



ENVIRONMENTAL AND SOCIAL REVIEW SUMMARY: PUBLIC DISCLOSURE

Environmental and Social Review Summary: Lagos Free Zone Company

Country	Nigeria
Sector	Urban Infrastructure, Transportation
Project Company	Lagos Free Zone Company
Transaction type	Greenfield Expansion of Existing Operations
Transaction value/tenor	NGN 15 billion/ up to 20 years
Project Sponsor	<ul style="list-style-type: none"> Lagos Free Zone Company (LFZC) Limited Eurochem Corporation PTE Limited Tolaram Group
Environmental and Social Category	Category A
Date ESRS Disclosed	12 February 2021
Status of E&S Review	<ul style="list-style-type: none"> Sponsor has conducted an Environmental and Social Impact Assessment (ESIA) InfraCredit has completed an Environmental and Social Due Diligence (ESDD)

This Environmental and Social Review Summary (ESRS) is prepared by InfraCredit's Environment and Social Team and disclosed prior to the date on which InfraCredit's Board Committee considers the proposed issuance of a Contract of Guarantee. The objective of this disclosure is to enhance the transparency of InfraCredit's activities. This document should not be construed as presuming the outcome of the decision by InfraCredit's Credit Committee.

Any documentation that is attached to this ESRS has been prepared by the Project Sponsor, and authorization has been given for public release. InfraCredit has reviewed the attached documentation as provided by the applicant and considers it of adequate quality to be released to the public but does not endorse the content.

An Environmental and Social site visit was conducted during due diligence phase of the transaction review process. If there is substantial change to information provided in the ESRS, disclosure time will be restarted in accordance with InfraCredit's Environmental and Social Policy.

A. Project Description

The Lagos Free Zone Company (LFZC) is a free trade zone development and management company responsible for the Lagos Free Zone (LFZ), registered with the Nigeria Export Processing Zone Authority (NEPZA). LFZC was incorporated in October 2002 and is the first privately-owned free trade zone in Nigeria, with over 830 hectares of land and designated industrial zones in the Ibeju-Lekki area of Lagos.

LFZC is developing a wide range of state-of-the-art facilities and services for the zone which includes roads, piped gas supply network, treated water supply network, street lighting and storm water

drainage network. Furthermore, LFZC intends to setup a power plant, desalination plant, solid waste management facilities, effluent treatment plants, sewage treatment plants, warehouses, standard industrial facilities (SIFs), housing units, truck park(s), medical centre, fire station, and a central police command as part of its measures to attract new investors/operators.

Also, LFZC intends to invest in information-technology enabled solutions as part of efforts towards establishing Nigeria's first smart industrial/logistics hub in Africa.

The development of the LFZC comes on the back of the development of Lekki Port which upon completion, will be the deepest seaport in Nigeria. The financial closure of Lekki Port has been successfully concluded and full-scale construction is currently ongoing. Thus far, the Sponsor (Tolaram) has invested over NGN200 billion in the project, (funded through 90 percent equity and 10 percent debt) towards the acquisition of land, investment in the Lekki Port, construction of basic infrastructure and acquisition of all the necessary operational permits and licenses.

LFZC seeks to raise up to NGN50 billion in tranches of NGN10 to NGN15 billion of up to 20 years tenor from the debt capital markets as a first series to refinance construction finance loans deployed towards the development of the infrastructure facilities including roads, pipelines networks, water treatment facilities, streetlights, and warehouses as part of the Lagos Free Zone project.

B. Environmental and Social Categorisation

Under InfraCredit's internal environmental and social review process, projects are categorized in terms of the International Finance Corporation (IFC) Sustainability Framework Policy (2012), as either Category A, B, or C according to the following criteria¹:

- Category A: Projects expected to have significant adverse environmental or social risks and/or impacts that are diverse, irreversible, or unprecedented.
- Category B: Projects expected to have limited adverse environmental or social risks and/or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures.
- Category C: Projects expected to have minimal or no adverse environmental or social risks and/or impacts.

This categorization framework is used for the LFZC Project in this Assessment. The LFZC Project involves the construction and operation of a Free Trade Zone (FTZ), covering over 830 hectares of land. The key significant environmental and social issues associated with the Project include resettlement and livelihood restoration for project affected persons (PAPs), terrestrial and aquatic habitat alteration and biodiversity, hazardous materials and oil management, occupational health and safety, waste generation and management, air emissions, noise and vibration (including underwater), community health and safety including road traffic issues.

Given the characteristics above, the Project involves activities with potential for significant adverse environmental and social (E&S) risks and/or impacts. These risks are diverse, some are irreversible

¹ This categorisation is consistent with framework of the African Development Bank (AfDB) Operational Safeguards (Category 1 (High Risk), Category 2 (Medium) and Category 3 (Low))

(e.g., risk of fatalities) and unprecedented. Activities are not unprecedented on a global basis but are locally, for instance, coastline erosion. Therefore, the Lagos Free Zone Project is classified a Category A as defined by IFC Policy on Environmental and Social Sustainability. This categorisation is consistent with projects of similar scope and scale.

The development impacts of the Project include:

- Unlocking capital and enabling the Sponsor's further re-investment into the local economy through the development of the Lekki Port Dry Bulk Terminal
- Creation of over 2,000 jobs and an estimated 30,000 direct and indirect jobs in 10 years. In addition to this, additional employment will be generated by Lekki Port.
- Provision of social infrastructure services (housing, roads, water supply) for investors, employees and local residents, as well as the wider community in Ibeju Lekki
- Improved access to Nigeria's economy through an integrated hub with active road, rail and sea links.

Information on how these E&S issues are, or will be, addressed by LFZC to comply with InfraCredit's Environmental and Social Policy² and Applicable Standards and Guidelines is presented in the sections below.

C. Applicable Standards

The assessment was conducted in line with the following international standards and applicable Nigerian environmental and social regulations in force at the time of study:

- InfraCredit's internal environmental and social policies and procedures;
- IFC Performance Standards on environmental and social sustainability (2012) and related policies;
- African Development Bank Integrated Safeguards System
- Equator Principles IV (2020); and
- World Bank Group environmental, health and safety (EHS) guidelines:
 - General EHS guideline (2007)
 - EHS guideline for ports, harbours and terminals (2017).

Based on information available during the assessment of the Project, the following Performance Standards (PS) are applicable and identified impacts will address based on their requirements:

- PS1: Assessment and Management of Environmental and Social Risks and Impacts
- PS2: Labour and Working Conditions
- PS3: Resource Efficiency and Pollution Prevention
- PS4: Community Health, Safety and Security
- PS5: Land Acquisition and Involuntary Resettlement
- PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resource

² InfraCredit E&S Policy is developed based on the requirements of national legislation and international standards such as the IFC Performance Standards and the AfDB Operational Safeguards.

E&S issues associated with these PSs were not encountered during the assessment of the Project:

- PS7: Indigenous Peoples – is not expected to be triggered as the project does not adversely affect any Indigenous Communities, as defined by PS7.
- PS8: Cultural Heritage – is not triggered as consultation with local regulatory organizations and the review of available records undertaken as part of the Environmental Impact Assessment (EIA) process did not identify any known sites of archaeological or cultural heritage value within the Project site boundaries. However, a “Chance Finds” procedure will be developed for the construction phase of the project, consistent with PS8.

D. Key Documents and Scope of InfraCredit’s Review ³

The following documents were reviewed by InfraCredit:

S/N	Document Title
1	Lagos Free Zone Company Directors
2	Lagos Free Zone Operating License
3	Lagos Free Zone Company Corporate structure
4	Lagos Free Zone Company Shareholding 2020
5	Tolaram Group Inc. 2018 Financial Report
6	Directors’ and Management Profile
7	Lagos Free Zone Company Memorandum of Association
8	Drainage Agreement between Lagos Free Zone and Rima Civil & Infrastructural Engineering Nigeria LTD. 2020
9	Lagos Free Zone Annual reports and Financial Statement 2015 – 2019
10	Leases and Other Agreement <ul style="list-style-type: none"> • Deed of Sublease between Lagos Free Zone and KT LFTZ Enterprise • Medical Retainership between Lagos Free Zone and Lekki Port LFTZ Enterprise Limited, 2020 • Warehouse Lease Agreement between Free Zone Utilities LFTZ Enterprise and Arla Dairy Products LFTZ Enterprise, 2020
11	Borrowing Details
12	Feasibility Report
13	Integrated Petrochemicals Industrial Complex Final EIA Report, 2004
14	Draft Lagos Free Zone EIA Report, 2015
15	Final Lagos Free Zone EIA Report, 2019
16	Project Overview
17	Stakeholders Engagement Procedure
18	Lagos Free Zone EIA Approval letter (2019)
19	Lagos Free Zone Standard Operating Procedures, 2020

³ InfraCredit engaged an external E&S Consultant for the due diligence.

S/N	Document Title
20	Draft Standard Operating Procedure, 2018
21	Lagos Free Zone Health, Safety, and Environment Manual
22	Emergency Response Plan
23	Permit to lay Pipelines issued by Ministry of Transportation, 2020
24	Employee Handbook
25	Land Documents <ul style="list-style-type: none"> • Addendum to Certificate of Occupancy, 5.122H, 2012 • Addendum to Certificate of Occupancy, 79.933 + 120.361H, 2012 • Certificate of Registration of 9.82H issued by Lagos State Government, 2011 • Certificate of Occupancy of 9.82H issued by Lagos State Government, 2002 • Certificate of Occupancy of 5.122H issued by Lagos State Government, 2004 • Certificate of Occupancy of 590H issued by Lagos State Government, 2015 • Certificate of Occupancy of 70.933 + 120.361H issued by Lagos State Government, 2002 • Governor's consent to 9.82H, 2010
26	Lagos Free Zone Financial Model
27	LFZ Draft Demand Assessment and Positioning Report, 2018
28	Application for Change in Company Statutory Information – Change of Name

Formal documentation was supplemented by various email exchanges and conference calls with the Project Sponsor (including E&S Personnel). An Environmental and Social Action Plan (ESAP, to be attached to this ESRS) has been developed to address gaps between the current project documentation/performance and the requirements of the PSs.

E. Key Issues and Mitigation

PS1: Assessment and Management of Environmental and Social Risks and Impacts

Environmental and Social Assessment: The following EIA studies have been conducted for the Project:

- EIA for the Integrated Petrochemicals Industrial Complex by Lekki EPZ Limited, August 2004
- EIA of Lagos Free Zone (Additional Development) May 2019
- EIA Addendum of Lagos Free Zone (yet to be approved.)

Applicable Environmental Impact Assessment Reports (EIAs) has been prepared for the Project. The EIA describes the project activities, provides physical and environmental baseline information and socio-economic baseline information, identifies and assesses environmental and social risks and impacts during preparation, construction and operations phases, and proposes measures to mitigate adverse environmental and social risks and impacts.

As part of the Project's EIA, the potential impacts of workers (including third-party workers) within the area of influence were assessed across the various phases of the Project. Management and mitigation measures have also been developed as part of the environmental management plan (EMP), including audit and reporting requirements.

The Project is in the process of preparing a Resettlement Action Plan (RAP) for an affected community (Alasia community) located within LFZ boundary. The RAP will include a socio-economic baseline, a description of the legal framework and institutional arrangements, the consultation process, an entitlement matrix and plan for monitoring and evaluation or the implementation. Further details are explained under PS5 section below.

Management Program and Monitoring: The Project is in the process of developing an integrated environmental and social management system (ESMS). This process is expected to be completed by the end of 2021. As gathered during interviews with top management representatives of LFZC, the ESMS will be based on the requirements of the IFC Performance Standards, ISO 14001:2015 and ISO 45001:2018.

LFZC, being the developer of the Free Zone, plays a supervisory role in ensuring that the overall Project performance, including E&S performance is sustained. There are already a few operational facilities (LFZC Enterprises) within the Zone and several other Enterprises will establish their businesses within the Zone as the Project progresses. The EIA includes an Environmental Management Plan, outlining strategies for management and monitoring during the construction and operation phases. The EMP includes a description of the legislative requirements and outlines separate monitoring programmes for the construction and operations stages.

Organisational Capacity and Competency: LFZC has a well-established sustainability department. Implementation of the ESMS will be led by the Head of Sustainability department with support from other team members. The various Enterprises within the Zone also have internal resources that are responsible for E&S performance related to their operations.

Interview with top management representatives, including the Head of Sustainability indicates that the personnel with direct responsibility for the Project's E&S (including OHS) performance have the required knowledge, skills and experience necessary to perform their work. The sustainability team has good knowledge of the working requirements of IFC Performance Standards and AfDB Operational Safeguards.

LFZC engages the services of external experts to ensure adequacy in the process of identification of risks and impacts. Some of the external experts engaged by LFZC in this regard include:

- Global Environmental Technology Limited – engaged by LFZC to conduct EIA studies.
- TREVI Foundation Nigeria Limited – engaged by LFZC to conduct Geotechnical Investigations for the Project.
- Pigeon Innovative Solutions LLP - engaged by LFZC to conduct Topography Study for the Project.
- Surbana Jurong – engaged by LFZC to develop conceptual masterplan and infrastructure planning
- Aludra Consulting Pte Ltd – engaged by LFZC to review technical aspects of project.

Monitoring and Review: LFZC has periodic monitoring and review system in place. The ESAP contains recommendations for achieving the action item, which is associated with the development of the ESMS.

Emergency Preparedness and Response: LFZC has a documented Emergency Response Plan (ERP).

The key aspects covered in the plan:

- Evacuation instructions
- Evacuation plan
- Return to work
- Reporting and investigation of incidents
- Hazards control
- Roles and responsibilities

Emergency response activities is overseen by the Head of sustainability department. Specifically, for fire emergencies, LFZC has established a firefighting station within the zone that is equipped with personnel (27 in total) and equipment including two (2) fire trucks to facilitate quick response to emergency situations.

Individual facilities within the zone are also equipped with emergency response equipment such as fire hydrant systems and extinguishers.

Stakeholder Engagement: In addition to consultation with project affected communities (PACs) during the EIA studies, LFZC has also developed a stakeholder engagement plan (SEP). Implementation of the SEP will ensure that consultation with relevant Project stakeholders is sustained on an ongoing basis.

The key components of LFZC's SEP are:

- Stakeholder identification,
- Roles and responsibilities
- Stakeholder engagement program
- Grievance and conflict resolution mechanism
- Monitoring and reporting requirements

The supporting documents developed together with the SEP include a grievance redressal form, consultation records and stakeholder engagement log. LFZC will need to ensure adequate documentation of proceedings during consultation with relevant stakeholders, including PACs.

PS 2: Labour and Working Conditions

Human Resources Policies and Procedures: LFZC's employee handbook complies with the general principles of freedom of association, privacy and equal employment opportunities. LFZC offers a sound worker-management relationships and enhance the development benefits of the project by treating workers in the project fairly and providing safe and healthy working conditions.

Working Conditions and Term of Employment: LFZC has an employee handbook in place that describes employment categories, general conditions, benefits, and professional conduct. The manual is consistent with local regulations and the requirements of PS2 and AfDB OS 5, and includes non-discrimination and equal opportunity, minimum employee age requirement (18 years

of age), compensation, working hours and overtime allowances, as well as an employee grievance mechanism. LFZC has a whistle blower policy in place for reporting of unethical issues. This policy also allows anonymous reporting.

In addition to salary, employees receive additional benefits that include paid annual leave and recognized public holidays; a pension scheme; various life and medical insurance benefits for employees along with paternity leave, maternity leave, casual leave, compassionate leave and sick leave.

Non-discrimination and Equal Opportunity: LFZC provides equal opportunities to all employees and eligible candidates for employment, training, promotion, or other opportunities related to employment in the Company. Discrimination, harassment, or intimidation of any form based on gender, race, colour, creed, caste, religion, nationality, disability, marital status, pregnancy, sexual orientation, culture, socio-economic status, or any other characteristic protected under applicable laws of land and international conventions, or which violates the policies of the Company is completely prohibited.

In practice, this means that:

- When recruiting, developing, and promoting employees, decisions will be based solely on performance, merit, competence and potential
- LFZC pays fair rates, wages, and salaries, as well as recognize and reward meritorious service.
- LFZC use inclusive, diversity-sensitive language in all official documents and communications.

Retrenchment: Retrenchment refers to situations where LFZC no longer require the services of an employee within the company and no specific reason is assigned to it. It may also refer to redundancies or layoffs that may be necessary if LFZC cease some of operations or re-assign job duties within teams.

Retrenchment is not expected for this project. However, in case of retrenchment, LFZC will develop a retrenchment plan following applicable laws regarding notice and payouts, and LFZC will offer severance pay to eligible employees.

Grievance Mechanism: LFZC strives to maintain a good relationship with all stakeholders. There is a grievance redress mechanism that details how grievances from any stakeholder will be addressed. All the grievances are formally recorded and LFZC is committed to addressing every grievance on a fair and equitable basis.

Protecting the Work Force: LFZC prohibits the hiring of workers below 18 years, and LFZC does not use forced labour in any form. These requirements also apply to all LFZC's contractors and sub-contractors. LFZC ensures that contractors meet all regulatory requirements and applicable LFZC Environment, Health and Safety (EHS) Code of Conduct for Contracts.

Occupational Health and Safety (OHS): LFZC has an Occupational Health and Safety Policy, and the policy stipulates that LFZC will ensure compliance in line with the requirement of occupational health and safety per applicable national laws, codes, standards, and sound practices always. LFZC gives an utmost importance to occupational health and safety as one of the non-negotiable values for

conducting business. LFZC has adopted life-saving safety rules which need to be always complied with.



Figure 1: Life Saving Safety Rules

Occupational health and safety matters are included in the LFZC EHS Code of Conduct for Contracts. Activities are subject to hazard identification and risk assessment to ensure that OHS controls to manage risk are in place prior to starting the activity and necessary competency requirements for roles are specified.

Risks that cannot be avoided will be managed through proper administrative control, adequate enforcement of the use of personal protective equipment (PPE) and detailed job safety analysis (JSA). Contractors are required to follow all rules and regulations set out in the EHS Code of Conduct for Contracts, nominating a safety officer with responsibility for OHS matters, as well as providing training to all workers on OHS aspects relevant to their daily work and emergencies.

The EHS Code of Conduct for Contracts includes the emergency preparedness plan, permit-to-work, safe work instruction, incident management system, crane safety, working at heights and vehicle safety, enforcing the use of personal protective equipment, the observation of traffic safety protocols, training, and awareness for employees.

PS 3 – Resource Efficiency and Pollution Prevention

LFZC recognizes that economic activity often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. Risks and impacts are related to air emissions, noise, soil erosion and runoff, surface and ground water quality, waste, hazardous materials, and spills will be managed through project design and mitigation measures provided in the EIA and EMP, and implemented by contractors.

Air quality and noise levels: Air quality and noise baselines conditions have been measured within LFZC. Air quality parameters are below national limits. Operation of heavy vehicles and transportation will cause noise emissions, mainly during construction and to a lower extent in operations phase from maintenance activities. Construction machinery will also cause air emissions from fugitive dust generated from construction works, and gaseous emissions. The Project plans to conduct a Climate Risk Assessment to assess risks from the project.

Water and soil quality: The physico-chemical properties of soil within LFZC are generally good and indicate very low amounts of pollution (heavy metals and hydrocarbons), well within applicable national and WBG EHS guidelines. Surface quality water has very low or undetectable concentrations of heavy metals and other parameters are within WBG EHS guidelines, indicating an unpolluted aquatic ecosystem.

Expected impacts on soil and terrain are mainly related to erosion and compaction and will arise from site preparation, transportation, and operation of vehicles and machinery. Soil and water contamination may arise from fuel or lubricant leaks, improper disposal of waste, and accidents. The risks will be mitigated via maintenance of vehicles, and waste management routines as described in waste management plans, which are in place for both construction and operations phase. LFZC will ensure compliance with the requirements of IFC Performance Standards, and AfDB Operational Safeguards and WBG EHS Guidelines.

Hazardous Materials: Potential impacts related to hazardous materials include oily rags, leaks of fuels, oil, hydraulic fluids and other chemicals. The risk is managed through appropriate storage containers, during maintenance of vehicles and storage and use of hazardous materials.

PS 4 – Community Health, Safety and Security

Community Health and Safety: Risks to community health and safety include traffic accidents, construction, and accidents, communicable diseases and other health and safety issues related to immigrant workers during construction phase.

The normal operations at LFZC have limited impacts to the communities nearby based on the E&S impact assessments.

Security Personnel: LFZC is in the process of developing a security master plan. However, LFZC engages an external company for site security that conduct routine ID checks at the gates and security monitoring. LFZC also uses armed government security forces (GSF). All security personnel

are required to undergo five-man days security training per calendar year and on Voluntary Principles on Security and Human Rights (VPSHR). All security personnel provided by the external company go through a robust background check process before they are engaged.

Community Engagement: LFZC recognizes the importance of open and transparent engagement between LFZC and community as an essential element of good international practice. Effective community engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. LFZC conducts formal community engagement meeting twice in a year apart from routine interactions with community leaders, youths and other groups.

PS5: Land Acquisition and Involuntary Resettlement

LFZC is being developed on about 830 hectares. The only community which requires resettlement is Alasia community. Lagos State Government has already identified relocation land of approximately 15 hectares around 500m away from LFZ eastern boundary.

LFZC is in the process of preparing a resettlement management plan for resettlement of Alasia community. The RAP will cover resettlement process complying with applicable Nigerian laws and regulations, as well as Performance Standard 5 and Operational Safeguard 2; compensating PAPs at full replacement cost; treating occupancy rights as ownership, compensating “encroachers” for affected assets, paying compensation in full prior to occupation of land/asset, extending grievance procedures accessible to all PAPs; establishing systems for monitoring and evaluation.

PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resource

A survey of flora was carried out as part of the EIA, identifying 94 species of vegetation comprising trees, shrubs, herbs, and palm. None of the identified species are classified as endangered within the zone footprint. The vegetation in this area is a secondary type because of extensive bush clearing and landfills due to construction works. A large portion of the area is predominantly covered by grasses, and herbaceous species interspersed with some shrubs and trees.

The plant species found in nearby area around LFZ are colonizing and invasive species, as well as some economic plants because of the human community. The area has been impacted by human activities through human settlements and farming, therefore, economic plants, such as ornamental plants, medicinal plants, and food crops are found in the area.

The fauna found in the nearby area around LFZ are invertebrates, reptiles, birds and mammals. Generally, the invertebrate groups consist of several arthropod groups including butterflies, moths, dragon flies, water boatman, beetles, praying mantis, grasshoppers, spiders, ants, termites and molluscs.

The reptiles found in nearby area around LFZ are lizards, monitor lizards, pythons, and venomous snakes. The mammals are rats, grass cutters, goat, sheep and cattle. The animals observed also includes a variety of birds seen hovering over coastal areas and nearby forested areas.

The project area does not include Critical Habitat as defined by PS6. A biodiversity Management Plan is part of the overall management plan as presented in the EIA.

F. Community Engagement

LFZC has engaged with local communities through several initiatives including constant communication with community leaders and other local based groups in host communities, the implementation of a grievance mechanism, corporate social responsibility (CSR) programs to support local development, and a local employment program.

For specific CSR activities, LFZ supports the Tolaram Science Challenge, a competition for secondary school students in the Ibeju-Lekki area, which encourages a healthy competition among students. In addition, in terms of infrastructure, LFZ constructed a community hall in Magbon Segun, rehabilitated Iberekodo Primary Health Centre, and contributed food and medical supplies to communities during the covid-19 lockdown. It is important to note that besides these supports, LFZC has educated the communities on covid-19 response.

G. Local Access of Project Documentation

LFZC will disclose this document at its website (www.lagosfreezone.com) For inquiries or concerns about the environmental and social impacts of this project please fill the form available at <https://www.lagosfreezone.com/contact-us/> or write a letter to below mentioned contact.

Contact Person:	General Manager, Sustainability
Address:	Lagos Free Zone, Itoke Village, Ibeju-Lekki
Phone Number:	+234 1 4620912, +234 1 4620913

H. Environmental and Social Action Plan (ESAP)

S/N	ESAP Item
1	Ensure adequate documentation of proceedings during consultation with relevant stakeholders, including project affected communities (PACs).
2	Conduct a Project-specific climate risks study. The study should include opportunities for adaptation and contingency plan to protect the Project, as well as the public and environment from impacts of the identified risks.
3	Update the existing grievance mechanism to include timeline for resolving community grievances and provide proof that the grievance mechanism has been communicated to the PACs.”
4	Develop and document a retrenchment policy as part of existing human resource policies and procedures
5	Update the existing grievance mechanism to include channels for anonymous reporting of grievances by employees.
6	Develop and document a policy on child labour as part of existing human resource policies and procedures.
7	Develop and document a policy on forced labour as part of existing human resource policies and procedures.
8	Develop and implement as applicable, a complementary resettlement action plan/livelihood restoration plan (for the already resettled project affected persons (PAPs) and PACs) that meets the requirements of the IFC Performance Standards.
9	Develop procedure for monitoring and evaluating the implementation of Project-related Resettlement Action Plan /Livelihood Restoration Plan (RAP/LRP).
10	Develop a Biodiversity Action Plan (BAP) for the Project. As part of the BAP development, conduct a specialist assessment on turtle nesting along the project shoreline and implement the report findings.
11	As part of the BAP development, identify measures to minimize risk and impact of invasive alien species and to include specification for preventing the introduction of invasive alien species including monitoring.

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