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Friday, April 26, 2024

**Engr. Dave Umahi**
The Honorable Minister
Federal Ministry of Works and Housing
Mabushi, Abuja.
Nigeria

Dear Honorable Minister,

**COMMENCEMENT OF DEMOLITION FOR THE LAGOS-CALABAR COASTAL ROAD**

At a press briefing yesterday, Thursday 25th April 2024, the Federal Ministry of Works announced that it will commence demolition of structures along the first 3 km of the revised right of way of the Lagos-Calabar Coastal Road tomorrow, Saturday 27 April 2024.

I would first like to put on record my support for development of a Coastal Road. I readily acknowledge the value that such a project can add Nationally and to Lagos State in particular, but only if it is properly conceived, planned and implemented.

As countless other ostensibly "transformational" projects in Nigeria and across developing countries have shown, lack of due process in execution is usually a fatal flaw. The apparent and hidden costs of this are borne by generations of citizens while disproportionate benefits from undertaking the project accrue to a few individuals.

Numerous concerns have been raised about cost and the lack of competitive bidding in the award of this contract that are yet to be remedied, and that need not be repeated here. A more relevant concern for the purpose of this letter is the fact that the environmental impact assessment for the Coastal Road project has not been completed or shared for public comments even though the project has commenced, and the hugely consequential step of demolition appears imminent. As you are well aware, no serious government should undertake such a large project without a standard EIA document, completed and published for discussion in the public domain. This is in fact a legal requirement for highway projects under Nigeria's EIA Act.

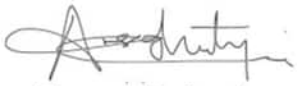
Alarmingly, I am aware that a preliminary scoping workshop for the Environmental Impact Assessment that is to be conducted for this project was held just last Saturday 20th April (see attached) at which matters relating to the scope and terms of reference for the EIA were only just being tabled for discussion preparatory to undertaking the EIA itself.

Lagosians, especially those of us with deep and abiding roots in the city, are keenly aware that Lagos is a densely populated, low-lying coastal city with well known flooding and coastal erosion risks that must be carefully managed. This road passes

through some of our naturally protective wetlands. These areas are also known to exhibit great biodiversity. The road traverses some of our indigenous communities that pursue their sources of livelihood on the coast. In light of these, failure to complete and publish a standard EIA in the public domain for comments and discussion before commencing is irresponsible and, in my opinion, a violation of the EIA Act.

In conclusion, the inordinate urgency with which this project is being pursued is quite curious. While reiterating my support for the development of a Coastal Road, I call on you to ensure that you fulfill your obligations of law and due process so that the promised benefits of this road to the citizenry are realized and are not far outweighed by poorly managed technical, financial, environmental and social costs. The project should not proceed further, nor should demolition be contemplated, until the basic governance safeguards are in place in accordance with good practice and in compliance with Nigerian law.

Thank You.



Funso Doherty.

Cc: His Excellency, Babajide Sanwoolu, Governor, Lagos State..
Distinguished Senator Godswill Akpabio, President of the Senate
Rt. Honorable Tajudeen Abbas; Speaker of the House of Representatives
Senate Committee on Public Procurement;
House Committee on Public Procurement.