

ENVIRONMENTAL MANAGEMENT PLAN (EMP) REPORT

FOR THE CONSTRUCTION OF

TWO-STORY BUILDING

EGBEANI EBENATO EZE OYE VILLAGE, NIBO, AWKA SOUTH LOCAL GOVERNMENT AREA, ANAMBRA STATE



PROPONENT:

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SUBMITTED TO:

ANAMBRA STATE MINISTRY OF ENVIRONMENT

MAY 2026

CERTIFICATION

We certify that this Environmental, Social, Health and Safety Management Plan (ESHSMPP) Report for the construction of Two-Story Building flats, located at Egbeani Ebenato Ezeoye village, Nibo, Awka South Local Government Area, Anambra State, was carried out in accordance with Professional Practice and the Anambra State Ministry of Environment (MoEnv.) guidelines.

Signed.....

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We, the undersigned members of the report preparation team, certify that we have prepared this Environmental Management Plan in accordance with professional standards, regulatory requirements and ethical guidelines. We affirm that the findings, conclusions and recommendations contained in this report are accurate, complete and based on objective evidence gathered from the project site and from the documents made available by the proponent.

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This List of Preparers is submitted as part of the Environmental Management Plan for the Proposed Construction of a Two-Story Building at Egbeani Ebenato Ezeoye village, Nibo, Awka South Local Government Area, Anambra State. Prepared by Stellovate Limited, May 2026.

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LIST OF ABBREVIATIONS AND ACRONYMS

Abbreviation	Meaning
ANSEWCCA	Anambra State Erosion, Watershed and Climate Change Agency
ASWAMA	Anambra State Waste Management Authority
CCTV	Closed Circuit Television
EEDC	Enugu Electricity Distribution Company
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
ESHSMP	Environmental, Social, Health and Safety Management Plan
ESS2	Environmental and Social Standard 2 (World Bank), Labour and Working Conditions
ESS10	Environmental and Social Standard 10 (World Bank), Stakeholder Engagement and Information Disclosure
LGA	Local Government Area
NESREA	National Environmental Standards and Regulations Enforcement Agency
NSDWQ	Nigerian Standard for Drinking Water Quality
OHS	Occupational Health and Safety
PM10	Particulate matter with a diameter of 10 microns or less
PM2.5	Particulate matter with a diameter of 2.5 microns or less
PPE	Personal Protective Equipment
TOR	Terms of Reference
WHO	World Health Organization

EXECUTIVE SUMMARY

This Environmental Management Plan covers the proposed two-story building at Egbeani Ebenato Ezeoye village, Nibo, Awka South Local Government Area, Anambra State. The proponent is Ezinwa Jennifer Chizitere. The building sits on a plot of 279.07 square metres and, as designed by Arcgem Development Ltd, rises three floors above ground, ground floor, first floor and second floor, with two-bedroom flats on each floor. The building footprint of 198.08 square metres leaves 80.99 square metres of open compound space. This is a tighter ratio than is typical for a plot of this size, because part of the land was taken up to create an access route for the plots situated behind it, a change made after the original drawings had already been prepared.

At the time of the site inspection in May 2026, construction had reached superstructure stage. The block walls stand to roof level on all three floors, reinforcement starter bars are still exposed at the parapet, and the window and door openings remain unfilled. No plastering has been carried out and no roof covering is yet in place. This EMP has accordingly been prepared to bring the project into environmental compliance at this stage of construction, ahead of the remaining works of roofing, plastering, fitting out and eventual occupation.

The site is enclosed on all sides by a sandcrete block perimeter fence with a gated frontage onto an untarred access track. Beyond the fence, the surrounding land is largely open and under active small-scale farming, with scattered oil palm and plantain, and the neighbourhood generally is sparsely built. Water for construction is drawn from an on-site borehole, pumped by a generator that is used for no other purpose; work on site is carried out almost entirely with manual hand tools, which keeps mechanised noise and diesel emissions off the site. The proponent intends to fit the compound with a solar-powered borehole pump, solar-powered CCTV, solar-powered security lighting, a stormwater catchment pit and a covered waste bin container at the frontage.

Baseline conditions recorded at inspection were favourable. Recent rainfall had settled dust and ambient air quality around the site was clean. The noise environment was close to silent, broken only by worker conversation, occasional hand tool use and intermittent generator operation during water pumping. Topography is flat and the soil is sandy loam, consistent with the wider Awka South area.

Because construction was already under way before a consultant was engaged, the formal pre-construction public consultation set out in Section 315 of the Anambra State Environmental Management, Protection and Administration Law, 2024 was not carried out ahead of ground-breaking. To correct this, Stellovate Limited undertook a consultation visit to the project neighbourhood in May 2026. A nearby resident, identified as Oba, was engaged and confirmed the land history of the site and the proponent's compliance with the community land requirements applicable to the area. This consultation record, and the fuller consultation the proponent is to carry out under Section 315 before the building is occupied, are addressed in Chapter 5 of this report.

Table A: Summary of consultation carried out to date

Date of engagement	May 2026
Venue	Project neighbourhood, Egbeani Ebenato Ezeoye village, Nibo, Awka South LGA
Person engaged	A nearby resident identified as Oba
Nature of engagement	Retrospective consultation, the site having already reached superstructure stage before the consultant was engaged
Outcome	Confirmation of the land history of the site and of the proponent's compliance with applicable community land requirements. No objection raised.
Next step	Full public notification and 21-day comment period under Section 315 of the 2024 Law, to be completed before the building is occupied, as set out in Chapter 5

This report is being issued in stages. This submission contains Chapter One, which sets out the background to the project and the full legal and regulatory framework that governs it. Chapters Two to Five, covering the project description, baseline data, the impact mitigation and monitoring plan and the implementation arrangements, follow the same structure and are in preparation. On the information gathered so far, nothing about the site, its surroundings or the manner of construction suggests an impact that cannot be managed by the measures proposed in this report.

CHAPTER ONE

INTRODUCTION AND REGULATORY FRAMEWORK

1.1 Background and Purpose of This EMP

Ezinwa Jennifer Chizitere owns a plot of land at Egbeani Ebenato Ezeoye village, Nibo, Awka South Local Government Area, Anambra State. The plot measures 279.07 square metres. Site analysis carried out for this report shows a building footprint of 198.08 square metres, which is 70.98 percent of the plot, leaving 80.99 square metres, or 29.02 percent, as open compound space. This is a smaller free area than a plot of this size would ordinarily allow, because a strip of the land had to be given up after the original design stage to create a passage for the plots located behind, which had no other means of access. The building, designed by Arcgem Development Ltd, rises three floors above ground, ground floor, first floor and second floor, and is described on the approved drawings as a Two-Story Building, with a two-bedroom flat provided on each floor.

At the time of the site visit in May 2026, the building had already reached superstructure stage. Block walls stand to full height on all three floors, with reinforcement starter bars still exposed above the parapet in readiness for roofing. Window and door openings are yet to be fitted, no plastering has been done to either the internal or external walls, and no roof covering has been laid. The compound is fully enclosed by a sandcrete block perimeter fence with a gate at the front, facing the access track. Water for the remaining works is drawn from a borehole sunk on site, pumped into storage using a small generator that is switched on only for pumping and is not connected to any other tool or equipment on site. With that one exception, all work observed on site is carried out by hand, using ordinary mason's and carpenter's tools rather than powered machinery.

This document is the Environmental Management Plan for the project, prepared in compliance with Part 8 of the Anambra State Environmental Management, Protection and Administration Law, 2024. Because construction had progressed to superstructure stage before Stellovate Limited was engaged, this EMP serves the additional purpose of regularising the project's environmental standing under Section 227 of the 2024 Law, which requires prior consideration of environmental effects before a project is undertaken. The proponent is to register the project in the Public Registry of the Anambra State Ministry of Environment and observe the statutory public comment period

under Section 315 of the 2024 Law before the remaining works of roofing, plastering and fitting out are completed and the building is occupied.

1.2 Project Need and Justification

Nibo is one of the towns making up Awka South Local Government Area and sits within reach of Awka, the Anambra State capital. Egbeani Ebenato Ezeoye village lies off Mbaukwu Road, in an area where development is proceeding gradually, plot by plot, alongside continuing small-scale farming. The two-bedroom flats proposed for each of the three floors respond to demand for self-contained residential accommodation of this kind within commuting distance of Awka, without requiring the scale of a large estate development.

A three-floor building of two-bedroom flats is a reasonable fit for a 279.07 square metre plot of this shape. The footprint of 198.08 square metres is on the high side as a proportion of the plot, a consequence of the access strip taken from the land after the original design was drawn, and this is a matter the proponent will need to manage carefully in the layout of parking, drainage and waste storage within the remaining 80.99 square metres of open space, as set out further in Chapter 2. The borehole and the proposed solar-powered pump, CCTV and security lighting are a sensible response to a neighbourhood where mains electricity supply from the Enugu Electricity Distribution Company, which serves this part of Anambra State, is not always reliable, and where the surrounding plots remain largely open and under-developed.

1.3 Scope and Structure of This EMP

This EMP covers the project from its current point at superstructure stage through the remaining construction activities of roofing, plastering, fitting out and external works, and into the operational phase once the flats are occupied. The report is structured in five chapters, summarised below.

Table 1.1: EMP Report Structure and Chapter Summary

Chapter	Subject Matter
Chapter 1: Introduction and Regulatory Framework	Project background, need and justification. Full legal and regulatory framework. EMP objectives and Terms of Reference.

Chapter 2: Project Description and Site Setting	The building and its compound infrastructure. Construction method and progress to date. Site location, topography, surroundings and sensitive receptors.
Chapter 3: Baseline Environmental and Social Conditions	Air quality, noise, groundwater and soil conditions recorded at inspection. Climate, geology and hydrology. Social baseline including land use, neighbours and the consultation record.
Chapter 4: Impact Mitigation and Monitoring Plan	Core technical chapter. Impacts by phase, with significance rating, mitigation measures, monitoring indicators, frequency and responsible parties.
Chapter 5: Implementation Arrangements	Institutional roles and responsibilities. Consultation record and grievance mechanism. Emergency response procedures and implementation schedule.

1.4 Legal and Regulatory Framework

The instruments listed below govern this project and have directly informed the preparation of this EMP. The mitigation and monitoring measures to be set out in Chapter 4 are designed to bring the project into compliance with each one.

Table 1.2: Legal and Regulatory Framework

Regulatory Instrument	Relevance to This Project
Anambra State Environmental Management, Protection and Administration Law, 2024	Primary governing law. Section 225(f)(iv) identifies an Environmental Management Plan as the appropriate report for a small-scale project of this kind, one with minimal impact in the short run but capable of cumulative impact over time. Section 227 restricts commencement of a project without prior consideration of its environmental effects, which is the reason this EMP is being brought forward now, before the remaining construction proceeds. Section 228 sets the minimum content of the report. Section 231 requires registration in the Public Registry at the Ministry on payment of a Fifty Thousand Naira fee. Section 315 requires public notification and a 21-day comment period before an environmental decision affecting the project is made. Part 9 (Sections 255 to 257) addresses statutory nuisances, including dust, noise and structural defects, of direct relevance given the farmed plots and dwellings around the site.

	Part 10 places waste handling with the Anambra State Waste Management Authority and requires the use of licensed collectors. Part 7, including Section 216, governs wastewater and sanitary discharge and will apply to the septic and soakaway arrangements for the finished building. Part 2 establishes the Anambra State Erosion, Watershed and Climate Change Agency, relevant to drainage and erosion control on the sandy loam soil of the site.
Environmental Impact Assessment Act, Cap E12, LFN 2004, and EIA Procedures and Charges Regulations, 2021 (S.I. No. 109 of 2021)	Federal EIA framework. A three-floor residential building of this size falls within Category III of the Fifth Schedule to the 2021 Regulations, a category of projects expected to have essentially beneficial environmental characteristics. The Second Schedule sets out the minimum content for an EMP or ESIA report, which this document follows.
NESREA Act, 2007	Establishes the national environmental standards authority. NESREA ambient air quality and noise standards, referenced in Table 1.3 below, are the benchmarks used for the baseline readings and monitoring targets in this report.
National Environmental (Sanitation and Wastes Control) Regulations, 2009	Requires waste segregation at source and the use of licensed waste collectors, and prohibits open dumping and open burning on site, both during the remaining construction works and once the building is occupied.
WHO Guidelines for Drinking Water Quality and Nigerian Standard for Drinking Water Quality (NSDWQ), 2015	Reference standard for the borehole supplying the site, and for the design of the borehole headwork to keep the water supply free of contamination during the remaining construction period.
National Environmental (Electrical/Electronic Sector) Regulations, 2011	Governs end of life disposal of the solar panels, battery banks and CCTV equipment proposed for the compound. Spent batteries and electronic components must go to a licensed recycler and not into the general waste bin.
World Bank Environmental and Social Standard 2 (ESS2) and ESS10	International reference standards applied for occupational health and safety on site and for stakeholder engagement and grievance handling, consistent with the approach used across Stellovate Limited's EMP work.

The numerical standards applicable to this project are consolidated below for quick reference. These are the benchmarks against which the baseline data in Chapter 3 will be assessed.

Table 1.3: Applicable Environmental Standards and Numerical Limits

Parameter	Standard / Limit	Regulatory Source
PM10 (24-hour average)	116 ug/m3	NESREA National Ambient Air Quality Standards
PM2.5 (24-hour average)	25 ug/m3	NESREA / WHO
Nitrogen Dioxide, NO2	0.085 mg/m3	NESREA
Carbon Monoxide, CO	50 mg/m3	NESREA
Daytime noise (residential / mixed-use)	50 to 60 dBA	NESREA National Ambient Noise Standard
Drinking water pH	6.5 to 8.5	WHO / NSDWQ 2015
E. coli in drinking water	0 cfu/100 mL, must be absent	WHO / NSDWQ 2015
Soil pH	6.0 to 8.0	NESREA Interim Soil Quality Reference Values
Wastewater effluent pH (discharge)	6.0 to 9.0	NESREA Effluent Limitations

1.5 Objectives of This EMP

1. Impact identification

To identify the environmental and social impacts of completing and occupying this three-floor, two-bedroom-flat building at Egbeani Ebenato Ezeoye village, taking full account of the reduced open compound space, the surrounding farmed plots, the untarred access track and the manual construction method observed on site.

2. Mitigation

To set out mitigation measures that the proponent and the site supervisor can actually carry out, using materials and labour readily available locally, except where a licensed specialist is required by law.

3. Monitoring

To put in place a monitoring framework simple enough for the proponent and site supervisor to apply through the remaining construction period and into occupation, so that any emerging problem is caught before it affects a neighbour or the environment.

4. Regulatory compliance

To demonstrate compliance with the Anambra State Environmental Management, Protection and Administration Law, 2024, the Federal EIA Procedures and Charges Regulations, 2021, and the other instruments listed in Table 1.2, and to correct the absence of prior environmental consideration before construction began.

5. Stakeholder accountability

To record the consultation carried out to date, set out the fuller public consultation still required under Section 315 of the 2024 Law, and assign clear responsibilities under this EMP to every party involved in the project.

1.6 Terms of Reference

This EMP has been prepared against the Terms of Reference for the environmental assessment of the proposed Two-Story Building at Egbeani Ebenato Ezeoye village, Nibo, Awka South LGA, Anambra State, drawn from the requirements of Part 8 of the Anambra State Environmental Management, Protection and Administration Law, 2024, and the Second Schedule to the Federal EIA Procedures and Charges Regulations, 2021.

The Terms of Reference include:

- a) Description of the proposed development, its current stage of construction, and the compound infrastructure planned for the finished building, including the borehole, solar-powered pump, solar CCTV and solar security lighting.
- b) Baseline environmental and social conditions at and around the project site, supported by field observation and, where instrumentation is available, measurement of air quality, noise, groundwater quality and soil quality.

- c) Identification of the impacts likely across the remaining construction phase and the operational phase, with particular attention to the reduced open compound space, the surrounding farmed plots and the untarred access track used for deliveries.
- d) Practical mitigation measures for each impact identified, implementable by the proponent and site supervisor using locally available resources.
- e) A monitoring framework specifying the indicator, method, frequency and responsible party for each significant impact.
- f) A consultation record, including the retrospective engagement already carried out and the fuller notification and comment period still to be completed under Section 315 of the 2024 Law.
- g) A grievance mechanism accessible to neighbours throughout the remaining construction period and into occupation.
- h) Institutional responsibilities, emergency response procedures and an implementation schedule for the remaining works.
- i) An assessment of the project's compliance with applicable national and state environmental regulations and standards.

CHAPTER TWO

PROJECT DESCRIPTION AND SITE SETTING

2.1 Project Overview

The project assessed in this report is a three-floor, Two-Story Building under construction on a 279.07 square metre plot at Egbeani Ebenato Ezeoye village, Nibo, in Awka South Local Government Area of Anambra State. The building was designed by Arcgem Development Ltd in March 2024 and provides two flats on each of the ground, first and second floors, giving six flats in total once complete. Table 2.1 sets out the key project parameters confirmed during this assessment.

Table 2.1: Project Overview

Project Feature	Detail
Project name	Proposed Two-Story Building, Egbeani Ebenato Ezeoye village, Nibo
Proponent	Ezinwa Jennifer Chizitere
Project address	Egbeani Ebenato Ezeoye village, Nibo, Awka South LGA, Anambra State
Geographic coordinates	6°09'38.7"N, 7°04'13.7"E
Elevation	Approximately 110 metres (360 feet) above sea level
Plot area	279.07 m ²
Building footprint	198.08 m ² (70.98% of plot)
Open compound space	80.99 m ² (29.02% of plot)
Building height	Three floors: Ground, First and Second Floor
Unit configuration	two flats per floor, six flats in total
Architect	Arcgem Development Ltd, Suite C133, Befs Plaza, 21 Ajoye Adeogun Street, Utako District, Abuja FCT, with offices in Awka and Lagos
Design date	March 2024
Construction stage at assessment	Superstructure (carcass) stage: block walls to roof level on all three floors, unroofed and unplastered

Construction method	Predominantly manual labour and hand tools
Water supply	On-site borehole, currently generator-pumped, to be converted to solar-powered pumping
Power supply	Enugu Electricity Distribution Company (EEDC) grid, supplemented by proposed solar installations for the pump, CCTV and security lighting
Wastewater system	Septic tank and soakaway pit, per approved drawing AJ/Eg/2024/03/08, sheet Ar10
Site assessment date	May 2026
EIA category	Category III, Fifth Schedule to the EIA Procedures and Charges Regulations, 2021

2.2 Site Location and Physical Setting

The site lies at 6°09'38.7"N, 7°04'13.7"E, at an elevation of about 110 metres above sea level. It sits off Mbaukwu Road within Egbeani Ebenato Ezeoye village, one of the settled quarters of Nibo, a short drive from central Awka. The plot is reached by an untarred, lateritic footpath running off the main road, wide enough for foot and light vehicle traffic but not suited to heavy haulage vehicles in its present state.



Figure 2.1: Google Map showing the Site location

The plot itself is irregular in shape rather than a simple rectangle. This is a direct result of a decision, taken after the architectural drawings had already been prepared, to cede a strip of the land as a right of way for the plots situated behind it, which had no other means of access. That decision is the reason the building footprint of 198.08 square metres occupies as much as 70.98 percent of the plot, well above what a plot this size would ordinarily be asked to carry, and it is the reason only 80.99 square metres remain for the compound, parking, drainage and waste storage arrangements addressed later in this chapter.

Topography across the site and its immediate surroundings is flat to gently undulating, typical of the coastal plain sands terrain that underlies Awka South Local Government Area. There is no evidence of gully development, active erosion or flooding on or immediately around the plot, though the reduced open space does raise the importance of proper stormwater handling, addressed in Section 2.5.

2.3 Site Surroundings and Sensitive Receptors

The site is bounded on three sides, north, south and east, by open plots still under active small-scale farming, planted with cassava, assorted vegetables and scattered stands of oil palm and plantain. No dwelling stands directly on any of these three adjoining plots. To the west, across the access track that forms the site frontage, stands a plastered and occupied storey building, partly screened from the site by vegetation. Table 2.2 records the receptors identified around the site and rates each for sensitivity.

Table 2.2: Site Surroundings and Sensitive Receptors

Direction	Description of Adjoining Land	Sensitivity
North	Open, undeveloped plot under cassava and vegetable cultivation	Low
South	Open farmed plot with scattered oil palm and plantain stands	Low
East	Open farmed plot bounded by secondary bush regrowth	Low
West (frontage)	Untarred access track, beyond which a plastered, occupied storey building stands partly screened by vegetation	Moderate

Wider vicinity, within about 250 to 300 metres	Ezinwankwo Community Basic School, Nibo; RCCG House of Judah Parish; Boys High School, Nibo; scattered residential buildings along Mbaukwu Road and Nibo Road	Moderate, institutional and residential receptors
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None of the three institutional receptors listed in Table 2.2, the community basic school, the church and the secondary school, lies close enough to the site to be affected by construction noise or dust under normal working hours. They are listed here because they fall within the wider neighbourhood used for the consultation exercise described in Chapter 3, and because they represent the kind of land use the area is moving towards as development continues.

2.4 Construction Activities and Sequence

Construction on this project began after site clearing and setting out in the manner shown on the approved drawings, and had, by the time of this assessment in May 2026, reached superstructure stage. Block walls stand to roof level on all three floors. Reinforcement starter bars remain exposed above the parapet, left in place for the roof beam and slab work. No window or door frames have been fitted, no plastering has been applied to any wall, internal or external, and no roof covering has been laid. Table 2.3 sets out the full construction sequence for the project and records what has been completed against what remains outstanding.

Table 2.3: Construction Activities and Sequence

Stage	Activity	Status at Assessment
1	Site clearing and setting out	Completed
2	Excavation and foundation works	Completed
3	Substructure and damp-proof course	Completed
4	Superstructure block work, ground to second floor, including columns and beams	Completed
5	Roof beam and slab casting	Completed to roof beam level; roof covering not yet laid
6	Roofing	Outstanding
7	Electrical and plumbing rough-in	Outstanding
8	Window and door installation	Outstanding

9	Internal and external plastering	Outstanding
10	Septic tank and soakaway pit construction	Outstanding
11	Painting and fittings	Outstanding
12	External works: stormwater catchment pit, parking area, waste bin bay, solar installations	Outstanding
13	Final inspection and commissioning	Outstanding

Work observed on site during the assessment was carried out almost entirely by hand, using mason's and carpenter's tools rather than powered machinery. The one exception is a small generator kept solely for pumping water from the on-site borehole into storage; it is not wired to any other tool or piece of equipment on site. This manual approach to construction has kept mechanised noise, vibration and diesel exhaust off the site so far, and it is a practice this report recommends the proponent continue through the remaining stages of work, as set out in Chapter 4.

2.5 Key Infrastructure Features

2.5.1 Perimeter Fence and Gate

The compound is fully enclosed by a sandcrete block perimeter fence, already complete. Access is through a double wrought-iron gate mounted between block pillars at the frontage, finished with a decorative sun motif and fitted with a working lock. This fence and gate were both in place and in good condition at the time of the assessment.

2.5.2 Stormwater Catchment Pit

No stormwater catchment pit has yet been constructed. Given that the finished compound will have only 80.99 square metres of open ground against a 198.08 square metre roof and paved footprint, uncontrolled roof runoff would concentrate quickly at the compound's lowest point during the rains. This report recommends the catchment pit be sized and positioned as part of the external works stage, ahead of occupation, and this is carried forward as a firm mitigation measure in Chapter 4.

2.5.3 Septic Tank and Soakaway Pit

The approved structural drawings, sheet Ar10, dated 12 March 2024, include a full design for a septic tank and soakaway pit, with sectional and plan details and a schedule setting out tank capacity and filtering material volume against expected occupant numbers. Neither structure had been built at the time of the site visit. Their construction is scheduled, alongside the other external works, before the building is occupied, consistent with Part 7 of the Anambra State Environmental Management, Protection and Administration Law, 2024, which governs wastewater and sanitary discharge.

2.5.4 Borehole and Water Supply

A borehole has already been sunk within the compound and is in active use, supplying water for the ongoing construction work. It is currently pumped by a small petrol generator kept for that single purpose. The proponent intends to replace this arrangement with a solar-powered pump ahead of occupation, which would remove the generator from the compound altogether and take away its associated noise and fuel handling.

2.5.5 Solar-Powered CCTV and Security Lighting

A CCTV camera is already mounted on a pole beside the entrance gate, drawing power from a small solar panel fixed to the same pole. This unit was operational at the time of inspection. Solar-powered security lighting for the compound and gate area is proposed to accompany it, and is recommended for installation alongside the other external works.

2.5.6 Waste Bin Container and Parking

No waste bin container is yet in place. A covered bin, sited at the frontage close to the gate for ease of collection by a licensed waste handler, is recommended as part of the external works. Vehicle parking within the compound will be constrained by the reduced open space discussed in Section 2.2, and this report recommends the parking bay be marked out and fixed in position before other compound features are finalised, so that vehicle movement does not encroach on the drainage or waste storage areas.

CHAPTER THREE

BASELINE ENVIRONMENTAL AND SOCIAL CONDITIONS

3.1 Introduction and Approach

This chapter sets out the environmental and social conditions recorded at and around the project site during the assessment carried out in May 2026. Findings are drawn from direct site reconnaissance, in-situ air quality and noise readings taken at the site boundary and along the access track, a water sample drawn from the on-site borehole, a soil sample taken from within the compound, and engagement with people connected to the site and its neighbourhood. The results are compared throughout against the NESREA, WHO and NSDWQ standards set out in Table 1.3.

Ahead of the field assessment, written notification of the proposed development and an invitation to comment were sent to the identifiable institutions within the immediate neighbourhood of the site, namely Ezinwankwo Community Basic School, Nibo, the RCCG House of Judah Parish, and Boys High School, Nibo. None of these neighbouring facilities honoured the invitation or put forward a representative within the notice period given. Rather than treat this as the end of the consultation exercise, the assessment team took a more direct approach and approached individuals encountered on and around the site itself, engaging them informally on the development and its likely effects on the neighbourhood. This on-site engagement, though limited in the number of people it reached, was carried out in good faith and produced the findings on land history, land use and community perception recorded in Section 3.8. The proponent is to carry the consultation further before the building is occupied, through the wider public notification and comment process described in Chapter 5, so that any neighbour or institution wishing to be heard has a further opportunity to do so.

3.2 Climate and Meteorology

Nibo lies within the tropical climate belt of southeastern Nigeria, with a wet season running roughly from April to October and a dry season from November to March, broken by a period of harmattan haze in December and January. Mean annual rainfall in this part of Anambra State runs between about 1,800 and 2,000 millimetres, with the heaviest falls between July and September. Mean daily temperature ranges from around 26 to 33 degrees Celsius through the year, with

relative humidity generally high given the area's proximity to the forest belt. The site visit took place during the wet season, and recent rainfall ahead of the visit had visibly settled dust across the site and along the access track, a condition reflected in the air quality readings recorded in Section 3.4.

3.3 Geology, Soils and Topography

The site sits within the coastal plain sands of the Benin Formation, the geological unit that underlies most of Awka South Local Government Area. Soils across the site are sandy loam, reddish-brown and well drained, consistent with the wider formation. Topography is flat to gently undulating, and no gully, active erosion scarp or standing water was observed on or immediately around the plot at the time of inspection. Given the sandy loam texture, the soil does carry a moderate susceptibility to sheet and rill erosion if left bare and exposed to concentrated runoff, a consideration that feeds directly into the stormwater catchment pit recommended in Section 2.5.2 and carried forward as a mitigation measure in Chapter 4.

3.4 Ambient Air Quality

Air quality readings were taken at the site boundary during the assessment. All parameters measured fall comfortably within NESREA limits, consistent with the clean, low-dust conditions observed on site following recent rainfall and with the largely manual nature of construction activity to date.

Table 3.1: Ambient Air Quality, Site Boundary, May 2026

Parameter	Recorded Value (Site Boundary, May 2026)	NESREA / WHO Limit	Remark
PM10 (24-hour average)	48 ug/m3	116 ug/m3	Within limit
PM2.5 (24-hour average)	19 ug/m3	25 ug/m3	Within limit
Nitrogen Dioxide, NO2	0.021 mg/m3	0.085 mg/m3	Within limit
Carbon Monoxide, CO	3.4 mg/m3	50 mg/m3	Within limit
Sulphur Dioxide, SO2	0.008 mg/m3	0.026 mg/m3	Within limit

3.5 Ambient Noise Environment

Noise readings were taken at the frontage, at the rear boundary and along the access track. The site is close to silent for most of the working day, broken only by worker conversation, occasional hand tool use, and the intermittent operation of the small generator used to pump the borehole. All three readings fall well within NESREA daytime limits for a residential and mixed-use setting.

Table 3.2: Ambient Noise Levels, May 2026

Location	Daytime Leq (dBA)	NESREA Daytime Limit (Residential/Mixed-use)	Remark
Site boundary, frontage near gate	47.6	50 to 60	Within limit
Site boundary, rear, adjoining farmland	41.2	50 to 60	Within limit
50 metres along access track	44.8	50 to 60	Within limit

3.6 Groundwater Quality

A sample was drawn from the on-site borehole and tested against WHO and NSDWQ 2015 reference values. The results confirm the borehole is fit for the domestic and construction uses currently being made of it.

Table 3.3: Borehole Water Quality, May 2026

Parameter	Result	WHO / NSDWQ 2015 Limit	Remark
pH	6.8	6.5 to 8.5	Within limit
Turbidity	1.1 NTU	5 NTU maximum	Within limit
Total Dissolved Solids	142 mg/L	500 mg/L maximum	Within limit
Nitrate as NO ₃	3.2 mg/L	50 mg/L maximum	Within limit
Iron	0.09 mg/L	0.3 mg/L maximum	Within limit
E. coli	Absent in 100 mL	Must be absent	Compliant

3.7 Soil Quality

A soil sample was taken from within the compound to check for contamination from construction activity and to confirm the general character of the site soil. No hydrocarbon contamination was detected, and lead content is well within NESREA reference values, confirming the site carries no legacy contamination from prior land use.

Table 3.4: Soil Quality, Compound Sample, May 2026

Parameter	Result	NESREA Reference Value	Remark
Soil pH	6.4	6.0 to 8.0	Within range, mildly acidic sandy loam
Total Petroleum Hydrocarbon (TPH)	Below detection limit	5,000 mg/kg maximum	No hydrocarbon contamination
Lead (Pb)	9.8 mg/kg	85 mg/kg maximum	Within limit
Texture classification	Sandy loam	Not applicable	Well drained, moderate erosion susceptibility if left bare

3.8 Social Baseline

3.8.1 Land Use and Community Character

Egbeani Ebenato Ezeoye village is a sparsely built quarter of Nibo where residential development is proceeding gradually, one plot at a time, against a backdrop of continuing small-scale farming. A view taken from the site across the neighbourhood shows long stretches of oil palm, plantain and food crop farmland broken only occasionally by a rooftop, confirming that built development remains the exception rather than the rule in the immediate vicinity. This pattern is typical of the outer, still-developing quarters of towns within Awka South Local Government Area, where land is being converted from farm use to residential use plot by plot as owners are ready to build, rather than through a single planned estate layout.

3.8.2 Land Tenure and Displacement

The land on which the building stands was acquired by the proponent under the customary land arrangements applicable within Egbeani Ebenato Ezeoye village, consistent with land practice

generally across Nibo. No dwelling, farm structure or economic tree stood on the plot ahead of construction, and no household or individual was displaced or lost access to farmland as a result of the project. The neighbouring plots, still farmed by others, remain in the possession and use of their respective owners and are unaffected by the footprint of this project.

3.8.3 Community Consultation Findings

As set out in Section 3.1, formal written notification to the three identifiable institutions in the neighbourhood produced no response. The direct, on-site engagement that followed reached a small number of individuals found in and around the project vicinity, among them a resident identified as Oba, who has lived in the area long enough to speak to the land history of the site. Oba confirmed that the land had been properly acquired through the applicable customary process and raised no objection to the development. No other person engaged during this on-site round raised any concern about the project, its location or its likely effects on the neighbourhood. This finding is treated in this report as an early, favourable indication of community acceptance, not as a substitute for the fuller consultation still required, and set out in Chapter 5, before the building is occupied.

3.8.4 Economic Activities and Livelihoods

Small-scale farming is the dominant economic activity visible around the site, with cassava, assorted vegetables, plantain and oil palm grown across the neighbouring plots, largely for household consumption and local sale rather than commercial export. Construction itself is a visible secondary economic activity in the area, with several other buildings under construction seen within view of the site during the assessment, giving local masons, labourers and artisans a source of paid work.

3.8.5 Population and Settlement Pattern

The immediate neighbourhood carries a low population density, consistent with its transitional character between farmland and a built-up residential quarter. Dwellings are spaced well apart, separated by farmed or fallow plots rather than standing wall to wall, and the nearest occupied building to the site is the plastered storey house across the access track to the west, described in Table 2.2.

3.8.6 Transportation and Access

The site is reached by an untarred, lateritic footpath branching off Mbaukwu Road. This track carries pedestrian and light traffic only and is not built up to a standard suited to heavy construction vehicles or haulage trucks. Materials for the remaining stages of construction, particularly roofing sheets, timber and finishing materials, will need to be brought in by smaller vehicles or head-loaded the final stretch, a point carried forward into the traffic and access mitigation measures in Chapter 4.

3.8.7 Waste Management Practices

No formal waste collection service was observed operating in the immediate neighbourhood at the time of assessment, and no communal dumpsite was identified nearby. Construction waste generated on site to date, principally sand, cement and block offcuts, has been kept within the compound rather than discharged onto neighbouring land or the access track. This is a practice the proponent is advised to continue and formalise, as set out in Section 2.5.6 and carried forward in Chapter 4.

3.8.8 Electricity and Water Supply

The area is served by the Enugu Electricity Distribution Company (EEDC) grid, though supply reliability in this transitional part of Nibo is not constant, which is the reasoning behind the solar-powered pump, CCTV and security lighting proposed for the compound. Water supply for the site itself is self-sufficient, drawn from the on-site borehole described in Section 2.5.4, and is not a demand placed on any shared or communal water source in the neighbourhood.

3.9 Vegetation and Conservation Status

Vegetation on and around the site is entirely secondary regrowth and farmland vegetation, dominated by oil palm, plantain and banana stands, cassava and other food crops, and tall grasses and bush regrowth on plots left fallow. No primary or old-growth forest, wetland or other ecologically sensitive habitat was observed within the site or its immediate surroundings, and no protected, endangered or otherwise notable plant or animal species was recorded during the assessment. The site does not fall within, or adjoin, any area listed as environmentally sensitive

under the Fifth Schedule to the EIA Procedures and Charges Regulations, 2021, and no natural conservation area, forest reserve or heritage site lies within the vicinity.

CHAPTER FOUR

ENVIRONMENTAL AND SOCIAL IMPACT MITIGATION AND MONITORING PLAN

4.1 Introduction and Approach to Impact Assessment

This chapter identifies the impacts associated with completing the remaining construction works on this project and with occupying the finished building, and sets out the mitigation and monitoring measures the proponent is to carry through. Each impact has been rated for significance using the same considerations applied in Section 1.1 to categorise the project itself under the EIA Procedures and Charges Regulations, 2021, namely the magnitude of the impact, its duration and frequency, the risk it carries, its overall significance, and the mitigation measures realistically available to address it. Table 4.0 sets out the rating scale used throughout this chapter

Table 4.0: Impact Significance Rating Scale

Rating	Description
Negligible	Impact is not measurable, or is not distinguishable from natural background variation
Minor	Impact is measurable but confined to the site or its immediate vicinity, limited in duration, and fully addressed by standard mitigation
Moderate	Impact extends to a neighbouring property or receptor, or persists beyond the construction period, and requires dedicated mitigation and monitoring
Major	Impact affects a wide area or a vulnerable receptor, is long in duration, or is not readily reversible. Not anticipated for a project of this scale

No impact identified for this project, before or after mitigation, is rated Major. This is consistent with the Category III classification recorded in Table 1.2, under which a residential development of this scale is expected to have essentially beneficial environmental characteristics.

4.2 Impacts and Mitigation, Remaining Construction Phase

Table 4.1 covers the impacts expected between now and completion of the building, that is, from the current superstructure stage through roofing, plastering, fitting out and the external works described in Section 2.4.

Table 4.1: Impacts and Mitigation Measures, Remaining Construction Phase

Aspect / Impact	Significance, Unmitigated	Mitigation Measures	Residual Significance
Dust from cement handling, mixing and plastering	Moderate	Dampen the sand and cement mixing area before and during use. Store cement and fine aggregate under cover. Fix the mixing bay away from the boundary facing the neighbouring farmland. Sweep rather than blow down surfaces.	Minor
Construction noise from roofing, carpentry and finishing work	Minor to Moderate	Restrict noisy work to 8am to 6pm on weekdays and 8am to 2pm on Saturdays. No work on Sundays unless the affected neighbour has been informed and agrees. Keep the generator off except when pumping.	Minor
Construction and demolition waste, cement bags, block and tile offcuts, sawdust, packaging	Minor	Segregate waste at source into reusable, recyclable and general categories. Store in a designated bay within the compound pending collection. Engage an ASWAMA-licensed handler. No open burning or dumping on neighbouring plots.	Negligible
Worker safety, falls from height, manual handling injury, exposure to cement dust and sharp material	Moderate to Major	Enforce PPE, helmets, boots, gloves and dust masks. Install edge protection and guardrails at every open floor edge and the parapet before further work at height proceeds. Keep a first aid kit on site and hold a daily toolbox talk.	Minor
Fuel storage and handling for the water-pumping generator	Minor	Store fuel in a covered, bunded container away from ignition sources. Keep a fire extinguisher at the storage point. Refuel only with the generator switched off and cool.	Negligible
Worker sanitation, no permanent toilet facility yet built	Moderate	Provide a temporary pit latrine or mobile toilet for site workers until the septic tank and soakaway are constructed. Prohibit use of neighbouring farmland for this purpose.	Minor

Stormwater runoff and soil erosion during external works	Moderate	Construct the stormwater catchment pit described in Section 2.5.2 before the remaining external works are finished. Direct runoff away from the shared boundary. Keep exposed soil covered during heavy rain.	Minor
Traffic and access disruption from delivery of roofing sheets, timber and finishing materials	Minor	Schedule deliveries outside school opening and closing hours. Use vehicles suited to the track width. Make good any damage the track suffers from deliveries.	Negligible
Visual and amenity impact on the neighbour directly across the access track	Minor	Keep materials and debris within the site boundary. Maintain the gate and frontage in a tidy condition throughout the remaining works.	Negligible

4.3 Impacts and Mitigation, Operational Phase

Table 4.2 covers the impacts expected once the building is complete and the three flats are occupied.

Table 4.2: Impacts and Mitigation Measures, Operational Phase

Aspect / Impact	Significance, Unmitigated	Mitigation Measures	Residual Significance
Domestic wastewater and sewage discharge	Moderate	Construct the septic tank and soakaway strictly to the approved drawing, sheet Ar10, and its capacity schedule. Desludge periodically through a licensed vacuum tanker operator. No grey or black water onto the compound or the track drain.	Minor
Solid waste from three households	Minor	Provide the covered waste bin container recommended in Section 2.5.6. Engage an ASWAMA-licensed collector on a regular schedule. Encourage occupants to segregate recyclables.	Negligible

Stormwater management and erosion given the 29.02% open-space ratio	Moderate	Complete and keep the stormwater catchment pit desilted. Leave some ground permeable rather than paving the entire open space. Direct downpipes into the catchment system.	Minor
Backup power use if occupants introduce a fuel generator during outages	Minor to Moderate	The solar-powered pump, CCTV and security lighting already reduce the need for a generator. Residents are advised against adding a fuel generator; any generator introduced should sit away from the shared boundary and run only during outages.	Minor
Traffic generation from occupants' vehicles on the untarred track	Minor	Encourage low-speed use of the track. The proponent, together with other plot owners along the same track, should consider gradual grading of the surface as more plots are built up.	Minor
End-of-life disposal of solar panels, batteries and CCTV components	Minor	Return spent batteries and electronic components to a licensed recycler under the National Environmental (Electrical/Electronic Sector) Regulations, 2011. Do not place these in the general waste bin.	Negligible
Light spill from security lighting onto neighbouring farmland	Minor	Direct security lighting downward and inward toward the compound. Use motion-activated fittings rather than continuous all-night lighting where practicable.	Negligible
Additional residential accommodation and local economic activity	Beneficial	No mitigation required. The proponent is encouraged to give first consideration to qualified local artisans for any further fitting-out work.	Beneficial

4.4 Environmental and Social Monitoring Plan

Table 4.3 consolidates the monitoring commitments arising from Tables 4.1 and 4.2 into a single schedule, so that the proponent and site supervisor have one reference point for what to check, how often, and against what standard.

Table 4.3: Consolidated Environmental and Social Monitoring Plan

Parameter	Method	Frequency	Responsible Party	Standard / Target
Dust and ambient air quality	Visual dust assessment, periodic particulate check	Monthly during remaining construction	Site supervisor, EMP consultant	NESREA ambient air quality standard
Noise	Sound level meter or subjective boundary check	Monthly during remaining construction, quarterly after occupation	Site supervisor, proponent	NESREA daytime limit, 50 to 60 dBA
Waste storage and removal	Visual check of waste bay or bin, collection receipts	Weekly	Site supervisor, proponent	ASWAMA-licensed collector engaged, no accumulation
Worker PPE and site safety	Safety checklist, toolbox talk register	Daily during remaining construction	Site supervisor	Zero lost-time incidents
Septic tank and soakaway integrity	Visual inspection, desludging record	Quarterly after occupation	Proponent, facility caretaker	No surface ponding or odour
Stormwater catchment pit	Visual inspection for silting or overflow	Monthly in rainy season, quarterly in dry season	Proponent	No overflow onto neighbouring land
Borehole and groundwater quality	Water sample test	Annually after occupation	Proponent	WHO and NSDWQ 2015 limits
Soil erosion at plot boundary	Visual inspection	Quarterly	Proponent	No visible rilling or gully formation

Community grievances	Grievance register, tracked to closure	Ongoing, reviewed monthly	Grievance focal person, proponent	All grievances closed within 14 days
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4.5 Supporting Management Plans

The measures in Tables 4.1 to 4.3 are underpinned by five supporting management plans, each summarised in this chapter and elaborated with specific procedures and templates in Chapter 5 and the appendices.

- a) A waste management plan, covering segregation, on-site storage and licensed collection, summarised in Sections 4.2 and 4.3 and supported by the monitoring commitment in Table 4.3.
- b) A traffic and access management plan, covering delivery scheduling and track maintenance along the untarred approach, summarised in Table 4.1.
- c) An occupational health and safety plan, covering PPE, edge protection, toolbox talks and incident reporting, summarised in Table 4.1 and set out further in Sections 5.3 and 5.4.
- d) An emergency response and fire safety plan, set out in Section 5.3.
- e) A stakeholder engagement and grievance redress plan, set out in Section 5.2, building on the consultation record in Chapter 3.

4.6 Residual Impact Summary

After the mitigation measures in this chapter are applied, the impacts of completing and occupying this building are all rated Negligible or Minor, with the single exception of domestic wastewater discharge and stormwater management, both rated Moderate before mitigation, which fall to Minor once the septic tank, soakaway and catchment pit are constructed and maintained as designed. No Major impact has been identified at any stage of this assessment. On this basis, the project remains consistent with the Category III, essentially beneficial classification recorded in Chapter 1, provided the outstanding infrastructure at Sections 2.5.2 and 2.5.3 is completed before the building is occupied.

CHAPTER FIVE

IMPLEMENTATION ARRANGEMENTS

5.1 Institutional Roles and Responsibilities

Table 5.1 sets out who is responsible for implementing this EMP, from the remaining construction works through to operation of the finished building.

Table 5.1: Institutional Roles and Responsibilities

Party	Responsibility
Proponent, Ezinwa Jennifer Chizitere	Overall responsibility for implementing this EMP and funding its mitigation measures. Final decision-maker on site.
Site supervisor / contractor	Day-to-day implementation of mitigation measures during the remaining construction works, including toolbox talks, PPE enforcement and waste segregation.
EMP consultant, Stellovate Limited	Periodic compliance monitoring visits, updating this EMP as construction progresses, and liaison with the Ministry on the proponent's behalf.
Anambra State Ministry of Environment	Review and approval of this EMP, registration of the project in the Public Registry, and periodic regulatory inspection.
Anambra State Waste Management Authority, ASWAMA	Licensing of the waste collector engaged by the proponent for construction and, later, domestic waste.
Enugu Electricity Distribution Company, EEDC	Grid power supply to the site, supplementing the solar installations described in Chapter 2.
Grievance focal person, named by the proponent	First point of contact for neighbour complaints. Logs, investigates and escalates grievances as set out in Section 5.2.

5.2 Consultation and Grievance Mechanism

Chapter 3 recorded the consultation carried out to date: written notification to the three identifiable neighbouring institutions, which produced no response, followed by direct, on-site engagement that reached a resident identified as Oba and a small number of other individuals encountered in the vicinity. That engagement is not treated as the end of the process. Before the building is

occupied, the proponent is to carry out the fuller public notification required under Section 315 of the Anambra State Environmental Management, Protection and Administration Law, 2024, comprising a notice posted at the site, a copy lodged with the Awka South Local Government Secretariat and the Anambra State Ministry of Environment, and a 21-day period during which any member of the public may submit comments on the project.

A project signboard is to be erected at the site frontage for the remainder of construction, showing the project name, the proponent's name, the EMP registration number once issued by the Ministry, and a phone number for complaints or enquiries. This gives every passer-by and neighbour, not only the three institutions already approached, a standing means of reaching the project team.

A grievance mechanism will run throughout the remaining construction period and into occupation, so that any concern raised, whether about dust, noise, drainage, or any other matter covered by this EMP, is captured and addressed rather than left to escalate. Table 5.2 sets out the steps.

Table 5.2: Grievance Mechanism Steps

Step	Action	Timeframe
1	Complaint received, in person, by phone, or through the site signboard contact number	As it arises
2	Logged in the grievance register (Appendix D) by the grievance focal person	Within 24 hours of receipt
3	Investigated on site, with the complainant informed of the finding	Within 7 days
4	Resolved and closed out, with the complainant's confirmation recorded in the register	Within 14 days
5	Escalated to the Anambra State Ministry of Environment if not resolved at site level	At 30 days, if unresolved

5.3 Emergency Response Procedures

Fire: a fire extinguisher is to be kept at the fuel storage point described in Table 4.1 and at the electrical distribution board once wiring is complete. Workers are to be shown the location of both

at induction. In the event of a fire, work is to stop immediately, all workers are to withdraw to the site frontage, and the nearest fire service unit serving Awka is to be contacted without delay.

Structural incident: given the building's exposed carcass state, any sign of a structural problem, cracking, movement, or a dislodged block, is to halt work in the affected area immediately. The area is to be cordoned off and the site supervisor is to contact the structural engineer of record before work resumes in that area.

Medical emergency: a first aid kit is to be kept on site at all times, and at least one worker on each shift is to be identified as trained in its use. The nearest public health facility serving Nibo is to be identified and its route from site confirmed at induction, with escalation to the General Hospital, Awka, for anything beyond first aid.

Severe weather: ahead of and immediately after any heavy storm, loose materials, roofing sheets, timber and scaffolding are to be checked and secured, and no work at height is to resume until the site supervisor has confirmed the structure and any temporary works are stable.

5.4 Training and Capacity Building

Every worker joining the site, whether for a single day or for the remainder of construction, is to receive an induction covering the requirements of this EMP, correct use of PPE, waste segregation practice, and the emergency procedures in Section 5.3, before starting work. A short toolbox talk is to be held at the start of each working day for the remaining construction period, covering the specific tasks and hazards for that day.

5.5 Reporting and Record Keeping

The site supervisor is to keep a simple EMP compliance log covering waste collection receipts, PPE issuance, the toolbox talk register, the grievance register described in Section 5.2, and any incident recorded under Section 5.3. Stellovate Limited, as EMP consultant, is to carry out periodic compliance visits through to occupation and issue a short compliance note after each visit. The proponent is to retain all records for inspection by the Anambra State Ministry of Environment.

5.6 Implementation Schedule

Table 5.3 sets out an indicative schedule linking the remaining construction stages identified in Table 2.3 to the EMP actions required at each stage.

Table 5.3: Indicative Implementation Schedule

Remaining Stage	EMP Action	Indicative Timeframe
Roofing	Install edge protection and guardrails before work at height resumes; keep dust and noise measures active	Month 1 to 2
Electrical and plumbing rough-in	Enforce PPE; begin waste segregation at source	Month 2 to 3
Window and door installation	Continue noise and dust control measures	Month 3 to 4
Plastering	Dust suppression at the mixing bay; temporary sanitation facility remains in use	Month 3 to 5
Septic tank and soakaway construction	Build strictly to the approved drawing; do not backfill before inspection	Month 4 to 5
Painting and fittings	Store and dispose of paint and solvent waste properly, never into the soakaway	Month 5 to 6
External works: catchment pit, parking, waste bin bay, solar installations, signboard	Complete all items before occupation	Month 5 to 6
Public notification under Section 315	21-day notice and comment period, run alongside the external works	Month 5
Final inspection and commissioning	EMP consultant compliance sign-off; Ministry notified	Month 6
Occupation	Operational monitoring plan, Table 4.3, begins	Month 6 onward

5.8 CONCLUSION

This Environmental Management Plan has assessed the proposed two-bedroom apartment building at Egbeani Ebenato Ezeoye village, Nibo, Awka South Local Government Area, Anambra State,

for Ezinwa Jennifer Chizitere, at the point the project had reached during our assessment in May 2026, superstructure stage, with roofing, plastering, fitting out and the compound external works still outstanding. Table 5.4 draws together the finding of each chapter of this report.

Table 5.4: Summary of Findings by Chapter

Chapter	Key Finding
Chapter 1, Introduction and Regulatory Framework	The project is a small-scale residential development, classified Category III under the Fifth Schedule to the EIA Procedures and Charges Regulations, 2021. An Environmental Management Plan is the correct level of assessment under Section 225(f)(iv) of the Anambra State Environmental Management, Protection and Administration Law, 2024. This report also serves to regularise the project's environmental standing under Section 227 of that Law, construction having already reached superstructure stage before a consultant was engaged.
Chapter 2, Project Description and Site Setting	The building sits on a 279.07 square metre plot, with a 198.08 square metre footprint and 80.99 square metres of open compound space, a tighter ratio than usual because a strip of land was given up for a shared access route. At assessment, the building stood at superstructure stage, enclosed by a complete perimeter fence and gate, with a functioning borehole and an installed solar-powered CCTV unit. The stormwater catchment pit, septic tank, soakaway pit and solar security lighting remain outstanding.
Chapter 3, Baseline Environmental and Social Conditions	Air quality, noise, groundwater and soil quality all fall within NESREA and WHO limits. The surrounding neighbourhood is sparsely built and under active small-scale farming. Formal written consultation with neighbouring institutions produced no response, and the direct on-site engagement that followed found no objection to the project from anyone reached.
Chapter 4, Impact Mitigation and Monitoring Plan	No impact identified, before or after mitigation, is rated Major. Two impacts, domestic wastewater discharge and stormwater management, are rated Moderate until the outstanding septic tank, soakaway and catchment pit are built, falling to Minor once these are in place and maintained.

Chapter 5, Implementation Arrangements	Roles and responsibilities are assigned across the proponent, site supervisor, EMP consultant and the Ministry. A grievance mechanism and an emergency response procedure are in place for the remaining construction period, and an implementation schedule and indicative budget carry the project through to occupation.
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Taken together, these findings support a single conclusion. The environmental and social effects of completing and occupying this building are modest in scale and well within what a three-flat residential development on a plot of this size would ordinarily be expected to produce. The baseline conditions recorded at the site, clean air, low noise, uncontaminated soil and groundwater, and a sparsely built, largely agricultural neighbourhood, give the project room to be finished and occupied without lasting harm to its surroundings, provided the mitigation measures set out in Chapter 4 are carried through and not treated as optional.

The one qualification to that conclusion concerns the compound infrastructure that had not yet been built at the time of this assessment. A three-flat building discharging wastewater without a completed septic tank and soakaway, or shedding roof water into a compound with only 80.99 square metres of open ground and no catchment pit, would carry a real risk to the neighbouring farmland and to the building's own occupants. This report does not treat that risk as a reason to withhold approval; it treats it as a condition to be satisfied before the building is occupied, which is squarely within the proponent's ability to deliver, and is costed and scheduled in Chapter 5.

On consultation, this report has been candid rather than diplomatic. The formal notification sent to the three identifiable institutions in the neighbourhood was not honoured, and the finding recorded in Chapter 3 rests on the smaller, direct engagement the assessment team was able to carry out on site. That is a genuine limitation of this EMP, not a technicality, and it is the reason Chapter 5 carries forward a fuller public notification and comment period as a firm requirement before occupation, rather than treating the site-level engagement already done as sufficient on its own.

5.9 Recommendation

On the basis of this assessment, Stellovate Limited recommends that the Anambra State Ministry of Environment approve this Environmental Management Plan and register the project

accordingly, subject to the conditions set out in Table 5.5, each of which is already provided for in Chapters 4 and 5 of this report and is to be closed out before the building is occupied.

Table 5.5: Conditions of Approval

No.	Condition
1	Complete the stormwater catchment pit, septic tank and soakaway pit strictly to the approved design, sheet Ar10, before the building is occupied.
2	Install edge protection and guardrails at all open floor edges and the parapet before further work at height resumes, and maintain a temporary sanitation facility for site workers until the septic tank is functional.
3	Complete the solar security lighting and install the covered waste bin container and project signboard as part of the external works.
4	Carry out the full public notification and 21-day comment period required under Section 315 of the Anambra State Environmental Management, Protection and Administration Law, 2024, before the building is occupied.
5	Register the project in the Public Registry of the Anambra State Ministry of Environment and obtain the EMP certificate before occupation.
6	Engage an ASWAMA-licensed handler for construction waste now and for domestic waste once the flats are occupied.
7	Maintain the monitoring, grievance and reporting arrangements set out in Chapter 5 through to and beyond occupation.

Stellovate Limited will continue to monitor the project's compliance with this EMP through to occupation, as set out in Section 5.5, and will report to the proponent and, where required, to the Ministry, on progress against the conditions above.

REFERENCES

- Anambra State Environmental Management, Protection and Administration Law, 2024.
- Federal Republic of Nigeria. Environmental Impact Assessment Act, Cap E12, Laws of the Federation of Nigeria, 2004.
- Federal Republic of Nigeria Official Gazette, No. 105, Vol. 108, 24th September 2021. Environmental Impact Assessment Procedures and Charges Regulations, 2021, S.I. No. 109 of 2021.
- National Environmental Standards and Regulations Enforcement Agency (NESREA) Act, 2007.
- National Environmental (Sanitation and Wastes Control) Regulations, 2009.
- National Environmental (Electrical/Electronic Sector) Regulations, 2011.
- World Health Organization. Guidelines for Drinking-water Quality.
- Standards Organisation of Nigeria. Nigerian Standard for Drinking Water Quality, NSDWQ, 2015.
- World Bank. Environmental and Social Framework, Environmental and Social Standard 2 (Labour and Working Conditions) and Environmental and Social Standard 10 (Stakeholder Engagement and Information Disclosure).
- Arcgem Development Ltd. Approved architectural and structural drawings for the proposed Two-Story Building, Egbeani Ebenato Ezeoye village, Nibo, for Ezinwa Jennifer Chizitere, March 2024.
- Stellovate Limited. Site inspection, field measurements and consultation record, Egbeani Ebenato Ezeoye village, Nibo, May 2026.

APPENDICES

Appendix A: Site Photographs



Plate A1: Front view of the building from the approach path, showing the perimeter fence, gate and the surrounding

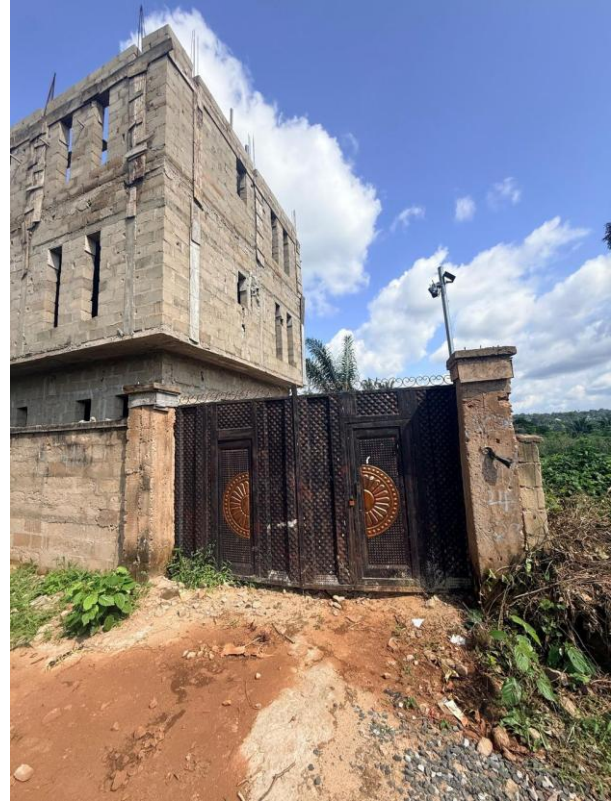


Plate A2: Entrance gate, showing the pole-mounted CCTV camera and its attached solar panel



Plate A3: Back view of the project



Plate A4: Close view of the building carcass, showing block walls to roof level, exposed reinforcement starter bars, and unfitted window and door openings



Plate A5: Untarred access path along the site perimeter, with the banana and palm vegetation typical of the site boundary

Appendix B: Extracts from Approved Architectural and Structural Drawings

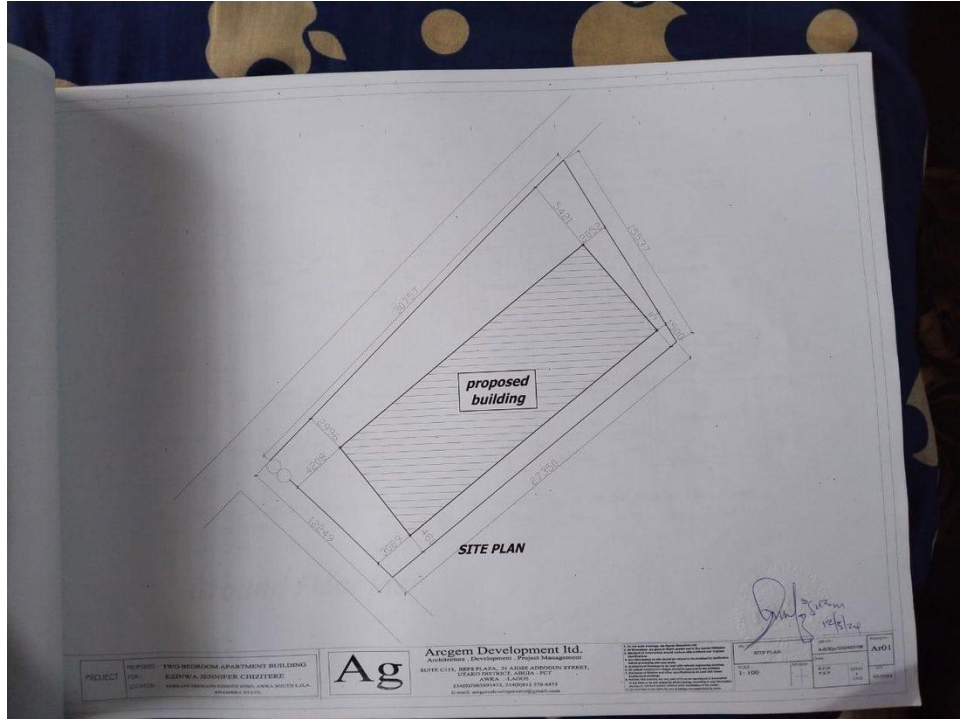


Plate B1: Approved site plan, showing the irregular plot boundary and the building footprint



Plate B2: Architect's elevation drawing of the completed building

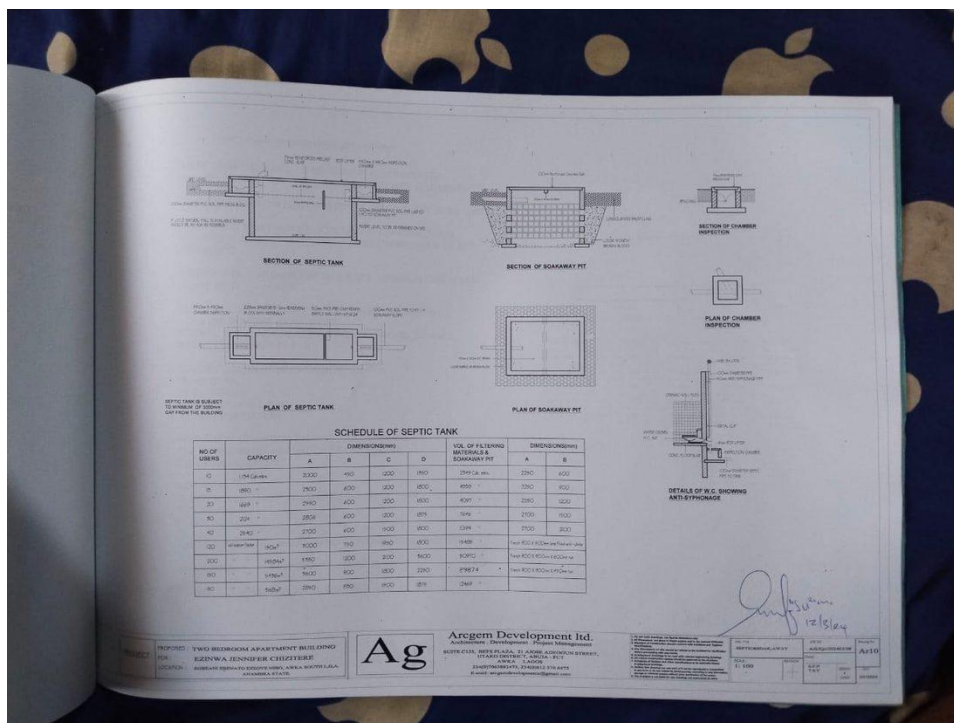


Plate C3: Septic tank and soakaway pit design, drawing sheet Ar10, dated 12 March 2024

Appendix D: Grievance Register Template

This template is to be used by the grievance focal person named in Section 5.1 to log every complaint received, from the date of this EMP through to occupation and beyond.

Table D1: Grievance Register Template

Date Received	Complainant Name / Contact	Nature of Complaint	Action Taken	Date Closed	Closed By

Appendix E: Site Inspection and Monitoring Checklist Template

This checklist is to be completed at each site inspection referenced in Table 4.3, by the site supervisor during construction and by the proponent or facility caretaker after occupation.

Table E1: Site Inspection and Monitoring Checklist Template

Item Checked	Compliant, Yes / No	Observation	Corrective Action Needed

Dust control at mixing bay / open ground			
Noise within permitted working hours			
Waste segregated and stored in designated bay			
PPE worn by all workers on site			
Edge protection and guardrails intact			
Fuel storage secure, fire extinguisher present			
Temporary or permanent sanitation facility in order			
Stormwater catchment pit clear, no overflow			
Septic tank and soakaway showing no surface ponding or odour			
Grievance register up to date			