

Sokoto to Badagry Superhighway, Section 2 (Kebbi State)

Project E&S Overview

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1. About this document

This document provides an overview of the environmental and social (E&S) assessment of Section 2 of the Sokoto to Badagry Superhighway. It summarizes the main E&S impacts and risks along the alignment, the management measures currently in place to manage those risks, and remaining gaps in the assessment. The Nigerian environmental approval for Section 2 of the Sokoto to Badagry Superhighway has been obtained; however, further studies are being undertaken in 2026 to address gaps between the National Environmental and Social Impact Assessment prepared to meet National standards and the International Financing Corporation (IFC) Performance Standards requirements. An independent review of the environmental and social risks has also identified actions that the Project has committed to, which are set out in the Environmental and Social Action Plan and summarised in Section 9 of this document. This summary is therefore based on the available information and commitments that have been made to date. This summary should be viewed as complementary to the other technical reports that comprise the national Environmental and Social Impact Assessment (ESIA), the independent Environmental and Social Due Diligence (ESDD) report and its Environmental and Social Action Plan (ESAP), and the supplementary ESIA with a target completion date of October 2026.

2. The Project

The Sokoto to Badagry Superhighway is a new national road that spans from Sokoto State in northern Nigeria to Lagos State on Nigeria's western coast. This national road will improve trade and transport within Nigeria as well as beyond its borders. A section-by-section construction methodology will be employed to build the Superhighway. This summary focuses on Section 2, which is situated within Kebbi State.

The Sokoto–Badagry Superhighway extends for 323 km within Kebbi State along the Alfala–Balugu corridor described in the national Environmental and Social Impact Assessment (ESIA), which remains the applicable national approval basis. The scope of this financing facility is Section 2 which comprises of 258 km of that length, running as a dual three-lane alignment from the Section 1 / Section 2 boundary near Bayawa (Augie Local Government Area) to near Bin Yauri (Ngaski Local Government Area). The remainder of the corridor within Kebbi State forms part of the Superhighway under an adjacent section; each section of the Superhighway is treated as an independent project for development, consenting and financing purposes. The 258 km figure therefore reflects the extent of Section 2 and does not represent a re-alignment, a reduction in length, or a change to the Project's strategic purpose. The route-selection process considered road geometry, connectivity with adjacent SBS sections, constructability, ground and drainage conditions, compensation exposure, sensitive environmental and social receptors, settlement patterns and the potential for physical and economic displacement.

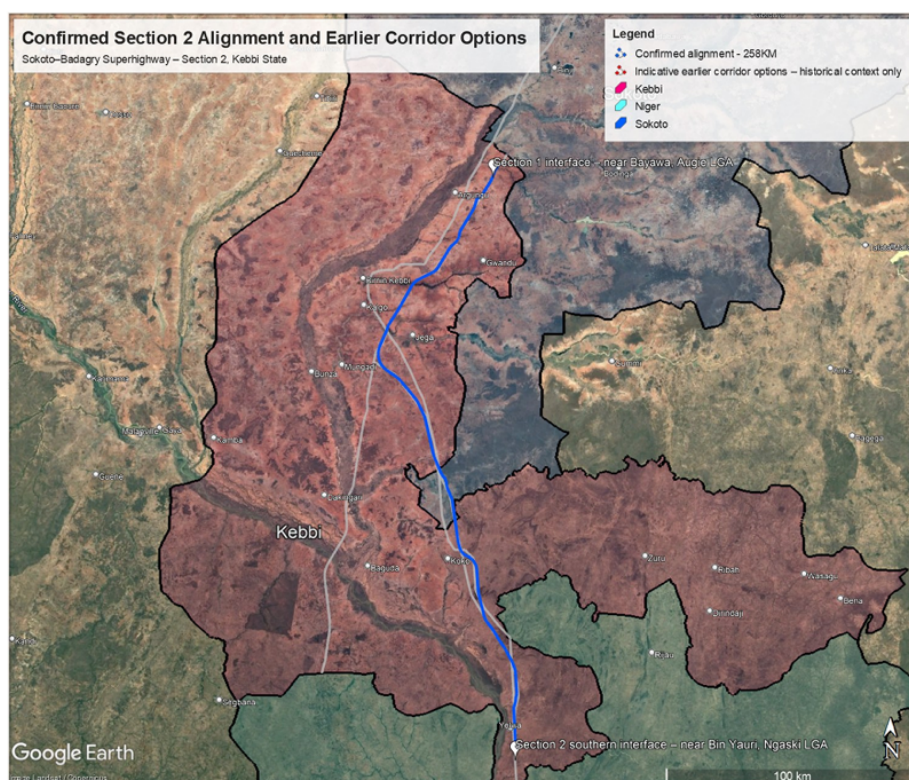
The dual carriageway has a concrete construction to adapt to Nigeria's hot climate and is designed with a life cycle of 50 years. The construction includes the provision of bridges, drainage structures and culverts, interchanges, and connections to local feeder roads. The Federal Ministry of Works is the Project owner. The first phase of construction has begun under a contract awarded to Hitech Construction Company Limited and employs more than 1,000 people, most of whom have been recruited from local communities.

The bridges along the route are being delivered as a separate works package and are not part of the financing to which this document relates. They are described here because they form part of the same road, and their environmental and social effects, and the interfaces between the bridge works and the main road works, are considered within the Project's Area of Influence and are covered by the management measures and commitments described in this document.

The Project will have impacts beyond the road. This includes the construction sites and yards, batching plants, borrow pits and/or quarries, the communities who live alongside or near the construction, and the land and waterways that the road will impact along its alignment.

Changes to the road alignment

During the design of Section 2, several route options were studied before the final alignment was chosen, weighing ground conditions, constructability, and the impact on the environment and people living along each route. The chosen alignment avoids rivers, wetlands and flood-prone land where possible, is steered around settlements where it can be, and limits disturbance to the natural environment, while keeping the same road capacity of three lanes in each direction.



[Figure 1: Map of the Section 2, 258 km route alignment within financing scope]

3. Status of E&S assessments

The National ESIA for Section 2 was approved by the Federal Ministry of Environment (FMEnv) on 14 January 2026. This approval is the Nigerian legal basis for the Project and provides the Project with a list of specific conditions pursuant to the approval that are to be met, including E&S monitoring and reporting requirements. The ESIA permit application was submitted to the Federal FMEnv on 3 February 2025. Following the regulatory review, it was approved with comments on 14 January 2026 and TSL Engineering subsequently updated the ESIA to incorporate the FMEnv comments and requirements, resulting in the final version dated February 2026.

The Project's lenders will fund the Project if it meets the requirements set out in the International Finance Corporation Performance Standards (IFC) and the Equator Principles. To bridge the gap between the National ESIA and the international lender requirements, the Project has conducted a gap analysis and is conducting a supplementary ESIA, which will consist of further surveys and impact assessments and is expected to be completed in full by the end of October 2026. It includes wet season environmental and wildlife surveys; a Critical Habitat Assessment; socio-economic surveys to verify the population that will be displaced physically and/or economically; screening for potential presence of Indigenous Peoples (as defined by IFC PS7) so their rights, interests, and concerns can be properly considered; cultural heritage surveys; assessments of the borrow pits and quarry and other associated sites; and climate risk and road traffic safety studies.

The Project has selected Ecoplanet as the independent third-party consultant to undertake project-level E&S monitoring and reporting. The contractual arrangements are currently being finalised and monitoring activities are expected to commence shortly following formal appointment, including regular E&S monitoring and reporting on the implementation of the ESAP and applicable E&S requirements. A detailed scope of work was provided during the ESDD review and was considered in development of the Project ESAP.

In July 2026, Independent Environmental and Social Consultants (IESCs) were hired by the lenders to conduct a site visit to the construction areas, review the Project documents in detail, and meet the management and workers as well as the worker representatives and community members. Their findings have been extensively documented within the ESDD report with time bound attributed actions prepared within the ESAP. The Project has committed to these findings and is actively addressing each aspect within.

4. Existing environmental and social context

Environmentally, the Section 2 corridor is a largely rural, semi-arid landscape where seasonal water availability, flood-prone areas, cultivated land, grazing areas and remaining natural habitats are the key features shaping project impacts. The line crosses farmland and rural communities whose main means of sustenance are farming and herding. This part of north-western Nigeria has a rich cultural and archaeological history linked to historic settlements, trade routes, riverine livelihoods and traditional authority systems, meaning that both known heritage places and previously unrecorded archaeological remains may be present along the corridor.

Baseline studies on air quality, noise, water and soil were conducted from November 2024 to January 2025, in the dry season. The Project is currently conducting surveys in the wet season to complete this study. Surveys on the flora and fauna along the line are also being conducted and a Critical Habitat Assessment will assess the habitats the road crosses and whether any are of high biodiversity value.

5. Main impacts and risks under management / assessment

Land and livelihoods

Progress on building new roads means the need to acquire land. Under Nigerian law, particularly the Land Use Act 1978, it is the responsibility of the Federal Ministry of Works to effect land acquisition and provide compensation for crops, trees and other structures. So far, the Project has identified around 600 persons affected along Section 2, and 143 structures have been compensated. The Project is aware that international standards require more than a national process. Therefore, the Project is actively progressing preparations for the verification and reconciliation of all affected persons, with the survey planned for September 2026. The Project will also prepare a livelihood restoration plan that will address international standards of entitlements, support for vulnerable persons, and a clear cut-off date. The Ministry will take responsibility for land and asset compensation, while Hitech will take responsibility for the livelihood restoration process; the Project will clarify this division of responsibility to affected communities.

Jobs and working conditions

With over 1,000 employees, most of whom derive from local communities, the Project is proactively implementing continuous improvement measures associated with working conditions, including hiring female workers, continuous training, and active union representation. In May 2026, training on IFC Performance Standard 2 (PS2) and the management of internal employee grievances was delivered at Hitech's Lagos headquarters, with participation from the Kebbi site administration. Additional training for supervisors on relevant E&S and workforce-related topics is planned over the coming months. The main risks are construction safety and working hours during busy periods, particularly once construction of the bridges begins. The Project has existing HIRAs covering bridge construction and lifting operations. The Project has committed to reviewing and supplementing these HIRAs, prior to any bridge construction related works, to ensure adequate coverage of high-risk activities, including specific risk assessments for work at height. The Project has also initiated Permit-To-Work (PWT)-related training and will continue to provide the required training to relevant personnel. In addition, the existing workers' grievance mechanism will be reviewed and strengthened to

address identified gaps. Along with this, the Project has committed to stronger occupational health and safety oversight through regular audits.

Community health, safety and access

Due to the intensive nature of construction, there is an increased risk from dust, heavy vehicles and open worksites. Some mitigation measures that have already been implemented include water spray dust suppression, crossing point marshals, shelters for roadside vendors, and safety awareness campaigns for the community. The risks posed by construction traffic, safe access and egress across the works and the influx of job seekers and workers to the local community remain a concern and will require ongoing mitigation. An influx management plan has been developed, and community health and safety measures will remain in place throughout the construction process.

Security

The corridor passes through areas with complex security conditions, including risks linked to local conflict, crime, and the involvement of state security forces. Project security relies on the collaboration of local community recruited personnel with the Nigerian military and state security services. Recognising the importance of both security and human rights, the Project incorporates international standards by providing security personnel with a human rights and security manual. The independent review encouraged the Project to provide more structure and specific responsibilities to the management of security, conduct a security risk assessment for the Project, provide security personnel training aligned with the Voluntary Principles on Security and Human Rights (VPSHR), and use the project's grievance mechanism for addressing community concerns or complaints regarding security personnel conduct. These measures have been incorporated into the ESAP.

Environment

The primary construction related impacts will be dust, noise, water consumption, waste, and storage of fuel and chemicals. The independent review recognised that several control measures had been implemented and identified the need to provide contained storage for chemicals at a construction yard, and to complete required permits for the sourcing of materials, both of which the Project has committed to address. The impacts of construction on vegetation and fauna will be further assessed through the current active surveys. The existing biodiversity management plan will then be reviewed and updated, as necessary, based on the findings of these surveys and the outcome of the Critical Habitat Assessment, with additional biodiversity actions developed in parallel where required.

Cultural heritage

The route crosses areas of cultural and religious importance and contains potential burial grounds, shrines, and sacred sites. It could also include unexplored archaeology. The Project has developed a management plan for cultural heritage and a procedure for unanticipated finds. A specialist in international cultural heritage has been assigned to complement the existing and future studies, and the Project has set up cooperation with the National Commission for Museums and Monuments as well as traditional and religious authorities. A project specific / dedicated cultural heritage specialist will be recruited at the national level to lead the work during the construction.

6. How impacts are being managed

The Project has an Environmental and Social Management System (ESMS), with a set of management plans covering occupational health and safety, environmental, waste and wastewater, community health and safety, cultural heritage, security, workforce influx, human resources, management of subcontractors, stakeholder engagement, grievance management, and preventing gender-based violence and harassment. At the work site, the independent review reported a number of strengths. A clinic and an ambulance are on site with a referral hospital nearby, workers adhere to strict personal protective equipment, have active worker representation, and access to the required welfare facilities on site. In addition, there are active and well documented community awareness campaigns underway.

The Project's prepared plans associated with the above are visibly active, however require revision with addition of Project specific details as some have not yet been fully operationalised. Accordingly, the action plan for these focuses on the implementation and continuous improvement of these prepared plans. This will be done through self-monitoring

plans in order to keep documented records showing the plans have been carried out, monitoring compliance, and through conducting independent reviews to determine the progress. The independent consultants will throughout construction activities monitor each phase of the Project on behalf of the lenders.

7. Community relations and grievance management

The Project's community relations team comprises community liaison officers working in and along the corridor. Community engagement to date has been very positive and has included meetings with the traditional and local government authorities, and awareness campaigns in the communities along the alignment covering community health and safety, road safety, the environment and the prevention of gender-based violence.

The Project has a systematic process that allows anyone from the communities to ask a question, report a concern, or make a complaint about the Project at no cost, confidentially, anonymously if desired, and free from any retaliation. Concerns or complaints can be directly addressed with a community liaison officer, by speaking with one of the community grievance committees, through suggestion boxes at the sites, or, once launched, by using the Project telephone line or website. Concerns or complaints about gender-based violence or harassment can also be made through a confidential route where fully trained staff will be available to manage the concerns and always maintain confidentiality, and where necessary, provide pathways to medical and other support services. Every complaint is documented, and the Project has committed to responding within a defined timeframe and updating the community on the outcome.

So far the main issues or concerns that the communities have raised include the timing of compensation for physical and/or economic displacement, opportunities for local employment, the provision of safe access to and from the works, and safety during construction. All these issues are being addressed by the actions articulated in this report and the Project has committed to deepen its engagement with women, youth, farmers and other vulnerable groups, beyond community leaders.

8. Pending items

The main outstanding items associated with active workstreams and priority ESAP considerations include:

- The supplementary ESIA and its surveys: wet-season environment and biodiversity, the Critical Habitat Assessment, social and economic surveys, cultural heritage, borrow pit and quarry assessments, groundwater, traffic safety and security assessments, due by the end of October 2026.
- The livelihood restoration plan and the verification of all people affected by land acquisition.
- Continued strengthening of the existing worker grievance mechanism and monitoring of its effectiveness.
- Strengthening and, where necessary, supplementing existing safety risk assessments, procedures and training for high-risk work, in particular bridge construction, work at height and lifting, before bridge works begin.
- Contained chemical storage at all sites, and completion of outstanding permits for material sources.
- Regular audits of labour and safety practices.
- Strengthened security management, including a section-specific security risk assessment and human rights training for security personnel.
- Identification of all sand and aggregate sources, including Borrow Pits with confirmation of required impact assessments and permitting has been completed.
- Screening for potential presence of Indigenous Peoples (as defined by international standards) who may be adversely affected by the project and whose rights, interests, and concerns require special consideration

Due to certain aspects of the above workstreams remaining in an active state, some findings in this summary are provisional with more detailed findings due.

9. Key commitments

The commitments below are drawn from the current Environmental and Social Action Plan agreed with the lenders. The full plan contains further specific details.

Commitment
Completion of the supplementary ESIA, including all outstanding surveys and the Critical Habitat Assessment and address any impacts identified by implementing appropriate mitigation measures, where required.
Obtain approval of all outstanding permits for material sourcing.
Develop a Project wide permit register to log and track permits, conditions, reporting requirements and period of validity.
Verify all project-affected people and prepare a livelihood restoration plan to international standards.
Ensure the effective operation and continued strengthening of the existing worker grievance mechanism across all sites.
Complete safety risk assessments, procedures and training for bridge construction, work at height and lifting.
Install contained chemical storage with spill response at all sites.
Begin the regular workers audit programme on occupational health and safety.
Strengthen security management: responsibility, section risk assessment, and human rights training for security personnel.
Continue community engagement and disclose this summary, including in Hausa.
Hire additional environmental and social specialists in line with the staffing plan.

10. Further information

The underlying documents for this summary are the national ESIA, which was approved by the Federal Ministry of Environment, the independent ESDD report and the Environmental and Social Action Plan, and the supplementary ESIA workplan.