



The Honorable Minister  
Federal Ministry of Environment  
Abuja, Nigeria

25 May 2016

**COMMENTS ON THE EIA OF THE PROPOSED CALABAR-IKOM-KATSINA ALA SUPERHIGHWAY PROJECT:  
DRAFT REPORT SUBMITTED TO THE FEDERAL MINISTRY OF ENVIRONMENT**

This group of Nigerian and international conservation NGOs had already expressed their deep concern over the process currently proceeding with respect to the proposed Calabar-Ikom-Katsina Ala Superhighway project in Cross River State (please see attached letter to President Buhari dated 20<sup>th</sup> October 2015). We wish now to reemphasize these grave concerns, particularly concerning the content and process of the EIA recently prepared by PGM Nigeria Limited.

Recognized as a global biodiversity hotspot, the conservation and sustainable management of the forests of Cross River State have been supported by various Nigerian and international NGOs since the 1980s. Working through and with both the Federal and State government, considerable funding has been provided by multilateral funding agencies including the EU, UK DFID and the US Fish and Wildlife Service, whilst many others still maintain close interest in the significant investments of resources that have previously been made to protect and manage this critically and globally important rainforest.

So extreme was the concern generated as a result of the current process, procedure and proposals for the proposed Cross River State Superhighway that the signatories of this letter commissioned an objective gap analysis of the draft Environmental Impact Assessment (EIA) report prepared for the proposed Calabar-Ikom-Katsina Ala Superhighway project. With the aim to provide objective and external advice on the draft document, the signatories selected Environmental Resource Management (ERM) an international environmental, social and sustainability consultancy of global respectability that offers an extensive track record in both impact assessment and review/gap analysis of impact assessments prepared by others both in Nigeria, throughout Africa and globally.

The report by ERM is attached here and highlights no fewer than 27 major areas of either inadequacy or actual gaps with respect to the content of the report, the following areas taken from the report's conclusion must be taken into consideration:

a) The scoping process is inadequate and provides no information on the rationale or analytical process that was adopted. For example marine and aquatic habitat studies were scoped out. However this is not correct since the highway route clearly begins at the coast. Scoping is a vital part of the EIA process and should be sufficiently robust to focus efforts on key relevant issues for more detailed consideration.

b) Baseline data are unclear, inconsistent, frequently contradictory and often incorrect. A number of key species have been overlooked and some of those listed are either extinct or unknown from the area. There is no identification or assessment of critical/natural habitats. It is therefore impossible to effectively identify potential impacts due to the project or to recommend adequate mitigation measures.

c) The project description is fundamentally flawed, most critically it fails to consider any impacts due to the 20 km wide corridor of land acquired by the Government of Cross River State along the entire route of the proposed superhighway. This corridor will undoubtedly have a devastating impact on the forest and more than 180 communities living there. Since the EIA does not have an adequate project description that includes this 20 km corridor, it is impossible for the document to subsequently identify potential impacts or to recommend adequate mitigation measures to manage them.

d) Project justification: There is no cost-benefit analysis for each of the routes proposed and no clear justification or reasons provided for building a new superhighway rather than simply upgrading the existing road. The EIA merely cites "government bureaucracy" as a reason for not upgrading the current highway. The project justification section of the EIA is completely inadequate for a project of this magnitude with its potential impacts on hundreds of thousands of people, as well as the major cost involved.

e) The EIA does not adequately consider the impacts of the superhighway on nearby protected areas namely Cross River National Park, Afi Mountain Wildlife Sanctuary, Afi River Forest Reserve, Ukpon River Forest Reserve and Cross River South Forest Reserve.

- *Cross River National Park (CRNP)*: the EIA incorrectly shows the "proposed" WWF boundaries for the Oban Division of CRNP which have never been legally gazetted. However, if one considers the legally gazetted boundaries of the Oban Division, then the highway actually cuts through the national park. In our last letter of 20<sup>th</sup> October 2015, we called for the park gazette to be amended to adopt the boundary proposed by WWF in 1989. We re-iterate the need for this once more. It should be stated that even with this amended boundary, the current proposed highway route will still have a severely negative impact on the park.
- *Cross River South Forest Reserve*: The EIA does not even show this reserve on its maps. The highway will cut directly through this important forest reserve with major impacts inevitable.

These two protected areas as well as Afi Mountain Wildlife Sanctuary, Ukpon River Forest Reserve and Afi River Forest Reserve (also not shown on the maps of the EIA) will suffer various negative impacts including increased bushmeat hunting, increased logging and increased illegal farming as a result of the project, yet the EIA fails to outline these impacts or to set out viable mitigation measures.

f) Stakeholder engagement has been extremely limited and clearly fails to meet accepted standards as outlined by both Nigerian legislation and international best practice.

g) There is no Environmental and Social Management System (ESMS) that will be required to manage and monitor effective mitigation of impact. This is perhaps one of the most significant gaps of the EIA.

h) Mitigation measures are described at a conceptual level only with insufficient detail for implementation.

i) The EIA does not consider impacts to all of the many rare and endangered species present and fails to even mention the Preuss's red colobus monkey *Procolobus preussi* and the slender-snouted crocodile *Mecistops cataphractus* both of which are classified by IUCN as *Critically Endangered*.

j) The socio-economic study focused on only 21 communities whereas it is estimated that more than 180 communities within the 20km corridor will be affected by the proposed project. The full impact on these communities, on their livelihoods and vulnerability has not been assessed.

k) There is no consideration of any cultural heritage data.

In summary, the findings of this gap analysis clearly indicate that the draft EIA is inadequate and cannot in any way be considered as a document on which any meaningful decisions might be made as to the further development of the project. It is clear that there has not been a sufficiently robust process to identify and mitigate the impacts from a project of this magnitude on one of the world's most important biodiversity hotspots. We believe that the document is so fundamentally flawed that it cannot simply be revised and should instead be completely redone.

Given that the state government has already cleared substantial sections of the highway route (in clear abrogation of the EIA laws of the Federal Republic of Nigeria) we respectfully request that:

1. The EIA process should be re-done using an acceptable and robust process to enable a proper route selection process that will minimize negative impacts on the people and biodiversity of Cross River State.
2. Compensation should be given to the communities and households that have lost homes and crops during the clearance already carried out

We remain available to assist both the State and Federal government with the EIA process (with scientific studies and also with stakeholder engagement) to ensure it meets the highest national and international standards and promotes sustainable development for Cross River State.

Yours sincerely,

#### Attachments

1. Calabar-Ikom-Katsina Ala Superhighway ESIA Gap Analysis, Report Produced by ERM to WWF
2. Letter to His Excellency, Mohammadu Buhari, President of the Federal Republic of Nigeria, dated 20<sup>th</sup> October 2015

Signed:



Fred Kwame, Director, WWF Africa, Kenya



John Robinson, Executive Vice President, Wildlife Conservation Society, USA



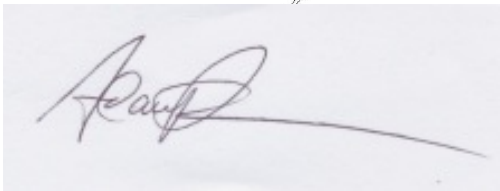
Hazell Shokellu Thompson, Birdlife International, UK



Jonathan Bailie, Zoological Society of London, UK



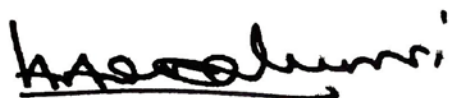
Richard Bergl, Curator of Conservation and Research, North Carolina Zoo, USA



Adam Phillipson, Program Officer, Great Apes Program, Arcus Foundation, UK



Mark Rose, CEO, Fauna and Flora International, UK



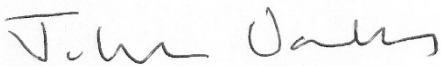
Adeniyi Karunwi, Executive Director, Nigerian Conservation Foundation, Lagos, Nigeria



Tunde Morakinyo, Iroko Foundation, UK



Liz Macfie, Coordinator, Section on Great Apes, IUCN  
SSC Primate Specialist Group



John Oates, Hunter College, City University of NY, USA



Ako Amadi, Community Conservation and Development  
Initiatives (CCDI), Nigeria



Zoe Parr Kennaugh, Director of Karunya Consulting,  
Botswana

Contact Details:

Andrew Dunn

Nigeria Country Director: Wildlife Conservation Society

adunn@wcs.org