



**THE WORLD BANK**  
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**THE NIGERIA FOR WOMEN  
PROJECT SCALE - UP  
(NFWP - SU)  
(P179447)**



**FINAL REPORT**  
FOR  
**ENVIRONMENTAL AND SOCIAL MANAGEMENT  
FRAMEWORK (ESMF)**

**DECEMBER, 2022**

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## **ACRONYMS AND ABBREVIATIONS**

<b>Acronym</b>	<b>Description</b>
AEAM	Adaptive Environmental Assessment and Management
AIDS	Acquired Immune Deficiency Syndrome
AP	Affected Person
ARAR	Applicable or Relevant and Appropriate Requirements
CBO	Community Based Organizations
CSDP	Community & Social Development Project
CO	Cleaner Operation
COVID19	Coronavirus 2019
dBA	A-weighted decibel
DDI	Diversity and Disaster Initiative
DHS	Demographic Health Survey
EA	Environmental Assessment
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EMS	Environmental Management System
EMSP	Environmental and Social Management Plan
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESS	Environmental & Social Standards
ESSF	Environmental and Social Screening Form
FCPF	Forest Carbon Partnership Facility
FGD	Focused Group Discussions
FGN	Federal Government of Nigeria
FMARD	Federal Ministry of Agriculture and Rural Development
FME/FMEnv	Federal Ministry of Environment
FMW	Federal Ministry of Works
FMWR	Federal Ministry of Water Resources
GEF	Global Environment Facility
GIS	Geographic Information Systems
GoN	Government of Nigeria
GM	Green Manager
GMC	Green Management Committee
GRC	Grievance Redress Committee
GRM	Grievance Re-dress Mechanism
HAP/HMP	Health Action Plan/Health Management Plan
HIA	Health Impact Assessment
HIV	Human Immunodeficiency Virus
HOD	Head of Department
HSE	Health Safety and Environment
IDA	International Development Association
IFC	International Finance Corporation
ILO	International Labour Organization
IMM	Impact Mitigation and Monitoring
IMT	Institute of Management and Technology
IPP	Indigenous Peoples Plan
IPPF	Indigenous Peoples Planning Framework
ITC	Instruction to Consultants
IWRMC	Integrated Water Resources Management Commission
JHA	Job Hazard Analysis
LGA	Local Government Area
LOI	Letter of Invitation
M&E	Monitoring and Evaluation
MDA	Ministry Departments and Agencies
MSD	Musculoskeletal Disorder
MSDS	Material Safety Data Sheets
NFWP	Nigeria for Women Project
NFWP-SU	Nigeria For Women Project Scale Up
PCU	Project Coordination Unit
NGO	Non-governmental Organization
NHSA	National Hydrological Services Agency

<b>Acronym</b>	<b>Description</b>
NISP	Nigerian Institute of Safety Professionals
NPE	National Policy on Environment
NWRI	National Water Resources Institute
OHS	Occupational Health and Safety
OHSMP	Occupational Health and Safety Management Plan
OHSRA	Occupational Health and Safety Risk Assessment
OP/BP	Operational Procedures/Bank Procedures
PAP	Project Affected Person
PC	Pollution Control
PCU	Project Management/Monitoring Unit
PPE	Personal Protective Equipment
RAP	Resettlement Action Plan
RBDAs	River Basin Development Authorities
RFP	Request for Proposal
SEA	Sexual Exploitation & Abuse
SH	Sexual Harassment
SME	State Ministry of Environment
SMARD	State Ministry of Agriculture and Rural Development
SMOH	State Ministry of Health
SMW	State Ministry of Works
SPCU	State Project Coordination Unit
SSA	Systematic Sequential Approach
STI	Sexually Transmitted Infection
TBD	To Be Determined
TOR	Terms of Reference
VAPP	Violence Against Persons Prohibition
VOC	Voice of Children
WAG	Women Affinity Groups
WASH	Water, Sanitation & Hygiene
WHO	World Health Organization



## **Executive Summary**

### **ES 1 Background**

The proposed NFWP-SU supports the Government's key programs aimed at improving women's well-being. It responds to a number of priorities highlighted in the Framework for Advancing Women's Financial Inclusion in Nigeria, and in Nigeria's National Gender Policy. These priorities include: (i) promoting the empowerment of women and integrating gender aspects in the areas of agriculture/rural development, environment/natural resources, health and reproductive health/rights, education/training and labor/employment; (ii) addressing demand-side barriers, including social norms, a lack of trust in financial service providers, and a lack of national identification numbers; (iii) sensitizing the population, especially men, to gender stereotypes and changing gender roles; and (iv) improving women's access to critical resources such as education, capital, entrepreneurial skills, and control over the use of their time and labor. It will also align with the objectives of the National Action Plan on Gender and Climate Change for Nigeria, including (i) increasing the understanding of climate change impacts among women, youth, and other vulnerable groups, and (ii) promoting the implementation of gender-responsive and sustainable adaptation and mitigation initiatives that will minimize risks associated with climate change while maximizing opportunities for women, men, youth, and other vulnerable groups.<sup>1</sup>

#### **Project description**

NFWP-SU builds on the successful Nigeria for Women Project (NFWP – P161364), which is currently being implemented in six states<sup>2</sup> across Nigeria. The original project tested the WAG model as a platform for addressing key constraints to women's social and economic empowerment at the societal, community, and household levels. This program will scale up NFWP and integrate lessons learned as it is expanded into a national program. The program is structured around three components. The first focuses on building community institutions by creating WAGs at the community level and federating these at higher levels (village level and local government area [LGA] level) to take advantages of economies of scale to build linkages to markets and access to finance. The second component supports improvement of livelihood opportunities for WAG members through Community Investment Fund (CIF) and livelihood collective (LC) grants to enable women to increase income and enhance livelihood opportunities. The third component covers project management, monitoring and evaluation, and adaptive learning.

#### **Objectives of the Nigeria-for women scale up project (NFWP-SU)**

To institutionalize Women's Affinity Groups and other platforms for women's economic empowerment and enhance the economic opportunities of unbanked women. The following key results will measure progress toward the Project Development Objective:

- (a) Number of women who are members of WAGs (disaggregated by state);
- (b) Number of WAGs that are in operation for more than one year;
- (c) Number of higher-level federations established and in operation for at least one year;
- (d) Policies and programs at the state level to support the functioning of WAGs;
- (e) Savings mobilized by WAGs per year before share out;
- (f) Number of unbanked women<sup>3</sup>; and
- (g) Increase in the number of livelihood sources per household.

#### **Component 1: Building Community Institutions (US\$168 million)**

This component aims to leverage existing practices of mutual help among women to address gender inequalities and create economic opportunities. Specifically, activities under this component will support the creation of WAGs that will build on practices of mutual help and leverage these as an institutional platform to support access to finance, enhance women's voice and agency, and drive behavior change. Activities under this Component will be implemented through three subcomponents: (i) Women Affinity Groups and Federations; (ii)

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<sup>1</sup> Federal Republic of Nigeria, Federal Ministry of Environment (2020) National Action Plan on Gender and Climate Change for Nigeria. [https://genderclimatetracker.org/sites/default/files/Resources/climate-change-and-gender-action-plan\\_nigeria.pdf](https://genderclimatetracker.org/sites/default/files/Resources/climate-change-and-gender-action-plan_nigeria.pdf)

<sup>2</sup> Abia, Akwa Ibom, Ogun, Niger, Kebbi and Taraba States.

<sup>3</sup> This indicator measures the Project's effect on the overall number of unbanked women in Nigeria (this is defined as women without bank accounts or mobile wallets, as measured in the Global Findex). The Project expects to open accounts or wallets for about 3.1 million women, therefore this would bring down the number of unbanked women in Nigeria from approximately 37 million to 34 million.

Platforms for Behavior Change in Health, Sanitation, and Climate Adaptation, and (iii) Influencing Social Norms.

**Subcomponent 1.1: Influencing Social Norms (US\$14.9 million equivalent)**

This subcomponent will finance Operational Project Communication (OPC), as well as activities to facilitate positive shifts in norms, behaviors, and attitudes to reduce gender stereotypes detrimental to women’s socioeconomic engagement, household decision-making, and resilience to climate change.

**Subcomponent 1.2: Women Affinity Groups and Federations (US\$144.4 million equivalent)**

As in the original project, this subcomponent is the core investment of the Project in developing and strengthening community institutions (WAGs, VOs, and CLFs) and will be implemented in a phased manner.

The Project will support strengthening the organizational capabilities of the VOs and CLFs in livelihood promotion, climate and disaster risk management, developing linkages with public and private service providers, and building a knowledge base and skills at the grassroots level by developing a cadre of good-quality community resource persons (CRPs)—community-managed bookkeepers, livelihood associates, and other VO- and CLF-level functionaries.

**Subcomponent 1.3: Platforms for Behavior Change in Health, Sanitation, and Climate Adaptation (US\$8.7 million equivalent)**

This subcomponent will finance the mobilization of mature WAGs, VOs, and CLFs as platforms for improving behaviors related to health, sanitation, and climate adaptation.

**Component 2: Livelihood Program (US\$272 million)**

This component aims to facilitate improvement in the livelihood opportunities of WAG members through the CIF and promotion of LCs.

**Subcomponent 2.1: Community Investment Fund (US\$176.2 million equivalent)**

A Community Investment Fund (CIF) is a grant to WAGs that will enable WAG members to invest in productive assets for low-carbon, climate-resilient livelihood activities at the household level based on Micro Investment Plans (MIPs).

**Subcomponent 2.2: Support to Livelihood Collectives (US\$79 million)**

The aim of this subcomponent is to leverage economies of scale and enhance the bargaining power of the WAG members and their households. This subcomponent will support the formation and strengthening of LCs and provide them with livelihood grants based on approved business plans.

**Subcomponent 2.3: Technical Assistance and Innovations for Livelihoods Programs (US\$16.8 million equivalent)**

The subcomponent will support improving the supply of key support and technical services for the community institutions and LCs in the areas of institution building, financial management/services, climate and disaster risk management and livelihood enhancement (including enhancing the climate resilience of livelihood activities).

**Component 3: Project Management, Monitoring and Evaluation, and Learning (US\$50 million)**

This component will finance project management, monitoring, evaluation, and learning at both federal and state levels and will build government capacity to facilitate the implementation of Project activities and consequently ensure sustainability.

The new aspects of the NFWP SU in comparison with the NFWP are:

- (i) **PDO** - To institutionalize Women’s Affinity Groups and other platforms of women’s economic empowerment and enhance the economic opportunities of unbanked women
- (ii) **Results Framework** - The Results Framework (RF) has been updated to reflect the impact of the scale up and expanded scope.
- (iii) **Institutional Arrangements** - The SU will use the same implementation arrangements as the present project at the Federal level. At the State Level there will be a Multisectoral

- Coordination Structure (MCS) as the steering committee and State Technical Committee (STC).
- (iv) **Project Implementation** - Technical Assistance Activities. Phased and performance-based approaches
- (v) **Project Components** - No standalone innovation and partnership component, however, livelihood component will be supported with, support services and linkages.
- Federations – VO and CLFs
  - Revolving seed grants – based on MIP, LEP
  - Citizens Engagement
  - Behaviour Change in Health, Sanitation, and Climate Adaptation
  - South – South Exchange
  - Digital Literacy
  - Climate Smart Activities

This document is an **Environmental and Social Management Framework (ESMF)** for the **Nigerian for Women Scale-up Project (NFWP-SU)**, which provides a detailed description of the project States and their prioritized sub-projects.

## **ES2 Purpose of ESMF**

The purpose of this ESMF is to establish the environmental and social safeguard policy framework, institutional arrangements, and capacity available to identify and mitigate potential E&S standards compliance issues and impacts of each subproject. It does not attempt to deal with site-specific impacts. The Bank will disclose the ESMF document on the World Bank external website before project appraisal.

### **Objectives of the Environmental and Social Management Framework**

The major developmental objective of the ESMF is to enable support for effective decision making in order to ensure that implementation processes during the execution of sub-project activities such as; construction, civil and rehabilitation works, agricultural activities are environmentally sound, encourage community consultation and participation, enhance social wellbeing and are sustainable. Specifically, this Environmental and Social Management Framework seeks to provide a clear process including action plans to integrate environmental and social considerations into the NFWP-SU.

This ESMF will be used by the NFWP-SU, in combination with a separate report providing a Resettlement Framework (RF) for the project. The RF provides a structure to address possible involuntary physical and economic displacement of the program's sub-project. In addition, the ESMF is accompanied by an Integrated Pest Management Plan (IPMP) for sub-projects with agricultural activities and a Labour Management Plan (LMP) for sub-projects with activities that create employment.

With regard to the ESMF, in seeking to implement the NFWP-SU project, the government of Nigeria intends to take into consideration the relevant state-owned laws, where the project will be executed and as well comply with all national and international environmental requirements in order to meet legal obligations and to ensure a sustainable project. This requires meeting the following objectives:

- ESIA/ESMP to meet Nigeria EIA laws
- ESIA/ESMP to meet World Bank EA guidelines and relevant Bank Environmental & Social Framework standards that have been triggered by NFWP-SU and by extension the NFWP-SU:
- Environmental and Social Standard 1 (ESS1): Assessment and management of Environmental and Social Risks and Impacts;
- Environmental and Social Standard 2 (ESS2): Labor and Working Conditions;
- Environmental and Social Standard 3 (ESS3): Resource Efficiency and Pollution Prevention and Management;
- Environmental and Social Standard 4 (ESS4): Community Health and Safety;
- Environmental and Social Standard 5 (ESS5): Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- Environmental and Social Standard 10 (ESS10): Stakeholder Engagement and Information Disclosure

As required by ESS10, NFWP-SU State Project Coordination Units (SPCUs) will disclose the ESMF as required by the Nigeria EIA public notice and review procedures as well as the World Bank Disclosure Policy.

### **Rationale for the ESMF Update Study**

The Environment and Social Management Framework (ESMF) has been developed to build upon the one prepared for the NFWP to address the environmental and social issues arising as a result of pursuing the NFWP-SU goals that now involve more States and new activities for facilitating 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.

Currently, the first phase of the project known as the Nigeria for Women Project (NFWP) was piloted by the following participating states (Akwa Ibom, Akwa Ibom, Edo, Kebbi, Niger, Ogun and Taraba), while the proposed NFWP-SU will be scaled up to 12 participating States. Therefore, the rationale for preparing this ESMF has not changed and is as follows:

The detailed operational activities/civil works of the NFWP-SU project are yet to be carried out. The bulk detailed project activities to be financed under the NFWP-SU are yet to be identified. The specific sites for each sub-project activities pertaining to NFWP-SU are not known. This ESMF does not attempt to address impacts related to individual sites in all the NFWP-SU study areas. However, issues on ways of integrating and management of social and environmental aspects of the sub-project components at all stages of the project planning, design, execution and operation of the entire NFWP-SU project were established.

### **Application of the ESMF**

Application of ESMF to the sub-projects enables preparation of a standardized environmental and social assessment documents for appraisal and implementation. For subprojects that will trigger significant environmental/social impacts it will be necessary to undertake the necessary environmental and social assessments, as mandated by the Environmental laws of Nigerian Governments (national and state) and conforming to the Environmental & Social Framework standards of the World Bank. The process for conformance to these procedures is defined in this framework. The criteria established shall enable the identification of such projects.

### **Approach and Methodology**

This ESMF has been prepared in accordance with standard procedures for environmental assessment including the applicable World Bank Environmental & Social Framework standards and Nigerian environmental assessment guidelines.

## **ES 3 Description of the current biophysical environment**

Details of the biophysical environment in the six different States representing the 6 geopolitical zones are contained in Chapter 3 of this ESMF.

## **ES 4 Policy and Regulatory Framework**

There are several national and international environmental guidelines in Nigeria that are applicable to the operation of the NFWP-SU. In Nigeria, the power to enforce all activities that might impact the environment is vested in the Federal Ministry of Environment (FMEEnv). The ministry has a mandate to co-ordinate environmental protection and conservation of natural resources for sustainable development in Nigeria.

One of the most relevant legislation of interest in the NFWP-SU project is the *Environmental Impact Assessment (EIA) Act No. 86 of 1992*. The Act makes EIA mandatory for any development project and prescribes the procedures for conducting and reporting EIA studies. It requires that development projects be screened for their potential impact. Based on the screening, a full, partial, or no Environmental impact assessment may be required. This is in agreement with the World Bank EA requirements for any development projects and her categorization (A, B, & C) of EA types. Furthermore, there are several relevant national and international environmental and social policies and regulations that are applicable to the NFWP-SU and its sub-projects. A number of other governments Ministries, Departments and Agencies (MDAs) have enabling laws, which support the objectives of this ESMF. Some of these laws also seek to eliminate or minimize environmental and social impacts of activities associated with their various functions.

Also, the World Bank provides a number of operational and E&S compliance standards as part of the ESF, which aim to prevent and mitigate undue harm to people and their environment in any development initiative involving the Bank. The Nigerian EIA Act and the World Bank Environmental & Social Framework standards are similar. ESS1 and Nigerian EIA Act are also similar. World Bank EA Screening Category A is similar to Nigerian EIA Act category I, World Bank's EA Category B is equivalent to Nigeria EIA Act Category II, World Bank EA Category C is equivalent to the Nigeria EIA Act Category III. However, in the event of divergence between World Bank Environmental & Social Framework standards and the Existing Environmental laws in Nigeria during the implementation of the NFWP-SU, the more stringent requirement will take precedence i.e., operationally, the World Bank may contact interested/affected parties to confirm the validity and determine whether or not the process and outcomes comply with ESS1.

#### **World Bank Environmental and Social Environmental & Social Framework standards**

The proposed scale-up project activities are not expected to have major adverse environmental and social impacts. Six of the ten Environmental and Social Standards (ESSs) are relevant to the NFWP-SU: ESS1 (Assessment and Management of Environmental and Social Risks and Impacts); ESS2 (Labor and Working Conditions); ESS3 (Resource Efficiency and Pollution Prevention and Management); ESS4 (Community Health and Safety); ESS5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement); and ESS10 (Stakeholders Engagement and Information Disclosure).

#### **Nigeria EIA Guidelines and World Bank EA Guidelines**

The Environmental Impact Assessment Act No. 86 of 1992 requires that development projects be screened for their potential impact. Based on the screening, a full, partial, or no Environmental impact assessment may be required. Guidelines issued in 1995 direct the screening process and provides guidelines that are captured in the subsequent section. Thus, for this ESMF, the Nigeria's EIA requirements and World Bank E&S standards were harmonised as far as possible, hence it is made responsive to the objectives of good practice.

#### **Screening Process**

The objective of screening is to determine the appropriate level of environmental and social impact assessment and management for a proposed subproject. Environmental and Social screening process distinguishes sub-projects and activities that will require thorough environmental review to prevent/mitigate negative environmental impacts or those which will provide opportunities to enhance positive impacts. The screening process is presented in detail in section 4.7.1 of this ESMF.

#### **NFWP-SU - Adequacy of Legal Instruments for Environmental & Social Issues**

There are guidelines to ensure that the project succeeds from an Environmental and Social perspective. The main challenge would be enforcement of these legislation/guidelines, since most State Government-owned projects, for instance, rarely or are not accustomed to using EA tool for state-owned project.

### **ES 5 Environmental & Social impacts**

Any sub-project under the NFWP-SU, whether it is simple and small, or large and complex could have some level of impacts on the environment and socioeconomics. The environmental & social impacts may be of different dimensions (beneficial or adverse, primary or secondary, synergistic or cumulative etc). However, the main objective of impact identification especially with emphasis to the NFWP-SU is to identify and prioritize areas that are likely to be affected by the implementation of sub-projects and offer suitable mitigation measures. Environmental and social impacts, by definition, imply an alteration of environmental conditions or creation of new sets of adverse or beneficial environmental and social consequences caused by the action under consideration.

#### **Potential Impacts Identification of the Proposed Project**

For the identification of potential impacts of sub-projects with significant environmental and social issues, the most useful tool for identifying, assessing, and managing the impacts of the NFWP-SU will be facilitated by undertaking an Environmental and Social Impact Assessment (ESIA) with rigorous scientific analysis and stakeholder engagement. This

analysis may entail comprehensive baseline assessment based on standard scientific methods.

### **Phases of the NFWP-SU Project**

For the purpose of this work, identified impacts that are likely to be associated with the NFWP-SU projects have been classified to occur in four (4) phases for the lifespan of the works. The phases include:

- Preparatory/pre-construction phase
- Implementation/construction phase
- Operational/Maintenance phase
- Demobilisation phase

### **Type of Impacts and their Consideration as Perceived Under the NFWP-SU**

Even though most NFWP-SU project activities are expected to have environmental and social issues (risks and impacts) that are manageable through standards and codes of practice such as environmental, health & safety guidelines, company code of conduct on preventing GBV, managers code of conduct against preventing GBV, individuals code of conduct against preventing of GBV, etc.

### **Potential Positive Impacts**

The NFWP-SU project will develop and strengthen new and existing WAGs and Federation with a strong livelihood focus to enhance household income. The NFWP SU would be a real boost to the economy of the communities by facilitating 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. Thus, interventions through NFWP-SU will, in general, shall provide real benefits to most, if not all, socioeconomic groups, including the poor. Some of the beneficial impacts associated with the project are presented in Table ES1:

**Table ES1: Potential Positive Impacts of the NFWP-SU Project**

<b>No.</b>	<b>Impact</b>	<b>Beneficiaries</b>	<b>Project Benefits</b>
1	The project will create an enabling environment to ensure the buy-in of key stakeholders and provide adequate support at the household level	Key stakeholders and beneficiaries of the projects	Will facilitate investments focused on women
2	The project will build capacity	Women Affinity Groups (WAGs)	Improvement in life skill development Financial literacy improvement skills Enterprise training
3.	Strengthening of economically active beneficiaries & target value chains	Women Affinity Groups (WAGs)	Livelihood grants and holistic as well as targeted skills trainings to include psycho-emotional entrepreneurship, market responsive technical skills, competencies, and life skills; based on sound analysis of the value chains and market demand.
4.	Transform women's social and livelihood outcomes	Women in target communities	Improvement in project delivery and overall impact, through support of innovations  Improve standard of living of the rural women by enhancing their access to social and financial capital
5.	Stakeholders' engagement	State Government, LGAs	Improvement of public goodwill and satisfaction towards governance in States.

No.	Impact	Beneficiaries	Project Benefits
6.	Improvement in management of resources	Target Communities, State Government, MDAs	Provision of a lead way to drive the State Government towards ensuring improved development of women's livelihood outcomes
7.	Capacity building and strengthening of institutions	State Government, MDAs	Capacity building through: Strengthening of supervision systems of personnel involved in sub-project activities, including improvement in institutional responsibilities for construction and maintenance. Transfer of skills

### **Potential Adverse Impacts**

Implementation of NFWP-SU could exert some negative impacts on the social and physical environment within the communities, in which they are implemented. The potentially significant adverse impacts that would result from the project are expected to be site-specific, noncumulative, and relatively easy to mitigate to acceptable levels. They are:

### **Environmental Impacts**

- **Air Pollution** – Includes the activities that promote the release or emission of gases that affect air quality and may be harmful to people & the environment.
- **Occupational Health & Safety** – The practices & measures undertaken to on the project that are involved with how activities are carried out in a way that it does not cause harm or injury to people.
- **Waste** – Including the waste generated by different activities of the subprojects such as organic waste & wastewater discharge from processing machinery, and how the waste is managed.
- **Climate Change** – includes all activities that may reduce or deepen climate change by influence on the carbon or water cycle.
- **Erosion** – these are the erosion events that occur or may be triggered to occur from the vulnerability of terrain to activities from the project.
- **Environmental Degradation & land use** – activities that are carried out on this project that will promote a decline in the natural environmental conditions.
- **Communicable diseases** – includes activities that may promote the transmission of communicable diseases, including COVID-19.
- **Security** – includes the activities that will be carried out in locations that present security challenges to the sub-projects.

### **Social Impacts**

Social impacts can be subdivided into the following:

- **Demographic impacts** - such as displacement and relocation effects; and changes in population characteristics,
- **Socio-economic impacts** - including income and income multiplier effects, employment rates and patterns, effects on prices of local goods and services, and taxation effects,
- **Cultural impacts** - traditional patterns of life and work, family structures and leadership, religious and tribal factors, archaeological features, social networks and community cohesion,
- **Institutional impacts** - including demands on the government and social service, NGOs housing, schools, criminal justice, health, welfare and recreation, and
- **Gender impacts** - the implications of the sub-projects on the roles of women in society, income-generating opportunities, access to resources, employment opportunities and equity.

Analysis of social impact is a proactive approach carried out for better developmental outcomes, not just the identification or amelioration of negative or unintended outcomes but assisting communities and other stakeholders to identify goals and ensuring that positive outcomes are maximized. In the analysis of the social impacts, the following socio-cultural parameters shall also be considered:

- Quality of life,
- Social organisation and structures,

- Cultural life, including language, rituals and general lifestyle. A cultural life makes a social group immediately recognisable as being distinct from other groups, and
- Dispute-resolution institutions and processes; relationships between generations and value systems

#### **ES 6 Environmental and Social Management Plan**

The Environmental and Social Management Plan (ESMP) is a detailed plan that consists of a set of specific mitigation, monitoring and institutional measures to be taken during the implementation and operation, necessary to minimize, mitigate or control any potential negative environmental and social impacts identified under the NFWP-SU.

#### **ES 7 Institutional Arrangements**

It is necessary to highlight and define the roles, responsibilities and institutional arrangements for the implementation of the NFWP-SU, as they are fundamental to the effective implementation of the environmental and social safeguard measures outlined in this ESMF. Consequently, the institutional arrangement is building upon the existing PIU for the NFWP according to the details presented in Table ES1. The various institutions in the implementation of the ESMF are presented in Chapter 7.

#### **ES8 Grievance Redress Mechanism (GRM)**

To ensure social accountability, inclusion, sustainability and transparency in the implementation activities, the NFWP established a mechanism to receive and act on complains and grievances by beneficiaries, stakeholders or project affected persons (PAPS) against activities being conducted by the Project in the State. This mechanism will remain operational under the SU. The GRM approach for the NFWP-SU is presented in Chapter 8.

#### **ES9 Capacity Building and Training**

One of the major challenges faced to date under the NFWP is the lagging capacity at Federal level to provide technical expertise and support to the States. Therefore, for the SU, in order to achieve the goal of the ESMF, there is an urgent need for capacity building and strengthening of relevant competencies on environmental and social management at Federal, States, LGAs and community levels including contractors. To this end, capacity building will include more refresher trainings for the Federal and State level staff and also training of personnel from the new States. The budget for implementing the ESMF is presented in Table ES2.

**Table ES2: Estimated Annual Budget to Implement ESMF**

<b>1</b>	<b>ESMF Requirements</b>	<b>Considerations</b>	<b>Total Cost per State (N)</b>	<b>Total (\$)</b>
<b>A</b>	<b>Training &amp; Capacity Strengthening</b>			
i.	Capacity Building for FPCU & SPCU Personnel	Refresher training programs	3,000,000.00	6,742.00
	Capacity Building for FPCU & SPCU Personnel	Workshops to be held in individual States.	12,000,000.00	26,966.00
Ii	Equipment	FPCU & SPCU	9,500,000.00	21,348.00
<b>B</b>	<b>Mitigation &amp; Management</b>			
i.	Engagement of Environmental and Social Specialists	Preparation & Management of Safeguard Instruments	As contained in item 3 below.	
ii.	Establish Environmental & Social measures for mitigation of E&S Issues during operations	Safeguard Instruments	15,000,000.00	33,708.00
<b>C</b>	<b>Environmental &amp; Social Monitoring</b>			



<b>1</b>	<b>ESMF Requirements</b>	<b>Considerations</b>	<b>Total Cost per State (N)</b>	<b>Total (\$)</b>
i.	Monitoring Compliance with EMP on E&S Issues during pre-operations activities	Assume quarterly monitoring activities over 5 days each quarter per year	2,000,000.00	4,494.00
ii.	Routine field visits for inspections of E&S compliance Unit	To cover transport, accommodation and daily allowances	1,500,000.00	3,371.00
<b>D</b>	<b>GBV Monitoring</b>			
	Routine field visits for inspections of GBV compliance Unit	To cover transport, accommodation and daily allowances	4,500,000.00	10,112.00
	<b>Total Estimated Budget</b>		<b>47,500,000.00</b>	<b>106,742.00</b>
<b>Contingency</b>		<b>10% of sub-total</b>	4,750,000.00	10,674.00
<b>Total (for 1 State)</b>			<b>52,250,000.00</b>	<b>117,416.00</b>
<b>Total for 12 States</b>			<b>627,000,000.00</b>	<b>1,408,989.00</b>

\$1.00 = ₦445.00 (CBN rate of December 5, 2022)

In this budget, the following estimates have been considered:

- The budget for equipment for the FPCU and SPCU is captured in the estimate.
- GRM estimates has not been captured under this budget
- This estimate has captured cost of implementation of LMP
- This budget does not include the cost for implementation of the SEP
- This budget does not include the cost for implementation of the RF
- Budget for the appointment of NGO to monitor GBV/SEA in NFWP-SU is included

#### **ES 10 Stakeholder Engagement & Public Consultations**

The GoN recognizes the importance of open and transparent engagement between the NFWP-SU and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. The NFWP-SU will be guided by the standalone stakeholder engagement plan prepared in compliance with ESS10 guidelines.

##### **Objectives of Public Consultations**

In preparing this update, this ESMF provides a framework for building upon the effective stakeholder participation strategy established under the NFWP and through this, promote greater awareness and understanding of issues so that the project is carried out effectively within budget and on-time to the satisfaction of all concerned. This minimizes the risk of conflict which could impede the successful completion of the project. To ensure effective implementation of this plan, the SPCU and relevant authorities involved in the project shall be committed to the following principles:

- promoting openness and communication.
- increasing public knowledge and understanding of the project implementation process;
- ensuring effective stakeholder participation in the development of the project;
- using all strategies and techniques which provide appropriate, timely and adequate opportunities for all stakeholders to participate; and
- evaluating the effectiveness of the engagement plan in accordance with the expected outcomes.

##### **Stakeholder Consultation**

Consultations are an important tool in identifying the major environmental and social issues that form a vital aspect of the preparation of this ESMF and some of the key stakeholders that were identified for consultations included stakeholders from participating States NFWP-SU Project Implementation Unit, the representatives from the State Ministries of Environment, State Ministries of Environment and State Ministries of Women Affairs. Some of the issues identified during consultations in participating States is summarized in Table ES 4 as follows:

<b>Table ES4: Summary of Stakeholders Consultations</b>		
<b>Date</b>	<b>23<sup>rd</sup> November, 2022</b>	
<b>Venue</b>	Virtual stakeholder meeting organised by the NFWP & World Bank team	
<b>Total stakeholders</b>	68 stakeholders from 20 States	
<b>In Attendance</b>	<b>Stakeholders in attendance:</b> Honourable Commissioners, permanent secretaries, directors of planning, heads of research of Ministries of Women Affairs, Ministry of Environment, Lands & Justice.	
<b>Language of communication</b>	English Language, Hausa Language and Pidgin English	
<b>Introduction</b>	The TTL for NFWP SU carried out the introductions and welcomed everyone to the meeting. The Head of Personnel for the FPCU welcomed the participants and explained to the forum the NFWP project and objectives. She further discussed the NFWP scale up and the major purpose for the consultations to the stakeholders as a need to have the inputs of the participating States in the preparation of key environmental & social safeguard instruments; ESMF, IPMP, RF and SEP, which are to define, guide and strengthen E&S performance on the Nigeria for Women Project Scale up.	
<b>Perception about the Project</b>	The perception of the project was positive. The new participating States expressed their delight in being a part of the project, while the States that were a part of the former project also expressed their pleasure in being a part of the second phase.	
<b>Some Environmental &amp; Social Challenges</b>	The head of the Federal safeguards team for the NFWP, the National GBV advisor, discussed the overall E&S rating for the project is moderate and purpose of environmental & social safeguards is necessary to ensure that projects do not adversely affect receiving environments or the people that make up the societies within them. This is the reason why the documents under preparation are vital for taking E&S related decisions on this project.	
<b>Feedback</b>		
<b>Issues raised by</b>	<b>Concerns, Questions and Clarifications</b>	<b>How this was addressed</b>
<b>General issues discussed by the Consultant</b>	<b>Environmental Legislation</b> Do the participating States have any mandates regarding environmental protection and how are they pursued?	The participating States indicated that majority of them have environmental laws in place at State level and also, by domestication of the Federal law ( <i>Environmental Impact Assessment (EIA) Act No. 86 of 1992</i> ) In addition, the ministries have departments that are mandated to enforce the laws on the management of waste in their respective States, thereby ensuring that the legal framework is in place for implementing E&S performance under the NFWP SU.
	<b>Social legislation</b> Do the participating States have any mandates regarding social protection and how are they pursued?	Some of the States such as Nasarawa have domesticated the Child Rights Act (CRA, 2003), and the Violence Against Persons Prohibition Act (VAPP, 2015).
	<b>Grievance redress</b> For the NFWP, how were grievances addressed?	The grievance redress mechanism (GRM) and the Security Management Plan (SMP) at FPCU level have been effective in addressing issues in the first phase of NFWP and will provide a good foundation for the NFWP SU.
	<b>Social &amp; religious barriers</b> Do barriers exist for women that will affect their access to land?	It was unanimously agreed among the representatives of the different States that access to land for women is not a major problem in any of the States. In the past, some cultural barriers existed, for example, in the South East where traditional norms & customs operated for generations were

		impediments to women's development. However, this is no longer a barrier. In the opinion of the participants, the major barrier to women's development is now empowerment, especially access to finances for purchase of land or ownership
	<b>Agricultural activities &amp; pest control</b>	Regarding the agricultural activities that are currently being carried out by women in their States, Lagos noted that the State has women that are already involved in the cultivation of cassava & melon, while piggery and fish farming are also practiced. Bayelsa also has women engaged in fish farming. In addressing pest problems associated with such activities, Ogun State explained how they practice crop rotation as a cultural method to address pest problems. This indicates their understanding of the problems associated with such activities.
	<b>Capacity</b> Do the States possess sufficient capacity to implement this ESMF?	FPCU has carried out training of personnel under the first phase and there is sufficient capacity in these States to implement the ESMF, IPMP, RF and SEP for the SU. This training will continue into the second phase for all the participating States.

#### **ES 11 ESMF Monitoring & Evaluation**

The approach that will guide the monitoring and evaluation process under the NFWP-SU in operationalizing this ESMF identifies the following objectives:

- To alert the PCU by providing timely information about the success or otherwise of the environmental & social management process outlined in the ESMF. This will ensure continuous improvement in the environmental and social management process of the NFWP-SU even after the project is concluded.
- It will determine where gaps may exist between implementation targets and actual project accomplishments.
- To make a final evaluation in order to determine whether the mitigation measures incorporated in the technical designs and the ESMP have been successful.
- Monitoring of environmental and social indicators will be mainstreamed into the overall monitoring and evaluation system for the project.
- Reporting will be on a biannual basis for the duration of the project

#### **Disclosures of ESF Instruments**

The ESMF has been prepared in consultation with the FPCU, including the SPCUs of participating States, relevant state MDAs, CBOs/NGOs, women groups & project affected persons. Copies of this ESMF, like other safeguard instruments (such as ESIA/ESMPs etc.) that would be prepared for the NFWP-SU and its sub-projects will be made available to the public by the NFWP-SU FPCU and on the WB website.

## **CHAPTER ONE**

### **PROJECT DESCRIPTION**

#### **1.1 Background**

Over the past three decades, the Government of Nigeria's commitment to supporting the social and economic empowerment of women and fostering gender equality has grown demonstrably. The Federal Ministry of Women Affairs (FMWA) was established in 1995 as an institutional home for addressing women's issues in Nigeria. Chapter IV, Section 42 (1), (a) and (b); (2); and (3) of the 1999 Constitution of Nigeria calls for non-discrimination based on gender, religion, ethnicity, age, or circumstance of birth. In 1985, Nigeria ratified the United Nations Convention on the Elimination of all Forms of Discrimination against Women; and in 2004, it ratified the Women's Rights Protocol of the African Charter.

In addition, the Government has put in place key programs and strategies aimed at improving the lives of Nigerian women and has increased budgetary allocations to the ministries responsible for health and education programs aimed at girls and young women. Critical strategies, such as the Buhari Plan for the reconstruction of the Nigerian northeast, have paid particular attention to the specific needs of women.

The NFWP-SU supports the Government's key programs aimed at improving women's well-being. It responds to a number of priorities highlighted in the Framework for Advancing Women's Financial Inclusion in Nigeria, and in Nigeria's National Gender Policy. These priorities include: (i) promoting the empowerment of women and integrating gender aspects in the areas of agriculture/rural development, environment/natural resources, health and reproductive health/rights, education/training and labor/employment; (i) addressing demand-side barriers, including social norms, a lack of trust in financial service providers, and a lack of national identification numbers; (iii) sensitizing the population, especially men, to gender stereotypes and changing gender roles; and (iv) improving women's access to critical resources such as education, capital, entrepreneurial skills, and control over the use of their time and labor. It will also align with the objectives of the National Action Plan on Gender and Climate Change for Nigeria, including (i) increasing the understanding of climate change impacts among women, youth, and other vulnerable groups, and (ii) promoting the implementation of gender-responsive and sustainable adaptation and mitigation initiatives that will minimize risks associated with climate change while maximizing opportunities for women, men, youth, and other vulnerable groups.<sup>4</sup>

##### **1.1.1 Project Development Objectives of the Nigeria For Women Project (NFWP-SU)**

The Project Development Objective (PDO) of the NFWP-SU is to institutionalize Women's Affinity Groups and other platforms for women's economic empowerment and enhance the economic opportunities of unbanked women. The following key results will measure progress toward the Project Development Objective:

- (h) Number of women who are members of WAGs (disaggregated by state);
- (i) Number of WAGs that are in operation for more than one year;
- (j) Number of higher-level federations established and in operation for at least one year;
- (k) Policies and programs at the state level to support the functioning of WAGs;
- (l) Savings mobilized by WAGs per year before share out;
- (m) Number of unbanked women<sup>5</sup>; and
- (n) Increase in the number of livelihood sources per household.

#### **1.2 Project Description**

The NFWP-SU builds on the successful Nigeria for Women Project (NFWP – P161364), which is currently being implemented in six states<sup>6</sup> across Nigeria. The original project tested the WAG model as a platform for addressing key constraints to women's social and economic

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<sup>4</sup> Federal Republic of Nigeria, Federal Ministry of Environment (2020) National Action Plan on Gender and Climate Change for Nigeria. [https://genderclimatetracker.org/sites/default/files/Resources/climate-change-and-gender-action-plan\\_nigeria.pdf](https://genderclimatetracker.org/sites/default/files/Resources/climate-change-and-gender-action-plan_nigeria.pdf)

<sup>5</sup> This indicator measures the Project's effect on the overall number of unbanked women in Nigeria (this is defined as women without bank accounts or mobile wallets, as measured in the Global Findex). The Project expects to open accounts or wallets for about 3.1 million women, therefore this would bring down the number of unbanked women in Nigeria from approximately 37 million to 34 million.

<sup>6</sup> Abia, Akwa Ibom, Ogun, Niger, Kebbi and Taraba States.

empowerment at the societal, community, and household levels. This program will scale up NFWP and integrate lessons learned as it is expanded into a national program. The program is structured around three components. The first focuses on building community institutions by creating WAGs at the community level and federating these at higher levels (village level and local government area [LGA] level) to take advantages of economies of scale to build linkages to markets and access to finance. The second component supports improvement of livelihood opportunities for WAG members through Community Investment Fund (CIF) and livelihood collective (LC) grants to enable women to increase income and enhance livelihood opportunities. The third component covers project management, monitoring and evaluation, and adaptive learning.

The Nigeria for Women Project (NFWP) was piloted by 6 participating states. The proposed NFWP-SU will scale up NFWP to include 12 participating States in the Six Geopolitical zones in Nigeria, with possibilities of additional 13 states joining the project.

### **1.2.1 Project Components**

The NFWP-SU scale-up has the following components:

#### **Component 1: Building Community Institutions (US\$168 million)**

This component aims to leverage existing practices of mutual help among women to address gender inequalities and create economic opportunities. Specifically, activities under this component will support the creation of WAGs that will build on practices of mutual help and leverage these as an institutional platform to support access to finance, enhance women's voice and agency, and drive behaviour change. Activities under this Component will be implemented through three subcomponents: (i) Women Affinity Groups and Federations; (ii) Platforms for Behavior Change in Health, Sanitation, and Climate Adaptation, and (iii) Influencing Social Norms.

##### **Subcomponent 1.1: Influencing Social Norms (US\$14.9 million equivalent)**

**This subcomponent will finance Operational Project Communication (OPC), as well as activities to facilitate positive shifts in norms, behaviors, and attitudes to reduce gender stereotypes detrimental to women's socioeconomic engagement, household decision-making, and resilience to climate change.** The OPC will have an overall objective of awareness generation and will leverage communication tools and activities to strategically support and strengthen achievement of the PDO and to disseminate project information, including project intended activities and benefits. This will enhance project buy-in and facilitate the identification of project "champions" at the federal, state, LGA, and community levels. Given the scope of the Project, the approaches to shifting social norms will entail investment in two types of approaches: (i) foundational social and behaviour change communication (SBCC) approaches to support an enabling environment for WAGs and related activities in all Project areas; and (ii) targeted pilots to explore opportunities for structural community-based social norms approaches to create synergies with WAG activities.

**Subcomponent 1.2: Women Affinity Groups and Federations (US\$144.4 million equivalent) As in the original project, this subcomponent is the core investment of the Project in developing and strengthening community institutions (WAGs, VOs, and CLFs) and will be implemented in a phased manner.** The first phase will involve building and strengthening self-managed WAGs at the community level as primary institutions for women. These groups will serve as platforms for investments under Component 2, including by facilitating participatory microplanning processes at the community level. During the second phase, these primary-level WAGs will be federated to form VOs made up of 8–15 WAGs. The third phase will involve supporting VOs to aggregate as CLFs of 5–20 VOs at the LGA level. These federations will provide the scale to enable cost-effective linkages for technical services and markets under Component 2 to support income generating activities and livelihood enhancement. The community institutions will also be provided with skills and tools to develop social accountability mechanisms to enable transparency and good governance and build effective service delivery partnerships with local government. The component will also facilitate peer-to-peer communication among WAG members on issues affecting social and economic activities of interest to women, as well as issues related to supporting resilience to climate-related shocks and stressors and adaptation to changing conditions over time.

### **Subcomponent 1.3: Platforms for Behavior Change in Health, Sanitation, and Climate Adaptation (US\$8.7 million equivalent)**

This subcomponent will finance the mobilization of mature WAGs, VOs, and CLFs as platforms for improving behaviors related to health, sanitation, and climate adaptation. A comprehensive and context-specific information, education, and communication curriculum will be delivered<sup>7</sup> to the community institutions focused on improving RMNCH-N, dietary and care practices, and care-seeking behaviors. The curriculum will aim to improve knowledge of safe practices before, during, and after pregnancy; adequate maternal, infant, and young child feeding/nutrition practices; and knowledge on community management of childhood illnesses, including identifying danger signs and seeking care at appropriate points of care. The climate adaptation curriculum will focus on creating awareness among WAG members of current and future climate change risks, drivers of vulnerability, and the measures they can take to pro-actively respond to climate-related shocks and stressors and adapt to climate change. The sanitation and hygiene curriculum will focus on the linkages between using a toilet, the safe disposal of faeces, climate change-induced endemics, and hygiene and health. As community institutions continue to mature, they will begin to implement behaviour change strategies in these key areas in their communities. This may include raising awareness of climate change risks through community training that includes climate-smart practices and strategies and resources to support disaster risk management, including preparedness and responses to climate-related shocks. These additional training opportunities and responsibilities also provide a soft incentive for community institutions to continue meeting.<sup>8</sup>

### **Component 2: Livelihood Program (US\$272 million)**

This component aims to facilitate improvement in the livelihood opportunities of WAG members through the CIF and promotion of LCs. Beneficiaries would include PGs, CIGs, FAs, and PCs, among others. The aim of this component is to (i) finance income-earning productive assets for WAG members and (ii) provide low-carbon, climate-resilient production enhancement services and market linkage by supporting LCs across farm and nonfarm activities. It will also finance the formation or identification of LCs that include WAG members and support them through grants to engage in aggregation and establishing LCs in selected climate-smart value chains. This component will consist of three subcomponents: (i) Community Investment Fund, (ii) Support to Livelihood Collectives, and (iii) Technical Assistance and Innovations for Livelihoods Programs.

#### **Subcomponent 2.1: Community Investment Fund (US\$176.2 million equivalent)**

A Community Investment Fund (CIF) is a grant to WAGs that will enable WAG members to invest in productive assets for low-carbon, climate-resilient livelihood activities at the household level based on Micro Investment Plans (MIPs). Some of the key elements that could be supported using the CIF include income generation and livelihood improvements, consumption needs, and training/skill development to increase employment. Up to 12 percent of the CIF given to a WAG can be used to support their social fund, which is utilized by WAG members to address emergency needs, shocks (including climate shocks), etc.

CIF will be transferred to WAGs as a grant to supplement their existing loan fund. The WAG is expected to use this resource as a revolving fund to finance various WAG members' MIPs. The WAG will be free to fix terms and conditions under which the resource will be disbursed to WAG members. This revolving fund, combined with the savings of WAGs, is expected to multiply the Project funds, thus increasing overall fund availability for the WAG members. The experiences gained by WAGs in using these funds will increase the creditworthiness of the WAG members and open opportunities to leverage greater investment from other financial institutions. Some of the activities that the CIF will support are: (i) new asset creation for WAG members; (ii) diversification of livelihood opportunities for WAG members; (iii) increasing climate resilience of livelihood activities; and (iv) increasing household income by way of increased conversion of assets to incomes. The project is not going to

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<sup>7</sup> This subcomponent will also benefit from the grant which is adapting curricula and modules for training WAG members as frontline health champions and developing a Training of Trainers approach, all of which can be used in the NFWP SU. The grant will first test and pilot the approach of layering health interventions on to WAGs in some of the original NFWP states to provide key lessons for scaling the approach under the NFWP SU. Therefore, this subcomponent will not need to finance development of curricula, etc.

<sup>8</sup> The more cycles WAGs and their federations engage in, the more likely it is that the institutions will endure beyond the life of the Project.

provide financial intermediation through financial institutions to federations, WAGs, or livelihood collectives. In the event of a change in the design over the life of the project, which would include financial intermediation using project funds, a FIF review, and management approval would be required before such use of funds could commence.

**Subcomponent 2.2: Support to Livelihood Collectives (US\$79 million)**

**The aim of this subcomponent is to leverage economies of scale and enhance the bargaining power of the WAG members and their households.** The focus will be on (i) facilitating access to quality inputs, production practices, and technical services; (ii) assessing and scaling up low-carbon, climate-resilient livelihood activities of WAG members around selected commodities; (iii) financing productive partnerships for the development of market linkages; and (iv) promoting innovation and new technologies, including climate-smart interventions.<sup>9</sup>

**This subcomponent will support the formation and strengthening of LCs and provide them with livelihood grants based on approved business plans.** This will be complemented by technical assistance support under subcomponent 2.3. The subcomponent will support LCs that include WAG members and are engaged in specific commodities across agriculture, livestock, poultry, fisheries, horticulture, and nonfarm subsectors.

**Subcomponent 2.3: Technical Assistance and Innovations for Livelihoods Programs (US\$16.8 million equivalent)**

**The subcomponent will support improving the supply of key support and technical services for the community institutions and LCs in the areas of institution building, financial management/services, climate and disaster risk management and livelihood enhancement (including enhancing the climate resilience of livelihood activities).** Key activities that this subcomponent could support include: (i) capacity building by NGOs, (ii) technical assistance on financial management aspects to WAGs to undertake revolving fund management, and (iii) business development services through public, cooperative, and private sector initiatives (including NGOs and nonprofits) in agriculture, livestock, and nonfarm sectors, including training on climate risks and capacity building on how to enhance the climate resilience of livelihood activities. The subcomponent will also be used for encouraging innovation by individuals, enterprises, organizations, and institutions in the public and private sectors aimed at improving women's economic empowerment and livelihoods.

**Component 3: Project Management, Monitoring and Evaluation, and Learning (US\$50 million)**

**This component will finance project management, monitoring, evaluation, and learning at both federal and state levels and will build government capacity to facilitate the implementation of Project activities and consequently ensure sustainability.**

**Project management and coordination at federal and state levels include** general project management as well as procurement, financial management, environmental and social risk management, and a grievance redress mechanism (GRM).<sup>10</sup> In addition, the component will include TA to the FPCU to provide quality assurance support to the implementing states, helping them to manage inputs and requests from the large number of expected State Project Coordinating Units (SPCUs), as well as provide quality assurance to ensure fidelity of the NFWP model across the states. Under project coordination, FMWA and SMWAs will be strengthened and encouraged to work with other ministries, departments, and agencies (MDAs) and key partners for effective implementation of the

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<sup>9</sup> Indicative list of climate smart interventions: rainwater harvesting, drip irrigation, use of drought tolerant varieties of crops, use of early maturing varieties of crops, soil and water conservation through mulching, intercropping with legumes, weather-based crop advisory, sustainable land use and land management, use of fuel efficient stoves, use of briquettes to conserve deforestation etc.

<sup>10</sup> The Project will continue to implement a robust GRM based on that of the original project, which allows beneficiaries and other stakeholders to provide feedback and share concerns via multiple channels, including in person, by toll-free hotline, and in writing. The GRM was also designed to intake GBV and SEA/SH complaints and properly channel these through the GBV referral pathways that have been developed under the original project.

project (e.g., multi-sectorial institutions and agencies, development partners, CBN, and financial institutions).

The new aspects of the NFWP SU in comparison with the NFWP are:

- i. **PDO** - To institutionalize Women's Affinity Groups and other platforms of women's economic empowerment and enhance the economic opportunities of unbanked women.
- ii. **Results Framework** - The Results Framework (RF) has been updated to reflect the impact of the scale up and expanded scope.
- iii. **Institutional Arrangements** - The SU will use the same implementation arrangements as the present project at the Federal level. At the State Level there will be a Multisectoral Coordination Structure (MCS) as the steering committee and State Technical Committee (STC).
- iv. **Project Implementation** - Technical Assistance Activities. Phased and performance-based approaches.
- v. **Project Components** - No standalone innovation and partnership component, however, livelihood component will be supported with, support services and linkages.
  - Federations – VO and CLFs
  - Revolving seed grants – based on MIP, LEP
  - Citizens Engagement
  - Behaviour Change in Health, Sanitation, and Climate Adaptation
  - South – South Exchange
  - Digital Literacy
  - Climate Smart Activities

The NFWP-SU Project is implemented under the World Bank's Environmental and Social Framework and its Environmental and Social (E&S) Risks are rated Moderate.

This document presents the Environmental and Social Management **Framework (ESMF)** for the **Nigeria For Women Scale-up Project (NFW-SU)**, which provides a detailed description of the project States and their prioritized sub-projects. This document builds upon the NFWP and also includes the new States that will be participating in the project and provides information on the stakeholder/community consultation processes that build upon the established consultation strategies and documented responses, identification of potential and adverse environmental and social impacts, ESMP implementation, generic Environmental and Social Management Plan and annexure.

### **1.3 NFWP-SU Implementation Organisation Structure**

The implementation structure of this ESMF are:

#### **1.3.1 World Bank (WB)**

The World Bank will function in the capacity of "*Project Donor*". The Bank will lay the benchmarks for all environmental and social issues concerned with the development and implementation of NFWP-SU activities. It will provide overall supervision, facilitation and co-ordination of the NFWP-SU. It will also monitor funds and funds allocations; and project performance indicators.

#### **1.3.2 Federal Ministry of Environment (FMEnv)**

The ministry will function in the capacity of the Federal Republic of Nigeria (*The NFWP-SU*). It will be the responsible institution for implementing the NFWP-SU in Nigeria. The ministry will also facilitate liaisons with all MDAs that are to be involved in the NFWP-SU and ensure that every effort is made to enhance the positive impacts of the project and reduce/mitigate negative project impacts. The Environmental Assessment Department of the Federal Ministry of Environment will ensure that all project/sub-project ESIA's meet international "best practices" and NESREA, will regulate and enforce the implementation of all ESMPs developed for the NFWP-SU.

#### **1.3.3 NFWP-SU Project Coordinating Unit (Federal) - FPCU**

The SU will use the same implementation arrangements as the present project at the Federal level and will be integrated with the FPCU of the NFWP.



**1.3.4 NFWP-SU PCU (State) - SPCU**

The participating States NFWP-SU SPCU will co-ordinate implementation of NFWP-SU activities at the State level. At the State Level there will be a Multisectoral Coordination Structure (MCS) as the steering committee and State Technical Committee (STC). It will be responsible for all administrative & technical implementation and project management activities in the State. It will also facilitate liaison with MDAs, CBOs, NGOs and project affected communities.

**1.3.5 Relevant Institutions**

These are ministries, departments, agencies, civil societies etc that are directly or indirectly involved with the implementation of the NFWP-SU, which will involve multi-sectoral participation. These institutions will aid in broader activities under the project.

## **CHAPTER TWO**

### **STUDY METHODOLOGY**

#### **2.0 Purpose of the ESMF**

The Environmental and Social Management Framework (ESMF) is fundamental when operations involve multiple sub-projects, even though at this stage, the entire range of environmental and social management issues involved are not fully known. Therefore, the ESMF serves as a statement of the policy, principles, institutional arrangements and procedures that the project management will contemplate, for each sub-project, in addressing environmental and social concerns.

This ESMF establishes the environmental and social policy framework, institutional arrangements, and capacity necessary to identify and mitigate potential E&S standards compliance issues and impacts of each subproject. It does not attempt to deal with site-specific impacts.

#### **2.1 Objectives of the Environmental and Social Management Framework**

The major developmental objective of the ESMF is to enable support for effective decision making in order to ensure that implementation processes during the execution of sub-project activities such as; construction, civil and rehabilitation works are environmentally sound, encourage community consultation and participation, enhance social wellbeing and are sustainable. Specifically, this Environmental and Social Management Framework seeks to provide a clear process including action plans to integrate environmental and social considerations into the NFWP-SU.

The specific objectives of the ESMF are to:

- Develop a comprehensive baseline for the project, which would include a review of the biophysical and socioeconomic characteristics of the proposed project area, highlighting the major constraints that need to be taken into account in the course of project implementation
- Provide a structure/strategy for the integration of social and environmental consideration at all stages of the program planning, design, execution and operation of various sub-projects
- Ensure overall positive social and environmental impacts of sub-projects and avoid/minimize and manage any potential adverse impacts.
- Establish clear procedures and methodologies for incorporating environmental and social management requirements including stake holder engagement in the implementation of the project and all sub projects.
- Ensure the program is carried out in accordance with today's sustainable development tenets
- Provide guidelines to appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social concerns of the program and sub-projects.
- Determine the training, capacity building and technical assistance needed to successfully implement the provisions of the ESMF.
- Comply with regulatory and policy requirements (local and international) that are applicable to the program and sub projects.
- To assess the potential environmental and social impacts of the sub-projects (rehabilitation, extensions, livelihood adaption, etc), whether positive or negative, and propose measures and plans to reduce or mitigate adverse environmental impacts and enhance the positive impacts of the project.
- Informing the project preparation team and the Federal/ State MDAs of potential impacts of the anticipated sub-projects and relevant mitigation measures and strategies.
- To identify potential environmental and social policies, legal and institutional framework pertaining to the project.
- To establish clear directives and methodologies for the Environmental and Social Impact Assessment (ESIAs) and Environmental and Social Management Plan (ESMP) as might be needed for specific sub-projects.
- Identify modalities for estimating and budgeting the costs for the implementation of the environmental Management Plan for the projects.
- To ascertain the agencies responsible for the implementation of the project Environmental Management Plans and the projects' Monitoring & Evaluation (M&E).

This ESMF will be used by the NFWP-SU, in combination with the Resettlement Framework (RF) for the project. The RF provides a structure to address possible involuntary physical and economic displacement of the program's sub-project and will be applicable for the NFWP as sub-projects will involve risks of involuntary resettlement.

In seeking to implement the NFWP-SU project, the government of Nigeria intends to take into consideration the relevant state-owned laws, where the project will be executed and as well comply with all national and international environmental requirements in order to meet legal obligations and to ensure a sustainable project. This requires meeting the following objectives:

- ESIA/ESMP to meet Nigeria EIA laws
- ESIA/ESMP to meet World Bank EA guidelines and relevant Bank Environmental & Social Framework standards applicable to the NFWP-SU scale-up.

NFWP-SU FPCU will disclose this ESMF as required by the Nigeria EIA public notice and review procedures as well as the World Banks ESS10 (stakeholder engagement & disclosure standards).

## **2.2 Rationale for the ESMF Study**

The Environment and Social Management Framework (ESMF) has been developed to build upon the NFWP and cover the additional States and activities under the SU by addressing the environmental and social issues that would be associated with the infrastructure development and execution of the work activities under the NFWP-SU.

The rationale for preparing this ESMF has not changed and is as follows:

- The detailed operational activities/civil works of the NFWP-SU project are yet to be carried out.
- The bulk detailed project activities to be financed under the NFWP-SU are yet to be identified.
- The specific sites for each sub-project activities pertaining to NFWP-SU are not known.

This document did not attempt to address impacts related to individual sites in all the NFWP-SU study areas. However, issues on ways of integrating and management of social and environmental aspects of the sub-project components at all stages of the project planning, design, execution and operation of the entire NFWP-SU project were established.

This ESMF will be shared with the various relevant stakeholders in the Sectors involved in the implementation of the sub-projects and should form the principles and procedures that will govern the mitigation of adverse environmental and social impacts that would be associated with the proposed NFWP-SU project activities.

## **2.3 Application of the ESMF**

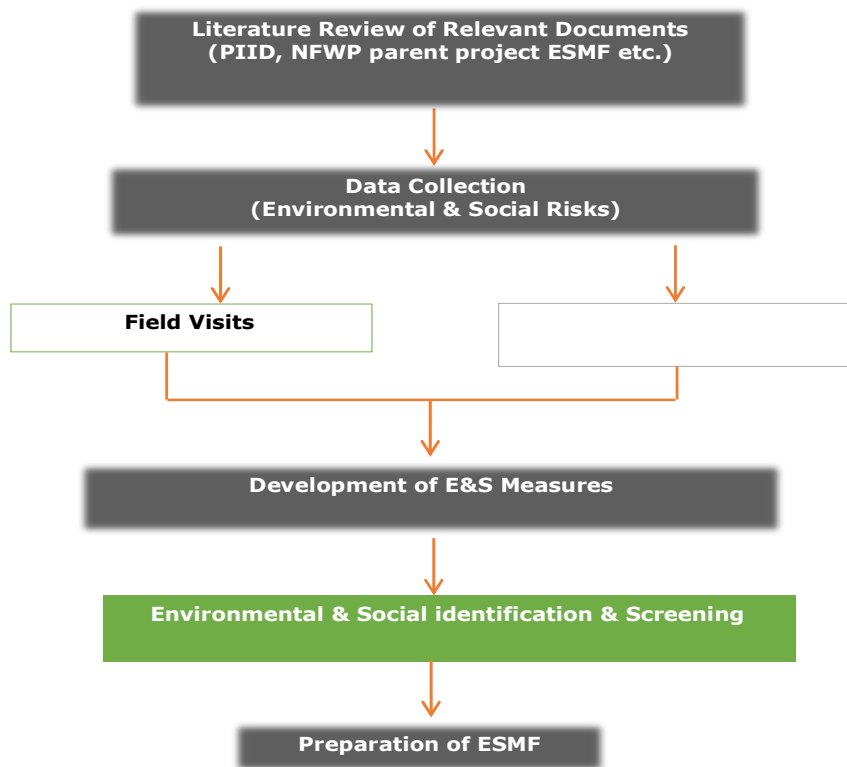
Application of ESMF to the sub-projects enables preparation of a standardized environmental and social assessment documents for appraisal and implementation. For subprojects that will trigger significant environmental/social impacts it will be necessary to undertake the necessary environmental and social assessments, as mandated by the Environmental laws of Nigerian Governments (national and state) and conforming to the Environmental & Social Framework standards of the World Bank. The process for conformance to these procedures is defined in this framework. The criteria established shall enable the identification of such sub-projects.

## **2.4. Technical Approach and Methodology**

This ESMF has been prepared in accordance with standard procedures for environmental assessment including the applicable World Bank Environmental & Social Framework standards and Nigerian environmental assessment guidelines.

### **2.4.1 Study Approach and Methodology**

The ESMF was prepared within a time frame that enabled the consultant's team to accomplish all the tasks as stated in the Terms of Reference (ToR). The indicative work plan, desktop study, scoping activities to understand the projects field of influence, onsite visits, stakeholder mapping and in addition, the review of the existing laws and policies currently in place at each level of government; as well as relevant World Bank policies and processes, constitute activities for successful project output. Figure 1 presents a flowchart of the approach that guided the preparation of this ESMF.



**Figure 1: ESMF Process**

The technical approach was targeted towards obtaining visual information as well as information based on oral interviews and focused group discussions (FGDs). A brief description of activities performed during the implementation process includes;

#### **2.4.1.1 Literature Review**

The methodology adopted for undertaking this ESMF studies involved an intensive approach, which included desk review & collection of all relevant information in order to achieve successful outputs. Information was garnered from the Nigeria for Women Project, Federal Ministry of Women Affairs & Social Development, Federal Ministry of Environment, Federal Ministry of Works & Housing, Ministry of Lands, World Bank, International documents for similar executed projects, etc.

#### **2.4.1.2 Field Visits & Virtual Consultations**

This activity involved:

- Virtual meetings with 20 representatives from States;
- Focused Group Discussions (FGDs) & Key Informant Interviews (KII) with stakeholders;
- Oral interviews, use of questionnaires and focused group discussions.
- Prediction of Potential Impacts;

(The contacts of the representatives for State Ministries of Environment (and implementing agencies) and other stakeholders in the respective States were obtained from the Nigeria for Women project office.

#### **2.4.1.3 Interactive Virtual Discussions**

The main issues discussed at the consultations included:

- ✓ Environmental management at State level
- ✓ Security challenges

- ✓ Gender Based Violence and Sexual Exploitation and Abuse/Sexual Harassment (SH)
- ✓ Environmental issues (land use, waste management practices etc)
- ✓ Pest management measures
- ✓ Involuntary displacement
- ✓ Social barriers to women's access to land

Field/On-site Focused Group Methodologies used:

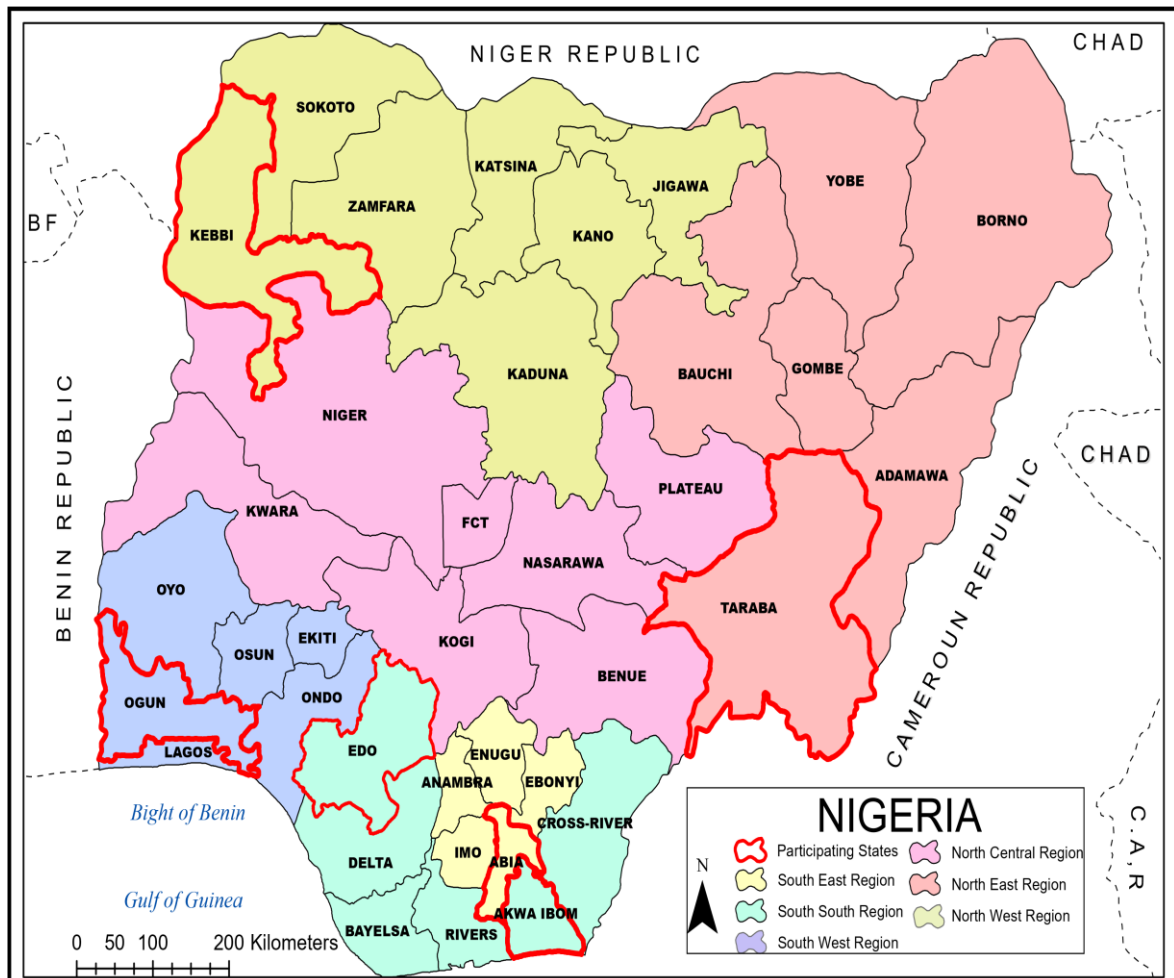
- a) Independent investigation
  - Principal data source (Federal and state ministries, and MDAs concerned Ministry of Works & Housing, Ministry of Environment, Ministry of Lands, State Waste Management Agencies)
- b) Multi-method study or program
  - Qualitative & quantitative methods
  - Triangulation
    - i. Investigator triangulation: This involved the use of multiple researchers in an investigation.
    - ii. Methodological triangulation: This involved using more than one method to gather data, such as interviews, observations, questionnaires, and documents.

## CHAPTER THREE

### BASELINE INFORMATION

#### 3.0 Introduction

Specific subproject locations of the scale-up project are yet to be determined at this stage. However, the project will be implemented in 12 States, these include Ekiti, Cross River, Bayelsa, Lagos, Kogi, Ogun, Sokoto, Anambra, Katsina, Zamfara, Taraba and Delta states in the Six Geopolitical zones in Nigeria, with possibilities of additional 13 states joining the project. The states selected for the study from the participating States are Akwa Ibom, Ogun, Kebbi, Taraba, Niger and Abia States to represent each of the six geopolitical zones. Figure 2 presents a map of Nigeria showing these zones; North East, North Central, North West, South West, South-South and South East geopolitical zones.



**Figure 2: Map of Nigeria Showing different geopolitical zones including a participating State from each zone**

### 3.1 Overview of participating States

This section describes the geophysical, demographic, agricultural and socioeconomic characteristics of the participating states as presented in Tables 1 – 6 for Abia, Kebbi, Ogun, Niger and Taraba States, with each State selected to represent each of the 6-different geopolitical zones of Nigeria.

**Table 1: Baseline information of Abia State**

ABIA STATE	
PROFILE	DESCRIPTION
<b>Geographic Location and Profile</b>	<ul style="list-style-type: none"> <li>Abia State is located in southeast Nigeria with Umuahia as her capital town.</li> <li>It has 17 local government areas.</li> <li>The state was created on the 27th of August 1991.</li> <li>Abia State is bounded on the north and northeast by Anambra, Enugu and Ebonyi States and to the west by Imo State and to her east and southeast by Cross River State and Akwa Ibom State respectively.</li> </ul>
<b>Demography</b>	<ul style="list-style-type: none"> <li>Abia has a population of 2,833,999 (2006 population census) made up of 51.46% males and 48.5% females</li> <li>The state occupies about 5,834 km<sup>2</sup>.</li> <li>According to the 2006 National census, Abia State, has a comparatively high literacy rate of 85.2%.</li> <li>In the National literacy survey of 2010 Abia has the second highest youth literacy (in English) level of 95.6% in Nigeria (National Bureau of Statistics, 2010).</li> <li>The literacy rate is higher for males (60%) than females (40%) and higher in urban areas.</li> </ul>
<b>Physical Environment</b>	<ul style="list-style-type: none"> <li><b>Geology</b> Abia State has a variety of landforms, despite the fact that it is dominated by flat and low-lying land, generally less than 120m above sea level. The low-lying plain is the inland extension of the coastal plain from the Bight of Benin. The central part of the state is characterized by undulating land with many hills. The highland areas are part of the Enugu - Nsukka - Okigwe cuesta. This area has an average height of between 120m and 180m above sea level. On the other hand, the southern part of the state has low lying to moderately high plain topography. General surface elevation ranged between 95 – 130m above sea level. It is drained by Imo River and its tributaries which flow in a southern direction and empties into Atlantic Ocean. The soils of Abia State fall within the broad group of ferrallitic soils of the coastal plain sand and escarpment.</li> <li><b>Rainfall</b> The rainy season begins in March and ends in October with a break in August. The dry season which lasts for four months begins in November. Heavy thunderstorms are characteristic of the onset of the rainy season. The total rainfall decreases from 2200mm in the south to 1900mm in the north. The relative humidity is usually high throughout the year, reaching a maximum during the rainy season when values above ninety per cent are recorded.</li> <li><b>Temperature</b> Temperature values are high throughout the year over the project environment. Mean maximum ambient temperature values range between 32°C in February and 28°C in July and September, while minimum temperatures range between 29°C in March and 27°C in August. A quick overview of the data indicates that higher temperatures were recorded at the peak of the dry season, between November and May, while lower temperatures were recorded in the rainy season, between June and October. It is obvious that the rains appear to have a moderating influence on temperatures.</li> </ul>
<b>Socio-economic Characteristics, Poverty and Livelihoods</b>	<ul style="list-style-type: none"> <li>The major occupation is trading, influenced by the situation of <i>Ariaria</i> International Market in Aba which is a major city in Abia State.</li> <li>Agriculture is the second main economic sector and contributes 27% of the GDP, while providing employment for about 70% of the state workforce</li> <li>Abia State has a poverty headcount rate of 30.7 percent and a Poverty Gap Index (PGI) of 7.15 (NBS, 2020).</li> </ul>
<b>Agriculture</b>	<ul style="list-style-type: none"> <li>Agriculture is the major occupation of the people and about 70% of the</li> </ul>

	<p>population is engaged in it. Subsistence farming is prevalent and farming is determined mainly by the seasonal distribution of rainfall.</p> <ul style="list-style-type: none"> <li>• The main food crops grown are: <ul style="list-style-type: none"> <li>❖ yam, cassava, rice, cocoyam and maize,</li> <li>❖ while the cash crops include oil-palm, rubber, cocoa, banana and various types of fruits.</li> <li>❖ Modern poultry has been introduced and is practised by a good number of people.</li> </ul> </li> </ul>
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**Table 2: Baseline information of Kebbi State**

<b>KEBBI STATE</b>	
<b>PROFILE</b>	<b>DESCRIPTION</b>
<b>Geographic Location and Profile</b>	<ul style="list-style-type: none"> <li>• Kebbi state was created on the 27th of August 1991 from Sokoto state.</li> <li>• It is bordered by Sokoto State to the North and East, Niger State to the South, Dosso Region in the Republic of Niger to the North-west and the Republic of Benin to the West.</li> <li>• The state capital is Birnin Kebbi, and it has 21 LGAs.</li> <li>• It has a total area of 36,229 sq. km<sup>2</sup> (10th largest in Nigeria).</li> </ul>
<b>Demography</b>	<ul style="list-style-type: none"> <li>• Kebbi State is mainly populated by Hausa people with some members of Bussawa, Dukawa, Kambari and Kamuku, ethnic communities. The religions in Kebbi are Christianity and Islam.</li> <li>• The estimated population of the state as at 2006 was 3, 238, 628.</li> <li>• The literacy level as at 2010 was estimated at 25.3% (15.56% male and 9.71% female).</li> </ul>
<b>Physical Environment</b>	<ul style="list-style-type: none"> <li>• <b>Geology</b> The southern part of Kebbi state is rocky and the northern part is sandy. The State has two important agricultural lands namely – the FADAMA land and dryland. The FADAMA is an agricultural land, which seasonally flooded with water during the period of rains and recede during the dry season leaving a coating of alluvial clay soil. The dryland areas of the State shared similar characteristics with other dry areas of the world. They were characterized as slowly permeable, most of the water is lost by run-off and might have been formed under aridity from wind-stored desert sands that accumulated over long periods of time.</li> <li>• <b>Temperature and Rainfall</b> The average maximum temperature ranges between 300°C and 410°C, while the average minimum ranges between 150°C and 260°C. Average rainfall is 740mm annually, and spreads over a rainy season of about 120 days.</li> <li>• <b>Hydrology and Water Resources</b> Kebbi state is endowed with economically viable rivers such as the Niger and the Rima for the development of fisheries activities.</li> <li>• <b>Vegetation</b> The state has Sudan and Sahel Savannah vegetation</li> </ul>
<b>Socio-economic Characteristics Poverty and income Livelihoods</b>	<ul style="list-style-type: none"> <li>• A large percentage of the people are farmers.</li> <li>• Fishing has always been one of the key occupations of the inhabitants of the state</li> <li>• The state has substantial deposits of gypsum, marble, kaolin.</li> <li>• Kebbi has a poverty headcount rate of 50.17 percent and a Poverty Gap Index (PGI) of 15.14. (NBS, 2020).</li> </ul>
<b>Agriculture</b>	<ul style="list-style-type: none"> <li>• The major agriculture produce in the state are rice, wheat, millet, guinea corn, sorghum, maize, soyabeans, cowpea, pepper, and economic trees including sheabutter, mango, cashew.</li> <li>• Kebbi state is also a big exporter of livestock (cows, goats, rams) to the south (Lagos, Port-harcourt and Abeokuta)</li> <li>• There are some processing mills in the state including <ul style="list-style-type: none"> <li>✓ Wacot Rice Mill</li> <li>✓ Labana rice mill</li> <li>✓ Cassava processing mill in Jega</li> <li>✓ Groundnut processing mill in Karaye and Maima</li> </ul> </li> <li>• About 40% of women in the rural areas participate in farming (cultivation, livestock) and agricultural processing.</li> </ul>



**Table 3: Baseline information of Ogun State**

<b>OGUN STATE</b>	
<b>PROFILE</b>	<b>DESCRIPTION</b>
<b>Geographic Location and Profile</b>	<ul style="list-style-type: none"> <li>• Ogun state was created on the 3<sup>rd</sup> of February 1976 from the old western region. Its capital is Abeokuta.</li> <li>• It shares a continuous boarder with Lagos state to the south, Oyo state and Osun state to the North, Ondo state to the East and Republic of Benin to the west. It its nicknamed the gateway state due to the continuous boarder it shares with the Republic of Benin.</li> <li>• Ogun State is situated at latitude 6.2<sup>o</sup>N &amp; longitude 3.0<sup>o</sup>E 85.0<sup>o</sup>E</li> <li>• It has 20 local government areas.</li> <li>• Ogun state occupies and area extent of 16980.55km<sup>2</sup></li> </ul>
<b>Demography</b>	<ul style="list-style-type: none"> <li>• English is the official language of the state. The major tribal language of the Ogun people is Yoruba but there are four main dialects to take care of the four ethnic majority groups.</li> <li>• Ogun state has four major ethnic groups which includes the Egba who are located in Abeokuta, the Egbado who are also located at the capital Abeokuta, the Ijebus who are majorly found at Ijebu-ode, Ijebu-Igbo and other Ijebu town and lastly but north the least are the Remo people who are located at Sagamu. There are also minorities groups found in Ogun state which includes the Egun people, the Ilaje, the Ikale and Dahomey who migrated into the area from Republic of Benin.</li> <li>• Christianity and Traditional Religion are the majorly practiced religions in the State.</li> <li>• Ogun State has a population of 3751,140 people as at the last population census 2006 in Nigeria with population density of 220/km<sup>3</sup> that is 220 persons per square kilometers.</li> <li>• The literacy level as at 2010 was estimated at 72.1% male and 60.3% female.</li> </ul>
<b>Physical Environment</b>	<ul style="list-style-type: none"> <li>• <b>Geology</b> Ogun state has a unique geology. There are two main type of rock form in the state; the geology is made up of basement complex rock of the Precambrian age which is made up of older and younger granite. At the southern part of the state on the other hand there are younger and older sedimentary rocks of both the tertiary and secondary ages.</li> <li>• <b>Relief</b> Ogun state can be said to have an undulating relief form i.e. the state has an undulating lowland with numerous hills scattered about the state which are interfluves between the different river valleys within the state with some being remnants of large planation of inselbergs found in the state capital Abeokuta such as the Olumo rock.</li> <li>• <b>Drainage</b> The state is drained by many rivers such as the rivers Ogun, Oyan, Osun, Yewa, Yemoji, Ona, Sosa, Oru, Oha, Iju Abifon etc. Due to the location of the state most of these rivers are either tributaries or empty into the coastal lagoons or into the Atlantic Ocean.</li> <li>• <b>Climate</b> Ogun state is located in the hot humid tropical climate zone of Nigeria. It has two distinct seasons which are wet or rainy season and dry season. The rain seasons last from March or April to November while the dry season last from November to March or April. The mean annual rainfall of the state varies from 128com in the southern part of the state to 105cm in the Northern. Temperature also varies with season with the highest temperature at the dry season and the lowest at the rainy season. The average monthly temperature ranges from 28<sup>o</sup>C in the rainy season and the dry season has the highest of 35<sup>o</sup>C.</li> <li>• <b>Soil and Vegetation</b> The soil and vegetation of Ogun state varies from one location to the other and this has to do with the fact that Ogun state is bounded by different vegetation belt on its west, south, east and North. At one part there is a mangrove forest vegetation while on the other there is a rain forest vegetation and other part show</li> </ul>

	a guinea savannah vegetation. The soil type is determined by the parent material and type of vegetation found in each region.
<b>Socio-economic Characteristics Poverty and income Livelihoods</b>	<ul style="list-style-type: none"> <li>• Ogun State has lots of tourist centers. They include: Olumo rock located at Ikija in Abeokuta, the Ogun state Hall of Fame, Bilikisu Osungbo shrine in Ijebu-Ode, Osuuru Spring at Imeko to name but a few.</li> <li>• The economy of the State is agro-based, with large expanse of arable land. Farming is the dominant economic activity for both the males and females who are involved in food crop production and in trading which is the second most important source of income.</li> <li>• Ogun has a poverty headcount rate of 9.32 and a Poverty Gap Index (PGI) of 1.63. (NBS, 2020).</li> </ul>
<b>Agriculture</b>	<ul style="list-style-type: none"> <li>• Majority of the women in the rural areas participate in farming (cultivation, livestock) and agricultural processing.</li> <li>• The major agriculture produce in the state are cassava, yam, potato and cocoyam. Cotton grown in the village supplies the Yaru tread and textile Industries in Benin republic. Other crops include pepper, maize, groundnut, yam, vegetables, cocoa, cashew etc.</li> <li>• Livestock rearing such as poultry, goats and sheep.</li> </ul>

**Table 4: Baseline information of Niger State**

<b>NIGER STATE</b>	
<b>PROFILE</b>	<b>DESCRIPTION</b>
<b>Geographic Location and Profile</b>	<ul style="list-style-type: none"> <li>• Niger State was created from the defunct North- Western State of Nigeria on 3rd February 1976 and is located in North Central Nigeria.</li> <li>• The state capital is Minna, and other major towns are Bida, Kontagora, and Suleja.</li> <li>• The State lies on latitude 8° to 11°:30' North and Longitude 03° 30' to 07° 40' East.</li> <li>• The state is bordered to the North by Sokoto State, to the west by Kebbi State, South by Kogi, South-West by Kwara State. Kaduna State and the Federal Capital Territory border the State to both the North-East and South-East respectively. Also, Niger State shares an international boundary with the Republic of Benin along New Busa, Agwara and Wushishi Local Government Areas.</li> <li>• The State has 25 local government areas.</li> </ul>
<b>Demography</b>	<ul style="list-style-type: none"> <li>• Niger State covers a total land area of 83,266,779 square kilometres or about 8.3 million hectares which represents about 8% - 10% of the total land area of Nigeria. This makes it the largest landmark state in the country. About 85% of the land is arable.</li> <li>• There are three major ethnic groups (Nupe, Gbagyi, and Hausa) in the State, other tribal groups include - Kadara, Koro, Baraba, Kakanda, Ganagana, Dibo, Kambari, Kamuku, Pangu, Dukkawa, Gwada and Ingwai.</li> <li>• Christianity and Traditional Religion are the majorly practiced religions in the State.</li> <li>• Niger State has a population of 3,950,249 people based on the last population census 2006 in Nigeria; 2,032,725 males and 1,917,524 females</li> </ul>
<b>Physical Environment</b>	<ul style="list-style-type: none"> <li>• <b>Geology</b> Niger State is covered by two major rock formations: The sedimentary and the basement complex rocks. The sedimentary rocks to the south are characterized by sandstones and alluvial deposits, particularly along the Niger valley and in most parts of Borgu, Bida, Agaie, Lapai, Mokwa, Lavun, Gbako and Wushishi LGAs. To the north is the basement complex, characterized by granitic outcrops or inselbergs which can be found in the vast topography of a rolling landscape. Such inselbergs dominate the landscape in Rati, Shiroro, Minna, Mariga and Gurara.</li> <li>• <b>Soil</b> Like most alluvial soils, the soil in Niger State is the flood plain type and is characterized by considerable variations. The soil is of two main types which could be used for agriculture and are rich in minerals for the manufacture of various products. The two types of soils are: a) The Ku-soil which has little hazards</li> </ul>

	<p>b) The Ya-soil which has a better water holding capacity.</p> <ul style="list-style-type: none"> <li>• <b>Drainage</b> The state is drained by kaduna, Gurara, Niger and Wushishi Dam.</li> <li>• <b>Climate</b> Niger State experiences distinct dry and wet seasons with annual rainfall varying from 1,100mm in the northern parts to 1,600mm in the southern parts. The mean annual temperature increases northward from about 30oC to 37oC. The maximum temperature is recorded between March and June, while the minimum is usually between December and January. The rainy season lasts for about 150 days in the northern parts to about 120 days in the southern parts of the State. Rainfall intensity ranges from 60mm/hr to 105mm/hr.</li> <li>• <b>Vegetation</b> The vegetation is characterized by woodlands and tall grasses interspersed with tall dense floral species. However, within the Niger trough and flood plains, there are taller trees and a few oil palm trees. In some areas, traces of rain forest species can be seen.</li> </ul>
<b>Socio-economic Characteristics Poverty and income Livelihoods</b>	<ul style="list-style-type: none"> <li>• The economy of the State is agro-based, with large expanse of arable land. Farming is the dominant economic activity for both the males and females who are involved in food crop production and in trading which is the second most important source of income.</li> <li>• Women agricultural cooperatives exists (Ayenuje, Zomolo women Cooperatives).</li> <li>• Women engage in dry season farming by digging out water from the dry riverbeds</li> <li>• Niger has a poverty headcount rate 66.11 percent and a Poverty Gap Index (PGI) of 21.68. (NBS, 2020).</li> </ul>
<b>Agriculture</b>	<ul style="list-style-type: none"> <li>• Niger state is one of the highly agricultural states in the federation.</li> <li>• Niger State women are actively involved in agricultural activities at every stage.</li> <li>• The major agriculture produce in the state are yams, rice, maize, soya beans, sesame (benniseed), cassava, sorghum as well as melon, beans, shea-butter and cowpeas.</li> <li>• Livestock rearing such as fish, cattle, goats and sheep.</li> </ul>

**Table 5: Baseline information of Akwa Ibom State**

<b>Akwa Ibom State</b>
<b>DESCRIPTION OF PROJECT AREA</b>
<b>Geographic Location and Profile</b>
<ul style="list-style-type: none"> <li>• Akwa Ibom state is a state in the coastal southern part of Nigeria. It was founded September 23 1987 out of cross river state (Ndaeyo <i>et al.</i>, 2001).</li> <li>• Its capital is Uyo; and is bounded East by cross river state, west by River state and Abia, south by Atlantic Ocean in the south.</li> <li>• Akwa ibom is geographically defined by latitudes 4o 32" to 5o 33" north of the Equator and longitudes 7o 25'to 8o 25"east of the Greenwich meridian (Ekpenyong <i>et al.</i>, 2001; Umeh <i>et al.</i>, 2018) Area coverage of the State is 6,900 square kilometers.</li> <li>• It has 31 local government areas. (Etim <i>et al.</i>, 2019) It has a total area of 7,081 km<sup>2</sup></li> </ul>
<b>Demography</b>
<ul style="list-style-type: none"> <li>• English is the official language of the state.</li> <li>• The major tribal languages spoken in the state are Anaang, Ibibio, igbo, the others are minority Itu, uyo, Etinan, Ikot, Ikono, Ekpe-Atai, Uruan, Onna, Nsit-Ubium and Mkpato Enin.</li> <li>• Some of the ethnic groups in the State are Ibibio, Anaang, Oron, Eket, Obolo.</li> <li>• Akwa ibom State is a predominantly a Christianity.</li> <li>• The population based on 2006 National population census, is 3,178,950 which consisted of 1,983,202 males and 1,195,748 females.</li> </ul> <p>The literacy level as at 2010 was estimated at 82.14% male and 65.46% female (National Literacy Survey, 2010)</p>

<b>PHYSICAL ENVIRONMENT</b>	
<ul style="list-style-type: none"> <li> <b>Climate</b>                      Based on the geographical location of the state, the climate of the state can be described as tropical with high temperature. The state experiences two main distinct seasons: The wet or rainy season which is prolonged for eight to nine months starting from mid- march till the end of November and the dry season with a short duration in comparison to the wet season with a duration that lasts between the last week of November or early December till early march. However, in the coastal areas, the rain falls almost all year round. The harmattan which is accompanied by the North-East wind begins in December and early January.                 </li> <li> <b>Rainfall</b>                      There is significant rainfall in Akwa Ibom and is expected every month of the year due to its location along the coast. The annual rainfall ranges from 2000mm to 3000 mm, depending on the area which allows for favourable cultivation of agricultural and forest products (Etim <i>et al.</i>, 2019). The northern part of the state tends to show some frightful increase in annual rainfall but ultimately, there is a decline in the annual rainfall of the state.                 </li> <li> <b>Humidity</b>                      The location of Akwa Ibom in the north of the Equator and within the humid tropics gives it its proximity to the sea and makes the state generally humid. A maximum humidity is usually expected in July while the minimum occurs in January.                 </li> </ul>	
<b>Land Tenure</b>	
<b>Socioeconomics</b>	
Akwa Ibom has a poverty headcount rate of 26.82 percent and a Poverty Gap Index (PGI) of 7.25. (NBS, 2020).	
Parcels of land continue to pass from members to other members of the same family. Land holding can only get to another family when it is sold "outright" and this type of sale must be agreed upon by other members of the family. It is worthy to note that land holdings continue to pass through generations the same family and within the community. By and large, two main land tenure systems are discernible in Akwa Ibom State and is also applicable to other parts of the country. They include Statutory and Customary land tenure systems. Under statutory land tenure, both occupied and unoccupied lands are brought under the control and subject to the disposition of the government (land Use Act, 1978). With the customary land tenure, land is owned and held by families, communities, and lineage groups.	

**Table 6: Baseline information of Taraba State**

<b>TARABA STATE</b>	
<b>PROFILE</b>	<b>DESCRIPTION</b>
<b>Geographic Location and Profile</b>	Taraba is a state in North Eastern Nigeria, named after the Taraba River, which traverses the southern part of the state. Taraba consists of sixteen (16) Local Government Areas (or LGAs) state's capital is Jalingo. Taraba state is bounded in the west by Nasarawa state and Benue state, northwest by Plateau state, north by Bauchi state and Gombe state, northeast by Adamawa state, and south by Northwest Region in Cameroon. The inhabitants are mainly the people from Mumuye, Fulani, Jenjo, Wurkum, and Kona tribes, who are predominantly resident in the northern part of the state, while the Jukun, Chamba, Tiv, Kuteb and Ichen tribes are found predominantly in the southern part of the state. The central region is mainly occupied by the Mambila people, Chamba, Fulani and Jibawa
<b>Demography</b>	The dominant ethnic groups in the area include Bandawa, Karinjo, Gomo, Jenjo, Jukun and Fulani. The climatic condition is tropical with cold breeze coming from River Benue.
<b>Physical Environment</b>	<p><b>Temperature</b></p> <p>The climate of Taraba state is marked by an annual average temperature of 33°C but high level of cold in January and an increased rainfall in August. The percentage of rainfall in Taraba state is 40.35% with 54.98% relative humidity. The state is usually very warm in March with 40.44°C, and an average wind of 8.84kmh/5.94mph. however, the Mambila plateau with an altitude of 1800m above sea level has a temperate climate.</p> <p><b>Rainfall</b></p> <p>Taraba state has a tropical wet and dry climate. Dry season lasts for a minimum of five months (November to March) while the wet season spans from April to October. Mean annual rainfall ranges from 800mm in the northern part of the state</p>

	<p>to over 2000mm in the southern part. This is corroborated by past studies have also revealed that the distribution is mostly influenced by altitudes and latitudes, since high altitude areas such as Mambilla Mountains and the lower latitudes of southern parts of the State receive more rainfall than the plains and the higher latitudes of the northern parts respectively.</p> <p><b>Drainage</b> The soil type is clayey, which holds water during the raining season but no over flooding of the area due to its elevated nature. Studies<sup>11</sup> of the drainage pattern in Taraba State show that the drainage network in Taraba State is dendritic. The <u>Benue</u>, <u>Donga</u>, Taraba and <u>Ibi</u> are the main rivers in the state. They rise from the <u>Cameroonian</u> mountains, straining almost the entire length of the state in the North and South directions to link up with the <u>River Niger</u>. Value of drainage density indicates moderate runoff potentials. This depicts geological structures which do not distort the drainage pattern, while the drainage basins indicate low flooding susceptibility. The elongated the basin length, the little the effect on the extent to which the surface runoff manipulate the basin and been lowered by agents of denudation. Catchment characterizations of the study area and basin morphometry do not typify high flooding susceptibility. Environmental degradation through proliferation of haphazard and uncontrolled development within and around the flood plain seems the cause of incessant flooding in the catchments</p> <p><b>Climate</b> The Climatic conditions over the project area is determined by the interaction of the warm moist Tropical Maritime air mass and the hot and dry Tropical Continental air mass. The two air masses converge along the Inter-Tropical Convergence Zone (ITCZ), which moves in response to the seasonal disposition of the overhead sun</p> <p><b>Vegetation</b> The vegetation in the project area is typical of guinea savannah, vegetation with the guinea savannah or grassland to the northern part of the State and a vegetation of low forest in the southern part which is marked mainly by forests and tall grasses. In fact, an isolated population of the red sunbird bush was discovered in the Leinde Fadale forest in the uplands adjacent to the Gashaka Gumti Park in 2002. However, the natural vegetation is being altered by human activities in and around these areas through activities such as tree felling, urbanization and bush burning.</p> <p><b>Wildlife</b> Taraba is home to the Gashaka Gumti National Park which in 1991 was gazette from two game reserves and is located in to the east of the State with around 103 species of mammals some of which are yellow backed duiker, African golden cat (<i>Profelis aurata</i>), the Africa buffalo, chimpanzees, elephants (<i>Loxodonta africana</i>), west African dogs (<i>Lycaon pictus manguensis</i>), giant eland (<i>Taurotragus Debrianus</i>). Several avian fauna are also found in the project area and the red faced lovebird is only found in Taraba.</p>
<p><b>Socio-economic Characteristics Poverty and income Livelihoods</b></p>	<p>Taraba has a poverty headcount rate of 87.72 percent and a Poverty Gap Index of 42.38. (NBS, 2020).</p>
<p><b>Agriculture</b></p>	<p>Agricultural activities are mostly farming in food crops such as rice, maize, cassava, guinea corn, millet, fishing and rearing of goats and cattle. The area is dotted with tall trees with short grasses, yam, vegetables, cocoa, cashew etc.</p>

<sup>11</sup> Adelalu T.G., Mohammed B.Y., Benjamin E. B., Yakubu G. C., 2020. Morphometric Analysis and Flash Floods Assessment of River Taraba Basin in Taraba State. European Scientific Journal July 2020 edition Vol.16, No.20 ISSN: 1857-7881 (Print) e - ISSN 1857-7431.

### 3.2 Physical Environment

#### 3.2.1 Ambient Noise Levels

Sound is periodic fluctuation of air pressure, while noise is “unwanted sound”. FMEEnv standard noise levels are presented in Table 7. The noise levels in participating States are generally higher in the urban areas than other parts of the State due to the use of machines, generators and other equipment, but these levels still remain within permissible limits.

**Table 7:** Nigeria’s Standard Noise Levels

Description	Maximum Permissible Noise Limit (dBA)	
	Day (6am – 10pm)	Night (10pm – 6:00am)
Any building such as hospital, convalescence home of the aged, sanatorium, institutes of learning, library, environmental or recreational sites.	45	35
Residential buildings	50	35
Mixed residential (with some commercial or entertainment)	55	45
Residential + industry or small-scale production + commerce	60	50
Industrial (outside perimeter fence)	70	60

Source: NESREA regulations on noise standards and control, 2009

#### 3.2.2 Ambient Air Quality

The Federal Ministry of Environment (FMEEnv) adopted the WHO standards (Table 8) as the national standards for gaseous emissions against which air quality parameters monitored are compared in order to ascertain its “cleanliness”.

**Table 8:** Nigerian Ambient Air Quality Standard

Air Pollutants	Emission Limits
Particulates	250 (µg/m <sup>3</sup> )
SO <sub>2</sub>	0.1 (ppm)
Non-methane Hydrocarbon	160 (µg/m <sup>3</sup> )
CO	11-4 (µg/m <sup>3</sup> ) or 10 (ppm)
NOX	0.04-0.06 (ppm)
Photochemical Oxidant	0.06 (ppm)

Source: FME 1991

**Table 9:** Air Quality Classification Based on Total Suspended Particles (TSP) Values

Range of TSP Values (µg/m <sup>3</sup> )	Class of Air Quality
0 – 75	High Quality
76 – 230	Moderate Quality
231 – 600	Poor Quality

Source: Jain, et. al (1976)

### 3.3 Social Environment

According to the World Bank’s Poverty & Shared Prosperity report (2022), women in Nigeria have the most limited economic opportunities during their reproductive years, when they bear the greatest burden of childcare and domestic responsibilities. In accordance with social norms, many married women depend on their husbands as breadwinners. Those who find themselves suddenly heads of their households, with limited economic resources or assets, are at risk of falling below the poverty line. Prioritizing a structured institution and mechanisms to provide social, economic, and financial insurance to women and women-led

enterprises and households is key to building resilient women's economic empowerment in Nigeria<sup>12</sup>.

### 3.3.1 Population

The combined population of the participating States considered for this study was 24,689,343 in 2014 and this increased by 5.9 percent to 26,243,869. Growth rate for the states was between 2.7 – 3.4 as shown in data presented in Table 11. Also, the sex ratio was 102 men per 100 women. In line with current trend, total fertility rate (TFR), remained the same at 5.5 births per woman, that is, 5,500 births per 1000 women while the total number of internal migrants remained as estimated at 11,257 (NPopC, 2010). Population statistics of the six States that have been selected to represent each of the geo-political zones of Nigeria is presented in Table 10.

**Table 10: Projected population by State**

Name of State	projected population		Growth rate <sup>13</sup>
	2014	2016	
<b>Abia</b>	3,531,408	3,727,427	2.70
<b>Akwa Ibom</b>	5,121,781	5,482,177	3.40
<b>Ogun</b>	4,884,856	5,217,716	3.30
<b>Kebbi</b>	4,173,127	4,440,050	3.10
<b>Taraba</b>	2,894,018	3,066,834	2.90
<b>Niger</b>	5,190,982	5,556,247	3.40

Demographic population statistics bulletin, 2017 (NBS)

### 3.3.2 Literacy levels

Comparing the data for the literacy levels in the participating States (Table 11) reveals that Abia, Akwa Ibom and Ogun States both have high literacy in English & any other Language, while Taraba State have slightly above average literacy levels. On the other hand, Kebbi and Niger States show below average literacy in English language and average literacy in any other language, which have further worsened with time due to the banditry & insurgency in the North-West zone, from the restriction of access to educational services. This would mean that these literacy outcomes will need to be considered for sensitization programmes related to consultations on environmental & social issues in the project area.

**Table 11: Literacy Levels in Nigeria**

State	Literacy in English	Literacy in any Language	State	Literacy in English	Literacy in any Language
<b>Abia</b>	<b>76.2</b>	<b>81.3</b>	Katsina	27.5	53.3
Adamawa	58.4	73.3	<b>Kebbi</b>	<b>29.1</b>	<b>57.2</b>
<b>Akwa Ibom</b>	<b>75.1</b>	<b>79.6</b>	Kogi	67.7	72.5
Anambra	72.8	74.0	Kwara	36.1	42.6
Bauchi	26.6	65.7	Lagos	80.5	87.7
Bayelsa	77.3	77.7	Nasarawa	47.5	54.1
Benue	69.8	73.3	<b>Niger</b>	<b>42.6</b>	<b>50.1</b>
Borno	38.1	58.6	<b>Ogun</b>	<b>66.2</b>	<b>77.7</b>
Cross River	76.6	77.1	Ondo	58.9	74.3
Delta	69.5	71.3	Osun	62.6	70.0
Ebonyi	69.8	70.0	Oyo	59.3	71.3
Edo	63.5	64.0	Plateau	75.2	65.0
Ekiti	62.9	72.2	Rivers	75.2	81.9
Enugu	64.6	65.0	Sokoto	22.1	77.4
Gombe	34.5	63.9	<b>Taraba</b>	<b>56.9</b>	<b>62.7</b>

<sup>12</sup> Project Information Document (PID) 002. Ref No.10. Page 5

<sup>13</sup> Demographic & Health Survey, 2018 (NBS), Table A.1 population distribution. Appendix. A, Page 490.

State	Literacy in English	Literacy in any Language	State	Literacy in English	Literacy in any Language
Imo	80.8	82.4	Yobe	24.2	48.9
Jigawa	26.1	74.1	Zamfara	26.2	82.5
Kaduna	53.5	72.4	FCT	58.1	61.0
Kano	27.8	74.1			

Source: National Literacy Survey, 2010 (NBS)

### 3.3.3 Socioeconomics

Conflict is a common phenomenon in all organizations where two or more persons come together to achieve certain objectives set by organizations. It has been observed that the incessant bombings and gun attacks in the Northern parts of this country by the Boko Haram fundamentalists, have seriously affected the economic lives of individuals in participating States.

### 3.3.4 Education

Education is one of the most important aspects of social and economic development. Education improves capabilities and is strongly associated with various socioeconomic variables such as lifestyle, income, and fertility for both individuals and societies. In Nigeria, at zonal level, the North West and North East have the highest percentages of both females (55% and 57%, respectively) and males (40% and 47%, respectively) with no education, while Net Attendance Ratio (NAR) is lowest in the North East at 46% in urban areas and 31% in the rural areas.

The proportion of the girl-child enrolled in primary school increased from 45.7 percent in 2010 to 48.6 percent in 2015. Completion rate for girls in primary and secondary schools increased from 46.7 percent and 47.1 percent in 2010 to 48.3 percent and 47.9 percent respectively in 2015. Secondary schools' enrolment for boys and girls is on the increase. The proportion of girls enrolled in secondary school increased slightly from 45.3 percent in 2010 to 45.7 percent in 2015. However, enrolment into tertiary institutions across the country appeared male dominated on the average. At the primary level of education, women teachers constituted the highest proportion decreasing at higher levels of education. Women constitute about 25 percent of teaching staff at the tertiary level of education. Similarly, the gender school enrolment gap still persists in most states of the north. For example, in 2015, secondary school enrolment ratio for girls was 56.1% in Abia, 28.5% in Kebbi, 37.3% in Niger, 50.1% in Ogun and 43.2% in Taraba (NBS, 2016).

### 3.3.5 Social Capital

The social capital of the project area is characterised by the following:

#### 3.3.5.1 Health

The national *life expectancy* for women was 56 years and for men 53 years (NBS, 2013). Overall, women appear to live longer than men in all the states. However, among reported cases of diseases, *HIV/AIDS* affected females most. On the average, the disease accounted for 58.6 percent of female deaths and 41.4 percent of male deaths in the period 2010-2015 (NBS, 2013). *Malaria* was the second leading disease for both men and women infecting, on the average, 54.8 percent females and 45.2 percent males within the same period.

#### 3.3.5.2 Employment

The national labour force participation rate of women and men based on the 2015 statistical report in the ages 15-64 years was 74.7 percent. The proportion of men was 82.6 percent while women accounted for 78.4 percent. For the period, 2010-2015, on the average, 72.3 percent of senior positions in State Civil Service were occupied by men compared to 27.7 percent occupied by women.

### 3.3.6 Gender Based Violence

From a human rights, health and economic perspective, domestic violence is of great concern to communities all over the world and to indicate how important it is in our society, Nigeria passed the Violence Against Persons Prohibition Act in 2015, the purpose of which is to eliminate all forms of violence both among the private families that form our societies and



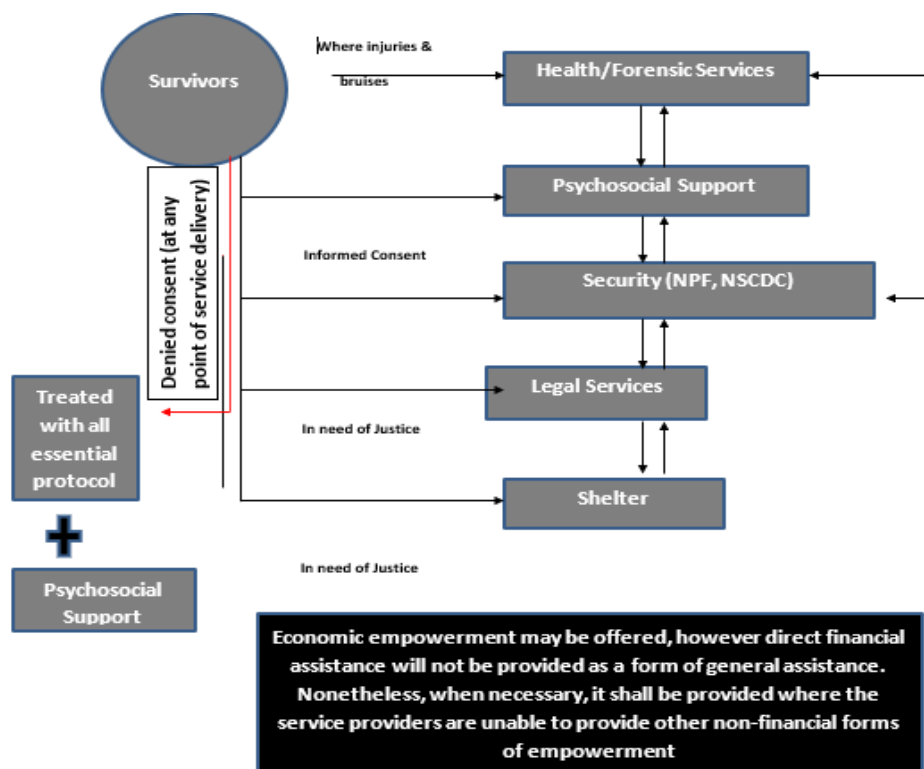
the public sector, where much of the Nigerian population offer their service. The VAPP, coupled with the country being a signatory to the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) are in place to protect women and vulnerable populations in and around the country, against violence with the right to assistance for victims of violence through the Federal Ministry of Women Affairs and Social Development 2015.

By pattern, the DHS 2018 further reported that:

- The percentage of women who have experienced violence during pregnancy is highest in the North East (12%) and lowest in the North West (1%), while the prevalence of sexual violence ranges from 5% each in the North West and South West to 16% in the North East. Also, women in the North East, among the other geo-political zones of the country, are most likely to report that their husband displays three or more of the specified behaviour (28%).
- Women with more than a secondary education (13%) are less likely than women in the other education groups (18% each) to report that their husband displays three or more of the specified behaviours. The percentage of women whose husbands display at least three of the specified behaviours generally declines with increasing wealth, from 21% among women in the lowest wealth quintile to 14% among those in the highest wealth quintile.

### 3.3.6.1 Gender Based Violence (GBV) Complaints

For the NFWP-SU, all GBV complaints will be handled differently from the other categories of complaints due to the sensitivity and possibility for stigma or further harm to a survivor. GBV complaints including SEA/SH the survivor should receive a referral to service providers immediately. The services that shall be offered to survivors include health/forensic services, psychosocial support services, security follow-up services, legal services & provision of shelter. These services are as presented in Figure 3.



**Figure 3: Services offered to GBV survivors**

### 3.3.7 Water Resources

The States that enjoy the highest improved sources of water among the participating are Abia and Ogun States, while others such as Kebbi, Taraba and Niger states have the highest unimproved drinking water sources at around half of the water sources that are inadequate

(between 39.0 - 55.0 percent). The data from the States that have been selected to represent each of the geo-political zones of Nigeria is presented in Table 12.

**Table 12: Drinking water by State**

Name of State	Improved sources of drinking water	Unimproved sources of drinking water
<b>Abia</b>	89.5	10.5
<b>Akwa Ibom</b>	77.3	22.7
<b>Ogun</b>	74.0	26.0
<b>Kebbi</b>	48.7	51.3
<b>Taraba</b>	44.6	55.4
<b>Niger</b>	61.0	39.0

NBS Demographic & Health Survey, 2018.

### **3.3.8 Sanitation**

56% of Nigerian households use improved toilet facilities, 74% in urban areas and 39% in rural areas (Demographic & Health Survey, 2018). A pit latrine with a slab is the most common type of improved sanitation facility in Nigeria, used by 23% of households (24% in urban areas and 23% in rural areas). This is followed by flush/pour flush toilets that flush to a septic tank (16%); 27% of households in urban areas use this type of facility, as compared with only 6% of households in rural areas. Among rural households, 28% use unimproved toilet facilities, most commonly pit latrines without slabs (27%). In addition, open defecation is still widespread in Nigeria, with 25% of households (33% of rural households and 15% of urban households) engaging in this practice.

### **3.3.9 Land Tenure**

Generally, traditional land tenure is based on customary laws under which land was considered community property. An individual had usufructuary rights to the land he farmed in his lineage or community area. He could possess the land as long as he used it for the benefit of his family or society and he could pass the land on to heirs and pledge its use to satisfy a debt but could not sell or mortgage it.

In the Northern part of the country, agriculture is the mainstay of the economy in the area due to the soil fertility, which is suitable for guinea corn and beans production. Men and women engage in rain fed subsistence and commercial farming to meet their staple food needs and for commercial purposes. They supply markets within and outside their states with their farm products own. In this part of the country, women inheritance of land is permitted but participation in agriculture and marketing is restricted or bared by culture and/or determined by the permission of their husbands. In addition to farming, family members rear animals, particularly cattle, camels and small ruminants, while women engage in petty trading such as groundnut oil extraction, sewing and local food and beverages production as means of livelihood. However, most cultures in the southern Nigeria are biased against inheritance of land by women. There is also the nefarious norm in some cultures in which relations of late husband's hijack land and assets from the widows and render them landless.

## **CHAPTER FOUR**

### **DESCRIPTION OF NATIONAL AND INTERNATIONAL REGULATORY FRAMEWORK**

#### **4.0 Introduction**

A number of national and international environmental guidelines are applicable to the operation of the NFWP-SU. In Nigeria, the power to enforce all activities that might impact the environment is vested in the Federal Ministry of Environment (FMEnv). Internationally, agencies such as the World Bank, IFC and other financial organizations usually set environmental criteria for projects, which must be met by project proponents before the agencies finalise their investment decisions.

#### **4.1 Relevant National Regulatory Policy/ Framework**

##### **4.1.1 Federal Policy/Legislation**

The Act establishing the Federal Ministry of Environment places on it the responsibility of ensuring that all development and industry activity, operations and emissions are within the limits prescribed in the National Guidelines and Standards and comply with relevant regulations for environmental pollution management in Nigeria as may be released by the Ministry. To fulfil this mandate, a number of regulations/instruments are available (See section on National Legal Instruments on Environment), however the main instruments in ensuring that environmental and social issues are mainstreamed into development projects is the Environmental Impact Assessment (EIA) Act No. 86 of 1992. With this Act, the FMEnv prohibits public and private sectors from embarking on major prospects or activities without due consideration, at early stages, of environmental and social impacts. The act makes an EIA mandatory for any development project and prescribes the procedures for conducting and reporting EIA studies. As part of the effective utilization of the EIA tool, the Ministry has produced sectoral guidelines detailing the necessary requirements of the EIA process from each Sector. One of these Sectoral Guidelines that apply to the proposed project is the 'Sectoral Guidelines on Infrastructure Development.'

Procedurally, in Nigeria, it is worthy to note that before commencement of an EIA, the FMEnv issues a letter of intent on notification by the proponent, approve the terms of reference, ensure public participation, review and mediate.

The possible technical activities expected for a proposed project include screening, full or partial EIA Study, Review, Decision-making, Monitoring Auditing and Decommissioning/Remediation post-closure.

##### **4.1.1.1 The National Policy on the Environment (NPE) of 1989**

###### **National Legal Instruments on Environment**

The National Policy on Environment, 1989 (revised 1999), provides for "a viable national mechanism for cooperation, coordination and regular consultation, as well as harmonious management of the policy formulation and implementation process which requires the establishment of effective institutions and linkages within and among the various tiers of government – federal, state and local government".

The objective of the policy is to achieve sustainable development in Nigeria and in particular to:

- Secure a quality environment adequate for good health and well being
- Conserve the environment and natural resources for the benefit of present and future generations.
- Raise public awareness and promote understanding of the essential linkages between the environment resources and development and encourages individual and community participation in environmental improvement efforts
- Maintain and enhance the ecosystems and ecological processes essential for the functioning of the biosphere to preserve biological diversity;
- Co-operate with other countries, international organizations and agencies to achieve optimal use and effective prevention or abatement of trans-boundary environmental degradation.

**4.1.1.2 The National Urban Development Policy 1989**

This policy focuses on developing a dynamic and sustainable system of urban settlements, fostering economic growth, promoting efficient regional development, and ensuring improved standards of living and well-being for all Nigerians.

**4.1.1.3 National Economic Empowerment and Development Strategy (NEEDS) 2004**

NEEDS was launched in 2004 to boost economic growth and help achieve the MDGs (now SDGs). NEEDS focus on the establishment of a broad-based market-oriented economy involving the private sector, through which people can be empowered to attain the basic needs of life. A key strategy for attaining this objective is through projects like NFWP-SU.

**4.1.1.4 Environmental Impact Assessment Act No. 86, 1992 (FMEEnv)**

This Act provides guidelines for activities of development projects for which EIA is mandatory in Nigeria. The Act also stipulates the minimum content of an EIA as well as a schedule of projects, which require mandatory EIAs.

**4.1.1.5 The National Guidelines and Standards for Environmental Pollution Control in Nigeria of 2007**

This was launched by FEPA in March 12, 1991 and represents the basic instrument for monitoring and controlling industrial and urban pollution. The FEPA Act was replaced by the NESREA Act in 2007 and became the major statutory regulation or instrument guiding environmental matters in Nigeria.

**4.1.1.6 National Guidelines for Environmental Audit - Section 16 of EIA Act No.86, 1992**

Environmental Audit of section 16 under the EIA Act No. 86, is applied to existing projects rather than new developments as required by the EIA Act. These are designed to serve as a reference for compliance with the Environmental Audit requirements of the FMEEnv. It States that it is mandatory for a company to carry out an audit every 3 years or at the discretion of the Hon. Minister of the FMEEnv.

**4.1.1.7 National Air Quality Standard Decree No. 59 of 1991**

The FMEH is the regulatory agency charged with enforcing ambient air quality standards in Nigeria. The World Health Organization (WHO) air quality standards were adopted in 1991 as the national standards by the FMEH. These standards define the levels of air pollutants that should not be exceeded in order to protect public health.

**4.1.1.8 The National Environmental Standards and Regulations Enforcement Agency Act 2007 (NESREA Act)**

After the repealing of the Federal Environmental Protection Act of 1988, the NESREA Act, 2007 became the major statutory regulation or instrument guiding environmental matters in Nigeria. It specially makes provision for solid waste management and its administration and prescribes sanction for offences or acts, which run contrary to proper and adequate waste disposal procedures and practices.

The Federal Government through NESREA has developed Thirty-Three (33) Environmental Regulations which have been published in the Federal Republic of Nigeria Official Gazette and are now in force. Relevant regulations to NFWP-SU are presented in Table 13.

**Table 13: Environmental Regulations**

<b>Regulation</b>	<b>Description</b>
<b>National Environmental (Ozone Layer Protection) Regulations, S.I. No. 32, 2009.</b>	These provisions seek to prohibit the import, manufacture, sale and the use of ozone-depleting substances.
<b>National Environmental (Sanitation &amp; Waste Control) Regulations, S.I. No. 28, 2009.</b>	The purpose of this Regulation is to provides the legal framework for the adoption of sustainable and environment friendly practices in environmental sanitation and waste management to minimize pollution.
<b>National Environmental (Flood Erosion and Control) Regulation, S.I. No. 12, 2011.</b>	The overall objective of these Regulations is to check all earth-disturbing activities, practices or developments for non-agricultural, commercial, industrial and residential purposes

<b>Regulation</b>	<b>Description</b>
<b>National Environmental (Desertification Control and Drought Mitigation) Regulations S.I, No. 13, 2011.</b>	This Regulation seeks to provide an effective and pragmatic regulatory framework for the sustainable use of all areas already affected by desertification and the protection of vulnerable lands.
<b>National Environmental (Control of Bush/Forest Fire &amp; Open Burning) Regulations S.I, No. 15, 2011.</b>	The principal thrust of these Regulations is to prevent and minimize the destruction of ecosystem through fire outbreak and burning of any material that may affect the health of the ecosystem through the emission of hazardous air pollutants
<b>National Environmental (Hazardous Chemicals &amp; Pesticides) Regulations, S.I. No 65, 2014.</b>	The objective of these Regulations is to protect human health and the environment from the harmful effects of hazardous chemicals and pesticides, and other agro chemicals. It also contributes to the sustainable development of agriculture and the conservation of the environment.
<b>National Environmental (Air Quality Control) Regulations, S.I. No. 64, 2014.</b>	The purpose of these Regulations is to provide for improved control of the nation's air quality to such an extent that would enhance the protection of flora and fauna, human health and other resources affected by air quality deteriorations.

## **Other Acts and Legislations**

### **4.1.1.9 Land Use Act of 1978**

The land-use Act of 1978 States that "It is also in the public interest that the rights of all Nigerians to use and enjoy land in Nigeria and the Natural fruits thereof in sufficient quality to enable them to provide for the sustenance of themselves and their families should be assured, protected and preserved". This implies that acts that could result in the pollution of the land, air, and waters of Nigeria negates this law, and is therefore unacceptable. Furthermore, the Land Use Act of 1978 remains the primary legal means to acquire land in the country. The Act vests all land comprised in the territory of each state in the Federation in the Governor of the state and requires that such land shall be held in trust and administered for the use and common benefit of all Nigerians in accordance with the provisions of this Act.

According to the Act, administration of land area is divided into urban land which will be directly under the control and management of the Governor of each State; and non-urban land, which will be under the control and management of the Local Government. State Governors are given 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.

### **4.1.1.10 Forestry Act**

This Act of 1958 provides for the preservation of forests and the setting up of forest reserves. It is an offence, punishable with up to 6 months imprisonment, to cut down trees over 2ft in girth or to set fire to the forest except under special circumstances.

Nigeria is at present a wood deficit nation. In order to ameliorate the situation, the policy on forest resources management and sustainable use is aimed at achieving self-sufficiency in all aspects of forest production through the use of sound forest management techniques as well as the mobilization of human and material resources. The overall objectives of forest policy are to prevent further deforestation and to recreate forest cover, either for productive or for protective purposes, on already deforested fragile land.

Specifically, the National Agricultural Policy of 1988 in which the Forestry Policy is subsumed, provides for:

- Consolidation and expansion of the forest estate in Nigeria and its management for sustained yield.
- Regeneration of the forests at rates higher than exploitation.
- Conservation and protection of the environment viz: forest, soil, water, flora, fauna and the protection of the forest resources from fires, cattle grazers and illegal encroachment.

- Development of Forestry industry through the harvesting and utilisation of timber, its derivatives and the reduction of wastes.
- Wildlife conservation, management and development through the creation and effective management of national parks, game reserves, tourist and recreational facilities, etc.

#### **4.1.1.11 Criminal Code**

The Nigerian Criminal Code makes it an offence punishable with up to 6 months imprisonment for any person who:

- Violates the atmosphere in any place so as to make it noxious to the health of persons in general dwelling or carry on business in the neighbourhood, or passing along a public way: or
- Performs any act which is, and which he knows or has reason to believe to be likely to spread the infection of any disease dangerous to life, whether human or animal.

#### **4.1.1.12 Occupational Health & Safety**

Nigerian occupational health & safety laws include:

##### **4.1.1.12.1 Workmens Compensation Act of 1987**

Employers are to adhere to the provisions of the Workmen's Compensation Act 1987, reviewed 2010.

##### **4.1.1.12.2 Factories Act and Labour Law**

An employer is required to protect the health and safety of workers at the workplace in accordance with provisions of the Factories Act and Labour Law (Cap F1 LFN 2004). It is obligatory for the employer, under employment contract to provide safe systems and place of work and to take measures to ensure the safety of the worker.

##### **4.1.1.12.3 Child Labour**

According to the ILO's Child Labour Convention 138 on the minimum age of admission for employment, and Convention No 182 on the Worst Forms of Child Labour, member countries such as Nigeria have an obligation to respect, promote and realize the abolition of child labour. Child labour refers to work that deprives children (any person under the age of eighteen years) of their childhood, potential, and dignity, which is harmful to their physical and/or mental development.

#### **4.1.2 National polices**

- The National Action Plan for the Implementation of United Nations Security Council Resolution 1325 (2009);
- The National Gender Policy (2010)
- Violence Against persons Prohibition Act (2015)

Nigeria is among the ten percent of countries worldwide that exhibit the highest levels of gender discrimination according to the OECD's Social Institutions and Gender Index, with an assessment of "high" or "very high" in all of the evaluated categories (discriminatory family code, restricted physical integrity, son bias, restricted resources and assets, restricted civil liberties). It also falls into the group of countries with highest gender inequality in human development outcomes (UNDP 2016). However, the VAPP - Violence Against Persons (Prohibition) Act was signed into law in 2015, to respond to Sexual and Gender Based Violence of girls, women, boys and men but several States are yet to adopt this act including participating States.

#### **4.2 International Treaties**

- The International Covenant on Civil and Political Rights (ICCPR) (2004)
- The International Covenant on Economic, Social and Cultural Rights (ICESCR) (2004)
- The Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (CAT) (1993)
- The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) (1984)
- The Convention on the Rights of the Child (CRC) (1990), and the Convention on the Rights of Persons with Disabilities (CRPD) (2012)
- International Convention on the Elimination of All Forms of Racial Discrimination (1976)

#### **4.3 Regional Treaties**

- The African Charter on Human and Peoples' Rights (ACHPR) (1982)
- The African Charter on the Rights and Welfare of the Child (ACRWC) (2007)
- The Protocol to the ACHPR on the Rights of Women in Africa (the "Maputo Protocol") (2007)

#### **4.4 Other relevant specific State Laws & Policies**

Some other Laws and policies in some of the States include:

- State Environmental Sanitation Edicts, Laws and Enforcement Agencies - Making and enforcing environmental and health polices and laws.

##### **4.4.1 Gender Based Violence in participating States**

Two key national laws address GBV, the Child Rights Act (CRA, 2003), and the Violence Against Persons Prohibition Act (VAPP, 2015) which have been passed by the Federal Capital Territory (FCT) but not by many of the 36 states, making them inapplicable in those that haven't adopted them. While CRA has been passed in 24 states, VAPP has been passed in 4 states in addition to the FCT. Where laws are domesticated, implementation remains weak as institutional capacities are weak (social welfare, police, family courts). In practice, the legal and judicial systems provide women and children with little protection against violence, and timely and adequate support services are scarce and often ill equipped to respond to survivors' needs. Participating States operate these laws to address State GBV matters, which may arise on NFWP-SU project sites.

#### **4.5 International Laws and Regulations**

Nigeria is also a signatory to the following relevant international conventions:

- International Convention on Economic, Social and Cultural Rights (ICESCR)
  - International Union for Conservation of Nature and Natural Resources (IUCN) Guidelines
  - Convention on the Elimination of all Forms of Discrimination against Women (CEDAW)
  - Convention Concerning the Protection of the World Cultural and National Heritage Sites (World Heritage Convention)
  - The Framework Convention on Climate Change, Kyoto Protocol, 1995;
  - United Nations Framework Convention on Climate Change (1992)
  - Convention on Rights of the Child (CRC)
  - The African Convention on the Conservation of Nature and Natural Resources, The African Convention, 1968;
  - The Convention Concerning the Protection of the World Cultural and Natural Heritage, The World Heritage Convention, 1972;
  - The Basel Convention on the Control of Trans-boundary Movement of Hazardous Waste and Disposal, 1989;
  - The Convention on Biological Diversity, 1992;
  - Bamako Convention on the Ban of the Import into Africa and the Control of Trans-boundary Movement and Management of Hazardous Waste within Africa 1991.
- Nigeria also has obligations to protect the environment through various commitments to the African Union (AU), the Economic Community of West African States (ECOWAS) and the Commonwealth.

##### **4.5.1 International Treaties Relevant to GBV**

**The International Covenant on Civil and Political Rights (ICCPR) (2004)** - Recognizing the ideal of free human beings enjoying civil and political freedom and freedom from fear and want can only be achieved if conditions are created whereby everyone may enjoy his civil and political rights, as well as his economic, social and cultural rights,

**The International Covenant on Economic, Social and Cultural Rights (ICESCR) (2004)** - Recognizing the right of self-determination. By virtue of that right they freely determine their political status and freely pursue their economic, social and cultural development

**The Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (CAT) (1993)** - Recognizing the right not to be deliberately or intentionally inflicted with severe pain or suffering, whether physical or mental, for such purposes as obtaining information or a confession.

**The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) (1984)** - Recognizing the right not to have any distinction, exclusion or restriction made on the basis of sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, on a basis of equality of men and women.

**The Convention on the Rights of the Child (CRC) (1990)** - Recognizing the child's right to non-discrimination; a devotion to the best interests of the child, the right to life, survival and development and respect for the views of the child.

**Convention on the Rights of Persons with Disabilities (CRPD) (2012)** - This is the protection of the rights of persons with disabilities against interference or attacks and States. Parties shall protect the privacy of personal, health and rehabilitation information of persons with disabilities on an equal basis with others.

**International Convention on the Elimination of All Forms of Racial Discrimination (1976)** - to eliminate all forms of racial discrimination and to promote understanding amongst all races.

#### **4.6 World Bank Environmental and Social Environmental & Social Framework standards**

The environmental and social Environmental & Social Framework standards (ESSs) of the World Bank relevant through the project life cycle of NFWP-SU Scale-up will include six of the ten (10) E&S standards compliance standards (ESS1-10). The Standards are:

- **Environmental and Social Standard 1 (ESS1): Assessment and management of Environmental and Social Risks and Impacts;**
- **Environmental and Social Standard 2 (ESS2): Labor and Working Conditions;**
- **Environmental and Social Standard 3 (ESS3): Resource Efficiency and Pollution Prevention and Management;**
- **Environmental and Social Standard 4 (ESS4): Community Health and Safety;**
- **Environmental and Social Standard 5 (ESS5): Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**
- Environmental and Social Standard 6 (ESS6): Biodiversity Conservation and Sustainable Management of Living Natural Resources
- Environmental and Social Standard 7 (ESS7): Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
- Environmental and Social Standard 8 (ESS8): Cultural Heritage;
- Environmental and Social Standard 9 (ESS9): Financial Intermediaries; and
- **Environmental and Social Standard 10 (ESS10): Stakeholder Engagement and Information Disclosure**

Environmental and Social Standard ESS1 applies to all projects for which Bank Investment Project Financing is required. ESS1 establishes the importance of:

- (a) the NFWP-SU's existing environmental and social framework in addressing the risks and impacts of the project;
- (b) an integrated environmental and social assessment to identify the risks and impacts of a project;
- (c) effective community engagement through disclosure of project-related information, consultation and effective feedback; and
- (d) management of environmental and social risks and impacts by the NFWP-SU throughout the project life cycle.

It is a requirement of the bank that all environmental and social risks and impacts of the project be addressed as part of the environmental and social assessment conducted in accordance with ESS1. ESS2-10 set out the obligations of the NFWP-SU in identifying and addressing environmental and social risks and impacts that may require particular attention. These Standards establish objectives and requirements to avoid, minimize, reduce and mitigate risks and impacts, and where significant residual impacts remain, to compensate for or offset such impacts. These standards are summarized as follows:



#### **4.6.1 Environmental and Social Standard 1 (ESS1): Assessment and management of Environmental and Social Risks and Impacts**

ESS1 sets out the NFWP-SU's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing, in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESS).

The ESS are designed to help NFWP-SUs to manage the risks and impacts of a project, and improve their environmental and social performance, through a risk and outcomes-based approach. The desired outcomes for the project are described in the objectives of each ESS, followed by specific requirements to help NFWP-SUs achieve these objectives through means that are appropriate to the nature and scale of the project and proportionate to the level of environmental and social risks and impacts.

NFWP-SUs will conduct environmental and social assessment of projects proposed for Bank financing to help ensure that projects are environmentally and socially sound and sustainable. The environmental and social assessment will be proportionate to the risks and impacts of the project. It will inform the design of the project and be used to identify mitigation measures and actions and to improve decision making. NFWP-SUs will manage environmental and social risks and impacts of the project throughout the project life cycle in a systematic manner, proportionate to the nature and scale of the project and the potential risks and impacts.

#### **4.6.2 Environmental and Social Standard 2 (ESS2): Labor and Working Conditions**

ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. NFWP-SUs can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. Workers can be the direct, contracted, community & primary supply workers. Labor risks could be triggered by a lack of transparency and misunderstanding of terms and conditions of employment, nonadherence to equal opportunity and fair treatment, resistance to organized labor unions, tolerance to child and forced labor practices, absence of workers GRM and, non-adherence to OHS requirements. The objectives of ESS2, which shall guide the operationalisation of this ESMF are:

- To promote safety and health at work. Consequently, measures related to occupational health and safety (OHS) will be applied to the NFWP-SU.
- To promote the fair treatment, non-discrimination and equal opportunity of project workers.
- To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.
- To prevent the use of all forms of forced labor and child labor.
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.
- To provide project workers with accessible means to raise workplace concerns. This will be carried out by providing a grievance mechanism for the workforce.

#### **4.6.3 Environmental and Social Standard 3 (ESS3): Resource Efficiency and Pollution Prevention and Management**

ESS3 recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. The current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of current and future generations. At the same time, more efficient and effective resource use, pollution prevention and GHG emission avoidance, and mitigation technologies and practices have become more accessible and achievable. This ESS sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life cycle consistent with GIIP.

- To promote the sustainable use of resources, including energy, water and raw materials.
- To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities.
- To avoid or minimize project-related emissions of short and long-lived climate pollutants.

- To avoid or minimize generation of hazardous and non-hazardous waste. If the generated waste is considered hazardous, NFWP-SU will comply with existing requirements for its management, which will therefore include the storage, transportation and disposal of the waste.  
To minimize and manage the risks and impacts associated with pesticide use, for which an IPMP has been prepared as a standalone document and is presented as an annex (annex 19) to this ESMF.

Consequently, NFWP-SU will consider ambient conditions and apply technically and financially feasible resource efficiency and pollution prevention measures in accordance with the mitigation hierarchy. The measures will be proportionate to the risks and impacts associated with the project and consistent with GIIP, in the first instance the EHSGs. The NFWP-SU will implement technically and financially feasible measures for improving efficient consumption of energy, water and raw materials, as well as other resources. Such measures will integrate the principles of cleaner production into product design and production processes to conserve raw materials, energy and water, as well as other resources. Where benchmarking data are available, the project will make a comparison to establish the relative level of efficiency.

#### **4.6.4 Environmental and Social Standard 4 (ESS4): Community Health and Safety**

ESS4 recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration or intensification of impacts due to project activities.

ESS4 addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of NFWP-SUs to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable.

- To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life cycle from both routine and nonroutine circumstances.
- To promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams.
- To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials
- To have in place effective measures to address emergency events.
- To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.

This ESS addresses potential risks and impacts on communities that may be affected by project activities. Occupational health and safety (OHS) requirements for project workers are set out in ESS2, and measures to avoid or minimize impacts on human health and the environment due to existing or potential pollution are set out in ESS3. Thus, NFWP-SU will evaluate the risks and impacts of the project on the health and safety of the affected communities during the project life cycle, including those who, because of their particular circumstances, may be vulnerable. The NFWP-SU will identify risks and impacts and propose mitigation measures in accordance with the mitigation hierarchy.

When the NFWP-SU retains direct or contracted workers to provide security to safeguard its personnel and property, it will assess risks posed by these security arrangements to those within and outside the project site. In making such arrangements, the NFWP-SU will be guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such security workers. The NFWP-SU will not sanction any use of force by direct or contracted workers in providing security except when used for preventive and defensive purposes in proportion to the nature and extent of the threat.

The NFWP-SU will seek to ensure that government security personnel deployed to provide security services act in a manner consistent with provisions for sexual exploitation (SEA) and abuse as well as sexual harassment (SH) and encourage the relevant authorities to disclose the security arrangements for the NFWP-SU's facilities to the public, subject to overriding security concerns.

#### **4.6.5 Environmental and Social Standard 5 (ESS5): Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

ESS5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons. Project-related land acquisition or restrictions on land use may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood), or both. The term "involuntary resettlement" refers to these impacts. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement.

1 "*Land acquisition*" refers to all methods of obtaining land for project purposes, which may include outright purchase, expropriation of property and acquisition of access rights, such as easements or rights of way. Land acquisition may also include:

(a) Acquisition of unoccupied or unutilized land whether or not the landholder relies upon such land for income or livelihood purposes; (b) repossession of public land that is used or occupied by individuals or households; and (c) project impacts that result in land being submerged or otherwise rendered unusable or inaccessible. "Land" includes anything growing on or permanently affixed to land, such as crops, buildings and other improvements, and appurtenant water bodies.

2 "*Restrictions on land use*" refers to limitations or prohibitions on the use of agricultural, residential, commercial or other land that are directly introduced and put into effect as part of the project. These may include restrictions on access to legally designated parks and protected areas, restrictions on access to other common property resources, and restrictions on land use within utility easements or safety zones.

3 "*Livelihood*" refers to the full range of means that individuals, families and communities utilize to make a living, such as wage-based income, agriculture, fishing, foraging, other natural resource-based livelihoods, petty trade and bartering.

Experience and research indicate that physical and economic displacement, if unmitigated, may give rise to severe economic, social and environmental risks: production systems may be dismantled; people face impoverishment if their productive resources or other income sources are lost; people may be relocated to environments where their productive skills are less applicable and the competition for resources greater; community institutions and social networks may be weakened; kin groups may be dispersed; and cultural identity, traditional authority, and the potential for mutual help may be diminished or lost. For these reasons, involuntary resettlement should be avoided. It should however be noted that where involuntary resettlement is unavoidable, it will be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented.

- To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives.
- To avoid forced eviction.
- To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by: (a) providing timely compensation for loss of assets at replacement cost and (b) assisting displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.
- To improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure.
- To conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable displaced persons to benefit directly from the project, as the nature of the project may warrant.
- To ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected.

A standalone RF has been prepared for the NFWP-SU to provide further clarification and guidelines on sub-projects that may trigger the ESS5.

#### **4.6.6 Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure**

This ESS recognizes the importance of open and transparent engagement between the NFWP-SU and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management and monitoring of the project's environmental and social risks and impacts.

This ESS must be read in conjunction with ESS1. Requirements regarding engagement with workers are found in ESS2. Special provisions on emergency preparedness and response are covered in ESS2 and ESS4. In the case of projects involving involuntary resettlement, Indigenous Peoples or cultural heritage, the NFWP-SU will also apply the special disclosure and consultation requirements set out in ESS5, ESS7 and ESS8.

- To establish a systematic approach to stakeholder engagement that will help NFWP-SUs identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow NFWP-SUs to respond to and manage such grievances.

#### **4.6.7 Environmental and Social Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources**

ESS6 recognises that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development. It recognises the importance of maintaining core ecological functions of habitats, including forests, and the biodiversity it supports. Habitat is defined as terrestrial, freshwater, or marine geographic unit or airway that supports assemblages of living organisms and their interactions with the non-living environment. The E&S assessment to assess applicability of ESS6 considers threats to biodiversity such as habitat loss, degradation and fragmentation, invasive alien species, over-exploitation, hydrological changes and examine an approach that would best avoid these adverse impacts in accordance with the mitigation hierarchy.

NFWP SU will have minimal environmental and social risks and impacts associated with the activities, such as training and exposure visits, office setup, support in storage facilities, drying yards, and higher volume weighing scales. Even though the activities are expected to have minimal E&S impacts due to the limited scale of the activities, there are inherent Environmental, Social Health and Safety (ESHS) risks. These include noise, dust emission, solid waste, occupational and community health and safety risks common to civil works, procurement of non-energy efficient energy machinery, organic waste and wastewater discharges from the processing machinery, and the risks of communicable diseases, including COVID-19. However, ESS6 is not applicable to activities that will be implemented under the NFWP-SU as they do not present risks to biodiversity or natural habitats.

#### **4.7 Nigeria EIA Guidelines and World Bank EA Guidelines**

The Environmental Impact Assessment Act No. 86 of 1992 requires that development projects be screened for their potential impact. Based on the screening, a full, partial, or no

Environmental impact assessment may be required. Guidelines issued in 1995 direct the screening process and provides guidelines that are captured in the subsequent section. Thus, for this ESMF, the Nigeria's *EIA* requirements and World Bank operational procedures were harmonised as far as possible, hence it is made responsive to the objectives of good practice. It is especially made responsive with regard to the followings:

- Early consideration of environmental and social issues (starting at the screening stage);
- Identification and early consultation with stakeholders;
- Prevention of adverse impacts through the consideration of feasible alternatives; and
- Incorporation of mitigation measures into planning and (engineering) design.

#### **4.7.1 Screening Process**

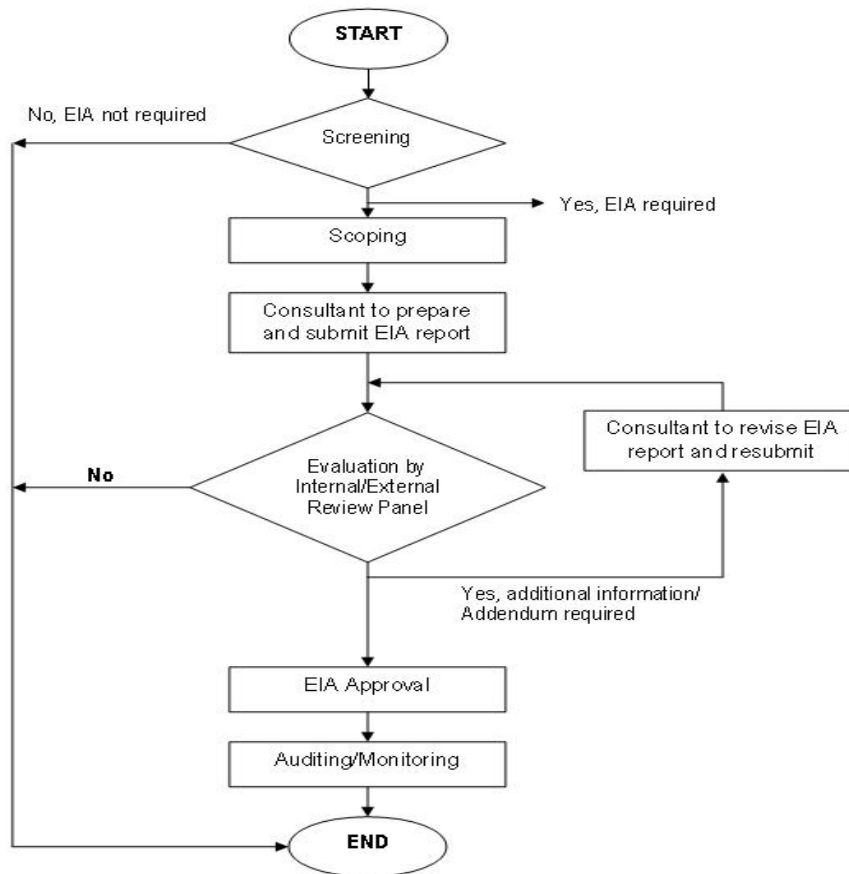
The objective of screening is to determine the appropriate level of environmental and social impact assessment and management for a proposed subproject. The Environmental and Social screening process characterizes sub-projects and activities that will require thorough environmental review to prevent/mitigate negative environmental impacts or those which will provide opportunities to enhance positive impacts.

In other words, based on environmental and social screening, sub-projects with no noticeable impacts are cleared from an environmental and social perspective; subprojects with some impacts proceeds to another level of environmental and social assessment, which will be evaluated to clear the subproject.

All potential project intervention sites in the participating States will be screened for Environmental and Social (E&S) impacts prior to approval by the SPCUs. A designated officer and/or consultant of the State PCUs can carry out the screening. The screening process will include robust assessment of the project to determine:

1. The appropriate project categorization EA;
2. Applicable World Bank E&S standards compliance;
3. Potential for environmental and social liability; and
4. Cultural or other sensitivities

In addition, each project will be screened to identify relevant stakeholders and, the nature and extent of engagement for each stakeholder category. The report of the screening exercise, according to both Nigeria EIA decree (process is as presented in Figure 4) and World Bank requirements, will be sent to the World Bank for review and approval. In addition, following the review of the screening and scoping, the terms of reference (TOR) and the reports of the ESIA/ESMP that would be prepared will be sent to the World Bank for review and approval prior to disclosure in Nigeria and at the World Bank external website.



**Figure 4: The EIA Process in Nigeria**

**4.7.1.1 Environmental and Social Management Plan (ESMP)**

The NFWP-SU project and all sub-projects shall be required to maintain comprehensive ESMPs to achieve health, safety, and environmental regulatory compliance objectives, institutional requirements (e.g., World Bank), and other related commitments. An ESMP is an important element of the NFWP-SU's overall Environmental and Social Management Strategy to ensure environmental, social, and health performance of the entire project and sub-projects. To this end, the ESMPs will focus on policy, management of personnel, competence building, communications with the public, and monitoring.

Environmental and Social Management Plans for each sub-project will be required at two stages:

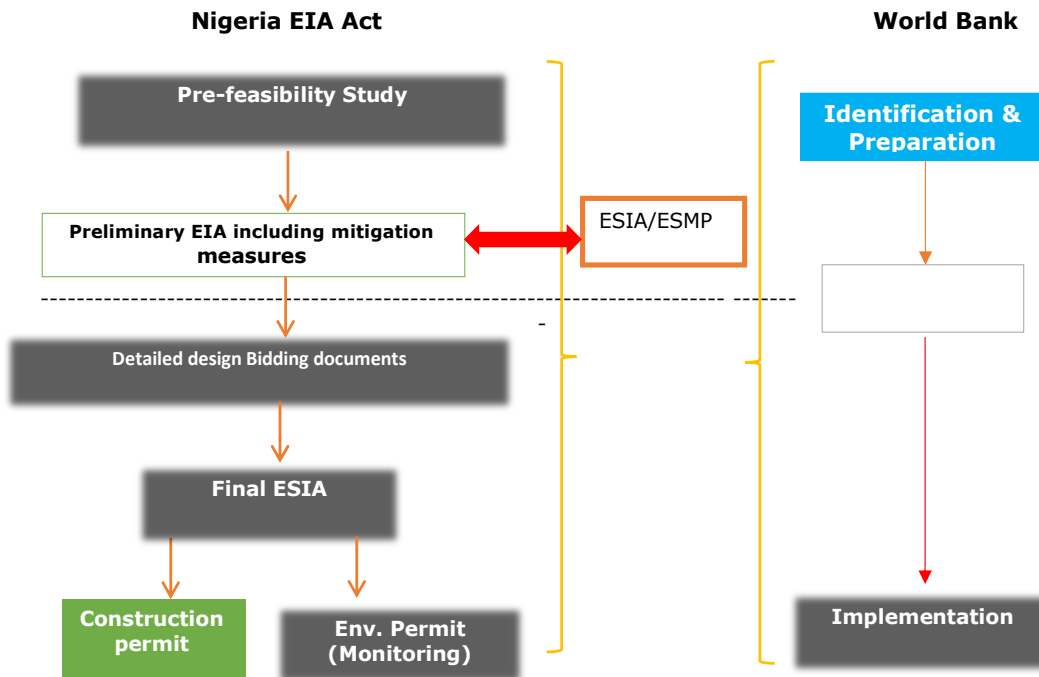
- During the proposal stage, each intending State PCU will as part of its proposal, submit an overview of how environmental and social issues of the project will be addressed on a continuous basis. The plans will also specify standards proposed for the sub-project to ensure environmental sustainability and social acceptability. Standards and plans proposed to address social issues including involuntary resettlement and legacy issues.
- Environmental assessment will determine the extent of impacts and how the impacts will be mitigated, or minimized by planning, approaching the activities in an environmentally and socially sensitive manner and adopting specific mitigation measures.

Generally, the screening process for the execution of this ESMF involves an assessment of sub-project to determine:

- The appropriate project categorization for EA;
- Applicable World Bank E&S standards compliance;
- Potential for environmental and social liability; cultural or other sensitivities

The environmental and social screening is intended to provide inputs into identification of potential impacts with the implementation of the NFWP-SU interventions. Preparation of EIA/EA/ESIA is a process whose breadth, depth and type of analysis depend on the nature, scale, and the potential environmental impact of the proposed project. The EA evaluates a

project’s potential environmental risks and impacts in its area of influence; identifies ways of improving project planning, design and implementation by preventing, minimizing, mitigating, or compensating for adverse environmental impacts enhancing positive impacts, including throughout the project implementation. The World Bank favours preventative measures over mitigation or compensatory measures, whenever feasible. The integration of the WB process into the Nigerian EIA guidelines is illustrated in Figure 4.



**Figure 5: Integration of WB EA Requirements with Nigeria EIA ACT**

The categorisation for EA is done through the use of an Environmental Screening Checklist (See Annex 2 for checklist) of sub-projects to determine if they fall under any other EA Categories (A, B or C) and Nigeria EIA categories 1, 2 and 3.

**Category A** - projects are those whose impacts are sensitive, diverse, unprecedented, felt beyond the immediate project environment and are potentially irreversible over the long term. Such projects require full ESIA.

**Category B** - Projects will result in adverse environmental impacts on human populations or environmentally important areas-including wetlands, forests, grasslands, and other natural habitats-that are less adverse than those of Category A projects. In general, such impacts are localized; do not affect sensitive area/resources, and reversible, unlike Category A projects. All category B projects will also require EA/ESMP.

**Category C** - Projects are generally benign and typically do not require EA. However, all such progress should be screened to determine if specific environmental management plans (e.g., waste management plan) are required.

Based on the scope of the projects, the number of participating States involved in this project and the stakeholders, the project is categorised a World Bank category B and Category 2 for Nigerian EIA category. The report from the screening and scoping exercise will be reviewed and forwarded to the World Bank for concurrence.

**4.8 NFWP-SU - Adequacy of Legal Instruments for Environmental & Social Issues**

Generally, with regard to environmental and social management issues, legislation is in a continuing process of development in Nigeria. Amongst the existing pieces of legislations

highlighted above, there are a number of local, national and international environmental guidelines applicable to the sub-projects under the proposed NFWP-SU project. *In other words, the participating States have a good governance framework and laws to back up and manage the potential environmental and social management issues that are envisaged.*

The officials of the MDAs in these States are also conversant with the Environmental Assessment (EA) legislation, procedures and framework applicable based on the Federal EIA Act 86 of 1992. In addition, although there are no State laws, the Land Use Act guides the processes of land acquisition and compensation in the various States, which include:

- Identification of Lands or Sites for various developments
- The Publication/Service of Acquisition Notices
- Enumeration/Inspections, assessment of compensation and the payment of it.
- Documentation of Acquisitions and Gazetting

Thus, for the NFWP-SU sub-projects, there are guidelines to ensure that the project succeeds from an environmental and social perspective. The main challenge would be enforcement of these legislation/guidelines, since most State Government-owned projects, for instance, rarely or are not accustomed to using EA tool for state-owned project.

In addition, there are problems of inadequate funding, weak human capacity especially in the new participating States (in comparison to the States that have been trained under the first phase) etc. Hence, as part of this ESMF, in order to support the due diligence process, to avoid causing harm or exacerbating social tensions, and to ensure consistent application of mitigation measures to social and environmental issues across the sub-project intervention areas, institutional capacity strengthening, and funding have been recommended.

Finally, the World Bank provides a number of operational and Environmental & Social Framework standards, which aim to prevent and mitigate undue harm to people and their environment in any development initiative involving the Bank. The Nigerian EIA Act and the World Bank Environmental & Social Framework standards are similar. ESS1 and Nigerian EIA Act are also similar. World Bank EA Screening Category A is similar to Nigerian EIA Act category I, World Bank EA Category B is equivalent to Nigeria EIA Act Category II, World Bank EA Category C is equivalent Nigeria EIA Act Category III. Nevertheless, in the event of divergence between the two, the World Bank environmental & social framework shall take precedence over Nigeria EA laws & guidelines, for NFWP-SU intervention projects. Table 14 presents Gaps between Nigeria’s laws and regulations and the WB ESS. It also provides how these gaps can be addressed.

**Table 14: Nigerian Laws & regulations in comparison with the World Banks ESS**

<b>Project Triggered Policies</b>	<b>Nigerian Legislation</b>	<b>World Bank ESS</b>	<b>Gaps between both &amp; how they will be addressed</b>
<b>ESS1 Environmental Assessment</b>	National EIA Act 1992, Clause 2 provides that public or private sector of the economy shall not undertake or embark on or authorize projects or activities without prior consideration of the effects on the environment. The act makes an EIA mandatory for any development project and prescribes the procedures for conducting and reporting EIA studies. As part of the effective utilization of the EIA tool, the ministry has produced sectarian guidelines. Responsibility for monitoring of EIA activities lies with the NESREA and State ministries of environment but these agencies	An EA is conducted to ensure that Bank-financed projects are environmentally sound and sustainable, and that decision-making is improved through appropriate analysis of actions and of their likely environmental impacts. Any World Bank project that is likely to have potential adverse environmental risks and impacts in its area of influence requires an EA indicating the potential risks, mitigation measures and	Nigeria currently has a comprehensive framework for assessing and managing the environmental impacts of development projects. However, in comparison with the World Bank ESS, it would appear that the Nigeria framework lacks the provision of clear requirements or guidance in the assessment of the impact of an activity on public health. In this case the ESS of the WB will apply.



<b>Project Triggered Policies</b>	<b>Nigerian Legislation</b>	<b>World Bank ESS</b>	<b>Gaps between both &amp; how they will be addressed</b>
	lack the logistic capability to carry out the tasks assigned to it by the law	environmental management framework or plan.	
<b>Environmental and Social Standard 2 (ESS2): Labor and Working Conditions</b>	The Nigerian Labour Act 2004, which was put in place to replace the law established in 1990 looks into the rights, working conditions, minimum wage, termination clauses and many other rules set by the government of Nigeria.	ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth and therefore it promotes sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. Workers can be the direct, contracted, community & primary supply workers.	Nigeria has a comprehensive framework for assessing and managing labour and employee/employer relations, generally, while the ESS2 also provides a more comprehensive approach to addressing key labour risks. For the implementation of the ESMF, the provisions of the ESS2 will be adopted, which includes preparation of a Labour Management Plan (LMP) in annex 11.
<b>Environmental and Social Standard 3 (ESS3): Resource Efficiency and Pollution Prevention and Management</b>	The NESREA Act, 2007 is the major statutory regulation or instrument guiding environmental matters in Nigeria through the enforcement of the Thirty-Three (33) Environmental Regulations and so the responsibility for monitoring of EIA activities lies with the NESREA and State ministries of environment but these agencies lack the logistic capability to carry out the tasks assigned to it by the law	This ESS sets out the requirements to address resource efficiency and pollution <sup>1</sup> prevention and management throughout the project life cycle consistent with GIIP.	The different categories of legislation provide a proper national framework for addressing issues regarding resource efficiency, pollution prevention and management. However, there is a likelihood that in comparison with the ESS, it appears that the multiplicity of the laws will make it cumbersome in application, while the more easily applicable ESS will better manage both time and resources on development projects. In case of a conflict in approach, the ESS3 will apply. Therefore, an IPMP has been prepared as a standalone plan to accompany this ESMF.
<b>ESS4 Community Health &amp; Safety</b>	The basic legal requirements for occupational health & safety are guided by the Workmen's Compensation Act 1987, reviewed 2010.	This ESS addresses potential risks and impacts on communities that may be affected by project activities. Occupational health and safety (OHS) requirements for project workers are set out in ESS2, and measures to avoid or minimize impacts on human health and the environment due to existing or potential pollution are set out in ESS3	Nigerian has very clear legislation on OHS that focuses more on employee/workers safety and presents proper guidelines on the roles and responsibilities of employers, in this regard. However, the responsibilities towards community/public health & safety in managing development projects is not clearly articulated. In the event of divergence between the two, the ESS4 shall take precedence over Nigeria EA laws, guidelines and or standards

<b>Project Triggered Policies</b>	<b>Nigerian Legislation</b>	<b>World Bank ESS</b>	<b>Gaps between both &amp; how they will be addressed</b>
<b>ESS5 Involuntary Resettlement</b>	<p>The basic legal framework for the acquisition of land in Nigeria is the Land Use Act 1978 as amended under the Amended Land Use Act of 2004, Chapter L5 under the laws of the Federation of Nigeria. The Part 1 of the amended Act 2004 vests all land within the urban areas of any Nigerian State in the Executive Governor of that state. Land within the rural areas of the state is vested on the Local Government. The Part VI, Section 29 of the law provides for compensation to the holder of any land title when such land is to be acquired for public purposes. For developed land, the Governor (in the case of urban areas) or Local Government (in the case of rural areas) may, in lieu of compensation, offer resettlement in any other place as a reasonable alternative accommodation and in acceptance of resettlement, the holder's right to compensation shall be deemed to have been duly satisfied.</p> <p>Although the Land Use Act is not strictly an Act for environmental protection, protection of the environment is one of the considerations which a holder of certificate of occupancy has to observe.</p>	<p>Key objectives of the World Bank's policy on involuntary land acquisition are to avoid or minimize involuntary resettlement where feasible, exploring all viable alternative project designs; assist displaced persons in improving their former living standards, income earning capacity and production level, or at least in restoring them; encourage community participation in planning and implementing resettlement; and provide assistance to affected people regardless of the legality of land tenure. The policy covers not only physical relocation, but any loss of land or other assets resulting in relocation, or loss of shelter; loss of assets or access to assets; loss of income sources or means of livelihood whether or not the affected people must move to another location. When the policy is triggered, a Resettlement Action Plan (RAP), must be prepared. An abbreviated plan may be developed when less than 200 people are affected by the project. In situations, where all the precise impacts cannot be assessed during project preparation, provisions are made for preparing a Resettlement Framework (RF). The RAP/RF must ensure that all Bank's policy provisions detailed in ESS5 are addressed particularly the payment of compensation for affected assets at their replacement cost</p>	<p>Essentially, there is no difference between the main framework of both policies. Land that would be acquired for this project shall be fully compensated for in accordance with the World Bank policy and principles.</p> <p>The Nigerian regulations while also lacking clear responsibility for monitoring of activities associated with compensations further lacks the logistic capability for any agency to carry out the tasks assigned to it by the law In the event of divergence between the two, the ESS5 shall take precedence over Nigeria EA laws, guidelines and or standards.</p> <p>Therefore, the NFWP SU will have stand-alone RF to address issues of involuntary resettlement that may arise.</p>
<b>Environmental and Social Standard 10 (ESS10):</b>	<p>The consultation and public disclosure stages are important milestones under the EIA process of the Nigerian EIA Act</p>	<p>This ESS recognizes the importance of open and transparent engagement with project stakeholders</p>	<p>Both the Nigerian law and the ESS recognize the advantage of effective stakeholder engagement in improving the</p>

<b>Project Triggered Policies</b>	<b>Nigerian Legislation</b>	<b>World Bank ESS</b>	<b>Gaps between both &amp; how they will be addressed</b>
<b>Stakeholder Engagement and Information Disclosure</b>	of 1992 and emphasises the need for proponents to comply with public notice and review procedures.	as an essential element of good international practice. In addition, the provisions for disclosure will ensure that stakeholders are kept abreast of the project implementation through an inclusive process conducted throughout the project life cycle.	environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. In comparison, the stakeholder engagement approach and disclosure process for the ESS is more comprehensive and inclusive and will be adopted in the implementation of the SU. In the event of divergence between the two, the ESS10 shall take precedence over Nigeria EA laws, guidelines and or standards

## **CHAPTER FIVE**

### **DETERMINATION OF POTENTIAL ENVIRONMENTAL & SOCIAL IMPACTS**

#### **5.0 Introduction**

This chapter presents a summary of the impacts that are likely to be as a result of the interaction between the project components and the environmental & social elements. The method of impact identification and evaluation is also provided.

So, any sub-project under the NFWP-SU, whether it is simple and small, or large and complex has some level of impacts on the environment and socioeconomics. The environmental and social impacts may be of different dimensions (beneficial or adverse, primary or secondary, synergistic or cumulative etc). However, the main objective of impact identification especially with emphasis to the NFWP-SU is to identify and prioritize areas that are likely to be affected by the implementation of sub-projects and offer suitable mitigation measures. Environmental and social impacts, by definition, imply an alteration of environmental conditions or creation of new sets of adverse or beneficial environmental and social consequences caused by the action under consideration.

Consequently, this ESMF incorporates a number of elements into an overall Environmental and Social Management process for the Nigeria For Women Project Scale up (NFWP-SU) and its sub-projects. The process involves distinct steps and associated activities that are linked to deliver a robust and veritable management framework in line with the stated objectives of the ESMF.

#### **5.1 Sub-Project-Level Environmental and Social Reviews**

The application of this ESMF to the NFWP-SU sub-projects shall enable preparation of a standardized environmental and social assessment documents for appraisal and implementation. The environmental and social risks anticipated from the activities proposed under the different components of the NFWP-SU have been assessed in this section.

Annex 2 presents an Environmental & Social Screening checklist coherent with the Nigerian EIA Laws and World Bank environmental & social standards. Projects triggering significant environmental / social impacts, i.e. projects with potential to trigger impacts on environmental sensitive areas, or large-scale resettlement activities are not envisaged under NFWP-SU. This screening process will also involve the screening of Business Plan Assessments forms of potential beneficiaries for potential E&S impacts. A sample of the procedure for screening business plans is presented in Annex 17.

However, in the event of such projects being critical, the projects shall be included after undertaking the necessary environmental and social assessments, as mandated by the Environmental laws of Nigerian Governments (national and state) and complying with the Environmental & Social Framework standards of the World Bank. The process for ensuring conformity with these procedures is defined in this framework and the criteria established by using the checklist shall enable the identification of such projects.

The sub-project activities are expected to have generic environmental and social issues such as noise pollution, dust emission, labor issues, occupational and community health, and safety during the planned works will be minimal, site-specific, and easily manageable through standards and codes of practice (Annex 4 - Environmental, Health & Safety Guidelines, Annex 7 - Company Code of Conduct on preventing GBV, Annex 8 - Managers Code of Conduct Against preventing GBV, Annex 9 - Individuals Code of Conduct Against preventing of GBV, Annex 13 - Guidelines for preparation of a traffic management plan, Annex 14 - Outline of Security Management Protocol, Annex 15 - Environmental, Social, Health and Safety Requirements).

However, there will be project activities that may carry higher environmental and social disruptions risks and/or impacts. These subprojects should be the subjected to environment and/or social reviews as the key management tool for identifying opportunities for lower impact project opportunities (through an alternative analysis exercise whenever possible) and/or for the identification of necessary mitigation measures in accordance with the prevailing legal framework and the Bank's Environmental & Social Framework standards.

At the stage of detailed sub-project preparation, any significant environmental and social issues that may arise would be addressed and mitigated through an ESIA/ ESMP. The environmental management measures of the ESMP should be included as part of the specifications and codified in the bidding documents to ensure implementation.

All ESIA/ESMPs will be sent to the World Bank for review and clearance to ensure compliance with ESS1 and any other relevant policies, procedures and guidelines.

## **5.2 Potential Impacts Identification of the Proposed Project**

For the identification of potential impacts of sub-projects with significant environmental and social issues, the most useful tool for identifying, assessing, and managing the impacts of the NFWP-SU will be facilitated by undertaking an Environmental and Social Impact Assessment (ESIA) with rigorous scientific analysis and stakeholder engagement. This analysis may entail comprehensive baseline assessment based on standard scientific methods.

Consequently, the ESIA process will help identify the critical social and environmental issues associated with the NFWP-SU, then ensure that positive impacts are optimized, while the negative impacts are minimized or mitigated. The ESIA process will improve the understanding of the project by the local communities, and this will increase trust between the SPCUs and the local community. For completeness of the ESMF, a consultant will conduct an Environmental and Social Assessment to reflect potential impacts of proposed sub-projects under the NFWP-SU, however, it is imperative that a concise ESIA is conducted for each major development sub-project. The SPCU will need to conduct these studies before sub-projects are awarded.

## **5.3 Phases of the NFWP-SU Project**

For the purpose of this work, identified impacts that are likely to be associated with the NFWP-SU projects have been classified to occur in four (4) phases for the lifespan of the works. The phases include:

- Preparatory (pre-construction) phase
- Implementation (Construction) phase
- Operational/Maintenance phase
- Demobilisation phase

## **5.4 Type of Impacts and their Consideration as Perceived Under the NFWP-SU**

Even though most NFWP-SU project activities are expected to have environmental and social risks and impacts that are manageable through standards and codes of practice, there could be sub-project activities that carry a higher risk of environmental and social disruptions and/or impacts. These sub-projects should be the subject of environmental and/or social assessment as the key management tool for identifying opportunities for lowering negative impacts of the project (through an alternative analysis exercise whenever possible) and/or for the identification of necessary mitigation measures in accordance with the prevailing legal framework and the Bank's Environmental & Social Framework standards. Some of the potential positive and negative impacts are discussed in the subsequent sections.

### **5.4.1 Potential Positive Impacts**

The NFWP-SU project is envisaged to have a range of positive environmental and social impacts. The beneficial impacts associated with the project are presented in Table 15:

**Table 15: Potential Positive Impacts of the NFWP-SU Project**

<b>No.</b>	<b>Impact</b>	<b>Beneficiaries</b>	<b>Project Benefits</b>
1	The project will create an enabling environment to ensure the buy-in of key stakeholders and adequate support at the household level	Key stakeholders and beneficiaries of the projects	Will facilitate investments focused on women
2	The project will build capacity	Women Affinity Groups (WAGs)	Improvement in life skill development Financial literacy improvement skills Enterprise training

No.	Impact	Beneficiaries	Project Benefits
3.	Strengthening of economically active beneficiaries & target value chains	Women Affinity Groups (WAGs)	Livelihood grants and holistic as well as targeted skills trainings to include psycho-emotional entrepreneurship, market responsive technical skills, competencies, and life skills; based on sound analysis of the value chains and market demand.
4.	Transform women's social and livelihood outcomes	Women in target communities	Improvement in project delivery and overall impact, through support of innovations Improve standard of living of the rural women by enhancing their access to social and financial capital
5.	Stakeholders' engagement	State Government, LGAs	Improvement of public goodwill and satisfaction towards governance in States.
6.	Improvement in management of resources	Target Communities, State Government, MDAs	Provision of a lead way to drive the State Government towards ensuring improved development of women's livelihood outcomes
7.	Capacity building and strengthening of institutions	State Government, MDAs	Capacity building through: Strengthening of supervision systems of personnel involved in sub-project activities, including improvement in institutional responsibilities for construction and maintenance. Transfer of skills

Thus, interventions through NFWP-SU will, in general, provide real benefits to most, if not all, socioeconomic groups, including the poor by improving to the economy of the communities by creating direct and indirect employment, creating new sources of income and enhancing income from old sources.

#### **5.4.2 Potential Adverse Impacts**

Implementation of NFWP-SU could exert some negative impacts on the social and physical environment within the communities, in which they are implemented. The environmental & social risks of this project is considered Moderate from the livelihood strengthening activities (which could result in small-scale civil works) under Components 2 and 3 even though the components and subcomponents activities will not involve major construction works; and NFWP SU shall build on the parent project's E&S risk management experiences and lessons from several projects and programs within the country and globally. Consequently, the potentially significant adverse impacts that would result from the project are expected to be low to moderate in risk, site-specific, noncumulative, and relatively easy to mitigate to acceptable levels. The risks and impacts identified are:

##### **5.4.2.1 Environmental Impacts**

- **Air Pollution** – Includes the activities that promote the release or emission of gases that affect air quality and may be harmful to people & the environment.
- **Occupational Health & Safety** – The practices & measures undertaken to on the project that are involved with how activities are carried out in a way that it does not cause harm or injury to people.
- **Waste** – Including the waste generated by different activities of the subprojects such as organic waste & wastewater discharge from processing machinery, and how the waste is managed.
- **Climate Change** – includes all activities that may reduce or deepen climate change by influence on the carbon or water cycle.

- **Erosion** – these are the erosion events that occur or may be triggered to occur from the vulnerability of terrain to activities from the project.
- **Environmental Degradation & land use** – activities that are carried out on this project that will promote a decline in the natural environmental conditions.
- **Communicable diseases** – includes activities that may promote the transmission of communicable diseases, including COVID-19.
- **Security** – includes the activities that will be carried out in locations that present security challenges to the sub-projects.

#### **5.4.2.2 Social Impacts**

Social impacts can be subdivided into the following:

- **Demographic impacts** - such as displacement and relocation effects; and changes in population characteristics,
- **Socio-economic impacts** - including income and income multiplier effects, employment rates and patterns, effects on prices of local goods and services, and taxation effects,
- **Cultural impacts** - traditional patterns of life and work, family structures and leadership, religious and tribal factors, archaeological features, social networks and community cohesion,
- **Institutional impacts** - including demands on the government and social service, NGOs housing, schools, criminal justice, health, welfare and recreation, and
- **Gender impacts** - the implications of the sub-projects on the roles of women in society, income-generating opportunities, access to resources, employment opportunities and equity.

Analysis of social impact is a proactive approach carried out for better developmental outcomes, not just the identification or amelioration of negative or unintended outcomes but assisting communities and other stakeholders to identify goals and ensuring that positive outcomes are maximized. In the analysis of the social impacts, the following socio-cultural parameters shall also be considered:

- Quality of life,
- Social organisation and structures,
- Cultural life, including language, rituals and general lifestyle. A cultural life makes a social group immediately recognisable as being distinct from other groups, and
- Dispute-resolution institutions and processes; relationships between generations and value systems

#### **5.4.2.3 ESS2 Labor and Working Conditions**

The NFWP-SU may face an influx of non-local labor in some of the project sites from activities such as construction of small infrastructure (such as storage or drying facility). Under labor and working conditions, poor working environments, improper handling of workers' relations, misunderstanding of the rule of engagement for community workers, and use of child and forced labor by primary suppliers are likely risks, with a remote probability all these labor risks could materialize.

The project will take concrete measures to mitigate potential labor influx-related risks such as workers' sexual relations with minors and resulting pregnancies, presence of sex workers in the community, the spread of HIV/AIDS, sexual harassment of female employees, child labor and abuse, increased dropout rates from school, inadequate resettlement practices, and fear of retaliation, failure to ensure community participation, poor labor practice, and lack of road safety. These risks require careful consideration to improve social and environmental sustainability, resilience and social cohesion. Therefore, the project will include mitigation measures such as:

- (a) assessing living conditions of workers' camps and ensuring appropriate living conditions;
- (b) establishing and enforcing a mandatory Code of Conduct for the company, managers and workers, and an Action Plan for implementation;
- (c) ensuring appropriate location for these camps;
- (d) taking countermeasures - indicated in the Social Management Plan - to reduce the impact of the labor influx on the public services; and,
- (e) devising and implementing a strategy for maximizing employment opportunities for local population, including women.

The following guidelines lays out the principles that are key to properly assessing and managing the risks of adverse impacts on project area communities that may result from temporary NFWP-SU induced labor influx.

- The SPCU will encourage and superintend over contractors hiring, to the maximum extent, skilled and unskilled workers *from* affected communities in the project area. Selection criteria will also be properly defined and clearly stated in the contract bid documents.  
The SPCU will assess and manage labor influx risk based on appropriate instruments such as those based on risks identified in the ESIA, the LMP (Annex 11) and the Bank's sector-specific experience in the country. The LMP set out how project workers will be managed, in accordance with the requirements of national laws and ESS2. While the type and number of workers required under the project are not yet clear at this stage, it is expected that they will likely involve direct workers, contracted workers, primary supply workers, and community workers.
- Depending on the risk factors and their level, appropriate mitigation instruments need to be developed by the contractor such as a C-ESMP, Site-specific Labor Influx Management Plan and/or a Workers' Camp Management Plan<sup>14</sup>,
- Risk factors to the SPCU that should be considered, include,
  - Weak institutional capacity of the implementing agency;
  - Predominant presence of contractors without strong worker management and health and safety policies;
  - Anticipated high volumes of labor influx;
  - Pre-existing social conflicts or tensions;
  - Weak local law enforcement;
  - Prevalence of gender-based violence and social norms towards it in the community (acceptance of Gender Based Violence);
  - Prevalence of transactional sex;
  - Local prevalence of child and forced labor;
  - Existing conflict situation between communities;
  - Absorption capacity of workers to the community
- The SPCU will be required to incorporate social and environmental mitigation measures into the bid documents for and the civil works contract and responsibilities for managing these adverse impacts. This will be a binding contractual obligation on the SPCU, with appropriate mechanisms for addressing non-compliance.

The Supervision Consultant shall be responsible for monitoring the contractor performance and adherence to the labor influx guideline and that of its Sexual Exploitation and Abuse (SEA) obligations, with a protocol in place for immediate, timely, mandatory and confidential reporting in case of incidents to project community.

This allows the SPCU to enforce the implementation of such mitigation measures, which are required to ensure the consultant's own compliance with Bank policy requirements. While the Bank reviews and clears project-level E&S instruments such as the ESIA/ESMP, it is the SPCU's responsibility to: (i) ensure the E&S instruments are reflected in the contractor's ESMP (CESMP), and (ii) ensure the project is implemented in accordance with the CESMP, E&S instruments and other relevant contractual provisions.

#### **5.4.2.4 GBV Risk Management Mechanisms**

Key principle and specific requirements to address GBV/SEA shall be included in the bidding documents ('pre-qualification' and 'employers' requirements'). As such specific measures to reduce and mitigate the risk of GBV/SEA in the NFWP-SU project that are already in place from the first phase of this project and will contribute towards the effective operationalizing of these environmental and social guidelines are:

- i) GBV/SEA assessment of project;
- ii) mandatory contractors' code of conduct on sexual harassment;
- iii) appointment of NGO to monitor GBV/SEA in NFWP-SU;
- iv) community and workers' sensitization on GBV/SEA;
- v) provision of referral units for survivors of GBV/SEA;

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<sup>14</sup>A Labor Influx Management Plan addresses specific activities that will be undertaken to minimize the impact on the local community, including elements such as worker codes of conduct, training programs on HIV/AIDS, etc. A Workers' Camp Management Plan addresses specific aspects of the establishment and operation of workers' camps.



- vi) provisions in contracts for dedicated payments to contractors for GBV/SEA prevention activities against evidence of completion;
- vii) contractor and SPCU requirement to ensure a minimum target of female employment with incremental rewards of the obtainment of this target.

The following actions are also recommended for immediate implementation:

- Training & re-training of the GBV/SEA specialist by the NFWP-SU,
- Building and improving FPCU/SPCUs, local communities and other relevant stakeholders' capacities to address risks of GBV/SEA by developing and providing guidance, training, awareness, and dissemination of relevant GBV/SEA materials to communities,
- Developing a clear NFWP-SU specific internal "Reporting and Response Protocol" to guide relevant stakeholders in case of GBV/SEA incidents,
  - Strengthening operational processes of NFWP-SU participating States project area on GBV/SEA,
  - Identifying development partners and cultivating pragmatic partnership on GBV/SEA prevention measures and referral services,
  - Developing Codes of Conduct for civil works contractors with prohibitions against GBV/SEA,
  - Strengthening consultations and operationalizing GBV/SEA specific grievance redress mechanisms,
  - Providing financial support implementation of the GBV/SEA actions described herein, including training and awareness building for various stakeholders,
  - Establishing inter-ministerial committee to advance GBV/SEA actions described above.

Overall, GBV risks in the participating States might include Intimate Partner Violence (IPV), public harassment including harassment, verbal insults, physical abuse, rape, harmful widowhood practices and women and child trafficking. Targeted support to women under the program could likely exacerbate these risks. Development and implementation of specific GBV risk prevention and mitigation strategies, tailored to local contexts, will be critical. Guidelines for situation analysis of GBV and safe reporting guidelines in line with international best practices will be implemented.

#### 5.4.2.5 **ESS3 Resource Efficiency and Pollution Prevention and Management**

In implementing the NFWP-SU, the impacts considered under the ESS2 relate to effects of pollution on biological resources such as vegetation, wildlife, crops, and aquatic life. Impacts affecting soil and landforms, or vulnerability to soil erosion, floods and sedimentation, would be considered as physical impacts. Wastes could also be generated from the construction of small infrastructures and wastewater discharges from processing machinery. In addition, chemical impacts relate to sub-project activities that will cause a chemical change in air/water/soil quality. Smoke emitted from processing equipment, for example, may change the amount of sulphur dioxide (SO<sub>2</sub>) content of ambient air, while untreated effluent discharged directly into water bodies may change the chemical characteristics of the water bodies.

The biological component covers all elements, including different forms of plant life, their functions and interaction with other components of the ecosystem. Another component of a biological system is the animal life, which ranges from microscopic protozoans to large animals occupying different niches. In the planning process of the NFWP-SU, the consideration of under-listed four major points should be made to avoid or minimize the adverse impacts on biophysical components;

- All activities, which may affect the biophysical component of the sub-project area(s), should be carefully analysed and measures to mitigate adverse negative impacts should be implemented.
- Flora and economic plants should be protected and conserved.
- Keystone animals constitute important players in food chain, and may be endangered, rare, threatened, and endemic species, and form an important component of biodiversity. They should not be affected by the project activities. Measures to protect such animals and their habitat from any adverse impacts should be included in the development activity package, and

- Any activities, which affect bio/geo-chemical cycle within the ecosystem should be carefully analysed and efforts should be made to minimise the impacts through the implementation of appropriate measures.
- Activities related to pesticides (e.g. procurement of chemicals, pesticides, handling, application and disposal of pest control products) that could trigger OP 4.09, or new policies and or ES Standards, shall not be eligible for financing under the NFWP-SU.

#### **5.4.2.6 ESS4 Community Health and Safety**

The ESS4 is focused on assessment of community exposure to risks and impacts, in addition, communities that are already subjected to impacts from climate change may also experience an acceleration or intensification of impacts due to project activities. According to section 4.4.1 of this ESMF, Nigeria has ratified or acceded to the core international human rights treaties and is a party to the major regional human rights instrument which obliged States to respect, protect and fulfil human rights of all persons within the territory and subject to the jurisdiction of the State, without discrimination. Also, Nigeria has an obligation to take all appropriate measures to prevent rape, ensure that there are adequate sanctions for rape in law and in practice, and ensure access to reparation for the victims.<sup>15</sup> Furthermore, several human rights instruments<sup>16</sup> require Nigeria to take special measures to protect the rights of individuals who are vulnerable to sexual violence, namely women, children, and persons with disabilities.

The United Nations Special Rapporteur on violence against women has provided guidance on States' due diligence obligations in combating sexual violence, noting that it must be implemented at both individual and systemic levels. Individual due diligence focuses on the needs of individual survivors and "places an obligation on the State to assist victims in rebuilding their lives and moving forward," for instance through the provision of psychosocial services. Individual due diligence "requires States to punish not just the perpetrators, but also those who fail in their duty to respond to the violation."<sup>17</sup> As for systemic due diligence, it includes ensuring "a holistic and sustained model of prevention, protection, punishment and reparations for acts of violence against women. It is important to note that the NFWP (parent project) has conducted significant work on SEA/GBV risks and mitigation measures and the NFWP-SU will build on these pillars of progress. Therefore, this ESMF will require that the scale-up project will take advantage of the existing GBV Action Plan and Accountability Response Framework and practices under the parent project and make the required updates to align with ESF requirements and Bank directives - where necessary. The risk related to STD will be mitigated through proper sensitization and behavioral training.

In addressing the risks associated with security personnel, the Security Specialist engaged at the Federal level under the parent project shall continue to deliver these responsibilities:

- (a) identify Security and security risks and proffer solutions to them,
- (b) advise project management on all safety and security-related matters, ensuring the systemic application of safety and security management policies and procedures, and
- (c) train staff on security-related topics while ensuring those policy guidelines are understood, adopted, and implemented across the project States.

#### **5.4.2.7 ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

The NFWP-SU will not finance major land acquisition and livelihood disturbances but may require small land for small infrastructure to acquire higher-order economic assets, technology, machinery, and climate-smart investments and it is likely that small land may be required for storage facilities, drying yards, and high-volume weighing scales, for which the ESS5 will be applicable.

To address these risks, the ESS5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons. Project-related land acquisition or restrictions on land use may cause physical displacement

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<sup>15</sup> CEDAW art. 2(c), for example, provides that States must "establish legal protection of the rights of women on an equal basis with men and ensure through competent national tribunals and other public institutions the effective protection of women against any act of discrimination." The Maputo Protocol, art. 4, paras. 2(a) and (e), explicitly provides that laws prohibiting violence against women must be enforced and perpetrators held accountable; See also CEDAW general recommendation N.19 (n).

<sup>16</sup> CRC, CEDAW, CRPD, ACRWC, and the Maputo Protocol.

<sup>17</sup> Report of the Special Rapporteur on violence against women, its causes and consequences, para. 70, UN Doc. A/HRC/23/49 (14 May 2013)

(relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood), or both. The term "involuntary resettlement" refers to these impacts. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement.

1 "*Land acquisition*" refers to all methods of obtaining land for project purposes, which may include outright purchase, expropriation of property and acquisition of access rights, such as easements or rights of way. Land acquisition may also include:

(a) acquisition of unoccupied or unutilized land whether or not the landholder relies upon such land for income or livelihood purposes; (b) repossession of public land that is used or occupied by individuals or households; and (c) project impacts that result in land being submerged or otherwise rendered unusable or inaccessible. "Land" includes anything growing on or permanently affixed to land, such as crops, buildings and other improvements, and appurtenant water bodies.

2 "*Restrictions on land use*" refers to limitations or prohibitions on the use of agricultural, residential, commercial or other land that are directly introduced and put into effect as part of the project. These may include restrictions on access to legally designated parks and protected areas, restrictions on access to other common property resources, and restrictions on land use within utility easements or safety zones.

3 "*Livelihood*" refers to the full range of means that individuals, families and communities utilize to make a living, such as wage-based income, agriculture, fishing, foraging, other natural resource-based livelihoods, petty trade and bartering.

Experience and research indicate that physical and economic displacement, if unmitigated, may give rise to severe economic, social and environmental risks: production systems may be dismantled; people face impoverishment if their productive resources or other income sources are lost; people may be relocated to environments where their productive skills are less applicable and the competition for resources greater; community institutions and social networks may be weakened; kin groups may be dispersed; and cultural identity, traditional authority, and the potential for mutual help may be diminished or lost. For these reasons, involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it will be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented.

- To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives.
- To avoid forced eviction.
- To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by: (a) providing timely compensation for loss of assets at replacement cost and (b) assisting displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.
- To improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure.
- To conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable displaced persons to benefit directly from the project, as the nature of the project may warrant.
- To ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected.

A standalone Resettlement Framework that would guide the approach to managing impacts of this nature (physical & economic displacements), has been prepared separately to accompany this ESMF.

#### **5.4.2.8 ESS10 Stakeholder Engagement and Information Disclosure**

Stakeholder participation during project planning, design and implementation is widely recognized as an integral part of environmental and social management for projects. It will

be a two-way flow of information and dialogue between project proponents and stakeholders, which are specifically aimed at developing ideas that can help shape project design, resolve conflicts at an early stage, assist in implementing solutions and monitor ongoing activities. The stakeholder engagement plan is a separate standalone document that would guide the NFWP-SU in undertaking stakeholder engagements and shall also accompany this ESMF. Engage with all stakeholders throughout the project life cycle. The engagement shall commence during the project preparation process and must provide adequate time to allow meaningful participation and consultations with stakeholders on project design. The stakeholder process shall involve:

- Engaging with all stakeholders throughout the project life cycle. The engagement shall commence during the project preparation process and must provide adequate time to allow meaningful participation and consultations with stakeholders on project design.
- Provide all stakeholders with timely, relevant, understandable, and accessible information. It is vital that the project conducts its stakeholder engagement in a culturally appropriate manner, free of manipulation, interference, coercion, discrimination, and intimidation.
- Implement a stakeholder engagement process that includes the following important steps:
  - Stakeholder mapping
  - Stakeholder identification and analysis
  - Planning of stakeholder engagement methods
  - Disclosure of information
  - Consultation or engagement with stakeholders
  - Addressing and responding to stakeholder grievances & concerns

Regarding information disclosure, the NFWP-SU will publicly disclose this ESMF, and other ESF instruments such as ESIA/ESMP, RAP or ARAPs prepared in English and in the major local language (Ibo, Hausa, Yoruba & Efik Languages) in the different participating States. These instruments will be disclosed according to the methods provided in Table 23 and as may be required, copies will be made available and distributed with a letter accompanied to State governments concerned. This will be done by disclosure by EA Department, Federal Ministry of Environment and publishing it on the project's website;

In addition, NFWP-SU will ensure that the affected public is adequately sensitized through public meetings, notices, and handbills/information booklets. Once these E&S instruments are disclosed, the public has to be notified both through administrative structures and informal structures about the availability of the documents and also be requested to make their suggestions and comments. The complete approved E&S instruments will be made available in easily accessible locations in or near the implementing States. Once disclosed in Nigeria, the NFWP-SU will authorize the WB to disclose it on their external website.

Stakeholder consultations were conducted as part of the preparation of this ESMF with details provided in Chapter 10 (Table 23). This stakeholder engagement will remain on going throughout the entire lifecycle of the SU.

## **CHAPTER SIX**

### **ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK**

#### **6.0 Mitigation Measures**

The objective of the ESMF is to provide a framework for preventing and mitigating the negative impacts associated with the NFWP-SU. The sub-projects may have different levels of environmental and social impacts.

The mitigation principles are considered broadly as they capture all levels of impacts that each sub-project could present in the communities. These mitigation principles will also be useful and fundamental in the preparation of mitigation strategies which will be developed and implemented in the ESMPs prepared for sub-projects requiring ESIA.

The Environmental Management Framework institutionalizes the measures through assigning implementation responsibilities and formulation of contract clauses for incorporation into contract documents.

The anticipated risks from the different activities, corresponding predicted adverse impacts and the appropriate mitigation measures are as shown in Table 16.

**Table 16: Identified Impacts and Mitigation Measures**

Project Activity	Potential Impact source	Mitigation Measures	Roles and Responsibilities
<b>Preparatory (Pre-Construction) Phase</b>			
<p><b>Preparatory phase</b></p> <p><b>Preparatory activities for rehabilitation and civil works (such as vocational centers) &amp; for cultivation of agricultural farmlands</b></p>	<p><b>Land acquisition</b> from members of the communities prior to the preparatory phase.</p> <p><b>Cultural Practises</b> Bush clearing &amp; preparation for staging areas for agricultural farmlands</p> <p><b>Community Perception</b> Community involvement is useful at this stage. The members of the Community may have negative perception about the project if not properly managed.</p>	<ul style="list-style-type: none"> <li>• Undertake studies (ESMPs, ESIAAs) in accordance with provisions of ESS1 to establish site specific environmental and social assessment of interventions (investigate the water, soil &amp; air impacts)</li> <li>• Prepare ESMP that will guide against excessive removal of vegetation cover;</li> <li>• Minimize land clearing areas as much as possible to avoid unnecessary exposure of bare ground to the elements of the weather; Re-vegetate cleared areas as early as possible using native plant species</li> <li>• Contact local stakeholders in time to address and identify issues on land acquisition during this phase.</li> <li>• Ensure that adequate public notices are provided of planned activities. Implementation of ESS 10, stakeholder engagement.</li> <li>• RF /RAP activities should be implemented.</li> <li>• Development of project level grievance mechanisms to alleviate responses from affected communities.</li> <li>• Community involvement will be included through persuasion and provision of guidance if need be.</li> <li>• Adequate and timely information will be provided to affected owners.</li> </ul>	<ul style="list-style-type: none"> <li>• SPCU, MDAs (State Ministries of Information, Ministries of Human Capital Development, Ministries of Land, CBOs</li> <li>• RF Consultant, MDAs, CBOs, SPCU and FPCU</li> <li>• Social Officer of the FPCU and SPCU, MDAs (Ministries of Land, Ministries of Rural Development)</li> <li>• Social Officers of the FPCU and SPCU, CBOs</li> </ul> <p>FPCU, SPCU, MDAs (Ministry of lands, Ministry of Finance, Ministry of Urban and Rural Development) RF Consultant</p> <p>FPCU, SPCU, MDAs (Ministry of lands, Ministry of Agriculture, RF/RAP Consultant</p>

		<ul style="list-style-type: none"> <li>• Creating proper complaints procedure.</li> <li>• Providing for compensation on damage to property outside the actual project corridor. In the event that impacts occur on land outside that compensated for, compensation will be evaluated and settled as soon as it is reasonably possible after the damage is suffered.</li> <li>• Making sure the land acquisition activities adhere to provisions of ESS5 and that where possible, be scheduled with due regard for crop cycles to minimize unnecessary impacts on livelihoods and enable the continuation of economic agricultural activities.</li> </ul>	
<b>Preparatory activities for rehabilitation and civil works (such as vocational centers) &amp; for cultivation of agricultural farmlands</b>	<b>Climate Change</b> Exposure to climate risks such as windstorms, floods etc.	<ul style="list-style-type: none"> <li>• Conduct ESMP for site specific impacts that will incorporate adaptive operation and maintenance management approaches consistent with provisions in ESS4 that are aimed at scaling up climate resilience</li> </ul>	<ul style="list-style-type: none"> <li>• FPCU, SPCU, MDAs (Ministry of lands, Ministry of Finance, Ministry of Urban and Rural Development) RF Consultant</li> </ul>
	Secondary effects of climate change in the form of conflicts, clashes, and other criminal activities	<ul style="list-style-type: none"> <li>• Build climate resilience by creating awareness on climate change through community cohesion approach to livelihood restoration.</li> <li>• Introduce climate change co-benefits such as:</li> <li>• Recovering degraded areas for crop production through innovative management practices.</li> <li>• Introducing or expanding soil management practices that control soil erosion, nutrient loss and improve the water regime in the soil profile (e.g. conservation tillage).</li> <li>• Reducing vulnerability of crop storage facilities to climate change or climate variability using renewable energy and low carbon technologies</li> </ul>	
<b>Implementation (Construction) Phase</b>			
<b>NFWP-SU Infrastructure Rehabilitation activities of civil works (such as</b>	Poor or uncoordinated management of environmental and social issues	<ul style="list-style-type: none"> <li>• Develop and/or implement a proper Environmental &amp; Social Management Plan (ESMP) and Health &amp; Safety Plan (HSE)</li> <li>• Implement a capacity building or training for workers</li> </ul>	<ul style="list-style-type: none"> <li>• FPCU, SPCU, MDAs (Ministry of lands, Ministry of Finance, Ministry of Environment) ESIA/ ESMP Consultant</li> </ul>
	Poor compliance with effluent, emissions,	<ul style="list-style-type: none"> <li>• Develop and implement a healthcare waste management plan</li> </ul>	

<p><b>vocational centers) &amp; for cultivation of agricultural farmlands</b></p> <p>Environmental management plan and Health &amp; Safety planning</p>	<p>and noise standards. Ambient conditions exceed standards</p>	<ul style="list-style-type: none"> <li>Identify and empower focal persons responsible for Health, Safety &amp; Environment</li> <li>Identify, develop and implement action plan to address and correct deficiencies observed.</li> </ul>	
	<p>Absence or non-compliance with workplace standards on emissions, effluents etc.</p>	<ul style="list-style-type: none"> <li>Prepare monitoring plans</li> <li>Purchase or re-activate use of monitoring equipment</li> <li>Identify and empower persons responsible for managing of monitoring plan</li> </ul>	<ul style="list-style-type: none"> <li>FPCU, SPCU, MDAs (Ministry of lands, Ministry of Finance, Ministry of Environment)</li> </ul>
	<p>Workers are exposed to risks of accidents and incidents in operating of heavy-duty equipment for construction/rehabilitation work.</p>	<ul style="list-style-type: none"> <li>Prepare and enforce OHS standards according to ESS 2.</li> <li>Restrict access to users &amp; operators of equipment</li> <li>Post warning signs to notify persons of danger</li> <li>Ensure use of minimum PPE required for task</li> </ul>	<ul style="list-style-type: none"> <li>FPCU, SPCU, MDAs (Ministry of lands, Ministry of Finance, Ministry of Environment) ESIA/ ESMP Consultant</li> </ul>
	<p>Risk of generation of wastewater and non-efficient organic waste discharges</p>	<ul style="list-style-type: none"> <li>Prepare and enforce OHS standards according to ESS 2.</li> <li>Prepare &amp; enforce Waste Management Plans that would be site specific and in compliance with ESS3 requirements</li> </ul>	<ul style="list-style-type: none"> <li>FPCU, SPCU, MDAs (Ministry of lands, Ministry of Environment) ESIA/ ESMP Consultant</li> </ul>
	<p>Traffic safety Workers and public are exposed to risks associated with vehicular transport.</p>	<ul style="list-style-type: none"> <li>Prepare and implement a good traffic management plan in accordance with ESS4 provisions</li> <li>Information on road closure should be made publicly on local radio stations and television. Signage advising on closures and detours should be strategically placed along the roadsides.</li> <li>Ensuring that all road signs are put in place and detours made possible to divert traffic.</li> <li>Ensure alternative roads and footpaths</li> </ul>	<ul style="list-style-type: none"> <li>FPCU, SPCU, MDAs (Ministry of lands, Ministry of Finance, Ministry of Environment) ESIA/ ESMP Consultant</li> <li></li> </ul>
	<p>Workers are exposed to high noise levels, poor ventilation, poor lighting etc.</p>	<ul style="list-style-type: none"> <li>Correct conditions</li> <li>Enforce use of minimum PPE required for task</li> </ul>	<ul style="list-style-type: none"> <li>FPCU, SPCU, MDAs (Ministry of lands, Ministry of Finance, Ministry of Environment) ESIA/ ESMP Consultant, Safeguard Officers, Project Engineer, Ministry of Works</li> </ul>
<p>Public health risks Workers are exposed to public health risks from transmission of diseases</p>	<ul style="list-style-type: none"> <li>Ensure workers are informed of the public health risk according to ESS4 and provide procedures to prevent transmission</li> <li>Enforce compliance &amp; correct conditions</li> </ul>		



	<p><b>Accidents/incidents</b> Workers are exposed to risks of contamination from hazardous substances</p>	<ul style="list-style-type: none"> <li>Restrict access and provide Personal Protective Equipment (PPE)</li> </ul>	<ul style="list-style-type: none"> <li>FPCU, SPCU, MDAs (Ministry of lands, Ministry of Finance, Ministry of Environment) ESIA/ ESMP Consultant, Safeguard Officers, Project Engineer, Ministry of Works</li> </ul>
<p><b>NFWP-SU Infrastructure Rehabilitation activities of civil works (such as vocational centers) &amp; for cultivation of agricultural farmlands</b></p>	<p>Workers are exposed to hazardous contaminants in the workplace</p>	<ul style="list-style-type: none"> <li>Prepare and implement an IPMP in accordance with provisions of the ESS3 (resource efficiency and pollution prevention and management) a professional approach to hazardous materials management</li> <li>Ensure plan provides action of containment</li> <li>Provide frequent testing of water sources to ensure free of contaminants</li> </ul>	<ul style="list-style-type: none"> <li>FME, FPCU, SPCU and World Bank</li> </ul>
	<p>Risk of contamination of air, surface or groundwater</p>	<ul style="list-style-type: none"> <li>Undertake baseline studies</li> <li>Erosion control measures such as water bars, gabions, straw bales, and re-vegetation will be implemented during and after construction phases.</li> <li>Re-vegetation efforts will be implemented to ensure long-term recovery of the area and to prevent significant soil erosion problems.</li> </ul>	<ul style="list-style-type: none"> <li>SPCU and FPCU, MDAs (Ministries of Works, Ministries of Environment, Ministries, of Agriculture. Ministry of Works, ESMP Consultant.</li> </ul>
	<p><b>Cultural practises</b> Engaging in practises &amp; methods that encourage the release of harmful emissions</p>	<ul style="list-style-type: none"> <li>Introduce practices or techniques that reduce GHG emissions in crop production animal husbandry systems guided by the provisions of ESS3.</li> <li>Introduce practices or techniques to sequester CO<sub>2</sub> in agriculture.</li> <li>Popularize sustainable land and water management strategies that address land degradation and improve agro-ecological conditions.</li> <li>Integrated organic and inorganic nutrient management.</li> </ul>	<p>SNFWP-SU PCU Environmental Safeguard Officers, Project Engineer, Ministry of Works</p> <p>NFWP-SU-SPCU, Ministry of Works</p> <p>NFWP-SU-SPCU Environmental, Natural Resources Officers, Project Engineer, Ministry of Agriculture and Rural Development</p> <p>NFWP-SU-SPCU</p>

			NFWP-SU-SPCU, ESIA and RAP Consultants
	<p><b>Land use</b> Level of co-operation from community with regards to land acquisition for project activities and resettlement</p>	<ul style="list-style-type: none"> <li>Ensure that all necessary Environmental &amp; Social Framework standards such as the ESS5 (land acquisition, land use and Involuntary resettlement) and relevant legislation are used in addressing the issue of land use.</li> </ul>	<ul style="list-style-type: none"> <li>NFWP-SU FPCU and SPCU</li> </ul>
	<p><b>Transportation &amp; Traffic impact:</b> Existing travel patterns will be heavily impacted during the construction phase of the project in the States.</p>	<ul style="list-style-type: none"> <li>A good traffic management plan should be developed which will specify; safety rules on speed limits while driving, trainings to enable drivers to be responsive to local conditions, procedures for dealing with accidents involving injury to local people and livestock and restriction of heavy vehicle movements to specific access roads in compliance with ESS4.</li> </ul>	<ul style="list-style-type: none"> <li>NFWP-SU-PCU, Environmental Safeguard Officers, SNFWP-SU-PCU, Ministry of Works,</li> </ul>
<p><b>NFWP-SU Infrastructure Rehabilitation activities of civil works (such as vocational centers) &amp; for cultivation of agricultural farmlands</b></p>	<p>Occupational Health &amp; Safety PPEs, Emergency Response &amp; First Aids</p>	<ul style="list-style-type: none"> <li>The contractor will ensure that Personal Protective Equipment (PPE) are made available to all workers.</li> <li>The Contractor should ensure that necessary measures to avoid and minimize the negative health and safety impacts such as trainings for employees be established.</li> <li>Contractors should develop Occupational Health and Safety Systems (OHSMSs), which will include policies, plans, procedures, processes and programs according to the guidelines provided in annex 4 (Environmental, Health &amp; Safety Guidelines General Environmental Management Conditions for Maintenance/Maintenance Contracts) and annex 12 (Template for OHS Plan)</li> <li>Contractors should have standard operating practices for the following: <ul style="list-style-type: none"> <li>✓ Accident investigation and control</li> <li>✓ Hazards investigation and analysis</li> <li>✓ Hazard communication programme</li> <li>✓ Workplace violence</li> <li>✓ Work stress risk assessment/ work stress management plans</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>FPCU SU, NFWP-SU-SPCU, Ministry of Works, Ministry of Labour</li> </ul>

		<ul style="list-style-type: none"> <li>✓ Ergonomics</li> <li>✓ Heavy equipment safety</li> <li>✓ Fire and fuel safety</li> </ul> <ul style="list-style-type: none"> <li>• Implement generic dam safety measures for small dams.</li> <li>• Ensure that workers use protective gears during all working activities.</li> <li>• Proper disposal of construction spoil and any hazardous waste will be stored in areas clearly designated and labelled.</li> <li>• It will be very appropriate if a good health care unit is made available in the campsites.</li> <li>• First Aid Services should be provided at the campsites to provide immediate attention to accident victims before referring them to nearby clinics if need arises.</li> </ul>	
	<p><b>Land use</b>  <u>Impact Source:</u></p> <ul style="list-style-type: none"> <li>• Civil works.</li> <li>• Farming practices.</li> <li>• Livestock including overgrazing.</li> </ul>	<ul style="list-style-type: none"> <li>• Encouragement of early and on-going consultation within the local community.</li> <li>• Providing complimentary livelihood (promoting alternative means of income (which is sustainable and adaptable for each community)).</li> <li>• Improve roles of NGOs and Civil Society.</li> <li>• Ensures these exercises are conducted in environmentally sustainable manners</li> <li>• If land acquisition and/or land donation is involved, resettlement policy framework will be applied</li> </ul>	<ul style="list-style-type: none"> <li>• Environmental, Social and Natural Resources Officers of the FPCU SU, NFWP-SU-SPCU</li> </ul>
	<p><b>Air Quality</b>                  In establishing women's access to land and markets the roads are bound to be really busy and this will adversely affect the members of the community  <u>Impact Source:</u> Increase in the number of vehicles</p>	<ul style="list-style-type: none"> <li>• Ensure that the air quality levels are constantly monitored which can be obtained from relevant local air pollution control agencies/ metrology units in the States.</li> </ul>	<ul style="list-style-type: none"> <li>• Environmental Officers of the FPCU SU, NFWP-SU-SPCU, NESREA, Ministry of Agriculture and Rural Development</li> </ul>

	that ply the route of the 3 project areas.		
<b>NFWP-SU Infrastructure Rehabilitation activities of civil works (such as vocational centers) &amp; for cultivation of agricultural farmlands</b>	<b>Employment, Working Opportunities</b> Impact Source: <ul style="list-style-type: none"> <li>Demobilisation of the workforce.</li> <li>Improved accessibility</li> <li>Improved economic growth</li> </ul> Impact Indicator: <ul style="list-style-type: none"> <li>Presence of new small business enterprises</li> </ul> Improving economics of families	<ul style="list-style-type: none"> <li>Labour and employment practises will conform with the provisions in ESS2 (labour and working conditions)</li> <li>conduct a persuasive approach of community involvement, and proactively providing guidance to help maintain the road and bridges.</li> <li>Co-operating with the relevant departments to help in building economic centres such as marketplaces.</li> <li>Requesting the state and local governments to build feeder roads to connect the settlement areas with the road.</li> </ul>	<ul style="list-style-type: none"> <li>Environmental Safeguard Officers, FPCU SU, NFWP-SU-SPCU, Ministry of labour.</li> </ul>
	<b>Security risks</b>	<ul style="list-style-type: none"> <li>Conduct security risk assessment (SRA) of the participating States</li> <li>Prepare Security Management Plans (SMPs) that will provide measures for managing the security risks identified according to outline provided in annex 14.</li> </ul>	<ul style="list-style-type: none"> <li>FPCU SU, NFWP-SU-SPCU, Environmental Safeguard Officers</li> </ul>
	<b>Occupational Health &amp; Safety</b> a. PPEs b. Emergency Response & First Aids	<ul style="list-style-type: none"> <li>Development of inspection and maintenance programmes.</li> <li>Clearly mark road signs and hazards symbols within the location to minimise road accidents.</li> <li></li> </ul>	<ul style="list-style-type: none"> <li>FPCU SU, NFWP-SU-SPCU, Environmental Safeguard Officers, Natural Resources Officers, NESREA, Ministry of Labour, Ministry of Health</li> </ul>
<b>Social</b>			
	<b>Employment (Labour Influx)</b> The construction phase of the sub project and main project are bound to bring in both positive and negative impacts in the project areas.	<ul style="list-style-type: none"> <li>Implement the Labour Management Plan (LMP) in annex 11</li> <li>Labour and employment practises will conform with the provisions in ESS4 (community health &amp; safety)</li> <li>Ensure that individuals from project affected communities are employed as labourers and artisans.</li> </ul>	<ul style="list-style-type: none"> <li>FPCU SU, NFWP-SU-SPCU, Ministry of labour, Ministry of Works.</li> </ul>

	Employment discrimination	<ul style="list-style-type: none"> <li>Public consultation will be implemented to address any situation of wrong notion created by members of the communities.</li> <li>The campsite for workers should be located remotely away for the community.</li> <li>Contractors and Project managers should ensure that the workers are prohibited from patronising prostitutes and the use of alcohol and drugs within the site areas.</li> <li>Encourage contractors to provide opportunities for the vulnerable; women, youths and physically challenged in their secretariat or in administrative roles.</li> <li>Introduction SEA/SH measures, including codes of conduct for workers</li> </ul>	
	<b>Archeological &amp; Cultural loss</b> Graveyards and Sacred Areas (Graveyards, burial plots and sacred areas may be affected through physical intrusion)	<ul style="list-style-type: none"> <li>The Social Officer needs to ensure that thorough discussions are carried out during the Focus Group meeting addressing issues on Archaeology and cultural.</li> <li>Avoid disturbance by establishing history of sites considered from relevant govt. or village authorities</li> </ul> <p>For unavoidable impacts, the appropriate compensation measures will be applied as per the RF/RAP</p>	<ul style="list-style-type: none"> <li>Environmental, Social and Natural Resources Officers of the FPCU, NFWP-SU-SPCU, Ministry of Finance</li> </ul>
	<b>Social stress &amp; disruption</b> <u>Impact Source:</u> <ul style="list-style-type: none"> <li>Civil work activities.</li> <li>Human</li> <li>Governance. (Corrupt practices)</li> </ul>	<ul style="list-style-type: none"> <li>Root causes should be identified and addressed.</li> <li>Address governance and mobilize communities.</li> <li>Engage the private sector, and possibly introduce a market-based solution to take advantage of good Nigerian entrepreneurship and creativity.</li> </ul>	<ul style="list-style-type: none"> <li>Social Officers of the FPCU SU, NFWP-SU-SPCU, Ministry of Finance</li> </ul>
<b><u>Public Health/Community Health</u></b>  HIV/AIDS and STDs	<b>HIV/AIDS and STDs</b> <u>Impact Sources</u> <ul style="list-style-type: none"> <li>Influx of non-local workforce.</li> </ul>	<ul style="list-style-type: none"> <li>Effort will be made to enlighten the employees on HIV/AIDS and STD awareness programme in each of the project areas.</li> <li>Codes of conduct for addressing GBV related issues</li> <li>Effort will be made to enlighten the employees on COVID-19 awareness in each of the project areas and</li> </ul>	Environmental and Social Officers of the FPCU SU, NFWP-SU-SPCU, SMOE  Environmental Safeguard Officers of the FPCU SU, NFWP-SU-SPCU, SMOE

<p>Transmission of COVID-19</p> <p>Public Health/Water-Borne Diseases</p>	<ul style="list-style-type: none"> <li>Exploitative Sexual Behaviour</li> <li>Low living standards of members of the host community which will increase likelihood of social vices such as prostitution, robbery, etc.</li> </ul> <p><b>Public Health</b> Transmission of COVID-19</p>	<p>the protocols to prevent or reduce community transmission (guidelines provided in annex 6)</p> <ul style="list-style-type: none"> <li>Other activities will include treating other sexually transmitted diseases, distributing condoms, and providing counseling, screening, and support services for employees.</li> </ul>	
<p><b>Maintenance (Operations) Phase</b></p>			
<p>Farming &amp; processing of agricultural products</p>	<p><b>Generation of Waste</b> Inadequate solid waste management with abandoned equipment, removed spare parts, trash and waste around project area.</p>	<ul style="list-style-type: none"> <li>Ensure preparation &amp; implementation of composting in waste management plan;</li> <li>Monitor to ensure compliance with plan.</li> </ul>	<p>FPCU SU, NFWP-SU-SPCU, Environmental Safeguard Officers, Natural Resources Officers, Ministry of Environment, Department of veterinary services of Ministry of Agric</p>
	<p><b>Pests</b> Pest attacks on processed products</p>	<ul style="list-style-type: none"> <li>Implement the measures provided in the IPMP according to ESS3 guidelines (resource efficiency and pollution prevention and management)</li> <li>Ensure proper housekeeping is carried out in and around processing facilities or premises</li> </ul>	<p>FPCU SU, NFWP-SU-SPCU, Environmental Safeguard Officers, Ministry of Agric</p>
	<p>Occupational Health and Safety</p>	<ul style="list-style-type: none"> <li>Accidents from operation of machinery</li> <li>Incidents from use of agricultural tools</li> <li>Poor housekeeping around work site/farm sites that can promote accidents/incidents</li> </ul>	
<p><b>Cosmetic Making, Fertilizer or pesticide application</b></p>	<p>Use of hazardous Chemicals (for cosmetic making, agricultural activities) &amp; Pesticides.</p>	<ul style="list-style-type: none"> <li>Implement the use of the standalone NFWP-SU IPMP (annex 16) under the ESS3(Resource efficiency and pollution prevention and management) guidelines</li> </ul>	<p>FPCU SU, NFWP-SU-SPCU, Environmental Safeguard Officers, Ministry of Agric</p>

	Generation of waste and debris	<ul style="list-style-type: none"> <li>• Develop and implement a site-specific Waste Management Plan (WMP) to include the following:</li> <li>• Promote segregation of waste to facilitate reuse and recycling opportunities.</li> <li>• Conduct site visits at the completion of project to ensure no waste is left behind.</li> </ul>	FPCU SU, NFWP-SU-SPCU, Environmental Safeguard Officers
<b>Demobilisation Phase</b>			
<b>Decommissioning of dug out pits</b>	<b>Impact Source</b> Public health concerns from formation of stagnant pools for mosquito larvae breeding	<ul style="list-style-type: none"> <li>*Ensure filling out of all dugout pits to prevent water stagnation.</li> <li>*Ensure current system can handle improved drainage (prevent runoff erosion/ reservoir overflow)</li> <li>*Develop and implement plan to deal with impacts</li> </ul>	FPCU SU, NFWP-SU-SPCU, Social Safeguard Officers
<b>Demobilization of rehabilitation equipment &amp; facilities</b>	<b>Impact Source</b> Risks of occupational accidents and injuries to workers.	<ul style="list-style-type: none"> <li>• Develop &amp; implement a project specific Occupational Health and Safety Plan (OHSP) to include but not limited to:</li> <li>• Prohibition of drug and alcohol use by workers while on the job.</li> <li>• Provision of adequate first aid, first aiders, PPE, signage (English and Hausa languages).</li> <li>• Restriction of unauthorized access to all areas of high-risk activities.</li> <li>• Provision of specific personnel training on worksite OHS management</li> </ul>	FPCU SU, NFWP-SU-SPCU, Environmental Safeguard Officers

## **CHAPTER SEVEN**

### **PROJECT COORDINATION AND ESMF IMPLEMENTATION ARRANGEMENTS**

#### **7.0 Introduction**

It is necessary to highlight and define the roles, responsibilities and institutional arrangements for the implementation of the NFWP-SU, as they are vital to the effective implementation of the ESF standards compliance measures outlined in this ESMF. The institutional arrangements build on the NFWP and one of the major lessons learnt from this project is the lagging capacity at the Federal level to provide technical expertise and support to the State Implementing Units, and delays in approvals at the State level. This will be addressed under the scale up through the deployment of Technical Assistance to the Federal Project Coordination Units (FPCU) for project management, while at State level, the States will work through the multi-sectoral Coordination Structures to ensure the State leadership understands the aims and objectives of the project and give timely approvals. Accordingly, details of institution arrangements and the roles and responsibilities of the various institutions in the implementation of the ESMF are presented in this Chapter.

#### **7.1 NFWP-SU Institutional Arrangement**

Generally, the NFWP-SU project is expected to run at two levels, namely the Federal and State. At the Federal level, the Federal Project Management Unit (Federal NFWP-SU PCU or FPCU) supervised by the Federal Ministry of Environment will manage the Coordination and Program Support. The FPCU of NFWP will continue into the SU and will be responsible for coordination and support relationships with the State counterpart Agencies.

At the State level, the governments of the NFWP-SU States are expected to set up by State Law, agencies that would work in collaboration with the FPCU, though operating independently. Although, the Ministry of Finance, Budget and /Economic Planning, as the case may be in the various State is at present taking the lead in the financial coordination of the NFWP-SU preparatory programmes. States where the NFWP has already been implemented will continue under the SU, while SPCUs will be established for States that are just joining.

The law or legal agreement used in establishing the agencies will insulate the agencies and specifically the management unit from undue political or administrative interference. In addition, to implement the NFWP-SU program according to the agreed terms and conditions, a formal agreement is needed between the State Governments, the State Implementing Agencies (SPCUs) and other MDAs outlining the tasks, responsibilities, schedules, procedures, deliverables etc., required for preparation and implementation of the approved sub-projects.

The Project Coordination Unit (PCU) shall be headed by a Project Coordinator who will supervise activities of staff within three (3) major departments of the Agency, namely: Operations, Finance and Administration, and Monitoring & Evaluation (all three departments will cater for the environmental and social components/issues as concerns the NFWP-SU).

To capture the inflow and use of credit proceeds in a transparent manner through the Office of the Accountant General [Project Financial Management Unit (PFMU) set up for financial management of donor assisted projects at the state level], the State PCUs shall establish a relationship with PFMU.

This relationship would entail:

- A copy of the annual budget and work plan will be made available to the FPCU by the SPCU;
- PFMU internal auditors will be responsible for regular internal audit in the PCU and submit quarterly reports to the government (copied to IDA).
- A copy of monthly progress reports, quarterly reviews and Interim Financial Reports (IFRs) shall be sent regularly to the FPCU;
- The PFMU internal auditors shall participate in quarterly monitoring visits to communities as organized by the SPCU.



## **7.2 Roles and Responsibilities**

The successful implementation of the ESMF depends on the commitment of the sector and related institutions, and the capacity within the institutions to apply or use the ESMF effectively, and the appropriate and functional institutional arrangements, among others. Thus, details of institutional arrangements, the roles and responsibilities of the institutions that would be involved in the implementation of the ESMF are highlighted below. For the purpose of this ESMF, the institutions identified include;

- Federal Level Institutions: Federal Ministry of Women Affairs & Social Development, Federal Ministry of Environment and other relevant Ministries, Departments and Agencies (MDAs).
- Federal Project Management Unit (FPCU)
- State Level Institutions: State Ministry of Environment, SPCU and other relevant Ministries, Departments and Agencies (MDAs)
- State safeguard units
- Community Level and other Institutions
- Direct and Other Stakeholder/Groups: Community Project Management Committee (CPMC); CDA; CBO/NGOs
- Consultants, Contractors and Site Engineers
- World Bank and Other Development Partners

The roles and responsibilities of the above entities are discussed below:

### **7.2.1 Federal Level Institutions**

The institutions at the Federal level are responsible for the establishment of national policy goals and objectives and the appropriate provision of technical and financial assistance to State and local governments.

For this ESMF specifically, the Federal Ministry of Environment and the relevant agencies and Departments shall play the role of lead environmental regulator, overseeing compliance requirements, granting consent and also monitoring or providing supervisory oversight for the NFWP-SU projects. It also shall receive comments from stakeholders, public hearing of project proposals, and convening technical decision-making panel as well as provide approval and needed clearance for EA/EMP or other environmental clearance.

### **7.2.2 Federal Ministry of Women Affairs & Social Development (FMWASD)**

The Federal Ministry of Women Affairs & Social Development is mandated to advise the Federal & State governments on gender, children, aged and persons with disabilities related issues. To accomplish this goal, the ministry is responsible for initiating policy guidelines and lead the process of gender equality and mainstreaming at both the national and international levels.

### **7.2.3 Federal Ministry of Environment (FMEnv)**

The mandate of the Federal Ministry of Environment (FME), as defined by the Federal Republic of Nigeria is to ensure environmental protection and natural resources conservation for a sustainable development in the country. They promote cooperation in environmental science and conservation technology with similar bodies in other countries and with international bodies connected with the protection of the environment and the conservation of natural resources. The Ministry also cooperates with Federal and State Ministries, Local Government, statutory bodies and research agencies on matters and facilities relating to the protection of the environment and the conservation of natural resources.

#### **7.2.3.1 Department of Environmental Assessment**

The Department is the lead agency at the federal level for the operationalizing of the ESMF on this project. The department is ultimately responsible for monitoring, assessing, mapping, inventory and generation of baseline environment data for the prevention, mitigation and control of hydro- meteorological related disasters in Nigeria. Formulation of resettlement strategies, emergency preparedness plans, and environmental & social aspects of infrastructural development in the country in cooperation with other related agencies.

#### **7.2.4 National Environmental Standards and Regulatory Enforcement Agency (NESREA)**

The agency is chiefly responsible for the protection and development of the environmental, biodiversity conservation and sustainable development of Nigeria's natural resources in

general and environmental technology including liaison with relevant stakeholders within and outside Nigeria on matter of enforcement of environmental standards, regulations, rules, laws, policies and guidelines. The E&S responsibilities for the NFWP-SU are highlighted in the Table 17.

**Table 17: Environmental & Social management Responsibilities for NFWP-SU**

<b>S/No</b>	<b>Category</b>	<b>Roles</b>
<b>I</b>	<b>Federal Government MDAs (Federal Ministry of Environment and her agencies (Such as NESREA)</b>	Lead role -provision of advice on screening, scoping, review of draft RAP/EA report (in liaison with State Ministry of Environment), receiving comments from stakeholders, public hearing of the project proposals, and convening a technical decision-making panel, Project categorization for EA, Applicable standards, Environmental and social liability investigations, Monitoring and evaluation process and criteria
	<b>Federal Ministry of Women Affairs &amp; Social Development (FMWASD)</b>	Provide leadership in the policy direction of the NFWP-SU project and ensure that all the necessary E&S studies are conducted and disclosed. Coordinate with the World Bank, FMEnv and other stakeholders to ensure that all statutory obligations are sustained in the execution of project.
<b>II</b>	<b>State PCUs</b>	Ensuring approval of fund for Environmental and Social E&S compliance unit and M&E implementation and monitoring functions; Ensure that the ESIA/ESMP is disclosed to the public Responsible for coordination to ensure that parties to implementation carry out their responsibilities as and when due. Ensure that World Bank E&S standards compliance policies and country standards are adhered to by contractor and workers through supervision and funding of mitigation measures/ESMP  Ensure that the activities of the admitted projects NSHIP, CSDP, FADAMA and SEPIP are in compliance with the ESMF provisions and guidelines.
<b>III</b>	<b>Environmental &amp; Social Safeguard Units in the SPCUs</b>	Environmental E&S standards compliance Officer Carry out supervision functions during construction to ensure that contractor and workers adhere to mitigation measures in the ESMP; Collate environmental baseline data on relevant environmental characteristics for monitoring and auditing Ensure that project activities are implemented in accordance with good practices and guidelines set out in the site specific ESMP; Identify and liaise with all stakeholders involved in environment related issues in the project; and be responsible for the overall monitoring of mitigation measures and the impacts of the project during implementation. E&S standards compliance Coordinate and ensures the implementation of the social aspects of the ESMP Identify and liaise with all stakeholders involved in social related issues in the project; Conduct impact evaluation and beneficiary's assessment; and Establish partnerships & liaise with organizations, Community Based Organizations (CBOs), Civil Society Organizations (CSOs).
<b>IV</b>	<b>State Government MDAs (Ministry of Lands, Survey and Urban Development</b>	Compliance overseer at State Level, on matters of Land Acquisition and compensation and other resettlement issues
<b>V</b>	<b>State Government MDAs - Ministry of Environment, etc.</b>	Lead role -provision of advice on screening, scoping, review of draft RAP/EA report (in liaison with Federal Ministry of Environment), receiving comments from stakeholders, public

		hearing of the project proposals, and convening a technical decision-making panel, Monitoring and evaluation process and criteria.
	<b>Other MDAs</b>	The MDAs applies when relevant areas or resources under their jurisdiction are likely to be affected by or implicated sub-projects. They participate in the EA processes and in project decision-making that helps prevent or minimize impacts and to mitigate them. These institutions may also be required, issue a consent or approval for an aspect of a project; allow an area to be included in a project; or allow impact to a certain extent or impose restrictions or conditions, monitoring responsibility or supervisory oversight.
<b>VI</b>	<b>World Bank</b>	Assess implementation Recommend additional measures for strengthening the management framework and implementation performance.
<b>VII</b>	<b>NFWP-SU FPCU E&amp;S compliance unit (SU)</b>	Liaise closely with Ministry of Environment in preparing a coordinated response on the environmental and social aspects of project development. Ensure compliance with statutory requirements. Provides technical guidance on ESMP/RAP implementation. Liaise between SPCU and World Bank for effective coordination of NFWP-SU projects
<b>VIII</b>	<b>Local Government</b>	Liaising with the SPCU to verify adequacy of resettlement location and provide approval for such sites, providing additional resettlement area if the designated locations are not adequate, Provide necessary infrastructures in relocated areas, engage and encourage carrying out comprehensive and practical awareness campaign for the proposed sub-projects, amongst the various relevant grass roots interest groups.
<b>IX</b>	<b>CDA (Community Development Associations)</b>	Ensure Community participation by mobilizing, sensitizing community members;
	<b>Consultants, Contractors, and Site Engineers</b>	Will work with the PCUs at Federal and State levels, and other stakeholders. They are to ensure effective project delivery in a timely, safe and environmentally sound manner.
<b>X</b>	<b>NGOs/CSOs</b>	Assisting in their respective ways to ensure effective response actions, Conducting scientific researches alongside government groups to evolve and devise sustainable environmental strategies and rehabilitation techniques, Organizing, coordinating and ensuring safe use of volunteers in a response action, and actually identifying where these volunteers can best render services effectively & Providing wide support assistance helpful in management planning, institutional/governance issues and other livelihood related matter, Project impacts and mitigation measure, Awareness campaigns
<b>XI</b>	<b>The General Public</b>	Same as above

The other institutions, on the other hand, come in as and when relevant areas or resources under their jurisdiction or management are likely to be affected by or implicated in the execution of the project. These institutions are grouped broadly into two – resource-based ones and the utility service providers. They all have a significant role and are consulted as appropriate. They participate in the EIA processes and in project decision-making that helps prevent or minimize impacts and to mitigate them. These institutions may also be required:

- To issue a consent or approval for an aspect of a sub- project;
- To allow impact to a certain extent or impose restrictions or conditions.

Furthermore, the institutions may have monitoring responsibility or supervisory oversight during in an area of concern or interest to them during implementation.

#### **7.2.4 State Level Institutions**

These are the State level institutions include the SPCUs and other relevant Ministries, Departments and Agencies (MDAs). Some relevant agencies include:

#### **7.2.4.1 State Environmental Protections Agencies/Authorities (SEPAs)**

Most States have set up Environmental Protection agencies as the regulatory body to protect and manage the environmental issues in their domain. The functions of the SEPAs include:

- Enforcement of all environmental legislations in the States
- Minimization of impacts of physical development on the ecosystem
- Preservation, conservation and restoration to pre-impact status of all ecological process essential for the preservation of biological diversity.
- Protection of air, water, land, forest and wildlife within the state.
- Pollution control and environmental health in the State.

#### **7.2.4.2 State Ministry of Lands**

The major function of the Ministry of Land is to ensure that there is optimal utilization of land resources in their States in order to achieve development. For the NFWP-SU purpose, the State Ministry of land will provide a suitable approach in acquiring land from the members of the community for the purpose for the work and this would be guided by the provisions in ESS5/RF.

#### **7.2.4.3 State Ministry of Information and Communications**

The State Ministry of Information and Communication will be responsible for dissemination of information that will enhance and facilitate project understanding and acceptance at the level of the state. It will have an idea on the language of the community members and the culture of its indigenous people. The ministry will utilize the use of radios, television media, public awareness campaigns and jingles; going into the communities and informing the people and other communication media to educate the community members on the importance of the NFWP-SU in their community. This ministry will play a vital role in community involvement mechanism.

#### **7.2.4.4 State Agencies/Project Coordination Unit (SA/PCU)**

The SA/PCU, as the implementing authority, has the mandate to:

- Co-ordinate all policies, programmes and actions of all related agencies in the States
- Ensure the smooth and efficient implementation of the project's various technical programmes
- Ensure the compliance of PCU with ESF standards, especially ESS10 (stakeholder engagement & information disclosure)
- Cooperate through a Steering Committee that provides guidance to the technical aspects of all project activities;
- Maintain and manage all funds effectively and efficiently for the sub-projects
- Plan, coordinate, manage and develop NFWP-SU projects to ensure success.
- Coordinate activities of the State Licensing Authority and all vehicle inspection units.
- Recommend on policy issues to the Governor including mechanisms for implementation.
- Prepare plans for the management and development of NFWP-SU project.
- Facilitate the discussion between PAPs and communities regarding implementation of the subprojects;
- Monitor the project work to ensure that the activities are carried out in a satisfactory manner;
- Ensure that progress reports are submitted to the World Bank regularly

#### **7.2.4.5 PCU Safeguard Units**

To ensure sustainability in all the NFWP-SU projects, an Environmental/Social E&S compliance unit that reports directly to the Project Coordinator shall exist. The paramount objective of the Environmental/Social E&S compliance unit is to ensure the effective consideration and management of environmental/social concerns in all aspects of NFWP-SU project, from the design, planning, implementation, monitoring and evaluation of initiatives in the various States. Thus, a key function of the Unit is to engender a broad consensus, through participatory methods and extensive dialogue with affected and interested parties, on fair and adequate methods by which rights of way can be cleared of occupants as needed, taking account of international standards for involuntary displacement as incorporated into the World Bank's ESS5 on land acquisition, restriction on land use & involuntary Resettlement and environmental compliance with the EA.

With this, particular attention is directed at minimizing environmental/social risks associated with the development of sub-project initiatives, as well as the identification and maximization of social development opportunities arising from investments.

In the implementation of the NFWP-SU, the Safeguard Unit will be expected to advise on the environmental and social costs/benefits of the different options and audit E&S standards compliance of sub-projects. The PCU E&S compliance unit will function as an independent unit. For all environmental and social issues, the Safeguard Unit shall work to closely with other relevant MDAs in preparing a coordinated response on the environmental and social aspects of the NFWP-SU sub-projects. In order to achieve this made, the SPCUs would have in each State a Steering Committee (Board) and a Project Implementation Unit (PIU) for coordinating the day to day activities with the relevant line departments.

Two members of the different SPCUs will be designated as Environmental & Social Officers to oversee the implementation of Safeguard instrument for the ESMF and the RF as well as any other environmental and social provisions as deemed fit for project implementation as per the regulations of the World Bank and Government of Nigeria and the respective State government. The roles and responsibilities of the Safeguard Specialists (Environmental and Social Officers to anchor environmental and social issues distinctively) are described as follows:

#### **7.2.4.5.1 Roles & Responsibilities of Environmental Safeguard Specialist**

- Review all EA Documents prepared by consultants and ensure adequacy under the World Bank Environmental & Social Framework standards including the ESS 1 (Assessment & management of E&S risks and impacts) and ESS4 (community health & safety).
- Ensure that the project design and specifications adequately reflect the recommendations of the ESIA/ESMP/RAP/ARAP
- Co-ordinate application, follow up processing and obtain requisite clearances required for the project, if required
- Prepare compliance reports with statutory requirements.
- Develop, organize and deliver training programme for the PCU staff, the contractors and others involved in the project implementation, in collaboration with the SPCUs.
- Review and approve the Contractor's Implementation Plan for the environmental measures, as per the ESIA and any other supplementary environmental studies that may need to be carried out by the PCU
- Liaise with the Contractors and the PCU / State Implementing agency on implementation of the ESIA/ESMP/RAP/ARAP
- Liaise with various Central and State Government agencies on environmental and other regulatory matters
- Continuously interact with the NGOs and Community groups that would be involved in the project
- Establish dialogue with the affected communities and ensure that the environmental concerns and suggestions are incorporated and implemented in the project
- Review the performance of the project through an assessment of the periodic environmental monitoring reports; provide a summary of the same to the Project Manager, and initiate necessary follow-up actions
- Provide support and assistance to the Government Agencies and the World Bank to supervise the implementation

#### **7.2.4.5.2 Roles & Responsibilities of Social Safeguard Specialist**

- Review all SA Documents prepared by consultants and ensure adequacy under the World Bank Environmental & Social Framework standards including the ESS 1 (Assessment & management of E&S risks and impacts) and ESS5 (land acquisition, restrictions on land use and involuntary resettlement)
- Ensure that the project design and specifications adequately reflect the recommendations of the ESIA/ESMP/RAP/ARAP
- Co-ordinate application, follow up processing and obtain requisite clearances required for the project, if required
- Prepare compliance reports with statutory requirements.
- Develop, organize and deliver training programme for the PCU staff, the contractors and others involved in the project implementation, in collaboration with the SPCUs.
- Review and approve the Contractor's Implementation Plan for the social measures, contained in ESIA/ESMP or A/RAP and any other supplementary studies that may need to be carried out by the PCU
- Liaise with the Contractors and the PCU / State Implementing agency on implementation of the ESIA/ESMP/RAP/ARAP.

- Liaise with various Central and State Government agencies on resettlement and other regulatory matters
- Continuously interact with the NGOs and Community groups that would be involved in the project
- Establish dialogue with the affected communities and ensure that the social concerns and suggestions are incorporated and implemented in the project
- Review the performance of the project through an assessment of the periodic social monitoring reports; provide a summary of the same to the Project Manager, and initiate necessary follow-up actions
- Provide support and assistance to the Government Agencies and the World Bank to supervise the implementation

### **7.3. Local Government Level Institutions**

The Local Government has become accepted as the government nearest to the people or the masses. For any meaningful development to take place, this level of government needs to be galvanized, to execute people-oriented programs, which seek to lower poverty level as is designed in NFWP-SU. The LG governs the affairs in the various communities. It is expected that it serves as an inter-phase between the community members and the State NFWP-SU PCUs. The LG can assist in the implementation of the proper community mechanism. Members of the local government are mostly people from the community and can easily win the trust of the people. Their staff can work together with the other MDAs and CBOs.

The Local Government Councils in the new participating States have to be fully briefed and enlightened in the process and steps to be taken in the ESMF/EA/ESMP and the overall project execution. The Council should in turn engage and should be encouraged to carry out a comprehensive and practical awareness campaign for the proposed NFWP-SU's-AF, amongst the various relevant grass roots interest groups.

### **7.4 Community Level and other Institutions**

This includes direct and other concerned stakeholders/groups. This may have complaints/views that need to be resolved in the choosing and execution of the various sub-projects. It is obvious that villages and youth leaders shall ensure that social values are not interfered with.

### **7.5 Community Based Organizations (CBO)**

These are organizations based in the communities. Organizations in the community can serve as an inter-phase and can speak for the people. They can communicate to the State NFWP-SU PCUs, the intentions and needs of the people and vice versa during the proposed NFWP-SU.

### **7.6 World Bank**

The World Bank will assess the implementation of the updated ESMF and recommend additional measures for strengthening the management framework and implementation performance, where need be. The reporting framework, screening procedures and preparation of management and mitigation plans shall be discussed and agreed by the Bank team and SPCU during the project's AF implementation.

### **7.7 Consultants, Contractors and Site Engineers**

The Consultant and Contractor will work with the SPCUs and other stakeholders in prompt and effective project delivery.

## **CHAPTER EIGHT**

### **GREIVANCE REDRESS MECHANISM (GRM)**

#### **8.0 Introduction**

To ensure social accountability, inclusion, sustainability and transparency in the implementation activities, the NFWP established a mechanism to receive and act on complains and grievances by beneficiaries, stakeholders or project affected persons (PAPS) against activities being conducted by the Project in the State. This mechanism will remain operational under the SU and disputes or complaints from land Acquisition, Restrictions on Land Use and Involuntary Resettlement resulting from the implementation have been addressed under the GRM prepared in the RF (Chapter 7), while employment and labour related complaints have been addressed by the LMP (Chapter 7), complaints arising from delay in civil works, conflict between construction workers and community members, unmanaged expectations or lack of information about the project are addressed here.

#### **8.1 Objectives of the GRM**

The fundamental objectives of the GRM, implemented through the GRC serving as a para-legal body, are to resolve any resettlement-related grievances locally in consultation with the aggrieved party to facilitate smooth implementation of the social and environmental action plans. Another important objective is to democratize the development process at the local level and to establish accountability to the affected people. In other words, the grievance mechanisms:

- a. Provide a way to reduce risk for projects.
- b. Provide an effective avenue for expressing concerns and achieving remedies for communities and promote a mutually constructive relationship.
- c. Prevent and address community concerns and assist larger processes that create positive social change.

#### **8.3 Importance of NFWP GRM**

The establishment of a GRM is beneficial for organizational and Project strengthening. Grievances should be seen as a gift and not a threat to the Project. Grievances submitted are a source of valuable information that can help to strengthen the implementation of the Project and provide support and protection to Project beneficiaries. NFWP's ability to resolve grievances demonstrates transparency and accountability to beneficiaries and non-beneficiaries.

Anyone can raise a grievance about NFWP. Beneficiaries and non-beneficiaries are all welcome to submit complaints on any aspect of NFWP via any of the available grievance channels (e.g. in-person to staff or volunteers or by phone, letter, email, or social media).

#### **8.4 Structure for managing grievances and Staff responsible**

The following can receive grievances from complainants under the NFWP GRM:

1. Grievance Volunteers and Ward Facilitators\* (at community the level)
2. LGA Field Supervisors (LFS) and WAG Support Officers (at LGA level)
3. SPCU GRM Focal Points - specifically the Social Safeguards and Environmental Safeguards Anchors and Advisers (at State the level)
4. FPCU GRM Focal Points - specifically the Social Safeguards and Environmental Safeguards Anchors and Advisers (at Federal the level)

#### **8.5 Pathway for submission of grievances**

At the LGA, State, and Federal levels, the following complaint pathways under the NFWP will also be in use under the SU:

1. **LFSs / WSOs:** Complaints can be made through the LFSs or WSOs in person or in writing. They are also responsible for reviewing any complaints relating to their LGA received via any channel. They are effectively trained on project activities to collate and address grievances, channeling them as necessary to the SPCU GRM FPs.
2. **SPCU GRM FPs:** Grievances can be made at the state offices either in person, via telephone, in writing, or through any other accessible channel as there are SPCU GRM FPs that have been trained on effectively handling and managing grievances. Telephone numbers for State hotlines will be displayed at various state and local government offices and in Project communities.

3. **FPCU GRM FPs:** At the FPCU level, there are GRM FPs who have been trained on handling and managing grievances and they can receive and register grievances from beneficiaries and non-beneficiaries using any channel convenient for them. Grievances may come in via hotline, in writing, in person, or via social media. The different categories of grievances under the NFWP are presented in Table 18.

**Table 18: Categorise of Grievances under NFWP**

<b>CATEGORIES</b>	<b>CATEGORIES OF GRIEVANCES UNDER NFWP PROJECTS</b>	<b>RESPONSIBILITIES</b>	<b>RESPONSE TIME FOR FURTHER ACTION</b>
<b>CATEGORY 1</b>	<b>WRONGFUL INCLUSION/EXCLUSION</b> <ul style="list-style-type: none"> <li>• WAG - Wrongful inclusion</li> <li>• WAG - Wrongful exclusion</li> <li>• Livelihood grants – wrongful inclusion</li> <li>• Livelihood grants – wrongful exclusion</li> </ul>	LFS	21 Days To 1 Month
<b>CATEGORY 2</b>	<b>PAYMENTS</b> <ul style="list-style-type: none"> <li>• Delay in payment</li> <li>• Incorrect payment amount</li> </ul>	LFS, SPCU FP, SPCU accounting	Within 7 Days
<b>CATEGORY 3</b>	<b>SERVICE DELIVERY ISSUES</b> <ul style="list-style-type: none"> <li>• Mistreatment/rudeness by staff</li> <li>• Complaints not responded to</li> <li>• Wrong information / poor communication</li> <li>• Other Service Delivery Issues</li> </ul>	State- or Federal-level GRM FPs, SPCU or FPCU Coordinator	Within 7 Days
<b>CATEGORY 4</b>	<b>FRAUD AND CORRUPTION ISSUES</b> <ul style="list-style-type: none"> <li>• Bribe and Extortion</li> <li>• Misappropriation / Theft</li> </ul>	SPCU/FPCU GRM FPs, SPCU Coordinator, NPC	21 Days or More
<b>CATEGORY 5</b>	<b>INQUIRIES AND INFORMATION REQUESTS</b>	All GRM FPs	Within 7 Days
<b>CATEGORY 6</b>	<b>OTHERS</b>	LFS	7 To 14 Days
<b>CATEGORY 7</b>	<b>GENDER-BASED VIOLENCE</b> <ul style="list-style-type: none"> <li>• Sexual exploitation and abuse (SEA) or sexual harassment (SH) (e.g. staff or contractor inflicting SEA/SH on a beneficiary, community member, or other staff members)</li> <li>• Other forms of GBV (not SEA/SH), e.g., IPV and domestic conflicts (e.g. between project beneficiaries or community members - not involving staff or contractors)</li> </ul>	LFS and SPCU GRM FPs, Gender/GBV Anchors and Advisers are responsible for ensuring GBV-related complaints are treated according to the NFWP GBV Accountability Response Framework. The survivor/complainant maintains the right to choose whether further action should be taken on their complaint. They also have the right to change their mind and stop seeking resolution of their complaint.	As soon as the incident becomes known refer using the referral directory. If the perpetrator is associated with the project and the survivor wants to proceed with the case the GRM FP should notify the SPCU GRM FP/SPCU Coordinator

### **8.6 Addressing complaints related to GBV and SEA/SH**

The NFWP GRM takes complaints related to gender-based violence (GBV) and sexual exploitation or abuse / sexual harassment seriously. A separate GBV accountability and Response Framework have been prepared to address GBV allegations and to hold perpetrators accountable. However, for any complaint that is reported to the GRM (including



complaints involving other forms of GBV that are not related to the project), the GRM will also have procedures in place to refer the individual to GBV service providers.

The NFWP-SU will build upon the use of the uptake channel for resolution of GBV complaints established under the NFWP, as follows:

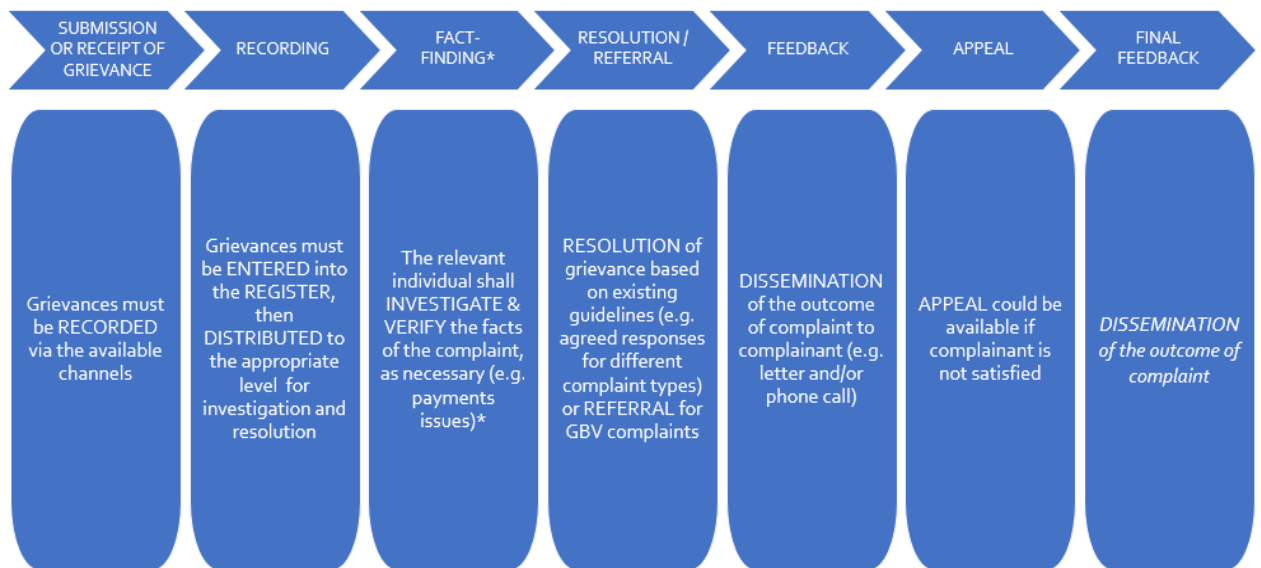
a. **GBV-GRM Committee:** The committee’s primary role is to confirm if allegations are related to the project, enforce Accountability Measures by assessing and responding to allegations in line with established protocols, and ensures that CoCs are enforced. The Committee is made up of 6 key persons in each NFWP state; National Project Coordinator (NPC), State Project Coordinator (SPC), Federal Head of Operations (HOP), State Head of Operations (HOP), GBV Federal Advisor and State Advisors.

b. **Grievance Channels:** GBV-related complaints for the NFWP SU will be made using all of the project’s grievance channels:

- State and Federal Toll-free lines
- In-person complaints are made to Ward Facilitators, Local Government Field Supervisors, WAG Support Officers and Gender/GBV/Safeguards Anchors and Advisors at the State and National level. All will be trained on how to receive cases in a survivor-centred way and on the referral pathways. However, GBV incidence or allegations can be disclosed via any source depending on whom the survivor deems fit to report to.
- WhatsApp and Text messages to GBV Advisors and Anchors, Local Government Field Supervisors and WAG Support Officers.

### 8.6.1 Handling Grievances

The following are basic processes to be followed in handling grievances is presented in the flowchart in Figure 6.



\*There is no investigation for GBV complaints – these should be referred via the appropriate referral pathway if the complainant so desires.

**Figure 6: Grievance Redress Flowchart**

### 8.7 Service Standards for NFWP GRM

- NFWP SU will ensure that all grievances are handled and resolved within the specified time frame depending on the category of complaint. The maximum time frame for resolving categories of issues that are within the remit of NFWP will be 3 months (90 days).
- NFWP SU will ensure that feedback is provided to complainants on the status of their grievances within 28 working days from the time the complaint was first received.
- Where investigations are likely to take more than 7 days, NFWP will provide complainants with a progress update.
- NFWP SU will guarantee that all complainants are treated with respect and fairness.

- NFWP will ensure that persons with disabilities and other vulnerable groups can easily access the GRM using available channels for registering complaints.
- NFWP will ensure that GBV and SEA/SH complaints are treated appropriately following a survivor-centered approach.

## **8.8 Guiding Principles**

To effectively manage grievances, there are basic principles that must be followed to ensure that the grievance redress mechanism is effective and valuable to beneficiaries and non-beneficiaries. The key principles include the following:

### **I. Communicated and Visible**

A good grievance mechanism should be clearly communicated to all relevant stakeholders (beneficiaries, the general public, and others). Information on how to channel grievances should be clear and widely publicized. Beneficiaries and non-beneficiaries should be informed on the timelines and the necessary steps that will be taken in handling their grievances. Information on what type of grievances can be made should also be clearly communicated to the beneficiaries, staff, and any other interested party. In the case of NFWP the Ward Facilitators (WFs), WAG Support Officers (WSOs), and LGA Field Supervisors (LFSs) are the frontline staff who engage directly with citizens hence should be well knowledgeable on how the GRM operates.

### **II. Accessible**

An effective GRM should be easily accessible by all. It should offer multiple channels for receiving and responding to grievances (e.g. in person, by phone, in writing, etc.). The conditions of the beneficiaries and other interested citizens should be taken into account when establishing a GRM. For example, if the GRM has a hotline element and there are beneficiaries with no phones, the grievance handling process should offer other alternatives such as face to face interaction or writing letters as alternatives for channeling grievances. Also, a good GRM should enable and encourage the use of different local languages in channeling grievances, which makes it more accessible for those who may not understand the official language.

### **III. Responsive**

It is essential that a GRM should be responsive to the needs of its beneficiaries and non-beneficiaries. It should ensure that grievances are acknowledged, and issues resolved promptly. Staff handling the complaints must follow the agreed targeted timelines for resolving grievances. A responsive GRM will ensure that complainants are regularly informed on the progress or status of their grievances. A good GRM should be responsive to the needs of different people, including vulnerable persons such as the elderly or disabled, and those who cannot speak or write in English. It should also take a survivor-centered approach to gender-based violence (GBV) and sexual exploitation and abuse / sexual harassment (SEA/SH) complaints.

### **IV. Fair and Objective**

Grievance handling staff should be fair and objective when handling and managing grievances. Grievances should be handled with all sense of fairness and without any bias. Staff receiving grievances should be objective and empathetic towards the complainant and should not be defensive, unfair or seen to be taking sides. Complainants should feel that they were treated fairly and with respect.

## **8.8 Expectation When Grievances Arise**

When local people present a grievance, they generally expect to receive one or more of the following: acknowledgement of their problem, an honest response to questions/issues brought forward, an apology, adequate compensation, modification of the conduct that caused the grievance and some other fair remedies

In voicing their concerns, they also expect to be heard and taken seriously. Therefore, the company, contractors, or government officials must convince people that they can voice grievances and work to resolve them without retaliation. To address these challenges, companies are being called upon to lead and work with their host communities to fund non-judicial, dialogue-based approaches for preventing and addressing community grievances.

## **8.9 Grievance Redress Process**

At the time that the individual resettlement plans are approved and individual compensation contracts are signed, affected individuals and communities will have been informed of the process for expressing dissatisfaction and to seek redress. The grievance procedure will be

simple and administered as far as possible at the local levels to facilitate access, flexibility and ensure transparency. All the grievances will be channelled via the Resettlement and Compensation Committee for each sub project at the sub-project level.

There is no ideal model or one-size-fits-all approach to grievance resolution. The best solutions to conflicts are generally achieved through localized mechanisms that take account of the specific issues, cultural context, local customs and project conditions and scale. Annex 4 contains grievance redress forms that could be used for grievance mechanism. In its simplest form, grievance mechanisms can be broken down into the following primary components:

**a. Registration**

The first step is the presentation of a grievance at the uptake point at any level. The social contact person or secretary of the committee will receive grievance from the complainant, register and acknowledge receipt of grievance to the grievant within 2 days. The registration form will capture the following data: 1) Case number, 2) Name of the complainant, 3) Date of the grievance, 4) Gender, 5) Complete address, 6) Category of the grievance, 7) persons involved, and impacts on complainant life, 8) Proofs and witnesses, and 9) Previous records of similar grievances.

**b. Verification**

The verification determines among other things whether the matter has relationship with the project activities, and whether the matter can be handled/resolved at the level where it is presented. This will determine if the matter should be referred to the next level or not. Part of the investigations may also be to assess the cost of lost or risk involved in the grievance.

**c. Processing**

The processing step is when options for the approach to resolving the case are weighed and determined. Parties involved in the case are brought together for the first attempt at resolution with suggestions from the parties on practical steps to be taken which may also involve site visit for physical inspection and determination of the claim.

**d. Feed back**

All responses to the complainant in a grievance redress process that moves beyond a unit level must be communicated in writing and/or by verbal presentation to the complainant. This will include a follow up on the corresponding authority where cases are referred, to ascertain the status of reported cases. Feedback on outcome of each case should get to the complainant through the secretary of committee or social contact/safeguard person. It is expected that reported complaints at each level will be resolved and determined within **21 days** from date of receipt of the complaint.

## **CHAPTER NINE**

### **CAPACITY BUILDING AND TRAINING REQUIREMENTS**

#### **9.0 Introduction**

The weak institutional capacity to implement the project components and to effectively monitor progress and embrace full accountability for results (section 7.0) will require that proper emphasis be given to building the capacity of SU Federal & State personnel through regular refresher training to maintain optimal quality of E&S performance, which will be beneficial during staff turnover. This will contribute to the successful implementation of the ESMF, which will depend strongly on the commitment of the related institutions and the capacity within the institutions to apply or use the framework effectively, and the appropriate and functional institutional arrangements.

#### **9.1 Capacity Building**

For effective implementation of the ESMF, there will be need for technical capacity in the human resource base of implementing institutions as well as logistical facilitation. In addition, it is also important to provide the computers and equipment to facilitate the preparation and review of E&S reports will aid capacity development in the SPCUs. Implementers need to identify and understand the social and environmental issues, and this could be financed through Component 3 that will finance a number of activities related to project management, citizen engagement, and monitoring, evaluation, and learning at both federal and state levels

Appropriate understanding of the mechanisms for implementing the ESMF will need to be provided to the various stakeholders implementing NFWP-SU. This will be important in order to support the NFWP-SU FPCU (E&S compliance unit) and SPCU.

To enhance the respective roles and collaboration of the relevant stakeholders, the following broad areas (not limited to) for capacity building have been identified as deserving of attention for effective implementation of the ESMF:

1. Project Management
2. Environmental Impact Assessment (EIA);
3. Resettlement Planning and Implementation;
4. Management of Labour-induced project risks;
5. GBV risks and mitigation;
6. Occupational Health and Safety
7. Environmental Management Planning;
8. Monitoring and Environmental Audit;
9. Annual Environmental Report preparation and other reporting requirements;
10. Public participation techniques Public Hearing Procedure;
11. Public awareness creation / educational techniques (on environmental, social and health issues).
12. Integration of Environmental and Social Assessments in Project Design and Procurement strategies.
13. Grievance Redress Procedures

Capacity building efforts are needed at four different levels to enable taking specific responsibilities in the promotion of NFWP-SU programs at Federal, state and local levels.

#### **9.2 Capacity Building at Federal Level**

At the Federal level, capacity building needs to build upon the already existing ministerial institutions. They are primarily concerned with development and promotion of institutions and organizations that deal with policymaking and legislation.

The NFWP-SU SPCU, which has already been established, consists of a multidisciplinary interdepartmental (inter-ministerial) committee for the crisis and recovery management and exchange of related expertise. The committee should consist of the major ministries concerned, such as Ministries of Agriculture, Environment, Forestry, Water Resources, and others, as appropriate.

### **9.3 Capacity Building at State Level**

Capacity building at the State level provides the link for the two-way feedback process between Federal and Local level activities. The State level will require more detailed integrated planning and management capacity building.

Capacity building is a continuous process and for proper implementation at the state level the following stages may be considered:

**Motivation stage:** Using mass education techniques to create awareness of the NFWP-SU to the people in their various communities and to promote participation in the program.

**Technical assistance stage:** Training on actual planning, design, layout and physical or biological engineering interventions.

**Follow-up stage:** assistance to selected target groups by the extension agency in obtaining loans for farming inputs and in marketing their produce; and by the responsible government institutions in the maintenance of conservation structures and practices.

### **9.4 Capacity Building at Local Level**

Detailed planning, development and implementation take place at the local level. A necessary precondition for sustainable adoption of solutions is that the changes must be profitable and provide tangible benefits to the land users. Mechanisms need to be developed to influence the behavior of land users in such a way as to motivate them to adopt the desired measures. Capacity building efforts for crisis and recovery management will mainly involve generation of scientific, technological and administrative knowledge, policy integration, creating of public awareness and making available material and human resources, as well as promoting strong responsible organizations and institutions based upon the existing institutional set-up.

Capacity development for community facilitators, GRC and field-level staff will be implemented because they are the organs that will reach out to the communities, and it becomes necessary for these staff and representatives to be well grounded with adequate information on the project. They will be able to communicate effectively in the local languages, understanding community dynamics and processes, negotiation and conflict resolution, and empathizing with communities and their needs. Building trust and maintaining good rapport with the people in the Project areas by providing relevant information on the project and responding effectively to their needs and concerns will help solve issues before they even become grievances. It is also important that the community facilitators, GRC and field-level staff provide feedback to the SPCUs.

Table 19, 20 and 21 highlights specific areas for effective institutional capacity needs. Training programs are scheduled for Environmental and social accountability, Health Impact Assessment (HIA), table and Occupational health and safety management plan (OHSMP).

### **9.5 Capacity Building for Contractors**

Capacity development for contractors will be required to strengthen the capacity of the supervisory and workforce personnel, especially in the area of implementation and monitoring. Consequently, the SPCU will be required to carry out training workshops to guide the operationalizing of the ESMF in topical areas, which would include:

- The Permit Schedule
- World Bank's E&S standards, compliance and environmental and social management. The Code of conduct for contractor and his/her labour force management plan
- Public health and safety issues, occupational health
- Grievance Redress Mechanism for the project
- Best practise approach to monitoring and reporting
- Sensitization of workers on issues such as child sexual exploitation, labour influx, Gender Based Violence SEA/SH, CoC, HIV/AIDS, and their mitigation measures.

**Table 19: Refresher Training Programs (Environmental and Social Accountability)**

Programme	Description	Participants	Form of Training	Cost Naira (₦)	Training Conducting Agency
Sensitization Workshop	Environmental Assessment <ul style="list-style-type: none"> <li>• Basic Concept of Environment</li> <li>• Environmental Regulations and Statutory requirements as per Government and World bank</li> </ul>	FPCU/SPCU E&S compliance unit, Environmental/Safeguard Unit, Procurements & other relevant groups, MoWASD, MoE/EPA	1-day Workshop	3,000,000	Environmental & Social Specialists of Design Consultant/External Agency engaged for capacity building
<b>Sub-Total (Env &amp; Social Accountability)</b>			<b>N3,000,000</b>		

**Table 20: Training Programs (Environmental & Social Management)**

Programme	Description	Participants	Form of Training	Cost Naira (N)	Training Conducting Agency
<b>Module I</b>	Introduction to E&S standards compliance <ul style="list-style-type: none"> <li>• Different safeguard policies &amp; triggers</li> <li>• Applicable ESS to Nigeria for Women project scale up</li> </ul>	FPCU/SPCU E&S compliance unit, MoE/EPA (Technical unit)	1-day Workshop  2 Day Programme of activities	2,000,0000	Environmental & Social Specialists of Design Consultant/External Agency engaged for capacity building
<b>-Module II</b>	Identifying Environmental & Social Risks – NFWP-SU <ul style="list-style-type: none"> <li>• Environmental &amp; Social Screening</li> <li>• Identifying Environmental &amp; social risks in activities</li> <li>• Impact identification &amp; mitigation</li> <li>• Waste characterisation and mangt.</li> </ul>	FPCU/SPCU E&S compliance unit, MoE/EPA (Technical unit)	½ Day Workshop	1,500,000	Environmental & Social Specialists of Design Consultant/External Agency engaged for capacity building
<b>Module III</b>	Occupational Health & Safety <ul style="list-style-type: none"> <li>• Basics of HSE</li> <li>• Preparing safe work practice and procedures at work</li> </ul>	Contractor Safety Officer, Environmental E&S standards compliance Officer	Lecture and Field Visit	1,000,000	Environmental & Social Specialists of Design Consultant/External Agency engaged for capacity building
<b>Module IV</b>	Environmental Management Planning <ul style="list-style-type: none"> <li>• Environmental &amp; Social Impacts</li> <li>• Requirements</li> <li>• Co-operation &amp; Coordination with other Departments</li> </ul>	Officials of MoE/EPA, and other line MDAs	1/2-day Workshop	1,000,000	Environmental & Social Specialists of Design Consultant/External Agency engaged for capacity building
<b>Module VI</b>	Monitoring & Environmental Audit: <ul style="list-style-type: none"> <li>• Roles and Responsibilities of</li> </ul>	Officials of MoE/EPA, and other line MDAs	1/2day Workshop	2,000,000	Environmental & Social Specialists of Design Consultant/Exter

Programme	Description	Participants	Form of Training	Cost Naira (N)	Training Conducting Agency
	officials/contractors/consultants towards protection of environment and Implementation Arrangements •Monitoring mechanisms				nal Agency engaged for capacity building
Module VII	Public awareness creation • Tools to improving awareness on project goals • Labour management •Community Participatory Monitoring and Evaluation •Security awareness	Community leaders/CBOs/NGOs	1/2day	1,500,000	of Design Consultant/External Agency engaged for capacity building
<b>Sub-Total (E&amp;S Management)</b>				<b>N9,000,000.00</b>	

**Table 21: Refresher Training Programs (Occupational Health and Safety Management Plan - OHSMP)**

Training Required	Who to train	When	Form of training	Training Costs USD
<b>Occupational Health and Safety Leadership Management</b>	NFWP-SU PCU(Federal), NFWP-SU PCU(State), FME, project affiliated MDAs, Contractors, Project affected Community representatives	During project initiation stage (Before commencement rehabilitation works)	½ day workshop	1,500,000.00
<b>Occupational Health Risk Assessment</b>	NFWP-SU PCU(Federal), NFWP-SU PCU(State), FME, project affiliated MDAs, Contractors	During project initiation stage (Before commencement of civil works)	½ day workshop	1,500,000.00
<b>Subtotal (OHSMP)</b>			<b>N3,000,000.00</b>	

**Table 22: Equipment for E&S Performance**

No.	Description	Cost Naira (₦)
1.	Computers, Printers and internet modems for FPCU	2,500,000
2.	Computers, Printers and internet modems for SPCU	7,000,000
<b>Sub Total for Equipment</b>		<b>9,500,000.00</b>

## **CHAPTER 10**

### **STAKEHOLDER ENGAGEMENT AND PUBLIC CONSULTATIONS**

#### **10.0 Public Consultation**

The GoN recognizes the importance of open and transparent engagement between the NFWP-SU and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. Stakeholder participation during project planning, design and implementation is widely recognized as an integral part of environmental and social management for projects. It is a two-way flow of information and dialogue between project proponents and stakeholders, which are specifically aimed at developing ideas that can help shape project design, resolve conflicts at an early stage, assist in implementing solutions and monitor ongoing activities.

NFWP-SU will 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. To facilitate the accomplishment of these goals, the stakeholder engagement will be a vital inclusive process conducted throughout the project life cycle that will be prepared as a standalone document under the ESS10 and will guide the engagements that would take place at the inception of the planning stages and shall continue through the lifecycle of the project. Public participation and consultation would take place through meetings, radio programs, requests for written proposals/comments, filling in of questionnaires, explanations of project to the locals, making public documents available at the federal, state and local levels. At the local level, suitable locations will include the Village squares, churches halls, residences of traditional or recognized leaders. These measures would take into account the low literacy levels prevalent in these rural communities by allowing enough time for responses and feedback.

#### **10.1 Objectives of Public Consultations**

The Stakeholder Engagement Plan (SEP) provides a framework for achieving effective stakeholder participation in undertaking E&S risk assessment and promoting greater awareness and understanding of issues so that the project is carried out effectively within budget and on-time to the satisfaction of all concerned. This minimizes the risk of conflict which could impair successful completion of the project. To ensure effective implementation of this plan, the SPCU and relevant authorities involved in the project shall be committed to the following principles:

- To provide information about the proposed project;
- To provide opportunities for stakeholders to discuss their concerns and offer recommendations;
- To gain insight on the role of each stakeholder in the implementation of the E&S standards compliance as well as structures in place for the management of the proposed facilities;
- To provide and discuss with stakeholders the alternatives considered to reduce anticipated impacts;
- To identify and verify significance of environmental, social and health impacts; and promote openness and communication.
- increasing public knowledge and understanding of the project implementation process;
- ensuring effective stakeholder participation in the development of the project;
- using all strategies and techniques which provide appropriate, timely and adequate opportunities for all stakeholders to participate; and
- evaluating the effectiveness of the engagement plan in accordance with the expected outcomes.

#### **10.2 Stakeholder Consultation**

Consultations are an important tool in identifying the major environmental and social issues that form a vital aspect of the preparation of this ESMF and some of the key stakeholders that were identified for consultations included stakeholders from participating States NFWP-SU Project



Implementation Unit, the zonal representatives from the Federal Ministry of Environment (FMEnv), State Ministries of Environment, State Ministries of Water Resources, Lands, Works & Infrastructure, State Waste Management Agency, beneficiary community groups and Civil Society Organizations representing the public and project affected people, village heads, physically challenged, local community leaders and women groups in communities. Due to the COVID-19 pandemic and potential transmission risks, some of the beneficiaries were contacted on phone to obtain their views. Additionally, considering the social barriers in the North East where women are less likely to be consulted for developmental issues, the meetings with women were held separately in all the Participating States, to enable the women express their views with confidence without fear of discrimination or criticism, which is aimed at ensuring inclusiveness in the consultation process. Some of the issues identified during the consultations held in participating States is summarized in Table 23 as follows:

<b>Table 23: Summary of Stakeholders Meetings conducted as part of the preparation of this ESMF</b>		
<b>Date</b>	<b>23<sup>rd</sup> November, 2022</b>	
<b>Venue</b>	Virtual stakeholder meeting organised by the NFWP & World Bank team	
<b>Total stakeholders</b>	68 stakeholders from 20 States	
<b>In Attendance</b>	<b>Stakeholders in attendance:</b> Honourable Commissioners, permanent secretaries, directors of planning, heads of research of Ministries of Women Affairs, Ministry of Environment, Lands & Justice.	
<b>Language of communication</b>	English Language, Hausa Language and Pidgin English	
<b>Introduction</b>	The TTL for NFWP SU carried out the introductions and welcomed everyone to the meeting. The Head of Personnel for the FPCU welcomed the participants and explained to the forum the NFWP project and objectives. She further discussed the NFWP scale up and the major purpose for the consultations to the stakeholders as a need to have the inputs of the participating States in the preparation of key environmental & social safeguard instruments; ESMF, IPMP, RF and SEP, which are to define, guide and strengthen E&S performance on the Nigeria for Women Project Scale Up.	
<b>Perception about the Project</b>	The perception of the project was positive. The new participating States expressed their delight in being a part of the project, while the States that were a part of the former project also expressed their pleasure in being a part of the second phase.	
<b>Some Environmental &amp; Social Challenges</b>	The head of the Federal safeguards team for the NFWP, the National GBV advisor, discussed the overall E&S rating for the project is moderate and purpose of environmental & social safeguards is necessary to ensure that projects do not adversely affect receiving environments or the people that make up the societies within them. This is the reason why the documents under preparation are vital for taking E&S related decisions on this project.	
<b>Feedback</b>		
<b>Issues raised by</b>	<b>Concerns, Questions and Clarifications</b>	<b>How this was addressed</b>
<b>General issues discussed by the Consultant</b>	<b>Environmental Legislation</b> Do the participating States have any mandates regarding environmental protection and how are they pursued?	The participating States indicated that majority of them have environmental laws in place at State level and also, by domestication of the Federal law ( <i>Environmental Impact Assessment (EIA) Act No. 86 of 1992</i> ) In addition, the ministries have departments that are mandated to enforce the laws on the management of waste in their respective States, thereby ensuring that the legal

		framework is in place for implementing E&S performance under the NFWP SU.
	<b>Social legislation</b> Do the participating States have any mandates regarding social protection and how are they pursued?	Some of the States such as Nasarawa have domesticated the Child Rights Act CRA, 2003), and the Violence Against Persons Prohibition Act (VAPP, 2015).
	<b>Grievance redress</b> For the NFWP, how were grievances addressed?	The grievance redress mechanism (GRM) and the Security Management Plan (SMP) at FPCU level have been effective in addressing issues in the first phase of NFWP and will provide a good foundation under the NFWP SU.
	<b>Social &amp; religious barriers</b> Do barriers exist for women that will affect their access to land?	It was unanimously agreed among the representatives of the different States that access to land for women is not a major problem in any of the States. In the past, some cultural barriers existed, for example, in the South East where traditional norms & customs operated for generations were impediments to women's development. However, this is no longer a barrier. In the opinion of the participants, the major barrier to women's development is now empowerment, especially access to finances for purchase of land or ownership
	<b>Agricultural activities &amp; pest control</b>	Regarding the agricultural activities that are currently being carried out by women in their States, Lagos noted that the State has women that are already involved in the cultivation of cassava & melon, while piggery and fish farming are also practiced. Bayelsa also has women engaged in fish farming. In addressing pest problems associated with such activities, Ogun State explained how they practice crop rotation as a cultural method to address pest problems. This indicates their understanding of the problems associated with such activities.
	<b>Capacity</b> Do the States possess sufficient capacity to implement this ESMF?	FPCU has carried out training of personnel under the first phase and there is sufficient capacity in these States to implement the ESMF, IPMP, RF and SEP for the SU. This training will continue into the second phase for all the participating States.

## **CHAPTER 11**

### **ESMF MONITORING & EVALUATION**

#### **11.1 Introduction**

This Chapter presents the approach that will guide the monitoring and evaluation process under the NFWP-SU in operationalizing this ESMF.

#### **11.2 Environmental and Social Management Plans (ESMPs)**

ESMPs will be very important and useful implementation tools for the management and mitigation of identified environmental and social impacts under the NFWP-SU.

##### **11.2.1 Monitoring and Evaluation**

The objectives of monitoring and evaluation for the ESMF are as follows:

- To alert the PCU by providing timely information about the success or otherwise of the environmental management process outlined in the ESMF. This will ensure continuous improvement in the environmental and social management process of the NFWP-SU even after the project is concluded.
- It will determine where gaps may exist between implementation targets and actual project accomplishments.
- To make a final evaluation in order to determine whether the mitigation measures incorporated in the technical designs and the ESMP have been successful.

Thus, this section will set out the requirements for the monitoring of the environmental and social impacts of the NFWP-SU activities. Monitoring of environmental and social indicators will be mainstreamed into the overall monitoring and evaluation system for the project.

Monitoring will be used to measure the success rate of the project; it will also be used to determine whether the established mitigation measures have resulted in dealing with the negative impacts associated with the project. It will be used to establish whether further monitoring is to be extended in some areas.

The key issues to be considered in the NFWP-SU subprojects include construction activities, monitoring of water quality, agricultural production, land use and acquisition, income generation and population influx.

Monitoring and surveillance of subprojects should take place on a "spot checks" basis, which means that the investigation should be carried out at random or limited to a few instances.

#### **11.3 Indicators for monitoring the participation process**

##### **11.3.1 Input Monitoring**

Input monitoring seeks to oversee and guide effort appropriation to ensure adequate and compliant deployment of resources, staff, training, capacity building and other resource assets. Input or internal monitoring is the sole responsibility of the Project Management Team and is structured in tune with the governance component of the NFWP-SU, along the lines of the World Bank standards and oversight.

##### **11.3.2 Output Monitoring**

Output monitoring is to ensure that environmental and social management measures are implemented as recommended in line, to time and to scale. This involves both internal and external monitoring activities.

##### **11.3.3 Impact Monitoring and Evaluation**

Impact monitoring and evaluation are spot and final checks; to confirm that ESIA/ESMP investments achieve their intermediate and final objectives.

#### 11.4 Evaluation of Results

The evaluation of results of environmental and social mitigation can be carried out by comparing baseline data collected in the planning phase with targets and post project situations.

#### 11.5 Monitoring of ESMF Implementation

In addition to the project reports required, the Independent Consultant will prepare a quarterly audit on ESMF implementation, which will be delivered to NFWP-SU SPCU. Furthermore, each subproject to be implemented in participating States that may require an EIA/ESMP study (or RAP etc.) will also be required to produce an annual audit report for delivery to the NFWP-SU SPCU. Tables 31 and 32 describes the monitoring and evaluation framework for the ESMF.

#### 11.6 Reporting

The SU will provide regular reports as set out in the Environmental & Social Commitment Plan (ESCP). The report will provide an accurate and objective record of project implementation, including compliance with the ESCP. The FPCU will prepare bi-annual reports to the Association throughout Project implementation, commencing after the Effective Date. In addition, the report will include information on stakeholder engagement conducted during project implementation in accordance with ESS10.

#### 10.7 Budgets for the ESMF Implementation

The ESMF implementation budget is presented in Table 22.

**Table 24: Estimated Annual Budget to Implement ESMF**

<b>1</b>	<b>ESMF Requirements</b>	<b>Considerations</b>	<b>Total Cost per State (N)</b>	<b>Total (\$)</b>
<b>A</b>	<b>Training &amp; Capacity Strengthening</b>			
i.	Capacity Building for FPCU & SPCU Personnel	Refresher training programs	3,000.000.00	6,742.00
	Capacity Building for FPCU & SPCU Personnel	Workshops to be held in individual States.	12,000,000.00	26,966.00
Ii	Equipment	FPCU & SPCU	9,500,000.00	21,348.00
<b>B</b>	<b>Mitigation &amp; Management</b>			
i.	Engagement of Environmental and Social Specialists	Preparation & Management of Safeguard Instruments	As contained in item 3 below.	
ii.	Establish Environmental & Social measures for mitigation of E&S Issues during operations	Safeguard Instruments	15,000,000.00	33,708.00
<b>C</b>	<b>Environmental &amp; Social Monitoring</b>			
i.	Monitoring Compliance with EMP on E&S Issues during pre-operations activities	Assume quarterly monitoring activities over 5 days each quarter per year	2,000,000.00	4,494.00
ii.	Routine field visits for inspections of E&S compliance Unit	To cover transport, accommodation and daily allowances	1,500,000.00	3,371.00
<b>D</b>	<b>GBV Monitoring</b>			
	Routine field visits for inspections of GBV compliance Unit	To cover transport, accommodation and daily allowances	4,500,000.00	10,112.00

	<b>Total Estimated Budget</b>	<b>47,500,000.00</b>	<b>106,742.00</b>
<b>Contingency</b>	<b>10% of sub-total</b>	4,750,000.00	10,674.00
<b>Total (for 1 State)</b>		<b>52,250,000.00</b>	<b>117,416.00</b>
<b>Total for 12 States</b>		<b>627,000,000.00</b>	<b>1,408,989.00</b>

\$1.00 = ₦445.00 (CBN rate of December 5, 2022)

In this budget, the following estimates have been considered:

- The budget for equipment for the FPCU and SPCU is captured in the estimate
- GRM estimates has not been captured under this budget
- This estimate has captured cost of implementing the LMP
- This budget does not include the cost for implementation of the SEP
- This budget does not include the cost for implementation of the RF
- Budget for the appointment of NGO to monitor GBV/SEA in NFWP-SU is included

### 11.7 Disclosure of ESMF

The final version of this ESMF will be disclosed on the WB website. The process of disclosure includes publication in two National Newspaper informing the general public venues and locations where the ESMF will be display in the implementing states for people to make input for a stipulated period of time; after which it will be lodged in World Bank external website, like other E&S instruments (such as ESIA/ESMPs etc.) that would be prepared for the NFWP SU and its sub-projects will be made available to the public by the FPCU.

The FPCU will disclose the ESMF as required by the Nigeria EIA public notice and review procedures as well as the World Bank Disclosure Policy at the World Bank external website.

Copies of other E&S standards compliance instruments (such as ESMPs/RFs etc.) are required to be disclosed in like manner. Table 25 presents documents to be disclosed. All reasonable efforts must also be made to exposure them at strategic points within the project’s area of influence so as to allow all stakeholders to read and understand how they stand to be affected by the project.

**Table 25: Typical documents to be disclosed**

<b>Topic</b>	<b>Documents to be disclosed</b>	<b>Frequency</b>	<b>Media</b>
<b>Public Consultation</b>	Minutes of Formal Public Consultation Meetings	Within two weeks of Meeting	Implementation agency’s website/ Project Management Unit & Project Implementation Units (FPCU), Ministry of Environment, Local government Secretariat
<b>Environment and Social Management</b>	ESMF, ESIA, ESMP with Key Actions, E&S Monitoring reports, and audit	Prior to awarding works and to remain on website	World Bank external website. Implementation agency’s website/ Project Management Unit (FPCU/SPCU) & Ministry of Environment, Local government Secretariat

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**Annex 1**

**List of Persons Met during the Study**

<b>s/n</b>	<b>Name</b>	<b>Organization</b>	<b>Title</b>
1	Mrs Ruth Mshiela	NFWP	Project Coordinator
2	Mrs Mary Bishop	NFWP	National GBV Advisor
3	Mr. Michael Ilesanmi	World Bank	Social Specialist
4	Mr Lucky Erhaze	World Bank	Env Specialist
5	Esther Eghobamien-Mshelia	FMoWASD	SA Technical to Hon Minister
6	Chuma Ajaegbu N. Joe	FMoWASD	
7	Mr. Efe	FMoWASD	
8	Garba Umar	Kebbi MoWASD	Director Social Welfare
9	Yakubu Mohammed	Kebbi MoWASD	Director Planning & Research
10	Hassan Hassan Wara	Kebbi MoWASD	Acting Perm. Secretary
11	Maimuna Abdullahi	Kebbi MoWASD	Director Women Affairs
12	Muhammed Haruna	Kebbi MoWASD	Director Social Security
13	Bello Ahmed	Kebbi MoWASD	Director Finance
14	Samira Ibrahim	Kebbi MoWASD	Director Admin
15	Halilu Abubakar	Kebbi MoWASD	Ag. Director Child Dev.
16	Bashiru Bakuwai	Kebbi MoLands	Deputy Director Lands
17	Ahmed Musa	Kebbi MoLocal Govt	Deputy Director
18	Umar B. Diggi	Kebbi MoEnv.	Director Forestry
19	Danladi Aliyu	Kebbi MoCommerce & Industry	Deputy Director
20	Samuel H. Rachael	Kebbi NGO - QBWA	State Coordinator
21	Zuwaira Mohammed	Kebbi Market women Asso.	Secretary
22	Magaret Bawa	MLFCAFF	DDCD
23	Bala Muhammed	Kebbi Min of Agric.	Director
24	Fatima Usman	National Council of Women Society	PRO.
25	Musa K. Umar	Kebbi State EPA	General Manager
26	Nasiru Husaini	Kebbi NESREA	Ag. State Coordinator

<b>s/n</b>	<b>Name</b>	<b>Organization</b>	<b>Title</b>
27	Faruku Musa	Kebbi UDA	Deputy Director Env. Health
28	Mustapha Ismail	NESREA	Scientific Officer
29	Kabiru Garbe	Kebbi UDA	Assistant Director
30	Safiya Abdullahi	Muna H/crafts	Secretary
31	Ugoeze Kate Onyemachi	Abia MoWASD	Hon. Commissioner
32	Chikezie E. Nnena	Abia MoWASD	Perm. Secretary
33	Georgina M. Agbagha	Abia MoWASD	Director Women Affairs
34	Chinyere Nwaogwugwu	Abia MoWASD	D. Director Women Affairs
35	Chimuanya AUC	Abia MoWASD	Director Finance
36	Nnennaya O. Nwuka	Abia MoWASD	Director Social Welfare
37	Onwuha Felicia	Abia MoWASD	HOD PRS
38	Okpara Felix	Abia MoWASD	Director Rehab.
39	Nwankwo Chioma	Abia MoWASD	Principal SAC
40	Ubalua Edith	Abia MoWASD	D. Director Child Dept.
41	Oluchi Franklin Oji	Abia MoWASD	PRO
42	Iyke Ukeagbu	Abia MoEnv	Director/HOD
43	Ude NO	CEPROD	ED
44	Okere Ijeoma	Oganili Ndaci multipurpose	Woman Chairperson
45	Felicia Kalu	Ifunaya women	Chairlady
46	Ibaluwe Sylvanus	Min. of Lands	DPRS
47	Emuchay T.OC	Min of Agric	Director (SACUB)
48	Mrs Comfort Npoku	Nduro Women	Asst. President
49	Inegbu Dorothy O.	Otoubi Ugwugbo. Org	Chairperson
50	Owobe Nkechi	Otuobi Ugwugbo. Org	Treasurer
51	Azubuike T.F.	Abi Min of Rural Dev.	Rep. Perm Sec.
52	Eguzokpe RA	Min of Rural Dev.	Director Poverty
53	Machusumua	CSDP	MEM
54	Ugbor F.	Civil Service	HOD
55	Anaba, Sarah	NGO - Sanab Dev. Foundation	Founder
56	Chibueze O.	ASWA	Secretary
58	Ikechukwu Owobe	Otuobikunwo	Member
59	Christ Oscar	Oscartina Org.	Chairman
60	Anikpe E.	Otubi	Member
61	Dorothy Onwukwe	Otubi multipurpose org.	Chairlady
62	CHineyere Nwaogbgkwu	Abia MoWASD	Director Gender



<b>S/N</b>	<b>NAME</b>	<b>ORGANISATION</b>
63	Mr Lawan Garba	Permanent sec.MoWA
64	Mr Issac Finya Yafara	SPC NFWP
65	Babangida Kawu	Project Accountant NFWP
66	Eduseh Haruna	Procurement Officer NFWP
67	Hon Bolaji Dada	Hon Comm
68	Mrs Salami	Director Poverty Alleviation
69	Mrs Shyllon	Director Women Affairs
70	Mr Disu	Director Procurement
71	Mrs Adeyanju	Director Planning Research and Statistics
72	Mrs Oluyemi Kalesanwo	PS Lagos State MoWA
73		Department, Min of Economic Planning, Delta state
74	Panebi Jacob	Director of Women Affairs, Bayelsa State
75	Esther Ameadaji	Secretary MCSC
76	Koroye Asene Judith	Fadama III Min. of Agriculture, Bayelsa state
77	Oyindoubra Biayeibo	Scientific Officer Min of Environment, Bayelsa state
78	Mrs Oghenekevwe Agas.	Permanent Sec. MoWA community and social development Delta state
79	Dr Daniel Eeanwu	Perm Sec. Min. of women and Social Welfare, Anambra state
80	Am Dr. Barira Ibrahim	Perm. Secretary Zamfara State Min for Women and children affairs Gusau

**Annex 2:**

**Checklist for Screening Report for Environmental Impacts**

Title of sub-project/activity: Rehabilitation & Intervention Works under NFWP-SU

Brief description of the sub-

Project/activity: Rehabilitation &

Construction work

Location: Participating States

**Section 1: Environmental Checklist**

INTRODUCTION				
1	Does the site/project require any rehabilitation?	Yes	No	If yes, give the extent in ha or km
	Is it an existing project?	<input type="checkbox"/>	<input type="checkbox"/>	
	Does the rehabilitation work require any of the following?			
	Reclamation of land/wetland	<input type="checkbox"/>	<input type="checkbox"/>	
	Clearing of forest	<input type="checkbox"/>	<input type="checkbox"/>	
	Felling of trees	<input type="checkbox"/>	<input type="checkbox"/>	
2	Expected construction period (for infrastructure)			
3	Anticipated Date of Completion			
4	Present Land Ownership	State <input type="checkbox"/>	Private <input type="checkbox"/>	Other (specify)
5	Total approximate Cost of the Project			

DESCRIPTION OF THE ENVIRONMENT					
PHYSICAL					
9	Topography & Landforms (map): Attach an extract from relevant 1: 50,000 topographic sheet/if detailed maps are available provide them. If this information is unavailable, please describe the location.				
10	Relief (difference in elevation)	Low <20m <input type="checkbox"/>	Medium 20-40m <input type="checkbox"/>	High 40-60 <input type="checkbox"/>	>60m <input type="checkbox"/>
11	Slope	Low <30% <input type="checkbox"/>	Medium 30-40% <input type="checkbox"/>	High 40-60% <input type="checkbox"/>	Very High >60% <input type="checkbox"/>
12	Position on Slope	Bottom <input type="checkbox"/>	Mid-slope <input type="checkbox"/>	Upper slope <input type="checkbox"/>	
13	Soil Type				
14	Depth of topsoil	Shallow <20cm <input type="checkbox"/>	Moderate 20-100cm <input type="checkbox"/>	Deep >100cm <input type="checkbox"/>	
15	Soil Erosion (this information will be based on the site and surrounding environment)	Low <input type="checkbox"/>	Medium <input type="checkbox"/>	High <input type="checkbox"/>	
16	Climate	Wet <input type="checkbox"/>	Dry <input type="checkbox"/>	Arid <input type="checkbox"/>	
17	Annual dry period				

DESCRIPTION OF THE ENVIRONMENT					
PHYSICAL					
24	Incidence of Natural Disasters	Floods <input type="checkbox"/>	Prolonged droughts <input type="checkbox"/>	Cyclones/ tidal waves <input type="checkbox"/>	Other (specify) <input type="checkbox"/>
25	Environmental Hazards	Landslides <input type="checkbox"/>	Rock falls <input type="checkbox"/>	Subsidence <input type="checkbox"/>	Other (specify) rainfall runoff <input type="checkbox"/>

ECOLOGICAL						
26	Habitat Types in the Project Site (indicate the approximate % of each habitat type)	Natural forest	degraded forest	natural scrubland	riverine forest	abandoned agricultural land
		Marsh	lagoon	estuary	coastal scrub	mangrove
		salt marsh	home-gardens	grassland	degraded scrubland	Other(list)
27	Habitat types within 500m radius from the site periphery (indicate the approximate % of each habitat type)	Natural forest	degraded forest	natural scrubland	riverine forest	abandoned agricultural land
		Marsh	lagoon	estuary	coastal scrub	mangrove
		salt marsh	home-gardens	grassland	degraded scrubland	Other(list)

Screening Questions	Yes	No	Scale of impacts			Remarks
			High	Medium	Low	
<b>A. Siting of the Activity/ Sub-project</b>						

Are there any environmentally or culturally sensitive areas within the project site and 500 meters from the project boundary?

- |  |                          |                          |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> Protected Areas/ Forest Reserve | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> Migratory pathways of animals   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <input type="checkbox"/> Archaeological sites            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Screening Questions	Yes	No	Scale of impacts			Remarks
			High	Medium	Low	
<input type="checkbox"/> Wetlands	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/> Mangrove strands	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/> Special area for protecting biodiversity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are there any plants (endemic and threatened species) of conservation Importance within the project site 500meters from the project boundary?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Are there any animals (endemic and threatened species) of conservation Importance within the project site 500meters from the project boundary?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>B. Potential Environmental</b>						
Will the activity/sub-project cause						
<input type="checkbox"/> land disturbance or its clearance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/> negative effects on rare (vulnerable), threatened or endangered species of flora or fauna or their habitat?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/> negative effects on designated wetlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/> spread of invasive plants or animals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/> Negative effects on wildlife habitat, Populations, corridors of movement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/> negative effects on locally important or value the ecosystems or vegetations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/> destruction of trees and vegetation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> impact on fish migration and navigation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

<input type="checkbox"/> obstruction of natural connection Between river and wetlands inside project area or natural drainage	Scale of impacts			Remarks
	High	Medium	Low	
<b>Screening Questions</b>	<b>Yes</b>	<b>No</b>		
system?				
<input type="checkbox"/> water logging due to inadequate drainage?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Insufficient drainage leading to Saline intrusion?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> negative effects on surface water Quality/quantities or flow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> negative effects on groundwater Quality, /,quantity or movement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> increased demand of water Requirement leading to reduction of water supply for competing uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> increase probability of spread of Diseases and parasites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> significant sedimentation of soil Erosion or shoreline or river bank erosion on/ or off site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> loss of existing buildings property, economic livelihood?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> negative impact on soil stability And compactness?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*Environmental & Social Management Framework (ESMF) For Nigeria for Women Project Scale-up  
(NFWMP-SU)*

<input type="checkbox"/> impacts on sustainability of Associated construction waste disposal?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> changes to the land due to material extraction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> traffic disturbances due to Construction material transport and wastes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> increased noise due to Transportation of equipment and construction materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> increased noise due today-to-day Construction activities?					

**B. Potential Social Impacts**

<input type="checkbox"/> Will the activity cause labour influx?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Will it disrupt activities or have a negative impact on the communities or their existing lifestyle?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Will there be any physical displacement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Will the activity lead to economic displacement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> <del>Is</del> the sub-project likely to experience insecurity concerns?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> What are the activities that can trigger conflicts in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> What is the plan to ensure social Inclusion in project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Have the vulnerable groups been identified?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**B. Potential Social Impacts**

**Screening Questions      Yes      No**

<b>FINAL OBSERVATIONS &amp; RECOMMENDATIONS</b>		
(d)	Does the proposed site meet the National urban planning requirements (only applicable for activities outside PAs)? If the answer is "No", what needs to be done to meet these requirements? If the answer is "Yes", has the project site	
(e)	In addition to the above issues, please indicate any additional	

Name and Contact information of officer making observations in SPIU:

Signature and Date

### **Annex 3**

#### **Outline of an Environmental & Social Management Plan (ESMP)**

List of Figures .....	.....
List of Tables .....	.....
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1.2 Description of the proposed Intervention .....	.....
1.3 Rationale for the Study.....	.....
1.4 Environmental and Social Safeguard Concerns .....	.....
1.5. Methodology of ESMP Study .....	.....
1.5.1. Literature review .....	.....
1.5.2 Field Visits .....	.....
1.5.3 Stakeholder Consultations .....	.....
1.5.4 Identification of potential risks .....	.....
CHAPTER TWO: INSTITUTIONAL AND LEGAL FRAMEWORK FOR ENVIRONMENTAL MANAGEMENT ....	.....
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2.2 Applicable Laws and International Regulatory Framework .....	.....
2.3 International Treaties and Conventions on Environment .....	.....
2.4 Gender-Based Violence.....	.....
2.4.1 State Laws Relevant to GBV .....	.....
2.4.2 Regional Treaties Relevant to GBV.....	.....
2.4.3 National Polices Relevant to GBV .....	.....
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CHAPTER THREE: Description of Biophysical Environment.....	.....
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3.3.3 Rainfall.....	.....
3.3.4 Relative Humidity (RH).....	.....
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3.3.10 Ecological Problems.....	.....
3.4 Analysis of Environmental Media in Project Area.....	.....
3.4.1 Air Quality .....	.....
3.4.2 Noise .....	.....
3.4.3. Water Quality .....	.....
3.4.3.1 Total dissolved solids (TDS) .....	.....
3.4.3.2 Dissolved Oxygen .....	.....
3.4.3.3 Exchangeable Cations.....	.....
3.4.3.4Heavy metals .....	.....
3.4.3.5Microbiology of Water.....	.....
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3.4.4.1Textural composition .....	.....
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4.3 Analysis of existing livelihood opportunities in project area .....	.....
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4.7 Gender and Gender-Based Violence Information.....	.....
4.7.1 Experience of Physical Violence in Ekiti State .....	.....
4.7.2 Additional Mitigation for Gender Based Violence (GBV)/ Sexual Exploitation and Abuse (SEA).	.....



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- 5.0 Analyzing the environmental and social impacts of the proposed project .....
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- 6.5 Contractual Measures.....
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- 7.1 Recommendations .....
- 7.2 Conclusion .....

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- Annex 1: Terms of Reference .....
- Annex 2: List of Persons Met During Study .....
- Annex 3: General Environmental Management Conditions for Maintenance/Maintenance Contracts..
- Annex 4: Sample – Socioeconomic data collection form (Questionnaire).....
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- Annex 6: Occupational Health & Safety (OHS) Plan.....
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- Annex 10: Waste Management Plan.....
- Annex 11: Cultural Heritage Management/Chance Find Procedure .....
- Annex 12: Labour Influx Plan.....
- Annex 13: Camp Management Plan .....
- Annex 14: Security Management Plan (Sample) .....

## **Annex 4: Environmental, Health & Safety Guidelines General Environmental Management Conditions for Maintenance/Maintenance Contracts**

### General

1. In addition to these general conditions, the Contractor shall comply with any specific Environmental Management Plan (EMP) for the works he is responsible for. The Contractor shall inform himself about such an EMP, and prepare his work strategy and plan to fully take into account relevant provisions of that EMP. If the Contractor fails to implement the approved EMP after written instruction by the Supervising Engineer (SE) to fulfil his obligation within the requested time, the Owner reserves the right to arrange through the SE for execution of the missing action by a third party on account of the Contractor.

2. Notwithstanding the Contractor's obligation under the above clause, the Contractor shall implement all measures necessary to avoid undesirable adverse environmental and social impacts wherever possible, restore work sites to acceptable standards, and abide by any environmental performance requirements specified in an EMP. In general, these measures shall include but not be limited to:

(a) Minimize the effect of dust on the surrounding environment resulting from earth mixing sites, asphalt mixing sites, dispersing coal ashes, vibrating equipment, temporary access roads, etc. to ensure safety, health and the protection of workers and communities living in the vicinity dust producing activities.

(b) Ensure that noise levels emanating from machinery, vehicles and noisy maintenance activities (e.g. excavation, blasting) are kept at a minimum for the safety, health and protection of workers within the vicinity of high noise levels and nearby communities.

(c) Ensure that existing water flow regimes in rivers, streams and other natural or irrigation channels is maintained and/or re-established where they are disrupted due to works being carried out.

(d) Prevent bitumen, oils, lubricants and waste water used or produced during the execution of works from entering into rivers, streams, irrigation channels and other natural water bodies/reservoirs, and also ensure that stagnant water in uncovered borrow pits is treated in the best way to avoid creating possible breeding grounds for mosquitoes.

(e) Prevent and minimize the impacts of quarrying, earth borrowing, piling and building of temporary maintenance camps and access roads on the biophysical environment including protected areas and arable lands; local communities and their settlements. In as much as possible restore/rehabilitate all sites to acceptable standards.

(f) Upon discovery of ancient heritage, relics or anything that might or believed to be of archaeological or historical importance during the execution of works, immediately report such findings to the SE so that the appropriate authorities may be expeditiously contacted for fulfilment of the measures aimed at protecting such historical or archaeological resources.

(g) Discourage maintenance workers from engaging in the exploitation of natural resources such as hunting, fishing, collection of forest products or any other activity that might have a negative impact on the social and economic welfare of the local communities.

(h) Implement soil erosion control measures in order to avoid surface run off and prevents siltation, etc.

(i) Ensure that garbage, sanitation and drinking water facilities are provided in maintenance workers camps.

(j) Ensure that, in as much as possible, local materials are used to avoid importation of foreign material and long-distance transportation.

(k) Ensure public safety and meet traffic safety requirements for the operation of work to avoid accidents.

3. The Contractor shall indicate the period within which he/she shall maintain status on site after completion of civil works to ensure that significant adverse impacts arising from such works have been appropriately addressed.

4. The Contractor shall adhere to the proposed activity implementation schedule and the monitoring plan / strategy to ensure effective feedback of monitoring information to project management so that impact management can be implemented properly, and if necessary, adapt to changing and unforeseen conditions.

5. Besides the regular inspection of the sites by the SE for adherence to the contract conditions and specifications, the Owner may appoint an Inspector to oversee the compliance with these environmental conditions and any proposed mitigation measures. State environmental authorities may carry out similar inspection duties. In all cases, as directed by the SE, the Contractor shall comply with

directives from such inspectors to implement measures required to ensure the adequacy rehabilitation measures carried out on the bio-physical environment and compensation for socio-economic disruption resulting from implementation of any works.

#### Worksite/Campsite Waste Management

6. All vessels (drums, containers, bags, etc.) containing oil/fuel/surfacing materials and other hazardous chemicals shall be bonded in order to contain spillage. All waste containers, litter and any other waste generated during the Maintenance shall be collected and disposed at designated disposal sites in line with applicable government waste management regulations.

7. All drainage and effluent from storage areas, workshops and camp sites shall be captured and treated before being discharged into the drainage system in line with applicable government water pollution control regulations.

8. Used oil from maintenance shall be collected and disposed of appropriately at designated sites or be re-used or sold for re-use locally.

9. Entry of runoff to the site shall be restricted by constructing diversion channels or holding structures such as banks, drains, dams, etc. to reduce the potential of soil erosion and water pollution.

10. Maintenance/maintenance waste shall not be left in stockpiles along the road but removed and reused or disposed of on a daily basis.

11. If disposal sites for clean spoil are necessary, they shall be located in areas, approved by the SE, of low land use value and where they will not result in material being easily washed into drainage channels. Whenever possible, spoil materials should be placed in low-lying areas and should be compacted and planted with species indigenous to the locality.

#### Material Excavation and Deposit

12. The Contractor shall obtain appropriate licenses/permits from relevant authorities to operate quarries or borrow areas.

13. The location of quarries and borrow areas shall be subject to approval by relevant local and national authorities, including traditional authorities if the land on which the quarry or borrow areas fall in traditional land.

14. New extraction sites:

a) Shall not be located in the vicinity of settlement areas, cultural sites, wetlands or any other valued ecosystem component, or on high or steep ground or in areas of high scenic value and shall not be located less than 1km from such areas.

b) Shall not be located adjacent to stream channels wherever possible to avoid siltation of river channels. Where they are located near water sources, borrow pits and perimeter drains shall surround quarry sites.

c) Shall not be located in archaeological areas. Excavations in the vicinity of such areas shall proceed with great care and shall be done in the presence of government authorities having a mandate for their protection.

d) Shall not be located in forest reserves. However, where there are no other alternatives, permission shall be obtained from the appropriate authorities and an environmental impact study shall be conducted.

e) Shall be easily rehabilitated. Areas with minimal vegetation cover such as flat and bare ground, or areas covered with grass only or covered with shrubs less than 1.5m in height, are preferred.

f) Shall have clearly demarcated and marked boundaries to minimize vegetation clearing.

15. Vegetation clearing shall be restricted to the area required for safe operation of Maintenance work. Vegetation clearing shall not be done more than two months in advance of operations.

16. Stockpile areas shall be located in areas where trees can act as buffers to prevent dust pollution. Perimeter drains shall be built around stockpile areas. Sediment and other pollutant traps shall be located at drainage exits from workings.

17. The Contractor shall deposit any excess material in accordance with the principles of the general conditions, and any applicable EMP, in areas approved by local authorities and/or the SE.

18. Areas for depositing hazardous materials such as contaminated liquid and solid materials shall be approved by the SE and appropriate local and/or national authorities before the commencement of work. Use of existing, approved sites shall be preferred over the establishment of new sites.

#### Rehabilitation and Soil Erosion Prevention

19. To the extent practicable, the Contractor shall rehabilitate the site progressively so that the rate of rehabilitation is similar to the rate of maintenance.

20. Always remove and retain topsoil for subsequent rehabilitation. Soils shall not be stripped when they are wet as this can lead to soil compaction and loss of structure.

21. Topsoil shall not be stored in large heaps. Low mounds of no more than 1 to 2m high are recommended.
22. Re-vegetate stockpiles to protect the soil from erosion, discourage weeds and maintain an active population of beneficial soil microbes.
23. Locate stockpiles where they will not be disturbed by future maintenance/Maintenance activities.
24. To the extent practicable, reinstate natural drainage patterns where they have been altered or impaired.
25. Remove toxic materials and dispose of them in designated sites. Backfill excavated areas with soils or overburden that is free of foreign material that could pollute groundwater and soil.
26. Identify potentially toxic overburden and screen with suitable material to prevent mobilization of toxins.
27. Ensure reshaped land is formed so as to be inherently stable, adequately drained and suitable for the desired long-term land use and allow natural regeneration of vegetation.
28. Minimize the long-term visual impact by creating landforms that are compatible with the adjacent landscape.
29. Minimize erosion by wind and water both during and after the process of reinstatement.
30. Compacted surfaces shall be deep ripped to relieve compaction unless subsurface conditions dictate otherwise.
31. Re-vegetate with plant species that will control erosion, provide vegetative diversity and, through succession, contribute to a resilient ecosystem. The choice of plant species for rehabilitation shall be done in consultation with local research institutions, forest department and the local people.

#### Water Resources Management

32. The Contractor shall at all costs avoid conflicting with water demands of local communities.
33. Abstraction of both surface and underground water shall only be done with the consultation of the local community and after obtaining a permit from the relevant Water Authority.34. Abstraction of water from wetlands shall be avoided. Where necessary, authority has to be obtained from relevant authorities.
35. Temporary damming of streams and rivers shall be done in such a way avoids disrupting water supplies to communities downstream and maintains the ecological balance of the river system.
36. No maintenance/Maintenance water containing spoils or site effluent, especially cement and oil, shall be allowed to flow into natural water drainage courses.
37. Wash water from washing out of equipment shall not be discharged into water courses or road drains.
38. Site spoils and temporary stockpiles shall be located away from the drainage system, and surface run off shall be directed away from stockpiles to prevent erosion.

#### Traffic Management

39. Location of access roads/detours shall be done in consultation with the local community especially in important or sensitive environments. Access roads shall not traverse wetland areas.
40. Upon the completion of civil works, all access roads shall be ripped and rehabilitated.
41. Access roads shall be sprinkled with water at least five times a day in settled areas, and three times in unsettled areas, to suppress dust emissions.

#### Blasting

42. Blasting activities shall not take place less than 2km from settlement areas, cultural sites, or wetlands without the permission of the SE.
43. Blasting activities shall be done during working hours, and local communities shall be consulted on the proposed blasting times.
44. Noise levels reaching the communities from blasting activities shall not exceed 90 decibels.

#### Disposal of Unusable Elements

45. Unusable materials and Maintenance elements such as electro-mechanical equipment, pipes, accessories and demolished structures will be disposed of in a manner approved by the SE. The Contractor has to agree with the SE, which elements are to be surrendered to the Client's premises, which will be recycled or reused, and which will be disposed of at approved landfill sites.
46. As far as possible, abandoned pipelines shall remain in place. Where for any reason no alternative alignment for the new pipeline is possible, the old pipes shall be safely removed and stored at a safe place to be agreed upon with the SE and the local authorities concerned.

47. AC-pipes as well as broken parts thereof have to be treated as hazardous material and disposed of as specified above.

48. Unsuitable and demolished elements shall be dismantled to a size fitting on ordinary trucks for transport.

#### Health and Safety

49. In advance of the maintenance/Maintenance work, the Contractor shall mount an awareness and hygiene campaign. Workers and local residents shall be sensitized on health risks particularly of Cholera, tetanus and Hepatitis.

50. Adequate road signs to warn pedestrians and motorists of maintenance/Maintenance activities, diversions, etc. shall be provided at appropriate points.

51. Maintenance/Maintenance vehicles shall not exceed maximum speed limit of 40km per hour.

#### Repair of Private Property

52. Should the Contractor, deliberately or accidentally, damage private property, he shall repair the property to the owner's satisfaction and at his own cost. For each repair, the Contractor shall obtain from the owner a certificate that the damage has been made good satisfactorily in order to indemnify the Client from subsequent claims.

53. In cases where compensation for inconveniences, damage of crops etc. are claimed by the owner, the Client has to be informed by the Contractor through the SE. This compensation is in general settled under the responsibility of the Client before signing the Contract. In unforeseeable cases, the respective administrative entities of the Client will take care of compensation.

#### Contractor's Environment, Health and Safety Management Plan (EHS-MP)

54. Within 6 weeks of signing the Contract, the Contractor shall prepare an EHS-MP to ensure the adequate management of the health, safety, environmental and social aspects of the works, including implementation of the requirements of these general conditions and any specific requirements of an EMP for the works. The Contractor's EHS-MP will serve two main purposes:

For the Contractor, for internal purposes, to ensure that all measures are in place for adequate EHS management, and as an operational manual for his staff.

For the Client, supported where necessary by a SE, to ensure that the Contractor is fully prepared for the adequate management of the EHS aspects of the project, and as a basis for monitoring of the Contractor's EHS performance.

55. The Contractor's EHS-MP shall provide at least:

a description of procedures and methods for complying with these general environmental management conditions, and any specific conditions specified in an EMP;

a description of specific mitigation measures that will be implemented in order to minimize adverse impacts;

a description of all planned monitoring activities (e.g. sediment discharges from borrow areas) and the reporting thereof; and

the internal organizational, management and reporting mechanisms put in place for such.

56. The Contractor's EHS-MP will be reviewed and approved by the Client before start of the works. This review should demonstrate if the Contractor's EHS-MP covers all of the identified impacts and has defined appropriate measures to counteract any potential impacts.

#### EHS Reporting

57. The Contractor shall prepare bi-weekly progress reports to the SE on compliance with these general conditions, the project EMP if any, and his own EHS-MP. An example format for a Contractor EHS report is given below. It is expected that the Contractor's reports will include information on:

EHS management actions/measures taken, including approvals sought from local or national authorities; Problems encountered in relation to EHS aspects (incidents, including delays, cost consequences, etc. as a result thereof);

Lack of compliance with contract requirements on the part of the Contractor;

Changes of assumptions, conditions, measures, designs and actual works in relation to EHS aspects; and

Observations, concerns raised and/or decisions taken with regard to EHS management during site meetings.

#### Training of Contractor's Personnel

58. The Contractor shall provide sufficient training to his own personnel to ensure that they are all aware of the relevant aspects of these general conditions, any project EMP, and his own EHS-MP, and are able to fulfil their expected roles and functions. Specific training should be provided to those

employees that have particular responsibilities associated with the implementation of the EHS-MP.

General topics should be:

EHS in general (working procedures);

Emergency procedures; and

Social and cultural aspects (raise awareness on social issues).

Cost of Compliance

59. It is expected that compliance with these conditions is already part of standard good workmanship and state of art as generally required under this Contract. The item "Compliance with Environmental Management Conditions" in the Bill of Quantities covers this cost. No other payments will be made to the Contractor for compliance with any request to avoid and/or mitigate an avoidable EHS impact.

## **Annex 5 – COVID 19 Guidelines**

### Some of the COVID-19 guidelines are:

This generic guidance provides a guide for this project on adequate precautions to prevent and/or minimize an outbreak of COVID 19, and actions to take in the event of such an outbreak.

Suggestions on how to do this are set out below:

- The PIU, either directly or through the Supervising Engineer, should request details in writing from the main Contractor of the measures being taken to manage covid-19 related risks.
- The PIU should require the Contractor to convene regular meetings with the project health and safety specialists and medical staff (and where appropriate the local health authorities), and to take their advice in designing and implementing any agreed measures.
- Where possible, a senior person should be identified as a focal point to deal with COVID-19 issues. This can be a work supervisor or a health and safety specialist. This person can be responsible for coordinating preparation of the site and making sure that the measures taken are communicated to the workers, those entering the site and the local community. It is also advisable to designate at least one back-up person; in case the focal point becomes ill; that person should be aware of the arrangements that are in place.

Workers should be encouraged to use the existing project grievance mechanism to report concerns relating to COVID-19, preparations being made by the project.

These guidelines will be communicated to general labour workforce during staff trainings & toolbox meetings to ensure that all employees are aware of steps to take regarding COVID-19.

### **Protect yourself and those around you:**

- Keep physical distance of at least 1 metre from others, even if they don't appear to be sick. Avoid crowds and close contact.
- Wear a properly fitted mask when physical distancing is not possible and in poorly ventilated settings.
- Clean your hands frequently with alcohol-based hand rub or soap and water.
- Cover your mouth and nose with a bent elbow or tissue when you cough or sneeze. Dispose of used tissues immediately and clean hands regularly.
- If you develop symptoms or test positive for COVID-19, self-isolate until you recover.

### **Make your environment safer**

The risks of getting COVID-19 are higher in crowded and inadequately ventilated spaces where infected people spend long periods of time together in close proximity.

Outbreaks have been reported in places where people have gathered, often in crowded indoor settings and where they talk loudly, shout, breathe heavily or sing such as restaurants, choir practices, fitness classes, nightclubs, offices and places of worship.

To make your environment as safe as possible:

- Avoid the 3Cs: spaces that are **c**losed, **c**rowded or involve **c**lose contact.
- Meet people outside. Outdoor gatherings are safer than indoor ones, particularly if indoor spaces are small and without outdoor air coming in.
- If you can't avoid crowded or indoor settings, take these precautions:
  - Open a window to increase the amount of natural ventilation when indoors.
  - Wear a mask (see above for more details).

### **Keep good hygiene**

By following good respiratory hygiene, you protect the people around you from viruses that cause colds, flu and COVID-19.

To ensure good hygiene you should:

- Regularly and thoroughly clean your hands with either an alcohol-based hand rub or soap and water. This eliminates germs that may be on your hands, including viruses.
- Cover your mouth and nose with your bent elbow or a tissue when you cough or sneeze. Dispose of the used tissue immediately into a closed bin and wash your hands.
- Clean and disinfect surfaces frequently, especially those which are regularly touched, such as door handles, faucets and phone screens.

**What to do if you feel unwell**

If you feel unwell, here's what to do.

- If you have a fever, cough and difficulty breathing, seek medical attention immediately. Call by telephone first and follow the directions of your local health authority.
- Know the full range of symptoms of COVID-19. The most common symptoms of COVID-19 are fever, dry cough, tiredness and loss of taste or smell. Less common symptoms include aches and pains, headache, sore throat, red or irritated eyes, diarrhoea, a skin rash or discoloration of fingers or toes.
- Stay home and self-isolate for 10 days from symptom onset, plus three days after symptoms cease. Call your health care provider or hotline for advice. Have someone bring you supplies. If you need to leave your house or have someone near you, wear a properly fitted mask to avoid infecting others.
- Keep up to date on the latest information from trusted sources, such as WHO or your local and national health authorities. Local and national authorities and public health units are best placed to advise on what people in your area should be doing to protect themselves.



## Annex 6 – Pictures of Stakeholder Meetings



Consultation meeting with Permanent Secretary Women Affairs AKS



Consultation meetings with Women in Ministry of Environment



Consultation meeting with Permanent Secretary Environment AKS



Consultation meetings with Ministry of Agric

## **Annex 7: Company Code of Conduct on Preventing Gender Based Violence and Violence Against Children (VAC)**

The company is committed to creating and maintaining an environment in which gender-based violence (GBV) and violence against children (VAC) have no place, and where they will not be tolerated by any employee, associate, or representative of the company. Therefore, in order to ensure that all those engaged in the project are aware of this commitment, and in order to prevent, be aware of, and respond to any allegations of GBV and VAC, the company commits to the following core principles and minimum standards of behavior that will apply to all company employees, associates, and representatives including sub-contractors, without exception:

1. The company—and therefore all employees, associates, and representatives—commit to treating women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status. Acts of GBV and VAC are in violation of this commitment.
2. Demeaning, threatening, harassing, abusive, culturally inappropriate, or sexually provocative language and behavior are prohibited among all company employees, associates, and its representatives.
3. Acts of GBV or VAC constitute gross misconduct and are therefore grounds for sanctions, which may include penalties and/or termination of employment. All forms of GBV and VAC, including grooming are unacceptable, regardless of whether they take place on the work site, the work site surroundings, at worker's camps or at worker's homes.
4. In addition to company sanctions, legal prosecution of those who commit acts of GBV or VAC will be pursued if appropriate.
5. Sexual contact or activity with children under 18—including through digital media—is prohibited. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
6. Sexual favors—for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior are prohibited.
7. Unless there is full consent<sup>18</sup> by all parties involved in the sexual act, sexual interactions between the company's employees (at any level) and members of the communities surrounding the work place are prohibited. This includes relationships involving the withholding/promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
8. All employees, including volunteers and sub-contractors are highly encouraged to report suspected or actual acts of GBV and/or VAC by a fellow worker, whether in the same company or not. Reports must be made in accordance with GBV and VAC Allegation Procedures.
9. Managers are required to report suspected or actual acts of GBV and/or VAC as they have a responsibility to uphold company commitments and hold their direct reports responsible.

To ensure that the above principles are implemented effectively the company commits to ensuring that:

10. All managers sign the 'Manager's Code of Conduct' detailing their responsibilities for implementing the company's commitments and enforcing the responsibilities in the 'Individual Code of Conduct'.
11. All employees sign the project's 'Individual Code of Conduct' confirming their agreement not to engage in activities resulting in GBV or VAC.
12. Displaying the Company and Individual Codes of Conduct prominently and in clear view at workers' camps, offices, and in public areas of the work space. Examples of areas include waiting, rest and lobby areas of sites, canteen areas, health clinics.
13. Ensure that posted and distributed copies of the Company and Individual Codes of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.
14. An appropriate person is nominated as the company's 'Focal Point' for addressing GBV and VAC issues, including representing the company on the GBV and VAC Compliance Team (GCCT) which

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<sup>18</sup> **Consent** is defined as the informed choice underlying an individual's free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained through the use of threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even in the event that national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

is comprised of representatives from the client, contractor(s), the supervision consultant, and local service provider(s).

15. Ensuring that an effective Action Plan is developed in consultation with the GCCT which includes as a minimum:
  - a. **GBV and VAC Allegation Procedure** to report GBV and VAC issues through the project Grievance Redress Mechanism (GRM);
  - b. **Accountability Measures** to protect confidentiality of all involved; and,
  - c. **Response Protocol** applicable to GBV and VAC survivors and perpetrators.
16. That the company effectively implements the Action Plan, providing feedback to the GCCT for improvements and updates as appropriate.
17. All employees attend an induction training course prior to commencing work on site to ensure they are familiar with the company's commitments and the project's GBV and VAC Codes of Conduct.
18. All employees attend a mandatory training course once a month for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the project's GBV and VAC Code of Conduct.

*I do hereby acknowledge that I have read the foregoing Company Code of Conduct, and on behalf of the company agree to comply with the standards contained therein. I understand my role and responsibilities to prevent and respond to GBV and VAC. I understand that any action inconsistent with this Company Code of Conduct or failure to take action mandated by this Company Code of Conduct may result in disciplinary action.*

Company name: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Printed Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Date: \_\_\_\_\_

## **Annex 8: Manager's Code of Conduct on Preventing Gender Based Violence and Violence Against Children**

Managers at all levels have particular responsibilities to uphold the company's commitment to preventing and addressing GBV and VAC. This means that managers have an acute responsibility to create and maintain an environment that prevents GBV and VAC. Managers need to support and promote the implementation of the Company Code of Conduct. To that end, managers must adhere this Manager's Code of Conduct and also sign the Individual Code of Conduct. This commits them to supporting and developing systems that facilitate the implementation of the Action Plan and maintain a GBV-free and VAC-free environment at the workplace and in the local community. These responsibilities include but are not limited to:

### **Implementation**

1. To ensure maximum effectiveness of the Company and Individual Codes of Conduct:
  - a. Prominently displaying the Company and Individual Codes of Conduct in clear view at workers' camps, offices, and in public areas of the work space. Examples of areas include waiting, rest and lobby areas of sites, canteen areas, health clinics.
  - b. Ensuring all posted and distributed copies of the Company and Individual Codes of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.
2. Verbally and in writing explain the Company and Individual Codes of Conduct to all staff.
3. Ensure that:
  - a. All direct reports sign the 'Individual Code of Conduct', including acknowledgment that they have read and agree with the Code of Conduct.
  - b. Staff lists and signed copies of the Individual Code of Conduct are provided to the GCCT and the client.
  - c. Participate in training and ensure that staff also participate as outlined below.
  - d. Staff are familiar with the Grievance Redress Mechanism (GRM) and that they can use it to anonymously report concerns of GBV or VAC incidents.
  - e. Staff are encouraged to report suspected or actual GBV or VAC through the GRM by raising awareness about GBV and VAC issues, emphasizing the staff's responsibility to the Company and the country hosting their employment, and emphasizing the respect for confidentiality.
4. In compliance with applicable laws and to the best of your abilities, prevent perpetrators of sexual exploitation and abuse from being hired, re-hired or deployed. Use background and criminal reference checks for all employees.
5. Ensure that when engaging in partnership, sub-contractor or similar agreements, these agreements:
  - a. Incorporate the GBV and VAC Codes of Conduct as an attachment.
  - b. Include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers, to comply with the Individual Codes of Conduct.
  - c. Expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against GBV and VAC, to investigate allegations thereof, or to take corrective actions when GBV or VAC has occurred, shall constitute grounds for sanctions and penalties in accordance with the Individual Codes of Conduct.
6. Provide support and resources to the GCCT to create and disseminate internal sensitization initiatives through the awareness-raising strategy under the Action Plan.
7. Ensure that any GBV or VAC issue warranting police action is reported to the client and the World Bank immediately.

### **Training**

8. All managers are required to attend an induction manager training course prior to commencing work on site to ensure that they are familiar with their roles and responsibilities in upholding the GBV and VAC Codes of Conduct. This training will be separate from the induction training course required of all employees and will provide managers with the necessary understanding and technical support needed to begin to develop the Action Plan for addressing GBV and VAC issues.

9. Ensure that time is provided during work hours and that staff attend the mandatory project facilitated induction training on GBV and VAC required of all employees prior to commencing work on site.
10. Ensure that staff attend the monthly mandatory refresher training course required of all employees to combat increased risk of GBV and VAC during civil works.
11. Managers are required to attend and assist with the project facilitated monthly training courses for all employees. Managers will be required to introduce the trainings and announce the self-evaluations.
12. Collect satisfaction surveys to evaluate training experiences and provide advice on improving the effectiveness of training.

**Response**

13. Managers will be required to provide input to the GBV and VAC Allegation Procedures and Response Protocol developed by the GCCT as part of the final cleared Action Plan.
14. Once adopted by the Company, managers will uphold the Accountability Measures set forth in the Action Plan to maintain the confidentiality of all employees who report or (allegedly) perpetrate incidences of GBV and VAC (unless a breach of confidentiality is required to protect persons or property from serious harm or where required by law).
15. If a manager develops concerns or suspicions regarding any form of GBV or VAC by one of his/her direct reports, or by an employee working for another contractor on the same work site, s/he is required to report the case using the GRM.
16. Once a sanction has been determined, the relevant manager(s) is/are expected to be personally responsible for ensuring that the measure is effectively enforced, within a maximum timeframe of 14 days from the date on which the decision to sanction was made.
17. Managers failing to report or comply with such provision can in turn be subject to disciplinary measures, to be determined and enacted by the company's CEO, Managing Director or equivalent highest-ranking manager. Those measures may include:
  - a. Informal warning.
  - b. Formal warning.
  - c. Additional Training.
  - d. Loss of up to one week's salary.
  - e. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
  - f. Termination of employment.

Ultimately, failure to effectively respond to GBV and VAC cases on the work site by the company's managers or CEO may provide grounds for legal actions by authorities.

*I do hereby acknowledge that I have read the foregoing Manager's Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to GBV and VAC. I understand that any action inconsistent with this Manager's Code of Conduct or failure to take action mandated by this Manager's Code of Conduct may result in disciplinary action.*

Signature: \_\_\_\_\_  
 Printed Name: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Date: \_\_\_\_\_

## **Annex 9: Individual Code of Conduct on Preventing Gender Based Violence and Violence Against Children**

I, \_\_\_\_\_, acknowledge that preventing gender-based violence (GBV) and violence against children (VAC) is important. The company considers that GBV or VAC activities constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. All forms of GBV or VAC are unacceptable be it on the work site, the work site surroundings, or at worker's camps. Prosecution of those who commit GBV or VAC may be pursued if appropriate.

I agree that while working on the project I will:

- Consent to police background check.
- Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not participate in sexual contact or activity with children—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
- Not engage in sexual favors—for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.
- Unless there is the full consent<sup>19</sup> by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code. Attend and actively partake in training courses related to HIV/AIDS, GBV and VAC as requested by my employer.
- Consider reporting through the GRM or to my manager any suspected or actual GBV or VAC by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

With regard to children under the age of 18:

- Wherever possible, ensure that another adult is present when working in the proximity of children.
- Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.
- Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible.
- Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any medium (see also “Use of children's images for work related purposes” below).
- Refrain from physical punishment or discipline of children.
- Refrain from hiring children for domestic or other labor which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.
- Comply with all relevant local legislation, including labor laws in relation to child labor.

### **Use of children's images for work related purposes**

When photographing or filming a child for work related purposes, I must:

- Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.

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<sup>19</sup> **Consent** is defined as the informed choice underlying an individual's free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained through the use of threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even in the event that national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

- Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
- Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and the facts.
- Ensure file labels do not reveal identifying information about a child when sending images electronically.

### **Sanctions**

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

- Informal warning.
- Formal warning.
- Additional Training.
- Loss of up to one week's salary.
- Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
- Termination of employment.
- Report to the police if warranted.

*I understand that it is my responsibility to avoid actions or behaviours that could be construed as GBV or VAC or breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to GBV and VAC. I understand that any action inconsistent with this Individual Code of Conduct or failure to take action mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.*

Signature: \_\_\_\_\_  
Printed Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Date: \_\_\_\_\_

## **Annex 10: CODE OF CONDUCT FOR CONTRACTOR STAFF**

### IMPLEMENTATION OF ENVIRONMENTAL, SOCIAL, HEALTH AND SAFETY (ESHS) REQUIREMENTS OF CIVIL WORKS

#### FOR INDIVIDUAL EMPLOYEE

I, \_\_\_\_\_ (name of employee), mitigating the environmental and social risks of the activities of the firm in the immediate project influence area in an integral component of my work responsibilities. Deliberate acts of non-compliance constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or termination of employment. All forms of non-compliance to ESHS are unacceptable either on the work site, neighbouring project communities, or at worker's camps.

Specifically, I agree that while working projects on funded under the NFWP-SU, I will:

Maintain conflict-free relationships with residents of project areas when such relationships and interactions become necessary.

Study and understand all documents that have been prepared by the client and the contractor firm addressing the environmental and social impacts of construction and construction-related activities

Attend all scheduled ESHS trainings and meetings including induction/kick-off trainings, toolbox talk meetings, refresher trainings etc.

Attend and actively partake in training courses related to HIV/AIDS, GBV and CAE as requested by my employer.

Comply with all ESHS site instructions provided by supervising engineer and contractor staff

Report all accidents and incidents to site manager within 1 hour of occurrence by conventional or electronic means

Provide information of the risk of coming within the proximity of areas where injurious activities are taking place of such potential for injuries

Ensure that work areas (for which I have responsibility) are properly cordoned off and inaccessible to unprotected persons

Ensure the use of Personal Protective Equipment (PPE) related to each level of construction works that I may be involved with at all times

Treat women, children (persons under the age of 18), and men with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.

Not use language or behaviour towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.

Report through the GRM or to my manager every conflict or disagreement with other workers, or community residents.

Specifically, with regard to Sexual relations, I also covenant as follows:

Not participate in sexual activity with children—including grooming or through digital media. Mistaken belief regarding the age of a child and consent from the child is not a defence.

Not engage in sexual favours or other forms of humiliating, degrading or exploitative behaviour.

Not have sexual interactions with members of the communities surrounding the workplace and worker's camps that are not agreed to with full consent by all parties involved in the sexual act. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.

Wherever possible, ensure that another adult is present when working in the proximity of children.

Not invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger.

Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible.

Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any medium (see also “Use of children's images for work related purposes”).

Refrain from physical punishment or discipline of children.



Refrain from hiring children for domestic or other labor which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.

Comply with all relevant local legislation, including labour laws in relation to child labour.

I understand that it is my responsibility to use common sense and avoid actions or behaviour that could be construed as GBV or CAE or breach this code of conduct. I do hereby acknowledge that I have read the foregoing Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to GBV and CAE. I understand that any action inconsistent with this Code of Conduct or failure to take action mandated by this Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signed by \_\_\_\_\_  
(Employee)

Signed by \_\_\_\_\_  
(Employer/Manager)

Title: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

## **Annex 11: Labour Management Plan (LMP)**

This has been prepared as a document accompanying this ESMF.

**Annex 12: Template for Occupation Health and Safety Management Plan**

<b>PURPOSE</b>	The purpose of this document is to describe the Project Occupational Health and Safety (OHS) plan for the proposed project and the specific management controls, risk control systems and workplace and E&S standards compliance required to ensure compliance with Occupational Health and Safety Laws and Standards.
<b>SCOPE</b>	The Project Occupational Health and Safety (OHS) plan covers the scope of works defined in the contract. This includes Preconstruction, Construction, Operation & Maintenance and Decommissioning phases.
<b>OBJECTIVES OF THE PLAN</b>	<ul style="list-style-type: none"> <li>• Adopt a positive Health &amp; Safety Culture.</li> <li>• Adopt the principles of prevention to avoid risk.</li> </ul> <p>Complete the project without incident (Zero fatalities, Zero Lost Time Injury (LTI) or occupational illness).</p>
<b>OBLIGATIONS</b>	<ul style="list-style-type: none"> <li>• Participation of all personnel and the management in executing, maintaining and continually improving OHS processes is vital to the successful completion and achievement of quality objectives set by the management.</li> <li>• All project personnel shall therefore be required to be familiar with the content of the OHS plan and shall participate in implementing, maintaining and improving the management system</li> <li>• It is the responsibility of the project manager and all key personnel to ensure that the requirements for quality are fulfilled for works under their responsibility.</li> </ul> <p>All new staff and staff who are given new responsibilities are to be inducted into the requirements set out in the plan in general and into their function and responsibilities in particular</p>
<b>POLICIES</b>	<ul style="list-style-type: none"> <li>• Workplace Health and Safety: all worker shall adhere to all workplace health and safety rules and the management will ensure the safety of the workers on site.</li> <li>• Rehabilitation Policy</li> <li>• Drug and Alcohol Policy: Prohibiting the consumption or possession of narcotics, drugs, alcohol and other banned substances</li> </ul>
<b>DUTIES AND RESPONSIBILITIES</b>	<p><b>Safety Officer Responsibilities include:</b></p> <ul style="list-style-type: none"> <li>• Main communication link between their department and Site superintendent and Project Manager.</li> <li>• Facilitate daily toolbox meetings</li> <li>• Review daily work to be assigned to workers to ensure full Job Hazard Analysis requirements</li> <li>• Review all worker completed Job Hazard Analysis (JHA) prior to work being started</li> <li>• Develop SOP from completed and approved JHA when required.</li> <li>• Inspect all work areas on a daily basis. .</li> <li>• Respond immediately to all unsafe conditions.</li> <li>• Control of and distribution of all worker personal protective equipment.</li> <li>• Ensure deficiencies are corrected and reported to site manager.</li> <li>• Complete all incident/Non-conformance reports as required</li> <li>• Complete all orientation of all new or transferred employees.</li> <li>• Ensure that all required training is given or made available to all employees</li> </ul> <p><b>Workers roles and responsibilities for Health and Safety</b></p> <ul style="list-style-type: none"> <li>• Carry out their work in a manner that will not create a hazard to the health and safety of self or other employees.</li> <li>• Have the right to refuse unsafe work and report all job specific hazards to their supervisor.</li> <li>• Take care, an active role in the elimination and control of workplace hazards.</li> <li>• Assist site supervisors in reducing and controlling accident producing conditions and unsafe acts on the work sites.</li> <li>• Report any accidents/incidents, near misses and/or injuries immediately to the supervisor.</li> <li>• Report any anticipated loss of work time to the supervisor as soon as possible after being treated by a physician following injury.</li> <li>• Attend morning toolbox meetings and playing an active role in the meeting in discussing possible job site hazards.</li> </ul>

	<ul style="list-style-type: none"> <li>• Providing suggestions to improve the overall health and safety program.</li> <li>• Using all safe guards and safety equipment provided.</li> <li>• Participating as required, in accident/incident investigations and assisting in the completing of the accident/incident forms.</li> <li>• Ensure co- workers are advised of unsafe conditions or acts that may cause injury or illness.</li> <li>• Demonstrate a professional attitude towards all projects HS&amp;E efforts.</li> </ul>
<b>COMMUNICATION RESOURCES</b>	This may include: project management meetings; inductions; training; and outcomes from inspections
<b>Rules for Safety Outline the rules relating to workplace safety.</b>	<p><b>BEHAVIOR:</b> Every worker shall keep his/her work area neat, clean and orderly, Consuming or being in possession of or under the influence of alcohol or illegal drugs on project site and environs premises, is prohibited and disciplinary action will be taken. Fighting, horseplay, practical jokes or otherwise interfering with other workers is prohibited and disciplinary action will be taken. Theft, vandalism or any other abuse or misuse of equipment is prohibited and may be cause for immediate dismissal. Smoking is permitted only in designated areas. "Strike Anywhere" matches are prohibited. Running is not permitted anywhere, except in the case of extreme emergency. Riding on any hook, hoist or other material handling equipment which is used strictly for handling material and not specifically designated to carry riders is prohibited</p> <p><b>First Aid and Injury Management Emergency Procedures</b></p> <ol style="list-style-type: none"> <li>Render first aid immediately, first aid kits should be made available in all vehicles and job shacks. All serious first aid injuries should be attended to by a trained first aid attendant only.</li> <li>For all serious injuries, these general directions should be followed: <ul style="list-style-type: none"> <li>• If you do not have first aid training send or locate a trained first aid attendant immediately</li> <li>• Apply artificial respiration if the patient is not breathing (by trained first aid attendants only)</li> <li>• Stop any severe bleeding, by applying pressure to the immediate wound area</li> <li>• Send someone for a doctor</li> <li>• Keep victim lying down: never move injured personnel unless the potential for further injury is immediately present</li> </ul> </li> <li>Stay calm. If the patient is breathing and no artery is spurting blood, giving first aid is usually unnecessary, and is often harmful</li> <li>Do not attempt to remove foreign objects from eyes or any other part of the body or allow anyone else to do so, except a first aid attendant or a doctor</li> <li>Call for assistance; be ready to give the following information: <ul style="list-style-type: none"> <li>• Accurate directions to the location of the injured person.</li> <li>• Nature of the injury.</li> <li>• Any assistance that may be required. <ul style="list-style-type: none"> <li>• Give information slowly and clearly.</li> <li>• Report back to the scene of the accident; report to the superintendent or first aid attendant that help is on the way.</li> </ul> </li> </ul> </li> </ol> <p>If no one can be contacted at the office call/Inform operator which of the following is required:</p> <ol style="list-style-type: none"> <li>Ambulance.</li> <li>Police.</li> <li>Fire Department.</li> <li>Electrical Power Company.</li> <li>Gas utility company.</li> <li>Hospital.</li> </ol> <ul style="list-style-type: none"> <li>• Restrict the immediate area of the accident, check if further danger exists; Clear the area Maintenance, Layout, Storage areas, Manual handling Use of workplace equipment Evacuation procedures</li> </ul>

	<p>Fire alarm response: A fire safety plan shall be in place in the site. A fire risk assessment shall be developed and recorded.</p> <p>Security</p>
<p><b>Training of Contractor's Personnel</b></p>	<p>The Contractor shall provide sufficient training to his own personnel to ensure that they are all aware of the relevant aspects of these general conditions, any project ESMP, and his own HSES-MP, and are able to fulfil their expected roles and functions. Specific training should be provided to those employees that have particular responsibilities associated with the implementation of the HSES-MP.</p>
<p><b>General topics should be:</b> HSES in general (working procedures), emergency procedures, and social and cultural aspects (awareness raising on social issues).</p>	

**TABLE 1 - SUMMARY OF THE TRAFFIC MANAGEMENT PLAN REQUIREMENTS**

<p><b>1,2. Project Details and Schedule</b></p>	<p><b><i>The purpose of this section is to describe the project from demolition to completion.</i></b></p> <ul style="list-style-type: none"> <li>• Describe the work to be performed (in case of multiple phases, describe each phase).</li> <li>• Define scope of area that will be affected by construction activities.</li> <li>• Describe the location and length of the proposed on-street building zone</li> <li>• Provide sequence of construction operations.</li> <li>• Describe when each phase will commence and finish.</li> <li>• Provide duration of work.</li> <li>• Note proposed hours of work activity on the site.</li> <li>• <b>Provide primary contractor’s name, address, phone number as well as the 24-hour contact for the contact person representing the Contractor /Supervising Contractor.</b></li> </ul>
<p><b>3. Mobility Impact</b></p>	<p><b><i>The purpose of this section is to describe how the project will impact road users, and what measures should be provided to mitigate these impacts.</i></b></p> <ul style="list-style-type: none"> <li>• Describe the impact of construction activities on pedestrians, disabled persons, cyclists, transit service, emergency vehicles, trucks and general-purpose traffic.</li> <li>• For each impact identified above, describe the mitigation measure(s) that are proposed to minimize inconvenience and delay.</li> <li>• Include any necessary plans to demonstrate how safety concerns for cyclist and pedestrians will be mitigated with any proposed pedestrian/cycling facilities closure. (e.g. will a dedicate network of route be available for pedestrians, cyclist (okadas) These routes are very important for cyclists and every effort should be made to allow safe passage through construction zones.</li> <li>• For construction activities that require a road closure and require that transit service and/or emergency vehicle service be rerouted, the contractor/ Supervising contractor must provide written approval from the appropriate agencies – on the proposed plan and mitigation measures.</li> <li>• Describe the number of truck trips that the site will generate on an hourly and daily basis, for each phase of construction.</li> <li>• Describe the truck route(s) that are proposed to be used to and from the site- <b>Provide an Attachment that indicates the designated truck route map.</b></li> </ul>
<p><b>4. Community Impact (Parking)</b></p>	<p><b><i>The purpose of this section is to describe how construction activities will impact parking (loss and/or increased need). The use of on-street parking to accommodate construction site needs is not appropriate, given the associated impact on residents and businesses.</i></b></p> <ul style="list-style-type: none"> <li>• For each phase of construction, provide an estimate of how many construction worker vehicles (personal vehicles) will be generated by site activity.</li> <li>• For each phase of construction, describe how the parking demand will be met.</li> <li>• If parking for construction workers cannot be provided on the project site, alternate strategies must be described in the TMP.</li> <li>• Contractor /Supervising Contractor should undertake a review of nearby public parkades and parking lots, private parking lots that may be leased, provision of a vanpool/carpool program for construction workers, shuttle van to off-site parking, etc. TMP must include how the Contractor /Supervising Contractor will ensure that construction workers will not impact public street parking.</li> <li>• Note that any expense resulting from the parking arrangements will be borne by the Contractor /Supervising Contractor</li> </ul>
<p><b>5. Work Zone Traffic Control Devices</b></p>	<ul style="list-style-type: none"> <li>• Contractor /Supervising Contractor must prepare a Traffic Control Plan (TCP) drawing. A reference to the manual will not be accepted, please provide a detail map/drawing showing all signage and spacing. The TCP must show applicable pavement markings, vertical signs, delineation devices, channelization devices and traffic control persons. The building zones, site access and wheel wash location should also be shown.</li> <li>• For projects with multiple phases, separate TCPs must be submitted for each distinct phase and it has to include all types of anticipated street closures.</li> </ul>
<p><b>6. Communication Plan</b></p>	<p><b><i>The purpose of this section is to illustrate how the Contractor /Supervising Contractor will inform stakeholders of anticipated project impacts.</i></b></p> <ul style="list-style-type: none"> <li>• Refer to Attachment 2 for detailed requirements of the Communication Plan</li> </ul>

## **Annex 13: Guidelines for the Development of Traffic Management Plans for Construction Works**

### **1.0 GENERAL INFORMATION**

As part of the environmental and social safeguard requirement under the World Bank ESS1 and the EIA Act Cap E12. LFN 2004, a Traffic Management Plan (TMP) must be developed and submitted in advance of construction work by the relevant contractor or supervising contractor. In general, a TMP is required for all projects that could have an impact on:

- **MOBILITY** - including interruptions to pedestrians, cyclists and vehicular traffic; and
- the **COMMUNITY** - including interruptions to surrounding businesses and residents from construction activity and worker parking needs.

The objective of a TMP is to provide safe passage for pedestrians, cyclists and vehicular traffic around a construction site with as little inconvenience and delay as possible and with minimal on-street parking removal.

It is strongly recommended that the contractor responsible for the submission of a TMP liaise with a traffic engineering consultant to facilitate the preparation of the report.

The TMP requirements are divided into five sections. A plan that does not include the required information per this document, and/or does not include any additional data requested by will be deemed incomplete and returned for revision and re-submittal.

If, during construction, the traffic management requirements change to reflect unanticipated construction activities, the Contractor shall submit an amendment to the TMP. The traffic management plan needs to be submitted ten working days in advance of construction works, to provide the project management in collaboration with BAY State Traffic Law Enforcement Agency) with adequate time to review the plan and for any revisions required before the plan can be accepted by the project. Failure to meet the minimum acceptable deadlines will result in a delay in issuing street use permits or/and building permit.

The Contractor /Supervising Contractor shall ensure that all construction activities are performed in accordance with the BAY state Traffic Bylaw. Any violation of the Street and Traffic Bylaw provision will be subject to a penalty as detailed in the Bylaw Notice Enforcement Bylaw.

The Contractor /Supervising Contractor shall ensure that all construction activities are performed in accordance with the approved Traffic Management Plan. The Contractor /Supervising Contractor will be responsible for a resident parking signage fee to mitigate transportation impacts occurring as a result of construction workers parking on residential streets contrary to the parking arrangement contracts outlined in TMP.

### **2.0 COMPONENTS OF A TMP**

Unless indicated otherwise, the Contractor will submit a TMP that covers the five basic components. A detailed description of the five components is provided in Table 1 below.

#### **TMP - ATTACHMENT 1 COMMUNICATION PLAN**

Upon approval of the TMP, the Communication Plan will be enacted by the Contractor /Supervising Contractor prior to the commencement of construction, at which time project information shall be provided to all stakeholders. Once this notification has been completed, a copy of the notification attached to a signed declaration by the Contractor /Supervising Contractor must be submitted to the Responsible designated Officer (a template of the notice delivery declaration is provided in Attachment 2 for your convenience).

Subsequent follow-up notices shall be provided to stakeholders at times when site activities require that normal traffic flow is disrupted. Please note that one (1) week's written notice is required prior to any traffic disruption.

The Communication Plan submitted as part of the TMP shall include:

- (1) A list or map describing affected agencies, businesses, residents and property owners that will be contacted and informed about the project.
- (2) A sample letter/notice that will be distributed to stakeholders prior to commencement of construction (a sample letter is provided in Attachment 3 for your convenience).

As per (1) above, the Contractor /Supervising Contractor shall notify affected agencies. These agencies may include among others:

- Fire Service & Rescue (**All disruptions**)
- Ministry of Transport - Engineering Development Officer (**All disruptions**)

**TMP - ATTACHMENT 2 DECLARATION OF NOTICE DELIVERY**

Project:

Copies of the attached notice were delivered on (date) to the stakeholders identified in the Communication Plan. I have provided all the appropriate businesses, residents, property owners and agencies with at least 7 days' notice.

\_\_\_\_\_  
Contractor /Supervising Contractor's signature

\_\_\_\_\_  
Date

**TMP - ATTACHMENT 3 SAMPLE NOTICE TO RESIDENTS AND BUSINESS OPERATORS**  
**Temporary Street Closure/Building Zone Location Time and Dates**

Date

Dear Residents and Business Operators:

We regret that we must close <> Street between <> & <>.

The closure is necessary to install/repair/ construct the drains/busways/ Ramps/underground utilities, road, sidewalk, landscaping, lighting etc.> adjacent to the <Address>.

The closure will be required during week day business hours from <> to <>.

During construction there will be traffic diversions, parking restrictions and road closures. The actual work site will be kept as compact and tidy as reasonably possible. The workers will cooperate with the businesses to try and minimize the impact the work will have on day-to-day business operations.

We apologize for any inconvenience the work may cause and thank you for your understanding and cooperation. Please contact the undersigned at <> or by e-mail at <> if you would like to discuss this matter in further detail.

Yours truly,

<Contractor>

cc:



## **Annex 14: Outline of Security Management Protocol**

### **A. Security Personnel Arrangements**

The section outlines arrangements for personnel that will be deployed for basic project-site protection, such as;

- (i) the project private security force (in-house or contracted) and/or
- (ii) Arrangements made with public security.

The full staffing arrangements must be detailed in this section

### **B. Physical Security Arrangements**

This section includes a description of applicable security measures to be used on all project premises including but not limited to;

- (i) security barriers, such as fences, gates, locks, guard posts,
- (ii) surveillance/electronic security systems used,
- (iii) other elements of the security management system.

### **C. Security Operating Procedures**

This section is required to provide a brief description of key security operating procedures. Key procedures should include a brief description of the following:

- Boundary Security—how security will maintain control of the project’s perimeter and channel people to access-control points.
- Access-Point Operations—the types of checks and screening for both people and vehicles at gates or other access points. This will include entry and exit searches and purpose, and who is subject to them.
- Incident Response—how security will respond to an incident and who is responsible for responding. Responses should be based on proper and proportional use of force. The role of public security, including when they are called and by whom, for example, regarding criminal activity.
- Security Patrols—what patrols check and how often.
- Travel Security—(if applicable) any special procedure for off-site travel security.
- Materials Storage and Control—(if applicable) any controls over the transport, inventory, and maintenance of storage areas for raw materials, equipment, etc. Note that these are stored in accordance with appropriate national laws and regulations and relevant good international industry practice, including the World Bank Group Environmental, Health and Safety Guidelines.
- Information and Communication—procedures for categorizing, handling, and controlling sensitive information.
- Firearms Security—project policy regarding firearms on-site, as well as the responsibilities and procedures for issuing and storing any security firearms, ammunition, and non-lethal weapons. This should include: location for storage; how weapons are properly secured during storage; records for issuance; who they may be issued to; safeguarding while in possession of the personnel; and audits.
- Special Situations – There may be instances where large-scale events (e.g., criminal activity, demonstrations, civil disorder) require interventions by public security which is not specifically associated with the project. When planning for such events or emergencies, there should be clarity on how project security (private or public) passes control over to formal public security (for example, police, military, emergency responders).

### **D. Supervision and Control**

The elements to be described in this section are;

- (i) Management Structure and Responsibility which includes overall lines of control, accountability, and supervision for the security effort.
- (ii) Definition of supervision responsibility for the daily performance of the security.
- (iii) Description of personnel with overall responsibility for security information sharing and communication. This will include;
  - a. Responsibility for Conducting Security Risk Assessments: Discuss the responsibilities for conducting risk assessments, who participates in them (e.g., senior management, community relations team, key stakeholders from communities, etc.), and what the assessments cover.
  - b. Cross-Functional Coordination: Describe interdepartmental coordination, community relations, human resources, and government relations are important partners in project

security. Outline any planning/coordination activities between security and other departments, which may range from participation in security risk assessments to weekly meetings.

#### **E. Private Security Management**

Private security's role is to provide preventive and defensive services, protecting workers, facilities, equipment, and operations wherever they are located. Private security personnel have no law enforcement authority and will not encroach on the duties, responsibilities, and prerogatives reserved for public security forces.

This section should describe the following;

- a. **Provision and Composition of the Private Security Personnel:** This will provide information on whether security personnel are direct employees or from a third-party security provider.
- b. **Contract Provisions:** Include any provisions (e.g., for uniforms and equipment).
- c. **Active Oversight of Contractor Performance:** To ensure proper performance, the project will undertake audits, assist with training, inquire into any credible allegations of abuse or wrongdoing, and monitor site performance on an ongoing basis.
- d. **Security Personnel Background Screening:** The project will perform and/or require its security provider to perform valid background checks on potential security personnel to screen for any allegations of past abuses, inappropriate use of force, or other criminal activity and wrongdoing. No individual for whom there is credible negative information from these checks will serve on the project. These checks will be documented and maintained in individual personnel records, which are subject to review by the project and during project supervision.
- e. **Security Personnel Equipment:** Describe equipment to be provided to personnel, including radios, nonlethal weapons, and any firearms and ammunition. Security personnel should only be armed if it is justified by the SECURITY RISK ASSESSMENT (SRA) is the only viable and effective mitigation measure for a clear threat.
- f. **Use of Force by Security Personnel:** The use of force by private security is only sanctioned when it is clearly for preventive and defensive purposes and in proportion to the nature and extent of the threat. When it is necessary to arm security personnel, the project will ensure that those who are armed exhibit high levels of technical and professional proficiency and clearly understand the rules for the use of force. This means being properly trained on using force effectively, proportionality, and consistent with good international practice, applicable laws and the ESSs.

#### **F. Public Security**

**Roles of Public Security Personnel Role:** Summarize the memorandum of understanding or other agreement with public security, including commitment to the project's Code of Conduct and outlining disciplinary action process. If public security personnel are assigned to the project to provide some aspects of security, then this section should describe provision of any equipment or other support, the role of the public security force, joint contingency planning, and coordination mechanisms.

#### **G. Other Considerations**

- i. Security Personnel Background Screening
- ii. Security Personnel Equipment
- iii. Security Use of Force
- iv. Security Personnel Training
- v. Procedure for handling Allegations of Misconduct against security personnel.

## **Annex 15: Environmental, Social, Health and Safety requirements**

### **Policy Statement**

The overall goal of the Environmental, Social, Health and Safety provisions of the Civil works is to ensure that all environmental and social concerns attributable to project activities are effectively addressed by the contractor.

These requirements demand that civil works are carried out to ensure that local laws and international conventions as well as Environmental and Social Policies are fully implemented to guarantee the following;

### **ESHS Performance Objectives**

The employer is committed to ensure full adherence to its commitments on sound Environmental, Social and Health impact management practices on all its projects. As an organisation, the employer insists in sound environmental and social performance by its employees, their agents and privies in fulfilling performance objectives of all applicable policies and legislations on management of environmental and social issues attributable to project interventions.

The objectives of Environmental and Social regulations of the Employer are as follows;

apply good international industry practice to protect and conserve the natural environment and to minimize unavoidable impacts;

provide and maintain a healthy and safe work environment;

protect the health and safety of local communities with particular concern for those who are vulnerable such as the elderly, disabled, minors etc;

avoid or mitigate impacts of project activities on movable or immovable objects, or other intangible assets that have cultural significance in its project areas

ensure effective offsets for temporary or permanent land take and other forms of displacement arising from restriction of access to land and means of livelihood;

ensure that terms of employment and working conditions of all workers engaged in the contract meet the requirements of the International Labour Organisation (ILO) conventions to which the employer's country is a signatory;

be intolerant of, and enforce disciplinary measures for GBV and SEA activities;

incorporate gender considerations and enabling environment where equal opportunities are provided to participate in, and benefit from, planning and development of the contract;

work respectfully with beneficiaries, relevant authorities, contractors and local communities;

encourage an environment that fosters the exchange of information, views, and ideas that is free of any fear of retaliation, and protects whistle-blowers;

minimize the risk of HIV, STIs and other communicable diseases in the course of executing the Works contract;

ensure that ESHS measures developed by the employer to mitigate adverse project impacts are well implemented and monitored accordingly.

Ensure timely and effective reporting (weekly, monthly, quarterly, terminal) of implementation and compliance actions.

### **Employer's ESHS Requirements for Works**

#### **A. Overview**

This section describes the Environmental, Social, Health and Safety (ESHS) requirements under the Works Contract. These requirements are to be implemented in accordance with site-specific Environmental and Social Management Plan (ESMP) for the works. The bidder shall prepare its bid to implement all measures necessary to avoid undesirable adverse environmental and social impacts wherever possible, restore work sites to acceptable standards, and abide by any environmental performance requirements specified in an ESMP. The bidder shall address these requirements in its ESHS Management Plans and Implementation Plans and plan to fully take into account specific site ESHS considerations. If there is failure to implement these ESHS requirements in the course of executing the works contract, the employer reserves the right to arrange through the Engineer for execution of the missing action by a third party on account of the Contractor.

## **B. Pre-Bid Environment, Social, Health & Safety Considerations**

Prior to bid preparation, the bidder is expected to assess the Environment; Health & Safety plan specific to the requirements for the Work being bided for, taking into account the size and nature of the project as well as the nature and extent of potential Environmental, Social Health and Safety risks.

The Company's assessment must include:

A "**Hazard Assessment**" of potential hazards associated with the Projects being bided for and formulated prevention control measures to address the identified hazards;

List of equipment and resources required to perform the work in a manner that fulfils ESHS requirements of the works;

Qualifications of Employees with the knowledge and skills to be used in performing the work in line with ESHS requirements;

An understanding of the obligations expected of the Company in order to comply with the applicable Environment, Social, Health & Safety Acts, Regulations and procedures;

A planned schedule for Environment, Social, Health & Safety inspections of the contract sites and facilities;

Plan for reviewing, recording and reporting of Environment, Health & Safety related events that may arise in the Course of the Projects;

Plan for reviewing Environment, Health & Safety performance measurement activities; and

### **C.1 Minimum Environmental, Social, Health and Safety outcomes**

The bidder is expected to demonstrate capacity to produce sound ESHS results in the course of implementing the works in this contract. In general, the ESHS measures to be planned shall include, but not limited to, those which will produce the following ESHS outcomes:

1. **Reduction of Pollution Impacts:** All works must be planned and implemented to minimize the effect of dust and noxious gases on the surrounding environment resulting from earth mixing sites, asphalt mixing sites, earth moving activities etc. to ensure safety, health and the protection of workers and communities living in the vicinity of project activities. All works must be planned and implemented to minimize noise levels emanating from machinery, vehicles and noisy construction activities (e.g. excavation, blasting) for the safety, health and protection of workers within the vicinity of high noise levels and nearby communities. All works must be planned and implemented to prevent oils, lubricants and wastewater used or produced during the execution of works from entering into rivers, streams and channels

2. **Restoration of Water Flow Regimes:** All works must be planned and implemented in a manner that ensures that pre-existing water flow regimes in rivers and streams is maintained and/or re-established where they are disrupted due to works such as dredging, river training etc. to be carried out.

3. **Conservation of Natural Resources:** All works must be planned and implemented to prevent and minimize the impacts of quarrying, earth borrowing, piling and building of temporary construction camps and access roads on the biophysical environment including protected areas and arable lands; local communities and their settlements. Such impacts shall be remedied to acceptable standards. Exploitation of natural resources such as hunting, fishing, collection of forest products or any other activity that might have a negative impact on the social and economic welfare of the local communities shall be avoided.

4. **Ensure adequate Waste Management:** All works must be planned and implemented to ensure that construction and other solid waste generated on all construction sites, site yards and workers' camps are properly disposed. Sewage and wastewater from construction camps must also be satisfactorily managed through the provision of proper sanitation facilities on all premises under the works contract

5. **Reduce impact of construction activities on vehicular traffic, pedestrian movement and access within project corridors:** All works must be planned and implemented to offset temporary disruptions to vehicular traffic and human movement. Temporary access facilities (roads, footbridges) shall be done in consultation with the local community especially in important or sensitive environments. They shall also be optimized to guarantee safety and protect users from freak accidents. Traffic management shall be inclusive of all relevant communal, local, state and federal institutions.

6. **Ensure safety of workers and community residents:** All works must be planned and implemented in a way that protects workers and residents of project areas from adverse impacts on their health and wellness. Work areas shall be cordoned off to prevent freak accidents. Workers shall use personal protective equipment such as safety boots, reflective jackets etc. Adequate road signs to warn pedestrians and motorists of construction activities, diversions, etc. shall be provided at appropriate points.

7. **Community Health and Safety:** All works must be planned and implemented in a way that guarantees the control of the spread of communicable diseases attributable to project staff: Workers and local residents shall be sensitized on health risks particularly of AIDS. Stagnant water in uncovered borrow pits shall be treated in the best way to avoid creating possible breeding grounds for mosquitoes, Work yards shall be organized in a way that prevents breeding of disease vectors.

### **8. Prohibition of all Forms of Forced or Harmful Child Labour**

The Bidder shall not employ "forced or compulsory labor" in any form. "Forced or compulsory labor" consists of all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty. In the course of the works contract, the firm shall not employ any child of below eighteen years old, to perform any work that is economically exploitative, or is likely to be hazardous to, or to interfere with, the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral, or social development.

9. **Improving capacity for implementation of ESHS on Works Contract:** The Contractor shall provide sufficient training to his own personnel to ensure that they are all aware of the relevant aspects of these ESHS requirements, project ESIA/ESMP, and his own ESHS-MSIPs and are able to fulfil their expected roles and functions. Specific training should be provided to those employees that have particular responsibilities associated with the implementation of the ESHS-MSIPs.

General topics should be:

EHS in general (working procedures);

emergency procedures; and

social and cultural aspects (awareness raising on social issues)

10. **Reduction of impacts of incoming workers:** The works contract shall be planned and implemented in a way that reduces the temporary and permanent effects of incoming personnel into project beneficiary communities i.e. Labour Influx Impacts. Measures that will reduce conflict with host communities, reduce pressure on resources, reduce inflations of prices and promote social harmony will be required by the works contractor.

11. **Avoidance of Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA) and Violence Against Children (VAC):** The works contract shall be planned and implemented in a way that addresses the risk of Gender Based Violence GBV (with zero tolerance), all forms of Sexual Exploitation and Abuse (SEA), Violence Against Children (a child is below eighteen years old), Alcohol and Substance abuse. The Bidder shall develop plans to mitigate such social risks at project execution sites. The Codes of Conduct and Action Plan for Preventing Gender Based Violence (GBV) and Violence Against Children (VAC) shall clearly define obligations on all project staff (including sub-contractors and day workers) with regard to implementing the project's environmental, social, health and safety (ESHS) and help prevent, report and address GBV and VAC within the work site and in its immediate surrounding communities.

## **C.2 Other requirements that build on employer responsibilities**

12. **Avoidance of Impacts on Private Property:** Except otherwise addressed by a Resettlement Plan implemented by the employer, the bidder's plan must not include deliberate or accidental damage to private property. Such unplanned damage shall demand repair of the property to the owner's satisfaction and at the contractor's own cost. For each repair, the Contractor shall obtain from the owner a certificate that the damage has been made good satisfactorily in order to indemnify the employer from subsequent claims. In cases where compensation for inconveniences, land acquisition, damage of crops etc. are claimed by owner, the Employer has to be informed by the Contractor through the SE. This compensation is in general settled under the responsibility of the Employer before signing

the Contract. In unforeseeable cases, the respective administrative entities of the Employer will take care of compensation.

**13. Protection of cultural heritage:** Upon discovery of ancient heritage, relics or anything that might or believed to be of cultural importance during the execution of works, the procedure for implementing the works contract is required to immediately report such findings through the process established by the employer aimed at protecting such cultural resources.

**D. Contractor's Environment and Social Management Plan (C-ESMP)**

Within 6 weeks of signing the Contract, the successful bidder shall prepare a C-ESMP to ensure the adequate management of the environmental, social, health and safety (ESHS) aspects of the works, including implementation of the requirements of these ESHS requirements and any specific requirements of an Environmental and Social Management Plan (ESMP) and Resettlement Action Plan (RAP) for the works. The Contractor's ESMP (C-ESMP) will serve two main purposes:

For the Contractor, for internal purposes, to ensure that all measures are in place for adequate EHS management,

As an operational manual for staff.

To ensure that the Contractor is fully prepared for the adequate management of the ESHS aspects of the project, and as a basis for monitoring of the Contractor's EHS performance.

The Contractor's ESMP shall provide at least:

a description of procedures and methods for complying with these general environmental management conditions, and any specific conditions specified in an EMP;

a description of specific mitigation measures that will be implemented in order to minimize adverse impacts;

a description of all planned monitoring activities (e.g. sediment discharges from borrow areas) and the reporting thereof; and

the internal organizational, management and reporting mechanisms put in place for such.

The Contractor's ESHS-MP will be reviewed and approved by the Client before start of the works. It is expected to be reviewed every six months and every review will be reviewed and approved by the Employer. This review would ascertain that the Contractor's ESMP covers all of the identified impacts and has defined appropriate measures to counteract any potential impacts.

**ESHS Payment Requirements**

It is expected that compliance with these conditions is already part of standard good workmanship and state of art as generally required under this Contract. The item "Compliance with Environmental Management Conditions" in the Bill of Quantities covers this cost. No other payments will be made to the Contractor for compliance with any request to avoid and/or mitigate an avoidable EHS impact.

OR

The bidder will cost the delivery of the ESHS requirements as a subsidiary obligation covered under the prices quoted for other Bill of Quantity items. However, provisional sums will be set aside for specific activities such as ESMP Trainings, HIV counselling services/SEA awareness and sensitization as mandatory ESHS outcomes.

Incorporation of Environmental and Social Requirements into Contract Management

The findings of the environmental and social assessment will need to be mainstreamed into the entire process for managing the BRT project. The requirements include the following;

Pre-Award Considerations

**Evaluation of the capacity of project bidders for implementation of ESHS requirements:** The project proponent will undertake a due diligence on the capacity of potential contractors for the faithful execution of the ESHS requirements of the project. This shall include

A review of the Environmental, Social, health & Safety (ESHS) policy of bidding firms;

Due diligence of the circumstances necessitating the suspension or termination of previous contracts on the basis of non-compliance with ESHS requirements of contracts

A review of the academic qualifications and experiences of key staff proposed to man key ESHS implementation functions by bidding firms

**Inclusion of a statement of ESHS requirements into bidding and contract documents:** The findings of the environmental and social assessment undertaken will be inserted into the bidding documents in a systematic manner. This will include;

A statement of the outcomes of properly implemented ESHS measures (sampled included in annex)

An inclusion of particular conditions of contract or specific contract provisions to furnish specific considerations such as regulatory limits, target periods to General Conditions of Contract (GCCs) provisions.

**Management Strategies and Plans for Identified ESHS Issues:** Based on the environmental and social assessment which have been reduced into a concise statement of ESHS requirements of the project, the project proponent will request bidders to propose Management Strategies and Plans to address ESHS issues as part of their bids. The strategies will demonstrate the capacity and knowledge of the bidder to manage the identified risks, if successful.

**Making provision in the Bill of Quantities (BoQ) of the project:** This provision can be made in form of measured work items (in case of engineering mitigation measures) OR lump sum provisions (where the contractor is expected to propose costs based on his methodology) OR provisional sums (in case of mitigation measures which have been studied and costed by the client).

**Inclusion of Supervisory Responsibility on ESHS issues into Terms of Reference of**

**Supervision Firm:** The proponent will include the qualifications, experience and responsibilities of E&S experts into the Terms of Reference of the Supervision Consultant's team.

Construction Phase

**Development Contractors ESMP:** The proponent shall request the successful bidder to develop a detailed costed Contractors ESMP based on the Management Strategies and Plans earlier detailed in the bids submitted. The C-ESMP will also contain all sub-plans stated in the environmental and social assessment carried out by the proponent such as the GBV Action Plan, Labour management procedures (LMP) manual, Traffic Management Plan, Occupational Health Management Plan etc with specific details reflecting approved implementation methodology will be prepared and submitted for approval by the contractor.

**Mobilization of ESHS Personnel:** The contractor shall ensure that all personnel that are to implement the measures described in client's E&S assessment and C-ESMP are available before construction works are initiated.

**Training of on-site personnel:** The personnel required for all construction and construction support services will be trained on the E&S requirements of the contract before works are launched.

**Routine Monitoring of E&S Performance of Contracts:** The monitoring plan described in this assessment will be implemented as scheduled. Data on identified monitoring indicators and other indicators that may be considered necessary will be collected by the various responsible persons.

**Update of Contractors ESMP:** In view of the dynamic nature of social risks of projects, the C-ESMP shall be reviewed and submitted for approval every six (6) months.

## **Annex 16: Integrated Pest Management Plan (IPMP)**

This is presented as a standalone document to accompany this ESMF.



## Annex 17

### Evaluation Checklist for Screening Business Plan

**a. Qualification Criteria for Submission of Individual Business Plans**

1. WAG membership of at least 6-9 Months
2. WAG Member must have 70% attendance of WAG meetings
3. Members of WAG must have an IGA

**b. Criteria for Evaluating Business Plan Under Round 1 Grant-Individual Grants**

- 1.1 Name of the Business Owner's Name: \_\_\_\_\_
- 1.2 Name of WAG affiliated to: \_\_\_\_\_  
 LGA: \_\_\_\_\_ Ward: \_\_\_\_\_
- 1.3. Contact address: \_\_\_\_\_
- 1.4. Date of appraisal \_\_\_\_\_

CRITERIA	SCORE (Tick against the score)		
<b><i>(On a scale of 0-2, where: "0" means unsatisfactory and "2" very satisfactory)</i></b>			
General aspect			
1. Is the proposed business activity in line with the NFWP objectives?	0	1	2
2. Has the individual clearly spelled out the objective and expected outputs of their business activity?	0	1	2
Management and operational aspect			
3. Has the individual provided details on who will manage the business activity?	0	1	2
4. Is the business owned by this WAG member who is submitting the business plan			
5. Has the individual provided a realistic implementation /action plan?	0	1	2
6. Has the individual provided procurement plan for the business activity?	0	1	2
7. Is the business plan simple enough to complete in one year?	0	1	2
Capacity aspect			
8. Does individual has required skills or prior experience to implement and manage the business activity?	0	1	2
9. Has the individual specified and planned for technical support she may need to implement the business activity	0	1	2
Market aspect			
10. Has the individual given due consideration to the market demand/availability for their business activity?	0	1	2
11. Has the individual provided details about their market linkage/marketing plan?	0	1	2
Financial aspect			

12. Are the inputs/costs provided in the budget realistic and sufficient?	0	1	2
13. Has the individual provided personal contribution to the business plan up-front?	0	1	2
14. Is the business plan cost within the funding ceilings set by NFWP (not exceeding USD 150)?	0	1	2
15. Has individual done cost-benefit/profitability analysis for their business activity?	0	1	2
Sustainability aspect			
16. Is the business plan sustainable after the provision of grant?	0	1	2
Risk aspect			
17. Has the business plan given due consideration to risks involved in implementing the business activity?	0	1	2
Environmental and social aspects			
18. Has the business plan considered the potential adverse social and environmental effects that may occur due to the business activity?	0	1	2
<b>TOTAL SCORE (0 to 34)</b>			

#### FINAL ASSESSMENT

Assessment	Decision Guide	Tick as appropriate
Recommended for funding	<ul style="list-style-type: none"> <li>■ If the individual business plan does not score "zero" in any of the criteria above</li> <li>■ If the overall score is 27 + (above 80%)</li> </ul>	
Deferred/Returned	<ul style="list-style-type: none"> <li>■ If the overall score is less than 27 (80%)</li> <li>■ If the business requires changes in some areas</li> </ul>	

If there are any improvements that are required to make the business plan successful, the assessment team may recommend to the individual/WAG those changes and outline them here below:

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#### APPRAISAL TEAM

NAME	DESIGNATION	SIGNATURE	DATE
1.			
2.			
3.			
4.			
5.			
6.			
7.			

#### b. BUSINESS PLAN APPROVAL PROCESS

##### 1. The Business Plan must meet the 10 criteria in (a) above.

2. Established that the business contained in the business plan is owned and managed by WAG member registered on PMIS
3. Confirm that the business is the type supported by NFWP (See follow up table)

<b>Possible livelihood activities to be supported</b>	<b>livelihoods activities not to be supported</b>
<ul style="list-style-type: none"> <li>▪ Agriculture (crop farming, livestock rearing, and Fisheries/Aquaculture).</li> <li>▪ Agro-processing activities</li> <li>▪ Petty trading</li> <li>▪ Service provision and artisans (hairdressers, tailors, food vendor, bakers, potters etc.).</li> <li>▪ IGAs that are legal and not harmful to the environment.</li> </ul>	<ul style="list-style-type: none"> <li>▪ IGAs related to deforestation (sales of charcoal, felling of trees, etc.).</li> <li>▪ IGAs linked with production of agrochemicals (pesticides and fertilizer).</li> <li>▪ IGAs connected to production/sales of harmful alcoholic drinks, tobacco or narcotic substances.</li> <li>▪ IGAs associated with prostitution and child trafficking.</li> <li>▪ Other IGAs harmful to the environment or illegal</li> </ul>

1. Establish the feasibility or otherwise of such business in the community contained in the business address segment
2. Established that amount require to start/expand/consolidate the business as contained in the business plan is within the grant ceiling ---state the limits for the Individuals.
3. Establish the ability and opportunities of the business to benefit other women in the community i.e. as employees, suppliers, buyers, service providers
4. Establish that the business is Climate friendly or there are measures to mitigate this.  
Business plan appraisal shall be conducted by the SPCU before funding. (*use business appraisal form annex xi*)

- i. Approval of business shall consider standards that include climate resilient measures and environmental assessments of the proposed enterprise.
- ii. Business plan appraisal and recommendation by LGA team (LFS and WAGSO) shall be conducted before submission to State for funding.
- iii. SPCU can seek for clarification or return business plan to beneficiary through LGA for amendment/correction/exclusion/inclusion of an item and resubmission.
- iv. Return of business plan to beneficiary can as well occur at LGA through WF/BBC for same reason mention (in iii) above.

**Grant disbursement process**

- i. WAG will jointly assess each member’s request for grant, evaluate their business plans with WFs.
- ii. Business appraisal and business plan recommendation shall be conducted by LPIU and SPCU
- iii. List of successful business to be funded shall be communicated to the WF through LPIU by SPCU
- iv. A Livelihood Grant Agreement shall be signed with each WAG member who made the list of successful candidate and Project ahead of the issuance of the grants which will stipulate terms and conditions.
- v. The SPCU shall disburse grants directly to WAG member based on appraised and approved business plans.