a regulatory requirement but also a strategic investment that contributes to the long-term success and sustainability of the SAPZ project. Engagement costs refer to all the financial commitments necessary to ensure inclusive, transparent, and continuous interaction with stakeholders across all phases of the project—from pre-construction through construction, operation, and decommissioning. These costs cover a broad range of activities designed to promote dialogue, disseminate project information, address concerns, build trust, and manage social risks effectively.

In the context of the SAPZ project in Kaduna State, the stakeholder landscape includes a diverse group of actors—community members, traditional rulers, women and youth groups, civil society organizations, environmental agencies, local government representatives, and vulnerable populations. To maintain meaningful and culturally appropriate engagement, specific cost categories have been identified and incorporated into the project's financial planning.

#### Key Components of Engagement Costs:

##### 1. Stakeholder Consultations:

- Costs for organizing town hall meetings, focus group discussions, community dialogues, and validation workshops.



- Expenses include venue rentals, refreshments, security, local transportation, communication materials, and audio-visual equipment.
- 2. Communication and Information Disclosure:**
- Design, printing, and translation of project information (in English and Hausa) into posters, flyers, newsletters, and leaflets.
  - Dissemination via radio jingles, local newspapers, town criers, and social media.
- 3. Grievance Redress Mechanism (GRM):**
- Establishment and maintenance of grievance redress desks in both ATC and AIH communities.
  - Recruitment and training of grievance focal points, development of registers, feedback mechanisms, and resolution documentation.
- 4. Capacity Building and Training:**
- Training sessions for community liaison officers, project staff, women/youth representatives, and local facilitators on stakeholder engagement, gender inclusion, and conflict sensitivity.
  - Hiring of trainers and development of manuals or toolkits.
- 5. Monitoring and Reporting:**
- Engagement-related data collection, field verification, travel, logistics, and reporting.
  - Baseline perception surveys, mid-term reviews, and end-line evaluations.
- 6. Community Liaison Operations:**
- Operational expenses for full-time or part-time Community Liaison Officers (CLOs), including stipends, field allowances, transportation, and mobile phone/data costs.
- 7. Conflict Mediation and Emergency Engagements:**
- Costs for urgent interventions in cases of social tension, misunderstandings, or resistance.
  - Mobilization of mediators, traditional councils, and neutral facilitators.
- 8. Miscellaneous and Contingency:**
- Reserved funds to address unexpected costs, such as engagement with new stakeholders, emergency communication needs, or changes in the engagement strategy due to project risks or community dynamics.



### **13.2 Financial Justification:**

Failure to invest adequately in engagement may result in delays, resistance, or reputational damage to the project. Therefore, appropriate budgeting for engagement costs ensures that all stakeholders feel heard, respected, and involved in decision-making processes that affect their lives and environment.

The cost structure is designed to be realistic, context-specific, and adaptive, ensuring that funds are allocated to both planned and unforeseen engagement needs throughout the lifecycle of the project. In the subsequent section, these costs are presented in a tabular format for clarity and ease of implementation, with estimates in Nigerian Naira (₦), organized by activity, frequency, and responsible party.



Table 13.1: Stakeholder Engagement Budget for SAPZ Project

S/N	Engagement Activity	Description	Unit Cost (₦)	Frequency / Quantity	Total Cost (₦)	Total Cost (USD)	Responsible Party
1	Stakeholder Engagement by Phase	Planning, construction & operational phase engagement with multiple stakeholder groups	5,000,000	12 engagements/year × 2 LGAs	60,000,000	40,000	PIU + LGAs + Traditional Councils
2	Stakeholder Consultations	Townhalls, FGDs, validation workshops (venue, logistics, refreshments, security)	500,000	6 sessions/year × 2 LGAs	6,000,000	4,000	Consultant + PIU + Local Gov't
3	Information Materials & Disclosure	Design, translation, printing of leaflets/posters in Hausa, Gwari, Fulfulde & English	300,000	Quarterly (4× per year)	1,200,000	800	Consultant + PIU
4	Media Engagement	Community radio, jingles, town criers, local newspapers	250,000	Biannual (2× per year)	500,000	333	PIU + Media Consultant
5	GRM Setup	Grievance desk, registers, toll-free lines, training officers, awareness	400,000	Initial setup	400,000	267	PIU + Consultant



Stakeholders Engagement Plan (SEP) for the Proposed Kaduna SAPZ Project (AIH and ATC)

S/N	Engagement Activity	Description	Unit Cost (₦)	Frequency / Quantity	Total Cost (₦)	Total Cost (USD)	Responsible Party
6	GRM Running Costs	Allowances, mobile/data, logistics for VGRCs (Kubau & Chikun LGAs)	100,000	12 months × 2 LGAs	2,400,000	1,600	PIU
7	Community Liaison Operations	Monthly stipends & logistics for 2 CLOs (1 per LGA)	150,000	12 months × 2 CLOs	3,600,000	2,400	PIU
8	Monitoring & Reporting	Perception surveys, site visits, ESMP/SEP progress reporting	300,000	Biannual (2× per year)	600,000	400	M&E Specialist + Consultant
9	Conflict Mediation & Emergency Dialogues	Conflict resolution meetings, mediation, traditional council dialogues	500,000	2 per year	1,000,000	667	PIU + Traditional Councils
10	Transportation & Logistics	Vehicles, fuel, local travel reimbursements for engagement team	200,000	Monthly × 12 months	2,400,000	1,600	PIU + Consultant
11	Vulnerable Group Inclusion	Transport stipends & refreshments for women, youth, elderly, disabled	100,000	6 meetings/year × 2 LGAs	1,200,000	800	PIU + CLOs



Stakeholders Engagement Plan (SEP) for the Proposed Kaduna SAPZ Project (AIH and ATC)

S/N	Engagement Activity	Description	Unit Cost (₦)	Frequency / Quantity	Total Cost (₦)	Total Cost (USD)	Responsible Party
12	Contingency (5%)	Buffer for unforeseen engagement activities	-	-	1,200,000	800	PIU + Project Coordinator
13	Training: AfDB ISS/IFC/FMEnv/KEPA Guidelines	Orientation for PIU, CLOs, LGAs, Contractors	2,000,000	1 initial + annual refresher	24,000,000	16,000	PIU Safeguards + Consultants
14	Training: Participatory Stakeholder Engagement	Techniques for CLOs, NGOs, PIU staff	1,600,000	Quarterly	19,200,000	12,800	Social Expert + PIU
15	Training: GRM	For GRCs, leaders, PAP reps	2,000,000	Biannual	16,000,000	10,667	PIU Legal & Social Officers
16	Training: Conflict Sensitivity	Skills for CLOs, contractors, mediators	1,600,000	Biannual	12,800,000	8,533	PIU + NGO Partner
17	Training: Gender & Inclusion	Women, youth, vulnerable group integration	1,900,000	Biannual	15,200,000	10,133	PIU Gender Desk + Specialist
18	Community Sensitization	Awareness on project objectives & rights	4,000,000	Quarterly	32,000,000	21,333	CLOs + LGAs
19	Training: Risk Communication	On environmental & social risks	3,000,000	At each project phase	12,000,000	8,000	PIU + KEPA/FMEnv



Stakeholders Engagement Plan (SEP) for the Proposed Kaduna SAPZ Project (AIH and ATC)

S/N	Engagement Activity	Description	Unit Cost (₦)	Frequency / Quantity	Total Cost (₦)	Total Cost (USD)	Responsible Party
20	Training: M&E of Engagement	Building capacity on monitoring tools & KPIs	2,600,000	Annual	10,400,000	6,933	PIU M&E Unit + Independent Auditor
21	IEC Materials (posters, flyers, brochures)	Design & dissemination of IEC materials	2,000,000	Each project phase	8,000,000	5,333	Communications Officer
22	NGO/CSO Capacity Strengthening	Training NGOs/CSOs on E&S monitoring	3,200,000	Annual	12,800,000	8,533	PIU + Independent Monitoring Consultant
23	GRM Toll-Free Hotline	Establishment & annual subscription	3,000,000	Annual	3,000,000	2,000	PIU
24	GRM Awareness & Sensitization Campaigns	Publicizing grievance access channels	2,500,000	Annual	2,500,000	1,667	PIU + CLOs
25	Grievance Box Installation	Installation & maintenance at strategic community points	750,000	2 LGAs	1,500,000	1,000	PIU + CLOs
<b>TO-TAL</b>					<b>₦251,100,000</b>	<b>\$167,400</b>	PIU (Lead) + Partners

USD equivalents are calculated at an exchange rate of ₦1,500 = \$1 (AfDB standard conversion rate may be applied at disbursement stage)



### 13.3 Capacity Building for Stakeholder Engagement

Effective stakeholder engagement is contingent on the presence of knowledgeable, skilled, and well-equipped personnel who can facilitate inclusive, participatory, and responsive dialogue throughout the lifecycle of the project. Capacity building for stakeholder engagement refers to the strategic investment in training, knowledge-sharing, institutional strengthening, and technical support to ensure that all individuals and institutions involved in stakeholder outreach, consultation, grievance redress, and communication are adequately empowered to fulfil their roles effectively and sensitively.

For the SAPZ Agricultural Transformation Centre (ATC) in Kuzuntu–Dutsen-Wai, Kubau LGA, capacity building is especially critical given the multi-stakeholder landscape involving local communities (including vulnerable groups), traditional leaders, Local Government Authorities (LGAs), state MDAs, contractors, civil society organizations (CSOs), and the Project Implementation Unit (PIU). Strengthening the capacities of these actors helps to foster trust, manage expectations, pre-empt and resolve conflicts, and ensure stakeholder voices—particularly those of women, youth, and marginalized persons—are represented and considered in project decision-making.

#### Key Objectives of Capacity Building

- Enhance the technical and communication skills of Project Implementation Unit (PIU) staff, Community Liaison Officers (CLOs), contractors, and local authorities to engage meaningfully with stakeholders.
- Ensure understanding of safeguard policies, such as AfDB’s OS1 (Environmental and Social Assessment), OS 5 (land Acquisition, Restrictions on Access to land and land use, and Involuntary Resettlement and OS10 (Stakeholder Engagement), as well as FMEnv and KEPA standards.
- Promote awareness among community members about their rights, responsibilities, and available channels for feedback, grievance reporting, and participation.
- Build local ownership and sustainability by empowering local institutions and NGOs to actively contribute to stakeholder engagement and environmental monitoring.

#### Capacity Building Modalities

The project will adopt a range of training and support modalities tailored to the needs of different stakeholder groups:

- **Training Workshops and Seminars:** Structured capacity-building sessions will be held on topics including participatory engagement methods, environmental and social safeguards, grievance handling procedures, gender-responsive engagement, and effective communication strategies.



- **On-the-Job Training and Mentoring:** Field-based coaching and mentoring will be provided to CLOs and community facilitators by experienced trainers, especially during early phases of engagement or where challenges arise.
- **Exchange and Peer Learning:** Cross-site learning visits, where feasible, will be arranged for local government staff and traditional leaders to observe best practices from other SAPZ or agricultural infrastructure projects.
- **Development of IEC Materials:** Easy-to-understand training and awareness materials will be developed in Hausa and English, including visual aids, flipcharts, brochures, and posters.

### **Target Beneficiaries**

- PIU Environment and Social Safeguards Team
- Community Liaison Officers (CLOs)
- Local Government Authorities (LGAs)
- Contractor site supervisors and social teams
- Traditional leaders and youth/women group representatives
- Representatives from NGOs and CBOs
- Grievance Redress Committee (GRC) members

### **Monitoring and Evaluation**

Each capacity-building activity will include pre- and post-training assessments to gauge knowledge acquisition and identify areas requiring further reinforcement. Feedback mechanisms will be incorporated to refine future training delivery.



Table 13.2: Capacity Building Activity Plan

S/N	Training Topic / Activity	Target Audience	Frequency	Responsible Party	Estimated Cost (₦)
1	Introduction to AfDB ISS, IFC PS1, FMEnv & KEPA EIA Guidelines	PIU Safeguards Team, CLOs, LGA Officers, Contractors' Social Teams	Once at project start, refresher annually	PIU E&S Specialists, External E&S Consultants	₦24,000,000
2	Participatory Stakeholder Engagement Techniques	CLOs, PIU Social Team, LGA Officers, NGOs	Quarterly during project lifecycle	External Social Expert, PIU Social Officer	₦19,200,000 annually
3	Grievance Redress Mechanism (GRM) Training	GRC Members, Community Leaders, Women/Youth Group Leaders	Bi-annually or upon new GRC formation	PIU Social Officer, Legal Advisor	₦16,000,000 annually
4	Conflict Sensitivity and Negotiation Skills	CLOs, PIU Staff, Contractor Site Supervisors, Community Mediators	Bi-annually	Conflict Resolution Specialist, NGO Partner	₦12,800,000 annually
5	Gender-Responsive Engagement & Inclusion of Vulnerable Groups	CLOs, PIU Staff, Women & Youth Representatives, Local CSOs	Bi-annually	Gender Specialist, PIU Gender Desk	₦15,200,000 annually
6	Community Sensitization on Project Objectives and Stakeholder Rights	General Community Members, Traditional Rulers, Farmer Groups	Quarterly	CLOs, LGA Representatives, Ward Facilitators	₦32,000,000 annually



Stakeholders Engagement Plan (SEP) for the Proposed Kaduna SAPZ Project (AIH and ATC)

S/N	Training Topic / Activity	Target Audience	Frequency	Responsible Party	Estimated Cost (₦)
7	Environmental and Social Risk Communication	PIU, Contractors, CLOs, Community Leaders	At the start of each project phase	Environmental Consultant, KEPA/FMEnv Officer	₦12,000,000 per phase
8	Monitoring and Evaluation (M&E) of Stakeholder Engagement	PIU M&E Team, LGAs, CSO Monitors	Annually	PIU M&E Officer, Independent Auditor	₦10,400,000 annually
9	Development and Use of IEC Materials (Posters, Flyers, Brochures)	CLOs, Community Mobilizers, Project Awareness Teams	Once per project phase	Communications Consultant, PIU Communications Officer	₦8,000,000 per phase
10	Capacity Building for Local NGOs/CSOs on E&S Monitoring	Local NGOs/CSOs	Annually	PIU, Independent Monitoring Consultant	₦12,800,000 annually



## **CHAPTER FOURTEEN: EVIDENCE OF PREVIOUS CONSULTATIONS CONDUCTED DURING ESIA FOR THE AIH AND ATC SITES**

### **14.1 Introduction**

Stakeholder consultation is a cornerstone of the Environmental and Social Impact Assessment (ESIA) process and a mandatory requirement under the African Development Bank's Integrated Safeguards System (ISS 2023), particularly Operational Safeguard (OS) 1: Environmental and Social Assessment and OS5: Land Acquisition, Restrictions on Access to Land and Land Use, and Involuntary Resettlement. It is also consistent with the Federal Ministry of Environment's (FMEnv) Environmental Impact Assessment Procedural Guidelines (2014) and the Kaduna State Environmental Protection Authority (KEPA) standards.

The consultations conducted during the ESIA for the Agro-Industrial Hub (AIH) in Daki-Takwas, Chikun LGA, and the Agricultural Transformation Center (ATC) in Kuzuntu–Dutsen-Wai, Kubau LGA were designed to ensure inclusivity, transparency, and accountability in project planning. They provided a structured platform for Project Affected Persons (PAPs), traditional authorities, women, youth, farmer cooperatives, civil society organizations (CSOs), local government officials, and regulatory agencies to share their perspectives, concerns, and expectations.

The primary objectives of these consultations were to:

- Provide early and clear information about the SAPZ project scope, objectives, and anticipated impacts.
- Gather and document stakeholder concerns, particularly those relating to land acquisition, displacement, and livelihoods.
- Identify opportunities for community participation, benefit-sharing, and co-design of mitigation measures.
- Strengthen trust and social license to operate by addressing grievances and building consensus on project implementation.
- Ensure the active inclusion of vulnerable and marginalized groups (women, youth, persons with disabilities, and smallholder farmers).

Importantly, the consultations revealed not only opportunities for collaboration but also areas of sensitivity and dissent, such as the Kuzuntu incident, where initial resistance and mistrust emerged. These experiences underline the value of structured mechanisms for dialogue, conflict resolution, and ongoing engagement, which have now been institutionalized through the Stakeholder Engagement Plan (SEP) and the Grievance Redress Mechanism (GRM).

The following sections present documented evidence of ESIA consultations, including site-specific outcomes for Kubau and Chikun LGAs, key issues raised by stakeholders, and the



mechanisms employed to resolve disputes. Detailed records—such as attendance registers, signed minutes, and photographic evidence—are attached as annexes to this report.

## 14.2 Overview of Consultations Conducted During ESIA

During the ESIA process for the Kaduna State Special Agro-Industrial Processing Zone (SAPZ), a series of structured consultations were carried out at both the Agro-Industrial Hub (AIH) in Daki-Takwas, Chikun LGA and the Agricultural Transformation Center (ATC) in Kuzuntu–Dutsen-Wai, Kubau LGA. These engagements were designed in accordance with the AfDB ISS (2023), FMEnv EIA Procedural Guidelines, and KEPA consultation requirements, ensuring that the process was participatory, inclusive, and culturally sensitive.

The consultations followed a multi-tier approach that included:

- Initial sensitization meetings with traditional rulers, community leaders, and council members to introduce the SAPZ project and ESIA objectives.
- Focused sessions with Project Affected Persons (PAPs) to identify concerns about land acquisition, resettlement, and livelihoods.
- Thematic discussions with women’s groups, youth associations, farmers’ cooperatives, and vulnerable persons to ensure that inclusion and equity were mainstreamed.
- Engagement with local authorities and regulators to align project activities with statutory procedures and safeguards.

These engagements were conducted at strategic venues across the host communities, including village squares, traditional council halls, LGA chambers, and accessible community meeting points. In line with good practice, discussions were held in local languages (Hausa and Gwari) to ensure broad understanding, while written records were prepared for transparency and accountability.

Across both LGAs, the consultations were characterized by:

- Strong interest in project opportunities, particularly around employment creation, skills development, and value-chain participation.
- Concerns about displacement and resettlement, with several community members (notably in Kuzuntu and Sabon Birnin Kasarami) referencing past experiences of unmet promises.
- Environmental and social concerns, including risks of farmland loss, water resource competition, and forest degradation.
- Community resistance in specific cases, especially in Kuzuntu, where initial opposition required escalation to the LGA level and mediation by neutral actors before agreement was reached.



The consultations provided valuable insights into community priorities, risks, and opportunities that have directly informed the development of the SEP, RAP/LRP, ESMP, and GRM frameworks. The detailed evidence of these engagements, including attendance registers, minutes, and photographs, is presented in the annexes to this report.

### **14.3 Key Themes and Issues Raised**

The consultations conducted during the ESIA process highlighted a range of recurring themes, concerns, and opportunities across the two project sites (Kuzuntu–Dutsen-Wai in Kubau LGA and Daki-Takwas/Sabon Birnin Kasarami/Gonin Gora in Chikun LGA). These concerns reflect both community priorities and context-specific risks associated with the implementation of the SAPZ program.

#### **1. Land Acquisition and Displacement**

- Communities expressed strong concerns over the potential loss of farmland currently under cultivation.
- At Kuzuntu and Sabon Birnin Kasarami, mistrust stemmed from previous land allocations where communities alleged that promises of compensation or relocation support were not fully honored.
- PAPs in Gonin Gora Garden raised concerns about resettlement planning, emphasizing the need for transparent and fair processes under the RAP/LRP framework.

#### **2. Mistrust and Legacy of Past Experiences**

- Particularly in Kuzuntu, community members highlighted a trust deficit due to unmet commitments during earlier land-related interventions.
- Some stakeholders initially reneged on agreements, underscoring the need for neutral mediation mechanisms and stronger assurances of benefit-sharing.

#### **3. Livelihoods and Employment Opportunities**

- Across both LGAs, there was strong interest in ensuring that local community members—especially youth and women—are prioritized for employment in project construction and operations.
- At Daki-Takwas, traditional leaders pledged support but emphasized the importance of linking the project to job creation and skills development for community members.

#### **4. Environmental and Social Concerns**

- Farmers and community representatives raised issues related to competition for water resources, potential forest degradation, and ecosystem impacts resulting from land clearing and infrastructure development.



- Requests were made for sustainable land-use management, water-efficient technologies, and environmental safeguards to protect biodiversity and livelihoods.

## **5. Social Inclusion and Vulnerable Groups**

- Women, youth, and other vulnerable groups (including elders and persons with disabilities) requested deliberate inclusion in consultations, benefit-sharing, and capacity-building programs.
- Stakeholders emphasized that participation mechanisms should ensure equal voice and access for marginalized groups who are often excluded from decision-making.

## **6. Community Resistance and Dissent**

- The most notable instance of resistance occurred in Kuzuntu, where traditional leaders and community members opposed the project's land allocation.
- Engagements were temporarily stalled until neutral mediators—including LGA council members and respected traditional leaders—facilitated dialogue, eventually leading to consensus and agreement for project access.
- This incident underscores the importance of establishing structured mechanisms for dissent and conflict resolution within the SEP and GRM.

### **14.4 Site-Specific Evidence of Consultations**

The consultations conducted during the ESIA were tailored to reflect the socio-cultural realities, land tenure systems, and specific community contexts of the two SAPZ project sites. While both locations expressed optimism about the opportunities the project may bring, concerns related to land acquisition, displacement, livelihoods, and trust were prominent. This section provides site-specific summaries of consultation events and outcomes.

#### **14.4.1 Kubau LGA (Agricultural Transformation Center – Kuzuntu–Dutsen-Wai)**

In Kubau LGA, consultations were held across Anchau, Dutsen-Wai, and Kuzuntu, focusing on sensitization, information-sharing, and addressing community concerns regarding the ATC site) as summarized on Table 14.4.1 and photos and attendances in the appendices section of the report). The engagements revealed a strong interest in the project's potential benefits, but also highlighted significant dissent in Kuzuntu due to mistrust from past land-related experiences.

- At Anchau and Dutsen-Wai, traditional leaders pledged their support for the project, noting its potential to transform agricultural livelihoods. However, they requested clarity on site location and equitable distribution of benefits.
- In Kuzuntu, consultations initially faced resistance. Community members raised issues around farmland displacement, resettlement, and mistrust of government-led projects, with some community leaders renegeing on earlier agreements.



- The matter was escalated to the Kubau LGA Council Chamber, where neutral mediators—comprising local government officials and respected traditional leaders—facilitated further dialogue. By the meeting of 30 July 2025, consensus was reached, and the community agreed to grant project teams access to the proposed site.

Pictures and attendances are available in the annexes section of this report

Table 14.1: Evidence of Consultation Events and Outcomes – Kubau LGA (ATC Site)

<b>Date</b>	<b>Venue</b>	<b>Stakeholders Engaged</b>	<b>Key Issues Raised</b>	<b>Response / Outcome</b>	<b>Mechanism for Dissent &amp; Resolution</b>
25/06/2025	Anchau, Kubau LGA	Traditional leader, ESIA team	Sensitization and introduction of consultant, ESIA activities, and SAPZ project overview.	Leader pledged his support for the project.	No dissent recorded; traditional leader committed to ongoing dialogue.
25/06/2025	Dutsen-Wai Kubau LGA	Traditional and community heads and ESIA team	Sensitization and introduction of consultant, ESIA activities, and SAPZ project.	Leaders pledged their support, but expressed hope that the project site would be located in Dutsen-Wai.	Clarification provided on project siting; assurances of inclusive benefits.
25/06/2025	Kuzuntu, Kubau LGA	Traditional leaders, community members and ESIA team	Introduction and sensitization on SAPZ and ESIA activities. Concerns raised on displacement, resettlement, and mistrust.	ESIA team assured minimal displacement and explained planned LRP/RAP measures to ensure fair resettlement and compensation.	Neutral dialogue platform established; issues documented for RAP follow-up; assurances provided.
05/07/2025	Kuzuntu, Kubau LGA	Traditional head of Kuzuntu and ESIA team	Community resistance to SAPZ project in the area.	ESIA team and SAPZ representatives sensitized the traditional	Engagement continued despite resistance; neutral mediators



Date	Venue	Stakeholders Engaged	Key Issues Raised	Response / Outcome	Mechanism for Dissent & Resolution
				heads on the project scope and safeguards.	proposed further dialogue.
22/07/2025	Council Chamber, Kubau LGA	LGA council members, Kuzuntu traditional heads, ESIA team, security agencies, SAPZ, community heads	Continued resistance from Kuzuntu community; some traditional heads did not attend.	Engagement noted low participation; dissent acknowledged and escalated.	Unresolved dissent escalated to LGA level for mediation with neutral actors
30/07/2025	Council Chamber, Kubau LGA	Kubau council members, traditional leaders, ESIA Team, SAPZ representatives, security agencies	Engagement convened to resolve dissent from Kuzuntu community.	Community agreed to allow project team access to the proposed site.	Dispute resolved through facilitated dialogue at LGA council; consensus achieved.

#### 14.4.2 Chikun LGA (Agro-Industrial Hub – Daki-Takwas / Sabon Birnin Kasarami / Gonin Gora)

In Chikun LGA, consultations were conducted across Gonin Gora Garden, Sabon Birnin Kasarami, and Daki-Takwas. (as summarized on Table 14.4.2, while photos and attendance are presented under appendices section) Unlike Kubau, resistance was less intense, but concerns remained focused on farmland displacement, resettlement, and livelihood security (Table 14.4.2)

- At Gonin Gora Garden, PAPs raised fears over resettlement and referenced unfulfilled promises from past projects. The ESIA team provided clarity on RAP/LRP procedures and grievance channels.
- In Sabon Birnin Kasarami, traditional leaders pledged support but consistently raised concerns about displacement of farmers on the proposed site. Subsequent consultations



(15 August 2025) included regulators (KEPA, FMEnv), which helped build trust and confirm safeguards.

- At Daki-Takwas, the traditional head expressed strong support, emphasizing the need to ensure employment opportunities for local community members once the hub is operational.

Table 14.2: Evidence of Consultation Events and Outcomes – Chikun LGA (AIH Site)

Date	Venue	Stakeholders Engaged	Key Issues Raised	Response / Outcome	Mechanism for Dis-sent & Resolution
19/07/2025	Gonin Gora Garden	Project Affected Persons (PAPs)	Concerns over <b>resettlement plans</b> and reference to failed promises from past experiences.	ESIA team sensitized PAPs on the proposed RAP/LRP processes, assuring them of fair and transparent handling.	Mechanism for grievance and feedback explained; PAPs encouraged to use GRM and RAP verification stages.
19/07/2025	Sabon Birnin Kasarami	Traditional leaders, community heads, PAPs	Sensitization on ESIA and SAPZ; concern raised over <b>farmer displacement</b> from proposed project site.	Leaders pledged support but requested fair compensation and alternative land for displaced farmers.	Concerns documented for RAP scoping; agreed to revisit through further consultations.
15/08/2025	Sabon Birnin Kasarami	Traditional head, ESIA team, SAPZ, KEPA, FMEnv	Collection of PAP list and project scoping; concerns on <b>displacement and mistrust</b> based on past experiences.	ESIA team assured minimal displacement and outlined RAP/LRP activities for adequate resettlement and compensation.	Engagement broadened with regulators (KEPA/FMEnv) to build trust; PAPs included in scoping exercise.



Date	Venue	Stakeholders Engaged	Key Issues Raised	Response / Outcome	Mechanism for Dissent & Resolution
15/08/2025	Daki-Takwas, Chikun LGA	Traditional head of Daki-Takwas, community heads	Sensitization and engagement on SAPZ project; request for <b>employment opportunities</b> for community members.	Leaders expressed support, with plea for local employment prioritization.	Employment inclusion raised to PIU for integration into community benefit-sharing framework.

#### 14.5 Mechanisms for Dissent and Conflict Resolution

Given the sensitivity of land acquisition, resettlement, and livelihood disruption associated with the SAPZ project, it was anticipated that dissent, grievances, and resistance would arise during consultations. The ESIA consultations confirmed this, particularly through the Kuzuntu incident, where sections of the community reneged on earlier agreements and openly resisted the project. This highlighted the importance of embedding culturally appropriate and structured mechanisms for dissent within the Stakeholder Engagement Plan (SEP).

#### Approach Adopted During ESIA Consultations

1. **Acknowledgment of Dissent:** All concerns raised, including resistance to project siting, mistrust of government, and fear of farmland loss, were documented and recognized as legitimate.
2. **Use of Neutral Mediators:** Where tensions escalated (e.g., Kuzuntu), local government council members, respected traditional leaders, and neutral intermediaries were brought in to facilitate dialogue. This built trust and avoided direct confrontation between project teams and aggrieved community members.
3. **Tiered Resolution Mechanism:** Disputes were escalated in stages – from community-level discussions, to LGA-level mediation, and finally to state-level platforms if needed. This aligns with the proposed Grievance Redress Mechanism (GRM) structure in the SEP.
4. **Transparency and Disclosure:** Communities were provided with clear explanations of RAP/LRP processes, compensation principles, and grievance channels to reassure them of fairness and accountability.

#### Case Example – Kuzuntu (Kubau LGA)



- During early consultations, Kuzuntu community members raised concerns about displacement and mistrust, with some traditional heads openly opposing the project.
- Engagement stalled until the matter was escalated to the Kubau LGA Council Chamber, where neutral mediators facilitated dialogue.
- After two rounds of council-level discussions (22 July and 30 July 2025), the community agreed to allow access to the project site, contingent on proper documentation of compensation and livelihood restoration commitments.
- This outcome demonstrated the effectiveness of structured, inclusive, and mediated conflict resolution pathways.

### **Institutionalization through the SEP and GRM**

Building on these lessons, the SEP provides formalized mechanisms for dissent through the Grievance Redress Mechanism (GRM), which ensures:

- **Accessibility:** Grievance channels (CLOs, drop boxes, toll-free lines, WhatsApp numbers, and local GRM committees) are open to all, including PAPs, women, youth, and vulnerable groups.
- **Transparency:** Each grievance is logged, tracked, and feedback is provided within defined timelines.
- **Neutrality:** Disputes that cannot be resolved at community level are escalated to LGA or SPIU level, with oversight from regulators (KEPA, FMEnv) and the AfDB if necessary.
- **Non-Retaliation:** Complainants are protected from retribution, ensuring that dissenting voices can be expressed without fear.

### **14.6 Lessons Learned from ESIA Consultations**

The ESIA consultations for the Kaduna SAPZ project generated valuable insights that have directly shaped the design of the Stakeholder Engagement Plan (SEP), the Resettlement Action Plan (RAP), the Livelihood Restoration Plan (LRP), and the Grievance Redress Mechanism (GRM). Key lessons learned include:

- 1. Early Engagement is Critical:** Initiating consultations during the ESIA phase allowed concerns about land acquisition, displacement, and livelihoods to be identified before project implementation, reducing the risk of escalated conflicts later.
- 2. Mechanisms for Dissent Must be Institutionalized:** The Kuzuntu incident demonstrated that communities may renege on earlier agreements due to mistrust or perceived risks. Embedding dissent mechanisms—such as neutral mediation, escalation to LGA councils, and documentation of outcomes—was essential to restoring trust and gaining social license to operate.



3. **Trust Deficit Requires Transparency and Documentation:** Many stakeholders referred to unfulfilled promises from past interventions. To rebuild confidence, every commitment related to compensation, livelihood support, and community benefits must be transparently documented and disclosed.
4. **Inclusion of Vulnerable Groups is Non-Negotiable:** Women, youth, and persons with disabilities consistently requested deliberate inclusion. Targeted approaches, such as separate focus group discussions and transport stipends for participation, are necessary to ensure equitable involvement in decision-making and access to project benefits.
5. **Integration of Regulators Builds Legitimacy:** The involvement of KEPA and FMEnv officials during Sabon Birnin Kasarami consultations increased community confidence that safeguards and compensation processes would be independently monitored and enforced.
6. **Linking Engagement to Tangible Benefits Strengthens Support:** Communities in Daki-Takwas and Sabon Birnin Kasarami emphasized employment and livelihood opportunities. Ensuring that job creation, training, and value chain participation are integrated into the SEP and RAP/LRP builds local ownership and reduces resistance.
7. **Continuous Feedback is Essential:** Engagement cannot be a one-off exercise. Communities expect ongoing dialogue, regular updates, and the ability to raise grievances throughout the project lifecycle. This has been embedded into the SEP through structured consultation schedules, reporting mechanisms, and the GRM.



## CHAPTER FIFTEEN: CONCLUSION

The Stakeholder Engagement Plan (SEP) for the Kaduna Special Agro-Industrial Processing Zones (SAPZ) represents a cornerstone of the project's sustainability and inclusivity framework. It provides a structured and participatory mechanism for communication, consultation, and feedback that ensures all stakeholder groups—particularly host communities, women, youth, and vulnerable persons—are actively involved in decision-making throughout the project lifecycle.

The SEP reinforces the project's commitment to transparency, accountability, and mutual respect among stakeholders. Through continuous engagement, it will help prevent conflicts, strengthen community trust, and ensure that environmental and social safeguards are effectively implemented in line with AfDB's Operational Safeguard 10 (OS10), IFAD's SECAP, and Nigeria's EIA regulatory framework.

Effective implementation of this plan will depend on the combined efforts of key institutions, including the Federal Ministry of Agriculture and Food Security (FMAFS), the National Project Coordinating Unit (NPCU), the Kaduna State Ministry of Agriculture, PIU, and the host Local Government Authorities (Kubau and Chikun LGAs)—supported by traditional councils, NGOs, and development partners such as AfDB, IFAD, and FAO.

Ultimately, the SEP seeks to build a foundation of shared ownership, ensuring that the Kaduna SAPZ delivers equitable benefits, promotes rural transformation, and contributes meaningfully to Nigeria's broader goals of food security, poverty reduction, and inclusive economic growth.



## Annexes

### 11.1 References

#### 1. National Laws and Regulations:

- Federal Republic of Nigeria. (1992). *Environmental Impact Assessment Act, Cap E12, Laws of the Federation of Nigeria 2004*. Abuja: Federal Government of Nigeria.
- Federal Republic of Nigeria. (1978). *Land Use Act, Cap L5, Laws of the Federation of Nigeria 2004*. Abuja: Federal Government of Nigeria.
- Federal Republic of Nigeria. (2007). *National Environmental Standards and Regulations Enforcement Agency (NESREA) Act*. Abuja: Federal Government of Nigeria.
- Federal Republic of Nigeria. (1993). *Water Resources Act, Cap W2, Laws of the Federation of Nigeria 2004*. Abuja: Federal Government of Nigeria.
- Federal Republic of Nigeria. (1990). *Factories Act, Cap F1, Laws of the Federation of Nigeria 2004*. Abuja: Federal Government of Nigeria.
- Federal Ministry of Environment. (2016). *National Policy on the Environment (Revised)*. Abuja: Federal Government of Nigeria.
- Federal Ministry of Environment. (n.d.). *EIA Sectoral Guidelines for Agriculture and Rural Development*. Abuja: Federal Government of Nigeria.

#### 2. Kaduna State Regulations and Policies:

- Kaduna State Government. (2018). *Kaduna State Environmental Protection Agency (KEPA) Law*. Kaduna: Kaduna State Government.
- Kaduna State Government. (n.d.). *Kaduna State Land Use Regulations*. Kaduna: Kaduna State Government.
- Kaduna State Ministry of Agriculture. (n.d.). *Kaduna State Agricultural Development Policy*. Kaduna: Kaduna State Government.
- Kaduna State Ministry of Environment and Natural Resources

#### 3. International Standards and Guidelines:

- African Development Bank (AfDB). (2013). *Integrated Safeguards System (ISS)*. Abidjan: AfDB.
- International Finance Corporation (IFC). (2012). *Performance Standards on Environmental and Social Sustainability*. Washington, DC: IFC.



Islamic Development Bank (IsDB). (2021). *Environmental and Social Policy*. Jeddah: IsDB.

International Fund for Agricultural Development (IFAD). (2017). *Social, Environmental, and Climate Assessment Procedures (SECAP)*. Rome: IFAD.

World Bank. (2018). *Environmental and Social Framework (ESF)*. Washington, DC: World Bank.

**4. Secondary Data and Studies:**

National Bureau of Statistics (NBS). (2023). *Kaduna State Socio-Economic Survey Report*. Abuja: NBS.

Kaduna State Ministry of Agriculture. (2024). *Annual Agricultural Performance Report*. Kaduna: Kaduna State Government.

Ahmadu Bello University (ABU). (2023). *Biodiversity and Agricultural Productivity in Kubau LGA, Kaduna State*. Zaria: ABU Press.

National Space Research and Development Agency (NASRDA). (2024). *Land Use and Land Cover Data for Kaduna State*. Abuja: NASRDA.

**5. Other Guidelines:**

Federal Ministry of Agriculture and Rural Development. (2016). *National Agricultural Policy*. Abuja: Federal Government of Nigeria.

African Development Bank (AfDB). (n.d.). *Guidelines for Agro-Industrial Projects*. Abidjan: AfDB.



Sl. No	NAME	POSITION	PHONE
1.	Musa Sale Bama	Chairman	09035571654
2.	Jafar Muhammad	V/Chairman	08031590740
3.	Jamilu A. Hashem	Comd. Sal	08084827412
4.	Habib Adamu Isa	ESIA Consultant	08067844798
5.	Yedaj Naman	ECCO, SAPZ	08033804878
6.	Israelius Felon	Maleki	0808163301
7.	Chroma Abubakar		
8.	WAKILU		
9.	AMU TUNJISA	ASTIN GOLF	
10.	ERIC IBRAHIM	"	
11.	Bello Garba	"	
12.	ABDU KARIM HARUNA	"	
13.	Tukur MATHA	S/A Community Affairs	08162209998
14.	ABDU ABO	"	
15.	AMUS IPPIS	JENNA	08089219395
16.	SALU RABIC	V/HEAD	08125131825
17.	Albert Doga	SALAM: ZIM	090740381
18.	Hamza A. Galana	Surveyor	0706291979
19.	Aliyu Ibrahim	Director	08055867899
20.	Usman Aliyu	S/C Agric	08069622273
21.	KASIRU ZUBAIRU	DSS	08068858097
22.	AKU DAKAWU	D G	08032914816
23.	IBRIS BELLO	MAHAMMADU	07036652698
24.	KABIRU WURU MURDE		07081774873
25.	LAWIYAH KATIR	Women Affairs	07080334143
26.	ABDUMUMINI TAY	ESIA Consultant	09075832974
			07032154700



Stakeholders Engagement Plan (SEP) for the Proposed Kaduna SAPZ Project (AIH and ATC)

Attendance for meeting with Kubau L.G.A @ Anichau: 2/07/2025

Sl. No	Name	Attendance	Phone	Sign
1	Must Sale Banki	Chairman	09035571654	<i>[Signature]</i>
2	Jafaru Muhammad	V/Chairman	08031590740	<i>[Signature]</i>
3	Salmanu Jaitfaku	SPEAKER	07087687766	<i>[Signature]</i>
4	Zaribu As. Hashim	CS, Kubau	08064227412	<i>[Signature]</i>
5	Abd. Haruna Cusagaja	Apk-Chairman	07084871344	<i>[Signature]</i>
6	KARIBU S. CURBIRU	B G	08032914480	<i>[Signature]</i>
7	Abulhaleem Ulluu Adau	Consultant	08067204337	<i>[Signature]</i>
8	Halib Adams Isa	consultant	08067544793	<i>[Signature]</i>
9	Yaqub Mansan	SAPZ	08033304370	<i>[Signature]</i>
10	ANAS JORIS	V/Chair	07125137826	<i>[Signature]</i>
11	Hariz A. GAZALI	DIASONE	08055767899	<i>[Signature]</i>
12	Rislarabe Abdulmuh.	D.D. Agric	08006212980	<i>[Signature]</i>
13	CSP MUKHTAR A. ALIYU	Apk Kubau	08035078009	<i>[Signature]</i>
14	Usman Muhammed	SIB Kubau	08069149499	<i>[Signature]</i>
15	Yakubu Yakubu	Chief Justice	07035599075	<i>[Signature]</i>
16	TANIMU HANZURU	Chief Anichau	08080864808	<i>[Signature]</i>
17	Abdulganiyu A.		08164982388	<i>[Signature]</i>
18	Ismail M. KABIR	DES	08148280240	<i>[Signature]</i>
19	Abdulrahman marafa	Admin KADUS	08034520337	<i>[Signature]</i>
20	Abdudu magasi	ZIC	08034363700	<i>[Signature]</i>
21	Abudu Ibrahim	SC Agric KB	08069628223	<i>[Signature]</i>
22	Yau Sadi	SC A-Finance	08030916502	<i>[Signature]</i>
23	Ishaq Waz Ishaq			<i>[Signature]</i>
24	Abdulqader Muhammad	S/A RELIGION	08025580257	<i>[Signature]</i>
25	Abdulmumin Yau	S/A media/mb	07081914320	<i>[Signature]</i>
26	Rabiu Samailo	Chief Jant	07032154700	<i>[Signature]</i>
		Chief Sakar	07040997795	<i>[Signature]</i>



**VILLAGE HEAD OFFICE, S/GARI KASARAMI**  
**GWAGWADA DISTRICT**  
Gbagyi Chiefdom, Kaduna State

Our Ref: \_\_\_\_\_

Date: \_\_\_\_\_

S/N	NAME	PHONE	SIGNATURE
1	Christopher Habila	09056050222	<i>[Signature]</i>
2	OO Gbapa	08052658250	<i>[Signature]</i>
3	Sunday Sami	08029798170	<i>[Signature]</i>
4	Adanu Tumin	08057800267	<i>[Signature]</i>
5	Elsha Rawa	09058912323	<i>[Signature]</i>
6	Banladi Toma	09043972534	<i>[Signature]</i>
7	Ishaya Sarki	09025354570	<i>[Signature]</i>
8	Elsha Toma	08087812205	<i>[Signature]</i>
9	LUCAS S ALAPITU	08059450931	<i>[Signature]</i>
10	Godfrey Atak	08138199055	<i>[Signature]</i>
12	Sunday Habila Sarki	08030616893	<i>[Signature]</i>
13	Ath. Garba Galachina	08032470188	<i>[Signature]</i>
14	Thing MARKUS	07035818181	<i>[Signature]</i>
15	Sylvester Camilla Goro	08130315246	<i>[Signature]</i>
16	ENGR. BATO OKEDIRAN	08030435411	<i>[Signature]</i>
17	YANGA BITKUS (RCV)	08022322855	<i>[Signature]</i>
18	YASHIM LUKA (PRES. ATUBA-LUKA)	08067651667	<i>[Signature]</i>
19	ESAH DOGARA AGWAK	08029641990	<i>[Signature]</i>
20	Samuel Meisango	09070707072	<i>[Signature]</i>
21	Solomon Babo Sodangi	08033143645	<i>[Signature]</i>



ATTENDANCE 19/07/2025  
Stakeholders Engagement

S/N	NAME	Phone No.	Signature
①	Chief Solomon Dabo Sadaungu	08033143645	
(2)	YASHIM LUKA	08067651667	
3.	Isah Dogara Agwax	08029641990	
4	Engr. BAYO OKEDIRAN	08030435411	
5	Ah. Garba Gelaolima (CP Rtd)	08030470188	
6	YANGA Bitrus (Rtd)	08022322855	
7	Godfrey Attah	08138199055	
8.	LUCAS SARAHI ALAPHU	08059450931	
9.	EMMANUEL SARKI HABILA	08072996787	
10	Sunday Habila Sarki	08030616893	
11	Ilins Markus	07035818181	
12	Samuel Maisango	09070707072	



**VILLAGE HEAD OFFICE, S/GARI KASARAMI**  
**GWAGWADA DISTRICT**  
 Gbagyi Chiefdom, Kaduna State

Our Ref: \_\_\_\_\_

Date: \_\_\_\_\_

S/N	NAME	PHONE	SIGNATURE
1.	Christopher Habila	090 56050 222	
2.	Garba Galadima	080 52658250	
3.	Sunday Sauri	080 29798170	
4.	Adamu Tuma	080 57200267	
5.	Elisha Bawa	090 58912323	
6.	Danladi Toma	090 43982534	
7.	Ishaya Sarki	090 25354570	
8.	Elisha Toma	080 87812205	
9.	LUCAS S ALAPITU	080 59450931	
10.	Godfrey Attah	08138199055	
12.	Sunday Habila Sarki	08030616893	
13.	Ali Garba Galadima	08032470188	
14.	Thing Markus	07035818181	
15.	Sylvester Samaka Yarso	08130315246	
16.	ENGR. BATO OKEDIRAN	08030435411	
17.	YANGA BITRUS (RCP)	08022322855	
18.	YASHIM LUKA (REPS. ATUBATUKA)	08067651667	
19.	Isah Dogara Agwara	08029641990	
20.	Samuel Meisango	09070707072	
21.	Solomon Dabo Sodangi	08033143645	



# VILLAGE HEAD OFFICE, S/GARI KASARAMI GWAGWADA DISTRICT Gbagyi Chiefdom, Kaduna State

Our Ref: Sabin Gari

Date: 10/07/2025

- SN
1. ALHaji GAREM GULADIM - 08035990593 08032470188 ✓
  2. ALHaji ABDULLAH MOHAMMED - 08069299118 ✓
  3. BIRUSI YAN GARI - 08022322855 ✓
  4. CATHERINE DANLAWA - 08137089976 ✓
  5. <sup>ILYA</sup> DANLAWA MARKUS DANLAWA - 07035818181 ✓
  6. DO GARI A GIDAN - 08025260295 ✓
  7. ENGR. BOYO OKEDI RANT - 08030435411 ✓
  8. ELISHA BAWA - 09058912323 ✓
  9. DIKKA BAWA GINJERE - 08187557715 ✓
  10. ISAH DO GARI - 08029641990 ✓
  11. ISHAYA HABILA - 08051078488 ✓
  12. SUNLAWA SAURU - 08052658250 ✓
  13. ISHAYA ISHAYA - 09164242422 ✓
  14. <sup>ADAM</sup> LUKA MUSTA (A.H. IBRAHIM) - 080226037 ✓
  15. LUKA YASHIM - 07033643816 ✓
  16. MADAM - 09056050222 ✓
  17. ANA HANAU TANU - 08031525296 ✓
  18. MR/MRS D. OMABEL BAWA - 08030616893 ✓
  19. ~~MUSA~~ ADAMUS 056050222 - 08031525296 ✓
  20. SUNLAWA HABILA - 08030616893 (Group WhatsApp) ✓
  21. DR. MRS RUTH NASLA - 07067653849
  22. SAMUEL EMMANUEL MAI SAN GARI - 08080808092 ✓
  23. SAMUEL EMMANUEL MAI SAN GARI - 08080808092 ✓
  24. SARKI CHRISTOPHER - 09056050222 ✓
  - AMOS NUFA - 09129174630 ✓
  - YOHANNA ISIFANUS - ✓
  - USUN ~~ADAM~~ - 08036821860 ✓
  25. SARKI HABILA / ~~BIRUSI~~ SALE - 08072996787 ✓
  - BIRUSI SALE - 09074372421 ✓
  - EMMANUEL ~~DANLAWA~~ - 07056647821 ✓
  - ELISHA GULADIM - 08079508902 ✓
  26. SILVESTER SAMUKA YARO - 07033848203 ✓
  27. SIMON UMAR - 08088833091 ✓
  28. SCHOLON SODANGI DABO - 08033143645 ✓
  29. ABIN YASHIM - 08060901290 ✓



### Stakeholder Register for SAPZ Project – Kaduna State

S/N	Stakeholder Name	Organization/Group	Stakeholder Type	Contact Person	Contact Details	Location	Level of Interest	Level of Influence
1	Kaduna State Ministry of Agriculture	Government	Regulator / Implementer	Hon. Commissioner		Kaduna City	High	High
2	Kaduna State Environmental Protection Authority (KEPA)	Government	Regulator	Director of EIA		Kaduna North LGA	High	High
3	Federal Ministry of Environment (FMEnv)	Government (Federal)	Oversight	EIA Desk Officer		Abuja	Medium	High
4	African Development Bank (AfDB)	Development Partner	Financier / Oversight	Project Task Manager		Abidjan / Nigeria Office	High	High
5	Kubau Local Government Council	Local Government	Local Authority	Council Chairman		Anchau, Kubau LGA	High	Medium
6	Community of Kuzuntu–Dutsen-Wai	Project-Affected People (PAPs)	Local Community	Village Head		Kuzuntu, Kubau LGA	High	Medium
7	Traditional Council, Chikun LGA	Local Traditional Institution	Local Community Leader	District Head		Daki-Takwas, Chikun LGA	High	Medium



Stakeholders Engagement Plan (SEP) for the Proposed Kaduna SAPZ Project (AIH and ATC)

S/N	Stakeholder Name	Organization/Group	Stakeholder Type	Contact Person	Contact Details	Location	Level of Interest	Level of Influence
8	Kaduna State Ministry of Women Affairs	Government	Social Development	Director, Gender Unit		Kaduna City	Medium	Medium
9	Farmer Cooperative Association, Kubau	Local Group	Beneficiary Group	Chairman		Kubau LGA	High	Low
10	Women in Agriculture Network (WOFAN)	NGO	Civil Society	Program Manager		Kaduna South	Medium	Medium
11	Youth Agro Entrepreneurs Forum	Youth Group	Civil Society	President		Kaduna Central	High	Low
12	Kaduna Investment Promotion Agency (KADIPA)	Government	Investment Facilitation	Managing Director		Kaduna City	Medium	High
13	Kaduna State Water Corporation	Government	Utility Provider	Area Manager		Kaduna Metropolis	Medium	Medium
14	Civil Society Coalition on Agriculture	CSO Network	Advocacy	Coalition Coordinator		Kaduna Central	Medium	Medium
15	Local Journalists / Media Outlets	Media	Information Dissemination	Editor		Statewide	Medium	Medium



**SAPZ Project – Stakeholder Consultation Log Template**

S/N	Date	Location / Venue	Stakeholder Group	Participants (Names & Roles)	Means of Engagement	Issues Raised / Discussion Points	Responses / Agreements Reached	Follow-Up Actions	Responsible Party	Contact Details	Sig-nature
1											
2											
3											
4											
5											



Stakeholders Engagement Plan (SEP) for the Proposed Kaduna SAPZ Project (AIH and ATC)

---





**Type of Grievance (check all that apply)**

- Compensation
- Livelihood restoration
- Environmental impact
- Social impact
- Employment
- Health and safety
- Cultural heritage
- Others (specify): \_\_\_\_\_

**Description of Grievance**

(Please describe the nature of your grievance, including dates, location, people involved, and any supporting evidence.)

**3. Actions Taken (To be completed by project team)**

**Date of Investigation**

**Investigator's Name / Role**

**Findings / Summary of Investigation**

**Resolution Proposed**

**Date Resolution Communicated to Complainant**

**Complainant's Response**  Accepted  Rejected

**If Rejected, Proposed Next Steps**

**4. Signature and Confirmation**

**Complainant's Signature** \_\_\_\_\_

**Date** \_\_\_\_\_



**Complainant's Signature** \_\_\_\_\_

**Name of Receiving Officer** \_\_\_\_\_

**Signature** \_\_\_\_\_

**Date** \_\_\_\_\_

**Capacity Building Activity Plan Table – SAPZ Project, Kaduna State**

S/N	Training Topic	Target Audience	Frequency	Responsible Party
1	Stakeholder Engagement Principles & AfDB Operational Safeguards	PIU, LGA Officers, CLOs, Consultants	Bi-annually	PIU/Environmental & Social Safeguards Specialist
2	Community Engagement & Communication Skills	Community Liaison Officers (CLOs), CSOs, Youth/Women Leaders	Quarterly	PIU/Social Specialist
3	Grievance Redress Mechanism (GRM): Roles, Procedures & Recordkeeping	CLOs, Traditional Leaders, Community Grievance Committees	Quarterly	PIU/Social Safeguards & Legal Advisor
4	Gender, Social Inclusion, and GBV/SEA Response	PIU, Contractors, CLOs, Community Focal Points, Women/Youth Groups	Semi-annually	PIU/Gender & GBV Consultant
5	Environmental & Social Risk Management	PIU, Contractors, Supervising Engineers, KEPA, FMEnv Reps	Annually (and as needed)	PIU/Environmental Specialist
6	Land Acquisition, RAP, and Livelihood Restoration Protocols	LGA Land Officers, RAP Committee, PIU, Community Representatives	Prior to RAP implementation	RAP Consultant / PIU-Livelihood Specialist
7	Monitoring, Evaluation & Stakeholder Reporting	PIU M&E Team, CLOs, LGA Monitoring Teams	Quarterly (Review & Refresher)	PIU/M&E Specialist



S/N	Training Topic	Target Audience	Frequency	Responsible Party
8	Conflict Sensitivity and Mediation Techniques	CLOs, Community Leaders, LGA Representatives	Every 6 months	PIU/Social Development Consultant
9	Occupational Health, Safety, and Community Safeguards	Contractors, Workers, CLOs, Local Vigilantes, Host Communities	Monthly Toolbox Talks	Contractors' HSE Officers / PIU HSE Manager
10	Information Dissemination Using Local Tools	CLOs, LGA IEC Officers, CSOs, Local Media	Before each project phase	PIU/Communications Officer

**Notes:**

- All trainings will be delivered in English and Hausa, using participatory methods (role-play, case studies, simulations).
- Trainings will be tracked with attendance sheets, pre/post-test scores, and evaluation forms.
- Refresher sessions will be conducted based on performance review or as triggered by grievance trends or stakeholder requests.