

Federal Republic of Nigeria

Sustainable Procurement, Environmental and Social Standards Enhancement Project Original Financing and Additional Financing

(SPESSE-AF) (P169405)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP) (Appraisal)

May 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Nigeria (“the Recipient”) is implementing the Sustainable Procurement, Environmental and Social Standards Enhancement Project (the Project), with the involvement of the four implementing entities (i.e., National University Commission, Bureau of Public Procurement, Ministry of Environment and Federal Ministry of Women Affairs) and the Six Participating Centers of Excellence as set out in the Original and Additional Financing Agreement (the Agreements). The International Development Association (the Association) has agreed to provide the original financing and additional financing for the Project, as set out in Agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for the Project referred to above.
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 Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreements.
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, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreements, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient’s Representative specified in the Agreements or the Director, Federal Ministry of Finance. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on “Indicators for Implementation Readiness” below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the “Timeframe” column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	ORGANIZATIONAL STRUCTURE Maintain the National Facilitation Implementation Unit (NFIU) at the National Universities Commission (NUC) which oversees implementation by three Implementing Agencies (IAs): Bureau of Public Procurement (BPP); Federal Ministry of Environment (FMEnv); Federal Ministry of Women Affairs (FMWA); and the six Centers of Excellence (CEs) with qualified staff and resources to support management of E&S risks in sufficient numbers including at least one Environmental Specialist, one Social Specialist and a GBV specialist. Maintain the organizational structure as necessary throughout Project implementation period.	Maintain the NFIU throughout Project implementation.	NUC
B	CAPACITY BUILDING PLAN/MEASURES Prepare and implement the capacity building plan as follows <ul style="list-style-type: none"> Training for NUC Environmental, Social (E&S), and GBV specialists as well as E&S specialists of the IAs and CE on E&S screening of microprojects, E&S / OHS monitoring and reporting, Solid and E-wastes management, GBV reporting and response protocol, GM management and stakeholders mapping. 	Three (3) month after the Effective Date and throughout Project implementation.	NUC
MONITORING AND REPORTING			
C	REGULAR REPORTING Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include: <ul style="list-style-type: none"> Status of preparation and implementation of E&S documents required under the ESCP. Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. GBV cases received / complaints and referral process. Number and status of resolution of incidents and accidents reported under action E below. 	Commencing each three (3) months after the Effective Date. Submit each report to the Association no later than 10 days after the end of each reporting period.	NUC, IAs, CEs
D	CONTRACTORS' MONTHLY REPORTS Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.	Submit the Bi-annual report to the Association each six (6) months after the Effective Date upon request.	NUC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Association of any incident or accident relating 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 those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p>	NUC, IAs, CEs
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <p>Update the stakeholders list and update and redisclose the SEA/SH/GBV Action Plan and thereafter implement the stakeholders' engagement plan and SEA/SH/GBV Action Plan.</p>	Update the Stakeholders list and update and redisclose the SEA/SH/GBV Action plan three (3) months after the Effective Date and implement them throughout Project implementation.	NUC, IAs, CEs
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, <i>inter alia</i>, labor law provision, SEA/SH/GBV mitigation measures / Code of Conduct and national policy on OHS, into the E&S specifications of the procurement documents and contracts with IVA contractors and third-Party Monitoring agency. Thereafter ensure that the IVA contractors and Third-Party Monitoring firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.</p>	Share copies of relevant contracts provided with labor provision with the Association upon request.	NUC, IAs, CEs
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Carry out the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project, including, but not limited to capacity building activities to support the CEs in its project coordination role, consultancies for independent Verification Agency and technical assistance consultancies to support the continuation of professionalization efforts in procurement, as well as in social and environmental thematic areas in accordance with terms of reference</p>	Throughout Project implementation.	NUC, IAs, CEs

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	acceptable to the Association, that are consistent with the ESSs. Thereafter prepare and finalize the output of such activities in compliance with the terms of reference.		
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>USE OF RECIPIENT'S LABOR LAW</p> <p>Ensure that the labor management and working conditions of Project workers are consistent with this ESCP and the Recipient's labor law, which stipulates working conditions for Nigerian workers, protects workers' wages / minimum wage, covers terms and condition of employments, termination clauses, age of / eligibility for employment, promotes freedom of association including trade union etc.</p> <p>Promptly notify the Association of any changes to the Recipient's legal and policy framework concerning labor and working conditions as well as OHS as described below that may materially adversely affect the Recipient's ability to manage the labor risks and impacts of the Project in line with the ESS2 and the immediate measures taken or that are planned to be taken to address said changes and the ensuing potential risks and impacts of the Project. If, in the opinion of the Association, such changes adversely affect relevant ESHS risk management aspects of the Project, the Recipient shall agree to implement measures and actions to address them in a manner acceptable to the Association. The ESCP shall be updated to reflect such agreed actions.</p>	<p>Throughout Project implementation.</p> <p>Notify the Association immediately after taking notice of the change to the Recipient's relevant framework. Subsequent actions, if requested by the Association, shall be reflected in an updated ESCP as indicated in paragraph 4 of the Initial Section of this ESCP.</p>	NUC, IAs, CEs
2.2	<p>USE OF RECIPIENT'S NATIONAL POLICY ON OCCUPATIONAL SAFETY AND HEALTH</p> <p>Ensure that occupational health and safety (OHS) risks and impacts are assessed and managed in accordance with the Recipient's National Policy on Occupational Safety and Health, revised in 2020 and approved by the Federal Executive Council (FEC) which covers various sectors in Nigeria.</p>	Implement the policy prior to roll-out of electronic government procurement (E-GP) and the development of electronic repository and tracking system for the environmental and social assessments and thereafter implement the plan throughout Project implementation.	NUC, IAs, CEs
2.3	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, in line with the provisions of the Nigeria Labor Law.</p>	Establish grievance mechanism as required by Nigeria labor law prior to engaging Project workers (where applicable) and thereafter maintain and operate it throughout Project implementation.	NUC, IAs, CEs
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Ensure that the labor management and working conditions of Project workers are consistent with</p>	No later than three (3) months after the Effective Date and	NUC, IAs and CEs

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>this ESCP and the Recipient's labor law</p> <p>Ensure the solid and e-wastes management under project are consistent with the National Policy on Solid Waste Management and, and National Environmental (Electrical/Electronic Sector Regulations 2011.</p>	thereafter implement the WMP throughout Project implementation.	
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Prepare and implement a Pollution Management Plan (PMP).</p>	No later than three (3) months after the Effective Date and thereafter implement the PMP throughout Project implementation.	CEs
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Assess and manage traffic accidents risks and impacts to the community, students and faculty arising from commuting from one location to another to receive or to deliver lectures on PES standards. Update and implement the Journey Management Plan (JMP).</p>	No later than three (3) months after the Effective Date and thereafter implement the JMP throughout Project implementation.	NUC
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities such as, risks of labor influx, response to emergency situations, and include mitigation measures in an Occupational Health and Safety (OHS) Plan following the guidance in the national policy on OHS. In addition, it will be necessary for a safe work environment to be created and work culture to be instituted at all the IAs and CEs. To mitigate these risks, the Recipient will prepare and implement an Environmental and Social Health and Safety (ESHS) plan proportionate to the scale of these risks and impacts.</p>	Same timeframe as 2.2.	NUC, IAs and CEs
4.3	<p>SEA AND SH RISKS</p> <p>Update and implement SEA/SH Action Plan to manage SEA/SH risk</p>	Update the SEA/SH Action Plan no later than three (3) months after the Effective Date and thereafter implement the SEA/SH Action Plan throughout Project implementation.	NUC, IAs, CEs
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>Update stakeholders list and implement the Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to 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>	Update the SEP prior to Project appraisal and thereafter implement the SEP throughout Project implementation.	NUC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
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>	Implement the grievance mechanism no later than three (3) months after the Effective Date and thereafter maintain and operate the mechanism throughout Project implementation.	NUC, IAs, CEs
INDICATORS FOR IMPLEMENTATION READINESS			
<p>The following actions are indicators for implementation readiness:</p> <p>Actions:</p> <p>A</p> <p>1.1</p> <p>2.1</p> <p>4.3</p> <p>10.1</p> <p>10.2</p>			