

Swott Analysis of Environmental Impact Assessment System: A Case Study of Geregu Power Plant Phase II, Ajaokuta, Kogi State, Nigeria

Alonge J.A, Samaila I, and Mundi R.

Abstract: The study examined the strength, weaknesses, opportunities, threats and trends (SWOTT) of Environmental Impact Assessment system in Nigeria using Geregu Power Plant Phase II in Ajaokuta, Kogi state as case study. The study area population comprised of project’s host communities and other stake holders in the National EIA system. The purposive sampling method of data collection was used to select the samples. Five hundred (500) respondents contributed to the survey of which questionnaires were administered. The data collected was analysed using descriptive and inferential statistics for evaluation of respondents rating which includes, The Extent of National EIA System compliance, strengths and short comings of the National EIA System, Current practice of EIA System, Criteria influencing the national EIA System, Extent of improvement of national EIA System among others. Findings from the research indicate that the establishment of a regulatory Authority is one of the major strengths of the National EIA System. One of the major weaknesses of the national EIA system is the non-consideration of Strategic Environmental Assessment (SEA), while on the opportunities is the tiered assessment. Threats mainly observed are the unacceptability and the misunderstanding of the multi-discipline nature of EIA, while the best global practices in the EIA process management is one of the major trends. As a result of the findings, it was recommended that there is a need to improve on the EIA System strength maximally, prioritize turning of the weaknesses of national EIA system to world class ESIA practise and to promote EIA system by taking advantage of opportunities. Furthermore, government cannot avoid ignoring the weakness of the EIA system and threat or fail to improve on the strength of the EIA system or value opportunity that need to develop the system and increase capacity of the EIA system operators.

I. INTRODUCTION

It has been over a quarter of a century since Environmental Impact Assessment (EIA) was formally introduced in Nigeria in 1992 through EIA Act No 86 of 1992. Since then, the EIA practice in Nigeria has evolved and so has its conceptual understanding in particular through the ongoing reviews of enabling law. The paper reflects on National EIA System using an approved EIA report in the power sector with the affected stakeholders as case study to conduct strength, weakness, opportunity, threats, trends (SWOTT) analysis.

The Netherlands Commission for Environmental Assessment (NCEA 2014) defines an environmental impact assessment system as a coherent set of functions that are necessary for effective environmental impact assessment practice. Likewise, Canadian council of international cooperation (CCIC 1993)

define EIA as an activity which identifies, predicts, interprets, and communicates information and proposed ameliorative measures about impact of a proposed action or development proposal on human health and wellbeing of the ecosystem upon which human survival depends. The EIA system can be considered to be improved when one or more of its functions have been strengthened. NCEA 2014 have identified six functions of EIA system to include regulatory framework for EIA decision making, awareness and commitment for EIA including funding, EIA education and professional training, advice on EIA procedure and practice, monitoring implementation, EIA instrument, as well as professional exchange on EIA.

Since the enactment of EIA Act in Nigeria in 1992 to date, about 4,000 developmental activities across various sectors of the economy have been registered (Table 1). The EIA process flow chart is shown in Figure1. The regulation provides the proponent with an opportunity to assess the potential environmental impact of proposed development activities as well as provide for the identification of the mitigation measures to be in place to ensure that environmental impact is avoided, minimised or mitigated. Key to this process is the public participation element which form an integral part of EIA process. The effectiveness and efficiency has not been broadly evaluated on power sector, especially on site specific basis. Though, several studies have been carried out generally in evaluation of EIA system in Nigeria in the last few years, but according to Chris N (2013) little or no work has been done in the power sector. It is based on the above reality that a study to determine the SWOTT analysis of environmental impact system in Nigeria was done.

Table 1: Summary Of Eia Registration From 1994 To 2017

S/N	YEAR	TELECOM	OIL&GAS	AGRICUL TURE	MINING	INFRASTR UCTURE	MANUFAC TURING	WASTE MANAGE MENT	POWER	TOTAL
1	1994	0	2	0	0	1	0	0	0	3
2	1995	0	3	0	0	2	4	0	0	9
3	1996	0	12	0	0	0	1	0	0	13
4	1997	16	1	0	1	1	3	1	0	23
5	1998	0	36	1	0	3	1	3	1	45
6	1999	0	26	0	1	7	2	2	0	38
7	2000	0	50	0	3	11	4	2	2	72
8	2001	1	44	0	3	9	2	2	5	68
9	2002	0	33	1	2	12	0	1	3	52
10	2003	0	26	0	1	20	3	1	3	54
11	2004	1	55	0	0	11	10	1	7	85
12	2005	0	54	3	3	23	5	5	21	114
13	2006	5	70	3	4	26	13	3	5	127
14	2007	0	22	0	4	10	8	2	2	57
15	2008	0	49	3	5	28	10	5	9	109
16	2009	0	59	4	7	70	15	4	26	165
17	2010	59	57	10	82	23	82	12	8	280
18	2011	122	38	8	43	33	15	6	40	305
19	2012	54	55	6	70	106	10	4	33	336
20	2013	101	50	62	71	97	15	7	38	444
21	2014	71	46	17	121	71	21	9	42	398
22	2015	75	32	15	96	65	34	10	28	353
23	2016	80	33	6	197	114	24	3	44	371
24	2017	4	54	9	94	180	18	8	49	416
Total		240	887	154	661	991	210	77	383	3,934
%		1.9	22.3	3.9	16.8	25.2	5.8	1.9	9.7	

Source: Fmenv (Federal ministry of Environment Abuja Nigeria) (2019). Compiled data from National EIA Registry

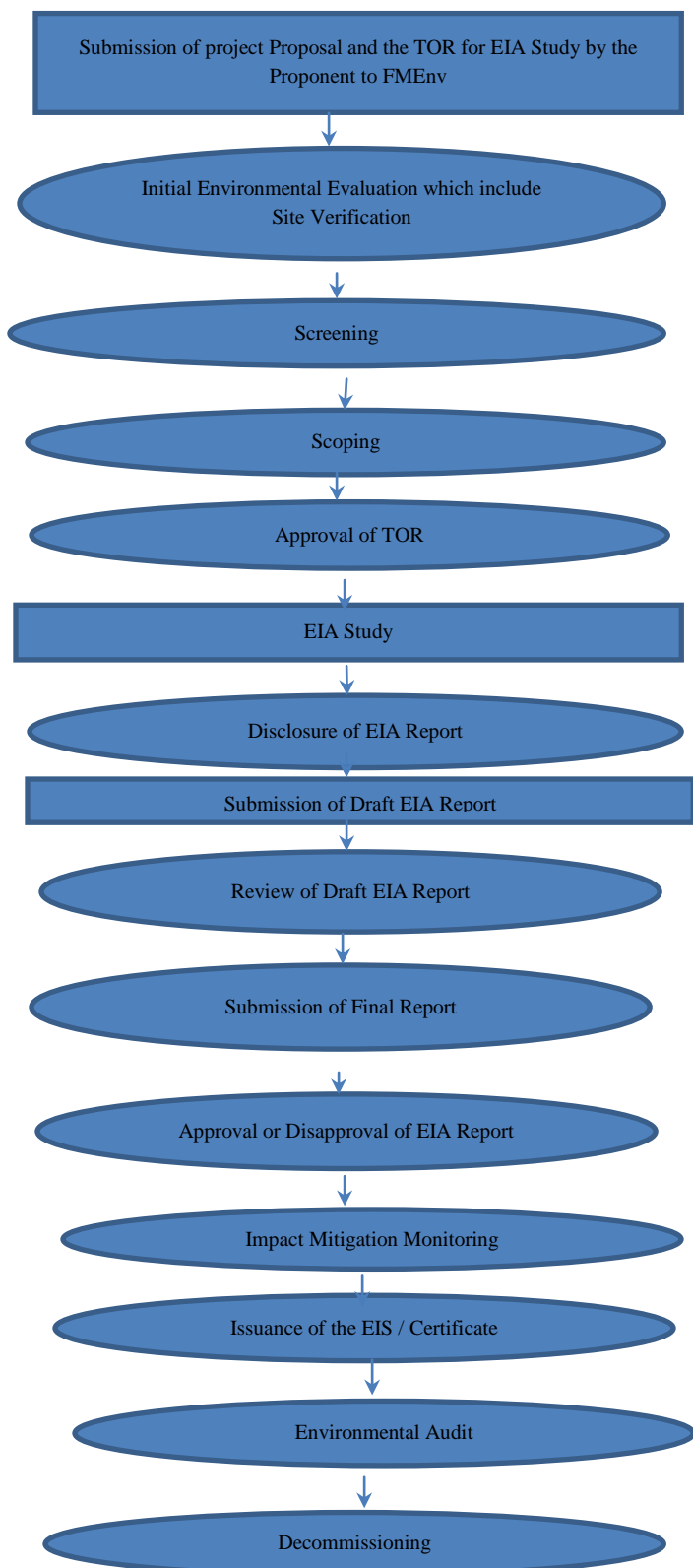


Figure 1: EIA Process Flowchart

Source: Fmenv (Federal Ministry of Environment Abuja Nigeria) 2018. Environmental Impact Assessment Procedural Guideline

SWOTT stands for strength, weakness, opportunities and trends and its analysis is a technique for assessing five aspects of EIA system for proposed developmental activities. Strength and weakness represent internal environment (What happened within the EIA system), while opportunities, threats and trends represent external environment (what happens around EIA system). The essence of SWOTT Analysis include the following:

- i. EIA effectiveness towards a better system, optimal productivity can be used to initiate effective principles for growth
- ii. Making the best out of the EIA system and reduce the chances of failure by understanding the system and eliminating hazards that would otherwise hinder EIA process.
- iii. Provision of a better picture of all opportunities and challenges by allowing positive changes which lead to new opportunities.
- iv. Enables a thorough examination/exact definition of EIA system.
- v. It affords the opportunity of handling threat and weakness.
- vi. It helps to build on/improve successes to address necessary gaps to minimise risk and to take the greatest positive advantage of chances of success.
- vii. It can be used to get understanding and give insight of facilities/process.

II. METHODOLOGY

Environmental impact assessment system survey was conducted with the aid of a set of questionnaires on an approved environmental impact assessment report by the competent EIA system authority in Nigeria.

The questionnaire was administered on stakeholders of ongoing project approved by the competent authority/that is a developmental activities subjected to the provisions of EIA law of Nigeria, being operated by Federal Ministry of Environment. The EIA survey was conducted during rainy season in 2020. It was designed to explore effectiveness as perceived by EIA stakeholders and consisted of several parts relating to the background of participant, their perception of EIA System in Nigeria and what they thought are the attributes of an ideal EIA system. The part of the survey established professional details as well as experience of the respondent. This helped the subsequent interpretation and discussion of results and develops understanding of expected value. The questionnaire was structured to allow participant to comment on all issues. In total, 500 respondents contributed to the survey of which questionnaire was administered on various EIA stakeholders- IAIA members in Nigeria, key Ministries and their agencies, Federal Ministry of Environment saddled with responsibility of EIA, Environment Ministry at the affected state and local government authority (three tiers of government responsible for environment), EIA consultant, university lecturers/research Institutions, NGO/CBO, project's host communities as well as

environmental regulators among others. Areas of the questionnaire relevant to this article/research include strength and weaknesses of EIA process in Nigeria, performance of EIA system in Nigeria against international best practice, evaluation criteria for EIA system in Nigeria, characteristics of EIA system in Nigeria among others. Data was collected from both primary and secondary sources [Fmenv 2004 and Fmenv 2019] and analyzed with displayed results in tables.

III. FINDINGS AND DISCUSSION

3.1. Criteria for evaluating SWOTT Analysis

The SWOTT analysis conducted involved questionnaire administration for 500 respondents and the notes on the tabular analysis are A-G below:

- a. Evaluation criteria with 15 items were considered for respondent rating.
- b. Extent of National EIA system compliance with a set of 30 criteria considered for respondent rating. The respondents rating was on thirty criteria on extent of compliance of National EIA System with thirty criteria with the use of Likert scale analysis. From the average mean value of 3.01 gotten which is greater than 2.45. It can be deducted that to a large extent the National EIA system comply with the following issues, EIA Administration. Public participation, EIA legislation, specified screening among others. The National EIA system didn't cover formal provision for SEA. Cumulative impact, public appeal against decision among others.
- c. Strengths and short coming of National EIA System (18 Criteria)
Strengths and shortcoming of National EIA system: The respondent rating on short coming of National EIA system has a positive result from analysis carried out. The multiple R has a value of 1 which represents a correlation relationship between variables. The alpha which is 0.05 value is greater than the F significance 2.09 E-247 confirming evidence of positive relationship between challenges of EIA system and Geregu power plant operation. Eighteen areas of weakness /shortcoming/ were considered for respondent rating.
- d. Current practice of National EIA system with a set of 13 criteria were considered for respondent rating: Current practice of EIA system with a set of 13 criteria with the use of likert scale the average mean value of 3.07 which is to say the criteria are very satisfactory for issues of strengths, weakness, opportunities, threat and trends of EIA system.
- e. Criteria influencing the National EIA system with eleven criteria: Eleven (11) criteria influencing the National EIA system were considered. The respondent rating analysed with likert scale present an average value of 3.95 which confirm areas of strength, opportunity, threat and trend of EIA system.

- f. Extent of improvement of National EIA system: Eleven criteria were considered. Extent of improvement of criteria because of National EIA system. The respondent rating of the extent of improvement of criteria as result of National EIA system analysed with Likert scale present a mean average value of 2.94, which implies that criteria on National EIA system have strengths, weakness opportunities, threat, trends.
- g. Perception criteria undertaken for a satisfactory baseline: 16 criteria were considered for respondent rating.

Summary of issues from respondent ratings from A-G above are on Table 2. This table present the classification of issue from respondent rating in terms of strength (S), weakness (W) opportunities (O), threat (T) and trend (T).

Table 2. Classification of Issues from Respondent Ratings

Rating Criteria	S	W	O	T	T
Clear legal basis for EIA system /enabling legislation	✓	0	0	0	0
No consideration of SEA	0	✓	0	0	0
Regulatory Authority	✓	0	0	0	0
Relies on technical input	0	✓	0	0	0
Improves public relations	✓	0	0	0	0
Lack of cost benefit analysis	0	✓	0	0	0
Boost Efficiency of project	✓	0	0	0	0
Consideration of heritage	0	0	0	0	✓
SEA analysis	0	0	✓	0	0
Climate change explicitly addressed	0	0	✓	0	0
Ensure developmental activities subjected to EIA	0	0	0	0	✓
Regulatory Authority	✓	0	0	0	0
Widening scope	0	0	✓	0	0
Procedural guideline and specification of time line	✓	0	0	0	0
Proposed amended of EIA Act	0	0	0	✓	0
Legitimation of sound projects	0	0	0	0	✓
Perceive threat from competence	0	0	0	✓	0
Procedure post project monitoring and follow up	✓	0	0	0	0
Fast tracking /reutilization lost reduction	0	0	0	✓	0
In effective and regular communication	0	0	0	✓	0
Commitment to presence and protect environment	0	0	0	0	✓
Ecological heats of sea	0	0	0	0	✓
EIA and habitats regulation assessment	0	0	0	0	✓
Evaluation /Assessment of police plans & program	0	0	0	0	✓
Relies on technical input	0	✓	0	0	0
Use of cumulative impact	0	0	0	0	✓

Encompassing trace boundary effects	0	0	0	0	✓
Versatile application range	✓	0	0	0	0
Developing methodologies to ensure transparency in the process	0	0	0	0	✓
Application to macro-economic initiatives	0	0	0	0	✓
Misunderstanding of EIA system	0	✓	0	0	0
Weak evaluation of alternative	0	✓	0	0	0
Versatile application range	✓	0	0	0	0
NGO is passive	0	✓	0	0	0
Broader scope of EIA application	✓	0	0	0	0
Provision for expansion of new Project and renovation of old one	✓	0	0	0	0
Explicit provision of public participation	✓	0	0	0	0
Weak coordination between agencies at National & local	0	✓	0	0	0
Strengthening of human health in EIA practices	0	0	0	0	✓
Clear timeline for EIA Process	✓	0	0	0	0
Specification of sectorial authority responsibility	0	✓	0	0	0
Improved knowledge of EIA stakeholders	0	0	0	0	✓
Weak EIA with development assistance /international trades	0	✓	0	0	0
Deeding and implementing regulating mechanics	0	0	0	0	✓
Environmental Auditing Tech and life cycle Assessment	0	0	0	0	✓
Small projects to be included in cumulative impact	0	0	0	0	✓
Application to trade arrangement and agreement	0	0	0	0	✓
Stakeholder investment in global trends	0	0	0	0	✓
Encouraging social commitment and ownership	0	0	0	0	✓
Unacceptable and misunderstanding of the multi discipline nature of EIA	0	0	0	✓	0
Government, business, industry, academic, institution, NGO working for cause of environmental protection	0	0	0	0	✓
Methods used for impact prediction not unique to EIA process	0	0	0	✓	0
In ability of EIA practitioner to comprehend the legal and procedural and functional complexities of the EIA situation	0	0	0	✓	0
Broader definition of Environment	✓	0	0	0	0
Weak evaluation of alternatives	0	✓	0	0	0
Application to trade arrangement and agreement	0	0	0	0	✓
Identification of probable impact target	0	0	✓	0	0

Cost benefit analysis	0	0	✓	0	0
Clear list of project for screening	✓	0	0	0	0
Asses impact in ecosystem and sensitive target withdrawal of unsound project	0	0	0	0	✓
Development of management strategies of impact	0	0	0	0	✓
Absence of cumulative EIA provisions in law	0	✓	0	0	0
Development and environment protection are no longer contradictory or monitoring post impact evaluation of impact, mitigation procedures and cumulative effect	0	0	0	0	✓
EIA does not ensure environmentally sound projects	0	0	0	✓	0
More emphasis an monitoring post impact evaluation of impacts, mitigation procedures and cumulative effect	0	0	0	0	✓
Weak public participation	0	✓	0	0	0
More proactive remedial management action	0	0	0	✓	0
Absence of effective quality control of EIA process	0	✓	0	0	0
Continue the networking function	0	0	0	✓	0
Procedures for dealing with trans boundary issue	0	0	0	0	✓
More practice remedial management action	0	0	✓	0	0
Better implement of local communities and communal knowledge	0	0	✓	0	0
Absence of independent institutional set up to conduct, monitors & Emp implementation	0	✓	0	0	0
Better documentation and report of findings	0	0	✓	0	0
Proposed mitigation measures may not be implemented	0	0	✓	0	0
The application of more reforms but predicable methods and techniques	0	0	✓	0	0
Lack of risk assessment	0	✓	0	0	0
Use of IT (GIS, expert, away others)	0	0	✓	0	0
Poor integration of biophysical environmental impacts with social, economic and health effects	0	0	✓	0	0
Difficulties in ensuring adequate and useful public involvement & participation	0	✓	0	0	0
Inadequate practitioner capacity by some tier of government	0	✓	0	0	0
Lack of cost analysis	0	✓	0	0	0
High level political commitment / functional support	0	0	0	0	✓
Administrative arrangement and cross sectorial awareness	0	0	0	0	✓
EIA and international environment problems	0	0	0	0	✓

EIA and global commons / loss of biodiversity	0	0	0	0	✓
Climate change, depletion of ozone layer	0	0	0	0	✓
EIA and international trade /development assistance	0	0	0	0	✓
Weak enforcement of laws and regulations	0	✓	0	0	0
Low levels of awareness of importance of environmental management and sustainable development	0	✓	0	0	0
Fast learning curve	✓	0	0	0	0
Explicit provision for all stages EIA	✓	0	0	0	0
EIA approval conditions	✓	0	0	0	0
Constitutional support for environmental protection	✓	0	0	0	0
Continuing perceived bias: inequality in process	0	0	0	✓	0
Inadequate screening and scoping	0	✓	0	0	0
Tiered assessment	0	0	✓	0	0
Linkage between EIA and achieving sustainable development	0	0	0	0	✓
Improved formal consultant, and public	0	0	0	0	✓
EIA implementation and court case by NGO	0	0	0	0	✓
EIA is not often integrated into planning	0	✓	0	0	0

3.2: Strength, Weaknesses, Opportunities, Threats and Trends of EIA System in Nigeria

i. Strength

From Table 2, the following strengths of EIA system in Nigeria are obvious:

- Clear legal basis for EIA system/ enabling legislation
- Constitutional support for environmental protection.
- Broader definition of environment
- Clear list of projects for screening
- Clear timeline for EIA process and procedural guideline
- EIA approval conditions
- Coordination of all EIA regulators at all tiers of government
- Fast learning curve
- Specified EIA report content
- Explicit provision is made for undertaking all stages of EIA- Screening, scoping etc.
- Explicit provision for public participation.
- Provision for expansion of new project and upgrading of old project
- The broader scope of EIA application
- Boost efficiency of project
- Regulatory authority/competent authority
- Post project monitoring and follow up
- Legitimation of fund project

- Review body for EIA/Systematic EIA review approach
- Post project monitoring and follow up
- Systematic decision making approach
- coverage
- Versatile application range

ii. Weaknesses

- Poor integration of biophysical environmental impacts with social, economic and health effects.
- Occasionally EIA process is undertaken too late and proponent are primarily concerned with administrative requirement.
- Difficulties in ensuring adequate and useful public involvement and participation.
- No consideration for SEA/ Absence of formal provision for SEA
- Lack of cost benefit analysis
- EIA requirement of the three tiers of government are seldom considered
- Costly time delays.
- Weak coordination between agencies at national levels and between national and local levels.
- Problems with global common, climate change, ozone depletion, loss of biological.
- Weak evaluation of alternatives
- Weak public participation
- Inadequate practitioner capacity by some tier of government
- Inadequate competent intermediary (NGO)/ Passive NGO's
- Weak enforcement of laws and regulations (consultant etc)
- Lack of formal specification of sectoral authority's responsibilities
- Lack of risk assessment
- Inadequate screening and scoping
- Absence of independent institutional set up to conduct and monitor EIA and EMP implementation.
- Weak EIA system with development assistance/agencies international trade
- Absence of cumulative EIA provisions in the law.
- Absence of effective quality control of EIA process.
- Tricky issue of EIA is the decision on minimum acceptable impact.
- Evaluation of living systems is impossible in monetary terms and hence the cost benefit analysis of EIA often appears unrealistic for many.

iii. Opportunities

- More project /developmental activities EIA
- More stages of project lifecycle
- Widening scope-SIA, HIV, etc.
- Tiered assessment- SEA etc.
- Use of IT (GIS, expert system, among others)
- Amendment of EIA act.

- The application of more reforms but practicable methods and techniques.
- Better documentation and reporting of findings to enhance learning from experience from one project to the next and from one proponent to another.
- Better involvement of local communities and communal knowledge.
- More proactive remedial management action that blends into regular modes of operation.
- Continuous networking.
- More emphasis on monitoring post-impact evaluation of impacts and mitigation procedures and cumulative effects, as well as how to weigh the significance different entail, social and economic effects in decision making.
- Development and the environmental protection both to go hand in hand for sustainable future and development
- Identification/prediction of impact of activity of environment
- Evaluation of alternatives
- Identification of probable impact targets
- Assess impact on ecosystem and sensitive targets.
- Cost benefit analysis
- Development of management strategies to minimise impacts.
- Appeal by proponent or the public against decisions
- Training and capacity building
- Nigerian Federal Government reviewing the EIA act, developing and implementing regulatory mechanism.
- Knowledge of all EIA stakeholders and capacity to deal with environmental issues having being improved rapidly in last decade.
- Provision for international donor and multilateral agency or development agency
- Evaluation/assessment of policy plans and programme.
- Use of cumulative impact assessment
- Encompassing procedures for dealing with trans boundary effects, assessing the impact of trade policies, budget structures adjustment programme, national plans, and projects of a regional nature.
- Developing methodologies to ensure transparency in the process and involve public participation.
- Focus on major development projects and application to national, sectoral and regional development plans.
- Application to macro-economic initiatives such as structural adjustment/ budgetary/taxation initiatives.
- Application to trade arrangements and agreements
- Small-scale projects to be included in most EIA systems as their cumulative impacts may be significant overtime.
- Environmental auditing technology assessment and lifecycle assessment.
- Improved public and formal consultants
- Linkages between EIA and achieving sustainable development
- High-level political commitment/financial support
- Administrative arrangement and cross sectoral awareness
- Operational centre of EIA expertise training, research, consultancy, databases.
- Stakeholder involvement is in accordance with global trends in democratization and increasing accountability.
- Encouraging social commitment and ownership as well as leading to better project identification, preparation, and implementation.

iv. Threats

- Overlapping and duplication of functions by MDA (Ministries/Departments/Agencies)
- Misunderstanding of purpose and limitations of EIA practices by EIA practitioner, as well as, EIA understudy and accept the multidisciplinary nature of EIA and inability to keep and expand communication with approved institutions.
- Perceived threat from competence procedures.
- Continuing perceived bias; inequality of process.
- Fast-tracking/routinisation/cost reduction
- Inability of EIA practitioner to comprehend the legal and procedural requirements, as well as functional complexities of the situation in which EIA is being conducted.
- Discrepancy in knowledge of EIA system.
- Lack of simplification of complex issues in EIA
- Misunderstanding of multidisciplinary of EIA nature
- Lack effective and regular communication
- Impact monitoring of specific projects can be difficult due to cumulative impacts from multiple projects.

v. Trends

- Commitment to preserve and protect environment
- Governments, business, industry, academia, institutions and NGO`s are working and cooperating for the cause of environmental protection

IV. RECOMMENDATIONS

Based on the findings, the following recommendations were made:

- a. There should be improvement on EIA system strengths and efforts to use them maximally. It is a winning formula that should not be changed.
- b. ii. Work on the weakness of national EIA system and tap experience of world class ESIA practice/international best practices. There will be need for more knowledge/capability building.
- c. iii. Opportunities are generally external relating to surround of EIA system – membership of IAIA and participation by regulatory authority. These opportunities should be taken as an advantage to promote EIA system.

- d. iv. Internet, social media, financial/budgetary provision, new technology can assist – ICT, Social, Electronic. Network strategies contact to other good advise
- e. v. Advantage of institution, IAIA / regulatory need to appreciate identified opportunity, invest in them, create good relationship, make good use of opportunities.
- f. vi. On Threat, these includes anything that can negatively affect EIA system from the external/outside such as: issues raised against the EIA process by NGO, identified hindrances EIA currently faces in the country, overlapping/duplication of functions among others. Government should guide against weakness that can lead to threat and likewise come up with strategies that can upscale weakness to strength.
- g. New challenges: EIA and international environmental problems. Problems concerning the global commons/loss of biological diversity global warming, the use of EIA by development assistance organisation and the potential for EIA to inform decisions on international trade agreements, problem associated with EIA and development assistance/agency, problem associated the EIA and international trade, other Shortcoming- systemic problem, problem associated with foreign aid-USAID, bilateral and multilateral aid agencies, World Bank, JICA among other

V. CONCLUSION

Nigeria Environmental Impact Assessment (EIA) Act was enacted in 1992. It relied on the institutional framework that has a strong supporting legislative, administrative and procedural set up. Both local, state, and federal authorities together are sharing the responsibility of its development and management. Development is an ever growing process and its impact is often detrimental to environment which in turn may lead to adverse consequences for human life. EIA is an anticipatory and participatory environment management tool which helps in decision making process for different upcoming development projects by analysing the environmental consequences of actions. A strength, weakness, opportunity and threat, as well as trends (SWOTT) analysis

taken up in this article has suggested that there are several issues that need to be readdress. It highlights several constraints, ranging from improper screening and scoping guidelines to the effective monitoring and post project evaluation. The opportunities are realised as increasing public awareness, initiatives of environmental groups and business community are forward thinking to integrate environmental consideration into plans and policies likewise. Poor governance, rapid economic reforms and small-scale units are some of the foreseen threats to the system.

It has recognised that Nigeria is well versed with apt legal provisions which are very essential for further strengthening of EIA process. Moreover, EIA process possess a basic structure, including screening, scoping, comprehensive study, progress report, review, public participation decision and follow up measures.

To address the critical issues political commitment and public participation is indispensable. Improved effectiveness will also depend on strength of the National competent authority, which is federal ministry of environment in Nigeria.

Finally, government cannot avoid ignoring the weakness of EIA system and threat or fail to improve on the strength of EIA system or value opportunity that needs to develop the system & increase capacity of the EIA system operators.

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