

# A Participatory Climate Risk Reduction and Management Strategy for Amuwo Odofin Local Government



The CCDI and Amuwo Odofin Climate Change Teams en route to a riverine Community  
*Photo: Adeleke Adebanjo*

**Kofo Adeleke**  
**Director, Programmes**  
**Community Conservation and Development Initiatives**  
[www.ccdi.org](http://www.ccdi.org)

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## **Acronyms**

AOLG	Amuwo Odofin Local Government
CCDI	Community Conservation Development Initiatives
CCU	Climate Change Unit
CDA	Community Development Association
EHO	Environmental Health Officer
EIA	Environmental Impact Assessment
ELRI	Environmental Law Research Institute
FGD	Focus Group Discussion
FHA	Federal Housing Association
FMOH	Federal Ministry of Housing
INGO	International Non Governmental Organisation
LASEMA	Lagos State Emergency Management Agency
LASEPA	Lagos State Environmental Protection Agency
LASPARK	Lagos State Parks and Garden Agency
LAWMA	Lagos State Waste Management Authority
LEMC	Local Emergency Management Committee
LSDPC	Lagos State Development and Property Corporation
LSMOE	Lagos State Ministry of Environment
NESREA	National Environmental Standards and Regulations Enforcement Agency
NGO	Non Governmental Organisation
PSP	Private Sector Participants
SAP	Structural Adjustment Programme

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## **Executive Summary**

In partnership with Amuwo Odofin Local Government (AOLG) CCDI has produced a participatory risk reduction and management blue print for the local government. The vision is that this plan will could become a model for risk reduction and management strategy for all local governments in Lagos State affected by rapid population growth, limited resources and social inequalities, and all of these are compounded by the risks of climate change. The key objectives were to critically analyse the current scope for actions assigned to local governments compared to state government level in land use regulations and policies, based on the realities and needs of Amuwo Odofin Local Government.

The plan was developed in a participatory manner through a series of focus group discussions, which were multi-stakeholder and multi-disciplinary with contributions from legal practitioners, local and state government officials, local government legislators, NGOs and a diverse range of community representatives. The focal areas discussed were: *Wetland Conservation and Restoration; Flood Shelters and Evacuation Routes; Environmental Impact Assessments; Waste Management; and Public Spaces.*

The geographic location of AOLG is environmentally sensitive as it has wetlands and coastal areas which are being threatened by poor land use planning. There is a large degree of uncertainty within AOLG about how the local government should approach E.I.As and where they are carried out they should be wider in scope with greater transparency and public participation enshrined in them.

Waste management was identified by AOLG as a serious growing problem with huge increases in waste generation. Apart from health risks, waste is causing environmental degradation, polluting groundwater and blocking drainage channels and increasing the risk of flooding. AOLG feels that the local government is not getting value for the money it has deducted from its budget for waste management and has called for increased waste collection, and especially in neglected riverine areas. Waste to wealth initiatives need to be rapidly stepped up.

Public and open spaces are vital to the health and well-being of any community and are a necessary part of disaster risk reduction plans. Many public places in AOLG have either been lost to the private sector or the status is unclear. Open spaces within the local government must be properly identified and proper definition provided on their status and condition. Constructive dialogue over open spaces over responsibilities is required with LASPARK and FHA.

AOLG is a natural wetland but has become rapidly urbanised and the natural properties of wetlands to absorb rainfall is being lost and is a good example of why it is vital to protect and restore the remaining wetland areas that are rapidly disappearing. The local government must identify existing wetlands and mangroves swamps and engage with State and Federal government over the protection of these areas.

AOLG is highly vulnerable to the impacts of climate change, especially sea level rise but does not have flood shelters in place as temporary areas of safety, which people can easily reach. The local government must identify the number of shelters and places of safety needed and make assessment of possible locations and buildings that are suitable as temporary conversion to emergency shelters, as the need arises. It must also examine road networks within the local government and assess accessibility in cases of emergency.

Amuwo Odofin Local Government has no specific bye-laws relating to the wetlands, flood shelters, open spaces, evacuation routes and the conduct of environmental impact assessment. It does make byelaws but cannot exercise the powers because they are not gazetted. Where the State Government has not gazetted byelaws, it means that they are therefore not judiciable, which means they are not accepted in a court of law and therefore there is no authority over the enforcement of them. This problem cuts across all local governments. The delays from Lagos state government in harmonising byelaws in the state and getting gazetted, is clearly having a negative impact on local government.

Providing local government officers with more knowledge of how to use the rights and powers given to local government in land use and environmental regulation matters will build much needed capacity. The legal opinion is that if a law contradicts an Act enacted by the National Assembly, the provisions of the Act will prevail and that particular law will be void to the extent of its inconsistency.

Partnerships at the local, national and international level can be used for implementation of certain aspects of the strategic plan. Combined private and public sector partnerships can leverage technical and financial resources, which can be used to reduce climate risks in the community and increase resilience.

There are significant gains to be made by strengthening community integration and the opportunities to work with within community based associations. Well-informed and organised communities are much more likely to have success in leveraging financial support, strengthening community assets and influencing sustainable policies.

The local government must to be legally empowered manage environmental protection. Elected representatives of communities need to utilise their powers in the House of Assembly to ensure that local governments can carry out functions that will protect their communities from climate change threats. Improved institutional coherence between federal, state and local levels of government on environmental matters is critical if communities are to successfully adapt to safeguard their populations and assets from climate change.

Notwithstanding the challenges with regard to conflicts in the law and the multitude of external departments and agencies that have responsibilities in the local government, AOLG can, by creating platforms to engage with different tiers of government, address the risks highlighted in the five focal areas. Also , as outlined in the strategy, the creation of monitoring and task groups can be an effective way of enabling AOLG to apply the powers that it does have in respect of land use and regulation.

## **Background**

Climate change is happening as a result of human activities such as the burning of fossil fuels in power stations, and deforestation. Changes in weather patterns are threatening food production and are causing rising sea levels all around the world. In the future, we can expect to see global temperatures and average sea levels rise significantly. A number of cities , of which Lagos is one, have been identified as being especially vulnerable are likely to experience more extreme temperatures, heat waves and heavy rainfall more frequently.

The threat to economic development will be greatest in developing countries and the very poorest communities. Urban planning can help to provide protection against these threats. Policy makers must therefore proactively take measures to protect citizens from increased exposure to hazards and risks. In Lagos state, growing urban populations and weak local governance are some of the challenges that need to be urgently addressed to protect community assets. Climate risk reduction, which must be an integral part of local development, can contribute to improved socioeconomic well-being and is an important part of sustainable development. A holistic approach to development is required and starts with long term land use planning that integrates policies to meet the needs of communities, and in this case those that are facing environmental risks and dangers.

In partnership with Amuwo Odofin Local Government (AOLG) CCDI embarked on the development of a participatory risk reduction and management blue print for the local government, with the vision that the plan would become a model for risk reduction and

management strategy for all local governments in Lagos State. Local governments in Lagos are affected by rapid population growth, limited resources and social inequalities, and all of these are compounded by the risks of climate change. Over the past three years CCDI, in collaboration with the Heinrich Boll Foundation, has been involved in climate change training programmes with local governments and various initiatives to build climate change resilience through local adaptive capacity and green growth opportunities. These initiatives included urban farming and waste management initiatives, and business opportunities. CCDI was also involved in facilitating the establishment of Local Emergency Management Committees (LEMC) within local governments.

In many of these local governments and communities, the further development of the initiatives and planned actions was constrained and hampered by poor land use planning and lack of integration of climate change factors into development agendas. Analysis and investigation about urban land use planning, policies and management as they relate to local governments in Lagos State, are therefore of critical importance. Planning and decisions about land use are two of the most important functions of local governments.

The key aims and objectives of the project activity were to critically analyse the current scope for actions assigned to local governments compared to state government level in land use regulations and policies, based on the realities and needs of Amuwo Odofin Local Government. Multi-disciplinary and multi-stakeholder Focus Group Discussions (FGD) will be used to develop a strategy which is participatory in nature. The project sought to identify the obligations, constraints and opportunities that urban planning regulations and laws have to improve resilience, and it combines risk reduction with action on climate change. The project builds upon a vulnerability study, undertaken by CCDI in 2013 (*see Annexe 1*), in the local government which revealed that inexistent or wrongly applied land use policies increase the risk of flood disaster. A difficulty in the assessments of ecological vulnerability and responsibility within the Amuwo Odofin LG area is the fact that it is located in territory which is part federal (e.g. coastal area and port facilities, and FESTAC Town, which is managed by the Federal Housing Authority.).



## Amuwo Odofin Local Government



Fig 2 Amuwo Odofin Local Government Boundaries  
*Wikipedia*



Fig 3 Location of Amuwo Odofin Local Government  
 $6^{\circ}27'N$   $3^{\circ}16'E$   
*Google 2013*

Amuwo Odofin is one of 57 local governments in Lagos state and shares its boundaries with Ajeromi/Ifelodun Local Government to the East, Oriade Local Government to the West, the Badagry Creek to the South and Isolo/Igando Local Government to the North. It has two distinct geographical spheres of upland and riverine areas and according to the 2006 Census it has a population of over 1,500,000.

The Local Government is divided into three geo-political zones, that is, the Riverine, the Middle Belt and the Upper Belt. The Riverine area comprises Towns and Villages such as Tomaro, Ilado, Okun Glass, Sankey, Igbo Alejo, Igbologun etc. The middle belt begins with the Local Government boundary adjacent to Apapa Local Government through the Tin Can Coconut area, Beachland Estate.

The Upper belt comprises Amuwo Odofin Estate, Raji Rasaki Estate, Amuwo-Odofin New Town, Festac Town, Abule Ado, and the Trade Fair Complex among others. Located within Amuwo Odofin local government are the three largest port facilities in Nigeria, Apapa, Tin Can Island and Snake Island. (See figs.2 and 3.)

### Methodology

Amuwo Odofin Local Government was chosen for this project for a number of reasons; its Chairman has shown great vision and leadership in his stewardship of the local government and demonstrated seriousness in addressing climate change threats by the establishment of a staffed Climate Change Unit. It also has a solid record of community sensitization on environmental issues. Amuwo Odofin Local Government was fully involved in the organisation and planning of this project.

A participatory strategy for risk reduction and responses to climate related disasters through efficient environmental management needed to be developed to ensure that all citizens benefit from a safer environment. Important issues were identified and prioritised and to assist long term decision-making through active citizen participation.

To ensure that the plan for the risk reduction strategy was conducted in a participatory manner it was conducted through a series of Focal Group Discussions FGDs (see *Annexe 2*). The strategy focused on five priority planning areas of concern which can improve environmental quality in the local government. Areas under discussion included: *Wetland Conservation and Restoration; Flood Shelters and Evacuation Routes; Environmental Impact Assessments; Waste Management; and Public Spaces*. Although *Transport, Building Codes, Food Security, Health, Energy and Water* are also key areas for building resilience, they were not within the scope of the study.

The activities for this project included research, and multi-disciplinary focus group discussions on appropriate land use regulations and policies, with input from legal experts. The multi-stakeholder focus group discussions had representatives from grassroots, private sector, the local government's legal department, local government councillors and others to deliberate on how they can contribute to efficient environmental management to reduce the risk reduction of climate related disasters.

The first stage was made up of three FGDs with representation largely from state and local government and academics and environmental practitioners local and state government officials, local government legislators, NGOs. The discussions were led by legal experts who were able to explain and examine the application of existing laws to the topical areas. (see *Annexe 3*) The second stage was made up of four remaining FGDs with greater community based representation; AOLG officers, representatives of the Climate Change Unit, chairpersons of residents associations, waste recycling managers, Community Development Council and Community Development Association representatives, horticulturists, community and youth representatives, riverine community members, members of the Local Emergency Management Committee (LEMC), market leaders and medical officers (see *Annexe 2*) and more focus was put on the core areas: *Waste Management, Public Spaces, Wetland Conservation and Restoration and Riverine Communities and Flood Shelters and Evacuation Routes*.

All of the focus groups discussions were professionally filmed and documented to develop a short advocacy video (see *Annexe 5*). The media were updated on the activities. (see *Annexe 6*)

The contributions from the FGDs have been summarized into a strategy (see sections 7-11) which lays out for each of the focus areas the risk, the vision, the objectives and suggestions for implementation of an action plan. The aim is that once the risk is established the vision to solve it gets translated into objectives, which require an implementation action plan for the activities which can then be developed into programmes and projects which then have to be monitored, evaluated and disseminated.

This strategy is not prescriptive and can be modified and improved upon to suit the needs of the local government.

### **Environmental Impact Assessments**



**Fig. 4 The Lagos Light Rail facility under construction**

*Photo: Ako Amadi*

### **Introduction**

The Local Government is expressly empowered under section 33 of the Urban & Regional Planning Act 2004 to refuse an application by a developer which does not have a detailed Environmental Impact Assessment (E.I.A) attached to it in respect of the land in the areas within the jurisdiction of the Local Government and puts an obligation on a developer to submit a detailed environmental impact statement to the local government's Development Control Department for permission to carry out certain types

of construction work, and empowers the local government to refuse applications which do not have detailed E.I.As.

(see *Annexe 4*) However, the Lagos State Urban and Regional Planning Law 2010, which has replaced the 2004 Act, does not make any provision for the preparation of an E.I.A as a prerequisite for a development permit. During the FGD (see *Annexe 2*) AOLG residents have had cause to challenge certain projects, especially the installation of masts by telecommunication companies within the community.

Resilience to the impacts of climate change can be enhanced by safe land use planning and adherence to E.I.A guidelines can save lives and communities. EIA is a procedure that must be followed for certain types of development before they are granted development consent. It is a process for identifying the environmental effects, which could be positive or negative, of proposed developments before development consent is granted. The aim of EIA is to stop, decrease or counteract the significant adverse environmental effects of development proposals, and where developments do go ahead environmental assessments should help to propose proper mitigation measures augment positive ones. A key feature of a good EIA is public participation.

Many Nigerians are neither aware of the existence of the E.I.A guidelines, nor what it is exactly used for, and why it is legally binding. This came out in the discussion over this legal instrument. The AOLG felt that EIAs should be conducted and verified with the assistance of the authority nearest to the location of projects requiring an EIA, which is the LG. In addition the discussion on impact assessments brought into focus a belief that detailed control over construction of individual houses is essential in order to protect people against the builders of substandard housing, rapacious landlords, fire, infectious disease, and other health hazards.

### **Risk Analysis Summary**

The geographic location of AOLG is environmentally sensitive as there are natural resources in the area such as wetlands and coastal areas which are being threatened. Therefore in areas likely to be affected by development due regard must be given to the existing land use. There is a large degree of uncertainty within AOLG about how the local government should approach E.I .A

### Vision

*AOLG seeks to ensure that planning decisions are made taking into consideration environmental effects, and with full engagement of government agencies and the local community and other interest groups, and that proper E.I.A are carried out on all proposed projects in the local government, both public and private, to ensure*

*environmental protection to communities and better standards of development, and in some cases no development at all.*

### Goals and Objectives

1. E.I.As carried out in the local government should be wider in scope and more transparent with public participation enshrined.
2. Find out which regulatory body LASEPA or NESREA has control over how EIA are carried out.
3. Provide clarity over who is responsible for EIA reports at the local government level and the role of the local government Environmental Services Unit.
4. Examine the expertise within the Environmental Service Unit and the capacity it has to interpret and carry out EIA.

### Implementation

A suggested composition of Task Group: CCU, Environmental Services Unit, legal department, LASEPA, NESREA. *Once the group has been identified and those concerned have expressed commitment specific roles and responsibilities can be assigned.*

Meetings: Location and structure and frequency of meetings to be decided by the committee

Time frame: This should be set up to achieve the activities needed to fulfil the agreed objectives.

### Milestones of Success

1. Production of indicators on how EIAs carried out in AOLG can become wider in scope and more transparent.
2. Assistance from LASEPA and NESRA on how the EIA practice can be improved upon at local government level.
3. Clarification over responsibility for EIA within AOLG.
4. Report on the capacity and capability of the Environmental Services Unit to carry out EIAs.

### Reporting Tools

- a) Reports written and stored electronically and circulated to all task force members.

- b) Newsletters, social media to communicate information.
- c) Clear system of communication agreed and identified.

### Accountability

The time frame and names responsible for actions should be made public and circulated. Clearly define and organise the structure, responsibilities and roles. Decision making should be transparent and well communicated

### Monitoring and Evaluation

Develop a monitoring, evaluation and assessment strategy and define who is responsible for follow up and monitoring. Residents associations could be given key monitoring role on progress of objectives. Include feedback mechanisms and opportunities for community to make inputs throughout the plan.

### Cross Cutting Issues

#### **Public Spaces, Wetland Conservation and Restoration**

### Political Support

The Chairman and the leadership of LASEPA and NESREA need to give their backing to the objectives.

### Partnerships

Links can be formed with environmental management NGOs or firms who may be able to provide help to train local government staff on E.I.As.

### Investments in People and other Resources

Investments should be made in training local government staff on E.I.A policy and procedures.

### Financial

A financial plan should be drawn up for required meetings.

### Knowledge Sharing

Other local governments should be contacted to share information on how E.I.A matters are handled in various local governments.

### **Sustainable Waste Management**



**Fig. 5 Waste Dumping in Forest beside Lagos-Badagry Expressway**

*Photo: Ako Amadi*

### **Introduction**

The 1999 Constitution of the Federal Republic Nigeria empowers local governments to construct, maintain and regulate sewage and refuse disposal. (see *Annexe 4.*). However, in response to the overwhelming waste management challenges that had developed with population growth in Lagos the Lagos State Waste Management Authority was established by law in 2007 by the House of Assembly. Its functions should be carried out by a governing board which should include of one local government chairman from each of the three senatorial districts in Lagos. The Local Government does not directly have powers to regulate or legislate on waste management, even in areas within its jurisdiction. However, the Local Government may make a bye-law that provides for waste disposal and management and it may apply to the State authority to ensure effect waste management in its areas of jurisdiction. The Local Government can also apply to LAWMA for a license to manage its waste through a body or company established by it for this purpose

The FGD on this subject (see *Annexe 2*) addressed the question that why is waste management centralised in a decentralised polity? LAWMA is a state and not an LG organ responsible for waste management, and conflicts with LG by-laws and conduct are common.

The outcome from the FGD on waste management showed that AOLG was unhappy that, despite a large sum of money being paid to LAWMA on a monthly basis, the local government still employs over 200 street cleaners and provides about three trucks for waste disposal and regularly distributes tools such as rakes, shovels, cutlasses and brooms to residents. AOLG has made efforts to sensitize residents and market women and men about the need to dispose of waste in an environmentally friendly manner.

The consensus of opinion from discussants which included five zonal chairpersons was that the state of waste disposal in Amuwo Odofin was deplorable and unacceptable. Most citizens had to make their own private arrangements to have their domestic waste disposed. There is a general belief from residents that waste management has deteriorated over the years. PSPs have a very difficult time removing waste from communities, the trucks are also overloaded and often in a damaged state. The problem of waterways clogged with water hyacinth, *an income generating natural resource*, was raised. Poor construction of gutters, inadequate planning for the number of residents and their needs and general poor land use management has contributed to overpopulation in certain areas and resulted in the attendant waste management issues. Residents feel that weekly waste evacuation is inadequate and they would like to see a return of the old style sanitary inspectors who were more efficient.

The situation in the riverine areas such as Snake Island of the AOLG is even worse as they have to wait for weeks for their waste to be collected in a barge and shipped to waiting trucks on the mainland. There is a feeling of neglect in these communities, more so as nothing is done to check pollution from vessels through disposal of waste by their crews. Community members also complained that fish and shrimp catches have diminished as a result of pollution in the harbour and lagoon. It was confirmed that Local Government Chairpersons represented on the board of LAWMA but that this has been suspended. If this was still in place it would be a point of leverage to highlight all of these issues.

AOLG has a population of about 1.5 million and there are eight EHOs for 8,000 people. The community would like alternative community based management solutions. Residents also wanted more meetings to air and hear community views. Also AOLG has no magistrate courts, only customary courts which are not mandated to try environmental offences.



Nobody seemed to know what the factories produced in the form of waste products as these businesses did not open their doors to any form of inspection by the local government, except for the state-controlled LAWMA. LAWMA admitted there were lapses and shortage of staff, and staff capacity development and training.

The organization said it was considering comprehensive “polluter pays principles” as the guideline for regulation of industrial waste.

### Risk Analysis Summary

Waste management has been identified by several local governments, including AOLG, as not just a challenge but a serious growing problem with huge increases in waste generation. Apart from health risks, waste is causing environmental degradation, polluting groundwater and blocking drainage channels and increasing the risk of flooding, making communities less resilient against the impact of increased rainfall. AOLG feels that too much money is being deducted from AOLG by LAWMA with little to show for it.

### Vision

*AOLG is committed to work with local residents and LAWMA to reduce the amount of waste in all parts of the local government and increase the number of locally based waste management initiatives.*

### Goals and objectives

1. Increase collection of waste in community, especially in neglected riverine areas
2. Open dialogue with LAWMA over the special needs and waste management issues in AOLG and improve the relationship.
3. Obtain full details of all PSPs working in the local government.
4. Establish plans for removal of waste from motor parks, markets, street vendor locations and other places where there is no formal arrangement for the evacuation of waste.
5. Review the scope and adequacy of the activity of the EHO's, with the aim of increasing inspections.
6. Conduct public education programmes on sanitation and waste management, which are taken to the people and carried out on the streets e.g. road shows.
7. Erection of signage about waste dumping.
8. The AOLG CCU should be involved in research and advocacy.
9. Establishment of a local environmental court.
10. Establish waste to wealth initiatives in collaboration with LAWMA and the private sector.

### Implementation

A suggested composition of Task Group: CCU, EHOs, LAWMA, PSPs, Resident Association Leaders, AOLG Legal department. *Once the group has been identified and those concerned have expressed commitment specific roles and responsibilities can be assigned.*

Meetings: Location and structure and frequency of meetings to be decided by the Task Group.

Time Frame: This should be established to achieve the activities needed to fulfil the agreed objectives and provide a clear timeline for delivering progress reports.

### Milestones of Success/Indicators to measure progress and achievement of objectives

1. Targets are set for removal of waste from the community.
2. Waste management issues peculiar to AOLG are presented to LAWMA
3. Indicators established to improve synergy between AOLG and LAWMA.
4. List of PSPs working in the area listed and details published.
5. Agreements on areas where EHOs can increase efficiency on waste management issues agreed with community leaders.
6. At least three new waste to wealth initiatives identified with joint action between LG, LAWMA and the private sector.
7. Public education road shows on waste management.

### Reporting Tools

An internal and external communications strategy should be developed to inform AOLG officials and the community and others about both achievements and challenges.

- a) Methods of recording and communicating the identified actions should be outlined e.g. newsletters, social media, use of websites whichever is the most suitable for both storing and disseminating information.
- b) Monthly progress reports should be submitted by Task Group members.
- c) Monthly progress reports should be submitted on the waste to wealth projects.
- d) Overall supervision of reporting should be done by the EHOs.

### Accountability

The time frame and names responsible for actions should be made public and circulated. Clearly define and organise the structure, responsibilities and roles. Decision making should be transparent and well communicated

### Monitoring and Evaluation

Develop a monitoring, evaluation and assessment strategy and define who is responsible for follow up and monitoring. Residents associations could be given key monitoring role on progress of objectives. Include feedback mechanisms and opportunities for community to make inputs throughout the plan.

### Cross Cutting Issues

#### ***Public Space, Wetland Conservation and Restoration***

### Political Support

The Chairman of AOLG and the leadership of LAWMA should be in support for the actions and must agree to work on the goals and objectives.

### Partnerships

Local companies must be made aware of the vision and solicited for support and informed of the impacts on and consequences for their own businesses if action is not taken.

### Investments in People and other Resources

Capacity building will be brought about by joint actions. Inter agency relationships will be developed and collaborative partnerships with the private sector.

### Financial

Financial support will be need for increased evacuation of waste, investment in waste to wealth initiatives and Task Group meeting logistics.

### Knowledge Sharing

Progress reports and methods should be shared with other local governments.

## Public Spaces



**Fig 6 Playground at Bishop Kogi School, Sagbokoji, in the Riverine Area of Amuwo Odofin Local Government**

*Photo: Ako Amadi*

## Introduction

The 1999 Constitution of the Federal Republic Nigeria empowers local governments to construct, maintain, and regulate open spaces such as markets, motor parks, public conveniences and gardens etc. (see *Annexe 4*). The Lagos State Parks and Gardens Agency (LASPARK) was created by Lagos State government in 2011 to support the Lagos State Ministry of Environment in the areas of environmental regeneration and restoration, through the provision of parks, gardens and recreational centres state-wide.

The community members who attended the FGD on public spaces (see *Annexe 2*) decried the fact that the open spaces in the master plan for FESTAC had disappeared. This master plan predates the formation of AOLG. Churches and halls for parties have been built on areas which have been designated as open spaces. AOLG has its own tree planting programme, and the trees planted require monitoring. Residents complained of that they had no access to fresh air or open spaces, and many of the blocks of flats in AOLG housing estates lacked even balconies.

The main problem that came out of the discussion was how to regain open spaces for recreation and markets and other community activities. Hunger and insecurity however, were the real priorities for residents and these are the reasons why they have stopped agitating for open spaces. During the SAP period many people lost their jobs and had

no choice but to convert small spaces meant for gardens into commercial spaces, as pensions were also inadequate, resulting in a proliferation of container shops, from which the government collects ground rent.

Community members believe that open spaces have been hijacked by the bourgeoisie. The LSDPC, which has been replaced by the Lagos Building Investment Corporation, came in for a lot of criticism over the sale of land that was converted from public to private ownership. The monetary value of land has skyrocketed and as a result government organizations have been selling land meant for the public to raise revenue. AOLG lacks car parks, market space and spaces for recreation. It was also made clear that Festac and the AOLG low cost housing estates have very different problems, including the issue of open spaces. Both the local government and the FMOH were accused of trampling on people's rights.

AOLG said that it had been ordered by LASPARK to stop landscaping within the local government.

### Risk Analysis Summary

Public and open spaces are vital to the health and well being of any community. Green spaces help to reduce carbon dioxide and pollution and can contribute to reducing CO2 in the atmosphere. Sufficient open space is required for natural systems to provide important environmental services. Public spaces are necessary as part of disaster risk reduction plans. Many public places in AOLG have been lost to the private sector or the status is unclear.

### Vision

*AOLG aims to create a green and healthy local government with adequate spaces for the population set aside for greenery and recreation and to support community needs for a safe, healthy and resilient local government.*

### Goals and objectives

1. To identify all open spaces within the local government and provide detailed information on their status and condition and give them a proper definition.
2. To create awareness about the importance of health and environmental benefits and empower residents to take action over the need for more public spaces for recreation.
3. Trees planted under the tree planting programme need to be monitored and also the illegal felling of trees requires legal backing.

4. To open dialogue with LASPARK and FHA over the open spaces and how to protect them and divide responsibilities.
5. Identify public spaces where markets, motor parks, police and fire stations can be located to support the community.
6. Increase youth and gender representation in decision-making over the use of public spaces.
7. Provide clarity on existing disputes over public spaces.
8. Examine the needs for market, motor parks and bus stations space in AOLG.

### Implementation

A suggested composition of the Task Group: CCU, Department for Works, LASPARK, FHA AOLG Legal Dept, local football clubs and recreation clubs, residents associations and youth organizations. *Once the group has been identified and those concerned have expressed commitment specific roles and responsibilities can be assigned.*

Meetings: Location and structure and frequency of meetings to be decided by the Task Group

Time frame: This should be established to achieve the activities needed to fulfil the agreed objectives and provide a clear timeline for delivering progress reports.

### Milestones of Success/Indicators to measure progress and achievement of objectives

1. Reports on the condition of all existing open spaces and their status.
2. Identification of at least two parks or spaces suitable for playing games.
3. Identification of potential sites for markets, motor parks, fire and police stations.
4. Financial plan for developing parks and recreation areas.
5. Plan for management of parks and job creation opportunities.

### Reporting tools

- a) Reports will be written by the CCU and stored electronically in multiple places.
- b) Use of newsletters and social media to inform the public about the goals and objectives and progress on activities.
- c) Adequate system of communication should be set up between agencies.
- d) Information about the status and condition of the spaces should be widely circulated.
- e) Details of ongoing court cases should be publicised.

### Accountability

The time frame and names responsible for actions should be made public and circulated. Clearly define and organise the structure, responsibilities and roles. Decision making should be transparent and well communicated

### Monitoring and Evaluation

Develop a monitoring, evaluation and assessment strategy and define who is responsible for follow up and monitoring. Residents associations could be given key monitoring role on progress of objectives. Include feedback mechanisms and opportunities for community to make inputs throughout the plan.

### Cross Cutting Issues

#### ***Flood Shelter and Evacuation Routes, Wetland Conservation and Restoration***

### Political Support

Very important engage with LASG, LASPARK and FHA and make sure they understand the vital issues regarding public space in AOLG and including historic issues. Opportunities to gain back public spaces and also preventing existing ones being converted to public use should be taken to the House of Assembly and National Assembly.

### Partnerships

The private sector should receive awareness information of the importance of the vision. Sponsorships should be sought to rehabilitate and support the development of open spaces.

### Investments in People and other Resources

Joint action on projects; inter agency cooperation, investigation, proposal writing skills development are all areas around which capacity can be built.

### Financial

A financial plan needs to be drawn up to align with the strategy for achieving the objectives. Funds need to be sought for developing recreation areas and finances to support meetings and dissemination.

### Knowledge sharing

Progress reports and methods should be shared with other groups. Intervention in this area could benefit from joint action with a number of other local governments.

### **Wetland Conservation and Restoration**



**Fig. 7 Wetland Areas at FESTAC Town**  
*Photo: Ako Amadi*

### **Introduction**

The 1999 Constitution of the Federal Republic Nigeria states that the functions of the local governments, among other things, includes participation in the development of natural resources, apart from exploitation of minerals “ *the local government has land use authority to protect and improve and safeguard the land and the environment within its jurisdiction area. This will include conservation and restoration of wetlands.*”(see *Annexe 4*). However, the Lagos State Urban and Regional Planning Law 2010 (see *Annexe 4*.) gives authority to the state to regulate urban and regional planning and this has greatly eroded local government powers to ensure effective planning within their areas. Also the Land Use Act 1978 gives local governments control and management of all land in non urban areas located in that local government, however the designation of areas as either urban or non urban has become a challenge since the state government has control over this and it is subject to gazetting.

Two main issues arose from the FGDs (see *Annexe 2*) on the topic of wetlands. The local government is facing great difficulties in preserving wetlands because development permits on those areas are being granted by the Federal Housing Authority, the agency in charge of the management of Festac, where some of the wetlands are. One was the fact that wetlands are being indiscriminately sold by the Federal government for development purposes, even when the FMOE has a mandate to protect such areas. Huge demand for land means that there will be tradeoffs between



different land uses. Unfortunately much of the wetlands have been sold as a result of the huge demand in Lagos for real estate, leaving communities increasingly vulnerable to environmental degradation as a result of the loss of natural drainage.

Then there is the dispute between the Federal government and the State government over lands in and around the Festac area that have been designated as wetlands and riverine areas. Both the local and state government wish to protect wetlands as a buffer zone in AOLG but the Federal government in the form of FHA is not in line with this thinking. The second issue is that the wetland and riverine areas are being heavily degraded by pollution from industries and shipping from the nearby ports. These communities feel neglected and the degradation of their environment combined with the uniqueness of their location makes it very difficult and expensive for them to develop sustainable businesses. Women were at one time engaged in mat weaving but the natural materials for it have now disappeared from the area as a result of oil spillages.

### Risk Analysis Summary

AOLG has many creeks, rivers and lagoons and is highly vulnerable to the impacts of sea level rise. AOLG is a natural wetland but has become rapidly urbanised and the

natural properties of wetlands to absorb rainfall is being lost. Many local governments are characterised by this and AOLG is a good example of why it is vital to protect and restore the remaining wetland areas that are rapidly disappearing and threats to its ability to provide essential services such as flood regulation and protection and biodiversity.

### Vision

*AOLG aims to protect all existing wetlands and mangrove swamps and indigenous ecosystems from unsustainable development and environmental degradation to provide communities with resilience against climate change, and protect local livelihoods and restore natural beauty to riverine areas.*

### Goals and objectives

1. Identify existing wetlands and mangrove swamps.
2. Prepare a report on their condition.
3. Identify sustainable livelihood strategies for inhabitants of those areas.
4. Identify key threats from industrial pollution and property speculators.
5. Engage with State and Federal government over the protection of these sites.
6. Make attempts to protect the sites with bye laws.
7. Raise awareness about the importance of wetlands to community resilience.

## Implementation

A suggested make up of Task Group: CCU, Dept of agric, legal dept, riverine communities, FMOE, LSMOE, FHA. *Once the group has been identified and those concerned have expressed commitment specific roles and responsibilities can be assigned.*

Meetings: Location and structure and frequency of meetings to be decided by the Task Group

Time frame: This should be established to achieve the activities needed to fulfil the agreed objectives and provide a clear timeline for delivering progress reports.

## Milestones of Success/Indicators to measure progress and achievement of objectives

1. Identification of all wetland mangrove swamps in AOLG.
2. An Information report on area, size, location and condition of the wetland areas.
3. Ideas and strategy developed for sustainable livelihoods.
4. Information about threats documented and circulated and actions in place to protect the areas from such threats.
5. Successful engagement with State and Federal government over the need to protect wetlands in AOLG.
6. Preparation of bye laws on wetlands by the AOLG Legal Department.
7. Awareness initiatives developed for protecting wetlands.

## Reporting tools

- a) Reports written and stored electronically and circulated to all task force members.
- b) Newsletters, social media to communicate information.
- c) Clear system of communication agreed and identified.
- d) Report on key threats and the consequences to wetlands and riverine areas circulated.

## Accountability

The time frame and names responsible for actions should be made public and circulated. Clearly define and organise the structure, responsibilities and roles. Decision making should be transparent and well communicated

## Monitoring and Evaluation

Develop a monitoring, evaluation and assessment strategy and define who is responsible for follow up and monitoring. Residents associations could be given key monitoring role on progress of objectives. Include feedback mechanisms and opportunities for community to make inputs throughout the plan.

## Cross Cutting Issues

### ***Public Spaces***

### Political Support

All environmental government departments and agencies, at all three tiers of government, and environmental NGOs should be fully informed of the threats and risks. Support for wetland protection and restoration should be widely canvassed with assistance from INGOs.

### Partnerships

Partnerships can be sought with environmental NGOs for technical expertise on wetland conservation and restoration, and advice on sustainable livelihoods in riverine areas.

### Investments in People and other Resources

Public education can be provided on environmental; protection of wetlands, mangroves and riverine areas in the form of awareness and training for residents.

### Financial

A financial plan should be drawn up for required meetings, assessment of wetlands, environmental awareness campaigns and possible clean ups and restoration.

### Knowledge Sharing

Other local government s with wetlands and riverine areas should be informed. Also the national and international media should be brought in to highlight the situation

## Flood Shelters and Evacuation Routes



**Fig.8 Local Transportation FESTAC Town**

*Photo: Ako Amadi*

### Introduction

AOLG is surrounded by low-lying areas and rivers and creeks and has a coastline and is highly vulnerable to flooding and sea level rise. However, participants in the FGD (see *Annexe 2*) said that the local government does not have any identified places for shelter for the local residents in case of emergency.

In view of this there is a need for *disaster risk mapping* to produce proper documentation and data on the nature of previous emergencies and disasters. The lack of land owned by the local government made it difficult to put in place or designate areas for shelters. It was pointed out that quite a lot of disasters risk reduction measures can be put in place without the need for funds. Also local governments should evaluate road networks and accessibility, roads to places of safety need to be accessible for ease of evacuation. Proper planning should include multiple exits, contra flow lanes and special technologies that will ensure full, fast and complete evacuation.

### Risk Analysis Summary

AOLG is highly vulnerable to the impacts of climate change, especially sea level rise. Growth in population and rapid urbanization is increasing the urgency of having disaster risk reduction and management plans in place. The Lagos State government has organized a couple of centres for people who become displaced as a result of disasters but the first responders should be local governments. AOLG does not have flood shelters in place as temporary areas of safety, which people can easily reach.

## Vision

*AOLG will create awareness of easily accessible places of safety for residents in case of disasters and emergencies and ensure that the LEMC is fully functioning and able to respond to citizens needs in times of emergency.*

## Goals and Objectives

1. Identify the number of shelters and places of safety needed.
2. Make assessment of possible locations and buildings that are suitable as temporary conversion to emergency shelters, as the need arises.
3. Examine road networks within the local government and assess accessibility in cases of emergency.
4. Raise awareness within private sector of the risks and need to take disaster risk reduction measures to protect life and property.
5. Plan a community awareness campaign about places of safety.
6. Strengthen the capacity functions and activities of the LEMC
7. Keep documentation and data on previous disaster in communities.
8. Identify muster points for each community
9. Identify equipment needs

## Implementation

A suggested composition of the Task Group: CCU, Dept of works, Dept of Agric LEMC, LASEMA, residents associations, CDAs, churches, schools, hospitals, Lagos State Bureau of Public Works. *Once the group has been identified and those concerned have expressed commitment specific roles and responsibilities can be assigned.*

Meetings: Location and structure and frequency of meetings to be decided by the Task Group

Time frame: This should be established to achieve the activities needed to fulfil the agreed objectives and provide a clear timeline for delivering progress reports.

## Milestones of Success/Indicators to measure progress and achievement of objectives

1. Adequate number of shelters /places of safety identified for serving the AOLG population.
2. Identification of suitable locations and agreements reached on how they can be used.

3. An assessment report on road networks and their accessibility.
4. Awareness campaign organised and targeted at all residents on what to do in times of emergency.
5. Key indicators established for strengthening the role and activities of the LEMC

### Reporting Tools

- a) All reports of meetings should be stored in electronic form.
- b) Newsletters and social media should be used to inform residents about the aims and objectives of the exercise and progress with activities.
- c) Reports should be circulated to key members of the task group and clear systems of communication outlined from the outset.

### Accountability

The time frame and names responsible for actions should be made public and circulated. Clearly define and organise the structure, responsibilities and roles. Decision making should be transparent and well communicated

### Monitoring and Evaluation

Develop a monitoring, evaluation and assessment strategy and define who is responsible for follow up and monitoring. Residents associations could be given key monitoring role on progress of objectives. Include feedback mechanisms and opportunities for community to make inputs throughout the plan.

### Cross Cutting Issues

#### **Public Spaces**

#### Political Support

The Chairman should be made aware of these issues and carried along and also LASEMA

#### Partnerships

Private sector involvement would be of benefit to this activity. This sector also needs to protect its staff and assets in the community as fortunes in the private sector can be adversely affected by the events in the wider community. Private sector sponsorship could be sought for any additional work needed to provide shelters and equipment. Partnerships can be formed with the Red Cross, local NGOs and resident associations and CDAs. Volunteers should be key partners in making people aware and should be given key roles to perform in the event of emergencies and disasters.

### Investments in People and other Resources

Training should be given to volunteers on how to prepare for and perform during emergencies. The Red Cross and LASEMA can help with building capacity. Inter-agency cooperation is key.

### Financial

A financial plan, needed for organizing meetings and carrying out activities to meet the objectives, should be drawn up. Funds may also be required for any further needed shelters, apart from the existing ones that have been identified.

### Knowledge Sharing

Progress reports should be shared with other local governments.

## **Bye Laws in Amuwo Odofin Local Government**



**Fig. 9 Jakande Housing Estate**

*Photo: Ako Amadi*

The Constitution of the Federal Republic of Nigeria 1999 recognises three (3) tiers of government namely Federal, State and Local governments. Each tier is empowered to make laws. In tandem with this constitutional authority, the Local Government effectively has a bye law in relation to the environment referred to Environmental Nuisance Bye-Law No 04/2009 which has about ten sections dealing on environmental protection. (see *Annexe 4*)

On the question of litigation and punishment of environmental offenders, not many of the FGD participants were fully aware of the application of the environmental laws in Nigeria. Bye laws are laws of local or limited application and usually made by local

councils, they are derived from Federal law and must be consistent with it. AOLG has a number of bye laws (see *Annexe 4*) which have to be given public hearing for comments before they are passed, and should be available in free booklets to members of the public. These bye-laws notwithstanding, Amuwo Odofin has no specific bye-laws relating to the wetlands, flood shelters, open spaces, evacuation routes and the conduct of environmental impact assessment.

However, like other local governments AOLGs bye laws have not been gazetted by the state government and they are therefore not judiciable, which means they are not accepted in a court of law and therefore there is no authority over the enforcement of them. This problem therefore cuts across all local governments. The Lagos state government wishes to harmonise all of the bye laws in the state, and this has created a the very long delay in getting them gazetted, and it is clearly having a negative impact on local governments .The AOLG legal department confirmed that they make bye laws, and that the local government has powers that it cannot exercise because they are not gazetted.

### **Legal Expert Opinion**

The legal experts examined the application of the laws to the five priority areas and the application of the powers of the local government for successful planning and implementation. They concluded that even though there are conflicting laws which undermine the ability of the local government to have control, the local government still has a measure of power in relation to land use for successful planning and implementation an efficient risk and management plan in those priority areas. (see *Annexe 4*). The following recommendations and suggestions should be considered:

1. The legislative, executive and quasi-judicial staff and appointees of the local government should have greater awareness of the rights and powers given to the local Government. This will build their capacity in terms of having knowledge of the extent of powers and rights of local government in land use and environmental regulation matters.
2. The local government should organise seminars and discussions with relevant stakeholders, particularly with State Government and Federal Government. This could be used as a platform to engage with these tiers of government with a view to amicably resolve issues of undue usurpation and subsumption of Local Government powers.
3. Partnerships with private industry through the public-private partnership initiatives will strengthen the financial muscles of the Local government, Involvement of



community development associations private companies, NGOs and other interest groups, in policy formulation should be encouraged and serve as a watchdog in ensuring successful planning and implementation of efficient risk reduction and management policies.

4. Creation of monitoring bodies and task forces is another effective way to apply the powers given to the Local Government in respect of land use and regulation. These monitoring bodies and task forces will be charged with the duty of ensuring that tasks that have been discussed and/or concluded in papers, documents, and that blueprints are successfully implemented. They will also be saddled with the responsibility of reporting each stage of progress, highlighting the delays and how they can be tackled.
5. Considering the fact that AOLG comprises lands that are within its jurisdiction, lands that are within the jurisdiction of the State Government and lands that are within the jurisdiction of the Federal Government, where the AOLG intends to exercise powers to conserve and restore wetlands, build flood shelters and evacuation routes, conduct environmental impact assessment and create public spaces in respect of a State or Federal land, it will have to apply to the relevant authority of the State or Federal Government. In the case of the Federal Government, the appropriate authorities are the Federal Ministry of Land and/or the National Urban and Regional Planning Commission, depending on what the Local Government seeks to do. In the case of the State, the appropriate authorities are the Lagos State Ministry of Lands and/or Ministry of Physical Planning & Urban Development.
6. Section 4(5) of the Constitution provides where a Law enacted by a State House of Assembly contradicts an Act enacted by the National Assembly, the provisions of the Act will prevail and that of the Law will be void to the extent of its inconsistency. This is based on the popular principle of Covering the Field. It can therefore be argued that the usurping provisions in the Lagos State Urban and Regional Planning Development Law cannot successfully stand the test of judicial adjudication.

### **CCDI Conclusions and Recommendations**

1. Climate change issues have actually helped to put more focus on local matters at the local government level and helped raise certain developmental issues higher up on the agenda.

2. Although there are different schools of thought, especially within Lagos State, decentralisation of administrative functions can improve efficiency and equity in service delivery and also improve policy making through increased public participation.
3. Private and public sector participation, combined with strong commitment to action can leverage technical and financial resources, and encourage private sector initiatives which are in line with objectives to reduce risk in the community and increase resilience. However, without a clear strategy and plan, backed up with statistical data and information, it is very difficult to access resources.
4. Partnerships and innovative alliances can be at local, national and international level for the implementation of aspects of the plan.
5. The importance of maintaining open spaces as well as creating them as part of state and local government policy cannot be over-emphasized in Amuwo Odofin. Many open spaces, in some of which the local football teams once played have been sold and built on, and a government must not be seen to encourage such blatant land grabbing and destruction of parks and gardens, while at the same time conducting periodic tree-planting exercises.
6. The local government stands to gain by working on processes to integrate people within the community, guarantee them rights as individuals, while encouraging them to work within community associations on concerns such as waste disposal, sanitation and waste management. In local emergency management committees, parks and gardens, recreation and education.
7. The activities of the resident's association must be encouraged by the AOLG, and work closely with it. These organisations are closest to the people and are basically what participatory and inclusive governance is all about. A three-tier system of the residents associations forming an umbrella federation which reports to the local government would be ideal
8. By their organization and concerted action, informed and pragmatic communities are more likely to cohere into a critical mass leveraging financial support, strengthening community assets, demanding responsive governance and resisting land, environment, energy and other policies that result in their current unsatisfactory status.
9. Broad community participation is required to increase knowledge about building resilient communities. Activities during the implementation of the action plan

should reveal areas where technical assistance is required and produce education and training opportunities.

10. Communication efforts should be intensified by publishing decisions, work plans, assessments and evaluation reports, and ensuring wide dissemination.
11. The state government, working in conjunction with the local government, must begin to make projections on the capacity of environment and its infrastructure to carry the rapidly growing population, to avoid the establishment of illegal markets, motor parks, markets and bus stops.
12. Local governments need to set targets that they wish to achieve and this can only be done if they make serious efforts to collect a wide range of data, figures and statistical information which shows the current state of play in the local government. This information can also be used to raise awareness and concerns over the priority areas and become a rallying point for action.
13. According to the legal opinion many of the environmental laws are not judiciable”, meaning practically that no one can be prosecuted for environmental degradation. If that is so, where then is the legal responsibility for environmental protection, and how might the laws be enforced effectively? The LG cannot in such a situation where it is not empowered legally to deal with offenders and pollution effectively, but can only work through advocacy and environmental education, which is not enough.
14. Perhaps in a future initiative, the costs of environmental management could be assessed in consideration of taxation and levies on citizens. This has remained a discreet subject of argument that must be brought to light.
15. The role of House of Assembly members who have a duty to the communities they represent is crucial. The use of private bills was severally mentioned during the FGDs as a means of bringing about the needed changes and the powers of the Lagos State House of Assembly to put forward private bills should be used. House of Assembly representatives, who are elected by residents of the local governments, have a duty to make legislation that can empower the local government to carry functions which will protect the communities from climate change threats.
16. From the FGD on the laws of environmental protection the question was often asked why was there no institutional coherence, or synergy between federal, state and local governments in environmental matters. Many local government

laws and edicts are not gazetted, and mostly the local government is not only politically but also legally hamstrung.

17. There is a need for local governments to network together up the ladder and organise their own FGDs and invite State and Federal government agencies as a means of resolving the issues which are stopping them from providing the best possible service to local citizens. Strong collaboration, planning and partnership between the State Government and Federal Government over projects will also improve service delivery at the local government level.
18. Participants at the FGDs wanted the outcome of the FGDs, this report, to be circulated widely at all three tiers of government, including relevant State and Federal agencies.
19. The success of the strategy will depend largely on the ability of the various stakeholder groups to build strong alliances, collaborate and engage in partnerships constructively.
20. The real pressing issue is not about one law conflicting with another but how the different parties can work together around the problem to deliver to the kind of services that are in the best interest of the communities.

### **Annexes**

1. *A Risk Reduction Management Plan for the Amuwo Odofin Local Government Area of Lagos State, Nigeria.* **Ako Amadi**
2. List of Focus Group Discussions and Participants
3. *Discussion Brief on Existing Land Use Policy and Regulations for Local Government Councils Enabling Development on Efficient Risk Reduction and Management Plans.* **Environmental Law Research Institute**
4. *Climate Resilience for Local Governments in Lagos State.* **Environmental Law Research Institute**
5. Focal Group Discussion Video (edited version)
6. Press Cuttings.



**Fig. 10 FGD 5 Held in an Open Space within Festac**

*Photo: Ako Amadi*