

**Federal Ministry of Humanitarian Affairs,  
Disaster Management and Social Development  
National Social Safety-Nets Program – Scale Up  
[P176935]**

**Draft**  
**ENVIRONMENTAL AND SOCIAL  
COMMITMENT PLAN (ESCP)**

**November 2021**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Government of Nigeria (hereinafter the Recipient) will *implement* the National Social Safety-Nets Program – Scale Up (the **Project**), with the involvement of the following: Federal Ministry of Humanitarian Affairs, Disaster Management, and Social Development (FMHADMSD); Federal Ministry of Finance, Budget and National Planning (MFBNP); and State Governments through the Ministries of Budget and Planning; and coordinating Ministries supervising the State Cash Transfer Units; National Social Safety Nets Coordinating Office (NASSCO). The *International Development Association hereinafter the Bank is providing* financing for the Project.
2. The Recipient through the FMHADMSD and participating States will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The Recipient will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Plans (ESMP), Labour Management Procedures (LMP) and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.
4. The Recipient is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministries referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the *Bank* by the Federal Government of Nigeria as required by the ESCP and the conditions of the legal agreement, and the *Bank* will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the *Bank* and the Recipient, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Recipient will agree to the changes with the *Bank* and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the *Bank* and the Recipient. The Recipient will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Federal Government of Nigeria shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include as environmental, health, and safety impacts, gender-based violence.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&amp;S documents required under the ESCP, stakeholder engagement activities, leveraging on the NASSP Grievance Redress Mechanism (GRM).</p>	<p>Every six months throughout the Project implementation, starting from the effective date.</p>	<p>NASSP Team (GRM Team, M&amp;E, etc.)</p> <p>Monitoring, Evaluation, Research &amp; Learning (MERL) Department, NASSCO</p>
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including without limitation any allegations of gender-based violence, project-related occupational accidents or fatalities, or labour unrest, COVID outbreak due to crowd registrations, issues of allegation of sexual exploitation and abuse/sexual harassment (SEA/SH). Provide sufficient details regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Bank request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p><i>Notify the Bank within 48 hours after learning of the incident or accident to the Bank, as requested. A subsequent report would be provided within a timeframe acceptable to the Bank, as requested.</i></p> <p>Notify the Bank of SEA/SH incidents within 24 hours of learning of the incident.</p>	<p>FMHADMSD/NASSCO (Environmental and Safeguard Team, Monitoring, Evaluation, Research &amp; Learning (MERL), NASSP GRM Team)</p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Maintain the existing organizational structure of the NASSCO, and State and LGA level implementation units with Environmental, Gender/Social and GRM Officers who will continue to provide support under the NASSP SU.</p> <p>Conduct ESF training as provided in CS1</p>	<p>Throughout Project implementation.</p>	<p>FMHADMSD/NASSP and Participating States</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.2 <b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>Prepare, disclose and implement the following instruments in accordance with the ESSs and in a manner acceptable to the Bank:</p> <ol style="list-style-type: none"> <li>i. Generic Environmental and Social Management Plan which includes an annex on LMP</li> <li>ii. Stakeholder Engagement Plan (SEP) including Grievance Redress Mechanism (GRM)</li> <li>iii. GBV Action Plan</li> <li>iv. A Project Implementation Manual (PIM) with the environmental and social standards' section describing in detail: <ul style="list-style-type: none"> <li>• The role of E&amp;S specialist</li> <li>• The minimum environmental and social clauses to be included in the ToRs and tender documents (including codes of conduct, coordination, reporting and monitoring, and grievance redress mechanisms)</li> <li>• Incorporate environmental and social indicators into the monitoring and evaluation system</li> <li>• Completion timeframes</li> <li>• Occupational, Health and Safety system (including GBV action plan), COVID-19 Protocols.</li> </ul> </li> <li>v. Within six (6) months after Project Effectiveness, a Process Evaluation (review) of the effectiveness of the different delivery approaches (targeting, payment, social accountability mechanism, gender and social inclusion) will be captured in the M&amp;E plan of the program and will be conducted under the Component 1 (urban locations) more specifically and to include component 2 as necessary, to ensure that additional social and accountability risks are not created.</li> </ol>	<p><i>Within one month after effectiveness. Once approved, the recommendations from the generic ESMP are carried out throughout Project implementation.</i></p> <p><i>SEP, including GRM instrument, will be issued and disclosed by completion Appraisal.</i></p> <p><i>GBV Action Plan developed within one month after effectiveness</i></p> <p><i>PIM to be adopted before effectiveness</i></p> <p>Within six (6) months after Project Effectiveness, a Process Evaluation (review) of the effectiveness of the different delivery approaches is conducted</p>	<p>FMHADMSD/NASSP</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>		
<p>2.1 <b>LABOR MANAGEMENT PROCEDURES</b>                      Incorporate the Labor Management Procedures (LMP) as part of the generic ESMP</p> <p>Prepare a Labor Management Procedures (LMP) as an Annex in the generic ESMP within a month after effectiveness that will detail the aspects of ESS2 that apply to civil servants (especially OHS, like the use of PPE for workers, will be described as well as social distancing norms at distribution centers following WHO’s guidelines) that will apply in case any direct or contracted workers (hired through a third party) are hired, and will include a GRM specifically for project workers to raise any issues. The LMP will include terms and conditions of employment, non-discrimination and equal opportunity, the establishment of worker’s organizations, and occupational health and safety (OHS) measures regarding COVID-19 which will detail requirements of social distancing, use of nose mask, hand washing and hand sanitizing. The LMP will set out grievance arrangements for project workers and Codes of Conduct (CoC) that also address SEA/SH risks.</p>	<p><i>Within one month after effectiveness</i></p> <p><i>Throughout Project implementation.</i></p>	<p>FMHADMSD/NASSCO</p>
<p>2.2 <b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b>                      Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESMP</p>	<p>Throughout Project implementation</p>	<p>FMHADMSD/NASSCO and Participating States</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>E-WASTE MANAGEMENT PLAN:</b></p> <p>The generic ESMP will include measures to address the E-Waste; these measures will be acceptable by the Bank.</p>	<p><i>Within one month after effectiveness, and thereafter implemented throughout Project implementation</i></p>	<p>FMHADMSD/NASSCO</p>
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>COMMUNITY HEALTH AND SAFETY:</b></p> <p>The generic ESMP will include measures to address the SEA/SH risks and risk of community exposure to COVID-19 due to poor crowd control during registration/enrollment processes. For SEA/SH mitigation measures, the Codes of Conduct for relevant project contractors and workers will be included in the ESMP to address SEA/SH behaviours and the sanctions in case of infraction. The generic ESMP will include provisions to reinforce preventive behaviour, specific issues on GBV and SEA/SH.</p>	<p><i>Within one month after effectiveness and thereafter implemented throughout Project implementation</i></p>	<p>FMHADMSD/NASSCO</p>
4.3	<p>Implement approved Gender-Based Violence/Sexual Exploitation and Abuse/Sexual Harassment Action Plan (GBV/SEA/SH Action Plan)</p>	<p><i>Submit the GBV Action Plan for the Bank's approval within one month of Project effectiveness. Once approved, the GBV Action Plan is implemented throughout Project implementation</i></p>	<p>FMHADMSD/NASSCO</p> <p>(NASSP Gender, Environmental and Social, GRM and MERL Team)</p>
4.4	<p>Referral for GBV/SEA/SH services. Additional funding will be required to support survivors in accessing services.</p>	<p><i>Throughout project lifecycle</i></p>	<p>FMHADMSD/NASSCO and Participating States</p> <p>(Gender, GRM Team at National and States)</p>

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4.5	Security Risks. Although the project activities are not envisaged to result in the use of security personnel, conduct Security Risk Assessments wherever relevant. Wherever security personnel is engaged in connection with Project activities, the Recipient will ensure that any security personnel engaged in the relevant activities associated with the Project have been: (i) screened to confirm that they have not engaged in past unlawful or abusive behavior, including SEA, SH or excessive use of force; (ii) adequately instructed and trained, on a regular basis, on the use of force and appropriate behavior and conduct (including in relation to SEA and SH); (iii) deployed in a manner consistent with applicable national law; and (iv) will follow strict rules of engagement, code of conduct, and avoid any escalation. The Generic ESMP will provide guidance regarding how these measures will be integrated.	<i>Throughout project lifecycle</i>	FMHADMSD/NASSCO
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT:</b> This standard is not relevant for the Project.			
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES:</b> This standard is not relevant for the Project.			
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES:</b> This standard is not relevant for the Project.			
<b>ESS 8: CULTURAL HERITAGE:</b> This standard is not relevant for the Project.			
<b>ESS 9: FINANCIAL INTERMEDIARIES:</b> This standard is not relevant for the Project.			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION  Prepare, disclose, adopt, and implement Stakeholder Engagement Plan (SEP).	<i>A draft SEP is prepared and will be updated and disclosed by completion of Project appraisal</i>	FMHADMSD/NASSP
10.2	PROJECT GRIEVANCE MECHANISM:  Accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Association.	<i>Throughout Project implementation</i>	FMHADMSD/NASSP
<b>CAPACITY SUPPORT (TRAINING)</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
CS1	<p>Training of Project team on the Association procurement processes and ESF for project workers</p> <p>Specify Training to be provided and targeted groups For example, training may be required for [e.g. PIU staff, stakeholders, communities, Project workers] on:</p> <ul style="list-style-type: none"> <li>• stakeholder mapping and engagement</li> <li>• specific aspects of environmental and social assessment</li> <li>• emergency preparedness and response</li> <li>• community health and safety</li> <li>• The World Bank’s ESF</li> <li>• Environmental and Social Awareness training in the ESF</li> <li>• E&amp;S focal points will require training on their obligations under the ESMP and reporting.</li> <li>• Obligations under the Environmental and Social Management Plan</li> <li>• Obligations for reporting incidents to the client</li> <li>• Labor Management Procedures and Codes of Conduct</li> <li>• Gender Based Violence awareness and accountability training</li> </ul>	<i>Throughout Project implementation</i>	FMHADMSD/NASSP
CS2	<p>Training for Project workers on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.</p>	<i>Throughout Project implementation</i>	FMHADMSD/NASSP
CS3	<p>Train States on revised disability disaggregated data collection checklist</p>	<i>First Quarter of Project Implementation</i>	FMHADMSD/NASSCO and Participating States (NASSP Gender and Social Inclusion, Social and Environmental, GRM Team)