

MARK GOLDSMITH
Chairperson
The Inspection Panel

July 12, 2024

IPN REQUEST 24/05

**MEMORANDUM TO THE EXECUTIVE DIRECTORS AND ALTERNATES OF THE
INTERNATIONAL DEVELOPMENT ASSOCIATION**

**Inspection Panel Notice of Non-Registration
on a
Request for Inspection**

Federal Republic of Nigeria: Ibadan Urban Flood Management Project (P130840)

Summary

1. In accordance with paragraph 18 of the Resolution of the Inspection Panel (the “Panel”)¹, I hereby inform you that on June 25, 2024, the Panel received a Request for Inspection (the “Request”) related to the World Bank-financed Nigeria: Ibadan Urban Flood Management Project (P130840) (the “Project”). The Request was submitted to the Panel by three individuals from Bodija, Ibadan North, Oyo, Nigeria.

2. The Request alleged that the Project has not complied with the World Bank’s Operational Policies and Procedures resulting in significant harm to their community. The Requesters claimed that Project-related construction activities led to a nearby water channel being blocked and the subsequent flooding damaged houses and properties, including shops, stores, food and clothes of the Requesters. The Request alleged that, since the flood, the Requesters have experienced disruptions to their livelihoods and businesses, resulting in a loss of their customers. The Requesters added that they are facing daily challenges due to the damage the flood caused to their home appliances. The Requesters stated that the compensation offered to them was significantly lower than their losses.

3. The Panel’s initial due diligence of the Request concluded that the Request met all admissibility criteria. On July 2, 2024, the Panel issued a Notice of Receipt on the Panel’s case website and informed the Bank Management about the Request. On July 11, 2024, Bank Management informed the Panel that the issues raised in the Request had been fully resolved and all due compensations had been paid to the Requesters. On the same day, the Panel received additional written information from the Requesters, stating that they received the compensation amounts, and that they were satisfied. The Panel considered that the issue that the Requesters

¹ The World Bank Inspection Panel, [Resolution No. Resolution No. IDA 2020-0003, September 8, 2020](#) (the “Resolution”).

had raised has now been resolved. Therefore, I am notifying you that the Panel is not registering this Request.

The Project

4. The Project was approved on June 17, 2014, by the World Bank Board for a total cost of US\$ 220 million. The Bank financed US\$ 200 million for the Project through International Development Association (IDA) investment project financing. The Borrower financed the counterpart funds of US\$ 20 million equivalent. The original closing date of the Project was July 30, 2023. The Project was restructured three times, and it closed on June 28, 2024. The Project was an Environmental Category A and triggered the following safeguard policies: Environmental Assessment (OP/BP 4.01), Natural Habitats (OP/BP 4.04), Physical Cultural Resources (OP/BP 4.11), Involuntary Resettlement (OP/BP 4.12), and Safety of Dams (OP/BP 4.37).

5. The Project Development Objective was to “*improve the capacity of Oyo State to effectively manage flood risk in the city of Ibadan*”². The Project consisted of three main components. Component 1 focused on flood risk identification, prevention, and preparedness measures with an objective to assess flood risk in the city of Ibadan, plan risk reduction measures, and finance both structural and non-structural preventive measures to enhance flood preparedness.³ Component 2 of the Project focused on flood risk reduction to mitigate flood risk through structural measures by financing public infrastructure investments for flood mitigation and drainage improvements.⁴ Component 3 of the Project focused on project administration and management support to finance incremental operational costs related to the implementation of the project for goods, equipment, staff, travel, and Project Management Unit’s consultant services.⁵

The Request

6. On June 25, 2024, the Request was submitted to the Panel by three residents of Odija, Ibadan North, Oyo, Nigeria, who claimed that the activities associated with the Bank-financed Project were causing harm to their community. The Request alleged that the Project has not complied with the World Bank’s Operational Policies and Procedures resulting in significant harm to their community.

7. The Request claimed that Project-related construction activities in Agodi, Ibadan has led to a water channel blocked near the Requesters’ residential area. Subsequent to the blocking of the water channel, a flood ensued in February 2024 which led to damage to their houses and properties, including shops, stores, food and clothes. The Request alleged that the flood led to a decline of their customer base, which disrupted their livelihoods and commercial activities. The

² World Bank Group, 2014. *Project Appraisal Document (PAD), Nigeria - Ibadan Urban Flood Management Project (English)*. Washington, D.C.: World Bank Group. Available at: <http://documents.worldbank.org/curated/en/536881468144274402/Nigeria-Ibadan-Urban-Flood-Management-Project> [Accessed July 7, 2024], p. 7, para. 24.

³ PAD, p. 9, para. 32.

⁴ PAD, p. 10, para. 33.

⁵ PAD, p. 11, para. 34.

Requesters alleged that they were facing ongoing daily hardships due to the damage of their home appliances caused by the floodwaters.

8. At the time of the Request, the Requesters stated that they had attempted to address their concerns with the Project authorities on several occasions, but their efforts have not yielded any satisfactory solution. The Request explained that a meeting was held with the Project's contractor, who acknowledged the Requesters' grievances and proposed a compensation at an amount they considered to be insufficient compared to the actual damages incurred by the flooding.

Panel's Observation and Determination

9. After receiving the Request and in accordance with its Operating Procedures, the Panel conducted its due diligence by reviewing the information contained in the Request and Project documents, as well as by speaking with the Requesters. The Panel verified that the Request is not frivolous, absurd, or anonymous, and was submitted by three Project-affected individuals from the Borrower's territory in the Project area. The Panel noted that the Requesters had contacted the World Bank Grievance Redress System (GRS) on June 13, 2024, with their grievances. The Panel noted that the subject matter of the Request does not concern issues of procurement and, at the time of receipt of the Request, the Project was 84.17 percent disbursed. The Panel has not previously made a recommendation on the issues raised in this Request.

10. On July 2, 2025, after verifying that it met all admissibility criteria, the Panel posted a Notice of Receipt on the Panel's website and informed the Bank Management. On July 11, 2024, Bank Management informed the Panel that, the Projects' contractor accidentally blocked a stormwater drain during rainfall, which caused a localized damage to a few dwellings. Management added that while the contractor has taken responsibility for the damage, it initially attempted to settle the matter without following the required protocol, failing to inform the PIU and offering inadequate compensation. It also added that it has since followed up with the PIU to ensure appropriate compensation is paid without further delay and that this compensation has now been paid. According to Management, the Bank team has also engaged directly with the PAPs, who have confirmed their satisfaction with the compensation. The Panel has also received written confirmation from the Requesters, confirming that they have now received adequate compensation and that they are fully satisfied.

11. The Panel acknowledges the action taken by Bank Management to address the allegations made in the Request. The Panel noted with appreciation that Bank Management promptly contacted the Requesters and ensured that adequate compensation was paid to the Requesters for their losses. The Panel therefore considers that the issue the Requesters raised has been addressed, and they are no longer adversely affected by the Project.

12. In light of the foregoing and in accordance with the Panel Resolution⁶ and its Operating Procedures, and after reviewing the information gathered through its own due diligence, I am

⁶ The World Bank Inspection Panel, [Resolution No. Resolution No. IDA 2020-0003, September 8, 2020](#) (the "Resolution").

informing you that the Panel is not registering this Request for Inspection. This non-registration does not preclude the possibility of a future Request for Inspection related to this Project.

Yours sincerely,

A handwritten signature in blue ink that reads "Mark E. Goldsmith". The signature is written in a cursive style and is centered on the page.

Mark Goldsmith
Chairperson

Attachment

Copy to:

Mr. Ajay Banga, President, International Development Association

Requesters

Attachment

**Request for Inspection
(Redacted)**

[REDACTED]

[REDACTED]

Bodija,
Ibadan North,
Oyo, Nigeria.

The Inspection panel
The World Bank
1818 H Street, NW
Washington, DC 20433
USA

Dear Members of the inspection panel,

I am writing to file a complaint regarding the Ibadan Urban Flood Management Project funded by the World Bank in Ibadan (Agodi). I believe that the project has not complied with the World Bank's operational policies and procedures, resulting in significant harm to my community.

The specific issue we have encountered is flooding of our compound and various rooms, shop and store. This issue has caused damages to our properties, including, clothing (babies and adult wears), foodstuffs, home appliances, shop goods and many more, the items and properties damaged list shall be attached below.

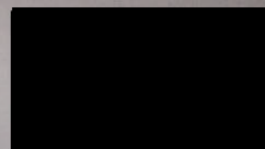
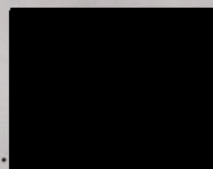
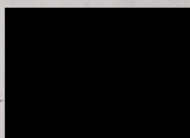
We have attempted to address these concerns with the project authorities on several occasions, but our efforts have not yield any solution. The contractor's [REDACTED] attention has been called in which a meeting was held and later, they came with a compensation of #10,000 each which doesn't commensurate the damages done by their work activities. Furthermore, the complaint was

directed to the client at the IUFMP office, yet no resolution, a legal litigation was made and till now, no response was made and the project is about winding off. Since, February when the incident occurred, we have suffered setback in our businesses, lost customers, living without appliances that sustain and make life suitable for us.

We kindly request that the inspection panel investigate this matter and take appropriate action to ensure that the project complies with World Bank's policies and safeguards.

Thank you for your attention to this serious matter.

Sincerely,



SIGNATURES

[REDACTED]
New Bodija,
Ibadan.
3rd April, 2024.

The Project Coordinator,
Ibadan Urban Flood Management Project,
Agodi GRA
Ikolaba,
Ibadan.

DESTRUCTION OF OUR PROPERTY

With due respect, we are writing this letter to express our deep disappointment and frustration regarding the recent experience we had with your Agency. We wish to bring this matter to your attention with hope that it can be resolved promptly and prevent similar issues from recurring in the future.

On 21st February, 2024 the Contractor working at the back of our house blocked the stream channel where water used to flow to the save heaven and they were duly informed but they refused to open the blockage, they said that the rain would not fall, unfortunately, there was downpour in the following day which was 22nd February 2024 which wrecked various havocs on the residents living of the area. The flood destroyed our property and washed away some. We are humbly requesting the Contractor in charge of the project to repair and replace all our damaged property such as:

LAW FIRM

ASSOCIATES

Legal Practitioners

May 9, 2024

The Project Coordinator,
Ibadan Urban Flood Management Project, (IUFMP)
Agodi GRA,
Ikolaba,
Ibadan.



Dear Sir,

FINAL LETTER OF DEMAND FOR =N=1.09MILLION FOR DESTRUCTION OF PROPERTIES

We are counsel for [REDACTED] hereinafter referred to as "our client") and we write this letter on her behalf and instructions.

Our client is an established business woman and caterer resident at [REDACTED]

Our client has informed as follows –

1. That on February 21, 2024 your agents ([REDACTED] others) acting on your instructions while working at back of our client's house blocked the stream channel where water used to flow to the main stream.
2. That when they were challenged they refused to do anything about it and claimed that rain will not fall.
3. Unfortunately, there was heavy downpour of rain on February 22, 2024, and the consequential flood wrecked havoc on the house and properties of our client.

4. Some of the properties of our client destroyed and washed away and their values include : Medium Freezer (=N=80,000), Stabilizer Dura volt 2V-200 (=N=25,000), Rug carpet (=N=50,000), Chargeable fan (=N=13,500), Chairs Covers @=N=850 150 piece (=N=127,500), White Napkins @ =N=500 450 piece (=N=225,000), Skye blue @ =N=500 200 piece (=N=100,000), Gold at @ @ =N=500 350 piece , Wine @ =N=500 300 piece (=N=150,000) , White Tea Cup @ =N=18000 - 6 dozens (=N108,000) and Serviette paper pantex - 7 packs at @ =N=5000 (N35,000).
5. Our client lost properties valued at over =N=1,089, 000,000 as a result of the direct action of your staff or agent.

Consequently, I have our client's instructions to demand that you pay the sum of =N=1,089,000 (One Million, Eighty Nine Thousand Naira) only as damages for the cost of our client's properties.

Please take notice that failure on your part to comply within seven days of receipt of this letter will leave us no option but to take necessary legal actions against your establishment.

Thank you.

Yours faithfully,

[REDACTED]
Legal Practitioner



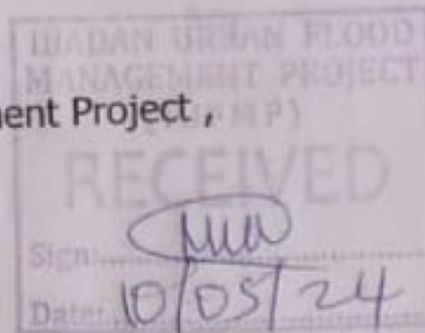
LAW FIRM

ASSOCIATES

Legal Practitioners

May 10, 2024

The Project Coordinator,
Ibadan Urban Flood Management Project, (MP)
Agodi GRA,
Ikolaba,
Ibadan.



Dear Sir,

LETTER OF DEMAND FOR ₦625,000 FOR DESTRUCTION OF PROPERTIES

We are counsel for [REDACTED] (hereinafter referred to as "our client") and we write this letter on his behalf and instructions.

Our client is an established businessman resident at [REDACTED]

Our client has informed as follows –

1. That on February 21, 2024 your agents acting on your instructions while working at back of our client's house blocked the stream channel where water used to flow to the main stream.
2. That when they were challenged they refused to do anything about it and claimed that rain will not fall.
3. Unfortunately, there was heavy downpour of rain on February 22, 2024, and the consequential flood wrecked havoc on the house and properties of our client.

4. Some of the properties of our client destroyed and washed away and their values include : Plasma Television (=N=150,000), Rug Carpet (=N=50,000), Home Theatre (=N=170,000), Stabilizer (=N=30,000), GoTV (=N=15,000), Refrigerator (=N=80,000), Children Cloth and shoes (=N=100,000) and Standing Fan (N30,000).
5. Our client lost properties valued at over =N=625,000 as a result of the direct action of your staff or agent.

Consequently, I have our client's instructions to demand that you pay the sum of =N=625,000 (Six Hundred and Twenty Five Thousand Naira only) as damages for the cost client's properties.

Please take notice that failure on your part to comply within seven days of receipt of this letter will leave us no option but to take necessary legal actions against your establishment.

Thank you.

Yours faithfully,

[Redacted Signature]

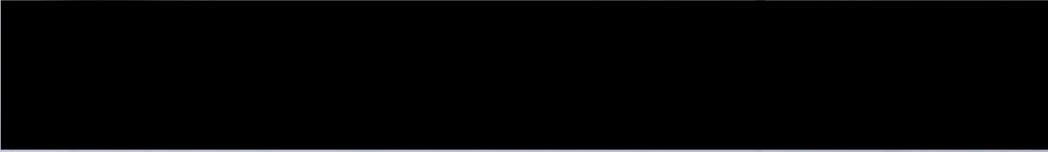
Legal Practitioner



LAW FIRM

ASSOCIATES

Legal Practitioners



May 9, 2024

The Project Coordinator,
Ibadan Urban Flood Management Project,
Agodi GRA,
Ikolaba,
Ibadan.



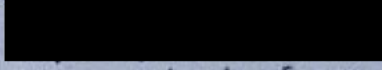
Dear Sir,

FINAL LETTER OF DEMAND FOR =N=1.8 MILLION FOR DESTRUCTION OF PROPERTIES

We are counsel for Ojukaye Bose Aisha (hereinafter referred to as "our client") and we write this letter on her behalf and instructions.

Our client is an established business woman and owner of New Dawn Nails and Hair Studio at 21 Solelbonel Street, Beside Salami Estate, New Bodija, Ibadan.

Our client has informed as follows –

1. That on February 21, 2024 your agents ( others) acting on your instructions while working at back of our client's house and shop blocked the stream channel where water used to flow to the main stream.
2. That when they were challenged they refused to do anything about it and claimed that rain will not fall.
3. Unfortunately, there was heavy downpour of rain on February 22, 2024, and the consequential flood wrecked havoc on the house, shop and properties of our client.

4. Some of the properties of our client destroyed and washed away and their values include : Goods (=N=476,000), Sliding door (=N=130,000), Dryer 2 (=N=160,000), LG TV - 38inches (=N=180,000), Pedicure bath (=N=38,000), Flatong 5 piece (=N=130,000), Hand dryer (=N=70,000), Generator 42KV (=N=280,000) , Chiller Refrigerator (=N=320,000) , and Hair Clipper (=N=35,000).
5. Our client lost properties valued at over '=N=1,810,000 as a result of the direct action of your agent(s).

Consequently, I have our client's instructions to demand that you pay the sum of =N=1,810,000 (One Million, Eight Hundred and Ten Thousand Naira only) as damages for the cost of our client's properties.

Please take notice that failure on your part to comply within seven days of receipt of this letter will leave us no option but to take necessary legal actions against your establishment.

Thank you.

Yours faithfully,

[REDACTED]
[REDACTED]
[REDACTED]
Legal Practitioner

