

FEDERAL REPUBLIC OF NIGERIA

**WORLD BANK
PROGRAM-FOR-RESULTS FINANCING**

**NIGERIA COVID-19 ACTION RECOVERY AND
ECONOMIC STIMULUS
(NIGERIA CARES)**

DRAFT REPORT

**ENVIRONMENT AND SOCIAL SYSTEMS
ASSESSMENT
(ESSA)**

SEPTEMBER 2020

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LIST OF ACRONYMS

AU	African Union
CARES	COVID-19 Action Recovery and Economic Stimulus
CDP	Community Development Plans
CEDAW	Conventions on the Elimination of all forms of Discrimination against Women
CRA	Child's Right Act
CSA	Climate Smart Agriculture
CSDA	Community and Social Development Agency
DLI	Disbursement Linked Indicator
DRI	Disbursement Result Indicators
DSVRT	Domestic and Sexual Violence Response Team (DSVRT)
EIA	Environmental Impact Assessment
EMS	Environmental Management System
E&S	Environment and Social
ESCP	Environmental and Social Commitment Plan
ESHS	Environmental Social and Health Systems
ESRS	Environmental and Social Review Summary
ESSA	Environmental and Social Systems Assessment
FCT	Federal Capital Territory
FEC	Federal Executive Council
FMARD	Federal Ministry of Agriculture and Rural Development
FME	Federal Ministry of Environment
FGM	Female Genital Mutilation
GBV	Gender Based Violence
GDP	Group Development Plans
GEEP	Government Enterprise and Empowerment Program
GHG	Greenhouse Gas
GON	Government of Nigeria
GRM	Grievance Redress Mechanism
IA	Implementing Agency
ILO	International Labor Organization
IPF	Investment Project Financing
IPV	Intimate Partner Violence
IT	Information and Technology
IVA	Independent Verification Agent
LIPW	Labor Intensive Public Works
LMP	Labor Management Procedure
MFBNP	Ministry of Finance, Budget and National Planning
MSE	Micro and Small Scale Enterprises
NASSCO	National Social Safety-Net Coordinating Office
NCSC	National CARES Steering Committee
NCTC	National CARES Technical Committee
NDC	Nationally Determined Contribution
NESREA	National Environmental Standards and Regulations Enforcement Agency
NGF	Nigeria Governors Forum
OHS	Occupational health and Safety

PAP	Program Action Plan
PDO	Program Development objective
PPE	Personal Protective Equipment
PWF	Public Workfare
SCCU	State CARES Coordinating Unit
SCSC	State CARES Steering Committee
SCTU	State Cash Transfer Unit
SDG	Sustainable Development Goals
SEP	Stakeholder Engagement Plan
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SGT	Special Grant Transfer
SME	Small and Medium Scale Enterprises
UN	United Nations
UNCED	United Nations Conference on Environment and Development
USD	United States Dollar

EXECUTIVE SUMMARY

1. World Bank is proposing to support the states in Nigeria with a program for results (PforR) instrument in a program referred to as Nigeria COVID-19 Action Recovery and Economic Stimulus (Nigeria CARES) (hereafter, the Program). The proposed Program Development Objective (PDO) of the PforR is to protect livelihoods and food security of poor and vulnerable families and facilitate recovery of local economic activity in all participating states across Nigeria. The program will leverage on existing World Bank operations anchored on community-based approaches and structures in relation to multisector interventions such as the Community and Social Development Agency(CSDA)/Community Development Program (CSDP), State Cash Transfer Units (SCTU), State FADAMA or Agriculture Development Agencies, State Job Creation Unit/ SME Support Units supported by the Government Enterprise and Empowerment Program (GEEP).
2. A State Level Steering Committee comprising of Commissioners and Permanent Secretaries of the key sectoral Ministries and Heads of Agencies will be constituted to provide oversight and policy guidance to the program. The Steering Committee will be led by the Commissioner responsible for Planning and Budget in the State. A small unit for coordinating the state CARES program – State CARES Coordinating Unit (SCCU) – comprising mainly of 4-5 planning and monitoring officers will be housed in the State Budget and Planning Unit. SCCU will be responsible for: (i) serving as the secretariat of State CARES Steering Committee; (ii) undertaking periodic collation of results from delivery units; and (iii) monitoring progress of implementation and disbursements against results. The SCCU will work close and relate directly with the delivery platforms for the three Results Areas, namely, the State Cash Transfer Unit (SCTU), The State Public Workfare Unit (PWFU) and the State Community and Social Development Agencies (CSDAs) for Result Area 1; The FADAMA unit of the State Ministry of Agriculture for Result Area 2 and State owned MSE support agencies working in close partnership with the GEEP platform of the Bank of Industry for Result Area 3. Also, in some states, the State MSE platforms with sufficient and assessed capability will work solely (i.e., take full responsibility) for delivery of the DLIs in Result Area 3.
3. At the Federal Level, the PforR will have a three-tier formal structure for broad program level oversight. The key features of the proposed organizational structure and functional responsibilities at the Federal levels are as follows: The Federal CARES Steering Committee (FCSC), chaired by the Federal Ministry of Finance, Budget, and National Planning (FMFBNP), which will provide overall policy direction to the Program and they will be comprised of key decision makers from relevant Ministries, Departments and Agencies (MDAs); The Federal CARES' Technical Committee (FCTC), which will be responsible for Program oversight, overall technical guidance, coordination, strategic direction, and review and approval of the annual work program and budget of the Federal CARES Support Unit; and The Federal CARES Support Unit (FCSU), which will be responsible for Program management, day-to-day Program support at the Federal level and for supporting the States on technical and capacity issues, financial management, monitoring and evaluation, and peer learning.

4. The PforR focuses on supporting the mitigation and recovery efforts of the states, in particular expenditures to protect livelihoods of existing and newly poor and vulnerable households, and support local economic activity, especially that of M&SMEs, and enable recovery over the next 18 months to 2 years. The PforR consists of three result areas, namely:
 - a. Result area 1: This result area focuses on increased social transfers, basic services, and livelihood support to poor and vulnerable households. The main activities include: State Social Transfers (SST) to Aged, physically challenged, chronically ill, & urban poor with the aim to enhance consumption; Labour Intensive Public Work (LIPW) involving immediate employment opportunities in social sectors and works; Livelihood grants to provide short livelihoods and soft skills training and one-off payments to economically active and self-employed youth and women in Nigeria; and Community and Vulnerable Group Basic Service Delivery in infrastructure.
 - b. Result Area 2: This result area will focus on increasing food security and safe functioning of food supply chains for poor households. It aims to mitigate the impacts of the COVID-19 pandemic on food security of the poor and vulnerable households and facilitate the safe functioning of food supply chains. The specific focus includes: Supporting the poor and vulnerable to increase food production by supporting groups of small-scale farmers to access various inputs and services for crop and livestock (small ruminants) production; Provision of labour-intensive agricultural infrastructure involving the improvement and rehabilitation of existing tertiary irrigation canals and feeder roads; establishment of boreholes and tube wells; and soil conservation; provision of agricultural assets for production and mitigation of food loss and waste; and Upgrading wet markets involving the upgrading of water and sanitation infrastructure in existing wet markets.
 - c. Result Area 3: This result area will focus on facilitating the recovery and enhancing capabilities of MSEs. It aims to support local economies, in particular micro and small-scale enterprises (MSEs) to resume activities that may have been hampered since the start of the COVID 19 pandemic. Under this result area, the PforR will focus on: Easing financing constraints by provision of conditional capital Grant for co-financing up to 40% of NEW loans originated by qualified financial institutions to qualified beneficiaries in COVID-19 crisis; Provision of employment and job creation grants involving conditional grants to support operational expenditure post COVID-19; and Enhancing of MSEs capability through provision of conditional grants to support adoption and upgrade of digital technology.
5. The Program will exclude activities that do not meet World Bank policy on eligibility for PforR financing. Specifically, the borrower shall ensure that the Program excludes any activity, for example large scale construction works, construction of dams, primary and secondary canals which, in the opinion of the World Bank, are likely to have significant adverse impacts that are sensitive, diverse or unprecedented on the environment and/or requires significant land acquisition / resettlement of affected people, as defined in the World Bank policy on PforR financing (July 2019), as well as works, goods and consultancy

contracts above the Operations Procurement Review Committee thresholds. Any land that will involve displacement/resettlement will not be eligible for community micro projects. The World Bank will support Program execution to ensure compliance with PforR policy requirements during implementation. In line with Nigeria CARES PforR activities outlined above, the exclusion of the above activities will not impact the achievements of the results under the Program.

6. The Environmental and Social Systems Assessment (ESSA) examines the extent to which the Federal and State Government's existing environmental and social management systems: operates within, an adequate legal and regulatory framework to guide environmental and social impact assessments, mitigation, management and monitoring at the PforR Program level; incorporate recognized elements of good practice in environmental and social assessment and management. The ESSA thereafter defines measures to strengthen the system and recommend measures that will be integrated into the overall Program. The ESSA is undertaken to ensure consistency with six core principles and key planning elements of PforR ESSA.
7. In line with the six core principles the relevant risks within the proposed Result Areas under the PforR cover environmental and social issues and include:
 - a. Air, noise, water, soil and groundwater pollution, waste management, traffic, resource efficiency, biodiversity loss as a result of rehabilitation of secondary and tertiary irrigation canals; tertiary roads; agricultural warehouse; sanitary infrastructures in wet market.
 - b. Occupational Health and Safety (OHS) issues both COVID-19 and non-COVID-19
 - c. Waste management, pest management and GHG emissions as a result of increased agricultural activities and operation of SMEs.
 - d. Labour and occupational health and safety issues due to labour related actions in agriculture, during Labour Intensive Public works and SMEs activities under the program.
 - e. Risk of exclusion of vulnerable and marginalized individuals / groups/disability exclusion, elite capture, political interference, SEA/SH, Capacity to capture beneficiaries etc.
 - f. Possibility of gender based violence (GBV) and intimate partner violence (IPV) as programs that provide cash transfer and other social support can, in some circumstances, be associated with increases in GBV and IPV. Also, the project envisions a range of rehabilitation projects, labour intensive activities and enhancement of employment in SMEs and these are activities that can increase GBV risks due to changes in labour patterns and income, creation of new hot spots for vulnerability, and changing community dynamics.
8. Environmental and social risks have been assessed and deemed to be substantial. The substantial assessment was based on the fact that there will be rehabilitation and upgrading of infrastructure and possible construction of new infrastructure during implementation of community micro projects. Although adverse environmental and social impacts are not envisaged under the circumstances, current weaknesses in the borrower's system and lack of capacity to address the environmental and social impacts and contextual risks (climate change,

insurgency, banditry and farmers-herders conflicts) may limit the PforR's ability to achieve its environmental and social operational objectives.

9. The ESSA was prepared by Bank staff through a combination of reviews of existing program materials and available technical literature, interviews and extensive consultations with government staff, non-governmental organizations, regulatory agencies, farmers, private sector organizations and sector experts. An environmental and social risk screening was undertaken at the concept stage. The ESSA process was informed by the Bank Guidance on PforR Environmental and Social System Assessment (July 1, 2019). The findings, conclusions and opinions expressed in the ESSA document are those of the Bank.
10. Extensive consultations have been carried out despite the speed and urgency with which this project has been developed to meet the growing economic crisis and threats Due to COVID-19. The consultations were virtual in line with World Bank's guidelines for consultation during the pandemic. The consultations were limited to the platforms implementing the program. Thus, the Nigeria CARES teams including the E&S teams and representative of the implementing agencies in all the States and FCT, farmers, and the federal team have been consulted. During the consultation, the detail of the PforR program was presented to the participants after which some questions were raised concerning the E&S systems of the states. Each of the States team were given some time to respond. They also provided addition written responses and documentations. The States were also given opportunity to ask questions about the program and the E&S requirements which the World Bank team provided some clarifications. After the general consultations, some states were thereafter contacted for further information on specific issues thereafter. Further consultations was carried out with MSE's that are proposed to benefit from Result Area 3 on 3rd September 2020
11. Detailed analysis was carried out to determine the rage of environmental and social risks and benefits that are associated with the PforR program based on each of the DLIs. The environmental benefits of the PforR program are significant giving that the proposed activities regarding community micro projects, for example, drinking water supply, sanitation management in wet markets, and waste management, supply of inputs, including improved seeds, fertilizer and soil conservation, may significantly improve the environment, health and safety conditions of local communities and offer climate Co-Benefits. The environmental risks, as indicated, are substantial as the Program is expected to have direct and indirect effect on the physical environment. For example, activities associated with DLI 1.4 which include implementation of community micro-projects (e.g. basic services-health, education, water, roads, skill centers etc.) will lead to air pollution, ground water pollution, loss of biodiversity, noise, water pollution and waste generation. Also, potential environmental risks associated with DLI 2.4 include air, noise, water, pollution, waste issues, as a result of physical works associated with upgrading of sanitary infrastructures in existing wet market. Equally, improved agricultural infrastructure (DLI 2.2) will lead to GHG emissions as a result of increased agricultural activities. Also, Increased operations of the MSEs due to operational support grant (DLI 3.2 may lead to increased carbon emission (for MSEs that burn a lot of fossil fuels).
12. The Program being an intervention program to facilitate recovery from economic crisis as a result of COVID-19 pandemic, has a lot of social benefits that will result from the achievement

of the DLIs. For example, the implementation of activities related to DLI 1.1, that is social transfers to aged people, chronically ill, urban poor, widows and new poor (Due to COVID-19) is expected to facilitate poverty reduction (some people will exit from poverty especially the new poor), enhanced nutrition outcomes and food security. It will also result in enhanced longevity given available funds to treat chronically ill people who will receive the transfers. The payment system which is through payment service providers (PSP) will enhance financial inclusion in Nigeria with all its associated benefits.

13. Also, substantial social risks are associated with the Program. For example, regarding the achievement of DLI-1.1, there is a possibility of indirect capture by elites who may divert the transfers (without due process) to their favored vulnerable and poor people. Besides, a lack of understanding of selection and grievance complaint processes by beneficiaries and non-beneficiaries could create tension and may result in conflict (for example civil demonstrations). Although, the distribution of agricultural inputs to farmers (DLI 2.1) could lead to increased food production, it could equally result in increased poverty and vulnerability, especially if vulnerable groups are discriminated against in the distribution of agricultural inputs. There is also possibility of sexual exploitation and abuse / sexual harassment during the distribution of agricultural inputs.
14. Following the identification of environment and social risks, the E&S management system in place to manage the identified risks were assessed. The assessment was done using the following criteria: strengths of the system, or where it functions effectively and efficiently and is consistent with Bank Policy and Directive for Program-for-Results Financing; inconsistencies and gaps between the principles espoused in Bank Policy and Directive for Program-for-Results Financing and capacity constraints; actions to strengthen the existing system. Information from this analysis, identification of gaps and opportunities/actions, were used to inform the recommendations and Program Action Plan (PAP).
15. The recommendations are as follows:
 16. In the short run, State governments should institute a scheduled program to build and strengthen the capacity of technical staff of the States Ministry of Environment to be able to manage and monitor environmental assessment processes, environmental pollutions, hazards and other environmental issues in the state. At the long run, there is need to equip the State Ministries of Environment with necessary facilities and gadgets (including laboratory) to be able to monitor and report environmental issues (pollution, degradation, hazards etc.) in the states.
 17. State governments should formulate/develop guidelines and manuals for mainstreaming stakeholder engagement process, environmental, and OHS issues into the implementation of the Program. The World Bank Groups' Environmental Health and Safety guidelines will be adapted for environmental and OHS issues. The manual should help guide the operation of MSE's, contractors and workers and laborers (including those involved in community micro-projects) who are part of Nigeria CARES PforR. The guidelines should contain the requirement of adequate on-site training on OHS issues to workers and laborers, provision

of personal protective equipment (PPE) and other guidelines relating to specific activities of MSE's. This guideline would be developed before commencement of program implementation

18. Conduct half yearly review and monitoring of progress on environmental and social issues, especially regarding the compliance of the Program activities with the environmental and social standards and regulations.
19. In the short run, strengthen stakeholder engagement and the existing GRM in CSDP, SCTU, FADAMA State Job Creation Unit/ SME Support Units and GEEP to build the confidence of the beneficiaries on the system GRM. In the long run, States without an agency responsible for grievance redress and peaceful resolution of disputes should institute a legal framework and create a department to facilitate grievance redress.
20. Affected states to set up community level (through relevant traditional rulers/ institution) conflict resolution committee to address conflict related to headers / farmers / water users' conflicts and other conflicts related to marginalization of ethnic minority in the program.
21. States without a gender-based violence response team should quickly set up Response Team for quick response to issues of GBV in the states and support it with robust public enlightenment program about the evils of Sexual Exploitation and Abuse and Sexual Harassment.
22. States should conduct security needs assessment which would serve as the basis for dealing with security issues.
23. All community micro projects should be designed to include universal access for all persons living with disability and also ensure accessibility to the very poor and all minority ethnic groups in the program.
24. All State government in collaboration with the SCCU should develop, adopt and implement a voluntary land donation protocol to screen all land selected for micro projects to ensure that all land chosen for community micro project are community land, government land or individual land freely donated and free of all encumbrances. The land donation protocol must include the principle of informed consent and the power of choice, monitoring mechanism and grievance redress mechanism. As indicated in the exclusion criteria, any land selected for micro project that will involve displacement / resettlement will not be eligible for community micro projects
25. The program action plan is presented in Table 1ES below.

Table 1 ES: Program Action Plan (PAP) for Environmental and Social Management

S/ No	Action Description	Due Date	Responsible Party	Completion Measurement
1	Institute a scheduled Capacity building program to strengthen the capacity of technical staff of the States Ministry of Environment on environmental management, environmental and social assessment and OHS skills and use of PPEs.	December 2020. To be implemented throughout Program Implementation	State CARES Coordinating Unit (SCCU)	Submit Capacity /Training plans /Modules, Lists, of participants including Number of technical staff
2	Conduct environmental and social screening of program activities, half yearly review and monitoring of progress on environmental and social issues and annual environmental and social audit	Environmental screening before program activities Review and monitoring within 3 months of start of program implementation	Federal CARES Support Unit; State CARES Coordinating Unit and Implementing Agencies	Completed report with recommendations about E&S issues, including the progress of the implementation of actions indicated in this table.
3	Formulate/develop guidelines and manuals for mainstreaming stakeholder engagement process, environmental, and OHS issues (including training and use of PPE) into the implementation of the Program.	Prior to program implementation	Federal CARES Support Unit; State CARES Coordinating Unit, States Ministry of Environment	Completed guidelines in booklet form disseminated to stakeholders, training provided, and the guidelines operationalized
4	Strengthen (formalize, document and disseminate) existing GRM in CSDP, SCTU, FADAMA State Job Creation Unit/ SME Support Units and GEEP to make it more robust and build trust ¹ ..	December 2020	Federal CARES Support Unit; State CARES Coordinating Unit and Implementing Agencies and State Legal Unit/Ministry of Justice	Revise, Complete GRM report and disseminate GRM procedures to all stakeholders.

¹States without GRM legal framework should be encouraged to institute a legal framework and create an agency to facilitate grievance redress with the first year of program implementation.

5	States to set up community level (through relevant traditional rulers/ institution) conflict resolution committee to address conflict related to headers / farmers / water users' conflicts and other conflicts related to marginalization of ethnic minority in the program	December 2020	State CARES coordination Unit, CSDA, Ministry of Local Government and Chieftaincy,	List and contacts of committee members and Memorandum of inauguration, minutes of committee meetings.
6	States without a GBV response team should quickly set up and publicize its Response Team for response to issues of SEA/SH and support it with robust public enlightenment program.	Dec. 2020 /Jan 2021	States Ministry of Women Affairs and Social Development and Ministry of Justice	Document setting out referral pathway and available service provider by the relevant MDA
7	Community management committees including representatives from different categories of persons in the community including community leaders, youths, women groups and PWD's should be set to manage the implementation of community micro projects.	December 2020	State CARES coordination Unit, States Ministry of Women Affairs and Social Development, CSDA	Design of Micro projects with universal access, list of committee members, Minutes of committee and community meetings on selection and design and implementation of micro projects.
8	All SCCU should develop, adopt and implement a voluntary land donation framework/protocol in line with World Bank Guideline to screen all land selected for micro projects. All donated land must be free of economic, social and physical encumbrances.	December 2020	SCCU, State Ministry of Land, Urban and Physical Development and Ministry of Local Government and Chieftaincy Affairs	Developed voluntary Land donation framework/protocol with screening checklist disclosed to all stakeholders
9	Ensure Engagement of Environmental and social specialist in the PIU at the federal and state level (for states without environment and social specialist in the implementing agencies).	Before Program implementation	Federal CARES support unit and state Cares Coordinating Units	Inclusion of Environmental and social Specialist in the team
10	Conduct Security Need Assessment	January, 2021	Northeast and Northwest States	Development of Security Action Plan

SECTION I: BACKGROUND AND SCOPE

1.1: Program Description

26. World Bank is proposing to support the states in Nigeria with a program for results (PforR) instrument in a project referred to as Nigeria COVID-19 Action Recovery and Economic Stimulus (Nigeria CARES) (hereafter, the Program). The program was prompted by the need to facilitate the recovery of affected households and also cushion the impact of the economic crisis due to COVID-19. The Program will target existing and new vulnerable poor households, their food supply chain, and micro and small enterprises affected by COVID-19. The proposed Program Development Objective (PDO) of the PforR is to protect livelihoods and food security of poor and vulnerable families and facilitate recovery of local economic activity in all participating states across Nigeria. The PDO will be monitored through the following PDO level outcome indicators:
 - a. Number of beneficiaries of targeted safety nets and with access to basic social services;
 - b. Number of farmers supported to increase food production;
 - c. Number of vulnerable and viable firms supported by the Program.

27. The program will leverage on existing World Bank operations anchored on community-based approaches and structures in relation to multisector interventions such as the Community and Social Development Agency(CSDA)/Community Development Program (CSDP), State Cash Transfer Units (SCTU), State FADAMA or Agriculture Development Agencies, State Job Creation Unit/ SME Support Units supported by the Government Enterprise and Empowerment Program (GEEP).The summary of the result areas, major interventions and DLIs is presented in Table 1.1 below. The summary of Result Areas, DLRs, DLIs, Disbursement Timing, Verification Procedure, and maximum amount achievable (in million, USD) per State is shown in Annex 1.

Table 1.1: Nigeria Cares result areas, major interventions and DLIs

Result Area	Major Intervention	DLIs
1: Increased social transfers, basic services, and livelihood support to poor and vulnerable households	State Social Transfers (SST)	1.1 Number of beneficiaries receiving periodic transfers disaggregated by vulnerability profile.
	Labor intensive public works (LIPW)	1.2 Number of beneficiaries engaged and deployed into LIPW activities in social services and works.
	Livelihood Grants	1.3 Number of beneficiaries supported with livelihood grant.
	Community and Vulnerable Groups Basic Service Delivery	1.4 Number of beneficiaries of completed and functional micro projects.
2: Increasing food security and safe functioning of food supply chains for poor households	Support to increase food production	2.1 Number of farmers utilizing agricultural inputs and services
	Labor-Intensive Agricultural Infrastructure	2.2 Number of individuals accessing improved agricultural infrastructure
	Agricultural assets for production and mitigation of food loss and waste	2.3 Number of farmers utilizing agricultural assets (production and small-scale primary processing)
	Upgrading wet markets	2.4 Number of existing wet markets with upgraded water and sanitation.
3: Facilitating Recovery and Enhancing Capabilities of MSEs	Provision of well-targeted conditional grants to co-finance loans that eligible MSEs received during the COVID-19	3.1. Number of firms receiving matching grants to support new loans originated after Covid-19.
	Extending conditional grants to MSEs cover up 50% portion of its monthly operational cost	3.2. Number of firms receiving operational support grants.
	Supporting adoption of digital payments, integration and IT connectivity costs of MSEs	3.3 Number of firms receiving grants to support IT-enhancement.

28. The PforR institutional arrangement at the State Level is presented in Figure 1.1 while the institutional arrangement at the federal level is presented in Figure 1.2. The proposed PforR will be implemented in all the States and the FCT who have indicated their commitment to participate in the Program. The programme is designed to run for a period of two years (2021 – 2023) and will be implemented using existing structures at the level of the States and the Federal government, without creating any add-on project implementation structure.
29. The management of the Programme at the State level shall be exclusively based on the PforR framework for funding that will grant the State Government autonomy in decision-making. The State structure implementing the DLIs will be responsible for delivering the results in partnership with other stakeholders and for achieving the program objectives. The CARES PforR will place a strong emphasis on the community driven development structures across the result areas and delivery platforms to promote community ownership of, and

responsibility for, operations and maintenance of infrastructure investments, where applicable.

30. A State level Steering Committee comprising of Commissioners and Permanent Secretaries of the key sectoral Ministries and Heads of Agencies will be constituted to provide oversight and policy guidance to the program. The Steering Committee will be led by the Commissioner responsible for Planning and Budget in the State. A small unit for coordinating the state CARES program – State CARES Coordinating Unit (SCCU) – comprising mainly of 4-5 planning and monitoring officers will be housed in the State Budget and Planning Unit. SCCU will be responsible for: (i) serving as the secretariat of State CARES Steering Committee; (ii) undertaking periodic collation of results from delivery units; and (iii) monitoring progress of implementation and disbursements against results.

31. The SCCU will work close and relate directly with the delivery platforms for the three Results Areas. Relevant, existing, and robust platforms identified for the implementation of the three Result Areas of the PforR are as follows:
 - a. *Result Area 1; Social Safety Nets and Basic Service Delivery*: The State Cash Transfer Unit (SCTU), The State Public Workfare Unit (PWFU) and the State Community and Social Development Agencies (CSDAs) will be responsible for implementation and delivering the DLIs. Some States, where these platforms are not available, will use other agencies and platform with mandate and responsibility for delivery on the result area. Some States have indicated that the various platforms will be merged to implement the interventions supported by the PforR through a pro-poor and basic service delivery organization.
 - b. *Result Area 2; Food Security and Safe food delivery*: The FADAMA unit of the State Ministry of Agriculture will be responsible for the delivery of the DLIs in this Results Area.
 - c. *Result Area 3; Facilitating Recovery and Enhancing Capabilities of MSEs*: State owned MSE support agencies working in close partnership with the GEEP platform of the Bank of Industry at the State level will take responsibility for the delivery of the DLIs in this Results Area. Some State MSE platforms with sufficient and assessed capability will work solely (i.e., take full responsibility) for delivery of the DLIs.

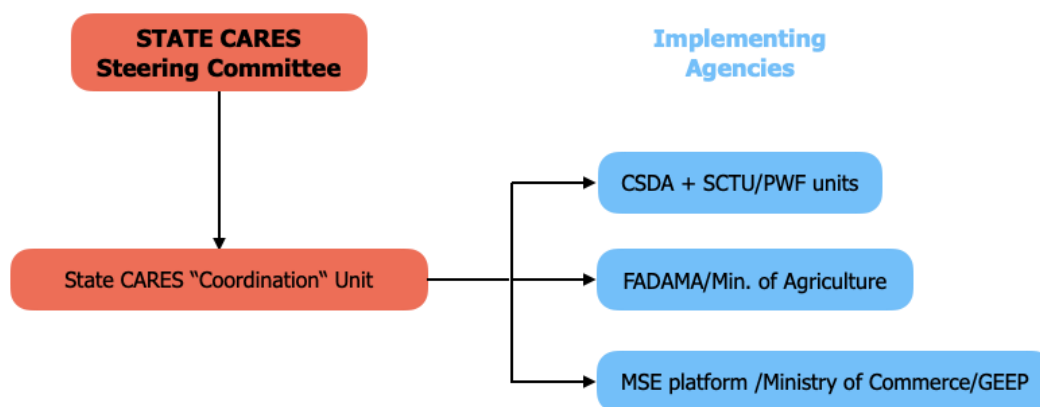


Figure 1.1: State Level Institutional Arrangement for the proposed CARES PforR

32. The PforR will have a three-tier formal structure at the Federal level for broad program level oversight. The key features of the proposed organizational structure and functional responsibilities at the Federal levels are described below:
- a. *The Federal CARES Steering Committee (FCSC)* will provide overall policy direction to the Program. The Steering Committee at the Federal level will be comprised of key decision makers from relevant Ministries, Departments and Agencies (MDAs). The committee will be chaired by the Federal Ministry of Finance, Budget, and National Planning (FMFBNP); and will include representation from the Federal Ministry of Agriculture and Rural Development; Federal Ministry of Labor and Employment; Federal Ministry of Environment; Federal Ministry of Humanitarian Affairs, Disaster Management, and Social Development; Federal Ministry of Education; and Permanent Secretaries for Budget and National Planning. Among key role of the FCSC will be to: (i) Provide overall policy guidance for program implementation; (ii) liaise with the national assembly for adequate allocation of resources; (iii) review project performance annually and provide feedback to government at both Federal and State levels; and (iv) garner political support for the N-CARES programme. The tenure of members will be for the duration of the Program.
 - b. *The Federal Cares' Technical Committee (FCTC)*, will be responsible for Program oversight, overall technical guidance, coordination, strategic direction, and review and approval of the annual work program and budget of the Federal CARES Support Unit. As a sub-committee of the FCSC, the FCTC will be responsible for: (i) providing technical oversight and guidance for programme implementation; (ii) reviewing and approving annual work programme and budget for the Federal CARES Support Unit (FCSU); (iii) reviewing project performance, accounting and audit reports, and enforcing implementation of decisions; (iv) conducting performance review of key FCSU staff; (v) garnering political support for national CDD policy; and (vi) approving amendments to the Project Implementation Manual (PIM) and Implementation Plan. The FCTC will be chaired by the Director (Economic Growth) of the supervising ministry and will comprise of Directorate level representation from the participating MDAs.
 - c. *The Federal CARES Support Unit (FCSU)*, will be responsible for Program management, day-to-day Program support at the Federal level and for supporting the States on technical and capacity issues, financial management, monitoring and evaluation, and peer learning. In this capacity FCSU will be responsible for ensuring that World Bank guidelines and procedures are followed on issues of procurement, disbursements, auditing and overall financial management, and that the environmental and social guidelines are followed across the program implementation delivery units. Key roles and responsibilities of the Federal CARES Support Unit include:
 - i. Recruiting and managing the private sector Independent Verification Agents (IVAs) for the verification of DLIs, and the authorization and disbursement of the funds to State Treasuries;
 - ii. Collating of overall progress of implementation according to the Result

- iii. Providing technical support to assist the State CARES delivery platforms (CSDA, SCTU, PWF, FADAMA, MSE etc.) at State level to build the capacity of platforms and improve delivery efficiency;
- iv. Organizing peer-learning and experience sharing among State teams – facilitated in partnership with Nigeria Governors Forum (NGF) Secretariat;
- v. Organizing quarterly implementation progress review meetings;
- vi. Preparing quarterly progress reports for onward submission to FCSC and the Bank;
- vii. Serving as secretariat for the Nigeria CARES Steering Committee and the Federal CARES Technical Committee;
- viii. Managing and ensuring disbursements of funds to the States.
- ix. Preparing work program and budget; and quarterly, semi-annual, and annual reports on the performance and financial standing of the Project;
- x. Managing the Project M&E and information system, including a database of service providers.

33. FCSU will be headed by a National Project Coordinator (NPC), supported by a core technical team as shown in the Organogram shown in Figure 10. Additionally, the Fadama structure and GEEP/BOI structure will provide technical and operational support to the states for Results Area 2 & 3 of the Programme respectively. The Nigerian Governors Forum (NGF) Secretariat will coordinate on peer learning activities for all the participating States. The three delivery platforms at the Federal level will submit Annual Work plan and Budgets, as well as progress report to the FCSU.

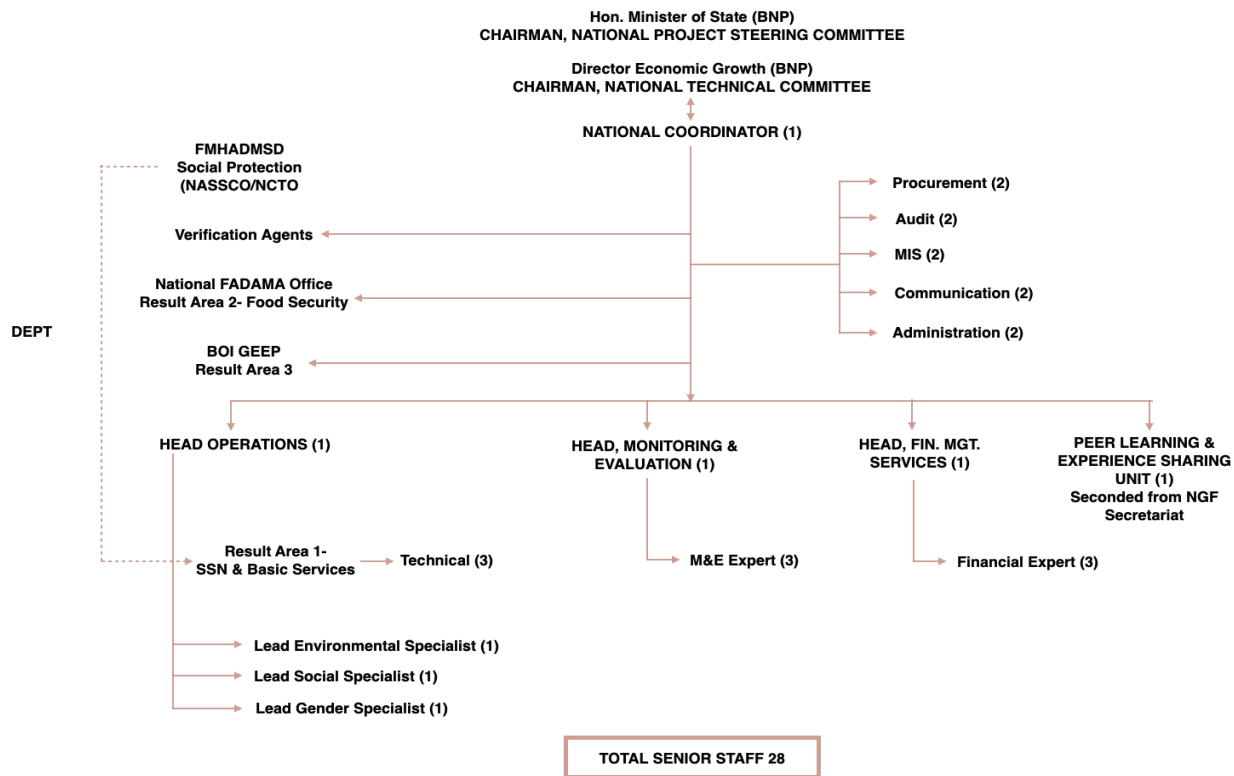


Figure 1.2: Federal Level Institutional Arrangement and Organogram for the proposed CARES PforR

34. The key existing institutions that will be involved in the Program and their roles is presented in Table 1.2.

Table 1.2: Institutions involved in the Program and their roles

Institutions	Roles in Nigeria CARES PforR
Federal Ministry of Finance	Secretariat of the Program and houses the National CARES Steering Committee (NCSC). In collaboration with the World Bank controls disbursement of funds to states.
Federal Ministry of Agriculture	The host institution of the National FADAMA program. The FADAMA program is the implementing agency of Result Area 2.
Federal Ministry of Environment	The focal ministry of environmental issues in Nigeria. They will lead in implementing environmental actions at the federal level as recommended in the PAP. They are also responsible for oversight and disclosure regarding EIA at the federal level.
Federal Ministry of Women Affairs and Social Development	The focal ministry of social issues in Nigeria. They will lead in implementing and monitoring environmental actions at the federal level as recommended in the PAP
States Ministry of Agriculture	The host institution of the FADAMA program at the state level.
States Ministry of Environment	The focal ministry of environmental issues at the state level. They will lead in implementing and monitoring of environmental actions at the state level as recommended in the PAP. They will also be responsible for overall monitoring of the implementation of the environmental actions by the SCCU and IAs. They are also responsible for oversight and disclosure regarding EIA at the federal level.
States Ministry of Gender and Social Development (or women affairs in some states)	The focal ministry of social issues at the state level. They will lead in implementing and monitoring social actions as recommended in the PAP. They will also be responsible for overall monitoring of the implementation of the social actions by the SCCU and IAs.
CSDP	Implementing agency for Result Area 1
SCTU	Implementing agency for Result Area I DLI 1.1
FADAMA	Implementing agency for Result Area 2 in the States
Bank of Industry- Government Enterprise and Empowerment Program (GEEP)	Implementing agency for Result Area 3 in at least 19 states of the federation. States Choice of Platform and Implementing Agency for each of the three DLI's under Result Area 3 is in Annex 5.

Nigeria Governor’s Forum (NGF)	The forum is the umbrella organization of all State Governors in Nigeria. It will be responsible for providing advisory support to the governors to facilitate the implementation of the program.
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35. The duration of the program is expected to be for two years. The PforR will be carried out in the thirty-six states in the country and the Federal Capital Territory. It is expected to cover all the beneficiaries and pipeline beneficiaries under the existing programs that are serving as implementing agencies in the States. For example, Result Area 2 to be implemented under the FADAMA program is expected to cover 1.2 million direct beneficiary households.

1.2 Program Boundaries and Activities

36. The PforR focuses on supporting the mitigation and recovery efforts of the states, in particular expenditures to protect livelihoods of existing and newly poor and vulnerable households, and support local economic activity, especially that of M&SMEs, and enable recovery over the next 18 months to 2 years. The PforR consists of three result areas as follows:

- a. Result area 1: This result area focuses on increased social transfers, basic services, and livelihood support to poor and vulnerable households. In particular, under this result area, the PforR will focus on:
 - i. State Social Transfers (SST) to Aged, physically challenged, chronically ill, & urban poor with the aim to enhance consumption. This will involve categorical transfer to household/individuals (Aged, Disabled, chronically ill and urban poor) selected from the State Social Register (SSR) of poor and vulnerable households and or State Beneficiaries Register (SBR). Personal data that will be generated under Social Transfers will be managed following the Data and Information Security Standard Operation Procedure (NASSCO, 2019)² pending the signing into law of the National Data Protection Bill.
 - ii. Labour Intensive Public Work (LIPW) involving immediate employment opportunities in social sectors and works in order to address the emergency constraints of loss of labour income among poor and vulnerable households as a result of COVID-19 pandemic. Beneficiaries will include unemployed youths and women age between 18-45years and with highest educational qualification of Senior Secondary Certificate of Education selected from the SSR and SBR and specially prepared Beneficiary Register. They will be enrolled in labour intensive public works in social services and infrastructure with payment of stipends. Examples of these proposed LIPW activities are improvement and beautification of public spaces including the cleaning of public areas, garbage and refuse collection and waste disposal, traffic control, rehabilitation of classroom blocks and toilets, repairing of

² NASSCO (2019) Data and Information Security Standard Operation Procedure. National Social Safety-Net Coordinating Office (NASSCO), Abuja.

clinics or primary health centres etc. Beneficiaries will receive stipends of ~~₦10,000-₦20,000~~ monthly.

- iii. Livelihood grants to economically active household members on livelihood activities with the aim to provide short livelihoods and soft skills training and one-off payments to economically active and self-employed youths and women in Nigeria. This will involve provision of trainings and grants for livelihood activities of economically active households and groups (economically active youths and women aged 18-45 years) selected from the SSR and or SBR. Livelihood activities will include household Enterprises: E.g. tailoring, barbing, fabricators, soap making, hairdressing, food services/catering, crafts and design, food millers etc. Grants will range from ~~₦20,000.00~~ to ~~₦200,000.00~~ involving one-off payment in two to three tranches in a year. Short livelihood and live skills training will last for one month. The Community and Social Development Agency (CSDA) will implement the livelihood grants.
 - iv. Community and Vulnerable Group Basic Service Delivery in infrastructure: The objective is to provide basic services in the sectors of health, education, water, and sanitation at the community level. It will employ community driven approach. It will facilitate and fund/empower communities and vulnerable groups within the communities to develop, implement and monitor social infrastructure service micro-projects (e.g., basic services-health, education, water, roads, skill centres etc.). It will focus essentially on poorest communities in each LGA in all participating State. The mode of selection will involve using State poverty map of all LGAs but focusing on poor Communities in poor LGAs. Community ranking by poverty profile will be undertaken. The Community Development planning and vulnerable group development planning cycle will start in the poorest communities and gradually expand to others. Grants will be provided after appraisal of Community Development Plans (CDP) /Group Development Plans (GDP) by the appraisal team and cleared by the CSDA Management team based on specific selection criteria (as agreed in the PIM) the criteria for eligible CDPs/GDPs will include broad-based Community/Group participation and planning, micro-project identification and preparation, and micro-projects in the Sectors of focus. Grants will range from N10m to N20m administered in 3 Tranches of 6 months' cycle.
- b. Result Area 2: This result area will focus on increasing food security and safe functioning of food supply chains for poor households. It aims to mitigate the impacts of the COVID-19 pandemic on food security of the poor and vulnerable households and facilitate the safe functioning of food supply chains. In particular, under this result area, the PforR will focus on:
- i. Supporting the poor and vulnerable to increase food production- It will support groups of small-scale farmers to access various inputs and services for crop and livestock (small ruminants) production. This will involve

distribution of improved seeds³, fertilizers and livestock inputs; seed multiplication; delivery of extension and advisory services; and provision of mechanization services. The extension and advisory services would deliver Climate Smart Agriculture practices in farm operations to increase productivity and enhance resilience to impacts of climate change and variability, reduce greenhouse gas (GHG) emissions through proper management of agricultural waste, and increase carbon sequestration primarily through soil conservation measures and efficient irrigation techniques. There will be participatory identification of the poor and vulnerable to select beneficiaries for individual activities, including women, and youth.

- ii. Provision of labour-intensive agricultural infrastructure: Under this activity, the Program would support the rehabilitation or improvement of agricultural infrastructure without constructing new irrigation infrastructure to lay the foundations for recovery of agricultural production while creating short-term jobs in rural areas. The short-term jobs would help absorb labor released to rural areas, due to the economic downturn, into productive activities in the agriculture sector. The types of infrastructure targeted for rehabilitation and improvement are small scale irrigation (existing tertiary irrigation canals, tube wells and boreholes), existing feeder roads and soil conservation measures (e.g. gabions and drainage canals). The various soil conservation measures will help reduce soil erosion, improve soil quality, increase soil water infiltration and conserve soil moisture.
- iii. Provision of agricultural assets for production and mitigation of food loss and waste: Under this activity, the Program would provide farmers with agricultural assets to increase capacity for food production and small-scale primary processing to mitigate food loss and waste. This will involve the provision of assets and equipment; and training on operation and maintenance. There will be participatory identification of the poor and vulnerable to select beneficiaries for individual activities, including women, and youth.
- iv. Upgrading wet markets involving the upgrading of water and sanitation infrastructure in existing wet markets: Under this activity, the Program would mainly support improvements in water and sanitation services in existing wet markets to reduce the risk of COVID-19 spread in the marketplaces. The support would include connecting water supply to various points in the markets (including toilets and entrances), establishment of boreholes and overhead tanks, upgrading drainage system, and provision of fumigation and water treatment services.

³ High yielding and resilient to effects of climate change, for example drought tolerance, resistance to pests and diseases, early maturity, etc. Also, use of improved seed, inorganic fertilizer, organic fertilizer etc., referred to as cropping system diversification and soil conservation are climate smart agricultural practices.

- c. Result Area 3: This result area will focus on facilitating the recovery and enhancing capabilities of MSEs. It aims to support local economies, in particular micro and small-scale enterprises (MSEs) to resume activities that may have been hampered since the start of the COVID 19 pandemic. The categories of firms to be supported are: (i) survivalists: enterprises with fewer capabilities, productive assets and negligible firm to market relationships; (ii) constrained but motivated: enterprises with productive capabilities and meaningful firm to market relationships; and (iii) growth-oriented – resilient - top-performers: enterprises with transformative capabilities and firm-employee, and buyer-supplier relationships. Under this result area, the PforR will focus on:
- i. Easing financing constraints by provision of conditional capital Grant for co-financing up to 40% of NEW loans originated by qualified financial institutions to qualified beneficiaries in COVID-19 crisis. Well-targeted conditional grants will be provided to co-finance loans that eligible⁴ MSEs received during the COVID-19.
 - ii. Provision of employment and job creation grants involving conditional grants to support operational expenditure post COVID-19. This grant should incentivize MSEs to reach pre- COVID-19 level of employment. The grant would cover operational costs including rent, utilities, private security (for FCV states) as well as acquiring solar panels to secure sustainable access to energy. This grant will not cover any due taxes or customs payments. Conditional grants to MSEs will cover up to 50% portion of its monthly operational cost including staff salaries; documented utilities; documented private security expenses as well as mini solar panel acquisition expenses.
 - iii. Enhancing of MSEs capability through provision of conditional grants to support adoption and upgrade of digital technology: This will support investments in MSEs’ IT infrastructure and supporting enhancing MSEs capability through leveraging digital technology. It will support adoption of digital payments, integration costs and IT connectivity costs to firms and support firms to become ecommerce enabled.

37. The total allocation, unit price and target for each of the DLIs for the PforR Program is shown in Table 1.3.

⁴ Covers formal and informal MSEs, two years or more. Micro enterprises will have 3-10 employees while small enterprises will have 11-100 employees. MSEs must be engaged in productive activities and must self-declare and report evidence on loss of revenues, perishable inventory, disposition of assets during January – April 2020. Formal MSEs must provide evidence of credit worthiness including no arrears or penalties to banks/MFIs for latest year before COVID 19 outbreak (March 2019-March 2020); N100 million in assets, N100 million in turnover; while informal ones will provide proof of sustainable sales, revenues for the past year before the COVID 19 outbreak.

Excluded Activities

38. The Program will exclude activities that do not meet World Bank policy on eligibility for PforR financing. Specifically, the borrower shall ensure that the Program excludes any activity, for example large scale construction works, construction of dams, primary and secondary canals which, in the opinion of the World Bank, are likely to have significant adverse impacts that are sensitive, diverse or unprecedented on the environment and/or requires significant land acquisition / resettlement of affected people, as defined in the World Bank policy on PforR financing (July 2019), as well as works, goods and consultancy contracts above the Operations Procurement Review Committee thresholds. Any land that will involve displacement/resettlement will not be eligible for community micro projects. The World Bank will support Program execution to ensure compliance with PforR policy requirements during implementation. In line with Nigeria CARES PforR activities outlined above, the exclusion of the above activities will not impact the achievements of the results under the Program. A detailed list of excluded activities is in Annex 11. These excluded activities will be included in the financing agreement.

Table 1.3: Total Allocation, Unit Price, and Target per DLI for the PforR Program

DLI	Number of States Selecting DLI	Total DLI Allocation (US\$)	Total Allocation per Results Area	Unit Price (NGN)	Unit Price in US\$ (US\$ 1 = N390)	Target per DLI (24 months)
1.1 Number of beneficiaries receiving periodic transfers	29	58,030,476	US\$ 266,564,101	400,000	1,026	56,580
1.2 Number of beneficiaries engaged and deployed into LIPW activities in social services and works	27	49,353,110		500,000	1,282	38,495
1.3 Number of beneficiaries supported with livelihood grant	29	51,521,225		400,000	1,026	50,233
1.4 Number of direct beneficiaries of completed and functional micro projects	32	107,659,290		30,000	77	1,399,571
2.1 Number of farmers utilizing agricultural inputs and services	37	102,110,881	US\$ 299,506,522	150,000	385	265,488
2.2 Number of individuals accessing improved agricultural infrastructure	31	77,556,010		300,000	769	100,823
2.3 Number of farmers utilizing agricultural assets (production and small-scale primary processing)	34	81,171,940		250,000	641	126,628
2.4 Number of existing wet markets with upgraded water and sanitation service	27	38,667,690		10,000,000	25,641	1,508
3.1. Number of firms receiving matching grants to support new loans originated after Covid-19	25	58,099,095	US\$ 168,929,377	2,233,000	5,726	10,147
3.2. Number of firms receiving operational support grants	30	75,350,592		2,233,000	5,726	13,160
3.3 Number of firms receiving	18	35,479,691		2,233,000	5,726	6,197

grants to support IT-enhancement						
		US\$ 735,000,000	US\$ 735,000,000			

1.3 Scope of the Environmental and Social Management System Assessment (ESSA)

39. The ESSA for the program examines the extent to which the Federal and State Government’s existing environmental and social management systems: operates within, an adequate legal and regulatory framework to guide environmental and social impact assessments, mitigation, management and monitoring at the PforR Program level; incorporate recognized elements of good practice in environmental and social assessment and management, including: (i) early screening of potential impacts; (ii) consideration of strategic, technical, and site alternatives (including the “no action” alternative); (iii) explicit assessment of potential induced, cumulative, and transboundary impacts; (iv) identification of measures to mitigate adverse environmental or social risks and impacts that cannot be otherwise avoided or minimized; (v) clear articulation of institutional responsibilities and resources to support implementation of plans; and (vi) responsiveness and accountability through stakeholder consultation, timely dissemination of the PforR Program information, and responsive grievance redress mechanisms; among others⁵. The ESSA thereafter defines measures to strengthen the system and recommend measures that will be integrated into the overall Program. The ESSA is undertaken to ensure consistency with six core principles and key planning elements of PforR ESSA.

40. These six core principles are:

- a. **Environment:** Promote environmental and social sustainability in the Program design; avoid, minimize, or mitigate adverse impacts, and promote informed decision-making relating to the Program’s environmental and social impacts.
- b. **Natural Habitats and Cultural Resources:** Avoid, minimize, or mitigate adverse impacts on natural habitats and physical cultural resources resulting from the Program.
- c. **Public and Worker Safety:** Protect public and worker safety against the potential risks associated with: (i) construction and/or operations of facilities or other operational practices under the Program; (ii) exposure to toxic chemicals, hazardous wastes, and other dangerous materials under the Program; and (iii) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.
- d. **Land Acquisition⁶:** Manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement, and assist the affected people in improving, or at the minimum restoring, their livelihoods and living standards.
- e. **Vulnerable Groups:** Give due consideration to the cultural appropriateness of, and equitable access to, Program benefits, giving special attention to the rights and interests of the Indigenous Peoples and to the needs or concerns of

⁵ See World Bank (2019) Bank Directive: Program-for-Results Financing

⁶ Land acquisition involving displacement/resettlement is excluded and not applicable for this operation (see excluded activities in paragraph 36 and annex 11)

- vulnerable groups.
 - f. **Social Conflict:** Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.
41. In line with the six core principles the relevant risks within the proposed Result Areas under the PforR cover environmental and social issues and include:
- a. Air, noise, water, soil and groundwater pollution, waste management, traffic, resource efficiency, biodiversity loss as a result of rehabilitation of secondary and tertiary irrigation canals; tertiary roads; agricultural warehouse; sanitary infrastructures in wet market.
 - b. Occupational Health and Safety (OHS) issues both COVID-19 and non-COVID-19
 - c. Waste management, pest management and GHG emissions as a result of increased agricultural activities and operation of SMEs.
 - d. Labour and occupational health and safety issues due to labour related actions in agriculture, during Labour Intensive Public works and SMEs activities under the program.
 - e. Risk of exclusion of vulnerable and marginalized individuals / groups/disability exclusion, elite capture, SEA/SH, Capacity to capture beneficiaries etc.
 - f. Possibility of gender-based violence (GBV) and intimate partner violence (IPV) as programs that provide cash transfer and other social support can, in some circumstances, be associated with increases in GBV and IPV. Also, the project envisions a range of rehabilitation projects, labour intensive activities and enhancement of employment in SMEs and these are activities that can increase GBV risks due to changes in labour patterns and income, creation of new hot spots for vulnerability, and changing community dynamics.

The detail of applicability of Core Environmental and Social Principles (CP) to Nigeria CARES Disbursement Linked Indicators (DLIs) is presented in Annex 2.

42. Specific environmental and social risks have been assessed and deemed to be substantial. The substantial assessment was based on the fact that there will be rehabilitation and upgrading of infrastructure and possible construction of new infrastructure during implementation of community micro projects. These activities have potential direct, indirect and cumulative negative environmental and social impacts. Although adverse environmental and social impacts are not envisaged under the circumstances, current weaknesses in the borrower's system and lack of capacity to address the environmental and social impacts may limit the PforR's ability to achieve its environmental and social operational objectives.

1.4 Approach of ESSA

43. The ESSA was prepared by Bank staff through a combination of reviews of existing program materials and available technical literature, interviews and extensive consultations with government staff, non-governmental organizations, regulatory agencies, farmers, private sector organizations and sector experts. The findings, conclusions and opinions expressed in the ESSA document are those of the Bank.

44. An environmental and social risk screening was undertaken at the concept stage (see Annex 3). The purpose of the screening was two-pronged. First, the screening was to confirm that there are no activities which meet the defined exclusion criteria included in the PforR in line with the Bank Guideline for the ESSA. Secondly, the screening established the initial scope of the ESSA. This includes identification of relevant systems under the PforR and relevant stakeholders for engagement and consultations.
45. The ESSA process was informed by the Bank Guidance on PforR Environmental and Social System Assessment (July 1, 2019). The guidance sets out core principles and planning elements used to ensure that PforR operations are designed and implemented in a manner that maximizes potential environmental and social benefits while avoiding, minimizing or mitigating environmental and social harm.
46. Following the initial screening, the system review was conducted using a two-step approach:
 - a. Identification of relevant systems that are pertinent to the ESSA was addressed in Section IV on overview of relevant government environmental and social management systems; and
 - b. assessment of borrower's environmental and social management systems for consistency with the applicable Core Principles including capacity and enforcement of certain environmental and social measures, was addressed in Section V while environmental and social recommendations was addressed in Section VI.

SECTION II: STAKEHOLDER CONSULTATION

47. This section provides a summary of the stakeholder consultation activities undertaken for the ESSA as well as future engagement activities for ESSA disclosure.
48. Despite the speed and urgency with which this project has been developed to meet the growing economic crisis and threats Due to COVID-19, extensive consultations have been carried out. The consultations were carried out in line with the World Bank’s guide on consultation during the pandemic. Different stakeholders were consulted. Those consulted include Nigeria CARES team of the participating States, potential beneficiaries of the program including farmers, previous cash transfer beneficiaries, operators of MSEs, and Nigeria CARES team from the federal government.
49. The consultations were virtual via Microsoft Team Meetings. Consultations were held for States Nigeria CARES team from the different zones and the federal team. The teams comprised of top government officials responsible for the environmental and social management in the States including Commissioners of Finance/Head of State Economic Planning, Permanent Secretaries of relevant ministries, General Managers of CSDAs, Directors of relevant state government departments, FADAMA State Coordinators, Commissioners of Ministry of Commerce and Industries and that of Agriculture, state focal persons for GEEP program, Special Advisers to state governors on Budget, Planning and Development Partner Coordination etc. The list of participants is presented in Annex 9. For the environmental and social issues, the consultation plan (see Annex 7) including questions and discussion points during the consultation were sent to participants prior to the meetings. The general consultations were held for three days, from July 14 to July 16 2020 for batches A⁷, B⁸ and C⁹ States respectively.
50. During the consultation, the detail of the PforR program was presented to the participants after which some additional questions were raised which each of the State representatives were given some time to respond. The states were thereafter requested to respond to the questions in writing and forward to the World Bank team. Following the consultation plan, the States were also requested to submit documents relating to their environmental and social systems and institutional frameworks. Some states were thereafter contacted for further information on specific issues. Summaries of the key questions/discussion points and responses from the stakeholders are presented in Table 2.1, 2.2 and 2.3 for Result Area 1,2 and 3 respectively. The full detail of the questions/discussion points and their responses per State is presented in Annex 8.

⁷ North East and North West Zones (Adamawa, Bauchi, Borno, Yobe, Gombe, Taraba, Jigawa, Kaduna, Kano, Katsina, Sokoto, Kebbi and Zamfara).

⁸ North Central and South West Zones (Benue, Kogi, Kwara, Nasarawa, Niger, Plateau, FCT, Ekiti, Lagos, Ogun, Ondo, Osun and Oyo).

⁹South East and South –South Zones (Abia, Anambra, Ebonyi, Enugu, Imo, Akwa-ibom, Bayelsa, Cross River, Delta, Edo and Rivers).

Table 2.1: Result Area 1 Key questions and discussion points and responses from the stakeholders

Result Area 1 -Key Questions/Discussion Points	Key Points from Responses of Stakeholders
Do you have specific procedure, guideline, regulation or legislation through which you ensure that vulnerable/marginalized individuals, for example women, youths, people living with disabilities etc., are not marginalized in cash transfers, basic services and livelihood support.	Virtually all the representatives from different States indicated that they have procedures to ensure that vulnerable groups are not marginalized on cash transfers. They indicated that the State Cash Transfer Units have standard procedures for selecting beneficiaries.
Do you have a procedure, guideline, regulation and legislation to ensure that elites do not take over or hijack the cash transfer, basic services, etc., to the detriment of those that need it/who are in the register?	They also indicated that the procedures would not allow for elite capture.
Do you have a procedure, regulation/ legislation for addressing gender based violence? Can you give an example of how you handled this in the past?	Some of the States indicated that they have laws while the majority to do not have laws. However virtually all the States indicated that they have Ministry of Women/Gender Affairs that help address issues related to gender violence. Few States indicated that they have response Centres that help address the issue of SEA/SH.
Do you have a framework, procedure, legislation or regulation on how grievances are redressed? Can marginalized people or those who feel that they were neglected or shortchanged have a means for reporting their grievance? Do you have a mechanism to address the issues to the satisfaction of the complainants? Can you give an example of how you handled this in the past	All the States indicated that they have GRM. However, only very few States have institutional framework and procedures for GRM. Some indicated that GRM is carried out by the Ministry of Women Affairs and Social Development in collaboration with the Ministry of Justice.

Table 2.2: Result Area 2 Key questions and discussion points and responses from the stakeholders

Result Area 1 -Key Questions/Discussion Points	Key Points from Responses of Stakeholders
Do you have an environmental law and regulation in your state?	Some of the States have put in place environmental protection law or regulation or both, while some do not have environmental laws.
Does the law and regulation contain environmental assessment requirement for projects and procedure for carrying it out?	Those with laws indicated that the laws cover environmental assessment while those without laws indicated that they adopt the federal EIA act and processes.
Do you have an EIA process in your state or do you follow that of the Federal Government?	Some of the States indicated that they have EIA process and equally follow the federal EIA process while some indicated that they only follow federal EIA process.
If you have, how do you resolved conflicts arising from the implementation of both systems?	None of the states have experienced conflict in implementing State and Federal Systems
Do you have labor law in your state? If yes, does it cover the issues of child labor? Have you dealt with child labor issues in the past?	The states do not have labor law as it is in the exclusive list and states are not allowed to legislate on it. Some states have Child’s Right Law while many do not have.
Do you have OHS standards for industries, companies and contractors operating in your state? If yes, what are the means of enforcement? Do have experience in this, give example?	Almost all the States indicated that they do not have OHS standards and guidelines for companies and contractors.
Has the state domiciled or have a child’s right law?	Some states indicated that they have Child’s Right Law while many indicated that do not have.

Table 2.3: Result Area 3 Key questions and discussion points and responses from the stakeholders

Result Area 1 -Key Questions/Discussion Points	Key Points from Responses of Stakeholders
Do you have a law and policy on Gender?	Virtually all the States indicated that they did not have a gender law while some indicated that they have policy
Do you have a small and medium scale enterprises agency in the state?	Many of the States have SME agencies although some States reported that they did not have SME agency.
Do you have a procedure to ensure that women are not marginalized in allocation of resources in the agency?	Many of the States indicated that they have a procedure to ensure that women are not marginalized.
Do you have environmental standards and OHS procedures for Micro and Small Enterprises?	Virtually all the States do not have OHS procedures for MSE.
Do you have capacity to enforce environmental and social regulations and laws for MSEs?	Some States indicated that they have capacity to enforce environmental regulations and laws for MSEs.

51. Consultations were also held for farmers, beneficiaries from FADAMA and non-beneficiaries on the 4th of August 2020, so as to find out their experience from the project and other issues regarding agriculture in the States. The farmers were asked questions relating to their experience regarding GRM and environmental and social assessment in FADAMA. They were also asked questions relating to GBV and sexual harassment, pesticide use and waste management experiences from FADAMA. The farmers made positive responses. Although many of the farmers experienced delays in the disbursement of funds, they were of the opinion that the program was a good one in terms of E&S management. They indicated that women were not discriminated against and that at least 30% of beneficiaries are women and even higher in some States. None of the female farmers interviewed have experienced or heard of GBV or sexual harassment within FADAMA project. They also indicated that environmental assessment and gender mainstreaming was part of prequalification for receiving funding for the project. The farmers also indicated that they received training on safe handling and use of pesticides from the FADAMA secretariat. The details of the questions and responses from farmers in each of the participating States are in Annex 10.
52. Further consultation was held virtually where the draft ESSA report was presented to the Nigeria CARES team of the participating states. The consultation was held on September 4 2020. The participants from the different states commended the effort of the bank in producing the report. They accepted the recommendations made and the action plan. The States that did not submit all the necessary documents (relevant laws, regulations and policies) promised to submit for full assessment. The output/response of the participants during the consultation is presented in Annex 12.
53. Also, some operators/owners of MSEs who are potential beneficiaries under Result Area 3 were also consulted. The operators were consulted via telephone because of the inability of the operators to connect via any internet platform probably due to limited internet access. Through phone conversation information about the Program was relayed to the MSEs operators while information regarding their OHS practices, environmental issues including waste management and some social issues were obtained from them. The summary of the highlights of discussion with each of the MSE operators consulted is presented in annex 13 while the list of those consulted are in annex 14.
54. In addition, some previous beneficiaries of the government cash transfer program were also consulted.

Disclosure:

55. The final ESSA report will be publicly disclosed on the World Bank external website and in-country portals and at relevant government Ministries, Departments and Agencies (MDAs) at Federal and State levels.

SECTION III: DESCRIPTION OF EXPECTED PROGRAM ENVIRONMENTAL AND SOCIAL EFFECTS

3.1 Overview of Program Risks and Benefits

56. The PforR is multi-pronged program which was prompted by the need to cushion the effect of the economic crisis caused by COVID-19 pandemic and facilitate the recovery of impacted people. Given its proposed activities and targets, the Program has the capacity and potential to generate positive outcomes and benefits especially social benefits that will result from increased social transfers, basic services, and livelihood support to poor and vulnerable households; increased food production, food security and safe functioning of food supply chains; recovery and enhanced financing of MSEs. The overall objective is to protect livelihoods and ensure food security of poor and vulnerable families and facilitate recovery of local economic activity in all participating states across Nigeria.
57. There are some direct physical works involved in the Program mainly focused on rehabilitation of existing agricultural infrastructure and also involvement of communities in the development and implementation of their micro projects, and upgrading of existing wet markets thus, environmental and social risks, some of which are indirect, direct and cumulative, are deemed to be substantial. The detail of the range of key environmental and social risks and benefits associated with specific DLI in Nigeria CARES PforR is presented in Annex 4.

3.2 Environmental Benefits

58. The PforR program will significantly deliver some environmental benefits There could be climate co-benefits associated with use of improved agricultural technology and climate smart agriculture practices (use of improved seed, inorganic fertilizer, organic fertilizer etc., referred to as cropping system diversification) and soil conservation associated with DLI 2.1 and DLI 2.2 and use of improved technologies in MSEs especially IT improvement that will be part of DLI 3.3.
59. Environmental benefits that will accrue from the Program include clean environment due to improved water and sanitation services and waste management due to implementation of micro projects (DLI 1.4). There will also be benefits of clean environment in wet markets due to effective water and sanitation services and waste management as a result of the upgraded water and sanitation infrastructure in existing wet markets associated with DLI 2.4. These projects will ultimately improve the environment, health and safety condition of the communities.

3.3 Environmental Risks

60. The Program is expected to have direct and indirect effect on the physical environment. **Under Result Area 1**, activities for achievement of DLI 1.2 will indirectly impact on physical environment as the labor intensive public work (LIPW) that women and youths will be engaged in and equally benefit from, will lead to air pollution, water pollution, soil contamination, hazardous materials from waste disposal, among others. Women and youths involved in LIPW will be exposed to the dangers of these environment hazards.

61. Also, activities associated with DLI 1.4 which include implementation of community micro-projects (e.g. basic services-health, education, water, roads, skill centers etc.) will lead to air pollution, ground water pollution, loss of biodiversity, noise, water pollution and waste generation.
62. **Under Result Area 2**, improper use of agricultural inputs, for example, pesticides and fertilizer, that will be distributed to farmers in order to achieve DLI 2.1, can cause air pollution, soil and surface water and ground water pollution. Furthermore, potential environmental risks associated with DLI 2.2 include air, noise, water, soil and groundwater pollution, waste problem, biodiversity loss as a result of rehabilitation of agricultural infrastructure including tertiary irrigation canals; and tertiary roads; etc. Also, potential environmental risks associated with DLI 2.4 include air, noise, water, pollution, waste issues, as a result of physical works associated with upgrading of sanitary infrastructures in wet market. In addition, achieving DLI 2.3 is expected to result in increased waste generation and environmental pollution due to enhanced agricultural processing activities. The negative impacts especially as a result of activities for the achievement of DLI 2.1-2.4 could be cumulative (due to pre-existing environmental pollutants) and would further enhance deterioration in soil and ground water quality, increased air pollution, increased waste problem and overall environmental deterioration with its consequences on human health and the economy. Activities implemented to achieve some of the DLIs will lead to carbon emission. Improved agricultural infrastructure (DLI 2.2) will lead to GHG emissions as a result of increased agricultural activities.
63. Activities associated with Result Area 3 (DLI 3.3) involves conditional grants to support IT enhancement. Given the fact that new devices will be deployed, and old/unserviceable ones become discarded, these computers, tablets and digital devices will constitute e-waste and become serious nuisance to the environment.
64. Also, Increased operations of the MSEs due to operational support grant (DLI 3.2 may lead to increased carbon emission (for MSEs that burn a lot of fossil fuels), air pollution and noise.
65. Although some activities implemented in order to achieve some DLIs will lead to GHG emission and thus climate change, the Program will equally be affected by risks associated with climate change. Climate change will limit the realization of Result Area 2 objectives of increased food production and accessibility of food. Regarding the impact of climate change on crop yield in Africa¹⁰ report that crop yields are projected to decrease under future climate conditions, while recent research suggests that yields have already been impacted. Farmers, with their excellent perception of climate change impacts on crops and animals, perceived climate change impacts to include delayed onset of rains, early cessation of rainy season, and reduction in total annual rainfall¹¹. Ayanlade et al. (2017) observed that farmers indicated a negative impact of climate change on both crop and animal with 62.8%, 52.2% and 49.7% of the farmers observing higher impact in maize, yam, and rice respectively.

¹⁰ Ray DK, West PC, Clark M, Gerber JS, Prishchepov AV, Chatterjee S (2019) Climate change has likely already affected global food production. PLoS ONE 14(5): e0217148. <https://doi.org/10.1371/journal.pone.0217148>

¹¹ Oloukoi, G., Fasona, M., Olorunfemi, F., Adedayo, V., and Elias, P., 2014. A gender analysis of perceived climate change trends and ecosystem-based adaptation in the Nigeria wooded savannah, Agenda: Empowering Women for Gender Equity, 28:16-33. Doi:10.1080/1013095.2014.949477.

66. Regarding mitigation of these environmental risks, an assessment of the borrowers' environmental systems to be able to mitigate these risks was done in Section IV and gaps and gap filling measures identified.

3.4 Social Benefits

67. The Program being an intervention program to facilitate recovery from economic crisis as a result of COVID-19 pandemic, has a lot of social benefits that will result from the achievement of the DLIs. Figure 3.1 shows the impact pathways for reduction of risks (economic shock, exposure and vulnerability) to households due to COVID-19.

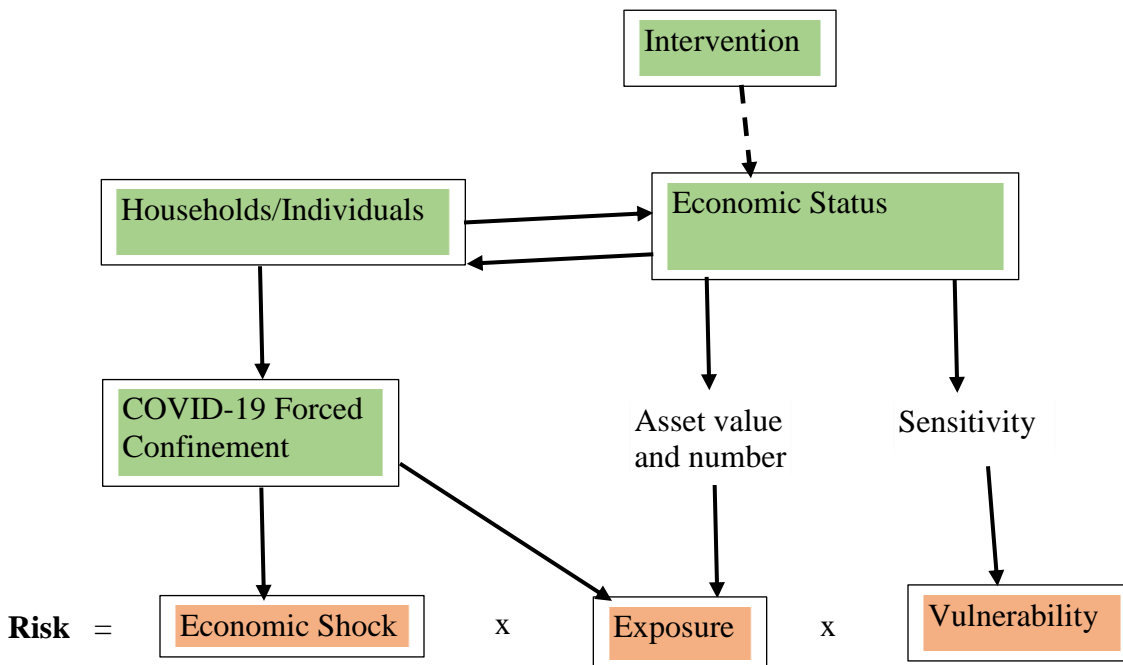


Figure 3.1: Impact path ways for reduction of risks (economic shock, exposure and vulnerability) to households due to COVID-19

Source: Adapted¹² and modified.

Note that intervention/risk reduction activities in Result Areas 1-2 for household/individuals can reduce economic shock and potential effects on households (due to the social benefits) by affecting exposure and vulnerability.

68. The implementation of activities related to DLI 1.1, that is social transfers to aged people, chronically ill, urban poor, widows and new poor (Due to COVID-19) is expected to facilitate poverty reduction (some people will exit from poverty especially the new poor), enhanced nutrition outcomes and food security. It will also result in enhanced longevity given available funds to treat chronically ill people who will receive the transfers. The payment system which

¹² Kundzewicz, Z. W., Kanae, S., Seneviratne, S. I., et al (2014) Flood risk and climate change: global and regional perspectives. Hydrological Science Journal 59(1):1–28. <http://dx.doi.org/10.1080/02626667.2013.857411>

is through payment service providers (PSP) will enhance financial inclusion in Nigeria with all its associated benefits.

69. There will be direct and indirect social benefits related to DLI 1.2. Direct social benefits include reduced unemployment among youth and women, enhanced income and reduction in poverty, reduced vulnerability to shocks (health shock, shock due to lack of food, etc.). Indirect benefits include reduced road traffic accidents, and reduced school dropout rates and enhanced educational outcomes with repair of classroom blocks. Social benefits related to DLI 1.3 which is expected to be generated include enhanced livelihoods and welfare of the households/individuals, (households would be returned to even better condition pre COVID-19). Note that besides grants, capacity of individuals will be built to facilitate their livelihood activities.
70. The execution of micro-projects for the achievement of DLI 1.4 is expected to generate some social benefits which include enhanced income for the people, reduced incidence of disease outbreaks, access to clean and portable water, access to roads, enhanced skill acquisition and employment generation, reduced poverty and vulnerability to shocks (for example health shocks), enhanced access to education, as a result of the micro-projects.
71. The implementation of the activities of Result Area 2 (DLI 2.1, DLI 2.2 and DLI 2.3) is expected to result in increased food production, enhanced value addition to agricultural commodities, enhanced income for the farmers, food security, reduced poverty, acquisition of assets, and reduced vulnerability of the households and individuals to shocks. It will enhance the recovery of households from the economic crisis due to COVID-19. In addition, upgrading of water and sanitation services at wet market for the achievement of DLI 2.4 is expected to generate health related benefits (reduced disease especially diarrhea, and related diseases) and safety of people using the wet markets due to effective water and sanitation services at the wet markets.
72. The issuance of conditional capital grant to MSEs to support new - post-COVID19 loans for the achievement of DLI3.1 is expected to lead to increased liquidity (as the capital grants will free-up cash that would have been used for loan repayment) and enhanced operation and thus, increased income for the MSEs, reduced business risk and enhanced/boosted ability to invest in business growth and development. The economy of the country will also be enhanced with a thriving MSE sector.
73. The conditional operational support grants to MSEs for the achievement of DLI 3.2 is expected to lead to increased employment, reduced underemployment. Enhanced employment will boost spending and consumption and thus boost the entire economy. It will enhance the operation and performance of the firms and thus enhance their income. This will in turn translate into more employment, reduced poverty and economic growth. Also, the achievement of DLI3.3 is also expected to enhance the income for the firms due to enhanced operations and business continuity as a result of deployment of IT services.

3.5 Social Risk

74. Some social risks are associated with the Results Areas and the DLI. Indirect potential risks due to the implementation of the activities to achieve DLI 1.3 include the fact that the beneficiaries (households/individuals) can misuse or divert the grants from livelihood

activities and engage in negative activities that may be counterproductive, for example, funeral ceremonies, marriage ceremonies (marrying new wives) and naming ceremonies. These will indirectly lead to negative consequences and impacts on their livelihoods. This will make them to become more vulnerable to crisis and disaster. Although there are procedures for selecting beneficiaries of benefit and cash transfer (DLI-1.1), there is a possibility of indirect capture by elites who may divert the transfers (without due process) to their favored vulnerable and poor people. Besides, a lack of understanding of selection and grievance complaint processes by beneficiaries and non-beneficiaries could create tension and may result in conflict (for example civil demonstrations).

75. Directly, there could be conflicts which may result from perceived injustice in the recruitment and treatment of workers under the Labor-Intensive Public Workfare (LIPW) (DLI 1.2). Indirectly, youth and women involved in LIPW could be exposed to road traffic accidents (for those involved in traffic control), health impacts due to exposure to waste especially toxic and hospital wastes, accidents and injuries during rehabilitation work, exposure to COVID-19 due to increased contact with other people, etc. There is also a possibility of sexual exploitation and abuse and, / sexual harassment both during recruitment of workers and at the workplace. Furthermore, there could be conflicts within the communities regarding planning and implementation of the social infrastructures and micro projects (DLI 1.4), elite capture and discrimination against the very vulnerable persons in the communities. Besides, there could also be risks associated with the use of child labor and coercion in land donation for micro projects.
76. Although, the distribution of agricultural inputs to farmers (DLI 2.1) could lead to increased food production, it could equally result in increased poverty and vulnerability, especially if vulnerable groups are discriminated against in the distribution of agricultural inputs. There is also possibility of sexual exploitation and abuse/sexual harassment during the distribution of agricultural inputs. There is a possibility of use of child labor in the rehabilitation of existing tertiary irrigation canals; and tertiary/ feeder roads (DLI 2.2). Also, workers and laborers involved in upgrading of water and sanitary infrastructures at existing wet markets (DLI 2.4) may also be exposed to OHS risks. Also, there could be risks associated with the use of child labor in upgrading of water and sanitary facilities at these wet markets.
77. Activities based on the conditional operational support grant (DLI 3.2), for example re-engaging previously employed individuals and employment of unemployed individuals could be exposed to sexual exploitation and abuse / sexual harassment.
78. Another key issue that may indirectly pose a huge risk to the achievement of the PDO element of Result Area 2, which is increased production and accessibility of food, is the problem of herders and farmers conflict, banditry and terrorism/armed insurgency especially in North East and North West Nigeria. This will not only affect the ability of the farmers to make use of inputs distributed to them but may lead to the loss of planted crops and planting season.
79. One other contextual risk that may affect the program is COVID-19 pandemic. Beneficiaries may be exposed to the pandemic especially those participating on LIPW and micro-projects.

SECTION IV: OVERVIEW OF RELEVANT GOVERNMENT ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEMS

4.1 Description of policy and legal framework

80. The government of Nigeria (GON) has a number of policies, instruments and laws which support environmental and social management and environmental and social impact assessment processes. There are a number of sectoral policies which provide directives to integrate environmental and social considerations in the decision-making process to avoid or minimize impacts associated with program implementation. This section summarizes the policy, regulatory, institutional and legal frameworks for environmental management Nigeria. The World Bank safeguard policies, and international environmental agreements and conventions were also presented.

4.1.1 Environmental Policy, Regulatory and Institutional Frameworks

81. This sub-section describes the GON's environmental management systems in relation to the core principles incorporated into the Bank Policy Program for Results Financing:

- (i) general principles of environmental and social impact assessment and management;
- (ii) mitigation of adverse impacts on natural habitats and physical cultural resources; and,
- (iii) protection of public health worker safety.

National Policy on the Environment 2016:

82. The goal of the National Policy on the Environment is to 'ensure environmental protection and the conservation of natural resources for sustainable development'. This goal is meant to be achieved by the following strategic objectives:

- a. securing a quality of environment adequate for good health and wellbeing;
- b. promoting sustainable use of natural resources and the restoration and maintenance of the biological diversity of ecosystems;
- c. promoting an understanding of the essential linkages between the environment, social and economic development issues;
- d. encouraging individual and community participation in environmental improvement initiatives;
- e. raising public awareness and engendering a national culture of environmental preservation; and
- f. building partnership among all stakeholders, including government at all levels, international institutions and governments, non-governmental agencies and communities on environmental matters.

National Forestry Policy (2006)

83. Nigeria's National Forestry Policy was approved in 2006. The legislation to support this Policy known as the National Forestry Act has not been passed into law. Once passed, the National Forestry Act will be administered by the Federal Department of Forestry which is a parastatal agency of the FMEnv. The overall objective of the national forest policy is to achieve sustainable forest management that would ensure sustainable increases in the economic, social and environmental benefits from forests and trees for the present and future

generation including the poor and the vulnerable groups. Specifically, the objectives include the need to:

- increase, maintain and enhance the national forest estate through sound forest management practices;
- address the underlying causes of deforestation, desertification including lack of policy support, market distortions, weak regulations and rural poverty;
- promote and regulate private sector involvement in forestry development, and to create a more positive investment climate in the sector;
- capitalize on the economic, social and environmental opportunities in forestry without undermining the resource base’
- encourage forest dependent people, farmers and local communities to improve their livelihood through new approaches to forestry;
- ensure the survival of forest biodiversity and to balance this with the pressing development needs of the country;
- rehabilitate and conserve key watershed forests;
- promote and maintain the greening of the urban environment, and meet the increasing demand for forest products by urban centres;
- ensure that improved tenure to land and tree acts as an incentive for individuals, communities and women in particular to invest in forestry;
- help private owners and communities to reserve land for forestry;
- build capacity and systems for state and local government to engage actively in forest resources management and development;
- apply an effective regulatory system to safeguard public interests under private sector forest management agreements to ensure adequate legal provisions for tenure in order to encourage long-term investment;
- develop partnerships or management agreement with local communities that improve forest management and alleviate poverty;
- strengthen and make best use of the capacity and reach of NGOs and CBOs in facilitating forest development;
- develop and promote responsive, affordable, well-informed and decentralized forestry advisory services to farmers, communities and the forest industry;
- develop and support demand driven, well-coordinated forestry research and training institutions and programmes; and
- develop a forest sector programme that translates forest policy into action in a way that complements programmes in related sectors.

84. There are three categories of protected areas in Nigeria established to protect flora and fauna. These categories are the National Parks, Game Reserves and Forest Reserves. At the national level, the mandate for wildlife conservation and protected areas management is the responsibility of the National Parks Service, an agency within the FMENV. There are seven national parks spread across the country. These parks receive the highest level of protection in accordance with the National Parks Service Act of 1999, No 46. A variety of game reserves are managed by the states in which they reside in an effort to preserve wildlife species. States also manage innumerable forest reserves with the intention of preserving trees and other plant species along with associated wildlife. Many forests are highly degraded due to

unsustainable extraction of timber and non-timber forest products, namely, fuelwood, economically important plant species, bushmeat and other resources.

Environmental Impact Assessment Act (EIA) N0. 86 of 1992

85. The Act, which is a direct response to the outcome of the United Nations Conference on Environment and Development (UNCED) in Rio in 1992, outlines the goals and objective of an EIA, the minimum content of an EIA and a list of activities that are not permitted to go ahead until FEPA, now Federal Ministry of Environment has been consulted and has given its approval. The main aim of the Act is to ensure environmentally sound and sustainable development projects. The Act makes it mandatory for an EIA to be carried out for certain types of projects comprising various industrial, mining and petroleum activities. It categorized projects to indicate the level of analysis required. Category 1 projects indicates an expectation of significant environmental impacts and need to undertake a full EIA with a comprehensive report. These are project in environmentally sensitive areas, for example, coral reefs, mangrove swamps, tropical rainforests, areas with erosion soils, natural conservation areas etc. Category 2 indicates that a proposal may have impacts of a lesser magnitude that can be more readily mitigated. Here, some level of analysis is necessary depending on the type of impacts. This involves projects in agriculture and rural development, industry and infrastructure etc. Category 3 indicates that no adverse impacts are expected, and that no EIA is needed, for example, nutrition programs, education programs, etc. The EIA procedural guideline in Nigeria involves project proposal, initial environmental examination, screening, scoping, EIA study, review, decision making, monitoring and audit. Table 2.1 summarizes the other existing regulations applicable to environmental protection while Table 2.2 presents a list of proposed legislations.

Nigerian Environmental Management Act

86. This act was drafted following the amalgamation of the Federal Environmental Protection Agency into the Ministry of Environment but was never ratified. It repeals the 1988 Federal Environmental Protection Agency Decree N0.58 (amended N0.59 and N0.14) and establishes the FEPA as part of the Ministry with the Minister of Environment having primary responsibility for its implementation. It does not repeal any other environmentally related legislation. As well as the general environmental provisions, which include environmental sanitation and occupational health, it specifies the powers of authorized officers, penalties and fines. The Act gives the Minister the authority to grant environmental permits for prescribed activities which includes sand mining but not any other mining activities.

National Environmental Standards and Regulations Enforcement Agency (NESREA) (Establishment Act, 2007)

87. The main aim of this act is to establish the National Environmental Standards and Regulations Enforcement Agency (NESREA). The agency has responsibility for the protection and development of the environment, biodiversity conservation and sustainable development of Nigeria's natural resources in general and environmental technology, including coordination and liaison with relevant stakeholders within and outside Nigeria on matters of enforcement of environmental standards, regulations, rules, laws, policies and guidelines. Its key role is to enforce compliance with laws, guidelines, policies and standards

on environmental matters including provisions of international agreements, protocols, conventions and treaties on the environment, namely climate change, biodiversity, conservation, desertification, forestry, oil and gas, chemicals, hazardous wastes, ozone depletion, marine and wild life, pollution, sanitation and such other environmental agreements as may from time to time come into force; enforce compliance with policies, standards, legislation and guidelines on water quality, environmental health and sanitation, including pollution abatement, among others.

National Environmental Protection (Pollution Abatement in Industries and Facilities Generating Wastes) Regulation, 1991 S. 1. No 9.

88. The regulation imposes restrictions on the release of toxic substance to the environment. It also indicates that the collection, treatment, transportation and final disposal of waste shall be the responsibility of the industry or facility generating the waste. The regulations require industries and facilities including mining sector to monitor pollution to ensure control. Other provisions of the regulation include permit by industries for storage and transportation of harmful toxic wastes; strategies for waste reduction; disposal of solid wastes in environmentally safe manner; and protection of workers. Penalties for contravention are also spelt out in the regulation.

National Environmental Protection (Management of Solid and Hazardous Wastes) Regulations, 1991 S. I. No. 15.

89. The regulations make provisions for the handling and management of solid hazardous waste as well as define the objectives of hazardous waste management, the functions of appropriate government agencies and the obligations of industries. The regulations highlighted dangerous waste lists and guidance on the management of spills and discharges into the environment. The regulations also define the requirements of ground water protection, surface impoundment, land treatment, waste piles, etc. the hazardous substance tracking program with a comprehensive list of acutely hazardous chemical products and dangerous waste constituent are also provided in the regulations as well as the requirements and procedure for inspection, enforcement and penalty.

National Environmental Protection (Effluent Limitation) Regulations, 1991 S.I. No8.

90. These regulations make it mandatory for every industry to install anti-pollution equipment for the detoxification of industrial effluent chemicals discharge and also make provision for further effluent treatment. The regulations also prescribe maximum limit of effluent parameters allowed for discharged and spell out penalties for contravention.

National Environmental Health Practice Regulation 2016:

91. The regulation was enacted as a supplement to the Environmental Health Officers Registration Etc. Act, 2002. The regulations provides guideline for the enforcement of the regulatory powers in the Act; prevent and abate nuisance, protect, preserve and promote the physical and social well-being of the public; prevent and control the incidence of communicable diseases through environmental health intervention; reduce environmental hazards to health, safeguard and maintain aesthetic value of the environment; promote the general welfare of the public by regulating the sanitary construction and sanitation of all premises; and regulate private and

public sector collaboration for purposes of maintaining adequate sanitation and promotion of public health and safety.

92. To enhance environmental protection in Nigeria, some statutory provisions have been put in place: Table 3.1 the regulations governing environmental management in Nigeria which were instituted prior to the establishment of NESREA. With the establishment of NESREA, the agency has developed thirty-three environmental regulations for environmental management. The regulations cover various environmental issues. According to NESREA, these regulations are to ensure that our national development agenda is not at variance with the carrying capacity of our fragile environment. With the recent outbreak of corona virus pandemic (COVID-19), the agency developed guidelines for handling of infections waste within the context of corona virus (COVID-19) and guidelines for handling chemicals used for disinfecting surfaces against coronavirus (COVID-19). Details of the regulations and guidelines can be found in NESREA website.

Table 4.1: Existing National Environmental Protection Regulations

Regulations	Year	Provisions
Workmen Compensation Act	1987	Occupational health and safety
Harmful Wastes (Special Criminal Provisions etc.) Decree No. 42	1988	Provides the legal framework for the effective control of the disposal of toxic and hazardous waste into any environment within the confines of Nigeria
National Environmental Protection (Effluent Limitation) Régulation	1991	The regulation makes it mandatory for industrial facilities to install anti-pollution equipment, makes provision for effluent treatment and prescribes a maximum limit of effluent parameters allowed.
National Environmental Protection (Pollution and Abatement in Industries in Facilities Producing Waste) Regulations	1991	Imposes restrictions on the release of toxic substances and stipulates requirements for monitoring of pollution. It also makes it mandatory for existing industries and facilities to conduct periodic environmental audits.
National Environmental Protection (Management of Solid and Hazardous Wastes) Regulations.	1991	Regulates the collections, treatment and disposal of solid and hazardous wastes from municipal and industrial sources.
National Guideline and Standard for Environmental Pollution Control	1991	The regulations provide guidelines for management of pollution control measures.
Environmental Impact Assessment Act (Decree No. 86).	1992	The decree makes it mandatory for an EIA to be carried out prior to any industrial project development
Urban and Regional Planning Decree No 88	1992	Planned development of urban areas (to include and manage waste sites)

93. Other provisions are:

- Environmental Impact Assessment Procedural Guidelines 1995; Guidelines and

- Standards for Environmental Pollution Control in Nigeria 1991;
- Environmental Impact Assessment (Amendments) Act 1999;
- National Guidelines and Standards for Water Quality 1999
- National Guidelines on Environmental Management Systems (EMS) 1999
- National Guidelines on Environmental Audit in Nigeria 1999

Description of Environmental Institutional Framework

The main institutions with key responsibilities for environmental and social management are as follows:

Federal Ministry of Environment

94. The FME was created in 1999 and replaced the Federal Environmental Protection Agency. At the time it also incorporated nine Departments from other Ministries. The mandate of the new Ministry is to co-ordinate environmental protection and natural resources conservation for sustainable development and specifically to:
- a. Secure a quality of environment adequate for good health and well-being;
 - b. Promote the sustainable use of natural resources;
 - c. Restore and maintain the ecosystem and ecological processes and preserve biodiversity;
 - d. Raise public awareness and promote understanding of linkages of environment; and
 - e. Co-operate with government bodies and other countries and international organisations on environmental matters.

The National Environmental Standards and Regulations Enforcement Agency (NESREA)

95. NESREA is an Agency of the Ministry of Environment and is charged with the responsibility of enforcing environmental laws, regulations and standard in deterring people, industries and organization from polluting and degrading the environment. NESREA has the responsibility for the protection and development of the environment, biodiversity conservation and sustainable development of Nigeria's natural resources in general and environmental technology including coordination, and liaison with, relevant stakeholders within and outside Nigeria on matters of enforcement of environmental standards, regulations, rules, laws, policies and guidelines.

Some functions of the Agency, amongst others include to:

- enforce compliance with laws, guidelines, policies and standards on environmental matters;
- coordinate and liaise with, stakeholders, within and outside Nigeria on matters of environmental standards, regulations and enforcement;
- enforce compliance with the provisions of international agreements, protocols, conventions and treaties on the environment including climate change, biodiversity conservation, desertification, forestry, oil and gas, chemicals, hazardous wastes, ozone depletion, marine and wild life, pollution, sanitation and such other environmental agreements as may from time to time come into force;
- enforce compliance with policies, standards, legislation and guidelines on water quality, Environmental Health and Sanitation, including pollution abatement;

- enforce compliance with guidelines, and legislation on sustainable management of the ecosystem, biodiversity conservation and the development of Nigeria’s natural resources;
 - enforce compliance with any legislation on sound chemical management, safe use of pesticides and disposal of spent packages thereof;
 - enforce compliance with regulations on the importation, exportation, production, distribution, storage, sale, use, handling and disposal of hazardous chemicals and waste, other than in the oil and gas sector;
 - enforce through compliance monitoring, the environmental regulations and standards on noise, air, land, seas, oceans and other water bodies other than in the oil and gas sector;
 - ensure that environmental projects funded by donor organizations and external support agencies adhere to regulations in environmental safety and protection;
 - conduct environmental audit and establish data bank on regulatory and enforcement mechanisms of environmental standards other than in the oil and gas sector;
 - create public awareness and provide environmental education on sustainable environmental management, promote private sector compliance with environmental regulations other than in the oil and gas sector and publish general scientific or other data resulting from the performance of its functions; and
 - carry out such activities as are necessary or expedient for the performance of its functions.
- The Agency has powers to:
- prohibit processes and use of equipment or technology that undermine environmental quality;
 - conduct field follow-up of compliance with set standards and take procedures prescribed by law against any violator;
 - subject to the provision of the Constitution of the Federal Republic of Nigeria, 1999, and in collaboration with relevant judicial authorities establish mobile courts to expeditiously dispense cases of violation of environmental regulation.

4.1.2 Social Policy, Regulatory and Institutional Frameworks

Labor Laws and Labor Protection

96. Labor law is well developed in Nigeria; with laws defining the rights and obligations of labor and regulating most aspects of the relationship between the employer and labor including contracts, wages and hours, discrimination, terminations, lay-offs, safety, pregnant workers, reasonable accommodations and others. National Labor and Employment law is largely based on the following statutes:
- the Labor Act of 2004;
 - the Trade Union Amended Act, 2005;
 - the Employees Compensation Act, 2010;
 - the Factories Act, 2004;
 - the Pensions Act, 2004; and
 - The Trade Disputes Act, 2004.

The Labour Act of 2004

97. The Labor Act 2004 was enacted to replace the Labor Code Act and to consolidate the law relating to labor. Part 1 of the Act provides for the protection of wages, contracts of employment and terms and conditions of employment; part 2 provides for recruiting; part 3 provides for special classes of worker and miscellaneous special provisions; while part 4 is

supplemental. The Act in the different parts made a lot of provisions to ensure that the interest of the worker is protected. For example, under protection of wages the Act made provisions to ensure that the worker's dignity regarding wages is maintained. For example, the Act provides in part 1 No 2 that no employer shall impose in any contract for the employment of any worker any terms as to the place at which, or the manner in which, or the person with whom any wages paid to the worker are to be expended; and every contract between an employer and a worker containing any such terms shall be illegal, null and void.

The Trade Union (Amended) Act 2005

98. The Trade Union Act (the Principal Act) makes provisions with respect to the formation, registration and organization of trade unions, and the Federation of Trade Unions. As provided in the Act, "trade union" means any combination of workers or employers, whether temporary or permanent, the purpose of which is to regulate the terms and conditions of employment of workers, whether the combination in question would or would not, apart from this Act, be an unlawful combination by reason of any of its purposes being in restraint of trade, and whether its purposes do or do not include the provision of benefits for its members. The Act prohibits unregistered unions from function. The Principal Act was amended in 2005 to make some more provisions especially as to reduce conflicts between government and trade unions and to protect workers. For example, regarding membership of trade unions, the amended Act provides in Section 12 (4) that membership of trade union is voluntary. It states that "notwithstanding anything to the contrary in this Act, membership of a trade union by employees shall be voluntary and no employee shall be forced to join any trade union or be victimized for refusing to join or remain a member". The amended Act, to ensure the funding of trade unions, empowers employers to make deduction from the wages of every worker who is a member of any of the trade unions for the purpose of paying contributions to the trade union so registered; and remit such deductions to the registered office of the trade union within a reasonable period or such period as may be prescribed from time to time by the Registrar.

The Employees Compensation Act 2010

104. The Employee's Compensation Act, 2010 is a social security/welfare scheme that provides comprehensive compensation to employees who suffer from occupational diseases or sustain injuries arising from accidents at workplace or in the course of employment. The basis or justification for 'compensation' is the employer's duty of care. The objectives of the Act are as follows:

- (a) provide for an open and fair system of guaranteed and adequate compensation for all employees or their dependents for any death, injury, disease or disability arising out of or in the course of employment;
- (b) provide rehabilitation to employees with work-related disabilities as provided in this Act;
- (c) establish and maintain a solvent compensation fund managed in the interest of employees and employers;
- (d) provide for fair and adequate assessments for employers;
- (e) provide an appeal procedure that is simple, fair and accessible, with minimal delays; and
- (f) combine efforts and resources of relevant stakeholders for the prevention of workplace disabilities, including the enforcement of occupational safety and health standards.

The Factories Act 2004

99. An Act to provides for the registration, etc., of factories; provides for factory workers and a wider spectrum of workers and other professionals exposed to occupational hazards, but for whom no adequate provisions had been formerly made; and provides for adequate provisions regarding the safety of workers to which the Act applies and to impose penalties for any breach of its provisions. The Act in sections 2(1) and 3(1) provides that any premises used as a factory must be registered as such. In addition to other provisions the Act provides for cleanliness of factories, avoidance of overcrowding which could cause risk or injury to the health of workers, adequate ventilation in workrooms, lighting of workrooms, provision of sanitary conveniences, among others. These are aimed for the protection of workers and others in the factory.

The Pension Reform Act 2004

105. The Act established the contributory pension scheme (the Scheme) for employees in the public and private sectors in Nigeria; and the National Pension Commission (NPC), in order to facilitate the payment of retirement benefits to deserving employees. As provided in the Act, the objectives of the Scheme are to:

- (a) ensure that every person who worked in either the Public Service of the Federation, Federal Capital Territory or Private Sector receives his retirement benefits as and when due:
- (b) assist improvident individuals by ensuring that they save in order to cater for their livelihood during old age: and
- (c) establish a uniform set of rules, regulations and standards for the administration and payments of retirement benefits for the Public Service of the Federation, Federal Capital Territory and the Private Sector. On the other hand, the principal object of the Commission, as provided in the Act, shall be to regulate, supervise and ensure the effective administration of pension matters in Nigeria.

The Trade Disputes Act, 2004

100. The Act makes provisions for the settlement of trade disputes and other matters ancillary thereto. The Act established the National Industrial Court. The Act provides for procedure of settling dispute before it is reported; apprehension of trade dispute by the Minister; reporting of dispute if not amicably settled; appointment of conciliator, etc. Regarding the procedure before dispute is reported, the Act provides that parties to the dispute shall first attempt to settle it by an agreed means for settlement of the dispute apart from the Act. It is only when this procedure fails or does not exist that the parties report within seven days and come together to settle the dispute under a conciliator. Notwithstanding this provision, the Minister can apprehend the dispute and decide on the cause of action for the settlement of the dispute.

101. The Federal Ministry of Labor and Employment is the main regulatory agency. There are also well-organized labor unions within Nigeria. The National Industrial Court has exclusive jurisdiction in civil cases connected to labor, employment, trade unions and matters related to the workplace including health and safety. With regard to discrimination, Section 42 of the Nigerian Constitution provides for freedom from discrimination on the basis of sex, age, ethnic group, disability and political affiliation.

102. **The Inspectorate (INSP) Department of the Ministry of Labor and Employment** is the department responsible for monitoring and inspecting the implementation of labor laws and policies in order to ensure compliance. The INSP mandates are to conduct labor inspection services to industrial, agricultural and commercial workplaces to enforce the National Labor Standards; enforce the National Policy on Child Labor and its National Action Plan on the Elimination of Child Labor in Nigeria; supplies technical information and advice to employers and workers concerning the most effective way to complying with Labor Act and related legislations; collates and analyze information needed to preventive mediation, with a view to nipping in the bud, potential areas of conflict between labor and management; educates and builds capacity of professional Officers of the Ministry and Employers on labor administration and emerging trends in the world of work; ensures fair labor practices through intervention and handling of labor complaints; and survey and monitor Labor Health Areas to ensure compliance to labor standards and protection of workers. They are also responsible for gender issues in the ministry; and mainstreaming and coordination of gender related activities in work places and in other ministries; serves as advisor to labor matters to state government; responsible for the administrative, advisory, operational and development (capital projects) matters related to Labor Administration in all the States of the Federation and FCT, Abuja; serves as secretariat of the National Steering Committee on Child Labor (NHC); serves as secretariat to National Housing Facilitation Council (NHC); serves as secretariat to Senior Officers Conference of the Ministry and its parastatals; and serves as co-secretariat to Alliance 8.7 in Nigeria.
103. The Labor Act of 2004 is in force in all States of the federation however, the capacity to enforce labor laws is weak given the availability of resources. In 2015, the Labor Inspectorate employed 660 labor inspectors lower than ILO's recommendation of 3800 in order to adequately enforce labor laws throughout the country (one inspector for every 15,000 workers in industrializing economies). The Act sets out the minimum age for work as 12, and the minimum age for hazardous work as 18. However, there are inconsistencies in the laws making it unclear what minimum ages apply for certain types of work.

Child Rights Act

104. The Federal Child's Right Act (CRA) (2003) codifies the rights of children in Nigeria. The Act was designed to incorporate into its laws all the rights guaranteed in the United Nations' Convention on the Rights of the Child. The U.N. convention, adopted in 1989, states that: "The child shall be protected against all forms of neglect, cruelty and exploitation. He shall not be admitted to employment before an appropriate minimum age; he shall in no case be caused or permitted to engage in any occupation or employment which would prejudice his health or education, or interfere with his physical, mental or moral development." The Act must be ratified by each state to become law in its territory.
105. The details of what the States in Nigeria and FCT has in terms of Social Policy, Regulatory and Institutional Framework is summarized in Annex 6.

Frameworks for Gender Issues

106. Nigeria has committed herself in principle to promoting gender equity and social inclusion. Several policy statements and programs at the state and federal levels clearly indicate the

nation's commitments to achieving the Sustainable Development Goals (SDGs) especially goal 5 on gender equality. The nation established the Ministry of Women Affairs at both federal and state levels in 1999. Nigeria also signed various treaties that promote gender equality and empowerment including the United Nation (UN) Conventions on the Elimination of all forms of Discrimination Against Women (CEDAW) in 2000 and the African Union (AU) Protocol on Women Rights. The Nigerian National Assembly has passed specific bills directed at protecting women such as Senate Bill 66 (2008) which provided for the abolition of all forms of discrimination against women in Nigeria and Senate Bill 300 (2009) which amended the Labor Act to remove discrimination against women relating to night shifts and underground work (Federal Government of Nigeria 2009). The House of Representatives also passed bills that sought to protect women by prohibiting corporate prostitutions (2009), providing support for battered women (2003) and prohibiting Female Genital Mutilation (FGM) (2000).

107. Many States in Nigeria are gender sensitive in its activities and has domesticated some gender-based legislations (see Annex 6) and conventions which Nigeria signed into, for example, the Violence Against Person Prohibition Act of 2015. The Women and Gender Affairs Department of the Ministry of Women Affairs is one of the key operational Departments charged with the responsibility of promoting women's advancement at both State and National levels.

Management of Land Acquisition

108. Land holdings in Nigeria can be broadly classified into public/government, private, and communal. Public/government lands are lands owned by government comprising federal, state and local governments and their agencies. Private lands are defined as those whose ownership is vested in private individuals, families, and lands under customary tenancies. Communal lands are lands which have their ownership vested in communities. These lands are usually administered by community leaders with the assistance of their councils of elders.
109. The legal basis for land acquisition and resettlement in Nigeria is the Land Use Act of 1978 which was modified in 1990. The critical sections regarding land acquisition is as follows:
 - Section 1: Subject to the provision of this Act, all land comprised in the territory of each state in the Federation is hereby vested in the Governor of each state and such land shall be held in trust and administered for the use and common benefit of all Nigerians in accordance with the provision of this Act.
 - Section 2: (a) All land in urban areas shall be under the control and management of the Governor of each State; and (b) all other land shall be under the control and management of the local government within the area of jurisdiction in which the land is situated.
110. Therefore, according to the Land Use Act, all land in Nigeria is vested in the Governor of each State and shall be held in trust for the use and common benefit of all people. The administration of land area is divided into urban land which is directly under the control and management of the Governor in each State; and non-urban land, which is under the control and management of the Local Government. The Governor of each State has the right to grant statutory rights of occupancy to any person or any purpose; and the Local Government will

have the right to grant customary rights of occupancy to any person or organization for agricultural, residential and other purposes.

4.2 Grievance Redress Mechanism

111. In Nigeria, there are different approaches, (but often specific to issues, institutions involved or projects), to make complaints and get redress. First, the justice system provides for courts where aggrieved persons can seek redress. Also, there is the Public Complaints Commission where individuals and groups can lodge complaints against administrative injustice and get redress. Besides, the Ministry of Justice has the Legal Aids Council established under the law (Legal Aids CAP L9, 2011) which provides legal aid and advice to people with low income, among others. Some state government also have different institutional arrangements for providing free legal services to the poor and vulnerable, for example, Public Defender Law and Multidoor Courthouse Law in Delta State Nigeria; and the Special People's Law in Lagos State Nigeria.

4.1.3 State Level Environmental Policy, Regulatory and Institutional Frameworks

112. Almost all the states in the country and FCT have a State Ministry of Environment established by the State government; in some States this office is combined with another function such as Ministry of Environment and Natural Resources in Kaduna State; or Ministry of Environment and Mineral Resources in Enugu State. Some states, in addition to the establishing a Ministry of Environment also has State Environment Protection Agency for example, Kaduna Environment Protection Authority is the enforcement arm of the State Ministry responsible for environment, waste disposal, etc.; or State Waste Management Agency. Some states also have laws and regulations guiding environmental management. The main functions of the State Ministry of Environment are as follows:

- 113. Formulation and implementation of environmental policies and programs for the states;
- 114. Monitoring and enforcement of environment laws and regulations in the state;
- 115. Collaboration with federal government and donor agencies on environmental matters;
 - d. Control of environmental and natural resources degradation;
- 116. Coordinates and supervises the activities of environmental agencies within the state; among others.

The details of what the States in Nigeria and FCT has in terms of Environmental Policy, Regulatory and Institutional Framework is summarized in Annex 6.

SECTION V: ASSESSMENT OF BORROWER’S ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEMS

117. This section describes the E&S management systems in place to manage all identified E&S effects, especially adverse impacts and risks. It describes the main elements of applicable borrower systems and provides an analysis of the acceptability of these systems, considering the level of risk and the extent to which borrower systems and practices are aligned with Bank core principles. That is, the analysis will show the extent to which the applicable systems are Consistent with the core principles and key planning elements expressed in the PforR Guidance Document. It also provides a review of aspects where gaps exist between the two. The assessment was done using the following criteria:

- Strengths of the system, or where it functions effectively and efficiently and is consistent with Bank Policy and Directive for Program-for-Results Financing;
- Inconsistencies and gaps between the principles espoused in Bank Policy and Directive for Program-for-Results Financing and capacity constraints; and
- Actions to strengthen the existing system.

The summary of the assessments is presented in section 5.1. An assessment of the environmental and social systems of individual States is also presented in Annex 6.

118. Information from this analysis – and identification of gaps and opportunities/actions – were used to inform the recommendations and Program Action Plan (PAP).

5.1 Summary of Systems Assessment

Core Principle 1: General Principle of Environmental and Social Management

Bank Policy for Program-for-Results Financing: *Environmental and social management procedures and processes are designed to (a) promote environmental and social sustainability in Program design; (b) avoid, minimize or mitigate against adverse impacts; and (c) promote informed decision-making relating to a program’s environmental and social effects.*

Bank Directive for Program-for-Results Financing: Program procedures will:

- Operate within an adequate legal and regulatory framework to guide environmental and social impact assessments at the program level.
- Incorporate recognized elements of environmental and social assessment good practice, including:
- early screening of potential effects;
- consideration of strategic, technical, and site alternatives (including the “no action” alternative);
- explicit assessment of potential induced, cumulative, and trans-boundary impacts;
- identification of measures to mitigate adverse environmental or social impacts that cannot be otherwise avoided or minimized;
- clear articulation of institutional responsibilities and resources to support implementation of plans; and
- Responsiveness and accountability through stakeholder consultation, timely dissemination of

program information, and responsive grievance redress measures.

Applicability: This is applicable as the PforR program activities will impact on the environment because the impact is deemed to be substantial. The Program has specific activities that will involve rehabilitation and upgrading of existing infrastructures, implantation of community micro-projects, distribution of farm inputs (e.g. fertilizers and seeds and pesticides) to farmers and LIPW which are activities that will impact on the environment. The applicability in terms of specific DLIs is indicated below.

Applicable DLIs	Systems Assessment	Gaps (Federal and State)	Suggestions to Fill Gaps/Proposed Mitigation Measures
<p>i. DLI-1.2. Number of beneficiaries engaged and deployed into LIPW activities on Social services and works.</p> <p>ii. DLI-1.4. Number of direct beneficiaries of completed and functional micro projects.</p> <p>iii. DLI-2.1. Number of farmers utilizing agricultural inputs and services.</p> <p>iv. DLI-2.2. Number of individuals accessing improved agricultural infrastructure.</p>	<p>ii. Federal EIA regulatory framework aligns well with the Core Principle. Specifically:</p> <p>v. National policies, regulation and other legislation for environmental management are well defined. Also, institutional systems identifying environment procedures and legislation to be followed in the country is well defined. States have their own environment department or directorate, who can be contacted for permits or any clarifications if necessary.</p> <p>vi. The national EIA system (EIA Act No. 86 of 1992) provides a comprehensive legal and regulatory framework for environmental and social impact assessment that is broadly consistent</p>	<p>i. At the federal level, there is no requirement within EIA processes for consulting with local communities or vulnerable people</p> <p>ii. there is weak coverage of social issues in national EIA legislation</p> <p>iii. The capacity of the federal ministry of environment to monitor and enforce EIA requirements is weak</p> <p>iv. There is weak capacity in delivering a robust environmental assessment process at the State level</p> <p>v. Many States do not have environmental law, although they have environmental ministries, while some that have laws, their laws do not make provisions or have weak provisions for environmental assessment.</p> <p>vi. The states that do not have environmental laws</p>	<p>i. A robust public consultation strategy is required to improve citizen engagement in entire EIA process.</p> <p>ii. There is a need to incorporate socio-economic assessments in EIA processes.</p> <p>iii. The implementation of environmental and social monitoring/auditing systems should be strengthened</p> <p>iv. Establish a tracking system to monitor environmental and social risks, performance, consultations, etc.</p> <p>v. The Ministry of Environment at both the federal and state levels should reinforce its mandate of monitoring activities.</p> <p>vi. Technical staff at the federal and state levels responsible for environmental and social management must monitor and supervise E&S compliance at least once per quarter, environmental and social management audits every two years.</p> <p>vii. The capacity of States Ministry of Environment to be able to manage and monitors environmental assessments, environmental pollutions, hazards and other environmental issues in the</p>

v. DLI-2.4. Number of existing wet markets with upgraded water and sanitation service.	with the Core Principle 1 of the Bank Policy and Directive. The relevant ministries, namely, FME and FMARD are aware of the need to ensure compliance with EIA procedures.	or provisions for environmental assessments also do not have a clear framework for working with the Federal Ministry of Environment in conducting environmental assessment.	state should be strengthened. viii. There is a need to equip the State Ministries of Environment with necessary facilities and gadgets (including laboratory) to facilitate the monitoring and reporting of environmental issues (pollution, degradation, hazards etc.) in the states.
vi. DLI-3.2. Number of firms receiving conditional operational support grants.	vi. Good grievance mechanisms by the implementing agencies in the States, namely, SCTUs, CSDP, FADAMA and GEEP.	vii. Weak monitoring and evaluation of environmental and social systems at the state level.	ix. States Ministry of Environments (especially those without legal framework and procedures) to should establish a framework (e.g. appoint a focal person) to enable them to adequately work together with the Federal Ministry of Environment on environmental assessment (EIA and Environmental Audit) in their states.
vii. DLI-3.3. Number of firms receiving conditional grants to support IT enhancement	ii. Nigeria has a climate change policy which guides climate action by government. Nigeria is also part of the Paris Agreement and made pledge in her Nationally Determined Contribution (NDC) to reduce carbon emission unconditionally by 20% and conditionally by 45% by 2030 achieving greenhouse gas (GHG) reduction of 74mt per year in 2030 through climate Smart Agriculture (CSA). Nigeria Federal Executive Council (FEC) recently approved the National Action Plan on Gender and Climate Change.	viii. The states do not have documented grievance redress mechanisms. They rely on development agencies' project specific procedures.	x. There is need to Strengthen environmental management capacity: Training in environmental and social management/sessions for budgeting for environmental and social mitigation measures for technical staff in federal and states ministries of environment;
		ix. The states do not have the capacity and equipment to monitor and manage environmental pollution, hazards and other environmental problems in the state.	xi. Although the Nigeria CARES PforR, incorporates some CSA interventions, for example, distribution of inputs - improved seeds and fertilizer to farmers and rehabilitation of irrigation infrastructures, State governments should develop and implement a CSA program as part of Result Area 2.
		x. Policies and programs in Nigeria, for example, the current post COVID-19 economic recovery strategy did not take into account carbon emission reduction pledges. Agricultural support projects by federal and state governments seldom take into account	xii. There should be proper

	<p>iii. NESREA is also empowered to enforce non-compliance with environmental laws and regulations.</p> <p>ix. Most of the States Ministry of Environment have enforcement units and task force.</p>	<p>CSA while limited financial support is provided for CSA practices to facilitate emission reduction.</p> <p>xi. Despite NESREA and effort of States Ministry of Environment, enforcement is still weak and often targeted at raising funds to the detriment of enhancing a safe environment.</p>	<p>training for farmers on the use of pesticides and fertilizer and on effective and safe disposal of pesticide containers.</p> <p>xiii. The is need for the States and NESREA to work together through a task force to enforce compliance with environmental laws and regulations.</p>
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Core Principle 2: Natural Habitats and Physical Cultural Resources

Bank Policy for Program-for-Results Financing: Environmental and social management procedures and processes are designed to avoid, minimize and mitigate against adverse effects on natural habitats and physical cultural resources resulting from program.

Bank Directive for Program-for-Results Financing: As relevant, the program to be supported:

- Includes appropriate measures for early identification and screening of potentially important biodiversity and cultural resource areas.
- Supports and promotes the conservation, maintenance, and rehabilitation of natural habitats; avoids the significant conversion or degradation of critical natural habitats, and if avoiding the significant conversion of natural habitats is not technically feasible, includes measures to mitigate or offset impacts or program activities.
- Takes into account potential adverse effects on physical cultural property and, as warranted, provides adequate measures to avoid, minimize, or mitigate such effects

Applicability: applicable
It is expected that the Program will have moderate impact on natural habitats and physical cultural resources since it directly involves upgrading and rehabilitation of infrastructure and implementation of community micro projects. The applicability in terms of specific DLIs is indicated below.

Applicable DLIs	Systems Assessment	Gaps	Suggestions to Fill Gaps/Proposed Mitigation Measures
<p>i. DLI-1.4. Number of direct beneficiaries of completed and functional micro projects.</p> <p>ii. DLI-2.2. Number of individuals accessing</p>	<p>i. Strength of EIA systems are noted under DLI-1.3 and others above.</p> <p>ii. The Government of Nigeria also has introduced a number of forest policies, programmes and</p>	<p>i. Gaps with respect to ESIA systems are noted under DLI-1.3 and others listed under applicability of core principle 1.</p>	<p>i. Suggestions with respect to ESIA systems are noted under DLI-1.3 and others listed under applicability of</p>

<p>improved agricultural infrastructure.</p>	<p>instruments (e.g., the National Forest Policy 2006, National Biodiversity Strategy and Action Plan, Nigeria REDD+ project) in an effort to reverse the deforestation trend and facilitate natural resources management and biodiversity conservation.</p> <p>iii. The country has a National Forest Policy (NFP) aimed at preserving the country ecosystem as well as boost the current effort of addressing various climate change challenges in Nigeria. These areas are rarely used for construction projects and cannot be used for micro projects in communities they are located.</p> <p>iv. Also, most of the State Governments have forest commissions or forest departments in their Ministry of Environment that are responsible for forest management and biodiversity conservation.</p> <p>v. Federal government and some states have forest edicts, laws and policies to facilitate forestry and natural resources management.</p> <p>vi. Some communities also have community forests and sacred groves and these areas are conserved with the help of government and development agencies and are rarely used for construction of micro projects.</p>	<p>ii. Most of the forest laws and edicts are old and outdated even dating back to colonial times and needs to be updated.</p> <p>iii. Although Nigeria has national parks and forest reserves some of the reserves have been deforested and some are now described as “deforested forest reserves”.</p> <p>iv. Most states have not implemented community forestry initiatives thus, most communities rarely conserve their forest resources and some community forests have been donated for development projects.</p>	<p>core principle 1.</p> <p>ii. The states should support community forestry by creating community forestry management committees.</p> <p>iii. The implementing agencies should ensure that community micro projects are not established in community forests or sacred groves and important biodiversity sites in the communities.</p>
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Core Principle 3: Public and Worker Safety

1.1.1 Bank Policy for Program-for-Results Financing: *Environmental and social management procedures and processes are designed to protect public and worker safety against the potential risks associated with (a) construction and/or operations of facilities or other operational practices developed or promoted under the program; (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials; and (c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.*

Bank Directive for Program-for-Results Financing:

- Promotes community, individual, and worker safety through the safe design, construction, operation, and maintenance of physical infrastructure, or in carrying out activities that may be dependent on such infrastructure with safety measures, inspections, or remedial works incorporated as needed.
- Promotes use of recognized good practice in the production, management, storage, transport, and disposal of hazardous materials generated through program construction or operations; and promotes use of integrated pest management practices to manage or reduce pests or disease vectors; and provides training for workers involved in the production, procurement, storage, transport, use, and disposal of hazardous chemicals in accordance with international guidelines and conventions.
- Includes measures to avoid, minimize, or mitigate community, individual, and worker risks when program activities are located within areas prone to natural hazards such as floods, hurricanes, earthquakes, or other severe weather or climate events.

Applicability: This is applicable. The program will involve rehabilitation and upgrading of infrastructure, implementation of community micro projects, upgrading of water and sanitation infrastructures at wet markets, LIPW that will may impact on public and worker safety. The applicability in terms of specific DLIs is indicated below.

Applicable DLIs	Systems Assessment	Gaps	Suggestions to Fill Gaps//Proposed Mitigation Measures
<p>i. DLI-1.2. Number of beneficiaries engaged and deployed into LIPW activities on Social services and works</p> <p>ii. DLI-1.4 Number of direct beneficiaries of completed and functional micro projects.</p> <p>iii. DLI-2.2 Number of individuals accessing improved agricultural infrastructure.</p>	<p>i. The legal/regulatory system of the country includes provisions for protecting worker, community and public safety.</p> <p>ii. NEREA has regulations to protect the public from hazardous chemicals, pesticides, and agrochemicals (National Environmental (Hazardous Chemicals and Pesticides) Regulations, S.I. No</p>	<p>i. The national EIA system does not comprehensively encompass aspects of public and worker safety.</p> <p>ii. There is limited awareness by the general public, especially farmers, on public health and safety issues, particularly in relation to exposure to hazardous materials, fertilizers and pesticide handling and safety precautions.</p>	<p>i. The Federal Ministry of Environment should work towards improving the EIA system to incorporate important aspects lacking in the system, for example, issues relating to public and workers' safety and broader ESHS. Meanwhile, they should ensure that EIA reports submitted for review cover social issues especially relating to public and worker safety.</p> <p>ii. States and Federal Ministry of Environment and States and Federal Ministry of Labour should collaborate and build the capacity of the leaders in the different institutions in the sector in order for them to become knowledgeable on issues relating to occupational</p>

<p>iv. DLI-2.4 Number of existing wet markets with upgraded water and sanitation service</p> <p>v. DLI-3.2. Number of firms receiving conditional – operational support grants.</p>	<p>65, 2014).</p> <p>iii. The country also has some legal statutes and provisions to protect workers. Some of these include, Labour Act of 2004, the Trade Union Amended Act of 2005, and the Employees Compensation Act of 2010.</p> <p>iv. The federal government has the Ministry of Labour while most state governments also have Ministries of Labor, and these ministries also work to protect the rights of workers.</p> <p>v. The Federal Child’s Right Act (CRA) (2003) codifies the rights of children in Nigeria. It has penalties on the use of child labour</p>	<p>iii. Lack of awareness of relevant authorities’ staff to appreciate the need to ensure occupational health and safety.</p> <p>iv. Lack of OHS guidelines and procedures to be adopted by contractors, firms (especially MSEs), employers of labour and workers in most of the States</p>	<p>health and hazard and how to deal prevent and deal with it.</p> <p>iii. State governments should ensure that government and employers of labour in the state enrol or cover their workers under the Workers Compensation Insurance.</p> <p>iv. Provide on-site training to workers and labourers that will be involved in rehabilitation and upgrading work so that they will be familiar with OHS issues at their workplace.</p> <p>v. State governments should ensure that contractors, and other employers of labour especially those involving construction, health work, sanitation and waste management and handling of chemicals provide personal protective equipment for their workers.</p> <p>vi. Ensure that all workers engaged under the LIPW are provided with a relevant personal protective and safety equipment.</p>
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Core Principle 4: Land Acquisition

1.1.2 Bank Policy for Program-for-Results Financing: *Land acquisition and loss of access to natural resources are managed in a way that avoids or minimizes displacement, and affected people are assisted in improving, or at least restoring, their livelihoods and living standards.*

Bank Directive for Program-for-Results Financing: As relevant, the program to be supported:

- Avoids or minimizes land acquisition and related adverse impacts;
- Identifies and addresses economic and social impacts caused by land acquisition or loss of access to natural resources, including those affecting people who may lack full legal rights to assets or resources they use or occupy;
- Provides compensation sufficient to purchase replacement assets of equivalent value and to meet any necessary transitional expenses, paid prior to taking of land or restricting access;
- Provides supplemental livelihood improvement or restoration measures if taking of land causes loss of income-generating opportunity (e.g., loss of crop production or employment); and
- Restores or replaces public infrastructure and community services that may be adversely affected.

Applicability: Applicable

Given that any land which will involve economic and physical displacement will not be eligible for community micro-projects, land acquisition, involuntary resettlement and compensation are already excluded from the program. Nevertheless, the implementation of micro-projects in DLI-1.4 may involve the building of new community projects, and it is expected that the land to be used would be community land or land donated by individuals in the communities voluntarily, since this land is free of any use or occupation. Thus, core principle 4 will apply to the Nigeria CARES PforR program specifically to the system assessment focused on voluntary land donation.

Applicable DLIs	Systems Assessment	Gaps	Suggestions to Fill Gaps//Proposed Mitigation Measures
i. DLI-1.4 Number of direct beneficiaries of completed and functional micro projects.	<p>i. Nigeria has the Land Use Act of 1978 which was modified in 1990 is the legal basis of land acquisition and administration but doesn't include anything with regards land donation.</p> <p>ii. Given the numerous gaps in the Act, a Presidential Technical Committee on Land Reform (PTCLR) is working on issues regarding land reform in Nigeria.</p>	<p>i. Although community members can freely donate their lands under customary practices, there is no provision for voluntary land donation in the Land Use Act.</p> <p>ii. Given that there is no framework or legislation regarding voluntary land donation, there could be coercion for land donation leading to impoverishment of the people.</p>	i. There is need for each state to establish a framework/protocol for voluntary land donation.

Core Principle 5: Social Considerations - Indigenous Peoples and Vulnerable Groups

Bank Policy for Program-for-Results Financing: Due consideration is given to cultural appropriateness of, and equitable access to, program benefits giving special attention to rights and interests of Indigenous Peoples and to the needs or concerns of vulnerable groups.

Bank Directive for Program-for-Results Financing:

- Undertakes free, prior, and informed consultations if Indigenous Peoples are potentially affected (positively or negatively) to determine whether there is broad community support for the program.
- Ensures that Indigenous Peoples can participate in devising opportunities to benefit from exploitation of customary resources or indigenous knowledge, the latter (indigenous knowledge) to include the consent of the Indigenous Peoples.
- Gives attention to groups vulnerable to hardship or disadvantage, including as relevant the poor, the disabled, women and children, the elderly, or marginalized ethnic groups. If necessary, special measures are taken to promote equitable access to program benefits.

Applicability: This is applicable. It is expected that vulnerable people will be impacted on given that the Program is a recovery program focused on the poor and vulnerable and the new poor (those that became poor due to the economic crisis caused by the COVID-19 pandemic). Note that there are no groups in Nigeria that meet the World Bank's criteria for Indigenous Peoples. However, we followed the third point on Bank Directive for indigenous peoples and vulnerable groups to look at the systems that address the needs of groups vulnerable to hardships, including women, youths and people with disabilities. The applicability in terms of specific DLIs is indicated below.

Applicable DLIs	Systems Assessment	Gaps	Suggestions to Fill Gaps/Proposed Mitigation Measures
i. DLI-1.1 Number of Individual/HHs receiving periodic social transfers disaggregated by vulnerability profile ii. DLI-1.2 Number of beneficiaries engaged and deployed into LIPW activities on Social services and works. iii. DLI-1.3	i. Chapter IV of the Nigerian Constitution contains a variety of fundamental rights set out in Sections 33 - 44. Of particular relevance is Section 42, which prohibits discrimination on the grounds of ethnic origin, sex (gender), religion, or linguistic affiliation. ii. The conditional cash transfer program of the federal and state governments of Nigeria, which is currently in all states has a laid down cash transfer procedure that is coordinated by the Federal Ministry of Humanitarian Affairs, Disaster Management and Social Development. The National NCTU and the SCTU.	i. Many States in the federation are yet to adopt the Violence Against Persons (Prohibition) Law. ii. Many of the states do not have adequate framework and arrangement for combating GBV or prosecuting and punishing those involved in GBV thus offenders often do not get punished. Similarly, many of the state do not	i. States without Gender Policy should set in motion the process of developing their gender policy which will contain guidelines and processes of preventing discrimination against vulnerable groups and PWDs. ii. States without a gender-based violence response team should quickly set up Domestic and Gender-based (Sexual) Violence Response Team (DSVRT) to for quick response to issues of GBV in the states. iii. States should carry

<p>Number of HH/members supported with livelihood grant.</p> <p>iv. DLI-1.4 Number of direct beneficiaries of completed and functional micro projects.</p>	<p>iii. There is a Federal Ministry of Women Affairs and Social Development that deals with all gender related issues especially as it concerns the vulnerable especially women youths and People living with Disabilities (PWDs). They have a unit that deals with GBV and discrimination. Also, most state governments have Ministry of Women Affairs/Gender Affairs and Social Development. These ministries help to handle the issues of GBV and discriminations of vulnerable people.</p> <p>iv. Also, the federal government of Nigeria has signed many treaties on women issues including the CEDAW in 1999 and has a gender policy. There is also the Violence Against Persons (Prohibition) Act 2015.</p> <p>v. Several policy statements and programmes at the state and federal levels clearly indicate the nation's commitments to achieving the Sustainable Development Goal (SDG) 5 on gender equality.</p> <p>vi. Many states have laws and frameworks in dealing with violence and discrimination, for example, Edo has Violence Against Persons (Prohibition) Law of Edo State 2019, while some states, in addition, have also response teams to deal with GBV for example Lagos State has a Domestic and Sexual Violence Response Team (DSVRT).</p>	<p>have policy to ensure inclusion of minority/ ethnic groups at local level or the extreme poor in programs</p> <p>iii. Also, many of the States do not have gender policy or guidelines for dealing with vulnerable people and PWDs to ensure that they are not treated with contempt and partiality.</p> <p>iv. There is lack of capacity in Ministries of Women Affairs and Social Development to tackle the issues of GBV and other issues relating to gender and youths.</p> <p>v. There is weak knowledge of the public especially vulnerable groups regarding the issues of GBV and how to handle cases of GBV especially sexual abuse.</p>	<p>out regular enlightenment programmes for the public and capacity building programs for staff of gender/women ministries.</p> <p>iv. States should conduct and organize inclusive community-based development association to drive inclusive participation of vulnerable groups in the program and in the selection of microprojects.</p> <p>v. All community microprojects should be designed to include universal access for all persons living with disability and to ensure accessibility to the very poor and all ethnic groups in the program.</p>
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Core Principle 6: Social Conflict

Bank Policy for Program-for-Results Financing: Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.

Bank Directive for Program-for-Results Financing: Considers conflict risks, including distributional equity and cultural sensitivities.

Applicability: This is applicable. Conflicts may arise during the execution of community micro projects and also LIPW. There is also a lingering issue of conflicts between herders and famers which has affected agricultural development in Nigeria.

Applicable DLIs	Systems Assessment	Gaps	Suggestions to Fill Gaps/Proposed Mitigation Measures
<p>i. DLI-1.2 Number of beneficiaries engaged and deployed into LIPW activities on Social services and works.</p> <p>ii. DLI-1.4 Number of direct beneficiaries of completed and functional micro projects.</p>	<p>i. The constitution of the Federal Republic of Nigeria 1999 (as amended) provides in Section 17 (3) (g) that “the State shall direct its policy towards ensuring that provision is made for public assistance in deserving cases, or other conditions of need.</p> <p>ii. Nigeria Federal and State presence is strong throughout the country with well-trained police and security forces who maintain the rule of law and also provides security against bandits and during clashes between farmers and herders. There is also a justice system with courts where people can seek redress.</p> <p>iii. The federal government also has the public complaints commission where people can make complaints regarding administrative</p>	<p>i. Lack of grievance redress mechanism for the poor and vulnerable. Although Nigeria has a justice system with courts where people can seek justice, poor and vulnerable people do not have the capacity to seek justice in courts. Most of the states do not have GRM mechanisms where poor and vulnerable can make complaints and get redress.</p> <p>ii. The available GRM are weak and ad-hoc and not properly institutionalised. Although some states indicted how project related grievances are redressed, for example in the cash transfer program carried out by the SCTU, these arrangements are ad-hoc and needs to be properly institutionalised. This is to ensure that people’s grievances are properly redressed even when there is need to seek</p>	<p>i. Strengthened stakeholder engagement and grievance redress mechanisms and increased transparency to provide information and communication avenues for complaints and their resolutions.</p> <p>ii. Affected states to set up community level (through relevant traditional rulers/ institution) conflict resolution committee to address conflict related to headers / farmers / water users’ conflicts and other conflicts related to marginalization of ethnic minority in the program</p> <p>x. iii. Strengthen existing GRM in CSDP, SCTU, FADAMA State Job Creation Unit/ SME Support Units and GEEP.</p> <p>iv. States without a framework to provide free legal services/legal aid and advice to the</p>

	<p>injustices.</p> <p>iv. CSDP, SCTU, FADAMA State Job Creation Unit/ SME Support Units and GEEP have GRM for dealing with complaints by participants.</p>	<p>further redress if the individual is not satisfied with the outcome of existing arrangements.</p> <p>iii. There is no solution yet to the lingering crisis between headers and farmers</p>	<p>citizens should work towards providing that.</p> <p>v. States without an agency responsible for grievance redress and peaceful resolution of disputes should make effort to provide one.</p> <p>vi. State governments should provide or develop action plan for dealing with farmers and herders clashes especially in States where it is rampant.</p>
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SECTION VI: RECOMMENDATIONS AND ACTIONS

119. This section recommends measures that will be taken to strengthen system performance in line with the gaps and risks identified in the system assessment section to ensure that the Program interventions are aligned with the Core Principles of Bank Policy for Program-for-Results financing. The identified key areas are elucidated below. These actions may be further refined and adjusted during the consultation process and the implementation of the Program.

6.1 Environmental Summary and Recommendations

120. Although Nigeria has a well-defined environmental system that is close to the core principle on environmental assessment, significant gaps still remain. For example, the EIA process in Nigeria does not cover the social aspects as it should. Often impacted communities and vulnerable groups are not consulted during the EIA process and when even when they are consulted at the beginning, they are not carried along during the review and approval process thus, their concerns may not be reflected in EIA document. Besides, the monitoring of EIA implementation is weak as there is no tracking system to monitor environmental and social risks, performance.

121. At the State level, there is weak capacity in delivering a robust environmental assessment process. Although the Ministry of Environment exists in States, many States do not have an adequate environmental legal framework as most laws do not make enough provisions for waste management and OHS issues and have weak provisions for environmental assessment. The states that do not have environmental laws or provisions for environmental assessments also do not have a clear framework for working with the Federal Ministry of Environment in conducting environmental assessment. There is equally weak monitoring and evaluation of environmental and social systems at the state level and enforcement is weak. Pollution monitoring is non-existent in most Nigeria States. Based on the assessment some recommendations were made as follows:

122. There is a need to modify some aspects of the EIA system to ensure that social assessments are fully covered and that impacted communities are carried along from the beginning until the end of the review process. Currently, effective monitoring of the EIA process in imperative. In this regard, government (state and federal) should create a tracking system to monitor environmental and social risks performance during program implementation.

123. State governments should institute a scheduled program to build and strengthen the capacity of technical staff of the States Ministry of Environment to be able to manage and monitor environmental assessments processes, environmental pollutions, hazards and other environmental issues in the state. At the long run, there is need to equip the State Ministries of Environment with necessary facilities and gadgets (including laboratory) to be able to monitor and report environmental issues (pollution, degradation, hazards etc.) in the states.

124. State governments should formulate/develop guidelines and manuals for mainstreaming stakeholder engagement process, environmental, and OHS issues into the implementation of the Program. The World Bank Groups' Environmental Health and Safety guidelines will be

adapted for environmental and OHS issues. The manual should help guide the operation of MSE's, contractors and workers and laborers (including those involved in community micro-projects) who are part of Nigeria CARES PforR. The guidelines should contain the requirement of adequate on-site training on OHS issues to workers and laborers, provision of personal protective equipment (PPE) and other guidelines relating to specific activities of MSE's.

125. Conduct environmental screening of program activities, carry out half yearly review and monitoring of progress on environmental and social issues and equally conduct annual environmental and social audit. This is to ensure compliance of the program activities with the environmental and social standards and regulations.

6.2 Social Summary and Recommendations:

126. Although the Nigeria CARES PforR is meant to enhance livelihoods and food security among the poor and the vulnerable groups who are worse hit by the economic crisis caused by COVID-19 and as such has a lot of social benefits. the assessment of the social systems towards the achievement of the DLI shows the need to fill significant gaps if the objective of enhanced livelihoods, increased food production and food security for the vulnerable as the poor will be achieved. Going by the program boundary, activities that requires land acquisition that will involve involuntary resettlement and compensation are already excluded from the program activities. Based on the assessment some recommendations were made as follows:
 127. Strengthen stakeholder engagement and the existing GRM in CSDP, SCTU, FADAMA State Job Creation Unit/ SME Support Units and GEEP to build the confidence of the beneficiaries on the system GRM. In the long run, States without an agency responsible for grievance redress and peaceful resolution of disputes should institute a legal framework and create a department to facilitate grievance redress.
 128. Affected states to set up community level (through relevant traditional rulers/ institution) conflict resolution committee to address conflict related to headers / farmers / water users' conflicts and other conflicts related to marginalization of ethnic minority in the program.
 129. States without a gender-based violence response team should quickly set up Response Team for quick response to issues of GBV in the states and support it with robust public enlightenment program about the evils of Sexual Exploitation and Abuse and Sexual Harassment.
 130. States should conduct security needs assessment which would serve as the basis for dealing with security issues.
 131. All community micro projects should be designed to include universal access for all persons living with disability and also ensure accessibility to the very poor and all minority ethnic groups in the program.
 132. All State government in collaboration with the SCCU should develop, adopt and implement a voluntary land donation protocol to screen all land selected for micro projects to ensure

that all land chosen for community micro project are community land, government land or individual land freely donated and free of all encumbrances. The land donation protocol must include the principle of informed consent and the power of choice, monitoring mechanism and grievance redress mechanism. As indicated in the exclusion criteria, any land selected for micro project that will involve displacement / resettlement will not be eligible for community micro projects.

133. Following the recommendations, the breakdown of actions to be included in the Program Action Plan (PAP) with indicative timeline, responsibility for implementation and indicators for measuring the completion of such actions are detailed in the Table 6.1 below.

Table 6.1: Program Action Plan (PAP) for Environmental and Social Management

S/No	Action Description	Due Date	Responsible Party	Completion Measurement
1	Institute a scheduled Capacity building program to strengthen the capacity of technical staff of the States Ministry of Environment on environmental management, environmental and social assessment and OHS skills and use of PPEs.	December 2020. To be implemented throughout Program Implementation	State CARES Coordinating Unit (SCCU)	Submit Capacity /Training plans /Modules, Lists, of participants including Number of technical staff
2	Conduct environmental and social screening of program activities, half yearly review and monitoring of progress on environmental and social issues and annual environmental and social audit	Environmental screening before program activities Review and monitoring within 3 months of start of program implementation	Federal CARES Support Unit; State CARES Coordinating Unit and Implementing Agencies	Completed report with recommendations about E&S issues, including the progress of the implementation of actions indicated in this table.
3	Formulate/develop guidelines and manuals for mainstreaming stakeholder engagement process, environmental, and OHS issues (including training and use of PPE) into the implementation of the Program.	Prior to program implementation	Federal CARES Support Unit; State CARES Coordinating Unit, States Ministry of Environment	Completed guidelines in booklet form disseminated to stakeholders, training provided, and the guidelines operationalized
4	Strengthen (formalize, document and disseminate) existing GRM in CSDP, SCTU, FADAMA State Job Creation Unit/ SME Support Units and GEEP to make it more	December 2020	Federal CARES Support Unit; State CARES Coordinating Unit and Implementing Agencies and	Revise, Complete GRM report and disseminate GRM procedures to all stakeholders.

	robust and build trust ¹³ ..		State Legal Unit/Ministry of Justice	
5	States to set up community level (through relevant traditional rulers/ institution) conflict resolution committee to address conflict related to headers / farmers / water users' conflicts and other conflicts related to marginalization of ethnic minority in the program	December 2020	State CARES coordination Unit, CSDA, Ministry of Local Government and Chieftaincy,	List and contacts of committee members and Memorandum of inauguration, minutes of committee meetings.
6	States without a GBV response team should quickly set up and publicize its Response Team for response to issues of SEA/SH and support it with robust public enlightenment program.	Dec. 2020 /Jan 2021	States Ministry of Women Affairs and Social Development and Ministry of Justice	Document setting out referral pathway and available service provider by the relevant MDA
7	Community management committees including representatives from different categories of persons in the community including community leaders, youths, women groups and PWD's should be set to manage the implementation of community micro projects.	December 2020	State CARES coordination Unit, States Ministry of Women Affairs and Social Development, CSDA	Design of Micro projects with universal access, list of committee members, Minutes of committee and community meetings on selection and design and implementation of micro projects.
8	All SCCU should develop, adopt and implement a voluntary land donation framework/protocol in line with World Bank Guideline to screen all land selected for micro projects. All donated land must be free of economic, social and physical encumbrances	December 2020	SCCU, State Ministry of Land, Urban and Physical Development and Ministry of Local Government and Chieftaincy Affairs	Developed voluntary Land donation framework/protocol with screening checklist disclosed to all stakeholders
9	Ensure Engagement of Environmental and social specialist in the PIU at the federal and state level (for states without environment and social specialist in the implementing agencies)	Before Program implementation	Federal CARES support unit and state Cares Coordinating Units	Inclusion of Environmental and social Specialist in the team
10	Conduct Security Need Assessment	January 2021	Northeast and Northwest states	Development of security action plan

¹³States without GRM legal framework should be encouraged to institute a legal framework and create an agency to facilitate grievance redress with the first year of program implementation.

SECTION VII. SUPPORTING ANNEXES AND REFERENCE DOCUMENTS

Annex 1: Summary of Result Areas, DLIs, Disbursement Timing, Verification Procedure

Results Area	DLI	Timing after Effectiveness	Verification Protocol
Results Area 1: Increased Social Transfers, Basic Services, and Livelihood Support for Poor and Vulnerable Households	Number of beneficiaries receiving periodic transfers	6, 12, 18 months	IVA reviews: (i) Proof of individual selection from agreed State Register and enrolment by gender and vulnerability profile; (ii) Proof of successful direct cash transfer payments to beneficiaries; (iii) Beneficiaries satisfaction records or sample assessment (70% scale); (iv) Percentage of GRM cases treated (70% scale);
	Number of beneficiaries engaged and deployed into LIPW activities on social services and receiving stipends	6, 12, 18 months	IVA reviews: (i) Proof of individual selection from agreed State Register and enrolment by gender and vulnerability profile; (ii) Records of attendance and participation in public works; (iii) Proof of successful direct stipends payments to beneficiaries; (iv) Beneficiaries satisfaction records or sample assessment (70% scale); (v) Percentage of GRM cases treated (70% scale);
	Number of beneficiaries supported with livelihood grant	6, 12, 18 months	IVA reviews: (i) Proof of individual selection from agreed State Register and enrolment by gender; (ii) Report of training attendance/register; (iii) Report of successful grant transfer to beneficiaries; (iv) Beneficiaries satisfaction records or sample assessment (70% scale); (v) Percentage of GRM cases treated (70% scale);
	Number of direct beneficiaries of completed and functional microprojects	6, 12, 18 months	IVA reviews: (i) Record of number of CDPs/GDPs appraisal by the appraisal team and approved by CSDA management team, and funded as agreed in PIM; (ii) Records of number and profile of benefiting community and or vulnerable groups members utilizing micro-projects; (iii) Beneficiaries satisfaction records or site sample assessment (70% scale); (iv) Percentage of GRM cases treated (70% scale);
Results Area 2: Increasing Food Security	Number of farmers utilizing agricultural	6, 12, 18 months	IVA reviews: (i) Registers of names, numbers and gender of farmers receiving crop and livestock inputs, including the specific types of inputs (e.g. varieties of improved seeds) and quantities received by each farmer;

and Safe Functioning of Food Supply Chain	inputs and services		<ul style="list-style-type: none"> (ii) Registers of names, numbers and gender of farmers receiving mechanization services and extension and advisory services; (iii) Counter-signed forms from leaders of at least 70 percent of farmer groups confirming that farmers are utilizing the inputs; (iv) Relevant procurement records (either invoice, delivery note, payments etc.)
	Number of individuals accessing improved agricultural infrastructure	6, 12, 18 months	<p>IVA reviews:</p> <ul style="list-style-type: none"> (i) Registers of names, numbers and gender of individual benefitting from the infrastructure; (ii) The works contracts issued; (iii) Completion of safeguards screening checklists for at least 70 percent of contracts; (iv) Works completion reports certified by local FADAMA-CARES desk; (v) Number of people hired relative to agreed norms; (vi) In addition, the IVA visits a sample of the sites to validate the records.
	Number of farmers utilizing agricultural assets (production and small-scale primary processing)	6, 12, 18 months	<p>IVA reviews:</p> <ul style="list-style-type: none"> (i) Register with names, number and gender of farmers receiving assets for each category (production and small-scale primary processing/preservation); (ii) Counter-signed forms from leaders of at least 70 percent of farmer groups to confirm that farmers are utilizing the assets; (iii) Relevant procurement records (either invoice, delivery note, payments etc.);
	Number of existing wet markets with upgraded water and sanitation services	6, 12, 18 months	<p>IVA reviews:</p> <ul style="list-style-type: none"> (i) The works contracts issued; (ii) Completion of safeguards screening checklists for at least 70 percent of contracts; (iii) Works completion reports certified by local FADAMA-CARES desk; <p>In addition, the IVA visits a sample of the markets to confirm that water and sanitation services have been upgraded as approved plan and works contracts.</p>
Results Area 3: Facilitating Recovery and Enhancing Capabilities of Small and Medium Enterprises	Number of firms receiving matching grants to support new loans originated after Covid-19	6, 12, 18 months	<p>IVA verifies that firms benefitting from the co-financing grants meet the vetting criteria (including eligibility and enumeration requirements as defined in the operations manual). In addition, IVA reviews documentation and evidence that includes but not limited to:</p> <ul style="list-style-type: none"> (i) evidence of the loan portfolio or financial assets of at least 70 percent of beneficiaries (verified through relevant financial institutions); (ii) evidence of origination of new loan (approved applications), loan agreements of at least 70 percent of beneficiaries; including verification of bank account / digital wallets of at least 70 percent

			of beneficiaries, (iii) percentage of GRM cases treated (unsatisfactory if less than 70;
	Number of firms receiving operational support grants	6, 12, 18 months	For a sample of supported formal and informal firms, IVA verifies that the vetting criteria (eligibility and enumeration requirements as defined in the operations manual) are met; reviews the number of beneficiary firms run by and employing women and youths; percentage of GRM cases treated (unsatisfactory if less than 70%). For formal firms, IVA reviews documentation and evidence that includes but not limited to: <ul style="list-style-type: none"> (i) state employment registers to check employment enrolment records of at least 70 percent of beneficiary formal firms that received employee's salary payment grants; (ii) evidence of direct wage/salary payments into the bank account or digital wallets of employees of for at least 70 percent of beneficiary firms. (iii) documentary evidence for at least 70 percent of beneficiary formal firms that received support grants to cover payments to private security personnel and purchase of solar panels; For informal firms; IVA reviews documentation and evidence that includes but not limited to: <ul style="list-style-type: none"> (i) evidence of biometric enrolment to the CARES state's transacting platform e.g. BVN, mobile phone number for at least 70 percent of beneficiary informal firms; (ii) evidence of the firm membership of trade associations and/or microcredit institutions for at least 70 percent of beneficiary informal firms; (iii) evidence of payment of salary grants into mobile money wallet or bank accounts for at least 70 percent of employees of supported informal firms
	Number of firms receiving grants to support IT-enhancement	6, 12, 18 months	For a sample of supported firms, IVA verifies that the vetting criteria (including eligibility and enumeration requirements as defined in the operations manual) are met and reviews the number of beneficiary firms run by and employing women and youths. IVA will review the for at least 70 percent of beneficiary firms' documentation and evidence that includes but not limited to: <ul style="list-style-type: none"> (i) evidence (i.e. receipts) of acquisition and deployment of IT solutions (ii) IT physical equipment; (iii) percentage of GRM cases treated (unsatisfactory if less than 70%)

Annex 2: Applicability of Core Environmental and Social Principles (CP) to Nigeria CARES Disbursement Linked Indicators (DLIs)

Result Area	DLI	CP1 Environment	CP2 Natural Habitats	CP3 Public & Worker Safety	CP4 Land Acquisition	CP5 Vulnerable groups	CP6 Social Conflict
1: Increased social transfers, basic services, and livelihood support to poor and vulnerable households	1.1 Number of Individual/HHs receiving periodic social transfers disaggregated by vulnerability profile	Not Applicable as there are no physical works supported by the DLI.	Not Applicable as there are no physical works supported by the DLI.	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI.	Applicable. There is a possibility of exclusion of vulnerable groups or elite capture if the process for identification of vulnerable people is not done objectively and does not follow due process.	Not Applicable.
	1.2 Number of HH/members supported with livelihood grant.	Not Applicable as there are no physical works supported by the DLI.	Not Applicable as there are no physical works supported by the DLI.	Not Applicable as there are no physical works supported by the DLI.	Not Applicable as there are no physical works supported by the DLI.	Applicable. There is a possibility of exclusion of vulnerable groups if the process for identification of vulnerable people is not done objectively and did not follow due process.	Not Applicable.

Result Area	DLI	CP1 Environment	CP2 Natural Habitats	CP3 Public & Worker Safety	CP4 Land Acquisition	CP5 Vulnerable groups	CP6 Social Conflict
	1.3 Number of beneficiaries engaged and deployed into LIPW activities on Social services and works	Not Applicable as there are no physical works supported by the DLI.	Not Applicable as there are no physical works supported by the DLI.	Applicable. The youth and women may be exposed to dangers and risks associated with rehabilitation works, refuse collection and traffic management, for example dusts, noise, fumes, physical injuries, hazardous and dangerous material in wastes, road traffic accidents, etc.	Not Applicable as there are no physical works supported by the DLI that will involve land acquisition.	This is applicable. Vulnerable youth and women may be affected as they may be discriminated from this program activity.	Conflicts are not envisaged however; youth groups and women may react by demonstrating against perceived injustice in the recruitment or partiality in the treatment of beneficiaries.
	1.4 Number of direct beneficiaries of completed and functional Micro projects	This will be applicable as the social infrastructure that will be implemented for example education, water, roads, skill centers projects will impact on the environment.	This is applicable as the infrastructure that will be implemented for example education, water, roads, skill centers projects will impact on natural habitats.	This is applicable as hired laborer or other workers building roads and skill centers may be exposed to environmental hazards, for example, dust, fumes, and physical injuries.	This may be applicable as the beneficiary communities will be establishing the community micro projects on community, government or individually donated land.	This is applicable as there could be discrimination against vulnerable groups in the beneficiary communities notwithstanding that broad-based community/group participation will be one of the selection criteria.	This may be applicable as there could be disagreements and conflicts within the communities regarding planning and implementation of the social infrastructures and micro projects.

Result Area	DLI	CP1 Environment	CP2 Natural Habitats	CP3 Public & Worker Safety	CP4 Land Acquisition	CP5 Vulnerable groups	CP6 Social Conflict
2: Increasing food security and safe functioning of food supply chains	2.1 Number of farmers utilizing agricultural inputs and services	This is applicable as some inputs for example inorganic fertilizers and pesticides if poorly handled will impact on the environment.	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical or labor-intensive works supported by the DLI	Not Applicable as there are no physical works supported by the DLI.	This may not be applicable as there would be participatory identification of the poor and vulnerable to select beneficiaries for individual activities, including women, and youth.	This is not applicable as conflicts are not envisaged under this DLI.
	2.2 Number of individuals accessing improved agricultural infrastructure.	This is applicable as the rehabilitation and improvement of existing tertiary irrigation canals and feeder roads and establishment of boreholes and tube wells will impact on the environment due to the physical works that will be involved.	This is applicable as the establishment of boreholes and tube wells may impact on natural habitats.	This is applicable as workers and laborer may be exposed to dangers and risks associated with rehabilitation works and establishment of boreholes and tube wells.	This is not applicable as the land acquisition is not envisaged under this DLI especially as the physical works are for rehabilitation of existing agricultural infrastructure.	This is not applicable	This is not applicable as conflicts are not envisaged under this DLI.
	2.3 Number of farmers utilizing agricultural assets (production and small-scale primary processing)	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical or labor-intensive works supported by the DLI	Not Applicable as there are no physical or labor-intensive works supported by the DLI	Not Applicable as there are no physical works supported by the DLI.	This may not be applicable as there would be participatory identification of the poor and vulnerable to select beneficiaries for individual activities,

Result Area	DLI	CP1 Environment	CP2 Natural Habitats	CP3 Public & Worker Safety	CP4 Land Acquisition	CP5 Vulnerable groups	CP6 Social Conflict
						including women, and youth.	
	2.4 Number of existing wet markets with upgraded water and sanitation service	This is applicable as the upgrading of water and sanitation services will impact on the environment due to the physical works that will be involved.	This is not applicable as the activities will involve only upgrading of water and sanitation services at existing wet markets.	This is applicable as workers and laborer involved in the upgrading activities which will involve physical works may be exposed to dangers and risks associated with physical works.	This is not applicable as the land acquisition is not envisaged under this program especially as the activity will be carried out in existing wet markets.	This is not applicable as vulnerable groups are not directly involved under this DLI.	This is not applicable as conflicts are not envisaged under this DLI.
3: Facilitating Recovery and Enhancing Capabilities of MSEs	3.1. Number of firms receiving conditional capital grant to support new - post-COVID19 loans.	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical or labor-intensive works supported by the DLI	Not Applicable as there are no physical works supported by the DLI.	Not Applicable	Not Applicable

Result Area	DLI	CP1 Environment	CP2 Natural Habitats	CP3 Public & Worker Safety	CP4 Land Acquisition	CP5 Vulnerable groups	CP6 Social Conflict
	3.2. Number of firms receiving conditional – operational support grants.	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	This is applicable as the firms will be re-absorbing and recruiting new employees and thus, will need to provide OHS measures for employees.	Not Applicable as there are no physical works supported by the DLI.	Not Applicable	Not Applicable
	3.3 Number of firms receiving conditional grants to support IT enhancement.	This is applicable as upgrading of digital technology may lead to the generation of e-waste.	Not Applicable as there are no physical works supported by the DLI	Not Applicable as there are no physical or labor-intensive works supported by the DLI	Not Applicable as there are no physical works supported by the DLI	Not Applicable	Not Applicable

Annex 3: Preliminary Risk Matrix

PDO	Result Area	DLIs	Result Indicators/Output	Environmental and Social Benefits	Environmental and Social Risks/Risk Rating
<p>To protect livelihoods and food security of poor and vulnerable families and facilitate recovery of local economic activity in all participating states across Nigeria.</p>	<p>1: Increased social transfers, basic services, and livelihood support to poor and vulnerable households</p>	<p>1.1 Number of Individual/HHs receiving periodic social transfers disaggregated by vulnerability profile</p>	<p>Enrolled Individuals/Households receiving periodic transfers</p>	<p>The overall environmental and social benefits is expected to be substantial. The PforR will facilitate the recovery of households especially vulnerable ones heavily impact by the economic crisis caused by COVID-19. There will be enhanced income and reduction in poverty, increased food consumption with increase in disposable income. The livelihoods of youth, women and other vulnerable groups will be completely enhanced.</p>	<p>The environmental and social risks is deemed to be substantial. Environmental risks will be associated with the social infrastructure that will be rehabilitated for example education, water, roads, skill centers projects. Environmental risks will include air, noise, water, soil and groundwater pollution, waste management etc. Also, some workers involved in labor intensive public works may be exposed to environmental risks associated rehabilitation works, refuse collection and traffic management, for example dusts, noise, fumes, physical injuries, hazardous and dangerous material in wastes. Social risks will be associated with labor intensive public works and land donation / acquisition for community micro projects. Youth and women involved with traffic management to road traffic accidents, women may be exposed to sexual exploitation and abuse and sexual harassment. There could also be elite capture and exclusion of vulnerable groups from social transfers. Conflicts may also be experienced in the implementation of community micro-projects.</p>
		<p>1.2 Number of HH/members supported with livelihood grant.</p>	<p>Individuals enrolled and receiving stipends for participating in labor intensive public works in social services</p>		
		<p>1.3 Number of beneficiaries engaged and deployed into LIPW activities on Social services and works</p>	<p>Individuals enrolled and trained on livelihood programs and Households/ members supported with livelihood grants</p>		
		<p>1.4 Number of direct beneficiaries of completed and functional Micro projects</p>	<p>Completed Community and Group public assets development plans/micro projects/Individuals /Households /Groups benefiting from improved services</p>		

PDO	Result Area	DLIs	Result Indicators/Output	Environmental and Social Benefits	Environmental and Social Risks/Risk Rating
					<p>There is also a possibility that the government especially at the state level do not have the capacity to manage environmental and social risks. This situation may delay the execution of the project in some states or even prevent the execution depending on the existing condition. The assessment of the institutions and systems, including legal and regulatory frameworks and the capacity to manage the program will help determine whether the program/projects can be successfully executed in the states.</p> <p>Other risk associated with the program is security risk especially in the States in the North East and North West Nigeria where there is insurgency and banditry, and in States where there have been incessant famers and herders' clashes. These conflicts have affected the entire social fabric across the country and could prevent the execution of the PforR program/projects.</p>

PDO	Result Area	DLIs	Result Indicators/Output	Environmental and Social Benefits	Environmental and Social Risks/Risk Rating
	2: Increasing food security and safe functioning of food supply chains	2.1 Number of farmers utilizing agricultural inputs and services	Increased production as farmers utilize improved inputs, extension and advisory services, and mechanization support.	The overall environmental and social benefits of this result area is expected to be substantial. Increased production of agricultural commodities as a result of the PforR financing will enhance food security, reduce vulnerability of households to shocks associated with lack of food and also enhance their resilience to climate stressors. The use of improved agricultural technology will also have climate Co-Benefits.	<p>The environmental and social risks is adjudged to be substantial. Potential environmental risks include air, noise, water, soil and groundwater pollution, waste issues, biodiversity loss as a result of rehabilitation of tertiary irrigation canals; tertiary / feeder roads; and upgrading of sanitary infrastructures in wet market. Operation, health and safety (OHS) risks will be associated with labor intensive works. Also risks associated with use of organic fertilizer and GHG emissions as a result of increased agricultural activities.</p> <p>Potential social risks include discrimination or vulnerable people in the distribution of improved seeds, fertilizers and livestock inputs; seed multiplication; delivery of extension and advisory services; and provision of mechanization services. Women may also be exposed to sexual exploitation and abuse and sexual harassment.</p> <p>There is also a possibility that the government especially at the state level do not have the capacity to manage environmental and social risks. This situation may delay the</p>
2.2 Number of individuals accessing improved agricultural infrastructure.	Increased access to improved agricultural infrastructure (tertiary irrigation canal and feeder roads etc.) as they are rehabilitated and improved.				
2.3 Number of farmers utilizing agricultural assets (production and small-scale primary processing)	Increased capacity to produce and process/preserve food as farmers access assets to increase food production and engage in small-scale primary processing.				
2.4 Number of existing wet markets with upgraded water and sanitation service	Wet markets function safely as existing wet markets are upgraded with water and sanitation services.				

PDO	Result Area	DLIs	Result Indicators/Output	Environmental and Social Benefits	Environmental and Social Risks/Risk Rating
					<p>execution of the project in some states or even prevent the execution depending on the existing condition. The assessment of the institutions and systems, including legal and regulatory frameworks and the capacity to manage the program will help determine whether the program/projects can be successfully executed in the states.</p> <p>Other risk associated with the program is security risk especially in the States in the North East and North West Nigeria where there is insurgency and banditry that has affected the entire social fabric and could prevent the execution of the PforR program/projects.</p>
	3: Facilitating Recovery and Enhancing Capabilities of MSEs	3.1. Number of firms receiving conditional capital grant to support new - post-COVID19 loans.	Financial constraints of MSEs eased and undisrupted production process/service delivery.	The overall environmental and social benefits of this result area is expected to be substantial. The recovery of lost jobs and recruitment of new employees that will result from grants and operational support to MSEs will help to reduce unemployment and boost spending and consumption and thus boost the entire economy. Its enhancement will enhance the	The potential environmental risk associated with this result area is moderate. The enhanced operations of the firms will lead to increased waste generation including e-waste, increased carbon emission (for MSEs that burn a lot of fossil fuels), air pollution, noise, etc.
		3.2. Number of firms receiving conditional – operational support grants.	Reduce job loses/increase job retention.		

PDO	Result Area	DLIs	Result Indicators/Output	Environmental and Social Benefits	Environmental and Social Risks/Risk Rating
		3.3 Number of firms receiving conditional grants to support IT enhancement.	MSEs' resilience and business continuity achieved, and capabilities upgraded.	operation and performance of the firms and thus enhance their income. The will in turn translate into more employment, reduced poverty and economic growth. There is also some climate Co-Benefits associated with the use of improved technology.	<p>potential risk of exclusion of women own businesses among others.</p> <p>There is also a possibility that the government especially at the state level do not have the capacity to manage environmental and social risks. This situation may delay the execution of the project in some states or even prevent the execution depending on the existing condition. The assessment of the institutions and systems, including legal and regulatory frameworks and the capacity to manage the program will help determine whether the program/projects can be successfully executed in the states.</p> <p>Other risk associated with the program is security risk especially in the States in the North East and North West Nigeria where there is insurgency and banditry that has affected the entire social fabric and could prevent the execution of the PforR program/projects.</p>

Annex 4: Key Environmental & Social Risks Associated with Program Activities

Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
1: Increased social transfers, basic services, and livelihood support to poor and vulnerable households	1.1 Number of Individual/Households receiving periodic social transfers disaggregated by vulnerability profile	Negligible	Negligible	Social transfers to aged people, chronically ill, urban poor, widows and new poor (Due to COVID-19) will facilitate poverty reduction (some people will exit from poverty especially the new poor), enhanced consumption thus enhancing nutrition outcomes and food security, enhanced longevity given available funds to treat chronically ill people who will receive the transfers. The payment system which is through payment service providers (PSP) will enhance financial inclusion with all it associated benefits.	Negligible
	1.2 Number of Household/individuals supported with livelihood grant	Negligible	Negligible	Enhanced livelihoods and welfare of the households/individuals , (households would be returned to even better condition pre COVID-19). Note that besides grants, capacity of individuals will be built to facilitate their livelihood activities.	The beneficiaries can misuse or divert the grants from livelihood activities and engage in negative activities that may be counterproductive, for example, funeral ceremonies, marriage ceremonies (marrying new wives) and

Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
					<p>naming ceremonies. These will indirectly lead to negative consequences and thus impact negatively on their livelihoods and make them to become more vulnerable to crisis and disaster.</p>
	<p>1.3 Number of beneficiaries engaged and deployed into LIPW activities on Social services and works</p>	<p>There will be indirect benefits which will include a clean environment due to proper waste management, reduced air and water pollution, climate Co-Benefits due to enhanced waste management, and proper sanitation due to availability of repaired toilets.</p>	<p>The DLI directly does not impact on the environment. However, indirectly, labor intensive public work could lead to air pollution, water pollution, soil contamination, hazardous materials from waste disposal, among others. Women and youths involved in the LIPW will be exposed to the dangers relating to these environmental hazards.</p>	<p>There will be direct and indirect social benefits. Direct social benefits include reduced unemployment among youth and women, enhanced income and reduction in poverty, reduced vulnerability to shocks (health shock, shock due to lack of food, etc.). Indirect benefits include reduced road traffic accidents, and reduced school dropout rates and enhanced educational outcomes with repair of classroom blocks.</p>	<p>Directly, there could be conflicts which may result from perceived injustice in the recruitment and treatment of workers. Indirectly, youth and women involved in labor intensive work will be exposed road traffic accidents (for those involved in traffic control), health impacts due to exposure to waste especially toxic and hospital wastes, accidents and injuries during rehabilitation work, exposure to COVID-19 due to increased contact with other people, etc. There could also be sexual exploitation and abuse and sexual harassment both during recruitment of workers and at the</p>

Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
					workplace. Beneficiaries may also be exposed to COVID-19 pandemic.
	1.4 Number of direct beneficiaries of completed and functional Micro projects	Environmental benefits that will accrue from this DLI include clean environment due to improved water and sanitation services and waste management. (e.g. basic services- health, education, water, roads, skill centers etc.)	Environmental risks include air pollution, ground water pollution, loss of biodiversity, noise and water pollution and waste generation due to the implementation of micro-projects.	Social benefits include enhanced income for the people, reduced incidence of disease outbreaks, access to clean and portable water, access to roads, enhanced skill acquisition and employment generation, reduced poverty and vulnerability to shocks (for example health shocks), enhanced access to education, as a result of the micro-projects.	Conflicts within the communities regarding planning and implementation of the social infrastructures and micro projects, elite capture, coercion for land donation and discrimination against the very vulnerable persons in the communities in the design of micro projects (lack of universal access). There could also be risks associated with the use of child labor and exposure to COVID-19.
2: Increasing food security and safe functioning of food supply chains	2.1 Number of farmers utilizing agricultural inputs and services	Use of modern seeds, inorganic and organic fertilizer, etc. (cropping system diversification) is a climate smart agriculture (CSA) practice and has carbon Co-Benefits.	Improper use of agricultural inputs, for example, pesticides and fertilizer can cause soil, and ground and surface water pollution. There is possibility of cumulative impacts on soil and ground	The achievement of this DLI will lead to increased food production, enhanced income for the farmers, food security, reduced poverty, acquisition of assets, and reduced vulnerability of the households and individuals to shocks.	There could be risks, for example, increased poverty and vulnerability, related to discrimination of vulnerable groups in the distribution of agricultural inputs / services, possibility of sexual exploitation and abuse and sexual

Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
			water quality due to fertilizers and pesticides.	It will enhance the recovery of households from the economic crisis due to COVID-19.	harassment during the distribution.
	2.2 Number of individuals accessing improved agricultural infrastructure.	There is potential climate Co-Benefits due to improved soil conservation and land management practices.	Potential environmental risks include air, noise, water, soil and groundwater pollution, waste problem, biodiversity loss as a result of rehabilitation of tertiary irrigation canals; tertiary and feeder roads; agricultural warehouse. Others include wastes such as, excavated soil piles and debris, etc. GHG emissions as a result of increased agricultural activities. There is also possibility of cumulative impacts due to combined effect of ground water pollution, waste problems and GHG emission caused under this DLI and pre-existing pollution from other sources.	Social benefits enhanced food production and increased output, enhanced food security, increased income for the famers and poverty reduction. Farmers suffering from shocks due to COVID-19 will quickly recover given improved access to production infrastructure and attendant benefits.	There is a risk associated with child labor. There is a possibility of use of child labor rehabilitation of tertiary irrigation canals; tertiary / feeder roads and exclusion of people living with disability.
	2.3 Number of farmers utilizing	Negligible	Processing of agricultural	Increased food production and	Negligible

Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
	agricultural assets (production and small-scale primary processing)		products will generate waste and cause environmental pollution. This could also increase the cumulative impacts on the environment when combined with existing pollutants.	processing will enhance the income of farmers, reduce poverty and their vulnerability to shocks and enhance food security.	
	2.4 Number of existing wet markets with upgraded water and sanitation service	Clean environment due to effective water and sanitation services and waste management as a result of the upgraded water and sanitation infrastructure. Also, there will be climate Co-Benefits due to effective waste management.	Potential environmental risks include air, noise, and water pollution, waste issues, as a result of physical works associated with upgrading of water and sanitary infrastructures in wet market. Cumulative impacts on the environment due to the pollutants is envisaged.	Health related benefits (reduced disease especially diarrhea, and related diseases) and safety of people using the wet markets due to effective water and sanitation services at the wet markets.	Operation, health and safety (OHS) risks for laborer and workers involved in the upgrading works. There could be risks associated with the use of child labor in upgrading of water and sanitation services at wet markets and exclusion of universal access
3: Facilitating Recovery and Enhancing Capabilities of MSEs	3.1. Number of firms receiving conditional capital grant to support new - post-COVID19 loans.	Negligible	Negligible	Increased liquidity (as the capital grants will free-up cash that would have used for loan repayment) and enhanced operation and thus, increased income for the MSEs, reduced business risk and enhanced/boosted	Negligible

Result Areas	DLIs	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
				ability to invest in business growth and development. The economy of the country will also be enhanced with a thriving MSE sector.	
	3.2. Number of firms receiving conditional – operational support grants.	Negligible	Increased operations of the MSEs due to operational support grant may lead to increased carbon emission (for MSEs that burn a lot of fossil fuels), air pollution, and noise.	This will lead to increased employment, reduced underemployment. Enhanced employment will boost spending and consumption and thus boost the entire economy. It will enhance the operation and performance of the firms and thus enhance their income. The will in turn translate into more employment, reduced poverty and economic growth.	There could be sexual exploitation and sexual harassment in re-engaging previously employed and engagement of unemployed.
	3.3 Number of firms receiving conditional grants to support IT enhancement.	There climate Co-Benefits associated with the use of improved and clean technology by the MSEs	Potential increase in e-waste due to upgrading and acquisition of new ICT infrastructure.	Enhanced income for the firms due to enhanced operations and business continuity as result of deployment of IT services	Negligible

Annex 5: States Choice of Platform and Implementing Agency for each of the three DLI's under Result Area 3

No.	States	DLI1 & Implementing Agency	DLI2 & Implementing Agency	DLI3 & Implementing Agency
1	Abia	GEEP with Ministry of SME development - Social Investment Program as implementing agency	GEEP with Ministry of SME development - Social Investment Program as implementing agency	GEEP with Ministry of SME development - Social Investment Program as implementing agency
2	Adamawa	Poverty Alleviation & Wealth Creation Agency (PAWECA).	Poverty Alleviation & Wealth Creation Agency (PAWECA).	Poverty Alleviation & Wealth Creation Agency (PAWECA).
3	Akwa Ibom	MSME Development Fund, with Min. of Finance and Ministry of Trade and Investment as implementing agency	Ibom Enterprise Development Scheme (IBEDS), with Ministry of Trade & Investment MTI as implementing agency	MSME Development Fund, with Min. of Finance and Ministry of Trade and Investment as implementing agency
4	Anambra	Anambra State Small Business Agency	Anambra State Small Business Agency	Anambra State Small Business Agency
5	Bauchi	Bauchi State MSME Empowerment Scheme, with Ministry of Cooperatives and SME Development Agency, SME department as implementing agency	Bauchi State MSME Empowerment Scheme, with Ministry of Cooperatives and SME Development Agency, SME department as implementing agency	Bauchi State MSME Empowerment Scheme, with Ministry of Cooperatives and SME Development Agency, SME department as implementing agency
6	Bayelsa	GEEP with Bayelsa State Microfinance Enterprise Development Agency (ByMEDA) as implementing agency	GEEP with Bayelsa State Microfinance Enterprise Development Agency (ByMEDA) as implementing agency	GEEP with Bayelsa State Microfinance Enterprise Development Agency (ByMEDA) as implementing agency
7	Benue	GEEP, with Social Investment Program as implementing agency	GEEP, with Social Investment Program as implementing agency	GEEP, with Social Investment Program as implementing agency
8	Borno	Renaissance MFB, GEEP	Ministry of Commerce, with State MFB, GEEP	Borno Investment LTD, GEEP
9	Cross-river	MSME Development Funding Program, with Micro-finance and enterprise development agency as implementing agency willing to explore GEEP	MSME Development Funding Program, with Micro-finance and enterprise development agency as implementing agency willing to explore GEEP	MSME Development Funding Program, with Micro-finance and enterprise development agency as implementing agency willing to explore GEEP
10	Delta	GEEP, with Delta State Micro, Small & Medium Enterprises Development Agency as Implementing Agency,	Youth Entrepreneurship and Wealth Creation Scheme of the State, with Office of the Job/Wealth Creation Officer as the Implementing Agency,	GEEP, with the Delta State Micro, Small & Medium Enterprises Development Agency as Implementing Agency

11	Ebonyi	MSME Development Fund, EBSU integrated approach, MFB, BoI GEEP and supervising ministry works together in vetting process and transacting process (technical committee).	MSME Development Fund, EBSU integrated approach, MFB, BoI GEEP and supervising ministry works together in vetting process and transacting process (technical committee).	MSME Development Fund, EBSU integrated approach, MFB, BoI GEEP and supervising ministry works together in vetting process and transacting process (technical committee).
12	Ekiti	Ekiti State Micro Credit Lending, MSME Development Fund, Women Cooperative Lending, Women Support Lending, with Microfinance and Enterprise Development Agency	Ekiti State Micro Credit Lending, MSME Development Fund, Women Cooperative Lending, Women Support Lending, with Microfinance and Enterprise Development Agency	Ekiti State Micro Credit Lending, MSME Development Fund, Women Cooperative Lending, Women Support Lending, with Microfinance and Enterprise Development Agency
13	Gombe	BIP Business Intervention Programme, with Gombe Enterprise Development and Promotion Agency (GEDPA) as implementing agency	BIP Business Intervention Programme, with Gombe Enterprise Development and Promotion Agency (GEDPA) as implementing agency	GEEP
14	Jigawa	GEEP, with Ministry of Commerce and Directorate of Economic Empowerment as implementing agency	GEEP, with Directorate of Economic Empowerment as implementing agency	Not interested in this DLI
15	Kaduna	Micro-credit Board as implementing agency, with KADEP as implementation Platform	Micro-credit Board as implementing agency, with KADEP as implementation Platform	Micro-credit Board as implementing agency, with KADEP as implementation Platform
16	Kano	GEEP	Kano State Industrial Credit Scheme or Cluster Program, with Ministry of Industry as implementing Agency	Kano State - BoI Matching Fund GEEP
17	Katsina	MSME Development Program, with Department of Empowerment and Special Intervention (DESI) as implementing agency. GEEP is within these program and happy to collaborate.	MSME Development Program, with Department of Empowerment and Special Intervention (DESI) as implementing agency. GEEP is within these program and happy to collaborate.	MSME Development Program, with Department of Empowerment and Special Intervention (DESI) as implementing agency. GEEP is within these program and happy to collaborate.
18	Kebbi	GEEP	GEEP	GEEP

19	Kogi	Implementing Agency: Kogi State Social Investment Program (KGSIP) Existing program: MSME program Existing platform: GEEP (to implement the MSME Program)	Implementing Agency: Kogi State Social Investment Program (KGSIP) Existing program: MSME program Existing platform: GEEP (to implement the MSME Program)	Implementing Agency: Kogi State Social Investment Program (KGSIP) Existing program: MSME program Existing platform: GEEP (to implement the MSME Program)
20	Kwara	GEEP, with Kwara State Social Investment Program as implementing agency (KWASSIP)	GEEP, with Kwara State Social Investment Program as implementing agency (KWASSIP)	GEEP, with Kwara State Social Investment Program as implementing agency (KWASSIP)
21	Nasarawa	MSME Revolving Loan Scheme, with Ministry of Trade, Industry & Investment as implementing agency, GEEP	No defined program yet, GEEP	Nasarawa State Bureau for Information & Communication Technology, GEEP
22	Ondo	Implementing Agency: Ministry of Commerce and Industry & Ondo State Micro Credit Agency (OSMA) MSME Development Program	Implementing Agency: Ministry of Commerce and Industry & Ondo State Micro Credit Agency (OSMA) Technology Development Program	Implementing Agency: Ministry of Commerce and Industry & Ondo State Micro Credit Agency (OSMA) No existing program
23	Oyo	OYSG MSME Development Fund, with Oyo State Investment and Public Private Partnership Agency (OYSIPA) as implementing agency	OYSG MSME Development Fund- Post Covid 19 Economic Recovery Scheme, with Oyo State Investment and Public Private Partnership Agency (OYSIPA) as implementing agency	No identified program yet, with Oyo State Investment and Public Private Partnership Agency (OYSIPA) as implementing agency
24	Plateau	PLASMIDA ENTREPRENEURSHIP AND SKILL ACQUISITION PROGRAM (PESA), with PLATEAU STATE MICROFINANCE DEVELOPMENT AGENCY (PLASMIDA) as implementing agency willing to explore GEEP (on vetting committee and also for disbursement)	PLASMIDA ENTREPRENEURSHIP AND SKILL ACQUISITION PROGRAM (PESA), with PLATEAU STATE MICROFINANCE DEVELOPMENT AGENCY (PLASMIDA) as implementing agency willing to explore GEEP (on vetting committee and also for disbursement)	PLASMIDA ENTREPRENEURSHIP AND SKILL ACQUISITION PROGRAM (PESA), with PLATEAU STATE MICROFINANCE DEVELOPMENT AGENCY (PLASMIDA) as implementing agency willing to explore GEEP (on vetting committee and also for disbursement)
25	Taraba	GEEP	GEEP	GEEP
26	Zamfara	GEEP, with Ministry of Commerce, Industry & Tourism as implementing agency	GEEP, with Ministry of Commerce, Industry & Tourism as implementing agency	Skills Acquisition Centers, with Ministry of Commerce & Industrial/skills Acquisition Center as implementing agency

27	Sokoto	GEEP with Sokoto State Micro Small & Medium Enterprise Development Agency (SOSMEDA) as implementing Agency	GEEP with Sokoto State Micro Small & Medium Enterprise Development Agency (SOSMEDA) as implementing Agency	GEEP with Sokoto State Micro Small & Medium Enterprise Development Agency (SOSMEDA) as implementing Agency
28	Enugu	SME Agency	SME Agency	SME Agency
29	Osun	OSSG/BOI, MSME FUND, OSUN MICRO-CREDIT AGENCY leveraging GEEP	OSSG/BOI, MSME FUND, OSUN MICRO-CREDIT AGENCY leveraging GEEP	OSSG/BOI, MSME FUND, OSUN MICRO-CREDIT AGENCY leveraging GEEP
30	Edo	Edo State MSME Fund, EDSG-BOI Scheme, with Ministry of Wealth Management as implementing Agency	Edo State Government - Social Investment Programme, Edo State Government - CBN Programme, with Edo State Skill Development Agency as implementing agency	Edo Innovation Hub, Edo Technology Incubation Centre, with Edo State Skill Development Agency as implementing agency
31	FCT	AEA - Micro Credit Scheme with Abuja Enterprise Agency [AEA] as implementing agency	Micro-Business Support Scheme with Abuja Enterprise Agency [AEA] as implementing agency	Tech Support for MSMEs, with Abuja Enterprise Agency [AEA] as implementing agency
	DLI	No. of States using GEEP	No. of States using own State Program	No identified program yet, opportunity for GEEP
RA 3	DLI1	16	15	
	DLI2	17	14	
	DLI3	17	10	2

Annex 6: Environmental and Social Policy, Regulatory and Institutional Framework of States and the Assessment of their Strengths and Weaknesses

Zone	State	Environmental Laws/Regulations and Management Frameworks	Assessment of their Strengths/Weaknesses	Social Laws/Regulations and Management Frameworks	Assessment of their Strengths/Weaknesses
North East					
	Adamawa	Ministry of Environment; Adamawa State Environment Protection Agency (ASEPA); The Law for the Preservation and Control of Forest, and Wild Life Conservation Law.	The Law for the Preservation and Control of Forest is the environmental law existing in the State. This law which commenced in February 1938 is obsolete and considers only forestry issues. Currently, there is no law for the protection and management of environment including issues relating to environmental assessment. The State leverages on the Federal EIA process but there is no guideline or established framework on how this is carried out. The wildlife conservation law obsolete. The representatives indicated that the law is being reviewed for passage by the State House of Assembly. The officers that responded to the questions indicated that the State has environmental standards and OHS procedures for MSEs but no law yet.	Ministry of Labour and Productivity; Ministry of Women Affairs	Officers that responded to the questionnaire indicated that they domesticated existing Labour Laws in Nigeria. There was no evidence of gender law or policy guiding gender issues in the State. How the issue of GBV is addressed through the collaborative effort of Hope Centre at Specialist Hospital Adamawa, Ministry of Women Affairs, Ministry Health, and Ministry of Justice. There is no Grievance Redress Mechanism (GRM) in place at the State level although there exist informal GRM mechanisms at the community level.
	Bauchi	Bauchi State Environmental Protection and Conservation Agency Law 2017;		Ministry of Women Affairs and Child Development, Gender Policy and	The gender policy and action plan stipulated the roles of different

				Implementation Plan 2014-2016.	ministries and agencies in gender mainstreaming of development actions.
	Borno	Ministry of Environment; Borno State Environmental Protection Agency Law; Borno State Environmental Protection Agency (BOSEPA); the Burning of Bush Control (Amendment) Edict 1987; the Felling of Tree (Control) Edict 1986.	There was no evidence of any environmental law and regulation regarding environmental management especially environmental assessment. The State rely on NESREA for the enforcement of environmental impacts assessment policies, laws and ethics	Ministry of Women Affairs and Social Development;	Issues relating to relating GBV, disabilities and other vulnerable groups are handled by the Ministry of Women Affairs and Social Development in collaboration with Nigerian Police Force, Nigerian Bar Association, NGOs and development agencies operating in the State. There was no evidence of policy framework guiding gender issues and GRM.
	Yobe	Ministry of Environment;	The representatives indicated that they adopted the Federal EIA process guided by the EIA Act in regulating/managing the EIA process in the State. They also indicated that the state has an environmental law, but this was not presented. Thus, we could not certify that the state has a law that guides government actions regarding environment issues. They do not have environmental standards and OHS regulations for MSEs.	Ministry of Women Affairs; Yobe State Small and Medium Scale Industries Credit Board.	The State has no law regarding gender issues, but the State recently adopted the federal government of Nigeria gender policy. The Ministry of Women Affairs is responsible for addressing issues relating to GBV. They state representatives indicated that as a policy all MDAs are required to involve the Ministry of women affairs in the planning and preparation of activities pursuant to

					ensuring inclusiveness of women. The State has submitted a Bill for the protection of Children in the State but has not been passed into law.
	Gombe	Ministry of Environment and Forest Resources (GSMEFR); Gombe State Environment Protection Agency (GOSEPA); GOSEPA Law;	They indicated that the ministry carries out impact assessment on behalf of government, no laws or regulation guiding the activities of the ministry. The team representing the state indicated that they adopt federal environmental regulations and laws.	Ministry of Women Affairs and Social Development; Ministry of Youth and Sport Development;	Yet to domesticate gender laws, State referral pathway for victims of gender based violence established, State action plan developed, weak capacity a major problem,
	Jigawa	Jigawa Environmental protection Agency (JISEPA); Due Process and Project Monitoring Bureau Law No 13 of 2019.	The team members indicated that the State has Environmental Protection Law, but this was not cited. They also indicated that they follow the EIA process of the Federal Government and they do not have regulation or procedure for OHS in the State. The Due Process and Project Monitoring Bureau Law for monitoring Bureau Law is mainly focused on procurement and does not have provision for monitoring of contractors regarding environmental compliance.	Ministry of Women Affairs; Jigawa State Gender Policy; A Law to make provision for the payment of social security allowance to the disabled in the state and other matters related therewith the Law, Law No 06 2007; Jigawa State Persons with Disability Law; Jigawa State Social Protection Policy.	The State has a robust policy and legal framework for social interventions and to deal with social exclusion and other social risks. However, there is a possibility that the achievement of DLI 1. 1 of Nigeria CARES project in the state may be jeopardized by the provision in section 3(2) of the social security law that “each person listed in schedule A of the Law shall be paid the sum of seven thousand naira a month and may be reviewed by the Governor

					from time to time subject to the approval of the Assembly.
	Taraba	No document regarding environmental legal, regulatory and institutional frameworks.		No document regarding social legal, regulatory and institutional frameworks.	
North West	Kaduna	Kaduna State Environmental Protection Authority Law 2010; Kaduna State Regulation on Waste Management N0 1 of 2010; Regulation on control of water pollution sources No 2 of 2010; Regulation on Effluent Limitation and Management No 3 2010; Regulation on Impact Assessment and Audit No 4 2010; Regulation on Bush Burning Control No 5 2010; Regulation on Control and Management of Hazardous Substances No 6 2010; Regulation on Special Work Places No 7 2010; Kaduna State Policy on Environment 2019, Kaduna State Ministry of Environment and Natural Resources.	The laws, regulations and policy are robust enough for protection of all aspects of the environment and includes assessment and cooperation with the Federal Ministry of Environment. We did not cite the staff list and designation of the ministry to determine the capacity to manage environmental issues	Kaduna State Ministry of Women Affairs and Social Development; Kaduna State Gender Equity and Social Inclusion (GESI) Policy 2017; Standard Operating Procedures for Prevention and Response of Gender – Based Violence (GBV); Adopted the Grievance Redress Mechanism Procedure of National Safety Net Program; Kaduna State Social Protection Policy, 2020 and; Violence against persons (prohibition) Law 2018. The State also has a GBV response team.	Kaduna State has a robust policy and legal framework for dealing with social risks. The State adopted a robust GRM was a quick method of reporting grievance through an App.GESI Policy thrust is the socio - economic empowerment of women, orphans and vulnerable children (OVCs), young people, persons with disabilities, the elderly and the poor. Th State equally has GBV response team to quickly deal with issues of sexual and GBV, and SH.
	Kano	Kano State Environment Policy;	The environment policy has a goal to protect the environment from degradation, loss of productive land and environmental pollution.		
	Katsina	State Environmental Protection Agency Law; Ministry of Environment; State Environmental Protection Agency; Ecological Fund Law 2005; Forestry Law;	The State representatives reported that the State Ministry of Environment works with Federal Ministry of Environment and NESREA in	Katsina State Ministry of Social Development; Katsina State Ministry of Women Affairs:	The State is in the process of domesticating National Gender Policy;

			enforcing the EIA LAWS in the State however, they did not provide any working document to that effect.		
	Sokoto	Ministry of Environment; Sokoto State Environment Sanitation Law No 7 of 2015; Sokoto Environmental Protection Agency (SEPA established by edit No 10 of 1995; Mobile Court in Environmental Sanitation; Public Health Consolidation Edict No. 5 CAP 118 of 1985, in addition to national guidelines and legislations of public health, guide the activities of environmental health officers.	The SEPA is responsible for environmental assessments. The state has a good framework for environmental management; however, there is inadequate manpower to manage environmental issues.	Ministry of Establishment and Pension Matters (Labor); Ministry of Social Welfare; Ministry of Women Affairs and Social Services established by Edict No 9 of 1997.	The State established some institutions legal frameworks for ensuring the provision of social services and protection of the elderly, youth, women, people living with disabilities and other vulnerable people
	Kebbi	Ministry of Environment and Solid Mineral; State forestry Edict No 1, 1997; Kebbi State Environmental Protection Agency.	The representatives of the State reported that Kebbi State Environmental Protection Agency conducts Environmental impact assessment before any propose is undertaking. They also reported that lack of capacity is a major constraint. They indicated that there are no OHS standard for firms in the state.	Ministry of Women Affairs and Social Development; Child's rights Law;	Representatives reported that the State adopted the National Gender Policy. There is GRM at the community level in CSDP. There is a dedicated hot line at the State Agency (SA) level to receive complaints from aggrieved members
	Zamfara	A law to make provision for the establishment of Zamfara Environment Protection Agency 2000;	The law is for protection of environment in the state. It is not clear if there is provision for environmental assessment, however, evidence from cover pages of EIA scanned and submitted shows that they State rely of Federal Ministry		

			of Environment for EIA related issues. There is no provision OHS procedure for MSEs in the state.		
North Central	Benue	No information regarding the environmental regulatory and institutional framework		No information regarding the social regulatory and institutional framework	
	Kogi	A Law for the Establishment of Kogi State Environmental Protection Board, 2006; A Law for the Establishment of Kogi State Sanitation and Waste Management Board 2013; Ministry of Environment and Natural Resources (KSMENR);	The Kogi State Environmental Protection Board Law requires in section 30 the submission of Environmental Impact Assessment for any physical development (manufacturing or industries) before commencement. Section 31 requires submission of Environmental Audit every two years. KSMENR is also mandated to carry out Environmental Impact Assessment. Available list of staff of the ministry shows that the technical departments, except Forestry Department are understaffed. Environment and Ecology Department has only five staff, and climate change has only two staff. Thus, the capacity for environmental mandate of the ministry is lacking.	Kogi State Ministry of Women Affairs and Social Development; Kogi State Action Plan for Peace and Security of Women and Children; Kogi State Child Protection Policy; Priority Actions Program against ending of violence against children; Kogi State Marriage Act; Kogi State Plan of Action for Vulnerable Children.	The State has a robust policy and regulatory framework for dealing with issues regarding women, children and vulnerable persons. However, the policies seem to be lacking in issues relating to sexual violence and sexual harassment, and GRM.
	Kwara			Kwara State Community and Social Development Agency;	
	Nasarawa	Ministry of Environment and Natural Resources; Nasarawa State	The state has some legal and regulatory framework for	Ministry of Women Affairs and Social Development;	The state has robust legal and regulatory framework

		Environment Law; Nasarawa State Waste Management Bureau; Nasarawa State Environment Protection Agency (NASEPA);	environmental management, however, the environment law did not cover issues related to environmental assessment, for example, EIA. The State team indicated that there are insufficient pool of experts, lack of capacity and infrastructure are major constraints to environmental management.	Nasarawa State Dangerous Infectious Disease (Emergency Prevention) Regulations 2020; Nasarawa State Child's Right Law 2005; Legal Notice No 1 of 2020- Executive Order for the Protection of Children and Implementation of Nasarawa State Child's Right Law 2005; and Nasarawa State Community and Social Development Agency Law	for managing social issues relating to child protection and rights, gender parity and women empowerment, gender-based and domestic violence, social safety nets, and social inclusion. However, poor capacity, lack of manpower and equipment are major constraints.
	Niger	Niger State Environment Protection Agency; Niger State Environmental Protection Agency (Amendment) Law 2011; Niger State Public Health Law; Niger State Environment Policy; Ministry of Environment and Forestry.	The overall goal of the environment policy is the promotion of State sustainable social and economic development through the sound management of the environment and forest resources. It is clear from the documents provided how issues of environmental assessment is carried out. The environmental protection agency deals with issues related to waste management and pollution control.	Ministry of Gender Affairs and Social Development; Social Protection Policy.	The Ministry of Gender Affairs and Social Development formulates policies to promote the welfare and security of women, children, destitute, handicaps and other vulnerable groups in line with the National Policy on women and vulnerable groups. Although the State has a social protection policy, the procedure and framework for handling issues relating to GBV, SH, orphan and vulnerable children and GRM is not clear.

	Plateau	Ministry of Environment; Plateau Environmental Protection and Sanitation Agency (PEPSA);	Ministry of Environment has a technical department responsible for environmental assessment and climate change.	Ministry of Women Affairs and Social Development; Child's Right Law 2005 was gazette in the state in 2017; and a Law to make Provision for the Establishment of a Gender and Equal Opportunities Commission and for the Elimination of All Forms of Discrimination and Other Matters Connected. There is also Plateau State Safeguarding Children Policy 2014; and Disability Commission.	The Ministry of Women Affairs and Social Development deals with issues related to GBV and collaborates with Ministry of Justice in the State, National Human Rights Commission and NAPTIP to handle cases of rape and sexual assault. They state team indicated that there are also Women Peace Mentors/network working side by side with the Traditional Institution to curb Gender Based Violence. Generally, the state has a robust institutional, regulatory and legal framework for dealing with social issues.
	FCT	Abuja Environmental Protection Board Act, 1997; EIA Act, National Policy on Environment, etc.	The team indicated that being the Federal Capital Territory, all the federal laws and regulations apply to them. The Nigeria environmental laws, policy and regulatory frameworks are robust. The weaknesses identified are included in the systems analysis in Section V of the report.	The same of for Nigeria – Child Rights Act, Labor Act, National Gender Policy, etc.,	The team indicated that being the Federal Capital Territory, all the federal laws and regulations apply to them. Nigeria has a robust framework (regulatory, legal and policies) regarding social issues. The weaknesses have been identified under Section V of this report.
South West	Ekiti	Environmental Health and Sanitation Law; Ekiti State Environmental	The state has robust framework (legal, regulatory	A law to provide welfare assistance in form of cash	The state has a robust framework (legal,

		Protection Agency Law; Ekiti State Waste Management Authority Law; Prohibition of Cattle and Other Ruminant Grazing in Ekiti State Law.	and policy) for environmental management. The environmental protection agency law empowers the agency to set environmental standards regarding all environmental issues including effluent limitation, water quality, air quality, ozone protection, noise control, discharge of hazardous substances and related offences etc. There law on prohibiting cattle and other ruminants grazing could help deal with a contextual risk regarding farmers and herders' conflict which could prevent the achievement of Result Area 2 of the Nigeria CARES Program.	grants or in-kind assistance to elderly persons No 5 of 2012; Discrimination Against Persons with disability (Prohibition) Law 2020; Ekiti State Child's Rights Law 2006; Ekiti State Citizens' Rights Centre Law 2007; Community and Social Development Agency Law; Ekiti State Gender Based Violence (Prohibition) Law 2019; and Sexual Violence Against Children Law.	regulatory and policy) for dealing with social risks. It covers issues related to GBV, SH, discrimination of persons etc. However, the issue of GRM is not clear.
	Lagos	Ministry of Environment; Environmental Management Protection Law 2017; Lagos State Environment Protection Agency; Environmental (domestic & Industrial Plastic, Rubber and Foam Sector Regulations 2014; Lagos State Environmental (Basic Metal, Iron and Steel, and Metal Products) Regulations 2014; Lagos State Environmental (Non-Metallic Mineral Products) Regulations 2014; Lagos State Environmental (Food, Beverage and Tobacco Industry) Regulations 2014; Lagos State Environmental	Lagos state has a robust environmental management framework with supporting legislations. The Lagos State Environment Protection agency has environmental guidelines for industries and all stakeholders; The guidelines include the writing and submission of EIA, the writing and submission of Environmental Audit report;	Lagos State Special Peoples Law; Lagos State Office for Disability Affairs; a Law to Provide for Protection Against Domestic Violence and Connected Purposes of 18 th May 2007; Domestic and Sexual Violence Response Team (DSVRT); Ministry of Women Affairs and Poverty Alleviation; Ministry of Youth and Social Welfare; Ministry of Wealth Creation and	The approaches and regulations for management of social issues in the State is robust. Combination of geographic and community based targeting (CBT) ensures that those below poverty line are enrolled in CCT; Has legal and institutional means to deal with GBV; has GRM for Cash Transfer project (Mechanism (GRM) is a

		sanitation and waste Control Regulations 2014;		Employment; Childs Right Law 2007;	mechanism designed to address grievances that may arise during any part of the Household Uplifting Program (HUP)); No State documented policy on GRM; DSVRT leads in GBV; secured over 90 convictions of sexual offences in 2019; Community Driven Demand (CDD) mechanism ensures social inclusion;
	Ogun	Ogun State Ministry of Environment; the General Environmental Management (Miscellaneous) Provisions Law 2004; Ogun State Environmental Protection Agency Law 2003; Ogun State Waste Management Law 2020; Ogun State Public Health Law, 2006.	The State has robust legal and regulatory framework for environmental management. The Ministry of Environment issues permits regarding environmental impact study certification, environmental audit approval, environmental management plan approval, emission control certificate etc. The team indicated that the Ministry collaborate with the Federal Ministry of Environment on EIA processes.	framework, Ogun State Community and Social Development Agency.	Ogun State Violence Against Persons (Prohibition) Law made provisions for GBV, SH and sexual exploitation.
	Ondo	State Ministry of Environment, State Environmental Protection Agency Law;	It was reported that the state has its own EIA procedures which are in conformity with the Federal Government; The State issue some permits which include Environmental	No information regarding the social regulatory and institutional framework	

			Impact Assessment Permit, Environmental Management Plan Permit and Environmental Audit Permit;		
	Osun	Ministry of Environment and Sanitation;	The representatives reported that there is a weak platform of relationship between our sector and other state sectors, particularly with the federal Ministry of Environment and National Environmental Standards Regulations and Enforcement Agency (NESREA). The issue of environmental assessment was not covered. We did not cite the staff list and designation of the ministry to determine the capacity to manage environmental issues	Ministry of Women and Children affairs; Gender Equity and Social Inclusion Policy; Ministry of Human Resources and Capacity Building; ministry of Youth and Sports	The representatives reported that Gender Equity and Social Inclusion Policy is to ensure the State a place where women, children, young people and persons with disabilities and all socially excluded groups enjoy equitable opportunities and are protected from all from of abuses, stigmas and violence.
	Oyo	Environmental Sanitation and Waste Control Regulation 2013; Ministry of Environment and Habitat Law 2012;	The State does not have environmental law, but they indicated that they have environmental assessment (EIA) procedure which aligns with that of the Federal Government. The State does not have OHS for industries but some issues relating to enforcement of use of personal protective equipment and placement of signage at strategic locations at their sites are indicated in the Environmental Sanitation and Waste Control Regulation. The	Criminal Justice Law,2006; Violence against Women Law, 2016; Women Affairs Rapid Response Team(RRT); Public Complaint Commission under Ministry of Justice in the State and Oyo State Mediation Centre Law as Amended. The State also promulgated Administration of Criminal Justice Law, 2016. The State domesticated Child's Right Law.	The State indicated that they Collaborate with the Constitutional Officers such as the Nigeria Police, Nigeria Security and Civil Defense Corps (NSCDC) in dealing with GBV. Also, the family Court to adjudicate on matter related to Gender Violence, Rape, Domestic violence and related offences against vulnerable group of people. The state also has a systematic way of

			law also has provision regarding industrial sanitation.		dealing with reported cases of GBV. Generally, the State has institutional mechanisms and procedures for dealing with social issues especially GBV. The administration of criminal justice law aims to facilitate the dispensation of justice in the State.
South East	Abia	Abia State Ministry of Environment; Abia State Environmental Protection Agency (ASEPA); Abia State Basic Environmental Law No 1 2004 Ammended in 2013; Abia State Policy on Environment (2010); Abia Riverine Area Management Policy (2010).	Although the state team claimed that have the laws listed, we did not see any of them to enable us to assess the regulatory and legal systems.	Ministry of Women Affairs & Social Development Gender Based Violence Response Centre in the Ministry of Women Affairs and Social Development Child Right's Law.	They state team indicated that the Violence Against Persons (Prohibition) Bill has been passed by the State House of Assembly waiting assent by the Governor. It is important to note that we did not see any of the legal document the State team reported.
	Anambra	Anambra State Ministry of Environment; Anambra State Waste Management Law, 2015; Public Health Law, Laws of Anambra State 2006; Environmental Health Practice Regulations 2016; Anambra State Forest Law and Regulation 1988; Anambra Public Health Laws 2006.	The team indicated that the ministry of environment is empowered to deal with issues of environmental assessment and that they also collaborate with the Federal Ministry of Environment on EIA issues. However, we did not see the waste management law to determine whether it covers environmental assessment e.g. Environmental Impact Assessment (EIA). We did not cite the staff list and	Ministry of Women and Children Affairs; Violence Against Persons (Prohibition) Law 2017; Anambra State Disabilities Rights Law, 2018; Sexual Assault Referral Centre (SARC)	The State has a good framework for management of GBV, violence against persons and some social issues. The State reported that they have an implementation committee for Violence Against Persons Prohibition Law responsible for Case Management Tracking and Enforcement Actions

			designation of the ministry to determine the capacity to manage environmental issues.		against all forms of Violence Against Persons; The SARC facilitates the treatment of sexually violated persons in the State as well as initiate and follow up with prosecution of offenders and securing justice for the victims.
	Ebonyi	Ebonyi State Environment Protection Law 2015; Ministry of Environment;	Environmental assessment is not clearly defined in the role of the ministry; Weak capacity to manage environmental issues;	Operational Policy to Address Grievance;	Adopted the World Bank procedure and still working on that of the state.
	Enugu	Ministry of Environment and Mineral Resources; Enugu State Waste Management Agency Law; Enugu State Waste Management Agency (ESWAMA); Enugu State Environmental Regulation.	The Ministry of Environment's Pollution and Ecology Departments are responsible for issues related to environmental assessment for example EIA and Environmental audit however, there is no legal backing as it is not stated in the ESWAMA law. The Ministry collaborate with the Federal Ministry of Environment on this.	Ministry of Gender Affairs and Social Development; Enugu State Child's Right Law; Violence Against Persons (Prohibition) Law; Ministry of Labor.	The Ministry of Gender Affairs and Social Development has a department of Social Welfare that is responsible for GRM. The team indicated that the State has a Social Protection Policy which makes provision for inclusiveness for all, however, we did not see the policy.
	Imo	No document regarding environmental legal, regulatory and institutional frameworks.		No document regarding social legal, regulatory and institutional frameworks.	
South-South	Akwa Ibom	Environmental Protection and Waste Management Agency Law; Ministry of Environment and Mineral Resources.	The law is mainly focused on waste management. It does cover environmental assessment e.g. Environmental Impact Assessment (EIA). We	Violence Against Persons Provision Law 2020; Child Rights Law 2008; Law to prohibit certain obnoxious traditional widowhood	The Violence Against Persons Provision Law substantially covers aspects of GBV. We did not notice any labour

			did not cite the staff list and designation of the ministry to determine the capacity to manage environmental issues	practices and rites and for other matters connected therewith; Ministry of Labour and Manpower Planning.	regulation or that relating to Public and Worker Stay, that is, OHS guidelines.
	Bayelsa	Bayelsa State Environmental Sanitation Law 1984; Environmental Sanitation Amendment Law 2013; Ministry of Environment	The environmental laws do not provide for environmental assessments. This is no OHS guidelines for MSE's and other firms. The team indicated that they apply Federal Ministry of Environment legislation and processes regarding environmental assessments. The team indicated that there is weak capacity to enforce environmental laws and regulations.	Bayelsa State Child Right's Law 2016; Community and Social Development Agency Law 2009; Female Genital Mutilation Law 2002; Widow and Widower Law, 2015; Ministry of Women Affairs.	The team observed that the state has a gender policy; Women are also protected on issues with 60% of beneficiaries of Bayelsa Microfinance and Enterprise Development Agency being women. The team indicated that there is weak capacity to enforce social laws and regulations.
	Cross River	State Environmental Protection Agency law, 2004; Environmental Enforcement (Urban Area) law, 2004; Waste Management Agency Law, 2010 and Ministry of Environment; State Policy on Environment	The State has a good institutional framework regarding environmental management however, the coverage regarding environmental assessment is not clear. We did not cite the staff list and designation of the ministry to determine the capacity to manage environmental issues	Law to Prohibit Girl-Child Marriages and Female Circumcision or Genital Mutilation in Cross River State Law No. 2 of 2000; Law to Provide for the Right of a Female to Own and to Inherit Property and for Matters Connected Therein, Law No 4 of 2007; A Law to Prohibit Domestic Violence Against Women and Maltreatment of Widows, Law No 10 of 2004; Cross River State Ministry of Women Affairs; Cross River State	The State has some laws to deal with issues of gender and gender based violence. We did not notice any guidelines or policy relating to Public and Worker Stay.

				Gender Policy and Strategy Implementation Framework 2019-2023;	
	Delta	Ministry of Environment; Delta State Forestry Law; Delta State Environmental Sanitation Law 1986; Ecology Law, 2006; Delta State Waste Management Law, 2004; Issues Environmental Impact Statement Permit; Sewage permit; pest and vector control (fumigation) permit.	The State has good institutional framework regarding environmental management including environmental assessments. There is increasing shortage of requisite manpower; The Ministry of Environmental has OHS guideline that applies to the ministry. There is no OHS guideline for MSEs in the state.	Ministry of Women Affairs, Community and Social Development; A law to establish the Delta State multi-door courthouse and for other connected matters, 2012 (for alternative dispute resolution); A law to establish the office of the public defender its functions and for other matter connected to it, 2018; A bill for a law to protect persons against violence has not been passed into law.	The state has a robust framework for dealing with social issues especially grievance redress mechanism. On GBV, the Ministry of Women Affairs, Community and Social Development collects information and transfer to the Ministry of Justice. This may not be effective as there a need for rapid response in dealing with GBV cases.
	Edo	Edo State Sanitation and Pollution Management Law – Law No 5 of 2010; Edo State Ministry of Environment;	Edo State Sanitation and Pollution Management Law has provision for EIA although it has some weaknesses. It is not clear to different types of development projects which EIA will apply; the provision further implies that development project proponents will conduct two EIAs, one for the Federal and one for the State.	Ministry of Social Development and Gender Issues; Violence Against Persons Prohibition Law of Edo State 2019; Edo State Trafficking in Persons Prohibition Law 2018; Law against Widowhood Practices in Edo State; Edo State Task Force Against Human Trafficking (ETAHT); Edo State Child Rights Law 2007, and Edo State Child Protection Policy.	Edo State has good framework for management of some social issues especially GBV and human trafficking. However, Edo State has no gender policy. the existing agencies responsible for gender issues do not possess adequate technical expertise to address some of the social and economic hindrances that inhibit women and girls’ economic and social

					development equal to that of men and boys.
	Rivers	No document regarding environmental legal, regulatory and institutional frameworks.		No document regarding social legal, regulatory and institutional frameworks.	

Annex 7: Consultation Plan for Nigeria CARES PforR (Consultation with State Representatives)

Purpose of the Consultation: – to listen and understand the environmental and social systems in all the states involved in the Nigeria CARES PforR, discuss their concerns and potential environmental and social issues regarding the proposed project and collaboratively provide mitigating solutions that will inform the design of the project in order to achieve the project development objective.

Method: the consultation will be virtual through Webex or Zoom. Participants will receive the questions and discussion points and list of required documents ahead of time so that they will be prepared for the engagement.

Proposed Schedule

North East and North West Zones – Thursday July 14, 2020

North Central and South West Zones - Friday July 15, 2020

South East and South –South Zones – Monday July 16, 2020

Note: Given the large number of people that will be involved, the consultation may be organised for each geopolitical zone.

Proposed Time – 12-2pm, 3-5pm each day

Proposed State Ministries and Agencies that will be Involved

1. Ministry of Environment
2. Ministry of gender Affairs and Social Development
3. Ministry of Labour (if existing in the state)
4. The three agencies that will be hosting the project in the States- FADAMA, CSDP, GEEP, BOI and state ministry of commerce and industry

Participants- We expect one representative each from these ministries and agencies, if possible, the head of the ministries and agencies and state coordinators of the Nigeria Cares PforR should attend.

Questions and Discussion Points during the Consultation and Interaction regarding Nigeria Cares PforR

1. Functions & responsibilities, duties, mandate, Capacities to deal with environmental and social issues including assessments, etc. What are your legal and regulatory powers? What permits & licenses do you issue (for example for ministry of environment, land, investment promotion)? Interaction and coordination between Federal & State bodies, complementary & competing roles.

2. Enforcement & prosecutions – what are your powers, how effective are they? Have you ever taken action against defaulters of environmental regulations, environmental and social assessment practices in projects and infrastructure development, persons involved in gender violence e.g. Rape/assault etc – give examples?
3. Policies and strategic role – objectives, documents, action plans, etc., particularly with respect to relationship with industries and private sector.
4. Staffing and facilities to perform functions – how many, organisation, training, general level of environmental & social awareness. Constraints & limitations.
5. How are public complaints channelled to them, and what is the process for handling & resolving them?
6. For Ministry of Environment - Do you have any “state of the environment” or baseline studies for the State – current environmental conditions, environmental quality, land use, vegetation, water resource? Do you have environment, health and safety guidelines for different industrial cluster in the state? What is the collaboration with other MDAs like the forestry department and the Waste Management Authority? What are their mandates within the broader state ministry of environment agenda? What are the relevant State Environmental and Social Standard’s policies, laws, edicts and act for mitigating risk and impacts that can result from projects? Who/which agency/entity is responsible for their enforcement? How is the enforcement regime like? What are the constraints etc and how can the identified constraints be addressed?
7. What are the state policies on gender, disability and gender-based violence in the state and the state plans in addressing them?

Documents we expect from the States (if available)

1. Documents indicating the profile of the Ministries and Agencies, showing their mandate, organization, department, roles and staffing, etc.
2. Laws, Regulations and Policy Documents governing environmental management and Gender administration and labour issues in the State.
3. Policy documents regarding Social Safety Programs in the State.
4. Policy documents regarding grievance redress mechanisms, management of gender-based violence, labour issues, if available.

Annex 8: Nigeria CARES Environmental and Social Consultation Notes (Consultation with State Representatives)

Item	Description
Name of Area where presentation was conducted	<p>Online Virtual Meeting via Microsoft Teams with the stakeholders of Nigeria CARES Project:</p> <p>Batch A: North East and North West Zones (Adamawa, Bauchi, Borno, Yobe, Gombe, Taraba, Jigawa, Kaduna, Kano, Katsina, Sokoto, Kebbi and Zamfara)</p> <p>Batch B: North Central and South West Zones (Benue, Kogi, Kwara, Nasarawa, Niger, Plateau, FCT, Ekiti, Lagos, Ogun, Ondo, Osun and Oyo)</p> <p>Batch C: South East and South –South Zones (Abia, Anambra, Ebonyi, Enugu, Imo, Akwa-ibom, Bayelsa, Cross River, Delta, Edo and Rivers)</p>
Dates	<p>July 14, 2020 – Batch A</p> <p>July 15, 2020 – Batch B</p> <p>July 16, 2020 – Batch C</p>
Language of Communication	English
Summary of Matters Discussed	
Opening Remarks	A brief overview of the proposed project was presented, and the purpose of the consultation was introduced to the stakeholders at the consultation meeting by the Nigeria CARES team lead from the world bank.
Questions to stakeholders	Stakeholder Responses
	Batch A:
<p>RA.1. Increased cash, basic services, and livelihood support to poor and vulnerable households</p> <p>Key Questions</p> <ul style="list-style-type: none"> Do you have specific procedure, guideline, regulation or legislation through which you ensure that vulnerable/marginalized individuals, for example 	<p>Adamawa: Using their social register and guidelines, there is a system in place to ensure only the vulnerable benefit from cash transfers. The guidelines would be shared with the Bank later.</p> <p>Bauchi: The state has processes and procedures to ensure elite capture, however, CSDP does not handle cash transfers, but they have grievance redress mechanisms and conflict resolution committees at local levels. Gender Based Violence (GBV) complaints are directed to</p>

<p>women, youths, people living with disabilities etc., are not marginalized in cash transfers, basic services and livelihood support.</p> <ul style="list-style-type: none"> ● Do you have a procedure, guideline, regulation and legislation to ensure that elites do not take over or hijack the cash transfer, basic services, etc., to the detriment of those that need it/who are in the register? ● Do you have a procedure, regulation or legislation for addressing gender-based violence? Can you give an example of how you handled this in the past? ● Do you have a framework, procedure, legislation or regulation on how grievances are redressed? Can marginalized people or those who feel that they were neglected or shortchanged have a means for reporting their grievance? Do you have a mechanism to address the issues to the satisfaction of the complainants? Can you give an example of how you handled this in the past? 	<p>appropriate mapped NGOs or government agencies for redress. Documentation on these procedures would be sent later.</p> <p>Borno: <i>No response was captured on this.</i></p> <p>Gombe: The state has specific guidelines to ensure that vulnerable/marginalized individuals are not marginalized and those that ensure there is no elite hijacking of support; the social register is to be followed and policies and guidelines outline how livelihood support is to be distributed. The CSDP has never had an experience with GBV, but there are structures in place to adequately address GBV issues under the Ministry of Women Affairs and Social Development. There are conflict resolutions mechanisms in place, and these are handled by the communities at group and community level. The local government review committee address these at the local government level. There are also hotlines to address issues at the agency level.</p> <p>Jigawa: <i>No response was captured on this.</i></p> <p>Kaduna: The state has specific guidelines to ensure that vulnerable/marginalized individuals are not marginalized and those that ensure there is no elite hijacking of support; the social register is linked directly to the local government and community areas. There are several laws handled by the Ministry of Women Affairs (gender equity, social equity laws, etc.) which address GBV. GRMs exist from the ground level to the State level.</p> <p>Kano: The state possesses the same guidelines as that of Kaduna state and these would be shared with the Bank later. GRMs are also from local to State levels and the Ministry of Women Affairs handles these cases.</p> <p>Katsina: The state has an EIA process and environmental laws in place; same as Kaduna state.</p>
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	<p>Kebbi: <i>No response was captured on this.</i></p> <p>Sokoto: <i>No response was captured on this.</i></p> <p>Taraba: The state has environmental laws in place with guidelines to ensure that there is no hijacking of support by the elite. There are currently no legal measures against GBV, but the Ministry of Women Affairs handles such issues directly with the use of member agencies. Documentation on all these would be sent later.</p> <p>Yobe: There are laid out guidelines regarding environment. The CSDP have rules and regulations for environmental effects and possible impacts to properly represent women and have 35-40% inclusion rate in those programs. The state also has poverty mapping for those communities to check issues of cash transfers and livelihood support. Documentation on this would be sent later along with GBV regulations and programs currently in implementation to address victims of GBV.</p> <p>Zamfara: <i>No response was captured on this.</i></p>
	<p>Batch B:</p>
	<p>Benue The state has environmental laws in place with guidelines to ensure that there is no hijacking of support by the elite. There are also GBV counselling centres in Makurdi which are directly supervised by the Ministry of Women Affairs. Documentation on all these would be sent later.</p> <p>Ekiti There are social protection laws in the state to guard against marginalisation with some other laws in progress. The single register is followed using the World Bank guidelines as most projects are regulated, this is handled directly by the state from the community</p>

	<p>level using the state’s GRMs. Women are covered under the vulnerable group desk through the communities to the state. They have a 30% inclusion rate for women in all programs.</p> <p>FCT <i>No response was captured on this.</i></p> <p>Kogi CSDP responded saying they have specific procedure and guidelines to ensure that vulnerable/marginalized individuals are not marginalized in cash transfers, basic services and livelihood support. There are also GRM processes, which are undergoing adjustment to align with the state’s GRM process. They have a procedure for addressing gender-based violence and they have a child protection policy, but the gender bill is still at the legislature stage. Further documentation would be sent later.</p> <p>Kwara There are policies and systems in place to protect the interest of vulnerable groups and SDGs. There is also a GRM system to address complaints on livelihood support, synchronised with the state framework. GBV area offices referred to as ‘Welfare Centres’ are present in the state to address such matters. However, there are currently no legal procedures in the state as those are yet to be enacted. The state also has a child’s rights law but is yet to fully implement it. There are procedures and laws in place to address child labour, they also have the social register to follow the state’s process for grievance redress.</p> <p>Lagos The state raised that for marginalization it is more on the fault of the Federal Government, were the registers are usually filled but only half of the vulnerable people are accounted for. The state’s cash transfer process has a regimentation and it ensures that the elite would not be able to do that because of the nature of the registration process. There is a strong law against all forms of discrimination and there are agencies present to sort all issues regarding GBV, there are also the grievance redress officers comprising members of the Ministry of Justice.</p>
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	<p>Nasarawa For marginalised individuals, there are group development projects to deal with psychosocial issues, which is supervised by CSDP and backed up by law. There are also guidelines and procedures to prevent against elite capture and protect child rights. There are also GRMs to deal with those issues/complaints. The responsible ministry conducts surveys to ensure there are no issues on sites before commencing land acquisition under FADAMA, the process adopted is the same as the Land Use Act. Procedures for women and youth involvement are also in place.</p> <p>Niger There is the child rights law in the state with a draft prohibition law on GBV. There are currently gender desk officers to address grievances and to ensure alignment with policies and procedures regarding gender issues, there is also the gender law present. Further documentation would be sent later.</p> <p>Ogun To ensure non-discrimination, three out of eight members of the community beneficiaries must be women and there are guidelines set to ensure there is no elite capture; there is a register to engage only those community members who need support.</p> <p>Ondo The state has laws for social protection and protection of vulnerable groups. There are also GRMs in place for all issues that may arise, the steering committee handles these grievances, however there are no mechanisms at the local levels. The state uses community-based targeting to form their social register to protect against GBV. Their social protection laws and guidelines to protect these vulnerable groups and the state has domesticated the child rights law.</p> <p>Osun There are social protection laws in the state provided by UNICEF and the social register scheme, supported by the World Bank, is in use. There are agencies in place to as much as possible resolve issues/complaints before they become legal issues, but there is also provision for</p>
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	<p>litigation if it escalates that far. The state has passed the child rights law and have a strong law against GBV. Women inclusion is also ensured to benefit from livelihood support.</p> <p>Oyo The state has the child rights law and labour laws as well as the Violence Against Women law. They also ensure proper inclusion of women in support programs. They have measures in place to address grievances and issues which are directly handled by a board comprising of members of the Ministry of Justice. There are processes in place to ensure that there is no discrimination and there are mitigation measures against GBV. Documentation of all this would be sent later.</p> <p>Plateau The CSDA responded saying they have specific procedure and guidelines to ensure that vulnerable/marginalized individuals are not marginalized in cash transfers, basic services and livelihood support with measures to ensure that there is no elite capture or hijacking and regulations to address GBV under the Ministry of Women Affairs. The state has also signed the child rights act which also guards against child labor. There are procedures on grievance redress which align with the Ministry of Justice.</p> <p>Batch C:</p> <p>Abia The state has specific procedure and guidelines to ensure that individuals are not marginalized and that elites do not take over or hijack the livelihood support as well as procedures to guard against GBV and address grievances, all which follow the procedure of project implementation in the state. Documentation on this would be provided later.</p> <p>Akwa-ibom The state has specific procedure and guidelines to ensure that individuals are not marginalized and that elites do not take over or hijack the livelihood support. There are child rights, social inclusion laws and other policies to ensure there is no marginalization.</p>
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	<p>Anambra The state has specific procedure and guidelines to ensure that individuals are not marginalized, through the Ministry of Women Affairs and Social Development, and that elites do not take over or hijack the livelihood support as well as procedures to guard against GBV.</p> <p>Bayelsa The procedures and guidelines followed regarding marginalisation and elite capture are the same as in Abia state and other states. The state has adopted the National Gender Policy which covers most vulnerable groups. They also have methods of addressing grievances and regarding land acquisition, they go through the court procedure as well as use community donation of land.</p> <p>Cross River The state has specific procedure and guidelines to ensure that individuals are not marginalized and that elites do not take over or hijack the livelihood support as well as procedures to guard against GBV and address grievances through the Bureau of Public Service.</p> <p>Delta Environment and gender laws are in place as well as procedures for addressing marginalization, elite capture and GBV through community desk officers. The state has domesticated the National Gender Policy for grievance redress in conjunction with the Ministry of Justice.</p> <p>Ebonyi The procedures and guidelines followed regarding this result area are the same as in Abia state.</p> <p>Edo The procedures and guidelines followed regarding this result area are the same as in Akwa Ibom and Cross River states, grievances and redressed through inter agencies with a committee formed from the Ministry of Justice. There are several laws on GBV, and marginalization and National laws have been domesticated, though the gender policy is still under review. There are also sexual assault response centres in partnership with ROLAC to address victims of GBV, a</p>
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	<p>register on sexual offenders is also being compiled. Further documentation on this would be sent later.</p> <p>Enugu <i>No response was captured on this.</i></p> <p>Imo <i>No response was captured on this.</i></p> <p>Rivers The procedures and guidelines followed regarding this result area are the same as in other states.</p>
<p>RA. 2. Increasing food security and safe functioning of food supply chains for poor households</p> <p>Key Questions</p> <ul style="list-style-type: none"> ● Do you have an environmental law and regulation in your state? ● Does the law and regulation contain environmental assessment requirement for projects and procedure for carrying it out? ● Do you have an EIA process in your state, or do you follow that of the Federal Government? ● If you have, how do you resolved conflicts arising from the implementation of both systems? ● Do you have labor law in your state? If yes, does it cover the issues of child labor? Have dealt with child labor issues in the past? ● Do you have OHS standards for industries, companies and contractors operating in your state? If yes, what are the means of enforcement? Do have experience in this, give example? 	<p>Batch A:</p> <p>Adamawa: There are laws governing those environmental and social concerns. For GBV, there are centres for reporting referred to as ‘Hope Centres’ where medical services, legal services, etc. can be accessed by victims of GBV. Child rights are yet to be passed but are currently in the pipeline.</p> <p>Bauchi: Environmental regulatory practices are vested in the government. EIA follows the Federal government process and this is a reflection of the state’s process for project implementation. Conflicts are settled at the community level, which has an environmental officer there for beneficiaries that have been supported to handle cases like that.</p> <p>Borno: <i>No response was captured on this.</i></p> <p>Gombe: There are currently labour laws in the state for environment and Occupational Health and Safety (OHS), but these are still in legislation.</p> <p>Jigawa: <i>No response was captured on this.</i></p> <p>Kaduna:</p>

<ul style="list-style-type: none"> • Has the state domiciled or have a child's right law? 	<p>OHS standards exist and are present in the state along with child rights and labour laws.</p> <p>Kano: <i>No response was captured on this.</i></p> <p>Katsina: The state has an EIA process and environmental laws in place; same as Kaduna state. They also have labour and child rights laws.</p> <p>Kebbi: <i>No response was captured on this.</i></p> <p>Sokoto: <i>No response was captured on this.</i></p> <p>Taraba: The state has an EIA process as well as labour laws in the state. Issues of labour and child rights are handled by the Ministry of Social Affairs.</p> <p>Yobe: The state has environmental laws and regulations which contain environmental assessment requirement for projects and the procedure for carrying this out. There is also an EIA process which liaises with the Ministry of Environment and is the same with the Federal EIA process which includes OHS. Complaints are resolved via use of phone lines for complaints which are coordinated by follow-up agencies. Labour laws exist but are currently still under review by the legislature.</p> <p>Zamfara: The state has a draft of a child rights act. Issues of GBV are handled by a separate ministry and documentation on this would be shared later.</p>
	<p>Batch B:</p>
	<p>Benue They have the child rights laws in the state. The EIA process follows state and federal process. Under FADAMA there are GRMs in tandem with the state's process and OHS is also managed with the use of their environmental and social officers, the system also</p>

	<p>follows the state and World Bank guidelines. Documentation on these policies have been sent.</p> <p>Ekiti The EIA system is the same as the Federal Ministry of Environment guidelines and this take into consideration; OHS, GBV and child labour. Wet markets are owned by the local government and potential beneficiaries of the community state their needs to work together with the local government to acquire land.</p> <p>FCT <i>No response was captured on this.</i></p> <p>Kogi Land acquisition under FADAMA is done through community regals and all grievance redresses are done through the community. The state also has a waste management centre which takes stream from the Ministry of Environment. They also have the Head of Herders on the board for grievance redress at the local level.</p> <p>Kwara The system for environmental and social policies and regulations are in place there are also OHS measures. The process for addressing livelihood concerns from land acquisition are also present in FADAMA and all follow the Land Use Act process. Environmental laws and regulations exist in the state and this follows the Federal EIA process, however this is undergoing domestication to include OHS and labour laws. This documentation would be sent later.</p> <p>Lagos Laws and regulation and present in the state. EIA processes are also present according to the law of environmental assessment, Which is also derived from the state and Federal laws. There are hardly any grievance redress issues that persist in the state. There is no confirmation of a child rights law existing, but child exploitation is kicked against and labour laws exist in the state. FADAMA operations follow the World Bank standards in tandem with the Lagos state environmental law.</p>
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	<p>Nasarawa EIA policy in the state is adopted from the Federal government. Regarding GBV, in certain areas of the state women are not allowed to work on lands to avoid potential GBV risks. The NASEPA is responsible for waste management as well as other agents also collaborating with NEWMAP on waste management, there are policies on this as well.</p> <p>Niger <i>No response was captured on this.</i></p> <p>Ogun The procedures and guidelines under this result area are same as Nasarawa, Benue and Lagos and are in compliance with the World Bank standards and state local government laws.</p> <p>Ondo Under FADAMA livestock farmers are advised to input environmental and social measures to guard against adverse environmental effects and incorporate these practices in their business plan. The EIA process takes into consideration waste management, which is the same for Lagos and other states.</p> <p>Osun The state has specific procedure and guidelines to ensure that vulnerable/marginalized individuals are not marginalized in livelihood support and ensure there is no elite capture or hijacking. They also have procedures to address GBV. Environmental and social audits are done in the state which covers OHS as well, and the EIA process is the same as the Federal Government's process. There is a labor law separate from the environmental law which covers waste management. Documentation on this would be sent later.</p> <p>Oyo The state has an EIA process and environmental protection procedures which is in accordance with the state and national environment laws and waste management laws.</p> <p>Plateau</p>
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	<p>Land acquisition in FADAMA is done by community donation and not acquisition with a signed MOU with the project for evidence. Grievance redress is carried out at group and community level, there are also procedures for OHS.</p>
	<p>Batch C:</p>
	<p>Abia There are environmental regulations in the state which includes environmental assessment requirement for projects as well as an EIA process that is adopted from the Federal process. There are labour laws which cover child labour and the GBV law, an Act from 2011 and 2019, are in existence. There are also waste management laws and regulations and land issues are settled at community level.</p> <p>Akwa-ibom The procedures under this result area are the same as for Abia and Anambra, with the use of community land system. There are also procedures for redressing grievances in those areas.</p> <p>Anambra There are environmental laws and assessment requirements for projects in the state as well as an EIA process though these may be specific to FADAMA project but similar to Abia state. The state has a policy regarding GBV and the child rights law. Further documentation on this would be sent later.</p> <p>Bayelsa <i>No response was captured on this.</i></p> <p>Cross River There are environmental laws and assessment requirements for projects in the state as well as an EIA process for environmental and social management framework.</p> <p>Delta There are environmental and gender laws in place with the enforcement of a 30% inclusion rate for women.</p>

	<p>Ebonyi They have a policy on gender with an agency to support SMEs, they also have procedures to ensure there is no marginalisation of women and environmental standards for these SMEs.</p> <p>Edo Most policies are in line with the World Bank policies and guidelines. The EIA process has been stepped up in its policies to align with the World Bank’s prescriptions. Waste management systems are currently via dump site use, but they are currently exploring Waste to Wealth management methods</p> <p>Enugu <i>No response was captured on this.</i></p> <p>Imo <i>No response was captured on this.</i></p> <p>Rivers The state has the child rights act and violence against people’s act to protect</p>
<p>RA. 3. Facilitating Recovery and Enhancing Capabilities of MSEs</p> <p>Key Questions</p> <ul style="list-style-type: none"> ● Do you have a law and policy on Gender? ● Do you have a small and medium scale enterprises agency in the state? ● Do you have a procedure to ensure that women are not marginalized in allocation of resources in the agency? ● Do you have environmental standards and OHS procedures for Medium and Small-scale Enterprises? ● Do you have capacity to enforce environmental and social regulations and laws for MSEs? 	<p>Batch A</p> <p>Adamawa: The Poverty Alleviation office deals with these issues, however, there are no gender specific laws in place, but the state does put gender into consideration in program implementation with 40% inclusion of women in all programs.</p> <p>Bauchi: <i>No response was captured on this.</i></p> <p>Borno: <i>No response was captured on this.</i></p> <p>Gombe: The Ministry of Trade, Investment and Tourism gives priority to women. OHS procedures for SMEs are still under implementation, but cash transfers have programs in place for these. Documentation on these would be shared later.</p>

	<p>Jigawa: <i>No response was captured on this.</i></p> <p>Kaduna: The condition of the state aligns with that of Yobe state.</p> <p>Kano: The Ministry of Commerce and Industry handles issues related to SMEs. They have the same guidelines as Kaduna state; several policies and guidelines enforced and implemented; however, these are still under review by the legislature.</p> <p>Katsina: The state has three agencies which regulate SMEs.</p> <p>Kebbi: <i>No response was captured on this.</i></p> <p>Sokoto: <i>No response was captured on this.</i></p> <p>Taraba: <i>No response was captured on this.</i></p> <p>Yobe: For Small and Medium scale enterprises (SMEs) the state has been working with Banks of Industries to assist them, especially in these times of the COVID-19 pandemic. There are currently no environmental standards nor OHS procedures for SMEs. The state is currently using GEEP as well as trade agents to capture beneficiaries for petty trade. Documentation on these would be sent later.</p> <p>Zamfara: <i>No response was captured on this</i></p>
	<p>Batch B:</p>
	<p>Benue Special aids of the government supervise these, and a platform is still upcoming on this for a dedicated platform but the national policy on OHS has been</p>

	<p>adopted in the state. Documentation on this would be sent later.</p> <p>Ekiti There is an agency for SMEs which has procedures and guidelines in accordance with Federal law. Women are given an inclusion percentage of 50% to ensure this and environmental, social and OHS guidelines are adhered to.</p> <p>FCT <i>No response was captured on this.</i></p> <p>Kogi There is an agency established for management of SMEs; Kogi Enterprise Development Agency, under the Ministry of Trade. They have procedures to ensure that women are not marginalized which are all backed by law as well as environmental standards in aided by the Ministry of Environment. Further documentation on these would be sent later.</p> <p>Kwara <i>No response was captured on this.</i></p> <p>Lagos The LSEIF coordinate projects targeting SMEs and ensure that women are not marginalised, and beneficiaries follow environmental guidelines set by Lagos government.</p> <p>Nasarawa There is a non-discrimination policy on all government projects. There is also a register of small businesses for documentation. Environmental impact of these businesses is of paramount concern and efforts are made to ensure their effects are minimal. Documentation on this would be sent later.</p> <p>Niger <i>No response was captured on this.</i></p> <p>Ogun Women are given equal opportunity regarding allocation of resources. They also have environmental laws and enforce those adequately. They have an agency for SMEs supervised by the Ministry of Industry, Trade</p>
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	<p>and Investment, which has a regulation of 35% inclusion of women.</p> <p>Ondo There are gender-based laws that protect inclusion for vulnerable groups to ensure women are not marginalized. These practices align with the state environmental protection laws with sufficient capacity to enforce this. Documentation on these would be sent later.</p> <p>Osun There is a Gender Equity and Social Inclusion (GESI) policy to include all groups that are to be possible beneficiaries to certain projects. There is also a job centre in the state to gather labour and facilitate SMEs.</p> <p>Oyo There is a policy that guides gender distribution and ensures women are not marginalised. There is also an SME agency in the state for this purpose. Further documentation on this would be sent later.</p> <p>Plateau The state has a law and policy on gender under the Ministry of Commerce. Further documentation on this result area would be sent later.</p> <p>Batch C:</p>
	<p>Abia There is a policy on gender and a state ministry for SMEs. There are also regulations in place to ensure there is no marginalisation of women, one project even adopted a 60% inclusion rate for women. There is also capacity to enforce these environmental and social regulations for SMEs are followed by the GEEP office.</p> <p>Akwa-ibom There are state gender policies regarding SMEs, but no specific laws passed to support SME agencies, but there are some agencies that may work towards that.</p> <p>Anambra There is a gender policy in the state.</p>

	<p>Bayelsa The state has a gender policy and an agency responsible for SMEs support. The National policy on gender marginalisation has been adopted and there are environmental standards and OHS procedures for SMEs supervised by specialist agencies and the Ministry of Environment and NAFDAC have periodic check ins.</p> <p>Cross River There is an agency for SMEs which is established by MEDA, they also have micro community enterprising with policies and laws to regulate these SMEs. They have regulations to guard against marginalisation as well as environmental standards and OHS procedures for SMEs.</p> <p>Delta The state has procedures to ensure that women are not marginalized following guidelines of the state and the World Bank, with an enforcement of 60% inclusion of women.</p> <p>Ebonyi They have an agency in the state to support SMEs, but there is no GEEP in the state.</p> <p>Edo The state has several agencies that foster support to SMEs in specified capacities.</p> <p>Enugu <i>No response was captured on this.</i></p> <p>Imo <i>No response was captured on this.</i></p> <p>Rivers The state has several agencies to support SMEs and procedures to ensure that women are not marginalized in allocation of resources.</p>
Perceptions about the Project	The representatives were pleased with the presentation of the program.
Recommendations and Remarks	Generally, the consultations process was a success.

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Annex 10: Nigeria CARES Environmental and Social Consultation Notes (Consultation with Farmers (FADAMA Beneficiaries and Non-Beneficiaries))

Item	Description
Name of Area where presentation was conducted	<p>Online Virtual Meeting via Microsoft Teams with the stakeholders of Nigeria CARES Project:</p> <p>North East and North West Zones (Adamawa, Bauchi, Borno, Yobe, Gombe, Taraba, Jigawa, Kaduna, Kano, Katsina, Sokoto, Kebbi and Zamfara)</p> <p>North Central and South West Zones (Benue, Kogi, Kwara, Nasarawa, Niger, Plateau, FCT, Ekiti, Lagos, Ogun, Ondo, Osun and Oyo)</p> <p>South East and South –South Zones (Abia, Anambra, Ebonyi, Enugu, Imo, Akwa-ibom, Bayelsa, Cross River, Delta, Edo and Rivers)</p>
Dates	August 4, 2020
Language of Communication	English
Summary of Matters Discussed	
Opening Remarks	A brief overview of the proposed project was presented, and the purpose of the consultation was introduced to the stakeholders at the consultation meeting by the Nigeria CARES team lead from the world bank.
Questions to stakeholders	Stakeholder Responses
<ol style="list-style-type: none"> 1. What projects did you carryout based on the benefits you received from FADAMA III? <ol style="list-style-type: none"> a. 2. Did you experience hitches in the disbursement of funds/other benefits? 3. Are you aware of any grievance redress mechanism regarding FADAMA III project in your 	<p>North East and North West Zones:</p> <p>Adamawa: There have been few issues but we were able to go back and resolve them internally. There are no records of sexual harassment under FADAMA. Environmental assessments are carried out to check these with use of a checklist under the project. FADAMA has enlightened and uplifted the women in the state and helped in providing for their families. The farmers received training concerning pest management; pesticides are used on farms with face masks, boots and gloves for application. Some chemicals are also used to preserve crops.</p> <p>Bauchi: There were no experiences with hitches on disbursements, except for some relating to incomplete documentation. Assessments were done on environmental impact. FADAMA assisted the farmers with issues of crop infestation as well.</p>

<p>state?</p> <p>4. Did you or any many of group complain to the FADAMA III project office about any grievance you had regarding the project?</p> <p>5. If you complained or any of your group members complained, was the issue resolved, and were you satisfied with the way it was resolved?</p> <p>6. For the specific project you carried out especially animal husbandry and food processing, for example poultry or piggery project, did you conduct any environmental assessment or environmental audit?</p> <p>7. In your own knowledge, was environmental assessment a prerequisite for disbursement of funds to beneficiaries?</p> <p>8. During the course</p>	<p>Waste management is also done by farmers through channelling waste water from ponds to specific economic crop gardens. They also have pest management methods in place. There have been no experiences with sexual harassment in the state. Women would like more inclusion in the state as most beneficiaries are men.</p> <p>Borno: <i>Not available to respond</i></p> <p>Gombe: Beneficiaries got agro processing equipment and gain skills for small trade. The procurement committees ensure equipment are properly and timely procured so that no hitches are experienced. Environmental assessments are carried out to mitigate pollution and after this audit, inspections are done to ensure that methods are enforced. There have been no sexual harassment cases nor GBV experiences. The farmers suggested provision of funding for women under FADAMA and involving more women across board.</p> <p>Jigawa: The farmers got agro processing equipment and trainings for these trade groups. No GBV or harassment was experienced under FADAMA. Women participate in a 30% ratio, and would like to increase on this to 40 – 50% if possible. Pest management is handled with supervision of FADAMA team. The farmers would like value addition in rice processing and nutrition knowledge in the state. Grievance redress is handled directly by FADAMA offices. Waste management is done by recycling of husks and sale of same. Waste water is also disposed in holes with engine oil to prevent mosquito growth.</p> <p>Kaduna: Rice production was carried out under the project. Disbursements are done properly and promptly. There are GRMs through reconciliation committee. No grievance was experienced with the Kaduna team. All complaints are attended to satisfactorily. Environmental assessment audits are carried out. There were no experiences with negative treatment for women. Women would like more inclusion and provision of sources of water and housing for poultry and pigs. Environmental assessment was a prerequisite.</p> <p>Kano:</p>
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<p>of your project, did you take any precaution regarding environmental management?</p> <p>9. For women- did you receive any negative treatment from FADAMA III project office because you are a woman?</p> <p>10. Were you ever been sexually harassed by anyone connected to FADAMA III project during the period you were involved in the project?</p> <p>11. Have you ever been threatened by any staff of FADAMA III project office or Ministry of Agriculture because you refused to oblige his or her sexual advances?</p> <p>12. Has any staff of FADAMA III project office touched without your consent or made any unsolicited sexual advances?</p>	<p>Projects were carried out under FADAMA and no hitches were experienced with disbursements. There was no negative treatment of women no sexual harassment of them.</p> <p>Katsina: Projects were carried out under FADAMA. There were no hitches in disbursements. There have been no grievances, and any brought to the attention of the team are attended to. Environmental assessments were carried out. There are no negative treatments nor harassment of women. They would like more inclusion of women as well as community participation and inclusion of those with disabilities. Non-participating farmers would like to participate now.</p> <p>Kebbi: The farmers engaged in rice production with agro processing equipment. Environmental assessment is a requirement for the project. More awareness needs to be raised to sensitize people in the state about the project.</p> <p>Sokoto: Not many issues were experienced. Any grievances are communicated and resolved in a timely manner. GRMs are in place and women inclusive. No experiences with GBV. They would like the project to have more inclusion of those with disabilities as well as enlargement of farming scope e.g. Crocodile farming.</p> <p>Taraba: All equipment required for women were provided for and they received a lot of training for their businesses. They would like to have more inclusion of women in the state as it is generally perceived as a male project. There is also the issue of contribution under the project that discourages the people from participating. No sexual harassment has been experienced. Questions 1, 2 and 3 are the same as in Adamawa state, there are also GRMs in place and measures for pest management. Environmental assessments are carried out as a requirement for disbursement</p> <p>Yobe: No case of GBV has been experienced. Beneficiaries have been enlightened on agro processing as a group and are able to generate income with that. Environmental assessments are carried out via committees in each LGA. There are also</p>
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	<p>measures in place regarding noise management. The team also has a functional GRM system.</p> <p>Zamfara: Projects were carried out under FADAMA. There were no hitches in disbursements. There have been no grievances, and any brought to the attention of the team are attended to. Environmental assessments were carried out. There are no negative treatments nor harassment of women. Husk wastes are sold as feed to herders. GBV issues were not experienced. They would like more women to be involved especially for cottage industries.</p> <hr/> <p>North Central and South West Zones:</p> <p>Benue: Animal husbandry was carried out as well as crop production and grants were given for 5 market stalls. No issues were experienced with disbursements. GRMs exist on all levels. Women are adequately encouraged under FADAMA. Waste management; bird faeces are sold to farmers as fertilizer.</p> <p>Ekiti: Projects were carried out under FADAMA. There were no hitches in disbursements. There have been no grievances, and any brought to the attention of the team are attended to. Environmental assessments were carried out. There are no negative treatments nor harassment of women. Waste management is done by draining waste water from fufu production directly into soak-aways to contain the smell. They suggest more support of those having health issues especially those living with HIV as well as those who are disabled.</p> <p>FCT: Same as other states. People with disability are included. Conflict is resolved at all levels. Environmental assessment is a prerequisite. Suggest more youth inclusion. Recycling and resale are carried out under waste management; feed bags are recycled and resold to dealers while faeces are sold as fertilizer to manage waste.</p> <p>Kogi: Environmental assessment is done. Conflicts are resolved by committees present. Disbursements are done timely. No sexual harassment nor discrimination by gender. Suggested increased women inclusion and awareness.</p>
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	<p>Kwara: No conflict nor harassment. Environmental assessment is a requirement. No gender discrimination. The farmers suggested that there be more funding and inclusion of widow groups and people with disabilities.</p> <p>Lagos: They engaged in vegetable production. There have been no hitches regarding disbursements, but they would like a reduction in the bureaucracy for documentation to meet up with time. Conflict management committees are on ground. They suggest doing more sensitization in the state and inclusion of even more women. Insurance is also to be done in the state on produce. Marketing chain needs to be improved on in the state. Waste management through sale of waste to fish farmers. Some produce was also given as palliatives.</p> <p>Nasarawa: <i>Not available to respond</i></p> <p>Niger: Same as Taraba state.</p> <p>Ogun: They engaged in cassava production. Hitches were experienced with the state government when there was non-payment of counterpart fund, but this was later resolved. GRMs are present from local to state levels. In Ogun, it is found that more women prefer to trade over farming. More sensitization is necessary in the state.</p> <p>Ondo: Same as other states. Counterpart funding issues were also experienced. They would like more women inclusion.</p> <p>Osun: Projects were carried out under FADAMA. There were no hitches in disbursements. There have been no grievances, and any brought to the attention of the team are attended to. Environmental assessments were carried out. There are no negative treatments nor harassment of women. Waste management is also done effectively just as in Ekiti.</p> <p>Oyo:</p>
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	<p>Same as other states. GRMs are present. There is no sexual harassment. Non-participation is due to lack of awareness and the required land size is not available.</p> <p>Plateau: Projects were carried out under FADAMA. There were no hitches in disbursements. There have been no grievances, and any brought to the attention of the team are attended to. Environmental assessments were carried out. There are no negative treatments nor harassment of women. They also have a microfinance bank specially for farmers.</p> <hr/> <p>South East and South-South Zones:</p> <p>Abia: Same as in other states. Waste management also involves harvesting maggots to feed poultry.</p> <p>Akwa-ibom: Projects were carried out under FADAMA. There were no hitches in disbursements. There have been no grievances, and any brought to the attention of the team are attended to. Environmental assessments were carried out. There are no negative treatments nor harassment of women. Awareness and training are necessary in the state. More equipment is needed to protect against flooding. Would like women inclusion rate to increase to 35%.</p> <p>Anambra: Same as in Lagos state. They have a women inclusion rate of 35%</p> <p>Bayelsa: Projects were carried out under FADAMA. There were no hitches in disbursements. There have been no grievances, and any brought to the attention of the team are attended to. Environmental assessments were carried out. There are no negative treatments nor harassment of women.</p> <p>Cross River: Projects were carried out under FADAMA. There were no hitches in disbursements. There have been no grievances, and any brought to the attention of the team are attended to. Environmental assessments were carried out. There are no negative treatments nor harassment of women.</p>
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	<p>Price of feed is more of a challenge for them. Also had issues with market link. Women didn't benefit in the 50/50 counterpart fund scheme from last time nor the FUEF.</p> <p>Delta: Projects were carried out under FADAMA. There were no hitches in disbursements. There have been no grievances, and any brought to the attention of the team are attended to. Environmental assessments were carried out. There are no negative treatments nor harassment of women. GRMs in place. No case of sexual harassment.</p> <p>Ebonyi: Same as other states. Experience challenges with modern machineries unavailable. Environmental assessment is a prerequisite. They would like more women inclusion; 40 – 50%. Non-participation is due to lack of complete eligibility criteria.</p> <p>Edo: Fishery is carried out. GRM boxes are used. 56% women inclusion.</p> <p>Enugu: <i>Not available to respond.</i></p> <p>Imo: Poultry production is done; specifically turkey production. Hitches are in sustaining facilities currently in place for the projects. They have a 51% women inclusion rate.</p> <p>Rivers: Projects were carried out under FADAMA. There were no hitches in disbursements. There have been no grievances, and any brought to the attention of the team are attended to. Environmental assessments were carried out. There are no negative treatments nor harassment of women. Scope of ADP should be enlarged, and training should be increased. Charcoal is used to dispel the smell of fish water. Women are given 60% inclusion. No harassment has been experienced. There are also women only groups.</p>
Perceptions about the Project	The representatives were pleased with the presentation of the program.
Recommendations and Remarks	Generally, the consultations process was a success.

Annex 11: List of Excluded Activities from the Nigeria CARES PforR

S/No	List of Excluded Activities
1	All activities under Result Area 4 (Strengthened Institutional support for State coordination and delivery). This result area will be financed through Investment Project Financing (IPF) instrument.
2	Construction of large scale water (surface and underground) infrastructure including dams, primary and secondary canals.
3	Construction projects that are not considered to be part of community micro-projects and that exceeds the amount budgeted for community micro-projects.
4	Construction or other projects that will involve land acquisition and resettlement of project affected persons. However, voluntary land donation will be permitted.
5	Works, goods and consultancy contracts above the Operations Procurement Review Committee thresholds.
6	Significant expansion of manufacturing or industrial processing facilities
7	Other activities or projects that will have adverse effect on the environment that is deemed high.

Note: These excluded activities will be part of the financing agreement

Annex 12: Summary of Output of Post-Draft ESSA Consultation with States Nigeria CARES

Aim of meeting: To discuss the findings of the ESSA Report and the recommendation provided

The following States submitted their response to the ESSA prior to the stakeholders meeting;

Delta, Nasarawa, Katsina, Bauchi, Yobe, Taraba, Ogun, Sokoto, Ekiti, Zamfara, Enugu, Kebbi, Kogi, FCT, Cross-Rivers, Adamawa, Abia, Ebonyi, Bornu, Bauchi, Gombe, Oyo, Rivers, Ondo and Jigawa State.

ESSA matrix of comments

S/n	Name	State	Designation	Comment on the ESSA from the States	How it was addressed by the Bank
1		Abia			
2		Adamawa			
3	Effiong Edet Ekpeyong	Akwa-Ibom	Permanent secretary Ministry of Economic Development and Planning representing the state focal person the Honorable Commissioner of the Ministry.	All documents required of the state have so far been sent. On the issue of Environmental law, the state is currently adopting the Federal Government law especially in the areas it will affect the state. On the recommendations, we promise to work assiduously with the ministry of environment on the environment issue to ensure that we attain all the recommendations. kindly communicate to us any gaps in our submissions	We shall revert back to you as it goes beyond submitting the documents but the adequacy of the documents is also very important.
4	Ogochukwu Ochidi	Anambra	Deputy focal person	Still going through with the recommendations on the ESSA, to come back on the questions. A couple of documents such as child right law, have been sent	Noted We did not receive your waste management policy/ law and other laws have not been sent to the Bank. Kindly scan to us these and your other relevant laws
5	Dr Aminu Gmawa Yeusa Adamu	Bauchi	Permanent secretary ministry of budget and economic Planning representing the focal person	You did a very good job as our submissions were captured and even more, if we have more comments, it will reach the Bank team latest on Monday. Make available the presentation to us. We will like to know if there are gaps in our documentation	No document has been received from Bauchi as at today. No feedback from the report have been received from the state.

6		Bayelsa			
7	Samuna Gariguja	Benue	State planning commissioner of Benue, Focal Person	No major issue, however, there were some omission's in the attendance record as I was available in the previous round of meeting but my name wasn't recorded. Review is still ongoing with other colleagues and will send back by email our comments	Dr Nnaemeka said the report indicated that they have not supplied their comments as what was submitted was so empty. Benue acknowledged that they submitted it in July to Ugonne. Elijah however said everything sent by the states was shared with them, however, there are some gaps and will revert back to the State on the gaps and Benue said they are ready to respond accordingly.
8	Engr. Muhammed Mustapha	Bornu	Environmental officer in the State representing the focal person	We would like to know some of the gaps. Going through the recommendations and no comments for now.	we shall go through the recommendations and Revert back.
9	Mr Michael	Cross rivers		Not captured.	
10	Dr. Barry Egbe	Delta	Commissioner Economic Planning and the focal person for the project	We have submitted almost all that is needed. The two outstanding things have also been submitted to Ugonne this week, the safety policy and GBV law/guideline and Ugonne has acknowledged receipt of the two submissions	Elijah responded that Ugonne shared it with them
11	Dr Odozinim	Ebonyi	Focal person attending with representative from Fadama and CSDA	All submissions have been made and we also observed your comments on the Environmental Assessment, but we were advised to make our submission because of the bulky nature of the Laws but maybe you may not have gone through the detailed provisions of outlaws that's why your comment was that it was weak. So yesterday, we decided to scan all the laws available in the state and sent it to Ugonne which she acknowledged. We believe that a second look at these laws will give an improved understanding on the strength of the Environmental laws that are available. 12We	Elijah said what we did was to send the report early enough to get feedback from you so that whatever that we document will be a true reflection of your position. We have looked at the law and we want to look at the relevant section of the Law as we sent in our email. Just scan only the relevant section and we will address all other issues. This is noted and once we finalize the whole report we will all see the revised version of the report and how it reflects some of these points. You know the system more than we do and we can only document based on the information you provide.

				submitted Environmental permission law, law on climate change, Environmental offenses law, 2015. We are optimistic that if you go through, you will have an improved rating on what is available in our state. We appreciate you for all your effort and that you for what you have done so far.	
12		Edo			
13	Femi Ajayi	Ekiti	Commissioner for budget and Economic Planning and the team leader for state care	We submitted a whole range of our laws to you and Ugonne at the wee hours of yesterday but up till now, we have not gotten any feedback from you. But looking at the recommendations we have seen on GBV, what you recommended there, we also have a GBV committee in our State which also monitors the activities of GBV. The wife of the governor is the chairperson of the committee and have gone round all the 16 local governments of the state for sensitization and enlightenment and even did radio programme to this effect. All the recommendations are achievable, we request you still send us the template so we can review it with the Ministry of Environment, and Fadama after the presentation and revert back to you	Elijah; we appreciate all these details and have been documented. What we will expect is to look at the recommendation if you are fine with the recommendations and are achievable and where do you think you will have difficulties as a state in achieving some of the recommendations
14	Adakene Oyawune	Enugu	Honorable commissioner for finance and economic development and the focal person for Cares	We don't have a general Environmental law but it is entrenched in the ENSWEMA (Enugu State Waste Management) law. On other recommendations that we have also put in place, we will try to develop the CSA programme according to your recommendation. We are still trying to implement some of the environmental issues you mentioned so we will go ahead based on your recommendations.	It is important to clarify that it is not a pass or fail issue. Once this program action plan is approved, it becomes binding on all of us both at the implementation level and at the Bank level as performance will be measured based on all these actions. All participating states should note this especially on pages 8-9 and 57-59 and the program action plan. We have taken time to couch this recommendations in such a way that it cut across and we think it is

					doable going by all that is ongoing in the state and as a result of the documents you sent to us and the feedback you provided from all these conversation. Please take note that the recommendations were not influenced by any state
15		FCT			
16		Gombe			
17		Imo			
18	Alhassan Ibrahim Moriki	Jigawa	Permanent secretary budget and economic planning directorate	We have seen the recommendations and I think we are currently running similar project under Bezda which have similar ESSA recommendations. We have gone through the document sent to us and by virtue of what we are adopting in the implementation of Bezda in the state, we still find this recommendation very useful and may I ask the presenter can have access to the recommendations so that we can mirror them with the existing ones where we need to make amends and compliance	
19	Muhammed Sani Abdullahi	Kaduna	Chief of staff to the Governor and the focal person on this programme and joined by special assistant to the Governor on Environmental Issues	We have gone through the presentation and the recommendations are largely fine with us, just that am ambit concerned as there was a clarification made during the presentation that construction very emphatically should not be included as part of the programme. I find it a bit difficult to reconcile with the public works part of the programme, I noticed that the presenter mentioned that this will be for rehabilitation only. If we look at the programme the way we are designing it for other state, it is very important that we are not claiming several standalone things but we have to find a way that these things all connect and improves our states together at the long	On the issue of construction, under this PforR, aside from community infrastructure that will be constructed, on the irrigation aspect, no construction will be done on the primary canal or the secondary canal, only on the..... If the state Government for example is on embarking on certain construction works and labours will be mined from the state and social register as labour intensive work, that is not the same as saying construction under this programme. Of course, the labour intensive work will be only labour that will be mined from social register to carry out labour intensive work in existing construction activities that is ongoing by the state. That does

				<p>run. This might be a response to Covid, but at the end of the day, we have to build a programme that even after this particular initiative, we can continue so if you look at the public work side for example, what we are looking at is labour extensive initiatives that are happening in the state that we can scale up. So, I really want a bit of clarification on what exactly is the definition of construction understand where it has adverse social impact like land grabbing.</p>	<p>not mean that the programme will finance construction at the state level. The only one that will be financed is community infrastructure for which the presenter explained clearly that this type of construction will only be based on land that are either Government land or community owned land. Because construction in the state for instance will require huge land acquisition and displacements.</p> <p>Public work are works that can only be drafted to existing construction works that is ongoing in the state where the state decides to go for labour intensive work result area or DLIs. So, its not to say that this programme will finance construction. It is an holistic kind of intervention but at the same time we try to make sure this project also targets and achieves two types key result which is It must disburse very quickly, It must be within the space of 2years. So we also know the details involved in huge construction work which will delay and require huge procurement process which will delay the project and not enable it achieve the PDO within that 2years time frame.</p> <p>The Framework for Responsible and Inclusive Land-Intensive Agricultural Investments (FRILIA) process is also under the Kaduna PforR programme and is one part of the PforR that really supports the process of making land available for investment project in a transparent and accessible manner. It also supports the fact that land to be available for investment in each state under FRILIA must</p>
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					<p>not involve any form of involuntary displacement of land owner and it also supports documentation of land process. It is a really good process under this operation if the Kaduna state Government can prove that these are land that are available and free of all forms of encumbrances. The key thing for us is that we do not encourage or involve any form of involuntary displacement of people under this project.</p> <p>For the sake of other states participating, Kaduna State participants needs to know that based on what is happening in Kaduna, Edo state has adopted that process as well and currently we have the Edo GIS who are also tilting towards the FRILIA process</p>
20		Katsina			
21	Imam Inuwa Gwale	Kano	Representing the focal person for the Cares program	I have gone through the presentation and recommendations but my only observation is I didn't see where you highlighted the issue of sensitization for the populace to understand the essence of this topic	<p>That is provided in bullet 4 in the recommendation.</p> <p>We still noticed some gaps in your documents. Please send an email to confirm the document you have sent thus far.</p>
22	Abba Kalgo	Kebbi	Commissioner for budget and Economic planning	<p>To what extent do these gaps threaten the participation of the state in the cares program such that if these recommendations are not implemented as some say put in place plans for motion i.e. looks like they have to happen before the program.</p> <p>For example, the one that says you need to train your environment employee, have you considered if the time frame is sufficient for the kind of training you envision prior to the start of the program?</p>	<p>It will not threaten any state participation, however there is a program action plan with the timeline in the presentation made. There are timelines for each of the recommendations which will further guide you know the one you need to put in place prior to implementation of the program and the ones that will specify verification or means of verification to show that you have achieved that requirement or recommendation.</p> <p>This training is the one you will develop as a state. The recommendation specified that environmental officers, GRM officers etc that has roles to play and are expected to be part of</p>

				<p>But we can have technical assistance in terms of hand holding from either the NGO or the Bank?</p>	<p>your team. The state need to organize training for these technical staff which could be part of the state training program for your staff as a ministry and department. But with this Nigerian Cares programme, you can now expand the scope of the training to cover some of the recommendations listed in this report.</p> <p>If the need arises, yes you can get technical assistance from NGF for example. One important thing you must take into consideration is the means of verification. independent verification agency must be able to very that you have indeed carried out the training for your technical staff either through support from NGF or through your state training program.</p>
23	Lydia Oluwole	Kogi	Environmental and safeguards officer from Fadama	<p>Looking at the recommendation, most of these activities are what we have been implementing under the Fadama like the Land donation and the GRM. We only need to legalize it based on the initial consultation we had. We already have an existing forest management committee because we implemented the GEF programme under the sustainable land management program and we ensured that the forest management committee is also in place. GBV is part of the ministry of women affairs activity, and I don't know if they have submitted on that as they were submitted through the focal persons. For us in Fadama, it's like a continued work and so you won't have problems with us. We have some of our documents in hard copy so we were unable to send.</p>	<p>We got documents from Kogi. Our data indicates there are a lot of gaps in Kogi state in terms of social compliance issues. Send us an email and snap relevant sections of the outstanding documents including the frontpage and send as an attachment.</p>

24		Kwara			
25	Solape Harmond	Lagos	State team leader. Also run the office of the STGs and investments	We will update the Labour policy and check about the child laws. Generally, the recommendations are fine for Lagos	We will look forward to receiving those outstanding documents from you. And also, we have not heard from you in terms of your input to the report.
26	Kairo Umar Ibrahim	Nasarawa	Representing the Nasarawa State Cares team lead	We are satisfied with the comments captured in our State and we responded with our feedback to state that NEPA which was captured was supposed to be NASEPA.	
27		Niger			
28		Ogun			
29		Ondo			
30	Seyi Afolabi	Osun	Assistant director in the Ministry of economic planning and budget representing the focal person	We have gotten the document and sent it to the relevant agency to make comment and shall forward back to the Bank on or before 7 th sept, 2020. We have gender policy which we have sent to the Bank, and also we have a full-fledged agency in charge of allocating land. The recommendation will be deliberated upon so we can see where we are now. We are ready and committed to this program	Nothing has been shared with us on your Environmental document (laws, regulations, waste management laws, occupational health and safety law). Just scan the front page and relevant sections of those laws and email them to us alongside your input to the report we have shared with you. You will need to communicate the program action plan with your team because it will be binding on all the states by the time we finalise the report.
31	Kikelomo Adegote	Oyo	State Cares coordinator, Speaking on behalf of commissioner for finance who is also the team lead	Environmental officer (Omoniyi Ayomide) from the ministry of environment will speak to our comments. We will check up with the recommendations revert as soon as possible	There are some gaps in the documents provided, we shall revert shortly.
32	Bomkam Will	Plateau	Director admin and finance of PLASMIDA representing the state focal person	The recommendations are okay and we will work around it as a state to see that we key into what was done. I must commend Prof for a job well done.	We will check up with your document to confirm if all your submissions are complete via email after the meeting. Particularly on your Environment related document i.e. your laws, policy regulation, waste management etc., are missing in all documents sent to us

33		Rivers			
34		Sokoto			
35		Taraba			
36	Muhammed Safari Yusuf	Yobe	Adviser to the Governor and the team leader of the Cares project	We are okay with the recommendations. All I wanted to say has been captured by Kebbi, we are looking forward to you sharing the documents and if we have any other clarifications, we will connect you via email	Yobe has been very responsive with their submissions. We will share the presentation because of the recommendations and action plan. Some of your response were indicative that these laws exist but were not attached. Kindly revert.
36	Kabiru Muhammed	Zamfara	Permanent secretary ministry of budget and economic planning and the State team leader for the Cares program	Didn't capture	Gender framework was also not submitted

Annex 13: Summary of Output/Response from GEEP Beneficiaries during Consultation

Name of Area where consultation was conducted	Phone call consultations with GEEP beneficiaries
Date consultation was conducted	September 3, 2020
Language of Communication	English language
Summary of Matters discussed	
Opening remarks	A brief overview of the proposed project was presented, and the purpose of the consultation was introduced to the stakeholders. Stakeholders were told how their information was retrieved and from who in order to make them more comfortable about the consultation. Information about the participants was also confirmed before consultation began.
Questions to stakeholders and their responses	
Rotimi Felicia	<ol style="list-style-type: none"> 1. Do you have a registered business name or limited liability company? Yes, selling hair and beauty products 2. For how long has your business been operating? Since 2001 (19 years) 3. Do you pay levies and taxes to government as and when due? Makes payments to Trade union groups, LGAs and government taxes. 4. Do you pay waste management fee? Not sure. 5. Do you pay any environmental levy besides waste management fee? No. 6. Have you ever received credit facilities from banks (commercial and microfinance banks) to promote your enterprise? Received from Guru Me Bank once to repair shop. 7. Are you aware of any agency in your state through which government reach out to SME? There are numerous ones like Guru Me and Heritage 8. Has the agency assisted you in receiving credit facilities? Yes. Through weekly collections in groups 9. Do you know about Environmental Impact assessment (EIA)? No. 10. Have you ever carried out an EIA for your company/business? Yes, from Kwara State 11. Has any government agency ever asked you for your company's EIA report and Environmental Impact Statement? No. 12. Do your company have a health, safety environmental (HSE) policy? Only from lessons learnt through meetings with HOPE Group 13. Do the state government require you to have HSE policy? No. 14. How do your company ensure that women are not discriminated against regarding employment? There is no discrimination against women. <p>The beneficiary's husband asked to also speak, and expressed that their community has been saturated with a lot of consultations, form filling and 'wanting to give assistance' (i.e. consultation fatigue). He expressed that they have been promised many things by many</p>

	agencies, many times which often do not get fulfilled. He recommended training and assistance to community members especially for women.
Ikyor Emmanuel	<ol style="list-style-type: none"> 1. Do you have a registered business name or limited liability company? No 2. For how long has your business been operating? 5 years 3. Do you pay levies and taxes to government as and when due? Yes. To FIRS and to trade unions 4. Do you pay waste management fee? Yes 5. Do you pay any environmental levy besides waste management fee? Yes 6. Have you ever received credit facilities from banks (commercial and microfinance banks) to promote your enterprise? No 7. Are you aware of any agency in your state through which government reach out to SME? No 8. Has the agency assisted you in receiving credit facilities? No 9. Do you know about Environmental Impact assessment (EIA)? No 10. Have you ever carried out an EIA for your company/business? No 11. Has any government agency ever asked you for your company's EIA report and Environmental Impact Statement? No 12. Do your company have a health, safety environmental (HSE) policy? No 13. Do the state government require you to have HSE policy? No 14. How do your company ensure that women are not discriminated against regarding employment? They have 1 out of three staff who is a woman, but there is no discrimination
Mustapha Elizabeth	<ol style="list-style-type: none"> 1. Do you have a registered business name or limited liability company? No 2. For how long has your business been operating? 7 years 3. Do you pay levies and taxes to government as and when due? Tax on revenue is paid to Niger state 4. Do you pay waste management fee? Yes 5. Do you pay any environmental levy besides waste management fee? Yes 6. Have you ever received credit facilities from banks (commercial and microfinance banks) to promote your enterprise? Yes, from Hassan Microfinance Bank 7. Are you aware of any agency in your state through which government reach out to SME? No 8. Has the agency assisted you in receiving credit facilities? No 9. Do you know about Environmental Impact assessment (EIA)? Yes 10. Have you ever carried out an EIA for your company/business? Yes, four years ago 11. Has any government agency ever asked you for your company's EIA report and Environmental Impact Statement? Yes

	<p>12. Do your company have a health, safety environmental (HSE) policy? Yes, gotten from trainings from the Environmental Secretariat</p> <p>13. Do the state government require you to have HSE policy? Yes. The Tafa LGA requires this</p> <p>14. How do your company ensure that women are not discriminated against regarding employment? There is no discrimination of women. All staff are women</p>
Idi Ibrahim	<p>1. Do you have a registered business name or limited liability company? Yes</p> <p>2. For how long has your business been operating? 12 – 13 years</p> <p>3. Do you pay levies and taxes to government as and when due? No</p> <p>4. Do you pay waste management fee? No</p> <p>5. Do you pay any environmental levy besides waste management fee? No</p> <p>6. Have you ever received credit facilities from banks (commercial and microfinance banks) to promote your enterprise? No</p> <p>7. Are you aware of any agency in your state through which government reach out to SME? Yes. NASEN</p> <p>8. Has the agency assisted you in receiving credit facilities? No</p> <p>9. Do you know about Environmental Impact assessment (EIA)? No</p> <p>10. Have you ever carried out an EIA for your company/business? No</p> <p>11. Has any government agency ever asked you for your company's EIA report and Environmental Impact Statement? No</p> <p>12. Do your company have a health, safety environmental (HSE) policy? Yes</p> <p>13. Do the state government require you to have HSE policy? Yes</p> <p>14. How do your company ensure that women are not discriminated against regarding employment? There is no discrimination, both genders work</p>
Iliya Afiniki	<p>1. Do you have a registered business name or limited liability company? No</p> <p>2. For how long has your business been operating? 15 years' plus</p> <p>3. Do you pay levies and taxes to government as and when due? Yes, revenue tax</p> <p>4. Do you pay waste management fee? Yes</p> <p>5. Do you pay any environmental levy besides waste management fee? No, same as waste fee</p> <p>6. Have you ever received credit facilities from banks (commercial and microfinance banks) to promote your enterprise? No</p> <p>7. Are you aware of any agency in your state through which government reach out to SME? Yes, COVID-19 palliative.</p> <p>8. Has the agency assisted you in receiving credit facilities? No</p> <p>9. Do you know about Environmental Impact assessment (EIA)? No</p> <p>10. Have you ever carried out an EIA for your company/business? No</p>

	<p>11. Has any government agency ever asked you for your company's EIA report and Environmental Impact Statement? No</p> <p>12. Do your company have a health, safety environmental (HSE) policy? Yes, COVID-19 measures</p> <p>13. Do the state government require you to have HSE policy? No.</p> <p>14. How do your company ensure that women are not discriminated against regarding employment? Currently not in operation because of the pandemic, but all staff are women</p>
Abubakar Ahmed	<p>1. Do you have a registered business name or limited liability company? No</p> <p>2. For how long has your business been operating? 35 years</p> <p>3. Do you pay levies and taxes to government as and when due? Yes</p> <p>4. Do you pay waste management fee? Yes, paid to private laborers</p> <p>5. Do you pay any environmental levy besides waste management fee? Yes</p> <p>6. Have you ever received credit facilities from banks (commercial and microfinance banks) to promote your enterprise? No</p> <p>7. Are you aware of any agency in your state through which government reach out to SME? Bank of Industry</p> <p>8. Has the agency assisted you in receiving credit facilities? No</p> <p>9. Do you know about Environmental Impact assessment (EIA)? No</p> <p>10. Have you ever carried out an EIA for your company/business?</p> <p>11. Has any government agency ever asked you for your company's EIA report and Environmental Impact Statement? No</p> <p>12. Do your company have a health, safety environmental (HSE) policy? Use of rain boots and face masks on farm</p> <p>13. Do the state government require you to have HSE policy? No</p> <p>14. How do your company ensure that women are not discriminated against regarding employment? There is no steady staff base, private laborers are paid per day that they work and this usually includes women.</p>
Ossai Lucy	<p>1. Do you have a registered business name or limited liability company? No</p> <p>2. For how long has your business been operating? Began in 2015, but stopped because of financial constrain, then began again in 2019</p> <p>3. Do you pay levies and taxes to government as and when due? Yes</p> <p>4. Do you pay waste management fee? No</p> <p>5. Do you pay any environmental levy besides waste management fee? No</p> <p>6. Have you ever received credit facilities from banks (commercial and microfinance banks) to promote your enterprise? Yes, Bank of Industry in 2017</p> <p>7. Are you aware of any agency in your state through which government reach out to SME? BOI and Cooperatives</p> <p>8. Has the agency assisted you in receiving credit facilities? Yes</p>

	<p>9. Do you know about Environmental Impact assessment (EIA)? Yes</p> <p>10. Have you ever carried out an EIA for your company/business? No</p> <p>11. Has any government agency ever asked you for your company's EIA report and Environmental Impact Statement? No</p> <p>12. Do your company have a health, safety environmental (HSE) policy? Yes, this was learnt from my church</p> <p>13. Do the state government require you to have HSE policy? No</p> <p>14. How do your company ensure that women are not discriminated against regarding employment? There is no discrimination. Staff size is 2</p>
Opuene Ngomuna	<p>1. Do you have a registered business name or limited liability company? Yes</p> <p>2. For how long has your business been operating? Since 2010 or 2011</p> <p>3. Do you pay levies and taxes to government as and when due? Yes, to FIRS</p> <p>4. Do you pay waste management fee? No</p> <p>5. Do you pay any environmental levy besides waste management fee? No</p> <p>6. Have you ever received credit facilities from banks (commercial and microfinance banks) to promote your enterprise? Never applied</p> <p>7. Are you aware of any agency in your state through which government reach out to SME? BOI and Onipay</p> <p>8. Has the agency assisted you in receiving credit facilities? Still in the process of applying</p> <p>9. Do you know about Environmental Impact assessment (EIA)? Yes</p> <p>10. Have you ever carried out an EIA for your company/business? No</p> <p>11. Has any government agency ever asked you for your company's EIA report and Environmental Impact Statement? Yes, PPE (Personal Protective ...)</p> <p>12. Do your company have a health, safety environmental (HSE) policy? Yes</p> <p>13. Do the state government require you to have HSE policy? Yes, Mostly for COVID-19</p> <p>14. How do your company ensure that women are not discriminated against regarding employment? There is a staff ratio of 3 women out of 11 staff, but there is no discrimination.</p>
Oyeniran Sherifat	<p>1. Do you have a registered business name or limited liability company? No, it is a local food stuff business</p> <p>2. For how long has your business been operating? 21 years</p> <p>3. Do you pay levies and taxes to government as and when due? Council fees</p> <p>4. Do you pay waste management fee? No</p> <p>5. Do you pay any environmental levy besides waste management fee? At the house's shop, yes</p> <p>6. Have you ever received credit facilities from banks (commercial and microfinance banks) to promote your enterprise? Loans from LAPO</p> <p>7. Are you aware of any agency in your state through which government reach out to SME? No</p>

	<p>8. Has the agency assisted you in receiving credit facilities? No</p> <p>9. Do you know about Environmental Impact assessment (EIA)? No</p> <p>10. Have you ever carried out an EIA for your company/business? No</p> <p>11. Has any government agency ever asked you for your company's EIA report and Environmental Impact Statement? No</p> <p>12. Do your company have a health, safety environmental (HSE) policy? No</p> <p>13. Do the state government require you to have HSE policy? No</p> <p>14. How do your company ensure that women are not discriminated against regarding employment? Had only 2 staff, but had to cut down to only herself because of the pandemic.</p>
Shehu Semiu	<p>1. Do you have a registered business name or limited liability company? Yes</p> <p>2. For how long has your business been operating? 30 years plus</p> <p>3. Do you pay levies and taxes to government as and when due? No</p> <p>4. Do you pay waste management fee? No</p> <p>5. Do you pay any environmental levy besides waste management fee? No</p> <p>6. Have you ever received credit facilities from banks (commercial and microfinance banks) to promote your enterprise? Yes, six to seven years ago from Sterling Bank</p> <p>7. Are you aware of any agency in your state through which government reach out to SME? No</p> <p>8. Has the agency assisted you in receiving credit facilities? No</p> <p>9. Do you know about Environmental Impact assessment (EIA)? Yes</p> <p>10. Have you ever carried out an EIA for your company/business? No</p> <p>11. Has any government agency ever asked you for your company's EIA report and Environmental Impact Statement? No</p> <p>12. Do your company have a health, safety environmental (HSE) policy? No</p> <p>13. Do the state government require you to have HSE policy? No</p> <p>14. How do your company ensure that women are not discriminated against regarding employment? There are 2 female staff out of a total of 3 staff, so there is no discrimination.</p>
Nwigwe Sandra	<p>1. Do you have a registered business name or limited liability company? No</p> <p>2. For how long has your business been operating? 5 years</p> <p>3. Do you pay levies and taxes to government as and when due? Shop fees are paid to the Task force monthly</p> <p>4. Do you pay waste management fee? No</p> <p>5. Do you pay any environmental levy besides waste management fee? Yes, once in two months</p> <p>6. Have you ever received credit facilities from banks (commercial and microfinance banks) to promote your enterprise? No, applied but was not granted</p>

	<p>7. Are you aware of any agency in your state through which government reach out to SME? No</p> <p>8. Has the agency assisted you in receiving credit facilities? No</p> <p>9. Do you know about Environmental Impact assessment (EIA)? No</p> <p>10. Have you ever carried out an EIA for your company/business? No</p> <p>11. Has any government agency ever asked you for your company's EIA report and Environmental Impact Statement? No</p> <p>12. Do your company have a health, safety environmental (HSE) policy? Yes, Measures against COVID-19</p> <p>13. Do the state government require you to have HSE policy? Yes</p> <p>14. How do your company ensure that women are not discriminated against regarding employment? Has 2 staff apprentices, both are women.</p>
Uba Chukwuma	<p>1. Do you have a registered business name or limited liability company? Yes</p> <p>2. For how long has your business been operating? 11 years</p> <p>3. Do you pay levies and taxes to government as and when due? Yes</p> <p>4. Do you pay waste management fee? Yes</p> <p>5. Do you pay any environmental levy besides waste management fee? Yes</p> <p>6. Have you ever received credit facilities from banks (commercial and microfinance banks) to promote your enterprise? No</p> <p>7. Are you aware of any agency in your state through which government reach out to SME? No, but had heard of a loan scheme once</p> <p>8. Has the agency assisted you in receiving credit facilities? No</p> <p>9. Do you know about Environmental Impact assessment (EIA)? No</p> <p>10. Have you ever carried out an EIA for your company/business? No</p> <p>11. Has any government agency ever asked you for your company's EIA report and Environmental Impact Statement? No</p> <p>12. Do your company have a health, safety environmental (HSE) policy? No</p> <p>13. Do the state government require you to have HSE policy? No</p> <p>14. How do your company ensure that women are not discriminated against regarding employment? Staff of 4 women out of 14 staff, there is no discrimination.</p>
Perceptions about the project	Generally, participants were welcoming and happy to answer questions once they felt comfortable.
Recommendations and remarks	Overall, the consultation process was a success.

Annex 14: List of GEEP Beneficiaries Consulted

S/N	Surname	First Name	Gender	Type of Business	Phone Number	State	Geo-Political Zone
1.	Rotimi	Felicia	Female	Fashion designer	08067415965	Kwara State	North Central
2.	Ikyor	Emmanuel	Male	Computer/café business centre	09094008931	Benue State	
3.	Mustapha	Elizabeth	Female	Poultry Farm	08076910876	Kaduna State	North West
4.	Idi	Ibrahim	Male	IV Touch Design	07063373327	Kaduna State	
5.	Iliya	Afiniki	Female	Fashion designer	07038374872	Bauchi State	North East
6.	Abubakar	Ahmed	Male	Farmer	08029428984	Gombe State	
7.	Ossai	Lucy	Female	Poultry Farming	08072217162	Delta State	South South
8.	Opuene	Ngomuna	Male	Pop Ventures	08036720004	Bayelsa State	
9.	Oyeniran	Sherifat	Female	Food stuff	08027994867	Lagos state	South West
10.	Shehu	Semiu	Male	Contractor	08160660954	Oyo State	
11.	Nwigwe	Sandra	Female	Fashion designer	09033130144	Abia State	South East
12.	Uba	Chukwuma	Male	Boss Berbers Shop	08035662337	Imo State	

