

**GOMBE STATE OF NIGERIA**  
**GOMBE STATE INVESTMENT PROMOTION**  
**AGENCY (GOSIPA)**



**INVESTMENT APPROVAL PROCESS**  
**(IAP)**

## **Purpose and Objective**

This document outlines the Investment Approval Process for large-scale agricultural investments in Gombe State, as guided by the principles of the Framework for Responsible and Inclusive Land-Intensive Agriculture (FRILIA). Its primary aim is to provide a structured and transparent pathway for evaluating, approving, and implementing agricultural investments that involve significant land use. The process has been developed to ensure that such investments are carried out in a manner that is inclusive, accountable, environmentally responsible, and socially beneficial, particularly to local communities and vulnerable groups. By following this step-by-step process, Gombe State government agencies, investors, and stakeholders can engage in land-based investments with greater clarity, mutual trust, and regulatory compliance. Ultimately, the goal is to enhance investor confidence, protect community rights, and support sustainable agricultural growth in the state, while ensuring alignment with the SABER program and FRILIA toolkits.

## **Legal and Regulatory Framework**

This Investment Approval Process (IAP) is guided by Gombe State laws and policies governing land administration, agricultural investment, environmental protection, and the FRILIA Executive Order No. 13 of 2023.

**Scope:** This policy applies to all MDAs involved in the approval, regulation, or implementation of large-scale agricultural investments, particularly those related to land acquisition, environmental compliance, and community engagement. Key agencies include the Gombe Geographic Information Systems (GOGIS), Gombe Investment Promotion Agency (GOSIPA), Ministry of Agriculture, Ministry of Environment, Ministry of Justice, the Fadama Development Association, World Farmers Organization, and the International Food and Agriculture Organization.

**Lead Implementing Agency:** Gombe State Investment Promotion Agency (GOSIPA)

**Supporting Agencies:** Gombe State Geographic Information Systems (GOGIS), Gombe State Ministry of Agriculture, Gombe State Ministry of Environment, Ministry for Local Governments and Emirate Affairs, Ministry of Finance, Gombe State Judiciary.

### Investment Approval Process: Step-by-Step

Stage	Steps/Process	Investor's Responsibility	State Government's Responsibility	Time frame
1	<b>Step 1: Know Your Customer (Due Diligence) Assessments.</b>	<p><b>All large-scale agricultural investments should enter exclusively through Gombe State Investment Promotion Agency (GOSIPA).</b></p> <p>Investors approach the state government.</p>	<p>a. GOSIPA identifies potential investments and communicates the FRILIA Toolkit.</p> <p>b. GOSIPA to conduct a due diligence search on the investor and provide the investor with the IAP (Investment Approval Process).</p> <p>c. Possible initial engagement with the community if the area has been preliminarily identified (Potential location check/site seeing). (Eg. Stakeholder Mapping, Draft State Investor MoU, Screening matrix completed to flag potential risks,</p>	14 working days
2	<b>Step 2: Information Exchange and Site Visit.</b>		<p>a. GOSIPA to provide information and resources that the potential investor may need for more clarity about the State investment policy. Also coordinates the investor's interaction with other government agencies (e.g Ministries of Agriculture, Ministry of Local Government Affairs, and Stakeholders identified) and helps the investor locate service providers—for example, site screening and environmental</p>	21 working days

			<p>data collection.</p> <p>b. GOSIPA arranges site visits for the investor after notifying local officials and communities of investor interest. For example, Community briefings, consultation planning.</p> <p>c. GOGIS notifies local government officials, other wards and community stakeholders to engage in internal consultations and then to respond preliminarily whether they might welcome the investment.</p> <p><b>ESRM Toolkit:</b> Site screening and environmental data collection</p> <p><b>GRM Toolkit:</b> Draft grievance forms shared with communities.</p>	
<b>3 a.</b>	<b>Step 3: Potential Investor Proceeds or Withdraws.</b>	a. The investor reacts to the community's initial response to the potential investment and the investor's assessment of the viability of the investment and the potential site. If the investor decides to withdraw, the process stops. If the investor wishes to consider a different location within the		21 working days
<b>b.</b>				

		<p>State, the process reverts to Stage 2. The process also ends if the community decides not to proceed.</p> <p><b>(CNA Toolkit:</b> Begins household interviews and asset mapping,</p> <p><b>Land Access, Easement and Involuntary Resettlement Management Toolkit:</b> Resettlement Action Plan (RAP).</p> <p>b. If the potential investor decides to proceed and the community is supportive, the investor should engage further, build relationships with the community and get them fully involved. The investor and the community (with legal assistance provided by the State Ministry of Justice and Community Legal Council should begin to discuss a community engagement plan to guide</p>		
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		<p>the ongoing consultations.</p> <p><b>Stakeholder Engagement Toolkit:</b> Update engagement plan with community input.</p> <p><b>GRM Toolkit:</b> Draft committee structures shared for approval.</p> <p><b>Community Needs Assessment Toolkit:</b> Design a Community Engagement Plan.</p>		
4. a	<b>Step 4: Investor Enters into a Memorandum of Understanding (“MoU”) with State Government IPA and Representatives of the Affected Communities.</b>		<p>a. GOSIPA to do more in-depth due diligence on the investor, and GOSIPA shares additional due diligence findings with other stakeholders (Technical Committee).</p> <p>b. Consultations with the community continue, and a community engagement plan may be agreed to at this point. GOSIPA to coordinate a round table Stakeholders meeting involving the Investor, IPA, representatives of the communities, NGOs, Farmers Union, AFE “Affected entities”).</p> <p><b>CNA Toolkit:</b> Final CDPs with budgets and timelines.</p>	21 working days
b.				

			<p><b>Stakeholder Toolkit:</b> FPIC documentation and sign-off.</p> <p><b>GMoU Toolkit:</b> Templates for land terms, local benefits (Local Employment MoU).</p> <p><b>CNA Toolkit:</b> Needs ranking and draft Community Development Plan (CDP).</p> <p><b>Outgrower Toolkit:</b> Initial model design and selection criteria.</p> <p>c. If all parties continue to be supportive of the proposed investment, they can attempt to agree on a MoU that covers the framework of the investment, how much land is required, benefits that may accrue to the community, commitments to ongoing consultation, preparation of an ESIA, etc. The MoU does not legally commit any party to a final agreement on the proposed investment.</p>	

5	<b>Step 5:Investor Completes and Shares a Feasibility Study , Business Plan and an independent Environmental and Social Impact Assessment (ESIA).</b>		<p>a. GOSIPA makes its determination whether the ESIA submitted is acceptable and notifies the investor within fourteen (14) days of receiving it.</p> <p><b>(ESRM Toolkit:</b> ESIA report + mitigation plan (ESMP)).</p> <p>b. If not already completed, a community engagement plan should be finished in this stage.</p> <p><b>CNA Toolkit:</b> Final CDPs with budgets and timelines.</p> <p>c. Land lease discussions can continue (if begun in a previous stage) or begin. Leases should not be finalised and signed until Stage 6.</p> <p><b>GMoU Toolkit:</b> Templates for land terms, local benefits (Local Employment MoU).</p>	21 working days
6	<b>Step 6: The Parties enter into Final Agreement.</b>		Gombe State Investment Promotion Agency (GOSIPA), Ministry of Agriculture, Ministry of Justice, Community Leaders, Investors and Stakeholders, see to the final agreement. The final agreement is likely to be contained in several individual agreements or could be combined into one document. While the precise requirements will vary, approved investment is likely to include some or all of the following:	31 working days



			<ol style="list-style-type: none"> <li>1. Land lease agreement</li> <li>2. Outgrower contract(s)</li> <li>3. Community impact and benefit agreement</li> <li>4. Community engagement plan</li> <li>5. Monitoring plan</li> <li>6. Inclusive, accessible and equitable dispute resolution mechanisms</li> </ol>	
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The six stages provide an overarching framework that guides all the toolkits of FRILIA. However, the unpacking of these stages varies from one toolkit to another. Hence, each of the FRILIA toolkits has its approach embedded within the overall investment project cycle.

## **Roles and Responsibilities**

The implementation of this Investment Approval Process (IAP) relies on the coordinated efforts of relevant government agencies, with a primary focus on the sub-units of the Gombe State Investment Promotion Agency. These sub-units are responsible for investor onboarding, due diligence, stakeholder coordination, documentation, and tracking of project progress through the IAP stages. Other MDAs, such as the Geographic Information Systems, the Ministry of Agriculture, Ministry of Environment, will support sector-specific processes in line with their respective mandates.

## **Feedback and Grievance Redress**

Investors, community members, and stakeholders are encouraged to report any issues, delays, or concerns encountered during the investment process. A formal grievance mechanism will be established and managed by GOSIPA, allowing complaints to be submitted via any of these channels: Gombe State Investment Promotion Agency Office located at Investment House opposite Dautu Governor's Office, Bauchi Road, Gombe, Gombe State | [info@gombeipa.org](mailto:info@gombeipa.org) or [www.gombegrm.com](http://www.gombegrm.com). All grievances will be acknowledged and addressed within 15 days to ensure transparency, fairness, and timely resolution.

## **Review and Update**

This IAP document will be reviewed and updated annually to reflect evolving policies, stakeholder feedback, and lessons learned from implementation. GOSIPA, in collaboration with GOGIS and the State Ministry of Agriculture, will lead the review process, in consultation with key stakeholders, to ensure continued relevance, effectiveness, and alignment with national and global best practices.