

Norwegian Refugee Council and Action Against Hunger Submission to the Foreign Affairs Committee's Inquiry into Implementing the Integrated Review in Nigeria (IRN0035)

18 June 2021

1. Introduction

1.1. This submission is made jointly by the Norwegian Refugee Council (NRC) and Action Against Hunger (AAH), two of the largest emergency relief agencies operating in Nigeria. NRC and AAH provide humanitarian assistance to populations affected by violence and displacement in the north-east of the country, including water and sanitation services; food, nutrition and cash assistance, support to health facilities, and the management of displacement sites. Funding from the Foreign, Commonwealth and Development Office (FCDO) has supported this work, including resourcing more than 100 health facilities in a partnership with AAH. Together, humanitarian aid provided by NRC and AAH and our partners has supported several million displaced and other conflict-affected people living in north-east Nigeria in recent years.

1.2. In this submission, NRC and AAH will address the following area of the Foreign Affairs Committee's inquiry: *What will the vision outlined in the Review and subsequent Foreign Commonwealth and Development Office priorities for Official Development Assistance spending mean for the UK's policy toward Nigeria?* It will focus on the humanitarian situation in north-east Nigeria where access constraints, violence against civilians and aid workers and acute food insecurity are having a devastating impact on people, with wide-ranging regional security, economic, political and humanitarian implications. While this document concentrates on the north-east, AAH and NRC would like to stress that the situation in north-west Nigeria needs to be closely monitored due to an increase in violence and displacements.

1.3. The Integrated Review reaffirms that; '[t]he UK will continue to champion International Humanitarian Law and humanitarian access, and provide principled humanitarian assistance at moments of crisis.' It commits the UK to; 'work to reduce the frequency and intensity of conflict and instability, to alleviate suffering and to minimise the opportunities for state and non-state actors to undermine international security'. The Integrate Review further asserts that the UK; 'will be active in Africa, in particular ... with important partners such as Nigeria' and recognises Nigeria as a 'regional power with global reach'.

1.4. The Integrated Review highlights the 'closely interconnected nature of our world'. Reflecting this, the impact of fragility and violence in north-east Nigeria is being felt across the region. In 2020, violence by non-state armed group in Nigeria, Cameroon, Chad and Niger increased by 60 percent.ⁱ NRC and AAH believe that Nigeria is an important testcase for the implementation of the Integrated Review, including realising the full potential of greater integration across government in support of the humanitarian response and conflict-reduction in north-east Nigeria.

1.5. Summary

1.6. The humanitarian situation in north-east Nigeria, particularly in Borno, Adamawa and Yobe (BAY) states, has been worsening for several years. 8.7 million people are now in need of humanitarian assistance, of which 1.92 million people are internally displaced.ⁱⁱ The nature of the ongoing conflict, including security risks and administrative impediments to delivering principled humanitarian assistance, means that 3.2 million people live in inaccessible or only partially accessible areas,

particularly in Borno State where 2.6 million people are largely or completely inaccessible to aid agencies.ⁱⁱⁱ

- 1.7. Food insecurity in the region doubled between 2019-2020, affecting now at least 9.2 million people and projected to worsen during the 2021 lean season. More than a million children have acute malnutrition. Worsening acute food insecurity is in large part a direct consequence of the protracted conflict and of restricted access of civilian populations to agricultural land and markets. The lack of access to livelihoods support and basic healthcare, including nutrition services, severely compounds the problem. This is in part due to shortfalls in humanitarian aid funding and the huge access difficulties that humanitarian actors face.
- 1.8. In the Integrated Review the UK re-commits to championing humanitarian access and principled humanitarian assistance. This is critically important in north-east Nigeria where the civilian population and aid agencies face some of the most difficult and dangerous humanitarian access challenges anywhere in the world. These include persistent threats and attacks against aid agencies, such as those experienced by NRC and AAH in mid-April 2021, when non-state armed groups targeted NGO offices, medical facilities, and aid workers in Damasak town. Alongside the overall security situation, one of the main barriers to reaching vulnerable families who live outside of major urban centres, especially in areas where non-state armed groups (NSAGs) are most active, is that the authorities have not allowed any engagement with NSAGs aimed at achieving principled humanitarian access to civilians in need of assistance, in line with IHL. This is one reason why there are at least 2.3 million people in the region who cannot access humanitarian assistance.^{iv}

1.9. Recommendations

- 1.10. UK foreign policy tools should be leveraged to maintain principled aid operations in north-east Nigeria and promote respect for international law by all parties to the conflict. The UK should step up humanitarian diplomacy and dialogue with the Nigerian authorities at the federal and state levels to find pathways to facilitating humanitarian access to people in need, including as part of efforts to prevent famine.
- 1.11. Building on the UK's partnership with the Nigerian military, the UK should advocate for strengthened civilian-military coordination between Nigerian armed forces and aid agencies, as part of efforts to promote respect for humanitarian principles and international law. This should be reflected in the UK's military engagement in the region.
- 1.12. In line with the UK's leadership on the implementation of UN Security Council Resolution 2417 relating to conflict-induced food insecurity,^v the UK should raise urgent concerns with the Nigerian authorities regarding the link between conflict, access restrictions and famine risk.
- 1.13. The UK should carefully consider the humanitarian implications of further aid cuts to Nigeria and urgently work with other donors to fill potential gaps in the emergency response. The Foreign Commonwealth and Development Office (FCDO) should immediately release budget plans for the remainder of 2021 and for 2022, and seek to maintain investment in key areas essential to the implementation of the Integrated Review, such as protection of civilians, health, nutrition, food security and livelihoods.

2. Humanitarian access and providing principled humanitarian assistance in north-east Nigeria

Insecurity and humanitarian aid operations

- 2.1.1. The biggest impediment to humanitarian assistance in north-east Nigeria is the ongoing insecurity created by violent conflict and attacks by NSAGs. Borno state and neighbouring regions continue to suffer from widespread armed activity in and around the main transport routes and in several population centres. Exchanges of fire, ambushes, the use of improvised explosive devices (IEDs), and the presence of unexploded explosive ordnance (UXOs), create serious risks to aid workers, as do increasing numbers of targeted attacks and kidnappings.
- 2.1.2. For example, insecurity has forced AAH and NRC to temporarily suspend some aid programming and relocate some staff from Damasak^{vi} following attacks against aid agencies in mid-April 2021. Humanitarian organisations had been delivering aid to 85,000 people in the town, which had been identified by the Nigerian authorities as an area of safe return for Nigerian refugees who have previously fled to Niger.
- 2.1.3. Attacks by NSAGs on major towns that have a strong Nigerian military presence have increased during the last year and a half. Insecurity along main road arteries has also increased, including abductions and violence against humanitarian workers traveling by road. This deterioration in security can be traced back to mid-2019 when the Nigerian military decided to reduce its presence in more remote locations and along transport routes in favour of concentrating forces in super camps in larger ‘garrison’ towns.^{vii}
- 2.1.4. As access by road becomes more unsafe, the transport and distribution of large quantities of humanitarian goods is becoming more challenging. Humanitarian organisations have also become more dependent on humanitarian flights provided by the UN to reach remote locations – which have limited routes and schedules due to funding gaps.

Military regulations

➤ Impact on the civilian population

- 2.1.5. The declaration of a state of emergency covering Adamawa, Borno and Yobe states in 2013 continues to be the basis for allowing the Nigerian military to play a significant role in civilian life in north-east Nigeria. Counterterrorism operations in this region have severely hampered livelihood opportunities for the civilian population. A long list of counterterrorism regulations imposed by the Nigerian military based on security concerns have disrupted fisheries, agriculture, trade and livestock. Some measures have been lifted since 2013, but internally displaced people (IDPs), for example, continue to face constraints on their access to agricultural land and face restrictions in term of the types of/height of crops that they can plant. In addition, certain fertilisers have been banned.^{viii}
- 2.1.6. Restrictions on freedom of movement further limit agricultural production and other livelihoods. For example, road closures and the overall security situation make it often impossible to obtain and transport agricultural supplies and equipment, or access marketplaces. Many farmers report that

they are no longer able to cope, either dumping produce they cannot consume or stopping farming altogether to rely on humanitarian assistance.^{ix} This has serious implications for food security and nutrition.^x

➤ **Impact on humanitarian aid**

- 2.2.1 Military authorities also impose profound restrictions on humanitarian organisations. For example, military regulations and the enforcement of the ‘Nigerian Terrorism Prevention Amendment Act^{xi} and other wide-ranging counterterrorism laws by the Nigerian army have led to significant restrictions of movements of aid workers and humanitarian vehicles. They regulate humanitarian procurements and logistics pipelines and can increase the risk of arbitrary detentions of humanitarian personnel.
- 2.2.2 The lack of strong communication lines and coordination structures between the Nigerian military and international aid agencies, including the UN, is a further challenge. While there has been an improvement in NGO-military relations since 2019, there are still persistent weaknesses that stem from the lack of a shared understanding of the role of aid agencies, and the principles and frameworks under which they operate.
- 2.2.3 For example, the Nigerian military requires aid agencies to use armed convoys to transport humanitarian goods in large parts of Borno state. It is the long-standing policy of the humanitarian community, endorsed by the Inter-Agency Standing Committee (IASC) as the highest-level humanitarian coordination forum of the UN system, that military convoys should only be used voluntarily and as a last resort in order to safeguard operational independence, neutrality and impartiality.^{xii}
- 2.2.4 The Nigerian military has previously made unfounded allegations that some aid agencies have had unlawful links to non-state armed groups, stating in several cases that specific aid organisations should be closed down and their staff detained. These unfounded allegations and restrictive measures have led to fears of arbitrary decisions and demonstrate a lack of understanding of aid agencies’ humanitarian mandates and ways of working.
- 2.2.5 Civilian-military coordination challenges are common in the Sahel and Lake Chad Basin regions, however good practices exist that can be built on in north-east Nigeria. In the Sahel for example, the FCDO and Ministry of Defence are supporting a strengthening of civilian-military capacity and coordination.^{xiii} In Nigeria, the UK has been involved in training the military for some time and has supported the UN to improve civilian-military coordination. The Integrated Review provides an opportunity to increase these efforts by bringing together defence, diplomacy and development in pursuit of the cross-government objectives of reducing the frequency and intensity of conflict and instability, to alleviate suffering and to minimise the opportunities for state and non-state actors to undermine international security.^{xiv}

3. Preventing and responding to food and health insecurity, malnutrition and famine

- 3.1. The Integrated Review includes commitments to famine prevention and resilience building. Further, food insecurity, famine prevention and global health security are UK Overseas Development Assistance (ODA) priorities. The UK-led G7 Famine Prevention and Humanitarian Crises Compact identifies north-east Nigeria as at immediate risk of famine and stresses that this is inherently linked to conflict and humanitarian access restrictions.

- 3.2. Since 2016, Integrated Food Security Phase Classification (IPC) analyses conducted in Nigeria has consistently revealed food emergencies and pockets of famine.^{xv} In the north-east, the number of food insecure people has doubled between 2019 and 2020, reaching 9.2 million people,^{xvi} with this expected to rise to 13 million during 2021 as conditions deteriorate substantially during the May-August 'lean season'.^{xvii} Over a million children under 5 are acutely malnourished,^{xviii} and Nigeria has the second highest number of stunted children in the world representing 40 percent of children in the north-east of the country.^{xix}
- 3.3. The lack of livelihood opportunities is one major cause of severe food insecurity and malnourishment: unemployment rates in the region are 38.4 percent in Adamawa and 33 percent in Yobe state. This is exacerbated by a lack of access to humanitarian assistance and markets. The populations suffering from the most acute form of food insecurity are living in areas where humanitarian access is most limited and markets have ceased to function normally. For example, Maiduguri has ceased to be a major regional cattle market due to violence and movement restrictions. Further, access to Lake Chad for fishing or farming activities is now restricted by the authorities or too dangerous because the region is controlled by NSAGs. Insecurity further hampers seasonal migration and major trade routes in the wider region, including the cross-border movement of cattle herders between Nigeria and neighbouring countries.
- 3.4. The return of internally displaced people to their towns and villages or origin could improve food security by enabling farmers to access their land and farms. However, AAH and NRC are concerned that the security situation, and the lack of basic services, infrastructure and livelihood opportunities, mean the current circumstances are not conducive to safe and sustainable returns.
- 3.5. Improving household capabilities to produce their own food is critical to alleviating the fragile food security situation, in particular supporting vulnerable populations to cope with food gaps created by displacement, market price inflation and livelihood disruptions. This is rendered increasingly impossible as forced displacement, violence and restrictive measures reduce access to land.
- 3.6. North-east Nigeria has some of the world's highest rates of infant and maternal mortality.^{xx} There are frequent outbreaks of acute watery diarrhoea, measles, and malaria. The risk of disease outbreaks and famine is expected to peak in May-November 2021 with the period known as the 'lean season'.^{xxi} This is partly driven by lack of access to health facilities and poor water, sanitation and hygiene (WASH). To counter the high rates of child acute malnutrition, the latest IPC projections recommend scaling up treatment for acute malnutrition for children living in hard-to-reach areas with low existing aid coverage, improving immunisation for polio and measles and strengthening the integration of WASH interventions into other services.^{xxii}
- 3.7. This matters for health security and the reduction of communicable disease outbreaks. Malnutrition compromises natural immunity leading to increased susceptibility to infection and more frequent and severe episodes of communicable diseases.^{xxiii} Early studies indicate that Covid-19 fatality rates are higher in populations with elevated rates of under nutrition.^{xxiv} Since 2015, the UK has reached 7.5 million people with WASH interventions and 14 million women and children with nutrition-related interventions in Nigeria.^{xxv} Delivery of the Integrated Review and UK's ODA global health security agenda requires maintaining support for WASH, health systems-strengthening and increasing access to basic health services including nutrition, to reduce famine risk and vulnerability to communicable disease outbreaks.
- 3.8. In this context it is worth noting that the UN-led Humanitarian Response Plan (HRP) for Nigeria was only 48 percent funded in 2020 and the prospects for 2021 look even bleaker.^{xxvi} The UK has, until now, been the second largest aid donor to Nigeria. The humanitarian community in Nigeria does not

yet know the FCDO's country budget for 2021-22, following the reduction to the UK ODA budget to 0.5 percent of Gross National Income. Unconfirmed reports suggest that the FCDO's Nigeria country budget could be reduced by up to 60 percent. Although there are indications so far are that budgets for nutrition and health projects have been secured, AAH and NRC are concerned that any reduction in UK aid will have a significant impact on the safety and survival of potentially millions of conflict-affected people in north-east Nigeria, and severely undermine the prioritise outlined in the Integrated Review.

Notes

ⁱ Africa Center for Strategic Studies, Africa Shifting Security Landscape Report, Jan 2021: <https://africacenter.org/spotlight/spike-militant-islamist-violence-africa-shifting-security-landscape/>

ⁱⁱ UN OCHA Humanitarian Response Plan, March 2021: https://www.humanitarianresponse.info/sites/www.humanitarianresponse.info/files/documents/files/ocha_nga_humanitarian_response_plan_march2021.pdf

ⁱⁱⁱ UN Global Report on Food Crises 2021: <https://www.fsinplatform.org/sites/default/files/resources/files/GRFC%202021%20050521%20med.pdf>

^{iv} UN OCHA, Humanitarian Response Plan 2021: https://reliefweb.int/sites/reliefweb.int/files/resources/ocha_nga_humanitarian_response_plan_march2021.pdf

^v UN Security Council Resolution 2417: Protection of Civilians in Conflict: <http://unscr.com/en/resolutions/2417>

^{vi} NORTH-EAST NIGERIA: Flash Update #1, April 2021.

^{vii} Referred to as the 'Super Camp' strategy. For more details see for example: <https://reliefweb.int/report/nigeria/nigeria-s-super-camps-leave-civilians-exposed-terrorists>

^{viii} From unpublished INGO research and field assessments 2020.

^{ix} *La malédiction Boko Haram continue de frapper la pêche, principale richesse du lac Tchad*, *Journal Le point économique*, August 2018. https://www.lepoint.fr/economie/la-malediction-boko-haram-continue-de-frapper-la-peche-principale-riche-esse-du-lac-tchad-10-08-2018-2242736_28.php

^x For details of the 2021 G7 Famine Prevention Compact see : <https://www.gov.uk/government/publications/g7-foreign-and-development-ministers-meeting-may-2021-communique/g7-famine-prevention-and-humanitarian-crises-compact>

^{xi} For details of the 2013 law and its amendments see: [terrorism_bill.pdf \(placng.org\)](https://www.placng.org/terrorism_bill.pdf)

^{xii} IASC Non-Binding Guidelines on the use of Military Escort 2013: https://www.unocha.org/sites/unocha/files/Armed%20Escort%20Guidelines%20-%20Final_1.pdf

^{xiii} UN OCHA, Non-Financial Commitments to Central Sahel, October 2020: <https://www.unocha.org/centralsahel2020>

^{xiv} For details of the 2021 G7 Famine Prevention Compact see : <https://www.gov.uk/government/publications/g7-foreign-and-development-ministers-meeting-may-2021-communique/g7-famine-prevention-and-humanitarian-crises-compact>

^{xv} IPC Analyses conducted in November 2016, March and October 2017 and November 2018.

^{xvi} UN WFP Global Report on Food Crises 2021: https://docs.wfp.org/api/documents/WFP-0000127343/download/?_ga=2.145097652.1400326936.1623171737-1335388774.1623171737

^{xvii} The 'lean season' is the period between planting and harvesting when livelihoods opportunities are scarce and incomes and access to food plummet. Food stocks dwindle and low-income families can be regularly forced to skip meals.

^{xviii} Integrated Phase Classification Report, north-east Nigeria, March 2021: https://reliefweb.int/sites/reliefweb.int/files/resources/IPC_Nigeria_Acute_Malnutrition_2020Sept2021Aug_Report.pdf

^{xix} Global Report on Food Crises 2021, see: <https://www.wfp.org/publications/global-report-food-crises-2021>

^{xx} Unicef, Nigeria National Nutrition and Health Survey 2018: <https://www.unicef.org/nigeria/media/2181/file/Nigeria-NNHS-2018.pdf>

^{xxi} Ibid.

^{xxii} IPC Report on Acute Malnutrition in Nigeria, Sept 2021-August 2021 Analysis: <https://reliefweb.int/report/nigeria/ipc-acute-malnutrition-analysis-september-2020-august-2021-issued-march-2021>

^{xxiii} WHO Technical note: Communicable Disease and Severe Food Shortage: <https://www.ncbi.nlm.nih.gov/books/NBK304206/>

^{xxiv} Merton, S E & Penalvo, The Burden of Malnutrition and Fatal COVID-19: A Global Burden of Disease Analysis, Jan 2021: <https://www.frontiersin.org/articles/10.3389/fnut.2020.619850/full>

^{xxv} UK Devtracker, Nigeria Country Profile: <https://devtracker.fcdo.gov.uk/countries/NG/>

^{xxvi} UN OCHO Humanitarian Response Plan, Nigeria, March 2021: https://reliefweb.int/sites/reliefweb.int/files/resources/ocha_nga_humanitarian_response_plan_march2021.pdf

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