

Federal Republic of Nigeria
**NIGERIA SUSTAINABLE AGRICULTURAL VALUE-
CHAINS FOR GROWTH PROJECT**
(P510848)

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

Appraisal Version

February, 2026

¹ The version that will be part of the negotiations package can be titled “For negotiations”. Once the ESCP is agreed at negotiations, the reference should be changed to “Negotiated” and dated the day of the conclusion of negotiations. If the ESCP is updated during implementation, the reference should be changed to “Updated” and the date should be revised the day of finalization of the update. ESCPs should always be dated and properly labelled.

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Nigeria (the Recipient) will implement the Nigeria Sustainable Agricultural Value-Chains for Growth - P510848 (AGROW) (the Project), with the involvement of the Federal Ministry of Agriculture and Food Security (FMAFS) and Selected States, as set out in the Financing Agreement (the Agreement). The International Development Association (the Association), has agreed to provide the 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[s]. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement[s].
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[s], 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[s] or Minister of the 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 SUPPORT²			
A	ORGANIZATIONAL STRUCTURE Establish and maintain throughout Project implementation a Project Implementation Unit (PIU) with qualified staff to support management of E&S risks in sufficient numbers, including at least one (1) Environmental Specialist, one (1) Social Specialist, and one (1) GBV Specialist in the PIU.	The Environmental, Social, and GBV specialists will be fully deployed/ engaged not later than 3 months after effectiveness and maintained throughout project implementation as necessary.	FPCU at the Federal Ministry of Agriculture and Food Security (FMAFS); and the Participating States
B	CAPACITY BUILDING PLAN/MEASURES Prepare and implement the following capacity building measures for PIU staff, Fund Manager E&S staff, stakeholders, project workers on the following; <ul style="list-style-type: none"> a) Implementation of Environmental and Social Management Framework (ESMF), Labor Management Procedure (LMP), Resettlement Action Plan and Resettlement Policy Framework (RPF) Integrated Pest Management Plan (IPMP) and Stakeholder Engagement Plan b) E&S requirements of subprojects c) World Bank ESF d) Occupational health and safety including Community health and safety) Communities (construction stage impacts, safety provisions, OHS guidelines) e) Environmental and Social Risk Management procedures f) Effective GM operation g) SEA/SH and Accountability and Response approach including Code of Conduct (CoC). 	Training will be started before commencement of the Project activities and will be implemented throughout the Project implementation.	FPCU/SPIUs/Fund manager
MONITORING AND REPORTING			
C	REGULAR REPORTING [Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS), performance of the project. These 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 	Submit Quarterly reports to the Association throughout Project implementation commencing after the Effective Date. Submit each report to the Association no later than ten (10) days after the end of each reporting period.	FPCU/SPIUs/Fund managers

² For all actions, consult with the country lawyer to ensure consistency with the legal agreement in cases where some actions need to be completed before the project becomes effective (effectiveness condition) or before certain disbursements can occur (disbursement condition).

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	<p>in resolving them.</p> <ul style="list-style-type: none"> 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. Status of Implementation of actions in the ESMS 		
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> <p>Given ADMLF has FI type role (performance based matching grants channeled to private off takers/agribusinesses), the Fund Manager will submit Quarterly monitoring reports on implementation of Environmental & Social Management System (ESMS) to the association-</p>	<p>Submit the monthly reports to the Association upon request.</p> <p>Quarterly reports shall be submitted to the PIU and to the Association upon request</p>	<p>FPCU/ SPIU</p> <p>SPIU/Fund Manager</p>
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; 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 ten (10) days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p>	<p>FPCU/SPIU/Fund manager</p> <p>State PIUs will copy Federal PCU in their communication to the Association)</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <p>Prepare and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. The ESMF shall include a section on E-waste management,</p>	<p>Prepare and disclose the ESMF prior to appraisal completion and thereafter implement throughout</p>	<p>FPCU/SPIU/Fund manager</p>

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	<p>guidance regarding how to manage any negative impacts of tangible or intangible cultural heritage at project sites, and a social analysis that will identify key social inclusion and risk issues, and the impact on different stakeholders.</p> <p>Ma</p>	Project implementation. Prepare site specific ESMPs once sub project locations are known. Ensure relevant mitigation measures including ESMP are included in respective bidding documents for the respective subproject. Once finalized, implement the respective ESMP throughout Project implementation.	
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&S documents, the Code of Conduct / SEA /SH action plans and the Labor Management Procedures / OHS requirements and adequate remedies into the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the Contractors, supervising engineers and consultants comply with the ESHS specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association</p>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors and consultants throughout Project implementation</p>	FPCU/SPIU/Fund manager
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project [, including, inter alia,] preparation of site specific instruments such as ESMPs, RAPs Child Labor prevention plan e.t.c in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	Throughout Project implementation.	PCU/PIUs
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Prepare and implement the labor management procedures (LMP) for the project. The LMP outlines the issues related to child labor, labor influx, working conditions and how to manage labor force on the Project.</p> <p>The provisions of the LMP will be adopted by contractors, the Federal and State PIUs and other relevant implementing agencies.</p>	Prepare the LMP prior to appraisal, and thereafter implement the LMP throughout Project implementation.	FPCU/SPIU/Fund manager
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</p> <p>Prepare and implement an OHS Management Plan to assess and manage the OHS risks and impacts</p>	OHS plan will be prepared and adopted prior to the commencement of construction	FPCU/SPIUs/ Contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>of the Project.</p> <p>[AND/OR]</p> <p>Require contractors and subcontractors to prepare and implement site specific OHS Management Measures or Plans in accordance with the LMP/ESMS/ESMF guidelines</p>	activities and shall be implemented throughout the project duration by the contractor.	
2.3	<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.</p>	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation	FPCU/SPIUs
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Prepare and implement a Waste Management Plan (WMP), as part of the ESMP prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3. PEST MANAGEMENT</p>	Prepare the WMP prior to commencement of implementation and thereafter implement the WMP throughout Project implementation.	FPCU/SPIUs/Fund manager
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Prepare, adopt, and implement subproject specific Pest Management Plans (PMPs), as per general guidance provided by the Project IPMP.</p> <p>Ensure that the pest management follows integrated approaches identified in the IPMP and the pesticides used are manufactured, packaged, labelled, handled, stored and disposed of, in accordance with national regulations, good international industry practices (GIIP), and World Bank Group's ESHGs.</p>	Project IPMP has been prepared; site specific PMPs will be prepared before commencement of any pesticide related work and during preparation of ESMPs; implemented throughout the Project implementation	FPCU/SPIUs
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.1 above.</p>	[e.g., Same timeframe as for the preparation and implementation of the ESMP.]	FPCU/SPIUs
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities [, including, inter alia,] [e.g., behavior of Project workers, risks of labor influx, response to emergency</p>	Same timeframe as for the preparation and implementation of the ESMPs.	FPCU/SPIUs

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	situations], and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.		
4.3	<p>SEA AND SH RISKS</p> <p>Prepare, adopt and Implement a GBV action plan and a Code of Conduct for Sexual Exploitation and Abuse (SEA) / Sexual Harassment (SH) to mitigate the potential risk associated with SEA/SH.</p>	<p>Within three months after the Effective Date and to be implemented throughout Project implementation.</p> <p>Include approved GBV Action Plan in procurement documents / contract documents. To be implemented throughout project implementation.</p>	FPCU/SPIUs
4.4	<p>SECURITY MANAGEMENT</p> <p>Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and implement a Security Management Plan (SMP), in a manner acceptable to the Association. In implementing the 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> <p>Include the SMP in the bidding documents of the contractors, and ensure the contractors comply with the requirements of SMP.</p>	<p>Within six months after effective date and thereafter implemented throughout Project implementation.</p>	FPCU/SPIUs
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			

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5.1	<p>RESETTLEMENT [FRAMEWORK] [PLAN] or [PLANS]</p> <p>1. Prepare and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.</p> <p>2. Prepare and implement a Resettlement Plan (RP) or a Livelihood Restoration Plan (LRP) [for each activity under the Project for such RP or LRP is required], [as set out in the RPF] [and] consistent with ESS5.</p>	<p>1. Prepare and disclose the RPF before appraisal completion and thereafter implement the RPF throughout Project implementation</p> <p>2. Prepare and implement the respective RP or LRP 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>	FPCU/SPIUs
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>The project will avoid critical natural habitats, screening of project activities to prevent habitat degradation (e.g. due to expanded cultivation). will be done using the screening checklist on the ESMF and ESMP</p>	Prior to commencement of any activity	FPCU/SPIUs
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES (NOT APPLICABLE)			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p> <p>Prepare and implement a Cultural Heritage Management Plan (CHMP) [as part of the ESMP, in accordance with the guidelines of the ESMF prepared for the Project, and consistent with ESS8.</p>	Before commencement of any civil works and thereafter implement the CHMP throughout Project implementation.	FPCU/SPIUs
8.2	<p>CHANCE FINDS</p> <p>Describe and implement the chance find procedures, as described in the ESMF of the Project and any other measures needed in accordance with ESS8; and as will be detailed in site specific ESMPs</p>	Same timeframe as for the adoption and implementation of the ESMF. Implement the procedures throughout Project implementation	FPCU/SPIUs
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
9.1	<p>ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)</p> <p>Update/develop an ESMS that is consistent with the requirements of ESS9 prior to accessing the funding. The Fund manager will require the private sector off takers to also follow its ESMS requirements</p>	60 days after effectiveness and prior to accessing the fund and commencement of activities of the identified off takers	Fund manager
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>Update 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>	Update and disclose the SEP prior to appraisal and thereafter implement throughout Project implementation.	FPCU/SPIUs
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 3 months after effectiveness and thereafter maintain and operate the mechanism throughout Project implementation.	FPCU/SPIUs
<p>INDICATORS FOR IMPLEMENTATION READINESS</p> <p>The following actions are indicators for implementation readiness:</p> <ol style="list-style-type: none"> 1. Project-level GBV Action Plan and code of conduct will be prepared within ninety (90) days of Effective Date 2. Draft SEP by Appraisal, Final SEP & ESCP before decision meeting 3. Establishment of E&S risk management units in the SPIUs and FPCU not later than three (3) months after the Effective Date 4. The ADMLF to establish an ESMS acceptable to the Bank sixty (60) days after Effective Date and prior to accessing the funding 			