

Federal Republic of Nigeria

**Federal Ministry of Communication, Innovation
and Digital Economy**

**Preparation of Proposed Building Resilient
Digital Infrastructure for Growth - BRIDGE
(P508383)**

Project Preparation Advance (PPA)

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

2 June 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Nigeria (the “Recipient”) is planning to implement the proposed Building Resilient Digital Infrastructure for Growth - BRIDGE (the Project), with the involvement of the Federal Ministry of Communications, Innovation and Digital Economy, for which it has requested a Project Preparation Advance (the PPA), as set out in the PPA Agreement. The International Development Association (hereinafter the Bank) has agreed to provide the PPA to finance activities (the Activities) related to the preparation of the Project, as set out in the referred agreement.
2. The Borrower shall ensure that Activities are 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 Bank. The ESCP is part of the PPA 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 the material measures and actions that the Recipient shall carry 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 under the Activities, all of which shall be subject to prior consultations, and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Bank.
4. As agreed by the Bank and the Borrower, this ESCP will be revised from time to time if necessary, during the implementation of the Activities, to reflect the adaptive management of changes and unforeseen circumstances related to the Activities or in response to assessment of performance of the Activities. In such circumstances, the Recipient through the Federal Ministry of Communications, Innovation and Digital Economy and the Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Recipient’s Representative specified in the Agreements, or the Director, Federal Ministry of Finance, or National Program Coordinator, BRIDGE implementation Unit. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING & REPORTING			
A	<p>REGULAR REPORTS</p> <p>Prepare and submit to the Bank monitoring reports on the environmental, social, health and safety (ESHS) performance of the Activities, including but not limited to the implementation of the ESCP, status of E&S instruments under preparation, stakeholder engagement activities, log and status of any complaints received.</p>	Submit monthly reports to the Bank during implementation of the Activities, commencing after the Effective Date. Submit each report to the Bank no later than 15 days after the end of each reporting.	Project Implementation Unit for this PPA
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Bank of any incident or accident related to the Activities which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public, or workers, including, but not limited to, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents resulting in death, serious or multiple injury. Provide sufficient details regarding the scope, severity and possible causes of the incident or accident, indicating the immediate actions that have been taken or are planned to be taken to address them, as well as any information provided by a contractor and/or supervisory company, as appropriate.</p>	<p>Notify the Bank no later than 48 hours after learning of the incident or accident.</p> <p>Subsequently, submit a report to the Bank within a time frame acceptable to the Bank.</p>	Project Implementation Unit for this PPA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Subsequently, at the request of the Bank, prepare a report on the incident or accident and propose measures to remedy it and prevent its recurrence.		
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE Recruit or appoint an Environmental Specialist and a Social Specialist, to assist in the recruitment of consultants, the preparation of the environmental and social instruments for project approval, to support the implementation of the stakeholder engagement plan and grievance redress mechanism and to support management of ESHS risks and impacts of the Activities.	Appoint an Environmental Specialist and a Social Specialist no later than 60 days after the Effective Date, and thereafter maintain these positions throughout the implementation of the Activities.	Project Implementation Unit for this PPA
1.2	TECHNICAL ASSISTANCE Ensure that consultancies, studies (including feasibility studies, if applicable),	Throughout the implementation of the Activities.	Project Implementation

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	capacity-building activities, training, and any other technical assistance activities under the Activities including, inter alia, environmental and social assessments and related environmental and social instruments, as well as the analysis of project alternatives and design decisions, are carried out in accordance with terms of reference acceptable to the Bank and that are consistent with the ESSs. Subsequently, ensure that the outputs of such activities comply with the terms of reference.		Unit for this PPA
ESS 2: LABOR AND WORKING CONDITIONS			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>2 LABOR MANAGEMENT PROCEDURES</p> <p>Ensure that workers are engaged in the implementation of the Activities consistent with ESS2.</p> <p>To this end, ensure that the following measures are carried out:</p> <ul style="list-style-type: none"> a) Provide workers with information and documentation that is clear and understandable regarding their terms and conditions of employment through written contracts setting out their rights, including, inter alia, rights related to hours of work, wages, overtime, compensation and benefits, as well as written notice of termination of employment, and details of severance payments, as applicable. b) Implement occupational health and safety (including personal protective equipment, and emergency preparedness and response) measures, taking into account the General Environmental, Health and Safety Guidelines (EHSGs), and other relevant Good International Industry Practice (GIIP) and, as appropriate, the industry-specific EHSGs and other Good International Industry Practice (GIIP); c) Implement measures, as applicable, to, inter alia: (i) prevent the use of all forms of forced labor and child labor; (ii) enable workers to benefit from, inter alia, access to grievance and redress mechanisms without 	<p>Carry out the measures throughout the implementation of the Activities</p>	<p>Project Implementation Unit for this PPA</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>fear of retaliation; and effective freedom to form and join workers organizations or alternative mechanisms for expressing their concerns and protect their rights related to labor and working conditions;</p> <p>d) Develop a code of conduct for workers, which shall include measures to prevent and respond to SEA and SH cases; and</p> <p>e) Incorporate the relevant requirements above in the ESHS specifications of the procurement documents and contracts with third parties that engage workers in the implementation of the Activities.</p>		
ESS 3 to ESS9			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3	Relevant aspects of these standards shall be considered in the technical assistance activities under action 1.2. above, as relevant.	Same timeframe as for action 1.2.	
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</p> <p>Integrate measures related to stakeholder engagement and information disclosure in the implementation of the Activities, in a manner consistent with ESS 10.</p> <p>To this end, prepare, consult, adopt, disclose and implement a Stakeholder Engagement Plan for the Activities.</p>	Adopt the SEP for Activities prior to the approval of the PPA and thereafter implement it throughout the implementation of the Activities.	Project Implementation Unit for this PPA
10.2	<p>GRIEVANCES</p> <p>Receive and facilitate the resolution of concerns and complaints regarding the Activities promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all parties affected by the Activities, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p>	Throughout the implementation of the Activities.	Project Implementation Unit for this PPA

