

FEDERAL REPUBLIC OF NIGERIA
MINISTRY OF WOMEN AFFAIRS

**Nigeria for Women Program Scale Up
(P179447)
Draft**

**ENVIRONMENTAL and SOCIAL
COMMITMENT PLAN (ESCP)**

7 December 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Nigeria (hereinafter the Recipient) will implement the Nigeria for Women Program Scale Up (P179447) (the **Project**), through the Federal Ministry of Women Affairs as set out in the financing agreement. The focus of the project is (NFWP-SU) is to facilitate improved livelihoods and access to financial and select public services for women through targeted assistance following key principles of inclusion, objective targeting, transparency, and accountability, enabling culture, and openness to learning. The International Development Association (*hereinafter the Association*) has agreed to provide financing (P179447) for the project as set out in the referred agreement.
2. The Recipient 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 that the [Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments (ESMF, ESMP, LMP, SEP, GBV Plan, RPF, RAP, SMP, IPMP) that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
3. As agreed by the Association, and 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 Association 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 Association and the Federal Ministry of Finance, Budget and National Planning. The Federal Ministry of Women Affairs will promptly disclose the updated ESCP.
4. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include *occupational health, and safety impacts, grievances, gender-based violence*.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>The recipient will prepare and submit to the Association 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&S documents required under the ESCP, stakeholder engagement activities and functioning of the grievance mechanisms.</p>	Submit Bi-annual reports to the Association throughout Project implementation, commencing after the Effective Date.	National Project Coordinating Unit (NPCU) of the Federal Ministry of Women Affairs and the State Project Coordinating Units (SPCUs) of the State Ministry of Women Affairs
B	<p>INCIDENTS AND ACCIDENTS</p> <p>1- Promptly notify the Association of any incident or accident related to or having an impact on 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:</p> <ul style="list-style-type: none"> • Any allegations of gender-based violence, • Occupational Health and Safety Issues • Accidents or fatalities • COVID-19 pandemic infection • Gender-Based Violence (GBV), exploitation, discrimination, unresolved grievances • Security incident • Labour unrest. <p>2- Provide sufficient details regarding the incident or accident, indicating immediate measures taken to address it, and include information provided, as appropriate.</p> <p>3-Subsequently, as per the World Bank’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Promptly and no later than 48 hours after taking notice of the incident or accident. It will be reported to the Association</p> <p>Notify the Association of SEA/SH incidents within 24 hours of learning of the incident.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association, as requested</p> <p>A detailed incident/accident report would be provided within a timeframe acceptable to the Bank, as requested</p>	NPCU and SPCUs
	<p>CONTRACTORS MONTHLY REPORTS</p> <p>Provide monthly report on the implementation of Contractor’s ESMP</p>	throughout Project implementation	NPCU (Environmental and Social Team)
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>The recipient shall establish and maintain, throughout the Project implementation, an organizational structure including Environmental and Social specialists with qualified staff and resources to support management of Environmental Social Health and Safety (ESHS) risks and impacts of the Project</p>	The organizational structure established for each SPCU would be maintained throughout Project implementation.	NPCU and SPCUs Environmental, Social/Gender Team
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>Prepare, disclose and implement the following instruments in accordance with the ESSs and in a manner acceptable to the Bank:</p> <ul style="list-style-type: none"> i. Environmental and Social Management Framework. The ESMF will provide a subprojects screening and assessment mechanism and will also (1) utilize the WBG General Environmental, Health, and Safety Guidelines (2) include templates for Health, Safety and Environmental (HSE) plan, and Waste Management Plan, and (3) provide references to relevant disease preventive measures, since the project activities may be affected by the ongoing COVID-19 pandemic in the short-term. In addition, the ESMF will include Labour Management Procedures (LMP), procedures to screen Business Plan Assessments from potential beneficiaries for potential E&S impacts and propose mitigation measures. ii. Stakeholder Engagement Plan (SEP) including Grievance Redress Mechanism (GRM) iii. Pest Management Plan, Security Management Plan for each participating State iv. Update the original Project's Resettlement Framework (RF), previously prepared and disclosed, to include RPF v. Prepare RAP to address the likely social and economic risks and impacts if displacement become unavoidable option 	<p>The ESMF will be prepared and disclosed before the completion of appraisal and the recommendations from the ESMF will be carried out/implemented throughout Project implementation.</p> <p>SEP, including GRM instrument will be issued and disclosed before completion Appraisal.</p> <p>Prior to the project implementation or start of civil works</p> <p>RPF is disclosed before completion Appraisal.</p> <p>RAPs are prepared before the commencement of any civil work</p>	<p>NPCU (Environmental and Social Team)</p> <p>NPCU (Environmental and Social Team)</p> <p>SPCUs (Environmental and Social Team)</p> <p>NPCU</p> <p>SPMU</p> <p>SPMU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 2: LABOR AND WORKING CONDITIONS		
<p>2.1 LABOR MANAGEMENT PROCEDURES</p> <p>The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Bank, including through, inter alia, implementing adequate occupational health and safety measures (including emergency preparedness and response measures),</p> <p>Prepare a Labor Management Procedure (LMP) as part of the ESMF. The LMP will set out how project workers will be managed, in accordance with the requirements of national laws and ESS2.</p> <p>Establishing out grievance arrangements for Project workers and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors.</p> <p>Implementing adequate occupational health and safety measures (including emergency preparedness and response measures),</p>	<p>Implementing adequate occupational health and safety measures (including emergency preparedness and response measures) three months after effectiveness</p> <p>Before the completion of project appraisal and throughout the project implementation</p> <p>Establishing out grievance arrangements for Project workers three month before effectiveness and commencement of civil work</p> <p>Develop and implement three month after effectiveness and before commencement of civil work</p>	<p>NPCU (Environmental and Social Team)</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS: Develop and maintain a Grievance Mechanism (GM) for Project workers, grantees workers and community workers as part of the LMP. The GM shall have the following:</p> <ul style="list-style-type: none"> • Proportionate to the nature and scale of the project and its risks and impacts; • Addresses concerns promptly, using an understandable and transparent process that provides timely; feedback to those concerned in a language that they understand, and without any retribution; • Operates in an independent and objective manner and implement the principles of confidentiality and anonymity where requested; 	The GM, as part of the LMP, to be prepared three months after effectiveness, and to be implemented throughout the project implementation	NPCU (Environmental and Social Team)
2.3	<p>OHS MEASURES: Develop and implement Occupational, Health and Safety (OHS) measures in line with National legislation and ESS2, as part of the LMP and ESMF</p>	To be prepared three months after effectiveness and implemented throughout the project project lifespan	NPCU (Environmental and Social Team)
2.4	<p>EMERGENCY PREPAREDNESS AND RESPONSE: As part of the OHS measures specified in 2.3, include measures on emergency preparedness and response, and ensure coordination with measures under SMP within the ESMF</p>	Develop three month after effectiveness and implement throughout the project lifespan	Participating SPIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:			
3.1	Incorporate waste management procedures as part of the ESMF. The ESMF will have a Waste Management Plans developed as part of the ESMPs, to manage the likely waste from construction works and processing facilities.	The ESMF will be prepared and disclosed prior to appraisal and the ESMP will be implemented throughout Project implementation.	NPCU and SPCUs (Environmental and Social Team)
3.2	Integrated Pest Management Plan Update the IPMP to reflect how fertilizers and pesticides will be managed during the project	Prior to the start of agricultural activities	NPCU and SPCUs (Environmental Team)
ESS 4: COMMUNITY HEALTH AND SAFETY:			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.1	Address the issues of community's health and social risks and adverse impacts such as SEA/SH, Sexually Transmission of Diseases (STDs) and COVID-19. Also, compliance with COVID-19 protocol is likely to slow down the implementation of the project activities as activities may not be implemented as planned.	Prior to commencement of any civil work and throughout the project implementation	NPCU and SPCUs (Environmental and Social Team)
4.2	TRAFFIC AND ROAD SAFETY: Develop and implement measures and actions to assess and manage traffic and road safety risks as part of the ESMF	Prior to commencement of any civil work and throughout the project implementation	SPCU (Environmental and Social Team)
4.3	GBV AND SEA RISKS: Assess and manage the risks of Sexual Exploitation and Abuse/sexual harassment (SEA/SH) as part of the ESMF.	Prior to commencement of any civil work and throughout the project implementation	SPCU (Environmental and Social Team)
4.4	Conduct Security Risk Assessments (SRA) in all participating States in the six (6) geo-political zones to develop a Security Management Plan (SMP) for each participating State.	Prior to commencement of any civil work and throughout the project implementation	Participating State
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT: The Project does not require land acquisition nor resettlement of community members.			
5.0	Given that the locations of subprojects are not yet known at this stage of the project preparation, the scale-up project will update existing NFWP's Resettlement Framework (RF). The updated RF will facilitate ESS5 requirements under the NFWP-SU activities.	Before the completion of Appraisal	NPCU (Environmental and Social Team)
5.1	Prepare RAP(s), pay prompt compensation to PAPs, if applicable	Before start of civil works at impact location(s)	SPMU (E& S team)
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES The Project will not affect the biodiversity conservation and sustainable management of living resources in the Communities involved.			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES There are no Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the project area. Therefore, there are no mitigation measures to be undertaken under ESS7			
ESS 8: CULTURAL HERITAGE The Project will not affect the cultural heritage of the Communities involved.			
ESS 9: FINANCIAL INTERMEDIARIES The Project will not involve the use of financial intermediaries			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Prepare, adopt, disclose, and implement the Stakeholders Engagement Plan (SEP) consistent with ESS10 in a manner acceptable to the Bank, including GRM. The SEP will outline the characteristics and interests of the relevant stakeholder groups and the timing and methods of engagement throughout the life of the project.</p> <p>Ensure the implementation of the SEP which will be amended and updated as required during the Project implementation.</p>	<p>Before the completion of appraisal and throughout Project implementation</p> <p>During the scale up project preparation and implementation</p>	<p>NPCU (Environmental and Social Team)</p> <p>SPMU (E&S Team)</p>
10.2	<p>PROJECT GRIEVANCE MECHANISM: Strengthen the existing grievance redress system, establish, and operationalize the NFW-SU GRM/GRCS in line with the requirements of ESS10,</p>	<p>Before Project commencement and throughout Project implementation</p>	<p>NPCU, SPCUs, LGA, Community level</p>
CAPACITY SUPPORT (TRAINING)			
CS1	<ol style="list-style-type: none"> 1. ESF Capacity building 2- Specific aspects of social assessment, including GBV SEA/SH risks, impacts and mitigation measures 2. Implementation of a Grievance Redress Mechanism 3. How to conduct stakeholder engagement in light of COVID-19 4. Occupational Health and safety at work including those related to COVID-19, civil works and agricultural activities 5. Addressing SEA/SH issues in World Bank financed Projects 6. Security Protocol and Management 	<p>During Project implementation</p>	<p>NPCU E&S team and World Bank E&S Specialists</p>