

Federal Republic of Nigeria
Health Security Program in Western and
Central Africa - Phase 4 under the Multiphase
Programmatic Approach
(P508003)

ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)

Appraisal Version
July 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Nigeria (the Recipient) will implement the Health Security Program in Western and Central Africa - Phase 4 under the Multiphase Programmatic Approach (P508003) (the Project), with the involvement of the Federal Ministry of Health and Social Welfare (FMOH&SW), the Federal Ministry of Agriculture and Food Security, the Federal Ministry of Environment, the Nigeria Centre for Disease Control and Prevention (NCDC), and the Participating States, as set out in the Financing Agreement (the Agreement). The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the Agreement.
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 Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the 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, 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 Agreement, 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 Agreement. 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 <ol style="list-style-type: none"> The NCDC shall establish the Environmental and Social unit consisting of one (1) Environmental Officer and one (1) Social Officer to support the management of environmental, social, health and safety risks and impacts of the Project. Each Participating State shall maintain in the State Ministry of Health (State Project Coordinating Units, SPCU) an Environmental Health Officer designated to serve as the environmental and social officer for each SPCU. 	<ol style="list-style-type: none"> Engage one (1) Environmental Specialist and one (1) Social Specialist at the National Project Coordination Unit (NPCU) during Project preparation and maintain these positions throughout Project implementation. Engage one (1) Environmental Health Officer to serve as the Environmental and Social Officer for each SPCU, within ninety (90) days after the Effective Date and maintain throughout Project implementation. 	FMOH&SW, NCDC/NPCU, and Participating States' SPCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement the following capacity building measures:</p> <ul style="list-style-type: none"> • Training for the NPCU E&S Officers and SPCU Environmental Health Officers on grievance mechanisms, Healthcare Waste Management (HCWM) to increase awareness of social, environmental and biohazard risks and strengthen the environmental and social implementation process. • Training for the NPCU and SPCUs on the Environmental and Social Framework (ESF), Stakeholder Engagement Plan, implementing the Environmental and Social Code of Practice, community health and safety. • Training for the FMOH&SW and SPCU on the Gender and GBV Action plan and Code of Conduct on GBV Prevention and Response. • The training of Grievance Redress Committee (GRC) members and stakeholders' engagement through the existing Ward Development committee. • Training of HCWM committee in the Participating States. 	<p>Prepare capacity building plan within six (6) months after the Effective Date and implemented throughout Project implementation.</p>	<p>FMOH&SW, NCDC/NPCU, and Participating States' SPCU</p>
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the E&S performance of the Project. The reports shall include:</p> <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. 	<p>Submit Quarterly Reports to the Association throughout Project implementation, commencing after the Effective Date</p> <p>Submit each report no later than ten (10) days after the end of each reporting period</p>	<p>FMOH&SW, NCDC/NPCU, and Participating States' SPCU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports Number and status of resolution of incidents and accidents reported under action E below. Other aspects that the reporting would need to be considered as relevant. 		
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>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.</p>	Submit the monthly reports to the Association upon request or as part of the Annex to the reports to be submitted under action C above	FMOH&SW, NCDC/NPCU, and Participating States' SPCU
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</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Notify the Association of SEA/SH incidents within 24 hours of learning of the incident.</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>	FMOH&SW, NCDC/NPCU, and Participating States' SPCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	actions to be taken to address the incident or accident and prevent its recurrence.		
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <p>1. Prepare, consult upon, adopt, disclose, and implement the following instruments in accordance with the ESSs and in a manner acceptable to the Association:</p> <ul style="list-style-type: none"> i. Environmental and Social Management Framework (ESMF) ii. Stakeholder Engagement Plan (SEP) iii. Labor Management Plan (LMP) iv. Environmental and Social Management Plan (ESMP) <p>2. Update and implement the existing Health Care Waste Management Plan prepared under CoPREP (P173980) for the Project, to be consistent with the relevant ESSs.</p> <p>3. Update and implement the existing Grievance Redress Mechanism (GRM) Manual prepared under the Nigeria COVID-19 Preparedness and Response Project (CoPREP) P173980</p>	<p>1. i. Prepare, disclose, consult upon, and adopt the ESMF by July 2025, and thereafter implement the ESMF throughout Project implementation.</p> <p>ii. Prepare, disclose, consult upon, and adopt the SEP by July 2025. Implement requirements of the SEP throughout Project implementation.</p> <p>iii. Prepare, disclose, consult upon, and adopt the LMP by July 2025. Implement requirements of the LMP throughout Project implementation.</p> <p>iv. Prepare and disclose ESMP within ninety (90) days after the Effective Date.</p> <p>2. Update the HCWMP within ninety (90) days after the Effective Date and thereafter implement HCWMP throughout Project implementation.</p> <p>3. Update the GRM within ninety (90) days after the Effective Date and thereafter implement throughout Project implementation.</p>	FMOH&SW, NCDC/NPCU, and Participating States' SPCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, <i>inter alia</i>, ESMF and ESMP, the LMP, and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising 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>	As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Association upon request.	FMOH&SW, NCDC/NPCU, and Participating States' SPCU
	<p>Technical Assistance</p> <p>Ensure that the consultancy 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 are in compliance with the terms of reference</p>	Throughout Project implementation.	The Federal Ministry of Finance and NCDC/NPCU
1.3	<p>CONTINGENT EMERGENCY RESPONSE FINANCING</p> <p>a) Ensure that the CERC Manual as specified the legal agreement includes a description of the ESHS assessment and management arrangements including the ESMF Addendum that will be included or referred to in the CERC Manual for the implementation of the CERC component, in accordance with the ESSs.</p> <p>b) Implement the E&S provisions of the CERC Manual and CERC-ESMF Addendum, and any assessment and plans required therein.</p>	<p>a) The preparation of the CERC manual and CERC-ESMF Addendum, in form and substance acceptable to the Association is a withdrawal condition under Section III.B of Schedule 2 of the Financing Agreement</p> <p>b) In accordance with the timeframe specified in the CERC Manual and CERC-ESMF.</p>	The Federal Ministry of Finance and NCDC/NPCU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt, and implement the LMP including, <i>inter alia</i>, 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 labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors consistent with ESS2.</p>	Adopt the LMP no later than three (3) months after the Effective Date, but before engaging Project workers, and thereafter implement the LMP throughout Project implementation.	FMOH&SW, NCDC/NPCU, and Participating States' SPCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN Adopt and implement OHS as an annex to the LMP to mitigate risks to the human population and the environment because of transportation of goods and project personnel, biohazards risks, health care wastes,	Prior to Project Implementation and maintained throughout Project implementation.	FMOH&SW, NCDC/NPCU, and Participating States' SPCU
2.3	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain and operate a grievance mechanism for Project workers as described in the LMP and consistent with ESS2.	Prior to engaging Project workers and maintained throughout Project implementation	FMOH&SW, NCDC/NPCU, and Participating States' SPCU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Update, adopt, and implement a Health Care Waste Management Plan, acceptable to the Association, to manage the waste that may be generated from the service delivery following the protocol of reducing, reusing and recycling, waste from procured electronic and solar equipment	Update the HCWMP within ninety (90) days after the Effective Date and implement throughout Project implementation	FMOH&SW, NCDC/NPCU, and Participating States' SPCU
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMF.	Prior to Project Implementation. To be implemented throughout Project implementation.	FMOH&SW, NCDC/NPCU, and Participating States' SPCU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Adopt and implement measures and actions to assess and manage road safety risks as required in the ESMF to be developed under action 1.1 above.	Prior to commencement of Project Implementation and maintained throughout Project implementation.	FMOH&SW, NCDC/NPCU, and Participating States' SPCU
4.2	COMMUNITY HEALTH AND SAFETY Manage specific risks and impacts to the community arising from Project activities and response to emergency situations, which include mitigation measures in the ESMF.	Prior to Project Implementation. To be implemented throughout Project implementation.	FMOH&SW, NCDC/NPCU, and Participating States' SPCU
4.3	GBV, SEA AND SH RISKS Prepare, adopt, and implement a Code of Conduct for Sexual Exploitation and Abuse (SEA) / Sexual Harassment to mitigate the potential risk associated with SEA/SH.	Prior to commencement of any facility and community level activities and throughout the project implementation	FMOH&SW, NCDC/NPCU, and Participating States' SPCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.4	<p>SECURITY MANAGEMENT</p> <p>Adopt the Security Management Plan prepared under CoPREP. The Recipient will adopt, and implement, the Security Management Plan, in a manner acceptable to the Association. In implementing security risk prevention and mitigation measures, the Recipient will be guided by the principles of proportionality and Good International Industry Practice (GIIP), and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of security personnel.</p>	Prior to commencement of Project activities and throughout the project implementation	FMOH&SW, NCDC/NPCU, and Participating States' SPCU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT PLANS</p> <p>Screen the designated construction areas using the screening tool for ESS 5 provided in the ESMF to identify potential impact. Where relevant, prepare and implement Resettlement Action Plans (RAPs) for the Land Acquisition for the Warehouse and regional laboratories under the Project consistent with ESS5.</p>	<p>Screen construction areas once identified.</p> <p>Prepare and implement RAPs prior to carrying out the relevant works, including ensuring that before taking possession of the land and related assets, full compensation has been provided, and [as applicable] displaced people have been resettled and moving allowances have been provided.</p>	FMOH&SW, NCDC/NPCU, and Participating States' SPCU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
Not relevant to the project			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
Not relevant to this project			
ESS 8: CULTURAL HERITAGE			
Not relevant to the project			
ESS 9: FINANCIAL INTERMEDIARIES			
Not relevant to the project			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Prepare, adopt, disclose, and implement the Stakeholders Engagement Plan (SEP), including GRM.</p> <p>SEP to be incorporated into the Project's management system, adequate staffing and budget will be allocated for the implementation of the SEP.</p>	Prior to Project appraisal.	FMOH&SW, NCDC/NPCU, and Participating States' SPCU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>10.2 PROJECT GRIEVANCE MECHANISM</p> <p>Update, publicize, maintain, and operate existing an accessible grievance mechanism for the CoPREP, 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>	<p>Before Project commencement and throughout Project implementation.</p>	<p>FMOH&SW, NCDC/NPCU, and Participating States' SPCU</p>
<p>10.3</p>	<p>The following actions are indicators for implementation readiness:</p> <ol style="list-style-type: none"> 1. Updated HCWMP and GRM Manual from CoPREP – within ninety (90) days after the Effective Date 2. Draft ESMF, LMP and SEP by Appraisal, final ESMF, LMP, SEP & ESCP before decision meeting 	