

**Federal Republic of Nigeria
Ministry of Budget and Economic Planning,
Ministry of Education, and Ministry of Health
and Social Welfare**

**Nigeria: Human Capital Opportunities for
Prosperity and Equality (HOPE)
Program (P181476) (Part 2 -Investment Project
Financing Component)**

Draft

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

August 8, 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Nigeria (the Recipient) will implement the Nigeria Human Capital Opportunities for Prosperity and Equality (HOPE) Program (the Operation), with the involvement of the Ministry of Education and its agencies (State Universal Basic Education Board (SUBEB) and Universal Basic Education Commission (UBEC)), the Ministry of Health and Social Welfare and its agencies (National Primary Healthcare Development Agency(NPHCDA) at the Federal and its State Primary Healthcare Development Agency (SPHCDA), Basic Healthcare Provision Fund (BHC PF), and the Ministry of Budget and Economic Planning and its state counterpart, as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide financing for the operation as set out in the referred agreement. The operation consists of a Program-for-Results Financing component described in Part 1 of Schedule 1 to the Financing Agreement (the “Program”) and an IPF Component described in Part 2 of Schedule 1 to the Financing Agreement (the “Project”).
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient through the Minister of Budget and Economic Planning. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanisms</p>	<p>Submit six-monthly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than 14 days after the end of each reporting period.</p>	<p>National Program Coordination Unit (NPCU) at the Federal Ministry of Budget and Economic Planning</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury]. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>Notify the Association of fatality or SEA/SH incidents within 24 hours of learning of the incident.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association as requested.</p>	<p>NPCU</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain qualified one Environmental and one Social staff and resources to support management of ESHS risks and impacts of the Project at the National and Participating states.</p>	<p>Establish and maintain an NPCU as set out in the Financing Agreement.</p> <p>Assign Environmental and Social officers responsible for E&S no later than one month after the Effectiveness Date and thereafter maintain the position throughout Project implementation.</p>	<p>NPCU and Participating states</p>
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>Prepare, consult upon, adopt, disclose, and implement the following instruments in accordance with the ESSs and in a manner acceptable to the Association:</p>	<p>1. Prepare, disclose, consult upon, and adopt the SEP by August 2024. Implement requirements of the SEP throughout Project implementation.</p>	<p>NPCU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ol style="list-style-type: none"> Stakeholder Engagement Plan (SEP) Labour Management Procedure 	<ol style="list-style-type: none"> Prepare, disclose, consult upon, and adopt the LMP no later than three months after the Effectiveness Date and prior to engaging Project workers and implement it throughout the Project lifecycle. 	
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	NPCU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOUR MANAGEMENT PROCEDURES</p> <p>Adopt and implement the Labour Management Procedure (LMP) including, inter alia, provisions on working conditions, management of workers' relationships, occupational health and safety (OHS) (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labour, child labour, grievance arrangements for Project workers, and applicable requirements for contracted workers such as consultants for Independent Verification Agencies (IVAs) or Monitoring and Evaluation (M&E), consistent with ESS2 and the Public Service Rules</p>	Adopt the LMP no later than three months after the Effectiveness Date, but before engaging Project workers, and thereafter implement the LMP throughout Project implementation.	NPCU and Participating states
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2 and the Recipient's ES Framework.</p>	Establish the grievance mechanism before engaging Project workers and thereafter maintain and operate throughout Project Implementation	NPCU and Participating states
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Adopt and implement OHS measures as an annex to the LMP to mitigate risks to the human population, traffic related risks and the environment.</p>	Same timeframe as action 2.1	NPCU and Participating states
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: This standard is not relevant for the Project.			
ESS 4: COMMUNITY HEALTH AND SAFETY: This standard is not relevant for the Project.			
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT: This standard is not relevant for the Project.			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES: This standard is not relevant for the Project.			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES: This standard is not relevant for the Project.			
ESS 8: CULTURAL HERITAGE: This standard is not relevant for the Project.			
ESS 9: FINANCIAL INTERMEDIARIES: This standard is not relevant for the Project.			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Prepare, disclose, consult upon, adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p>	Prepare, disclose, consult upon and adopt the SEP by August 2024 and thereafter implement the SEP throughout Project implementation.	NPCU
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	Establish the grievance mechanism no later than three months after Project Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation.	NPCU
CAPACITY SUPPORT			
CS1	<p>Capacity support to NPCU staff, stakeholders and, Project workers on:</p> <ul style="list-style-type: none"> • The E&S implementation and management in a PforR operation, results verification, consultation, communication, etc. • ESF Fundamentals (including ESHS Guidelines) • Labour Management Procedures • GRM Training • Stakeholder mapping and engagement • E-Waste Management • Importance of Resource Efficiency and Sustainable Procurement • OHS measures including on emergency prevention and preparedness. 	<p>Throughout Project implementation.</p> <p>Other specific training such as ESF/ESHS implementation will be conducted within 4 months of the Project Effective Date.</p>	NPCU and Participating states