

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Federal Republic of Nigeria

**Preparation Grant for Nigeria Infrastructural Finance
and Guarantee Platform –
(P182128)**

September 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Nigeria (the Recipient) is planning to implement certain activities (the Activities) for the preparation of a proposed Nigeria Infrastructure Finance and Guarantee Platform Project (the "Project"), with the involvement of the Nigeria Sovereign Investment Authority (NSIA), for which it has requested a preparation grant, as set out in the Letter of Agreement ("Agreement"). The International Development Association (hereinafter the Association) has agreed to provide a grant to finance the Activities, as set out in the referred Agreement.
2. The Recipient shall ensure that the 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 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 for the Activities, 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, during the implementation of the Activities, to reflect 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 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.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A.	ORGANIZATIONAL STRUCTURE		
	a) Establish and maintain, an environment and social unit within a Project Management Unit (PMU) with qualified staff (Project manager, Technical Advisors, Finance / Admin Officer, including at least one environmental and one social specialist) and resources to support the management of environmental, social, health and safety (E&S) risks and impacts of the Grant Activities under the Nigeria Sovereign Investment Authority (NSIA). b) Ensure adequate resources are allocated for ESCP implementation throughout grant life.	a) Establish an E&S unit in the NSIA PMU and appoint E&S staff within two (2) months of the Effective Date and thereafter maintain the staff throughout Activities implementation. b) Throughout Activities implementation.	NSIA/PMU
B.	CAPACITY BUILDING PLAN/MEASURES - Conduct training for PMU E&S staff on ESF principles, requirements and relevant instruments. - Strengthen institutional capacity for E&S risk management.	Prepare capacity building plan within four (4) months after the Effective Date and implement it throughout Activities Implementation.	NSIA/PMU

MONITORING AND REPORTING		TIMEFRAME	RESPONSIBLE ENTITY
MATERIAL MEASURES AND ACTIONS			
C.	REGULAR REPORTING		
	Prepare and submit to the Association monitoring reports on the E&S 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. These reports shall include: a) Status of preparation and implementation of E&S documents required under the ESCP. b) Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan (SEP).	Submit quarterly reports (covering items a)-d) etc.) to the Association no later than ten (10) days after the end of each reporting period.	NSIA/PMU

	c) Complaints submitted to the grievance mechanism(s), the number of grievances received, Number resolved, and progress made in resolving pending grievances. d) Number and status of resolution of incidents and accidents reported under action D below. including other aspects that the reporting would need to be considered as relevant.		
D.	INCIDENTS AND ACCIDENTS Notify the Association of any incident or accident relating 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 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. 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.	Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request. Provide review report and Corrective Action Plan to the Association no later than ten (10) days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.	NSIA/PMU NSIA/PMU

ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
	TECHNICAL ASSISTANCE		NSIA/PMU
1.2	Ensure that the consultancies, studies, activities (including the development of model contracts and standardized tools/templates/guidelines, transaction screening and prioritization, feasibility validation and market readiness and stakeholders engagements), capacity building, and training under the Activities includes measures to manage E&S risk associated with these activities and [including, inter alia] [Grievance Management System] are carried out in accordance with the terms of reference as agreed with the Association and consistent with the ESSs. Thereafter ensure that the output of such activities comply with the terms of reference.	Throughout implementation of the Activities	
ESS 2: LABOR AND WORKING CONDITIONS			
	LABOR MANAGEMENT PROCEDURES		NSIA/PMU
	Ensure that workers are engaged in the implementation of the Activities consistent with ESS2 and National Labour Law. To this end, ensure that the following measures are carried out: 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 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. d) Develop a code of conduct for workers, which shall include measures to prevent and respond to SEA and SH cases. e) Incorporate the relevant requirements above in the E&S specifications of the procurement documents and contracts with third parties that engage workers in the implementation of the Activities.	To be implemented throughout Activities implementation. <	

ESS 3 to ESS9			
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.	NSIA/PMU
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE Incorporate stakeholder engagement and information disclosure measures in the implementation of the Activities, in a manner consistent with ESS10. To this end, ensure that the following measures are implemented: a) Provide stakeholders with information about the environmental and social risks and impacts of the Activities in a timely, understandable, accessible and appropriate manner and format, including but not limited to any environmental and social instruments prepared as part of the Activities e.g. in project offices and website as applicable etc. b) Consult stakeholders in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation, including with regards to any environmental and social instruments prepared as part of the Activities. c) Document the stakeholder engagement activities, including: (i) stakeholder mapping; (ii) description of consultations and participation mechanisms utilized, and records of meetings held; (iii) feedback received and responses to said feedback; and (iv) measures to engage stakeholders who, because of their particular circumstances, may be disadvantaged or vulnerable;	Implement the stakeholder engagement activities throughout implementation of the Activities	NSIA/PMU
10.2	GRIEVANCE MANAGEMENT Establish and operationalize a Grievance Management (GM) system to receive and facilitate resolution of concerns and grievances in relation to 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.	Within three (3) months of the Effective Date and implement throughout	NSIA/PMU