

NIGERIA SUSTAINABLE AGRICULTURE VALUE CHAINS FOR GROWTH (AGROW) PROJECT



ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

FINAL REPORT

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List of Acronyms

ADMLF	Agribusiness De-Risking and Market Linkage Facility
AEPR	Annual Environmental and Social Performance Report
AGROW	Nigeria Sustainable Agriculture Value Chains for Growth Project.
API	Application Programming Interface
ARAP	Abbreviated Resettlement Action Plan
BMP	Biodiversity Management Plan
BoQ	Bill of Quantities
CAP	Corrective Action Plan
CAPA	Corrective and Preventive Action
C-ESMP	Contractor Environmental and Social Management Plan
CBO	Community-Based Organization (local engagement and GM structure).
CITES	Convention on International Trade in Endangered Species
CoC	Code of Conduct
CofO	Certificate of Occupancy
CRC/CRL	Child Rights Act / Child Rights Law
CSO	Chief Security Officer
DCP	Dry Chemical Powder (standard fire extinguisher for OHS compliance).
DPIA	Data Protection Impact Assessment
EA	Environmental Assessment
ECOWAS	Economic Community of West African States
EGS	Early Generation Seed
EHS	Environment, Health and Safety Guidelines (World Bank Group).
EHS/HSE	Environment, Health and Safety / Health, Safety and Environment
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESS	Bank Environmental and Social Standards
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESRS	Environmental and Social Review Summary
FAO	Food and Agriculture Organization
FISS	Fertilizer Inspection and Sampling System
FMAFS	Federal Ministry of Agriculture and Food Security
FMEnv	Federal Ministry of Environment

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FMWR	Federal Ministry of Water Resources
FPCU	Federal Project Coordination/Management Unit
FI	Financial Intermediary
GBV	Gender Based Violence
GIL	Gender Innovation Lab
GM	Grievance Mechanism
GRC	Grievance Redress Committee -Based Violence
H&S	Health and Safety
HSE	Health, Safety and Environment
IDA	International Development Association
IDP	Internally Displaced Person
IPF	Investment Project Financing
IPMP/IPM	Integrated Pest Management Plan / Integrated Pest Management
IVA	Independent Verification Agency
IVR/USSD	Interactive Voice Response / USSD
KBA	Key Biodiversity Area
KPI	Key Performance Indicator
LGA	Local Government Area
LMP	Labor Management Procedures
LTIFR/TRIR	Lost Time Injury Frequency Rate / Total Recordable Incident Rate
M&E	Monitoring and Evaluation
MDAs	Ministries, Departments and Agencies
NASC	National Agricultural Seeds Council
NBS	National Bureau of Statistics
NAFDAC	National Agency for Food and Drug Administration and Control
NCMM	National Commission for Museums and Monuments
NESREA	National Environmental Standards and Regulations Enforcement Agency
NiMet	Nigerian Meteorological Agency
OHS	Occupational Health and Safety
PAD	Project Appraisal Document (WB project design document).
PAP	Project-Affected Person
PCAR	Post-Construction Audit Report
PCN	Project Concept Note
PBC	Performance-Based Conditions
PMP	Pest Management Plan
PoP	Package of Practices
PWD	Person with Disabilities
RAP	Resettlement Action Plan
RCA	Root Cause Analysis
RPF	Resettlement Policy Framework
SARC	Sexual Assault Referral Centre
SEA/SH	Sexual Exploitation, Abuse and Sexual Harassment
SEP	Stakeholder Engagement Plan
SEEDCODEX	Seed Authentication/Traceability System
SEPA	State Environmental Protection Agency
SIS	Safeguards Information System
SPIU	State Project Implementation Unit
SRI/UDP	System of Rice Intensification / Urea Deep Placement
TBT	Toolbox Talk
TOR	Terms of Reference
TPM	Third-Party Monitor

UDP	Urea Deep Placement
VAC	Violence Against Children
VAWG	Violence Against Women and Girls
VAPP Act	Violence Against Persons (Prohibition) Act
WB	World Bank
WHO Ia/Ib	World Health Organization Pesticide Hazard Category Ia/Ib

Executive Summary

ES 1. Project Context and Strategic Orientation

The Nigeria Sustainable Agriculture Value Chains for Growth (AGROW) Project is a \$500 million, six-year Investment Project Financing (IPF) operation supported by the World Bank and implemented by the Federal Government of Nigeria through the Federal Ministry of Agriculture and Food Security (FMAFS) designed to transform Nigeria’s agricultural system. It emphasizes agricultural modernization, -year Investment Project Financing (IPF) operation supported by the World Bank and implemented by the Federal Government of Nigeria through the Federal Ministry of Agriculture and Food Security (FMAFS) designed to transform Nigeria’s agricultural system. It emphasizes agricultural modernization, private-private sector-sector-sector de-risking, digital agriculture expansion, and regulatory reform to support competitiveness, resilience, and food security. Given the demand-driven nature of investments and the fact that specific subproject locations and designs will be finalized during implementation, the ESMF provides the mandatory safeguards architecture governing all AGROW subprojects before design, financing, procurement, or construction begins. The Project Development Objective (PDO) is to increase smallholder productivity and private sector investment in agriculture, thereby improving food and nutrition security and job creation in participating states in Nigeria.

ES 2. ESMF Purpose and Scope

Because the exact locations, designs, and technologies of subprojects will be determined during implementation, the ESMF provides the overarching framework for:

- **Environmental & social (E&S) screening and classification**
- Preparation of **impact assessments (ESIAs), ESMPs, RAPs, IPMP-risk plans**
- Compliance with **World Bank ESS1–10** and Nigerian regulations
- Defining **institutional mandates**, accountability, and reporting
- Establishing **risk mitigation hierarchy**, performance monitoring, and budget requirements

The ESMF is thus the “**governance guardrail**” that ensures development benefits while preventing or minimizing harm.

ES 3. Applicable World Bank Environmental and Social Standards

The AGROW Project is classified as **Substantial Environmental and Social Risk** and triggers the following World Bank Environmental and Social Standards:

- **ESS1** – Assessment and Management of E&S Risks and Impacts
- **ESS2** – Labor and Working Conditions
- **ESS3** – Resource Efficiency and Pollution Prevention

- **ESS4** – Community Health and Safety (including security risks)
- **ESS5** – Land Acquisition and Involuntary Resettlement
- **ESS6** – Biodiversity Conservation and Living Natural Resources
- **ESS8** – Cultural Heritage
- **ESS9** – Financial Intermediary
- **ESS10** – Stakeholder Engagement and Information Disclosure

ESS9 is applied indirectly to private-sector activities under ADMLF through a fit-for-purpose Environmental and Social Management System (ESMS) as presented in **Annex 38**.

ES 4. Project Components and Their E&S Footprint

Component 1: De-risking Private Sector Investments in Aggregation and Offtake of Smallholder Commodities (ADMLF Facility)

- Competitive, performance based matching grants for aggregation, processing, storage, and logistics-based matching grants for aggregation, processing, storage, and logistics.
- Managed by a professional Fund Manager under ESS9 – Financial Intermediaries.

Highest E&S risk footprint due to construction, operations, labor influx, sourcing models, and community interfaces.

Component 2: Public Investments for Modernization of Smallholder Production

- 2.1 – Strengthening Research, Extension, Technology Transfer Systems
- 2.2 – Digital Agriculture Ecosystem (farmer registry, soil maps, weather services, interoperability)

Moderate E&S risks: OHS in demonstrations, agrochemical misuse, data privacy, digital exclusion.

Component 3: Policy and Enabling Environment for Private Investment in Inputs Markets and Land Tenure Security

- Seed and fertilizer regulatory reforms
- Upgrade to NASC’s labs, center of excellence for seed technology, seed bank upgrades, fertilizer testing labs
- Land tenure reforms (CofO issuance)

Moderate E&S risks: Land acquisition and Involuntary resettlement, construction, operations, labor influx, sourcing models, and community interfaces, institutional, governance, and conflict related-related.

Component 4: Coordination, Monitoring & Evaluation

- Federal Project Coordination Unit (FPCU) and SPIUs
- Manages ESF compliance, GM, GBV/SEA-SH mitigation, M&E, audits
- Risks relate to oversight failures, weak GM, and GBV case mis-management.

ES 5. Environmental and Social Baseline Context

AGROW operates across diverse agro-ecological zones with varying levels of environmental sensitivity, land tenure complexity, and social vulnerability. Nigeria’s environmental and socioeconomic context introduces systemic vulnerabilities relevant to AGROW: Baseline conditions highlight risks related to:

Environmental Baseline

- Diverse agro-ecological zones from Sahel to mangroves
- Rainfall variability (500–2,000 mm) and increasing climate volatility
- Soil fertility constraints and erosion sensitivity
- High-value biodiversity (4,700+ plant species; threatened fauna)
- Major river systems (Niger/Benue) with flood risk
- Pesticide and fertilizer use
- Biodiversity and ecosystem services

Socioeconomic Baseline

- 216M population, rapid growth, 40% poverty rate
- Agriculture = 24% of GDP but under-mechanized
- Land use pressure and tenure insecurity,
- Gender/youth disparities in land, inputs, extension
- Conflict hotspots over land, water, pastoral corridors
- Infrastructure deficits (roads, storage, irrigation, power)
- Labor informality

ES 6. Key Environmental and Social Risks

AGROW is classified as **Substantial Risk** due to the scale and nature of agricultural transformation. The potential E&S risks under AGROW will arise primarily from Components 1, 2 and 3 activities and include:

Environmental Risks

- Land conversion, soil degradation, erosion
- Water pollution from fertilizers/pesticides
- Waste and effluent from agro-processing
- Biodiversity disturbance
- Air/noise pollution during construction
- Climate vulnerability of infrastructure

Social Risks

- Land acquisition, economic displacement
- Labor influx, OHS hazards, child labor
- SEA/SH and GBV risks in rural interface settings
- Exclusion of women, youth, PWDs
- Supply chain-chain risks from private off-takers (ESS9)
- Conflict over land titling
- Data privacy and digital exclusion (Component 2)

Chapter 5 applies a cross-cutting risk matrix, the mitigation hierarchy, and residual risk assessment, supported by **Annex 5** (Activity–Risk Matrix) and **Annex 12** (GBV and Social Risk Screening Tool).

ES 7. Mitigation Framework and Instruments

AGROW adopts an ESS1–ESS10-structured mitigation framework, integrating relevant E&S instruments. The ESMF embeds a multi-tiered mitigation architecture as outlined below:

1. Strategic Instruments

- **ESMF, RPF, LMP, SEP, ESCP, IPMP, SEA/SH Action Plan**

2. Sub-project Level-Level Instruments

- **ESIA / ESMP** (for Moderate/Substantial risk)
- **ESMS** (for risks related to ESS 9)
- **RAP** (for ESS5 risks)
- **Community Health & Safety Plans**
- **Biodiversity Action Plans**
- **Child labour management Plan**
- **Data Protection -Impact Assessments** (digital ecosystem)
- **Security Management Plans** (high-risk zones)

3. Contractor / Fund Manager Instruments

- **C-ESMP**
- **Worker Code of Conduct**
- **OHS Plan**
- **Waste and Pollution Control Plans**

- Annual E&S Performance Reports (ESS9 requirement)

4. Mitigation Hierarchy

1. **Avoidance** – excluding critical habitats, unsafe sites
2. **Minimization** – engineering controls, inclusive designs
3. **Mitigation** – pollution control, OHS, GBV protocols
4. **Compensation/Offsets** – livelihood restoration, biodiversity offsets

Mitigation measures are accompanied by **risk ratings, monitoring indicators, and costing principles**, with enforcement through contractual provisions and performance-based conditions.

Key annexes include:

- **Annex 13** – Generic ESMP Template
- **Annex 14** – IPMP Field Guide
- **Annex 16** – GBV/SEA-SH Action Plan Template
- **Annex 18** – Security Management Protocols
- **Annex 21** – Biodiversity Management Measures

ES 8. Institutional Arrangements and Capacity Building

Implementation of the ESMF is anchored in a clear institutional architecture outlined below:

1. Federal Level

- **FMAFS** – Lead agency
- **FPCU** – National coordination of E&S compliance
- **FMEEnv / NESREA** – Regulatory oversight, permitting, enforcement
- **World Bank** – ESF guardrail, technical review, “No Objection” authority

2. State Level

- **SPIUs** – Frontline implementers (E&S screening, field supervision)
- **SEPA**s – State level-level environmental enforcement
- **Local Governments & CBOs** – Community interface and GM first tier

3. Private Sector (ESS9)

- **ADMLF Fund Manager** – Implements ESMS, screens grantees
- **Off-takers/aggregators** – Must comply with ESF, RAP, OHS, GBV, IPMP
- **Independent Auditors** – third-party verification.

A structured capacity-building program and staffing plan ensures effective implementation, supported by **Annex 29** (Capacity Needs Assessment) and **Annex 30** (Training Logs). Institutional responsibilities are directly linked to ESCP commitments.

ES 9. Stakeholder Engagement and Grievance Management

AGROW implements a **Stakeholder Engagement Plan (SEP)** consistent with ESS10, ensuring inclusive participation of farmers, agribusinesses, women, youth, and vulnerable groups. Information disclosure follows national and WB requirements.

- A mandatory **Stakeholder Engagement Plan (SEP)** ensures inclusive, continuous consultation.
- **Targets:** ≥40% women, ≥30% youth beneficiaries.
- **Disclosure** requirements include 21-day public display (FMEEnv/SEPA/LGA) and online publication.

A **multi-tier** (community → SPIU → FPCU) effective Grievance Mechanism (GM)— which integrates specialized and confidential SEA/SH pathway—is operational at community, state, and federal levels. Supporting annexes include:

- **Annex 31** – SEP
- **Annex 34** – GM Forms
- **Annex 36** – SEA/SH Referral Pathways

ES 10. Screening, Approval, and Compliance Enforcement

Chapter 9 constitutes the **operational heart of the ESMF**, detailing the mandatory sequence of:

1. Screening
2. Scoping
3. Instrument Preparation (ESIA/ESMP/RAP/IPMP)
4. Disclosure
5. FMEnv Approval
6. World Bank No-Objection
7. Construction Monitoring

Project process flow and ESCP linkages ensure that no subproject proceeds without full E&S clearance. Key tools are provided in **Annex 11** (Screening Form) and **Annexes 37–40** (Process Flow).

1. Risk Categories

- Subprojects shall be screened and categorized - **Low/Moderate/Substantial/High**
- High Risk activities -Risk activities **not eligible** for AGROW financing.

2. Approval

- SPIU prepares instruments → FPCU review → World Bank No-Objection → FMEnv EIA Certification

3. Integration into Contracts

- E&S compliance is contractually binding, with payments linked to performance on OHS, waste, GBV, and community safety.

4. Sanctions for -Compliance

- Payment suspension
- Corrective Action Plans
- Contract termination
- Escalation to World Bank

ES 11. Monitoring, Reporting, and Budget

AGROW applies a results-oriented E&S monitoring system combining dashboards, field inspections, audits, and corrective action plans. Performance-based conditions (PBCs) link E&S compliance to disbursements.

1. Performance Indicators

- Screening coverage; ESMP implementation
- OHS compliance, incident rates
- % grievances resolved on time
- SEA/SH case management
- Beneficiary inclusion metrics

2. Reporting

- Monthly (contractors), quarterly (SPIUs), semiannual (FPCU), and incident-based (48-hour) escalation.

3. Budget

- ESMF Implementation Budget: \$3.4 million
- Capacity building (12-module curriculum): \$92,950 per cycle

Key instruments include:

- **Annex 41** – E&S Monitoring Dashboard
- **Annex 51** – Quarterly E&S Compliance Report
- **Annex 55** – Post-Construction E&S Audit Report

Adaptive management mechanisms ensure continuous improvement and risk responsiveness throughout project implementation.

ES 12. Positive Development Impacts

- Increased productivity and incomes

Nigeria Sustainable Agriculture Value Chains for Growth (AGROW) Project

- Reduced post-harvest losses
- Climate smart-smart agriculture and soil health improvements
- Enhanced market access and private investment
- Downstream job creation (women & youth)
- Improved regulatory integrity in seed/fertilizer markets
- Strengthened land tenure security
- Digitally enabled, data driven-driven service delivery
- Ecosystem restoration and reduced biodiversity degradation

ES 13. Residual Risks

Even after mitigation, some low to-to-moderate residual risks remain including-moderate residual risks remain:

- Localized construction impacts
- Minor habitat disturbances
- Social tension during land titling or cooperative formation
- Data governance-governance challenges

Addressed through **adaptive management**, continuous monitoring, and recurrent audits.

ES 14. Conclusion

The AGROW ESMF establishes a comprehensive, enforceable system for ensuring that Nigeria's agricultural modernization proceeds safely, inclusively, and sustainably. It provides:

- A robust governance framework
- Strong risk mitigation-mitigation architecture
- Clear institutional mandates
- Practical tools and instruments for field level-level implementation
- A system for accountability, transparency, and continuous improvement

Its successful implementation is central to ensuring that AGROW not only delivers productivity and market gains but also protects people, ecosystems, and social cohesion across all participating states.

Chapter 1 : Introduction and Project Overview

1.1 Background

Nigeria’s agricultural sector—encompassing crop production, livestock, forestry, and fisheries—remains a critical pillar of economic development, employment, and food security, contributing over 20 percent of GDP and providing livelihoods for a significant share of the population. Key crops include cassava, maize, yam, and sorghum, with Nigeria recognized as a leading global producer of cassava and yam. With substantial arable land and diverse agro-ecological zones, the sector has strong potential to enhance national food self-sufficiency and regional trade. Despite this potential, the sector faces persistent challenges including inadequate infrastructure, limited mechanization, climate variability, weak institutional capacity, and gaps between public policy and private sector participation. These constraints continue to limit productivity, value addition, and competitiveness, contributing to food import dependence and constrained rural incomes.

In response, the Federal Government of Nigeria, with support from the World Bank, has initiated the Nigeria Sustainable Agriculture Value Chains for Growth (AGROW) Project to promote sustainable agricultural growth, job creation, and private sector participation across priority value chains.

1.2 Project Description

The Nigeria Sustainable Agriculture Value Chains for Growth (AGROW) Project is designed to address key constraints affecting competitiveness, resilience, and private sector engagement across selected agricultural value chains. The project will be implemented in participating states and will combine public investments, policy reforms, and private-sector-oriented instruments to strengthen value chain performance. AGROW aims to improve farmer market integration, raise productivity, support value addition, create jobs—particularly for women and youth—and strengthen food and nutrition security.

The project is also expected to catalyze private investment by reducing market and regulatory risks, improving input quality, and strengthening market linkages. Overall, AGROW supports agricultural modernization, productivity enhancement, and value-added growth in line with national agricultural policies.

Environmental and Social Context of the Project

Environmental and social risks and impacts under AGROW are expected to arise primarily from Components 1, 2 and 3, reflecting the nature, scale, and delivery mechanisms of the proposed interventions.

Component 1 involves demand-driven investments in aggregation, storage, processing, and market linkages, which may give rise to localized risks related to land access, labor and working conditions, community health and safety, waste management, and stakeholder engagement.

Component 2 focuses on research, extension, technology transfer, and digital agricultural systems. While largely non-infrastructure-based, these activities involve extensive farmer interaction and field engagement, with potential social impacts including exclusion and indirect environmental impacts.

Component 3 focuses on strengthening seed and fertilizer regulatory systems and improving land tenure security to enable private investment. Risks are largely institutional and social including disputes, exclusion from project benefits, linked to regulatory enforcement and land administration processes. It also focuses on upgrading NASCs laboratories, construction of centers of excellence for seeds, and construction of a reference laboratory for fertilizer quality testing in participating states particularly where this doesn’t exist. These may give rise to localized risks related to land access, labor and working conditions, community health and safety, waste management, and stakeholder engagement

Component 4 provides coordination, oversight, and safeguards support across all components.

Annex 5 presents the **project activity mapping tool** – a matrix linking each sub-component (e.g., aggregation centers, irrigation modernization) to potential E&S risks.

1.2.1 Project Development Objectives (PDO)

The Project Development Objective (PDO) increase smallholder productivity and private sector investment in agriculture for greater food and nutrition security and job creation in participating states in Nigeria. The

Nigeria Sustainable Agriculture Value Chains for Growth (AGROW) Project

project aims to increase productivity, enhance value addition, promote private sector participation, and strengthen resilience within the agricultural sector through investments, policy support, and capacity building.

A. Project Beneficiaries

The **direct beneficiaries** of the Project are farmers (including women and youth), producer organizations and agribusiness firms (involved in commodity aggregation and/or processing), small and medium-sized enterprises (SMEs) involved in providing various services along commodity value-chains (i.e., agro-dealers, Ag Techs, etc.). **Other direct beneficiaries** include the state and federal ministries, departments and agencies (MDAs), private sector actors, and research institutions involved in the development and transfer of improved agriculture technologies and practices. Indirect project beneficiaries include rural households and communities in the project areas, farm workers, consumers, non-participating farmers and firms, financial institutions, and service providers who benefit from spillover effects, job creation, improved market functioning, and system-wide productivity and investment gains generated by project interventions.

B. PDO-Level Results Indicators (Key Performance Indicators – KPIs)

Key performance indicators will track productivity, value addition, job creation, private capital mobilization, land under improved management, inclusion of women and youth, and strengthened food and nutrition security. Detailed indicators are presented in Chapter 2.

C. Direct Investment Components and Priority Value Chains

AGROW supports priority value chains selected based on comparative advantage, food security relevance, and employment potential, including rice, cassava, maize, soybean, cocoa, and cashew. Detailed component and value chain descriptions are provided in Chapter 2.

1.3 Objective and Rationale of the Environmental and Social Management Framework

The Environmental and Social Management Framework (ESMF) provides the guiding framework for identifying, assessing, and managing environmental and social (E&S) risks associated with AGROW subprojects. Given that specific subproject locations and designs will be finalized during implementation, the ESMF establishes procedures for screening, risk categorization, preparation of site-specific instruments (ESIA, ESMP, RAP), and monitoring in line with national regulations and the World Bank ESF.

1.4 Methodology and Work Approach

The ESMF was prepared through a structured and participatory process consistent with the World Bank Environmental and Social Framework, Nigerian regulatory requirements, and international good practice. This included literature review, stakeholder consultations at federal and state levels, baseline data review, and identification of potential environmental and social risks and mitigation measures. Detailed methodology is summarized in **Annex 2**.

Chapter 2 Project Description

2.1 Overview of the AGROW Project

The Nigeria Sustainable Agriculture Value Chains for Growth (AGROW) Project is a six-year Investment Project Financing (IPF) operation designed to support sustainable agricultural development through targeted public investments, private sector engagement, and policy reforms. The project seeks to enhance competitiveness and resilience across selected agricultural value chains while promoting inclusive growth, job creation, and food and nutrition security. AGROW will be implemented at federal and state levels, with interventions tailored to the comparative advantages and readiness of participating states.

The Project Development Objective (PDO) is to increase smallholder productivity and private sector investment in agriculture for greater food and nutrition security and job creation in participating states in Nigeria. To monitor achievement of the PDO, the project will track the key performance indicators presented in Table 2.1

Table Project Description .1: Key Performance Indicators and Measurement Focus

Key Performance Indicator (KPI)	Description / Measurement Focus
Number of project beneficiaries, including % of women and youth	Measures inclusiveness and gender equity in project reach
Increase in productivity of agricultural produce by supported farmers	Assesses yield improvement and efficiency in production
Increase in processed agricultural output by project beneficiaries	Tracks value addition and market competitiveness
New or improved jobs created within targeted value chains	Reflects employment outcomes, particularly for women and youth
Number of people with strengthened food and nutrition security	Measures contribution to household and community food resilience
Private capital mobilized for agricultural investment	Captures leveraged private sector financing and partnerships
Land (hectares) under improved management or conservation	Assesses environmental sustainability and land restoration efforts
Number of people with formally secured land rights	Tracks progress in tenure security and access to productive assets

These indicators align with the project’s development objectives and the World Bank’s Environmental and Social Framework (ESF) requirements for measurable, inclusive, and sustainable results.

2.2 Project Components

The Project comprises four components and is expected to be implemented over a period of six years. These include: (i) De-risking Private Sector Investments in Aggregation and Offtake of Smallholder Commodities; (ii) Public investments for modernizing smallholder production; (iii) Policy and Enabling Environment for Private Investment in Inputs Markets; and (iv) Project coordination, monitoring and evaluation.

Component 1: De-risking Private Sector Investments in Aggregation and Offtake of Smallholder Commodities

This Component aims to reduce the risks and transaction costs that hinder offtakers - such as aggregators, and processors - from sourcing reliably, and at scale, from Nigeria’s fragmented smallholder farmer base across the rice, maize, cassava, and soy value chains. Based on consultations with offtakers, these risks include: (i) low and inconsistent volumes; (ii) variable quality arising from differences in production practices and inputs; (iii) high aggregation costs due to dispersed farmers, exacerbated by the lack of reliable data on who farmers are, what they produce, and where they are located; and (iv) lack of aggregation and postharvest handling infrastructure, *inter alia*. These risks undermine the ability of offtakers to expand their capacity and the development of commercially viable value chains. The resulting thin market suppresses smallholder

incentives to invest in productivity-enhancement, regardless of the technical potential for higher yields. Ultimately, these compounding issues collectively stifle job creation and food security.

In this context, under this Component, AGROW will finance investments needed to: (i) improve the volume, consistency and quality of smallholder commodity supply; (ii) lower aggregation costs for off-takers; and (iii) increase the share of farmers participating in structured predictable and transparent markets. The component will support the scaling of commercially viable smallholder aggregation models that bring together off-takers and smallholder farmer collectives into mutually beneficial arrangements. To be eligible for support, off-takers in these partnerships must be private, commercially viable, and demonstrate the capacity to provide essential bundled services (e.g., business development services, input and technology support, aggregation and storage, value addition) to the smallholders, while the smallholder collectives would have to maintain a market-oriented focus.

Support will be provided through demand-driven and competitive performance-based matching grants to be delivered via the Agribusiness De-risking and Market Linkage Facility (ADMLF) - a catalytic mechanism to be set up under AGROW with the primary objective of strengthening and scaling of "productive linkages" between smallholder farmers and off-takers. The ADMLF is designed to support private, commercially viable off-takers as the primary grant recipients, while making demonstrable benefits to smallholder farmers a binding condition for eligibility and disbursement. Grant disbursements will be linked to the achievement of clearly defined and independently verified results, rather than reimbursing inputs or expenditures. Grant support will be based on joint business plans between smallholder collectives and the off-taker. By combining targeted public co-financing with private investment, the ADMLF will reduce off-taker sourcing risks, crowd in private capital, and scale inclusive business models that improve aggregation, post-harvest management and processing, and smallholder market access in the targeted value chains. The ADMLF will adopt a flexible approach to grant sizes, matching levels and performance targets to accommodate varying off-taker scale, value chain specificities, operational capacity, and the ability to achieve project outcomes.

Consistent with good international practice for competitive grant facilities, the ADMLF will be managed by a dedicated Fund Manager. The Fund Manager will maintain a permanent presence in participating states, engage regularly with state-level counterparts, and report to the Project Steering Committee. Responsibilities include: (i) promotion and outreach to agribusinesses, cooperatives, and relevant public institutions; (ii) technical, financial, and economic appraisal of applications; (iii) identification and mitigation of fiduciary risks and conflicts of interest; (iv) verification and control of fund use; (v) monitoring, evaluation, and documentation of lessons learned; (vi) fiduciary oversight; and (vi) ESF compliance of sub-projects in line with the Matching Grants Operations Manual.

Component 2: Public Investments for Modernization of Smallholder Production

Modernization of smallholder production is a pre-condition for sustainable offtake relationships and functioning of agricultural markets. While offtake arrangements as supported in Component 1 can connect farmers to markets, without on-farm modernization, they cannot deliver reliability, quality or scale. Without modernization for example, smallholder farmers, cannot reliably produce the volumes required under offtake agreements, they produce inconsistent and unacceptable quality, and offtake models cannot reach the scale needed to transform value chains or justify continued private investment. Component 2 finances investments necessary to raise productivity, strengthen resilience of farmers, and leverage private sector participation along selected value chains. The component is structured around two sub-components: (i) strengthening research, extension, and skills for technology development and transfer; (ii) strengthening the digital agricultural ecosystem.

Sub-Component 2.1: Strengthening Research, Extension, Technology Transfer Systems

This sub-component will support the generation - including development and adaptation - and transfer of technologies and practices required by smallholders targeted by the Project to increase productivity, and meet off-taker quality specifications, while adapting to climate change. Among others, the technologies to be financed include: (i) improved seed/germplasm (e.g., drought-tolerant varieties for rice, maize, cassava, and soy, flood tolerant rice varieties); (ii) improved management practices (fertilizer recommendations, Urea Deep Placement in rice to reduce greenhouse gas – GHG - emissions from rice production, efficient irrigation

practices, etc.); and improved postharvest handling technologies and practices, including bio-fortified products for maize and soy (for better nutrition).

The Project will strengthen partnerships between the National Cereals Research Institute (NCRI), international research institutes (e.g., the International Institute of Tropical Agriculture – IITA, in the case of cassava, maize, and AfricaRice in the case of rice), AgTech firms, agro-dealers, and seed producers to align capabilities and incentives, and ensure that research outputs are translated into market-ready products and scaled. In the specific case of seed technology, the project will strengthen coordination mechanisms, between research, National Agriculture Seed Council (NASC), private seed multipliers and seed-grower associations, to ensure that varietal development, and Early-Generation Seed (EGS) supplies, are consistent with market demand.

Technology transfer under this sub-component will be delivered through a public dissemination pathway designed to expand awareness and uptake of validated technologies beyond the immediate commercial networks supported under Component 1. The project will strengthen federal and state extension delivery systems, including farmer field schools, lead farmers, and demonstration plots, to showcase technologies validated through the research pipeline. Recognizing that sustained adoption is most effectively driven through market linkages, public dissemination will focus on broad outreach, awareness, and demonstration. Performance under this pathway will be tracked through an output level Performance-Based Condition (PBC1) - “reach of public sector extension services” designed to measure the absolute number of unique smallholder farmers participating in offtake arrangements as defined in Component 1, who are directly reached with improved technologies/practices by the public extension system. Use of this PBC is justified on the basis that limited extension agent outreach is the primary constraint of Nigeria’s extension system and that prioritizing this metric incentivizes system expansion, discourages inefficient practices - such as repeated visits to the same farmer, and encourages efficient use of scarce extension resources. Expenditures associated with this PBC include extension agent mobility, demonstration costs, and costs of digital platforms, etc.

Sub-Component 2.2: Strengthening the Digital Agricultural Ecosystem

Support under this subcomponent will go towards strengthening Nigeria’s digital agricultural ecosystem. A strong digital ecosystem will support modernization of smallholder production by reducing transaction costs system-wide, multiplying the reach of advisory services by enabling data-driven advisory, enabling adoption of improved inputs and practices, crowding-in of private innovation, facilitating access to mechanization and shared services, improving access to finance, and enabling climate-smart production by improving access to climate intelligence/weather advisories, among others.

First, support will be provided to establish the foundational digital stack, consisting of a national digital farm and farmer registry and updated digital soil and weather information systems. Project support will finance: (i) digital infrastructure required to host this foundational data, including the design of standardized data-collection tools, alignment with Nigeria’s digital ID architecture, and technical assistance for registry governance, quality control, and initial data population - targeting about 200,000 farmers/farms (i.e., about 20 percent of project-supported beneficiaries); (ii) an update of the digital soil map using modern sampling, crop response trials, and analytics, informed by technical inputs from IITA’s Regional Hub for Fertilizers and Soil Health; and (iii) strengthening of AI-powered weather forecasting capabilities at NiMet to ensure the availability of accurate, localized weather forecasts for farmer advisory services. Together, the registry, soil map, and weather forecasts will provide the base layer needed for other digitally-enabled services.

Building on the foundational data, the Project will support the development of data-sharing protocols and interoperability mechanisms that allow secure, permission-based access by private offtakers, Ag-tech firms, processors, input suppliers, and state-level systems. The project will provide technical assistance to the government to define interoperability standards, establish Application Programming Interfaces (APIs), develop data-governance frameworks, and ensure that the farmer registry and soil and weather information systems can interface with third-party digital solutions. These protocols will expand the utility of the foundational datasets and catalyze private-sector innovation by ensuring that credible, updated farmer and soil data can be integrated into bundled input credit systems, crop insurance products, traceability tools, and digital extension platforms.

Finally, the Project will support the development of user-facing applications and service delivery interfaces that translate the foundational digital stack into real accessible services for value chain actors. The project will

develop a unified national digital advisory platform capable of high-volume dissemination through SMS, IVR, WhatsApp, and radio, beginning with weather advisories as a scalable entry point, given strong farmer demand, clear evidence of high returns, and NiMet’s growing AI capabilities. The platform will be extended to serve as a unified agribusiness platform through which farmers will be able to access advisories on weather, agronomy, and markets, receive weather-based alerts, and obtain tailored extension messages. The platform will also support traceability requirements for commodities such as soybeans. Off-takers, processors, cooperatives, and ag-tech firms will benefit from the ability to integrate with the platform to deliver advisory services, input bundles, and market-linkage tools directly to registered producers. The project will also use the digital platform to pilot a simple parametric weather insurance, including time-bound premium support, by partnering with existing insurers and fintech providers. The weather risk insurance scheme will target smallholder farmers in cooperatives. If successful, the risk instrument will be rolled out with support of the ADMLF under Component 1. The delivery of digital user-interface will largely be driven by private-sector providers integrated through the platform. Off-takers, processors, cooperatives, and ag-techs will benefit from the ability to integrate with the platform to deliver advisory services, input bundles, off-take contracts, and market-linkage tools directly to registered producers anchoring digital services in commercial demand. The national farmer registry, digital soil map, and interoperability frameworks will enable participating agribusinesses, financial institutions, insurers, and off-takers to integrate verified farmer data into credit assessment, insurance, traceability, and off-take arrangements, reducing transaction costs and investment risk. IFC will support the use of these digital assets to strengthen commercial due diligence, structure bankable aggregation and off-take models, and link ADMLF-supported partnerships to private financing solutions. Coordination with other WBG/Development Partner supported projects in irrigation, mechanization, processing, energy, and post-harvest handling will improve supply reliability and quality, ensuring that ADMLF operates within a digitally enabled, market-oriented ecosystem capable of sustaining private investment beyond the life of the project.

Component 3: Policy and Enabling Environment for Private Investment in Inputs Markets and Land Tenure Security

Component 3 will strengthen the enabling environment for private investment in Nigeria’s input markets, with a focus on addressing the systemic constraints that limit the production, quality, and adoption of improved seed and fertilizer inputs. This subcomponent therefore targets the upstream regulatory and institutional bottlenecks that determine whether private firms can deliver high-quality, productivity-enhancing inputs at scale.

Early-Generation Seed: Limited availability of EGS is a systemic bottleneck that raises risk, increases costs, constrains scale, slows varietal turnover and market development, discourages entry and competition, and weakens confidence in Nigeria’s seed systems. Without reliable, timely, and competitive EGS supply, private investment in certified seed production remains cautious, small-scale, and under-diversified, regardless of downstream demand. To expand the availability of high-quality, and climate resilient EGS and enable private seed companies to scale certified seed production, the project will promote a more commercial and coordinated EGS production system. Support will focus on establishing structured collaboration between research institutions and private seed companies to jointly plan, produce, and supply foundation seed for priority value chains. This will include developing clear licensing arrangements, transparent production and pricing frameworks, and annual EGS production schedules aligned with market demand. Expected expenditures include infrastructure for seed multiplication (including rapid multiplication technologies for cassava), irrigation, storage facilities, training, quality assurance, logistics and distribution, etc. By building a stronger, more predictable EGS pipeline, the project will crowd in private investment and enable seed companies to produce and market certified seeds at scale. The Project will focus on EGS for rice and cassava where the widest gaps exist, with priority accorded to drought and flood-tolerant varieties to build farmers’ resilience to climate change.

Seed regulatory systems. Seed is a credence good¹ – farmers cannot verify quality at purchase – and therefore, credible certification is essential for private firms to invest in the sector with confidence. Where quality certification is weak, private sector investment in seed production becomes high-risk and low-return, leading

¹ Goods whose quality cannot be assessed objectively and reliably, necessitating the development of tools such as tests and quality standards to foster transparency and trust among consumers.

to underinvestment and stagnation. Indeed, due to inadequate capacity to inspect and certify seed produced by the private sector, Nigeria has often relied on production quotas that effectively limit the volume of seed private producers are permitted to produce. These quotas reflect the constraints of the public certification system rather than market demand as they are set at levels commensurate with what government agencies can realistically certify given existing capacity limitation. Additionally, even when Nigeria adopted ECOWAS Regulation C/REG.4/05/2008 which facilitates the cross-border movement of certified seeds in West Africa, without requiring re-certification or additional testing, current variety release procedures still undermine the import of seeds from within the ECOWAS region. This constrains private investment as it slows market development and limits access to innovation.

To improve seed quality and strengthen the overall seed regulatory system, the project will support the NASC to implement a modern, risk-based certification and quality assurance framework. Interventions will include: (i) operationalizing guidelines for third-party seed quality certification; (ii) expanding the use of SEEDCODEX, a barcode-based seed authentication system that allows farmers, dealers, and regulators to verify seed quality in real time; and (iii) developing regulations to decentralize seed inspection and certification to accredited entities to increase coverage and reduce bottlenecks. Additionally, the project will support the simplification of ECOWAS-aligned variety release procedures to accelerate the introduction of regionally certified improved varieties into the country. PBC4 “adoption and implementation of seed sector regulations to boost private investment in seed production” will incentivize NASC to adopt and implement the seed sector regulations to boost private sector investment in the seed supply chain. The project will cover costs related to drafting the necessary regulations, stakeholder consultations, legal vetting, issuance of implementation instrument, etc. Up to US\$2.0 million is allocated to this PBC. The project will also finance technical assistance, institutional capacity building, and rationalized upgrades to NASC’s laboratories, including a center of excellence for seed technology and a seed bank and necessary laboratory equipment, related infrastructure to ensure that certified seed reaching farmers is reliable, traceable, and compliant with national and regional standards.

Fertilizer quality regulation: To strengthen fertilizer quality assurance, the project will support the Farm Inputs Support Services (FISS) Department within the Federal Ministry of Agriculture and Food Security (FMAFS) to modernize Nigeria’s fertilizer regulatory system and improve enforcement capacity. Support will include the development and piloting of fertilizer labeling technologies, formulation of guidelines for third-party fertilizer inspection, and technical assistance to operationalize these systems across key fertilizer-producing and distribution hubs. The project will also finance upgrades and/or construction of a reference laboratory, and up to 5 laboratories for fertilizer quality testing to enhance the accuracy and reach of regulatory oversight. Together, these investments will reduce adulteration, enhance farmer confidence in fertilizer products, and create a more predictable and trustworthy environment for private investment in blending, manufacturing, and distribution. PBC5 “fertilizer quality compliance” will incentivize and measure the effectiveness of official fertilizer quality labels in assuring quality of fertilizer. The PBC measures the percentage of fertilizer bags sampled in the market that carry the official quality compliance label and are verified to meet declared nutrient specifications.

Strengthening land tenure security. Land tenure security is foundational to the success of smallholder offtake arrangements because it underpins farmers’ incentives, offtakers’ risk management, and the durability of supply relationships. Where land rights are insecure or unclear, offtake models become short-term, high-risk, and difficult to scale. The project will incentivize the public sector to issue certificates of occupancy, to farmers and offtakers supported under Component 1, including women and youth.

Component 4: Project Coordination, Monitoring and Evaluation

This component will focus on all aspects of project management, including fiduciary and safeguards compliance, Monitoring and Evaluation (M&E), knowledge management, gender, and communications. The support will include, among others: (i) the operational costs for project management both at federal and state level; (ii) Environmental and Social activities designed to monitor and comply with the requirements of the Bank’s Environmental and Social Framework (ESF); (iii) Monitoring and Evaluation (M&E) including impact evaluation to be designed and implemented by the Gender Innovation Lab (GIL) – using its own trust-fund resources, among others; (iv) communication and knowledge management of project activities; and (v)

citizen engagement activities and the Project's Grievance Mechanism (GM). This component will also cover costs related to independent verification of PBCs.

2.3 Project Component Environmental and Social Relevance and Streamlined Activities

2.3.1 Component 1: De-risking Private Sector Investments in Aggregation and Offtake

Component 1 aims to reduce risks and transaction costs faced by agribusinesses, processors, and off-takers sourcing from smallholder farmers. The component will support structured market linkages between organized farmer groups and eligible off-takers through performance-based matching grants. Eligible investments may include aggregation and storage facilities, processing equipment, logistics infrastructure, quality control systems, and digital traceability tools. Inclusive participation of women and youth will be promoted through eligibility criteria and targeted support measures.

Environmental and Social Relevance:

Potential E&S risks include land acquisition and access, labor and working conditions, occupational health and safety, waste and pollution management, community health and safety, stakeholder engagement, and SEA/SH risks linked to labor influx. These risks will be addressed through screening and preparation of site-specific ESMPs, ESIAAs, and RAPs where required.

Key Challenges includes:

- Fragmented supply chains and lack of structured contracts.
- Power dynamics relating to the disbursement of the ADMLF
- Limited on-farm and post-harvest infrastructure.
- Weak collective organization among smallholders.
- Market exclusion for women and youth.

Strategic Approach:

- The fund manager of the ADMLF once identified, will be required to develop / update an Environmental and Social risk Management System (ESMS) that is consistent with the requirements of ESS9 prior to accessing the funding
- Establish Agribusiness De-risking and Market Linkage Facility (ADMLF) to channel support through competitive, performance-based matching grants.
- Combine public co-financing with private investment to reduce sourcing risks and scale inclusive business models.
- Focus on priority value chains (rice, maize, cassava, soy).

Implementation Mechanism:

- The private sector off takers will be required to follow the fund manager ESMS requirements.
- Performance-Based Matching Grants for off-takers partnering with farmer cooperatives.
- Support for business development, input acquisition, and infrastructure (storage, agro-processing, value addition).
- Flexible grant sizes and matching levels tailored to commodity and operational scale.
- Funds released in tranches after milestone verification.
- Eligibility is tied to joint business plans with cooperatives; detailed procedures in ADMLF Grant Procedures Manual and Matching Grants Operations Manual.

Management Arrangements:

- Dedicated Fund Manager with permanent presence in participating states.
- Responsibilities: outreach, appraisal, fiduciary oversight, ESF compliance, and reporting to the Project Steering Committee.

Expected Outcomes:

- Improved Market Access: 30–40% increase in smallholder participation in formal markets.
- Enhanced Aggregation Capacity: Establishment or upgrade of aggregation centers and storage facilities.
- Value Addition: Increased processing capacity reducing post-harvest losses by 20–30%.
- Inclusive Growth: Greater involvement of women and youth in higher-value segments.

- Private Sector Leverage: Mobilization of significant private investment alongside public co-financing.
- Risk Reduction: Lower transaction costs and sourcing risks for off-takers.

2.3.2 Component 2: Public Investments for Modernization of Smallholder Production

Component 2 supports productivity and resilience of smallholder farmers through public investments in research, extension services, the roll-out of farmer field schools, lead farmers, demonstration plots, and digital agricultural systems. Sub-components include support for agricultural research and innovation, extension system strengthening, seed and fertilizer quality improvement, and digital advisory services. Capacity building will be provided to farmers and extension agents to support adoption of improved technologies and practices.

Environmental and Social Relevance:

Risks under this component are primarily social and indirect environmental risks, including occupational health and safety during field activities, data privacy and inclusion risks linked to digital systems, potential exclusion of vulnerable groups such as women, elders, remote communities, people with disabilities, and those with low digital literacy, potentially increasing inequalities and limiting project and cumulative environmental effects of increased input use. These risks will be managed through good practice guidelines, ESMPs, and stakeholder engagement measures.

Key Challenges includes:

- Limited access to climate-smart technologies.
- Weak extension and research systems.
- Digital infrastructure gaps for agricultural services.

Strategic Approach:

- Strengthen research, extension, and technology transfer systems.
- Build a three-layer digital architecture for farmer registry, soil maps, and advisory platforms.
- Promote partnerships between research institutions and private sector actors.
- Ensure digital solutions are accessible and inclusive

Implementation Mechanism:

- Sub-component 2.1: Develop and disseminate high-yielding, climate-smart technologies.
- Sub-component 2.2: Establish foundational digital stack, interoperability standards, and user-facing advisory platforms.
- Performance-Based Conditions: PBC1 for technology dissemination; PBC2 for farmer registry coverage.

Management Arrangements:

- Federal and state-level collaboration for implementation and governance.
- Integration with Agricultural Development Programmes (ADPs) for last-mile delivery.

Expected Outcomes:

- Improved productivity and resilience of smallholder farmers.
- Expanded adoption of climate-smart technologies.
- Operational digital platforms serving millions of farmers with advisory services.
- Enhanced data-driven decision-making for agribusinesses and policymakers.

2.3.3 Component 3: Policy, Regulatory, and Institutional Reforms

Component 3 supports policy, regulatory, and institutional reforms to improve the enabling environment for agricultural investment. Activities include strengthening seed and fertilizer regulatory systems, improving land administration and tenure security, enhancing inter-agency coordination, upgrading of NASCs laboratories, construction of centers of excellence for seeds, and construction of a reference laboratory for fertilizer quality testing in participating states particularly where this doesn't exist.

Environmental and Social Relevance:

Risks are largely institutional and social, associated with regulatory enforcement, land administration processes, and stakeholder trust. These will be managed through inclusive consultation, transparency measures, and alignment with ESS10 and ESS5 requirements.

Key Challenges:

- land acquisition and involuntary resettlement
- Weak seed and fertilizer quality assurance systems with risk of exclusion from project benefits.
- Limited availability of Early Generation Seed (EGS).
- Uncertainty over land tenure rights discouraging investment.

Strategic Approach:

- Site-specific RAPs are prepared where required prior to implementation of project activities requiring land acquisition
- Expand EGS production and certification.
- Modernize seed and fertilizer regulatory frameworks.
- Promote issuance of certificates of occupancy for farmers and cooperatives.

Implementation Mechanism:

- Support National Agricultural Seeds Council (NASC) for seed sector reforms and quality assurance.
- Support Farm Inputs Support Services (FISS) for fertilizer labeling and inspection systems.
- Incentivize states to issue land tenure certificates through PBC6.

Management Arrangements:

- Federal agencies (NASC, FISS) for regulatory reforms.
- State governments for land tenure reforms and implementation.

Expected Outcomes:

- Expanded Early Generation Seed (EGS) availability for private seed multipliers.
- Improved seed and fertilizer quality assurance systems.
- Increased issuance of land tenure certificates to farmers and cooperatives.
- Enhanced private sector confidence and investment in input markets

2.3.4 Component 4: Project Coordination, Monitoring, and Evaluation

Component 4 provides support for project coordination, fiduciary management, monitoring and evaluation, environmental and social risk management, and stakeholder engagement. The component finances the operational costs of the Federal Project Coordination Unit (FPCU) and State Project Implementation Units (SPIUs).

Environmental and Social Risks

This component is critical for effective implementation of the ESMF, including screening, supervision, monitoring, reporting, and capacity building.

Key Challenges includes:

- Need for strong coordination across federal and state levels.
- Monitoring and evaluation gaps for tracking project impact.
- Limited capacity for citizen engagement and grievance redress.

Strategic Approach:

- Establish Federal Project Coordination Unit (FPCU).
- Implement robust M&E systems including impact evaluation by Gender Innovation Lab.
- Strengthen communication, knowledge management, and Grievance Mechanisms.

Implementation Mechanism:

- Coordinate project activities across states through State Project Implementation Units.
- Finance operational costs, ESF compliance, and citizen engagement activities.
- Ensure synergy with other infrastructure projects to minimize gaps.

Management Arrangements:

- FPCU for oversight and coordination.
- State-level MDAs for implementation and monitoring.

Expected Outcomes:

- Improved project governance and accountability.
- Effective monitoring and evaluation of project results.
- Enhanced stakeholder engagement and grievance redress.
- Knowledge sharing and gender-responsive implementation.

2.4 Project Components and Corresponding Key Activities

Component 1 — De-risking Private Sector Investments in Aggregation & Offtake

Key activities to be delivered through the Agribusiness De-risking & Market Linkage Facility (ADMLF):

- Establish/upgrade aggregation centers (collection, weighing, grading).
- Construct/rehabilitate storage and cold chain assets (silos, warehouses, modular cold rooms).
- Install small/medium agro-processing units (rice milling, cassava processing, oilseed crushing, maize drying).
- Provide post-harvest assets (threshers, shellers, dryers, moisture meters, pallets, forklifts).
- Develop quality/traceability systems (barcode/QR, batch records, aflatoxin testing, SOPs).
- Facilitate inclusive supply contracts with cooperatives (pricing, volumes, delivery windows; women/youth participation).
- Deliver business development services (BDS) and training (quality standards, logistics, financial literacy).
- Enable last-mile logistics and internal yard/traffic improvements within sites (coordination with other projects for external roads).

Component 2 — Public Investments for Modernization

Sub-component 2.1: Research, Extension & Technology Transfer

- Adaptive research and trials for climate-smart technologies (SRI, UDP; improved varieties; cassava rapid multiplication).
- Seed system coordination with NASC and private seed companies (EGS pipeline; breeder/foundation seed production).
- Establish and operate demonstration plots and farmer field schools; develop extension content and lead farmer networks.
- Training of extension agents; women-focused outreach; youth agripreneur programs.
- Acquire small equipment and inputs for trials (soil testing kits, PPE, precision planters)

Sub-component 2.2: Strengthening the Digital Agricultural Ecosystem

- Build national digital farm and farmer registry (enumeration, verification; align with national digital ID).
- Update digital soil maps (sampling, crop response trials, analytics with IITA Hub).
- Strengthen NiMet AI-based weather forecasting and interfaces.
- Develop data-sharing and interoperability (APIs, standards, governance).
- Deploy a user-facing advisory platform (SMS/IVR/WhatsApp/radio; weather, agronomy, market advisories; traceability).

Component 3 — Policy & Enabling Environment for Inputs Markets and Land Tenure

- Establish structured Early-Generation Seed (EGS) collaboration (licensing, production schedules; private multipliers).
- Upgrade NASC labs and seed bank; roll out SEEDCODEX/barcode authentication; decentralize inspection.
- Strengthen FISS fertilizer regulation (labeling technologies; third-party inspection; build/upgrade reference and regional labs).
- Implement land tenure reforms with states; issue certificates of occupancy to beneficiaries and cooperatives (including women/youth).

Component 4 — Project Coordination, Monitoring & Evaluation

- Stand-up FPCU with ESF specialists (environment, social, gender/SEA-SH, OHS, M&E, communications).
- Operate a multi-tier GM (federal/state; digital and in-person; SEA-SH-sensitive channels).
- Conduct ESF capacity building for PIUs, states, off-takers, and cooperatives.
- Environmental and social monitoring (audits, supervision, incident management).
- Execute impact evaluations (e.g., GIL), knowledge products, and communications strategy.
- Coordinate with infrastructure projects (roads, energy, digital connectivity) to minimize cumulative impacts.

Table Project Description .2: Indicative Matrix of AGROW Project Activities

Project Component	Indicative Activities	Environmental & Social Considerations
Productivity Enhancement	Input distribution, extension training, mechanization support	Soil fertility, pesticide management, farmer safety
Market Access & Infrastructure	Feeder road rehabilitation, irrigation systems, storage construction	Land acquisition, resettlement, dust/noise control
Value Chain Development	Establishment of processing centers, packaging, transport systems	Waste management, energy use, employment conditions
Institutional Strengthening	Capacity building, research partnerships, data management systems	Inclusion, gender balance, accountability
Social Inclusion & Livelihood Support	Women/youth empowerment, livelihood grants, cooperative support	Gender equity, vulnerable group support, grievance redress
Project Management	Monitoring, E&S audits, disclosure, reporting	Transparency, compliance with ESS standards

2.5 Participating States, Priority Agricultural Value Chains and Comparative Advantage

The project will be implemented in selected states based on eligibility criteria including agricultural potential, reform commitment, and implementation readiness. Participating states will be confirmed in accordance with agreed selection criteria and readiness assessments. The AGROW Project targets strategic agricultural value chains based on comparative advantage, contribution to food security, and export potential across Nigeria’s six geopolitical zones. While Table 2.3 present priority value chains and comparative advantage by region, **Annex 6** presents map of participating states and value chain hotspots – detailed geographic data on priority agricultural zones (e.g., rice in Kano, tomato in Kaduna).

Table Project Description .3: Priority Value Chains and Comparative Advantage by Region

Geopolitical Zone	Priority Crops / Value Chains	Comparative Advantage / Rationale	Export / Food Security Orientation
North West	Rice, Maize, Groundnut, Tomato, Cotton	Favorable climate and irrigation potential along River Sokoto and Kano Plains; strong smallholder base	Food security and export (cotton, tomato paste)
North East	Sorghum, Sesame, Cowpea, Livestock	Suitable for dryland agriculture; strong livestock corridor	Food security and export (sesame, livestock)
North Central	Cassava, Yam, Soybean, Rice	Rich agro-ecological conditions; proximity to major markets	Food security and industrial processing
South West	Cocoa, Cassava, Poultry, Maize	Coastal export access; established processing industries	Export (cocoa) and food security (cassava, poultry)
South East	Oil Palm, Cassava, Rice, Vegetables	Favorable rainfall; presence of agro-processing SMEs	Food security and industrial use
South South	Oil Palm, Rubber, Fishery, Plantain	High rainfall and fertile delta soils; aquaculture expansion	Export and livelihood support

Chapter 3 : Legal, Policy and Institutional Framework

3.1 Introduction

This chapter sets out the Nigerian legal and institutional requirements and the applicable World Bank Environmental and Social Framework (ESF) standards for the AGROW Project. It defines the approvals, instruments, and responsibilities needed to assess, prevent, and manage environmental and social (E&S) risks across planning, construction, and operations.

3.2 Legal and Administrative Framework

The AGROW Project involves inter-ministerial activities. Key administrative structures and mandates are summarized below:

3.2.1 Federal Ministry of Agriculture and Food Security (FMAFS)

The Federal Ministry of Agriculture and Food Security (FMAFS) is the lead policy and coordinating institution for the AGROW Project, providing strategic oversight and ensuring alignment with national agricultural, food security, and sustainability policies. The Project operationalizes FMAFS policy objectives on productivity enhancement, value chain development, climate-smart agriculture, private sector participation, and inclusive growth, while ensuring compliance with national regulations and World Bank Environmental and Social Standards.

Relevance to the AGROW Project:

The AGROW Project operationalizes the mandate and policy objectives of the Federal Ministry of Agriculture and Food Security (FMAFS) by supporting coordinated federal–state implementation, enhancing agricultural productivity and priority value chains, and contributing to national food and nutrition security. The Project promotes climate-smart and sustainable agricultural practices, facilitates private sector participation and agribusiness development, and strengthens institutional capacity for service delivery and results monitoring.

In collaboration with FMEnv and NESREA, FMAFS ensures that AGROW activities comply with national environmental regulations and the World Bank Environmental and Social Standards through effective implementation of the ESMF, ESCP, and related safeguards instruments.

3.2.2 Federal Ministry of Water Resources (FMWR)

The Federal Ministry of Water Resources (FMWR) provides the national policy, regulatory, and institutional framework governing water resources management that underpins AGROW-supported irrigation, water abstraction, drainage, and water-dependent agricultural activities. Through the National Water Policy, Water Resources Decree No. 101 of 1993, and the National Irrigation and Drainage Policy, FMWR ensures that agricultural water use under AGROW is efficient, equitable, climate-resilient, and aligned with Integrated Water Resources Management (IWRM) principles. The Ministry’s oversight of River Basin Development Authorities, water allocation, flood and drought risk management, water quality protection, and hydrological monitoring supports sustainable agricultural productivity while safeguarding water resources, ecosystems, and community health.

These functions are directly relevant to AGROW’s objectives on climate-smart agriculture, resource efficiency, environmental sustainability, and compliance with national regulations and World Bank Environmental and Social Standards.

3.2.3 Federal Ministry of Environment (FMEnv)

The AGROW Project operates within the national environmental framework established by FMEnv. In particular:

- FMEnv provides the legal and policy basis for **environmental and social risk assessment** of AGROW-supported activities, including agricultural production, agro-processing, irrigation, storage, and associated civil works.
- Compliance with the **EIA Act**, FMEnv guidelines, and NESREA regulations ensures that AGROW activities meet national environmental standards.

- FMEnv leadership on climate change, biodiversity conservation, pollution control, and sustainable land and water management aligns directly with AGROW objectives on climate-smart agriculture and environmental sustainability.
- Through coordination with FMAFS, FMWR, NESREA, and State Environmental Protection Agencies (SEPA), FMEnv supports effective implementation of AGROW safeguards instruments, including the **ESMF, ESCP, SEP, LMP, RPF, and GBV Action Plan**.
- Where national requirements differ from World Bank Environmental and Social Standards, AGROW applies the more stringent provisions to ensure full compliance to manage the environmental and social risks to people and the environment.

3.2.4 State Environmental Agencies

Institution	Harmonized ESMF Role (FMEnv–State Alignment)
State Environmental Protection Agencies (SEPA)	Implement and enforce FMEnv environmental policies, laws, and standards at the state level; ensure compliance with national and state environmental requirements under the ESMF; monitor and report on environmental performance of project activities; support FMEnv in environmental compliance oversight.
State Waste Management Agencies (SWMA)	Implement FMEnv and state solid waste management policies under the ESMF; regulate and manage solid waste collection, transportation, treatment, and disposal; operate approved dumpsites and facilities; accredit and supervise private waste service providers in line with ESMF requirements.

3.2.5 Key Relevant National Policies and Regulations

▪ National Water Policy / National Water Supply and Sanitation Policy

The National Water Supply and Sanitation Policy provides the framework for ensuring equitable access to safe, affordable, and sustainable water supply and sanitation services in Nigeria through participatory involvement of federal, state, local governments, the private sector, and communities. The policy promotes defined water consumption standards for rural, semi-urban, and urban areas, adherence to WHO potable water quality standards, protection of water resources, and institutional capacity building.

Relevance to AGROW: Guides water abstraction, irrigation, agro-processing, and sanitation-related activities, ensuring sustainable water use and protection of community water needs (ESS3).

▪ Water Resources Decree No. 101 of 1993

This Decree vests ownership and control of all surface and groundwater resources in the Federal Government and regulates their development, use, and management, particularly for water bodies affecting more than one state.

Relevance to AGROW: Provides the legal basis for permits and regulatory compliance for irrigation schemes, water abstraction, and water infrastructure under the project (ESS1, ESS3).

▪ Natural Resources Conservation Council Act No. 286 of 1990

The Act establishes the Natural Resources Conservation Council with responsibility for formulating national policies and strategies for the conservation and sustainable use of Nigeria’s natural resources.

Relevance to AGROW: Supports sustainable land, soil, water, and biodiversity management practices promoted under agricultural value chain activities (ESS1, ESS6).

▪ National Policy on the Environment (1989)

The National Policy on the Environment provides overarching guidance for environmental protection and sustainable development, including environmental impact assessment, water quality standards, pollution control, and public health safeguards.

Relevance to AGROW: Forms the foundational policy basis for EIA/ESMF implementation, pollution prevention, and environmental monitoring of project activities (ESS1, ESS3).

▪ Nigerian Environmental Management Act 1992 (Draft – FEPA Provisions)

Following the merger of FEPA into the Federal Ministry of Environment, the Act assigns the Minister of Environment responsibility for environmental regulation, issuing permits, enforcement, and compliance monitoring for prescribed activities.

Relevance to AGROW: Supports FMEnv oversight, environmental permitting, inspections, and enforcement applicable to AGROW-supported civil works and agro-processing activities (ESS1).

- **Land Use Act, 1978 (as amended)**

The Land Use Act vests land ownership in state governors to be held in trust for the common benefit of Nigerians and provides the legal framework for land acquisition, allocation, and compensation for overriding public interest.

Relevance to AGROW: Guides land access, acquisition, and compensation processes for project infrastructure and ensures alignment with resettlement planning requirements (ESS5).

- **Legal Framework for Water and Sanitation Supply 2000**

Nigeria’s water and sanitation framework includes the Water Resources Decree, River Basin Development Authorities, National Water Resources Institute, State Water Boards, and State Rural Water Supply and Sanitation Agencies (RUWASA).

Relevance to AGROW: Defines institutional roles for water supply, irrigation, and sanitation services relevant to agricultural production and rural development interventions (ESS3)

- **Gender-Based Violence (GBV) Framework**

Nigeria’s legal and policy framework on GBV includes the 1999 Constitution, Violence Against Persons (Prohibition) Act (2015), Child Rights Act (2003), National Gender Policy (revised 2021), Labour Act, and Trafficking in Persons Act. Nigeria is also a signatory to CEDAW and the Maputo Protocol.

Relevance to AGROW: In line with ESS1, ESS2, ESS4, and ESS10, the AGROW Project integrates GBV risk mitigation measures, including a GBV Action Plan, worker codes of conduct, community awareness, and gender-responsive Grievance Mechanisms.

- **NESREA regulations and FMEnv guidelines 2009**

As presented in Table 3.1, NESREA regulations and FMEnv guidelines constitute the primary national regulatory framework governing environmental assessment, pollution prevention, resource efficiency, occupational health and safety, and environmental compliance in Nigeria. These instruments are directly applicable to AGROW-supported agricultural production, agro-processing, irrigation, and associated civil works.

They are broadly consistent with the World Bank Environmental and Social Standards—particularly ESS1 (Assessment and Management of E&S Risks), ESS2 (Labor and Working Conditions), ESS3 (Resource Efficiency and Pollution Prevention), ESS4 (Community Health and Safety), and ESS10 (Stakeholder Engagement). Where gaps exist between national requirements and the World Bank ESS, the AGROW Project will apply the more stringent provisions through the ESMF and ESCP to ensure full compliance with World Bank safeguards requirements.

Table : Legal, Policy and Institutional Framework.4: AGROW Project NESREA–FMEnv–ESS Compliance Matrix

NESREA / FMEnv Instrument	Key Regulatory Focus	Relevance to AGROW Project	Applicable Project Activities	Aligned World Bank ESS	Responsible Institution	PAD / ESMF Compliance Note
NESREA EIA Regulations / FMEnv EIA Guidelines	Environmental screening, impact assessment, mitigation, monitoring	Statutory basis for environmental and social assessment of subprojects	Civil works, agro-processing, irrigation	ESS1, ESS10	FMEnv, NESREA, SEPAs, AGROW PIU	ESS-aligned screening and ESMPs applied; higher standard prevails
NESREA Surface & Groundwater Quality	Protection of water resources	Controls abstraction and wastewater	Irrigation, processing facilities	ESS3, ESS4	NESREA, SEPAs, AGROW PIU	Integrated through ESMP water

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Regulations		discharge				management measures
NESREA Sanitation & Waste Control Regulations	Solid and liquid waste management	Guides waste handling and disposal	Construction and operational waste	ESS3	NESREA, SWMAs, AGROW PIU	Waste plans included in ESMPs
NESREA Air Quality Control Regulations	Air emission limits	Controls dust and emissions	Civil works, generators	ESS3	NESREA, SEPAs, AGROW PIU	Emission controls monitored under ESMPs
NESREA Noise Standards Regulations	Noise emission control	Reduces community and worker exposure	Construction and operations	ESS3, ESS4	NESREA, SEPAs, AGROW PIU	Noise limits enforced through contractor supervision
NESREA Chemicals & Agrochemicals Regulations	Safe handling of pesticides and chemicals	Promotes IPM and chemical safety	Fertilizer and pesticide use	ESS3, ESS4	NESREA, FMARD, AGROW PIU	ESS pesticide requirements applied where stricter
FMEnv Community - Occupational Health & Safety Guidelines	Worker health and safety	Protects workers during project implementation	Construction and processing facilities	ESS2, ESS4	FMEnv, Contractors, AGROW PIU	ESS2 requirements supplement national OHS

3.3 World Bank ESF Standards Relevant to AGROW

Nine of the World Bank ESS are relevant to the AGROW project viz; ESS1, ESS2, ESS3, ESS4, ESS5, ESS6, ESS8, ESS9, ESS10. Required instruments include ESIA/ESMP, ESCP, LMP, SEP, RPF/RAP, PMP/IPM, Traffic and Emergency Plans, GBV Action Plan, Grievance Mechanism, Child Labor prevention plan, Biodiversity Action Plan, Security Management Plans, Environmental and social code of practice, (ESCP) Chance-Find Procedures, and Contractor C-ESMP.

3.3.1 Gap Analysis and Alignment Actions

AGROW must bridge gaps between Nigerian laws and ESF by ensuring EIA meets ESS1 requirements, aligning compensation with ESS5, enforcing ESS2 labour standards, applying ESS3/IPM for pollution control, operationalizing GBV measures under ESS4/ESS10, avoiding critical habitats per ESS6, and institutionalizing SEP and GM. Table 3.2 presents Gap Analysis Matrix (ESS vs Nigeria vs Alignment Actions).

While Nigeria's regulatory framework provides a solid foundation for environmental management, gaps remain in social risk management, stakeholder engagement, labor standards, and resettlement practices. For the AGROW Project, World Bank ESS requirements will apply as the overriding standard, with national laws serving as the minimum baseline. All alignment actions presented in Table 3.2 correspond directly to ESCP commitments, notably:

- Preparation, disclosure, and implementation of **ESMF, SEP, LMP, RAPs, ESMPs**
- Application of **WBG EHS Guidelines**
- Establishment of **functional GMs (community & worker)**
- No commencement of civil works prior to instrument approval

Table : Legal, Policy and Institutional Framework.5: Gap Analysis Matrix (ESS vs Nigeria vs Alignment Actions)

ESS with Key Requirement	National Legal/Policy Instruments	Identified Gaps	AGROW Core Alignment Instruments / Measures	Responsible Institutions
ESS1: Assessment and Management of Environmental and Social Risks and Impacts paras. 6–14; 19–28; 31–36	National Policy on the Environment (1989); Nigerian Environmental Management Act (FEPA provisions); Water Resources Decree No. 101 of 1993	Limited social, cumulative risk coverage	ESMF; Screening Checklists with focus on gap filling measures on social and cumulative risks, ESMPs; Monitoring & Reporting Framework	FMEnv; SEPAs; AGROW PIU
ESS2: Labor and Working Conditions paras. 6–16; 24–30; 31–33	Labour Act (2004); VAPP Act (2015); National Gender Policy (Revised 2021)	No worker GM; weak OHS enforcement, child labor	Labor Management Procedures (LMP); OHS Plan; Worker Code of Conduct; Worker GM, child labor prevention plan	AGROW PIU; Contractors; FMEnv
ESS3: Resource Efficiency and Pollution Prevention and Management paras. 5–12; 13–20	National Water Supply and Sanitation Policy; Water Resources Decree No. 101 of 1993; Water & Sanitation Institutional Framework	Weak climate/resource efficiency integration	ESMPs; Waste Management Plans; Water Use & Abstraction Controls	FMEnv; SEPAs; SWMAs; AGROW PIU
ESS4: Community Health and Safety paras. 6–9; 20–27; 30–34	National Policy on the Environment; VAPP Act (2015); National Water Supply and Sanitation Policy	No formal Community Health and Safety planning	Community Health & Safety Measures included in site specific ESMPs; Traffic & Site Safety Plans; GBV Action Plan; Community GM	AGROW PIU; SEPAs; Local Authorities
ESS5: Land Acquisition, Restrictions on Land Use and involuntary resettlement paras. 6–9; 10–15; 20–23	Land Use Act, 1978 (as amended)	Compensation below replacement cost No compensation for Encroachers, squatters and Illegal structures	Resettlement Policy Framework (RPF); RAPs/ARAPs (as required); Compensation & Livelihood Restoration Measures Non-titled holders/squatters recognized as PAPs and eligible for assistance and payment for assets owned	State Governments; AGROW PIU
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	Natural Resources Conservation Council Act No. 286 of 1990	Weak habitat protection	Environmental Screening; Biodiversity Management Measures in ESMPs	FMEnv; SEPAs; AGROW PIU

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paras. 7–13; 14–18				
ESS7: Indigenous Peoples / SSA Historically Underserved Traditional Local Communities, paras. 8–13	Not relevant		Not relevant to AGROW Project scope	N/A
ESS8: Cultural Heritage, paras. 8–11	National Policy on the Environment (EIA procedures)	Chance finds weak	Chance Find Procedures included in ESMPs	AGROW PIU; Contractors; FMEnv
ESS9: Financial Intermediaries paras. 6–11	Labour Act (2004);	Covers "Workers" (manual labor or clerical work). Often excludes "Administrative" or "Professional" staff.	Fund Manager ESMS to cover all category of workers/personnel	AGROW PIU; Fund Manager
ESS10: Stakeholder Engagement and Information Disclosure paras. 10–16; 26–27	National consultation requirements under EIA laws; GBV legal framework	One-off, non-inclusive	Stakeholder Engagement Plan (SEP); Project GM; Disclosure Protocols	AGROW PIU; FMEnv; State & Local Authorities

Chapter Two : Baseline Environmental and Socio-Economic Characteristics

4.1 Introduction

This chapter synthesizes the baseline environmental and socio-economic context of Nigeria relevant to the AGROW Project. Given the multi-state scope and the absence of finalized subproject locations, the baseline is presented at a national summary level. Detailed, site-specific assessments will be undertaken during subproject Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plans (ESMPs).

4.2 Physical Environment

4.2.1 Geographic and Safeguards Context for AGROW

Nigeria covers an estimated 923,768 km² and is administratively structured into 36 states and the Federal Capital Territory (FCT) across six geopolitical zones, within which the AGROW Project will be implemented in selected participating states. The country's wide range of ecological zones—ranging from semi-arid Sahelian landscapes to humid forests and coastal mangroves—combined with shared borders with Niger, Chad, Cameroon, and Benin, and a southern coastline along the Gulf of Guinea, create diverse environmental sensitivities and transboundary considerations relevant to agricultural development, water resources management, and land use (World Bank, 2023; FMEnv, 2022).

Nigeria's population is estimated at approximately 216 million (2023) and is projected to approach 400 million by 2050, placing increasing pressure on agricultural land, water resources, ecosystems, and rural livelihoods (NBS, 2023; UN DESA, 2022). Rapid rural–urban migration and peri-urban expansion around major cities are intensifying demand for food systems, water supply, waste management, transport infrastructure, and employment, while also increasing exposure to environmental degradation and social risks.

These geographic and demographic dynamics heighten the relevance of robust environmental and social risk management for AGROW interventions, particularly with respect to land acquisition and tenure, water abstraction and irrigation, labor and working conditions, community health and safety, biodiversity protection, and stakeholder engagement.

4.2.2 Climate and Meteorology

Nigeria lies within the tropical climatic zone and its climate is strongly influenced by the seasonal interaction of two dominant air masses: the South-West (SW) monsoon winds, which transport moist maritime air from the Atlantic Ocean and define the rainy season (generally April–October), and the North-East (NE) trade winds, which are dry and dust-laden and dominate the harmattan season (typically November–March). These seasonal dynamics shape agricultural calendars, surface and groundwater availability, and climate-related environmental risks across AGROW participating states (NiMet, 2022; World Bank, 2023).

Four broad climatic zones are commonly recognized in Nigeria:

- **Tropical Wet Zone**, dominant in the southern coastal belt, characterized by high humidity and prolonged rainfall, with implications for flooding, soil erosion, waterlogging, and drainage management in low-lying agricultural areas;
- **Tropical Continental Zone**, covering much of the central region, with clearly defined wet and dry seasons that influence crop productivity, surface water availability, and irrigation demand;
- **Montane Zone**, occurring in high-altitude areas such as the Jos Plateau and eastern highlands, characterized by cooler temperatures and localized rainfall patterns relevant to watershed protection and erosion control; and
- **Semi-Arid Zone**, prevalent in the far northern states, marked by low and variable rainfall, high evapotranspiration, and increased vulnerability to drought, desertification, and water scarcity (FMEnv, 2022; NiMet, 2023).

Temperature

Mean national temperatures generally range between approximately 21°C and 35°C, with extreme highs reaching up to about 44°C in northern regions during the dry season, and lows approaching 6°C during harmattan periods in elevated areas. Elevated temperatures have direct implications for crop stress, water demand, labor health and safety, and post-harvest losses under AGROW-supported agricultural and agro-processing activities (NiMet, 2023).

Rainfall

Annual rainfall shows pronounced spatial variability, ranging from about 500 mm in the semi-arid northern belts to over 2,000 mm in the southern coastal zones. This variability necessitates location-specific approaches to irrigation design, drainage, soil and water conservation, and flood risk management across AGROW intervention areas (World Bank, 2023).

Wind

Mean wind speeds typically range between 2–6 m/s during the dry season, but can increase to approximately 15 m/s during storm events in the rainy season. Strong winds may affect construction safety, the resilience of agro-infrastructure, soil erosion rates, and the dispersion of dust and agrochemicals, requiring appropriate risk management measures (NiMet, 2022).

These climatic conditions underscore the need to integrate climate-smart agriculture, efficient and climate-resilient irrigation, flood and erosion control measures, drought adaptation strategies, and occupational health and safety provisions into AGROW project design and implementation.

4.2.3 Topography and Geology

Nigeria’s topography is predominantly characterized by extensive lowland plains, with about two-thirds of the country lying below 610 meters above sea level. These low-lying areas support the bulk of agricultural production and human settlements but are also prone in some locations to flooding, soil erosion, and poor drainage, particularly along major river systems and coastal zones (FMEnv, 2022; World Bank, 2023).

Prominent highland and plateau areas occur along the eastern border and in central Nigeria, including the Chappal Waddi massif (approximately 2,419 meters) in the northeast and the Jos Plateau in the central region. These elevated zones experience cooler temperatures, localized rainfall patterns, and steeper slopes, which have implications for watershed protection, erosion control, and land-use planning, especially where agricultural expansion or infrastructure development is proposed (Federal Ministry of Environment, 2022).

Geologically, Nigeria consists of two major formations: the Precambrian crystalline basement complex, underlying much of the central and western regions, and extensive sedimentary basins, notably in the Niger Delta, Benue Trough, Chad Basin, and coastal areas. The basement complex is generally associated with shallow and less fertile soils, variable groundwater availability, and localized mineralization, while sedimentary formations typically support deeper soils and more productive aquifers, but may also present risks related to subsidence, salinity intrusion, and erosion, depending on location and land-use intensity (Geological Survey of Nigeria; World Bank, 2023).

Variations in topography and geology influence soil fertility, drainage, groundwater potential, and the stability of agricultural and rural infrastructure. AGROW-supported activities—such as irrigation schemes, agro-processing facilities, storage structures, and rural access roads—must therefore be carefully sited and designed to account for slope stability, erosion potential, flood risk, and foundation conditions.

4.2.4 Air Quality and Noise

Air quality in Nigeria is an increasing environmental and public health concern, particularly in urban, peri-urban, and industrial areas where emissions from road transport, biomass and open waste burning, small-scale agro-processing, and industrial activities are prevalent. In both rural and agricultural communities, the widespread reliance on diesel generators, firewood, and charcoal for energy contributes significantly to elevated concentrations of particulate matter (PM), nitrogen oxides (NO_x), and other air pollutants, with adverse implications for human health (FMEnv, 2022; World Bank, 2023).

Exposure to poor air quality disproportionately affects vulnerable populations, including women, children, the elderly, and informal-sector workers, and is associated with increased risks of respiratory and cardiovascular diseases. These impacts are particularly relevant for AGROW-supported value chain activities involving aggregation, processing, storage, and transport of agricultural produce (World Health Organization; World Bank, 2023).

Noise pollution is also rising due to commercial activities, agro-processing operations, construction works, transportation, markets, and social and household sources. Prolonged exposure to elevated noise levels can lead to hearing impairment, stress, sleep disturbance, and reduced productivity, especially in densely populated or mixed-use areas where AGROW-supported infrastructure and facilities may be located (FMEnv, 2022).

4.2.5 Soil and Agricultural Potential

Nigeria's soils are predominantly highly weathered tropical soils, generally characterized by low to moderate natural fertility, acidic pH, limited organic matter, and spatially variable nutrient availability. These characteristics reflect prolonged weathering and leaching processes typical of the humid and sub-humid tropics, as well as historical land-use practices, and they influence crop productivity, fertilizer requirements, and sustainable land management options (FMEnv, 2022; FAO, 2023). Without appropriate soil conservation and fertility management, agricultural intensification may accelerate soil erosion, nutrient depletion, and land degradation, particularly in areas targeted for expanded production under AGROW.

Despite these constraints, Nigeria's diverse agro-ecological zones present significant comparative advantages for diversified agricultural production that align closely with AGROW's productivity, resilience, and value-chain development objectives.

Humid Forest Zone

This zone is characterized by deep, highly weathered soils that support tree crops such as cocoa, oil palm, and rubber, as well as root and tuber crops including cassava and yam. High rainfall enables year-round production but also increases risks of soil erosion, nutrient leaching, and pest and disease pressure, requiring integrated soil fertility management and erosion control measures (FAO; FMEnv, 2022).

Derived Savanna and Guinea Savanna Zones

These zones are dominated by moderately fertile soils and relatively flat terrain, forming Nigeria's main belts for maize, sorghum, rice, soybean, groundnut, and vegetable production. The landscape is generally favorable for mechanization, irrigation development, and market-oriented agriculture, making these zones central to AGROW's value-chain and aggregation-focused interventions (World Bank, 2023).

Sudan and Sahel Savanna Zones

Soils in these northern zones are typically lighter-textured and more vulnerable to moisture stress, supporting crops such as millet, sorghum, cotton, sesame, and tomato, often under irrigation, alongside extensive livestock grazing. Sustainable water management, soil moisture conservation, and rangeland management are critical to maintaining productivity and resilience in these areas (FAO; NiMet, 2023).

Coastal and Mangrove Zones

Coastal areas are characterized by alluvial and hydromorphic soils that are suitable for rice, sugarcane, vegetables, aquaculture, and fisheries. However, these zones are also highly sensitive to flooding, salinity intrusion, and acid sulfate soils, necessitating careful water control and land-use planning (FMEnv, 2022).

The diversity of soil types and agricultural potential across Nigeria underscores the need for location-specific agronomic practices, soil fertility improvement, and sustainable land management under AGROW.

4.2.6 Hydrology

Nigeria's hydrology is dominated by two major river systems—the Niger River and the Benue River—which converge at Lokoja before flowing southwards into the Niger Delta and the Atlantic Ocean. Together with an extensive network of perennial and seasonal tributaries across both northern and southern regions, these rivers

constitute the backbone of Nigeria’s surface water resources and are central to agriculture, fisheries, domestic water supply, hydropower, and ecosystem services (FMWR, 2022; World Bank, 2023).

Across the country, river floodplains, inland valleys, wetlands, and fadama areas provide fertile alluvial soils and support irrigation development, aquaculture, and dry-season farming, particularly in the savanna and semi-arid zones where rainfall is limited or highly seasonal. These hydrological features underpin high agricultural productivity and integrated crop–livestock–fish systems that are directly relevant to AGROW’s value-chain and resilience objectives (FAO; FMWR, 2022).

At the same time, Nigeria’s river systems are subject to seasonal and increasingly severe flooding, which has intensified in recent years due to climate variability, land-use change, population growth, and upstream water regulation. Flooding poses risks to agricultural land, storage and processing facilities, rural roads, and communities, while unregulated water abstraction, poor drainage, and encroachment into wetlands can degrade aquatic habitats and downstream ecosystems (FMEnv, 2022; World Bank, 2023).

AGROW-supported interventions—such as irrigation schemes, water harvesting structures, agro-processing facilities, and rural infrastructure—are closely linked to both surface and groundwater resources. Accordingly, the AGROW ESMF requires site-specific screening and assessment of hydrological risks, including flood exposure, water abstraction and allocation, drainage management, and downstream impacts.

4.2 Biological Environment

4.2.1 Biodiversity

Nigeria hosts high levels of biodiversity, reflecting a wide range of ecological zones that extend from the Sahelian and Sudan savannas in the north, through the Guinea savanna and lowland rainforest belts, to freshwater wetlands and coastal mangrove ecosystems in the south. This ecological diversity underpins essential ecosystem services—including soil fertility, pollination, water regulation, fisheries, and forest-based livelihoods—that are closely linked to agricultural productivity and rural welfare in AGROW participating states (FMEnv, 2022; World Bank, 2023).

Several Key Biodiversity Areas (KBAs) and protected ecosystems overlap with habitats of globally and nationally threatened species, particularly in forested, riverine, and coastal zones. Notable species include the Cross River Gorilla, Nigeria–Cameroon Chimpanzee, African forest elephant, and West African manatee. Nigeria’s protected area network—comprising sites such as Yankari Game Reserve, Gashaka-Gumti National Park, Cross River National Park, and Omo Forest Reserve—serves as critical biodiversity refuges but faces increasing pressure from agricultural expansion, logging, settlement growth, and infrastructure development (IUCN; FMEnv, 2022).

Nigeria’s floral diversity is estimated at approximately 4,700–4,800 species of higher plants, with over 100 species classified as threatened, largely due to habitat loss, land degradation, and overexploitation. Faunal diversity is similarly high but increasingly vulnerable, particularly in forest and wetland ecosystems that overlap with agricultural landscapes and development corridors relevant to AGROW interventions (IUCN; World Bank, 2023).

4.2.2 Ecosystem Services in Nigeria’s Biological Environment

Nigeria’s ecosystems provide critical services that sustain agriculture and rural livelihoods. Fertile soils support crop production, but they are increasingly threatened by erosion and nutrient depletion, requiring integrated soil fertility management and climate-smart practices. Pollination by bees, birds, and other species underpins the productivity of fruits, vegetables, and oilseeds, yet pollinator populations are declining due to habitat loss and pesticide misuse. Wetlands and river systems regulate water flow, recharge aquifers, and mitigate floods, while also enabling irrigation and aquaculture. These natural processes are essential for maintaining agricultural resilience and food security.

Forests and aquatic ecosystems contribute significantly to rural economies through timber, fuelwood, non-timber forest products, and fisheries. Inland rivers and coastal waters provide fish for nutrition and income, but overfishing and pollution threaten these resources. Forest-based livelihoods are under pressure from deforestation and land conversion, reducing biodiversity and carbon sequestration. Protecting these

ecosystem services is vital for AGROW's objectives, requiring measures such as sustainable land management, integrated water resources management, agroforestry, and conservation of pollinator habitats to ensure long-term productivity and climate resilience.

4.3 Climate Risk

Nigeria is increasingly exposed to the impacts of climate change, including rising temperatures, shifting rainfall patterns, and more frequent and intense extreme weather events. These trends pose significant risks to agricultural productivity, rural livelihoods, infrastructure, water resources, and public health, with direct implications for the design, siting, and long-term sustainability of AGROW-supported investments across diverse agro-ecological zones (World Bank, 2023; NiMet, 2022).

Flooding and Sea Level Rise

Seasonal and increasingly severe flooding affects large parts of Nigeria, particularly riverine floodplains, low-lying inland areas, and coastal zones. Recurrent floods damage cropland, rural roads, storage and processing facilities, and irrigation infrastructure, disrupt market access, and increase exposure to waterborne diseases. In the coastal belt, sea level rise and coastal subsidence intensify erosion and saline intrusion, reducing land productivity and threatening livelihoods dependent on agriculture and fisheries (FMEnv, 2022; World Bank, 2023).

Desertification and Land Degradation

In northern Nigeria, desertification continues to advance southwards, driven by declining rainfall, rising temperatures, deforestation, and unsustainable land-use practices. This process reduces the availability of arable land and pasture, undermines agricultural productivity, and heightens competition over land and water resources, with potential social and conflict-related implications for AGROW-supported activities (Federal Ministry of Environment, 2022).

Drought and Temperature Rise

Increasing frequency of prolonged dry spells and higher average temperatures raises evapotranspiration rates, stresses crops and livestock, and constrains surface and groundwater availability. These conditions affect planting calendars, yields, post-harvest handling, and labor productivity, while also increasing occupational health and safety risks for agricultural workers during periods of extreme heat (NiMet, 2023).

4.4 Socio-Economic

4.4.1 Demographics and Land Use

Nigeria's social environment is shaped by high levels of ethnic, cultural, and religious diversity, with more than 250 ethnic groups and multiple languages and belief systems distributed across the country. These social and cultural systems influence community governance, land relations, livelihood strategies, and decision-making structures, and they vary significantly across Nigeria's agro-ecological and geopolitical zones (National Bureau of Statistics; World Bank, 2023). Such diversity has important implications for stakeholder engagement, social inclusion, and conflict sensitivity in AGROW-supported activities.

Land use in Nigeria is predominantly agricultural, with approximately 70–80 percent of total land area under farming, grazing, and related rural uses. Land tenure is governed by the Land Use Act of 1978, which vests land ownership in state governors for the benefit of the people. In practice, however, customary tenure systems remain dominant in rural areas, determining land allocation, inheritance, and dispute resolution. This coexistence of statutory and customary systems affects land access, compensation, and resettlement, and is particularly relevant for AGROW investments involving land development, irrigation, agro-processing facilities, and rural infrastructure (FMEnv; World Bank, 2017).

4.4.2 Livelihoods

Rural livelihoods are centered primarily on smallholder crop production and livestock rearing, supplemented by agro-processing, petty trading, transport services, fishing, and seasonal wage labor. These livelihood systems are highly dependent on secure land access, water availability, market connectivity, and climatic

conditions, making rural populations particularly vulnerable to environmental and economic shocks (NBS; World Bank, 2023). AGROW interventions therefore need to be designed to enhance resilience, productivity, and income diversification while minimizing risks to existing livelihood systems.

4.4.3 Education, Skills, and Human Capital

Literacy levels and technical skills are generally lower in rural areas, limiting the adoption of improved technologies, climate-smart agriculture, and effective environmental and social management practices (UNESCO, 2021; World Bank, 2022). Capacity gaps also affect compliance with occupational health and safety, environmental protection, and social safeguards. Consequently, training, extension services, and institutional capacity building form an integral part of AGROW and are embedded in the ESMF to support effective mitigation, monitoring, and sustainable operation of project-supported infrastructure.

4.4.4 Poverty and Vulnerability

An estimated 40 percent of Nigeria’s population lives below the national poverty line, with poverty incidence significantly higher in rural and agriculturally dependent communities (NBS, 2022; World Bank, 2023). Limited access to infrastructure, finance, extension services, and markets constrains income generation and reinforces subsistence-level production. By improving productive infrastructure and market linkages, AGROW seeks to raise incomes, enhance food security, and support inclusive rural growth, particularly for smallholders and vulnerable households.

4.4.5 Infrastructure and Economy

Agriculture is a core pillar of Nigeria’s economy, contributing approximately 24 percent of Gross Domestic Product (GDP) and providing employment for the majority of the labor force, particularly in rural areas where poverty and vulnerability are most pronounced (National Bureau of Statistics – NBS, 2023; World Bank, 2023). The sector underpins food security, rural livelihoods, and non-oil economic diversification, making it central to Nigeria’s development agenda and to the objectives of the AGROW Project.

Despite its importance, agricultural performance is constrained by significant infrastructure deficits, including poor rural and feeder road networks, unreliable electricity supply, limited irrigation coverage, inadequate storage and cold-chain facilities, and weak market and logistics infrastructure. These gaps raise production and transaction costs, reduce private-sector participation, limit value addition, and undermine the competitiveness of agricultural value chains targeted under AGROW (Federal Ministry of Agriculture and Food Security – FMAFS, 2021; World Bank, 2023).

Post-harvest losses remain substantial across staple, horticultural, and perishable crops, driven by inadequate storage, poor handling practices, insufficient processing capacity, and weak market integration (FAO, 2021; World Bank, 2020). Low levels of mechanization, limited access to quality seeds, fertilizers, and agrochemicals, and insecurity in parts of the country further constrain productivity, disrupt supply chains, and deter private investment in agricultural infrastructure and agribusiness (African Development Bank – AfDB, 2022).

To address these constraints, Nigeria is implementing and planning major transport and logistics corridor investments, including road rehabilitation and expansion, aimed at improving rural–urban connectivity, reducing travel time, and enhancing market access for agricultural producers (Federal Ministry of Works, 2022; World Bank, 2023). AGROW-supported investments in aggregation and storage centers, agro-processing facilities, and irrigation schemes are aligned with these national priorities and are expected to improve market integration, reduce losses, and strengthen value chains. However, such infrastructure development may also generate localized environmental and social risks, including land acquisition, labor influx, waste generation, and community health and safety concerns, which require systematic management under the ESMF.

4.5 Vulnerable Groups

4.5.1 Gender and Social Inclusion

Women play a central role in agricultural production, processing, and marketing, yet they face persistent constraints in land ownership, access to credit, inputs, extension services, and participation in decision-making. These inequalities affect how project benefits and risks are distributed. In response, AGROW incorporates gender-responsive and socially inclusive measures, including targeted support, capacity building, and participatory engagement, consistent with ESS2 (Labor and Working Conditions), ESS5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement), and ESS10 (Stakeholder Engagement and Information Disclosure).

4.5.2 Youth and Persons with Disabilities

Youth and persons with disabilities in Nigeria face persistent structural barriers that limit their economic opportunities and participation in decision-making. These challenges include restricted access to productive resources such as land, credit, and agricultural inputs, as well as limited inclusion in extension services and vocational training programs. Social norms, inadequate policy enforcement, and weak institutional support further exacerbate these constraints, leaving these groups marginalized in agricultural value chains and rural development initiatives.

For AGROW, addressing these barriers is critical to achieving inclusive growth and equitable benefit sharing. The project integrates targeted measures such as skills development, tailored financial products, and participatory engagement platforms to ensure youth and persons with disabilities can access resources, voice concerns, and contribute to project outcomes. These interventions align with ESS2 (Labor and Working Conditions), ESS5 (Land Acquisition and Involuntary Resettlement), and ESS10 (Stakeholder Engagement), promoting social inclusion and reducing vulnerability in project-supported communities.

4.5.3 Conflict Sensitivity

Competition over land, water, and grazing resources, particularly between pastoralists and sedentary farmers, has intensified in parts of Nigeria due to population growth, climate variability, environmental degradation, and migration. These pressures have increased the risk of localized conflict and insecurity in several rural areas where AGROW investments may be implemented (World Bank; FMEnv). The ESMF therefore integrates conflict-sensitive screening, community dialogue, and Grievance Mechanisms to help prevent, manage, and resolve disputes. These social conditions require strong stakeholder engagement, transparent land and compensation processes, gender-responsive project design, and conflict-sensitive implementation to ensure that project benefits are equitably shared, social risks are minimized, and affected communities are meaningfully engaged throughout the project cycle.

4.5.4 Security and Conflicts

Over the past 25 years, Nigeria has witnessed the sequential emergence of distinct forms of insecurity in the different sub-regions of the country, accompanied by the emergence of various non-state armed groups (NSAGs) that challenge the nation's security forces and local communities. These NSAGs range from ideological insurgents and militants (e.g., Boko Haram/ISWAP, neo-Biafran separatists) to ethnic militias and organized crime groups (OCGs) such as bandits and cults. While the intensity of insecurity in any given region may ebb and flow over time, many of the structural drivers of violence such as poverty, intercommunal tensions, and political exclusion remain challenges for Nigeria. Moreover, NSAGs may strategically remobilize in pursuit of specific interests, creating a fluid and complex national security environment that can be characterized as different manifestations of insecurity driven by common causes (CDD, 2022). AGROW will leverage and strengthen stakeholder engagement process at all stages of project implementation with the availability of an effective grievance mechanisms and increased transparency to provide information and communication avenues for complaints and their resolutions. The Security Management Plans to be developed will assess the risks and threats to project implementation and include an action plan for managing security risks to the project and the people.

Chapter 4 : Environmental and Social Risks, and Impacts

This chapter identifies, evaluates, and manages the environmental and social (E&S) risks and impacts of the AGROW Project in alignment with the World Bank Environmental and Social Framework (ESS1–ESS10). Given Nigeria’s complex land tenure systems, fragile rural security landscape, and high social vulnerability, the AGROW risk management strategy is explicitly **conflict-sensitive and security-aware**. The analytical findings presented here serve as the foundation for the mitigation framework detailed in **Chapter 6**. This assessment adopts the **ESS1 risk-based approach** and applies to all project components, including:

- Subprojects and public investments.
- Contractors and participating agribusinesses.
- All associated value chains and geographic intervention areas.

5.1 Risk Identification Approach

AGROW uses a risk-based, activity-specific assessment approach consistent with ESS1. Risks were identified through:

- Review of AGROW components and investments
- Baseline environmental and social conditions
- Stakeholder consultations
- Experience from similar World Bank agricultural projects in Nigeria

Risks are assessed based on the impact assessment methodology presented in Table 5.1.

Table : Environmental and Social Risks, and Impacts.6: Impact Assessment Methodology

Dimension	Description
Likelihood	Probability of occurrence
Severity	Magnitude, reversibility, and spatial extent
Sensitivity	Presence of vulnerable populations, conflict, biodiversity
Duration	Temporary, medium, or long-term
Security context	Presence of conflict, banditry, land disputes, armed actors

Subprojects shall be screened and categorized (Low, Moderate, Substantial, High) using the ESMF screening tool before approval.

5.2 Positive Environmental and Social Impacts

AGROW is expected to deliver significant positive impacts, including improved agricultural productivity, increased farmer incomes, job creation, strengthened value chains, enhanced food and nutrition security, and improved climate resilience. The project promotes climate-smart agriculture, improved resource use efficiency, and sustainable land management practices.

5.2.1 Potential Beneficial Environmental Impacts

The project is expected to generate significant positive environmental outcomes through the following interventions:

1. Regulatory Oversight & Soil Health

- **Quality Input Assurance:** Operationalizing the **Seed Act** and **Fertilizer Control Act** ensures access to verified inputs, safeguarding soil biology and preventing chemical contamination from substandard products.
- **Fertilizer Monitoring:** Strengthened surveillance systems minimize the circulation of adulterated fertilizers, directly reducing nutrient runoff and the eutrophication of local water bodies.

2. Resource Efficiency & Climate Resilience

- **Water Conservation:** The rehabilitation of tertiary canals and irrigation infrastructure promotes precision water use, alleviating pressure on natural aquifers and surface water sources.
- **Climate-Smart Agriculture (CSA):** Adopting CSA practices enhance carbon sequestration in soils and improves the adaptive capacity of farming systems to climate variability.
- **Waste Reduction:** Modern storage and processing facilities significantly lower **post-harvest losses**, reducing the environmental footprint and greenhouse gas emissions associated with wasted organic matter.

3. Sustainable Land Management

- **Enhanced Productivity:** Improved seed varieties and balanced fertilization boost yields per hectare, reducing the "agricultural footprint" and the need for unsustainable land clearing or deforestation.
- **Secure Tenure:** Formalized land arrangements provide the security necessary for farmers to invest in long-term soil conservation, such as terracing, agroforestry, and permanent cover crops.

4. Ecosystem Service Enhancement

- **Restoration of Services:** Collectively, these interventions restore degraded lands and improve ecosystem functions, including natural water regulation, sustained soil productivity, and the protection of local biodiversity.

5.2.2 Potential beneficial social impacts

The AGROW Project is designed to trigger transformative social changes through the following pathways:

1. Economic Empowerment & Poverty Reduction

- **Job Creation:** Construction and operation of irrigation schemes, warehouses, and processing hubs will generate substantial direct and indirect employment for host communities.
- **Income Stability:** Increased yields and direct market linkages through aggregators will elevate household incomes and stabilize rural livelihoods.
- **Inclusive Growth:** Targeted support for women and youth will actively narrow inequality gaps and provide a pathway out of poverty for marginalized smallholders.

2. Food Security and Community Health

- **Nutrition Security:** Enhanced availability of quality inputs leads to increased crop diversity and food production, improving nutritional outcomes at the household level.
- **Safe Farming Environment:** Regulated fertilizer use and improved irrigation management ensure safer water supplies and a healthier environment for farming families.
- **Child Protection:** Strict enforcement of child protection standards will mitigate the risks of child labor while promoting dignified employment for adults.

3. Gender Equality and Youth Inclusion

- **Gender Mainstreaming:** Dedicated access to resources, extension services, and premium markets will empower women farmers and processors, strengthening their role in the value chain.
- **Youth Innovation:** The project creates a modern agribusiness ecosystem that attracts youth, fostering innovation and providing alternatives to rural-urban migration.

4. Institutional Strengthening and Governance

- **Capacity Building:** Training programs for extension workers, cooperatives, and regulators will institutionalize technical knowledge and best practices.
- **Resource Governance:** Policy reforms in land tenure and input regulation will enhance transparency, accountability, and equitable access to agricultural resources.

5. Resilience & Social Cohesion

- **Climate Adaptation:** Climate-smart technologies and reliable irrigation shield communities from shocks like droughts and floods, reducing climate-induced migration or conflict.
- **Collective Action:** Strengthening farmer cooperatives foster social cohesion and build stronger, fairer partnerships between smallholders and large-scale agribusinesses.

5.3 Component-Specific Risks

5.3.1 Component 1 – De-Risking Private Sector Investments in Aggregation & Off-take (ADMLF)

Component 1 finances physical agribusiness infrastructure, logistics, and market systems and therefore carries the highest environmental, land, labor, and security risk profile of AGROW.

A. Financial Intermediary Risk

In the AGROW Project, the use of Financial Intermediaries (FIs) under **Component 1** introduces a unique set of risks. Unlike direct civil works, the primary risk here is **indirect**: the Fund Manager might fund agribusinesses that violate environmental or social standards, creating a "reputational and compliance bridge" back to the Project and the World Bank. Aligned with ESS9, the risks are categorized into Institutional, Portfolio, and Operational risks as outlined below:

1. Institutional & Capacity Risks

These risks relate to the Fund Manager's internal ability to manage the Environmental and Social Management System (ESMS).

- **Weak Governance:** The Investment Committee (IC) may prioritize financial returns over E&S compliance, leading to the approval of "High Risk" projects without proper mitigation.
- **Inadequate Staffing:** Recruitment of traditional credit officers who lack the training to identify "hidden" E&S risks (e.g., child labor in supply chains or land title disputes).
- **Procedural Gaps:** Failure to integrate E&S checks into the actual loan software/workflow, making safeguards an "afterthought" rather than a prerequisite for disbursement.

2. Portfolio and Sub-project Risks

These are risks inherent in the agribusinesses being funded (the Grantees/Borrowers).

- **Pesticide Mismanagement (ESS3):** Aggregators providing unapproved, toxic chemicals to smallholder farmers to boost yields, leading to soil/water contamination.
- **Labor Exploitation (ESS2):** Use of seasonal/casual labor by offtakers without contracts, PPE, or adherence to minimum age requirements (Child Labor).
- **Land Tenure Conflict (ESS5):** Funding the expansion of processing units on land acquired through coercion or without clear "willing-buyer/willing-seller" documentation.
- **SEA/SH Risks (ESS4):** The influx of transport workers and contractors into rural communities for logistics/construction, increasing the risk of Sexual Exploitation and Abuse.

3. Security & Contextual Risks

Since the Fund Manager operates across various states, the security environment is a major variable.

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- **Site Inaccessibility:** Security threats (banditry/insurgency) preventing the Fund Manager from conducting mandatory physical monitoring visits to verify E&S compliance.
- **Asset Vandalism:** Destruction of funded infrastructure (cold hubs, warehouses) due to localized conflict, leading to financial loss and potential environmental hazards (e.g., refrigerant leaks).

B. Red Flags for Fund Managers

Analysts should flag the following as **High Risk** during appraisal:

1. **Borrowers** with no history of safety records or worker insurance.
2. **Agribusinesses** located near "Protected Areas" or "Forest Reserves."
3. **Companies** that refuse to sign the **SEA/SH Code of Conduct**.

C. Risk Classification of Eligible Investments

Funded activities carry varying risk profiles. The Fund Manager must categorize them during the appraisal as presented in Table 5.2.

Table : Environmental and Social Risks, and Impacts.7: Risk Classification of Eligible Investments

Activity Category	Illustrative Risk / Impact	Risk Level
Farmer Engagement	Social exclusion of women/youth; data privacy in digital tools.	Low / Moderate
Aggregation & Logistics	Land acquisition for centers; traffic/safety during transport.	Substantial
Cold Chain / Storage	Refrigerant gas management; energy consumption; waste.	Moderate
Primary Processing	Effluent/wastewater discharge; noise; OHS (moving parts).	Substantial
Small Processing Units	Occupational Health and Safety; fire risks; food safety.	Substantial

D. Component 1 Principal Environmental and Social Risks

Table 5.3 present potential principal environmental and social risks associated with component 1 which includes:

- Land acquisition and access restrictions for aggregation/processing sites (possible economic displacement).
- Construction impacts: dust, noise, waste, traffic safety; chance finds of cultural heritage.
- Resource efficiency and pollution: energy use; wastewater; solid waste (husks, peels, plastics); air emissions from dryers.
- Food safety and community health & safety around truck movements.
- Labor & OHS hazards (machinery; confined spaces; ergonomics).
- GBV/SEA-SH risks linked to value chain expansion and hiring.
- Inclusion risks: elite capture of grants; barriers to women, youth, vulnerable groups.
- Biodiversity/land use concerns if sites are near sensitive habitats.

Table : Environmental and Social Risks, and Impacts.8: Component1: Principal Environmental and Social Risks

Risk	Description
A. Land, Displacement & Conflict (ESS5, ESS4)	
Loss of land or livelihoods	Aggregation centers, warehouses and processing plants require land that may be used by farmers, tenants, or pastoralists.
Land disputes	Competing claims over host sites may trigger conflict.
Elite capture	Local elites may control siting or compensation.

Gender exclusion	Women often lack formal land rights.
Security risk	Physical assets attract theft and armed groups.
B. Construction & OHS (ESS2, ESS4)	
Worker injury	Machinery, civil works, lifting equipment, forklifts.
Community accidents	Increased truck traffic, yard congestion.
Child labor	Risk in cooperatives and informal work.
Gender Based Violence	From Labor influx
Dust, noise, waste	From construction and site operations.
C. Environmental Pollution (ESS3)	
Wastewater	From cassava, rice, oilseed processing.
Solid waste	Husk, chaff, spoiled grain, packaging.
Aflatoxin	Health risk if not properly controlled.
Refrigerants	Cold rooms may use harmful gases.
D. Social Inclusion & Market Power (ESS10)	
Exclusion of smallholders	Off-takers may favor large suppliers.
Grievance Mechanism	Lack of access/resolution of issues to GM for small holder farmers
Women/youth marginalization	Contract terms may disadvantage them.
Price manipulation	Farmers may lack bargaining power.

5.3.2 Component 2 – Public Investments for Modernization

This component introduces technologies, inputs, data systems and extensions, creating biosafety data, labor and chemical risks. Table 5.4 present the potential principal environmental and social risks associated with component 2 as outlined below:

Sub Component 2.1: Research & Extension

- Agrochemical use (fertilizers, pesticides) with potential soil/water contamination and worker exposure.
- Land use changes from demonstration plots; potential natural habitat conversion if poorly sited.
- Labor & OHS in field operations (heat stress; manual handling injuries).
- Community conflicts over trial plots; equity in access to improved technologies.
- GBV/SEA-SH risks during training and field schools.

Sub Component 2.2: Digital Agriculture

- Data privacy and cybersecurity risks (PII of farmers; consent; misuse).
- Digital inclusion risks (exclusion of women, poorer farmers, persons with disabilities; language barriers).
- Labor and OHS for enumerators (travel safety; SEA-SH risks during fieldwork).
- Community tensions over registry eligibility and benefits.
- Environmental footprint of ICT hardware (e-waste).

Table : Environmental and Social Risks, and Impacts.9 : Component 2: Principal Environmental and Social Risks

Risk	Description
Sub-Component 2.1 – Research, Extension & Technology Transfer	
Pesticide exposure	Field trials and demonstrations.
Soil & water pollution	Fertilizer and pesticide misuse.
Farmer injuries	Machinery and equipment.

Exclusion of women	Extension services may reach men only.
Sub-Component 2.2 – Digital Agriculture Ecosystem	
Data misuse	Farmer and land data exposed.
Digital exclusion	Women, youth, remote farmers left out.
Enumerator safety	Field staff exposed to theft or violence.
Inaccurate data	From Cyber attacks
Conflict over eligibility	Registry disputes.
Environmental footprint of ICT hardware (e-waste)	Electronic waste

5.3.3 Component 3 – Policy & Enabling Environment for Inputs Markets and Land Tenure

Component 3 supports reforms and systems that will shape how seeds, fertilizers, and land rights are governed nationwide. These reforms have high leverage but also high social, governance and conflict sensitivity, particularly in Nigeria’s fragile rural context.

Component 3 Principal Environmental and Social Risks

Table 5.5 present the potential principal environmental and social risks associated with component 3 as outlined below:

- Minor civil works in labs: construction nuisances; hazardous lab wastes.
- Regulatory changes affecting market actors; risk of elite capture or exclusion of small firms.
- Land tenure formalization: intra-community disputes, gender bias, or conflict with customary rights.
- SEA-SH/GBV risks during titling interactions and field verification.
- Labor & OHS in labs (chemical/biological hazards).

Table : Environmental and Social Risks, and Impacts.10: Component 3: Principal Environmental and Social Risks

Risk	Description
A: Land Tenure & Certification (ESS5, ESS4, ESS10)	
Land conflict escalation	Formalization of land rights may trigger disputes between customary owners, tenants, pastoralists, and elites.
Elite capture	Local elites may influence land titling to capture land intended for smallholders, women, and youth.
Exclusion of women and youth	Customary norms may block women or youth from receiving certificates.
Displacement risk	Clarification of ownership may result in eviction or loss of access.
Security risk	Land adjudication can trigger violence in contested areas.
B. Seed System (EGS, NASC, SEEDCODEX)	
Exclusion of small seed producers	Licensing and compliance costs may favor large firms.
Counterfeit market displacement	Crackdowns may cause livelihood losses for informal traders.
Data misuse/Cyber attacks	Digital traceability (SEEDCODEX) contains sensitive business and farmer data.
Corruption	Licensing and inspections may be manipulated.
C. Fertilizer Quality Regulation (FISS)	
Market disruption	Enforcement may disrupt supply chains and small dealers.
Livelihood impacts	Informal fertilizer traders may be pushed out.
Chemical handling risk	Reference labs may expose workers and communities to hazardous substances.
Fraud & bribery	Inspection and labeling systems may be abused.

5.3.4 Component 4 – Project Coordination, Monitoring & Evaluation

Component 4 manages AGROW’s ESF system and therefore carries governance, integrity, GBV, and reputational risk if weakly implemented.

Component 4 Principal Environmental and Social Risks

Table 5.6 present the potential principal environmental and social risks associated with component 4 while Table 5.7 present the summary of key environmental and social risks and mitigation measures as outlined below:

- Coordination gaps leading to unmanaged cumulative impacts.
- Weak GM or slow resolution eroding trust.
- Data and evaluation ethics in surveys.
- SEA-SH case mis-handling if staff are not trained.

Table : Environmental and Social Risks, and Impacts.11: Component 4: Principal Environmental and Social Risks

Risk	Description
ESF failure	Weak staffing leads to non-compliance and Bank sanctions.
GM breakdown	Complaints (especially SEA-SH) ignored or mishandled.
Data and privacy risk	Beneficiary and GBV data misused.
Retaliation	Complainants or whistle-blowers face intimidation.
Cumulative impacts	Lack of coordination with roads, power, irrigation projects.
Security failures	Incidents not reported or managed.

Table : Environmental and Social Risks, and Impacts.12: Summary of Key Environmental and Social Risks and Mitigation Measures

Project Activity	Key Risks & Impacts	Applicable ESS	Mitigation Measures	Instrument
Aggregation & storage facilities	Land acquisition, OHS risks, waste generation, traffic safety, grievances	ESS1, ESS2, ESS3, ESS4, ESS5,ESS10	Screening; site-specific ESMP; OHS plans; waste management; traffic management	ESMP / ESIA / RAP/SEP
Agro-processing equipment	Pollution, worker safety, energy & water use	ESS1, ESS2, ESS3, ESS4	Cleaner production; OHS procedures; EHS Guidelines	ESMP
Irrigation rehabilitation	Water abstraction, soil salinization, downstream impacts	ESS1, ESS3, ESS4	Water management plans; efficient irrigation	ESMP/WMP
Extension & field activities	Worker safety, exclusion risks	ESS2, ESS10	OHS guidance; inclusive outreach	ESMP/SEP
Digital systems	Data privacy, exclusion of vulnerable groups	ESS1, ESS10	Data protection protocols; inclusive design	ESMP/SEP
Land acquisition	Physical & economic displacement	ESS5	Compensation & livelihood restoration	RAP/SEP
Labor influx	SEA/SH, community tension	ESS2, ESS4	SEA/SH Action Plan; codes of conduct	ESMPLMP-
Biodiversity-sensitive areas	Habitat disturbance	ESS6	Screening; exclusion of critical habitats	ESIA / ESMP
Cultural heritage	Chance finds	ESS8	Chance find procedures	ESMP

5.4 Cross-cutting Environmental and Social Risk Themes

5.4.1 Land Acquisition and Involuntary Resettlement

AGROW subprojects under Component 1 (aggregation centers, storage facilities) and Component 3 (land tenure reforms) may require land acquisition or impose restrictions on land use. These activities could lead to physical or economic displacement, affecting smallholder farmers, women, and vulnerable groups.

Management Approach:

- Comply with ESS5 and the Resettlement Policy Framework (RPF).
- Prepare Resettlement Action Plans (RAPs) where displacement occurs.
- Ensure fair compensation, livelihood restoration, and voluntary agreements where feasible.
- Integrate gender-sensitive protocols to secure women's land rights and prevent elite capture.
- Establish community mediation mechanisms to resolve disputes.

5.4.2 Labor and Working Conditions

AGROW will engage direct workers (PIU staff), contracted workers (construction, ICT), and community workers (extension agents). Risks include OHS hazards, child labor, and lack of grievance channels.

Management Approach:

- Align with ESS2 and implement Labor Management Procedures (LMP).
- Enforce OHS standards: PPE, training, emergency response plans.
- Prohibit child and forced labor through contractual clauses.
- Operationalize a workers' GM for complaints and incident reporting.
- Conduct periodic audits and capacity building for contractors.

5.4.3 Gender-Based Violence (GBV) and SEA/SH

Labor influx during construction and field activities (training, enumeration) may increase risks of GBV and SEA/SH.

Management Approach:

- Develop and enforce a SEA/SH Action Plan.
- Require Codes of Conduct for all workers and contractors.
- Provide awareness training for staff and communities.
- Establish confidential GM channels and survivor-centered referral pathways.
- Partner with local service providers for psychosocial and legal support.

5.4.4 Community Health and Safety

Risks include traffic accidents, construction hazards, and disease transmission during community engagement.

Management Approach:

- Implement traffic management plans (signage, speed limits, routing).
- Apply site safety measures: fencing, signage, restricted access.
- Conduct community awareness campaigns on safety and hygiene.
- Integrate emergency preparedness plans for accidents and outbreaks.

5.4.5 Biodiversity and Natural Habitats

AGROW will not finance activities causing significant conversion of critical habitats. However, risks may arise from site selection for aggregation centers or demo plots.

Management Approach:

- Screen all sites using biodiversity exclusion criteria.
- Avoid critical habitats and apply offsets if unavoidable impacts occur.
- Implement site-specific ESMPs with habitat protection measures.
- Monitor compliance with ESS6 and national biodiversity regulations.

5.4.6 AGROW Project Core Security Risks

The project operates in an environment where the following risks are prevalent:

- **Insurgency & Banditry:** Threats to project sites, especially in remote agricultural corridors, leading to potential kidnapping or site sabotage.
- **Farmer-Herder Conflicts:** Violence arising from land use disputes or damage to crops/livestock during infrastructure construction (e.g., irrigation canals).
- **Theft & Vandalism:** Theft of high-value assets like solar panels, irrigation pumps, or processed grain from aggregation centers.
- **Social Unrest:** Protests or blockades by community members if labor recruitment is perceived as unfair or if compensation is delayed.

Table 5.8 presents cross-cutting environmental and social risk matrix.

Table : Environmental and Social Risks, and Impacts.13: Cross-cutting Environmental and Social Risk Matrix

Risk Category	Likely Components (C)	Inherent Risk	Key Controls/Mitigation	Residual Risk
Land acquisition/ economic displacement/ disputes	C1(sites), C3 (land reforms)	High	RPF/RAPs; voluntary agreements; livelihood restoration; stakeholder mediation	Moderate
Construction nuisances & traffic	C1, C3 (labs)	Medium	ESMPs; contractor C-ESMP; traffic management; community engagement	Low– Moderate
Pollution/waste (effluent, solid, air, pesticides)	C1, C2.1, C3 (labs)	High	Wastewater pre-treatment; dust controls; biomass reuse; hazardous waste plans	Moderate
Agrochemical/soil & water contamination	C2.1, C3	Medium	IPMP; training; PPE; storage; water monitoring	Low– Moderate
Labor & OHS: Child labor, unsafe conditions	All	High	LMP; OHS plans; training; PPE; incident reporting; audits	Moderate
Community health & safety, Traffic, insecurity	C1, C2.1, C2.2	Medium	Traffic & emergency plans; food safety SOPs; safe events, SMP	Moderate - High
GBV/SEA-SH	All (esp. C1, C2.2)	High	SEA-SH Action Plan; Codes of Conduct; dedicated GM pathways; service provider MOUs	Moderate
Social Exclusion: Exclusion of women, youth	C2, C3	Medium	stakeholder mediation	Low- Moderate

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Data privacy & cybersecurity	C2.2, C4	High	DPIA; governance; consent; access controls; breach response	Moderate
Biodiversity/ habitat loss, deforestation	C1, C2.1	Medium	Site screening; exclusion zones; offsets if needed	Low–Moderate
Cultural heritage (chance finds) Damage to sites	C1	Low–Medium	Chance-find procedure; training; stop-work	Low

5.5 Residual Risks

Despite robust mitigation, some residual risks may persist:

Low to Moderate risks related to:

- Minor construction nuisances.
- Limited biodiversity disturbance in non-critical habitats.
- Social tensions during land titling or registry verification.

These will be managed through:

- Continuous supervision and audits.
- Adaptive management based on monitoring results.
- Periodic stakeholder engagement to address emerging issues.

5.6 Assessment of Alternatives: No Project vs. Go-Ahead Project

The Analysis of Alternatives evaluates potential courses of action to identify the most sustainable, feasible, and beneficial option for achieving AGROW’s objectives. This assessment considers environmental, social, technical, and economic criteria in line with World Bank ESF and Nigeria’s agricultural development priorities.

5.6.1 No Project Alternative

Under this scenario, the AGROW Project would not be implemented, and existing agricultural systems would continue with minimal intervention. Current challenges—such as land degradation, inefficient production methods, high post-harvest losses, and low farmer incomes—would persist.

Implications of No Project Alternative:

- Continued rural poverty and vulnerability among smallholder farmers.
- Ongoing environmental degradation due to unsustainable land use and poor soil fertility management.
- Missed opportunities for climate-smart agriculture, improved productivity, and value chain development.
- Failure to meet national priorities for food security and agricultural modernization.

Conclusion: The No Project alternative is not recommended, as it conflicts with Nigeria’s Agricultural Promotion Policy (APP), climate resilience goals, and the World Bank’s sustainable development objectives.

5.6.2 Go-Ahead Project Alternative

This option involves implementing AGROW as designed, with its integrated components:

- **Component 1:** De-risking private sector investments in aggregation and offtake.
- **Component 2:** Public investments for modernization (research, extension, digital ecosystem).
- **Component 3:** Policy and enabling environment for inputs and land tenure.
- **Component 4:** Project coordination, monitoring, and evaluation.

Benefits of Go-Ahead Alternative:

- **Enhanced agricultural productivity** through improved access to quality inputs, infrastructure, and technology.
- **Strengthened food and nutrition security** at household and national levels.
- **Employment generation**, particularly for youth and women, fostering inclusive growth.
- **Promotion of climate-smart agriculture** and sustainable natural resource management.
- **Reduced environmental degradation** through adoption of efficient irrigation, soil health practices, and biodiversity safeguards.

Alignment: This alternative supports Nigeria’s APP, the National Agricultural Technology and Innovation Policy (NATIP), and the World Bank’s ESF principles, contributing to inclusive and sustainable agricultural transformation.

Conclusion: The Go-Ahead alternative is the preferred and most viable option, offering balanced environmental, social, and economic benefits that align with AGROW’s Project Development Objective (PDO).

Chapter 5 : Mitigation Measures and ESMP Framework

6.1 Introduction

This chapter defines the strategy for avoiding, minimizing, mitigating, and monitoring the environmental and social risks identified in **Chapter 5**. In full compliance with the **World Bank Environmental and Social Framework (ESS1–ESS10)**, this framework operationalizes the project's commitments through specific management instruments.

Core Management Instruments

To address site-specific impacts, the following instruments will be prepared, reviewed, disclosed, and implemented at the subproject level as required:

- **Environmental and Social Management Plans (ESMPs):** General mitigation and monitoring protocols.
- **Integrated Pest Management Plan (IPMP):** Safe handling and reduction of agro-chemicals.
- **Resettlement Action Plans (RAPs):** Management of land acquisition and physical/economic displacement.
- **Gender-Based Violence (GBV) / SEA-SH Action Plan:** Prevention and response protocols for sexual exploitation, abuse, and harassment.
- **Community Health and Safety Plans (CHSP):** Protection of local populations from project-related hazards.
- **Biodiversity Management Plans:** Conservation measures for affected natural habitats.

These instruments will be prepared, reviewed, disclosed, and implemented at subproject level as required.

The AGROW Project applies a **layered mitigation system**:

Level	Instrument
Strategic	ESMF, RPF, SEP, LMP
Subproject	ESMP, RAP, IPMP, SMP, Biodiversity Plans
Contractor	C-ESMP, OHS Plan, Traffic Plan, Waste Plan
Sensitive risks	GBV Action Plan, Security Management Plan

This framework ensures that **no subproject proceeds without appropriate, approved, and budgeted safeguards instruments**.

6.2 Mitigation Hierarchy

AGROW will apply the mitigation hierarchy to manage environmental and social risks across all components:

Avoidance

- Prioritize site selection on existing footprints or state-owned land to avoid displacement and habitat loss.
- Exclude critical natural habitats and culturally sensitive areas during planning.

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- Design interventions to minimize agrochemical use through climate-smart practices (e.g., SRI, UDP).

Minimization

- Reduce construction nuisances (dust, noise, traffic) through contractor ESMPs and best practices.
- Implement inclusive protocols to minimize social exclusion and gender bias in access to resources.
- Apply data minimization principles for digital systems to reduce privacy risks.

Mitigation

- Deploy pollution control measures (effluent treatment, dust filters, biomass reuse).
- Strengthen OHS programs: PPE, machine guarding, emergency response.
- Establish SEA/SH Action Plan and confidential grievance channels.

Compensation/Offset

- Provide compensation at replacement value and livelihood restoration for land acquisition impacts under ESS5.
- Implement biodiversity offsets if residual habitat impacts occur.
- Support social mediation and legal aid for land tenure disputes.

6.3 AGROW Project Mitigation Framework

6.3.1 ESS1–ESS10 Mitigation Framework

Table 6.1 present ESS1–ESS10 Mitigation Framework for the management of potential risks associated with AGROW project.

Table : Mitigation Measures and ESMP Framework.14: ESS1–ESS10 Mitigation Framework

ESS	Key Risks	Core Mitigation Measures	Mandatory Mitigation Instruments	Responsible Entity
ESS1 – Risk Management	Poor screening, unmanaged impacts	Screening, exclusion of High-Risk activities, preparation of ESMP/ESIA	ESMF, Screening Forms, ESMPs	FPCU, SPIUs
ESS2 – Labor	Injuries, child labor, unfair work	Fair recruitment, PPE, training, Worker GM	LMP, OHS Plans, Codes of Conduct	Contractors, SPIUs
ESS3 – Pollution & IPM	Pesticides, waste, wastewater	Waste control, IPM, effluent treatment	IPMP, Waste Plans, Chemical Safety Plans	Contractors, FMARD
ESS4 – Community Health & Security	Traffic, violence, guards	Traffic control, Codes of Conduct, survivor services	CHSP, SMP, Traffic Plans	SPIUs, Contractors
ESS5 – Land & Livelihoods	Displacement, loss of income	Compensation at replacement cost, livelihood restoration	RPF, RAPs, livelihood restoration	FMARD, States
ESS6 – Biodiversity	Habitat loss	Avoidance of critical habitats, mitigation plans	Biodiversity Screening, site plans	SPIUs
ESS7 – Indigenous Peoples	Exclusion (where applicable)	Screening; prepare IPPF if triggered	Culturally appropriate engagement	SPIUs
ESS8 – Cultural Heritage	Damage to sites	Chance finds procedures	Chance Find Procedures	Contractors
ESS9 – Financial Intermediaries	Indirect risk	Fund handling ESMS	FI E&S due diligence	ADMLF
ESS10 –	Exclusion, conflict	Inclusive consultations, GM	SEP, GM,	FPCU, SPIUs

Stakeholders		disclosure	
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6.3.2 Component - Specific Risks Mitigation

1. Component 1 – De-Risking Private Sector Investments in Aggregation & Off-take (ADMLF)

Component 1 finances physical agribusiness infrastructure, logistics, and market systems and therefore carries the highest environmental, land, labor, and security risk profile of AGROW.

A. Financial Intermediary Operational Risk Mitigation Guidance

To manage the FI-associated risks, the controls presented in Table 6.2 are mandatory:

Table : Mitigation Measures and ESMP Framework.15: Financial Intermediary Operational Risk Mitigation Guidance

Risk Category	Mitigation Strategy	ESMF Tool
ADMLF selection	Preparation and implementation of E&S risk management system	ESMS developed
Selection Risk	Use of the Project Exclusion List to automatically reject high-risk sectors.	Annex 46: Exclusion List
Compliance Risk	Making E&S milestones (e.g., PPE purchase) a condition for tranche release.	Milestone Table
Reporting Risk	Mandatory submission of the Annual E&S Performance Report (AEPR) .	Annex 48: AEPR
Social Risk	Requirement for all Grantees to establish a site-level Grievance Mechanism .	Annex 44 (GM)

B. Fund Management Functions and Controls

Fund Management Functions and Controls include:

- **Technical Appraisal:** The appraisal must include an **E&S Due Diligence (ESDD)** – **Annex 45**. If an aggregator lacks safety gear for their transport fleet, a **Corrective Action Plan (CAP)** must be part of the grant agreement.
- **Verification of Use-of-Funds:** During milestone verification, the Fund Manager must check for "E&S visible evidence" (e.g., presence of fire extinguishers in processing units, use of PPE by workers).
- **Conflict of Interest:** Ensure that E&S auditors are independent of the private offtakers they are inspecting.
- **Reporting:** The Fund Manager must submit the **Annual E&S Performance Report (AEPR)** - **Annex 48** to the FPCU, highlighting any injuries or grievances across the grant portfolio.

While Table 6.3 presents summary checklist for the fund manager manual, **Annex 38 – Annex 50** provides comprehensive guidance to align the ADMLF (Agribusiness Development & Matching Loan Fund) operations with the mandatory Environmental and Social (E&S) requirements.

Table : Mitigation Measures and ESMP Framework.16: Summary Checklist for the Fund Manager Manual

Step	Action Item	ESMF Reference
1. Screening	Is the activity on the Exclusion List?	Ch. 9 / Annex 46, Annex 47
2. Scoping	Does it need an ESMP or just Good Practice Clauses?	Ch. 9 / Matrix
3. Contracting	Are E&S Penalty Clauses in the Grant Agreement?	Annex 39: E&S Clauses
4. Supervision	Are site visits checking OHS and waste management?	Ch. 6 / Annex 44
5. Grievance	Does the Aggregator have a box for farmers to complain?	Ch. 8 / Annex 44

C. Component 1 Mitigation Measures and Applicable Instruments

Table 6.4 present component 1 risk-specific mitigation measures:

- Site selection using exclusion criteria; prioritize existing footprints/state lands; apply RPF/RAP where required.
- ESMPs and Contractor C-ESMP; dust/noise controls; waste segregation; licensed disposal; chance-find procedures.
- OHS program: machine guarding, lock-out/tag-out, PPE, training, first aid, incident reporting.

Risk	Description
A. Land, Displacement & Conflict (ESS5, ESS4)	
Risk	Mitigation
Displacement	Site screening; avoid resettlement where possible; ESS5-compliant RAPs where unavoidable.
Land disputes	Community validation; grievance window before site finalization.
Gender exclusion	Joint titling; women’s representation in land committees.
Security	Security Risk Assessment and SMP for all sites.
Instruments: RPF, RAPs, Security Management Plans, GM	
B. Construction, Labour & OHS (ESS2, ESS4)	
Injuries	Contractor ESMPs, PPE, traffic management, machinery guards.
Child labor	Labor audits and Code of Conduct.
Community safety	Site fencing, signage, yard traffic plans.
Injuries	Contractor ESMPs, PPE, traffic management, machinery guards.
Instruments: LMP, C-ESMPs, OHS Plan	
C. Environmental Pollution and Food Safety (ESS3)	
Wastewater	Effluent treatment or reuse for irrigation.
Solid waste	Composting, briquetting, licensed disposal.
Aflatoxin	Testing protocols, SOPs, traceability.
Refrigerants	Use of low-GWP systems
Instruments: Waste & Pollution Control Plans, IPMP	
D. Social Inclusion & Market Power (ESS10)	
Exclusion	Contract transparency; quotas for women/youth.
Price abuse	Standard contracts and grievance channels.
Instruments: SEP, GM, BDS Programs	

- Pollution control: effluent pre-treatment; dust filters; biomass residue management; hazardous waste handling.
- Traffic safety management: routing, speed limits, signage; community awareness.
- Food safety SOPs: moisture control (<13–14%), aflatoxin screening, hygienic storage.
- Gender & inclusion measures: participation targets; SEA-SH Action Plan; Codes of Conduct; gender-sensitive GM.
- Capacity building for off-takers/cooperatives on ESF compliance; disbursement linked to E&S milestones.

Table : Mitigation Measures and ESMP Framework.17: Component 2 Risk-Specific Mitigation Measures

2. Component 2 – Public Investments for Modernization

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This component introduces technologies, inputs, data systems and extension, creating biosafety, data, labor and chemical risks.

Component 2 Risk Specific Mitigation Measures and Applicable Instruments

Table 6.5 present component 2 risk-specific mitigation measures:

Component 2.1: Research & Extension

- Integrated Pest & Vector Management Plan (IPMP); safe handling and storage SOPs; promote UDP/SRI to reduce inputs.
- Site screening for demo plots; avoid critical habitats; small-scale ESMPs and community agreements.
- LMP/OHS provisions: training; scheduling to avoid heat stress; potable water at sites.
- Inclusive extension strategy with quotas/targets for women and youth; accessible training materials.
- SEA-SH Action Plan for events; separate sanitation facilities; Codes of Conduct.

Component 2.2: Digital Agriculture

- Data Protection Impact Assessment (DPIA); governance framework (consent, minimization, retention, access controls).
- Inclusive enumeration protocols (gender-responsive scheduling; local languages; accessibility; multiple advisory channels).
- Enumerator safety plan; SEA-SH preventive measures; GM accessible via digital and non-digital means.
- E-waste management plan (procurement with take-back; certified disposal).
- ESMPs for ICT roll-out; SEP for digital services; LMP for field teams; SEA-SH Action Plan.

Table : Mitigation Measures and ESMP Framework.18: Component 2 Risk-Specific Mitigation Measures

Risk	Mitigation
Sub-Component 2.1 – Research, Extension & Technology Transfer	
Chemical exposure	Integrated Pest Management; PPE; training.
Soil/water pollution	Precision nutrient management (SRI, UDP).
Worker & farmer safety	OHS protocols; tool safety.
Gender exclusion	Women-focused extension and quotas, implementation of an effective grievance mechanism
Instruments: IPMP, OHS Plan, SEP	
Sub-Component 2.2 – Digital Agriculture Ecosystem	
Privacy	Data protection, consent, restricted access.
Exclusion	Multi-channel platforms (SMS, IVR, radio).
Enumerator security	Security-aware field protocols.
Registry disputes	GM and transparent verification.
Instruments: Data Governance Framework, GM, Security Screening	

D. Component 3 – Policy & Enabling Environment for Inputs Markets and Land Tenure

Component 3 supports reforms and systems that will shape how seeds, fertilizers, and land rights are governed nationwide. These reforms have high leverage but also high social, governance and conflict sensitivity, particularly in Nigeria’s fragile rural context.

Component 3 Risk Specific Mitigation Measures and Applicable Instruments

Table 6.6 present component 3 risk-specific mitigation measures:

- ESMPs for lab upgrades (hazardous waste management, ventilation, spill response).
- Transparent, inclusive policy processes under SEP; stakeholder committees including women/youth and private sector.
- Gender-responsive land titling protocols; social mediation; legal aid links; RPF if displacement arises.
- SEA-SH procedures: survivor-centered referral pathways; Codes of Conduct; confidential reporting.
- LMP/OHS: lab safety training, PPE, chemical hygiene plans.

Table : Mitigation Measures and ESMP Framework.19: Component 3 Risk-Specific Mitigation Measures

Risk	Description
A: Land Tenure & Certification (ESS5, ESS4, ESS10)	
Land disputes	Apply conflict-sensitive land screening; require community validation before issuing certificates; establish mediation panels.
Elite capture	Transparent beneficiary lists; public disclosure; grievance window before final certification.
Gender exclusion	Quotas for women and youth; joint titling; legal literacy campaigns.
Displacement	ESS5-compliant RAPs or livelihood restoration where access is affected.
Security	Security Risk Assessment and Security Management Plan for all titling areas.
Instruments: RPF, site-specific RAPs, SEP, Security Plan, GM	
B: Seed System Reforms (ESS2, ESS3, ESS10)	
Exclusion of small producers	Tiered licensing and subsidized compliance for SMEs.
Loss of informal livelihoods	Transition programs and training for informal dealers.
Data misuse	Data protection, consent, and restricted access protocols.
Corruption	Digital tracking, audits, and public dashboards.
Instruments: LMP, IPMP, Digital Data Protection Framework, GM	
C. Fertilizer Regulation (ESS3, ESS2, ESS4)	
Hazardous chemical exposure	Lab OHS plans, ventilation, PPE, spill response.
Informal trader displacement	Gradual enforcement; compliance support.
Market disruption	Phased implementation with communication campaigns.
Corruption	Independent third-party inspections; digital labeling.
Instruments: OHS Plans, Waste & Chemical Management Plans, SEP	

E. Component 4 – Project Coordination, Monitoring & Evaluation

Component 4 manages AGROW’s ESF system and therefore carries governance, integrity, GBV, and reputational risk if weakly implemented.

Component 4 Risk Specific Mitigation Measures and Applicable Instruments

Table 6.7 present component 4 risk-specific mitigation measures:

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- ESMF implementation plan; annual E&S audits; performance-based disbursement linked to ESF compliance.
- GM SOPs including SEA-SH survivor-centered protocols; anonymity; escalation paths.
- M&E ethics: consent procedures; secure data storage and anonymization.
- Training plan with minimum standards and periodic refreshers.

Table : Mitigation Measures and ESMP Framework.20: Component 4 Risk-Specific Mitigation Measures

Risk	Mitigation
A: ESF Governance & Capacity	
ESF failure	Dedicated E&S, GBV, OHS, and M&E specialists in FPCU and SPIUs.
Poor supervision	Annual ESF audits; quarterly Bank reporting.
Contractor non-compliance	E&S performance tied to payments.
Instruments: ESCP, ESMF, Institutional Capacity Plan	
B: GM and SEA-SH	
Survivor harm	Survivor-centered, confidential channels; referral pathways.
Retaliation	Anonymous reporting; whistle-blower protections.
Poor response	Mandatory timelines; Bank-level escalation.
Instruments: SEP, GM Protocol, SEA-SH Action Plan	
C: Security & Incident Management	
Violence or intimidation	Security Incident Reporting Protocol.
Cover-ups	Direct reporting to World Bank.
Contractor abuses	Sanctions and contract termination.
Instruments: Security Management Plan, Incident Log, Codes of Conduct	
Overlapping projects	Joint planning with roads, power, irrigation agencies.
Environmental overload	Cumulative impact screening.
Instruments: Inter-agency coordination protocols, ESMP integration	

6.4 Security Management Framework

The project would manage associated security risks through a tiered Security Management Plan (SMP) as outlined in Table 6.8.

Table : Mitigation Measures and ESMP Framework.21: AGROW Project Tiered Security Management Plan

Level	Risk Scenario	Security Strategy
Low	Routine theft / petty crime	Use of unarmed private security guards and physical fencing.
Medium	Civil unrest / localized disputes	Community-based security (Vigilantes) + active Stakeholder Engagement.
High	Banditry / Active conflict	Coordination with State Security Forces (Police/Military) under a formal MoU.

6.4.1 Protocol for Using Security Personnel (ESS4 Requirements)

If the Project (or a Grantee) hires security, the following **World Bank Rules** apply:

- **Vetting:** Security personnel must be screened to ensure they have no history of human rights abuses or sexual violence.
- **Rules of Engagement:** Guards must be trained on the **Voluntary Principles on Security and Human Rights**, emphasizing the use of force only as a last resort.
- **SEA/SH Code of Conduct:** Security staff must sign the project’s Code of Conduct prohibiting harassment of community members or workers.
- **Grievance Channel:** Communities must be able to report security guard misconduct through the project GM.

6.5 Compliance and Enforcement

This chapter establishes the mechanisms to ensure that AGROW investments remain safe, inclusive, conflict-sensitive, and environmentally sound. Adherence to these protocols is mandatory to meet World Bank appraisal, legal, and disclosure requirements within the Nigerian context.

Enforcement Mechanisms and Sanctions:

To maintain high safeguard standards, performance is directly tied to contractual obligations. Failure to implement agreed-upon mitigation measures will result in a tiered enforcement approach:

- **Financial Sanctions:** Withholding of progress payments until compliance is achieved.
- **Operational Restrictions:** Immediate suspension of works at the specific site or subproject.
- **Contractual Remedies:** Formal contract termination for persistent or severe breaches.
- **Remediation:** Mandatory implementation of time-bound **Corrective Action Plans**.

Oversight and Reporting Protocols:

To ensure transparency and rapid response, the oversight rules highlighted in Table 6.9 apply to all AGROW activities:

Table : Mitigation Measures and ESMP Framework.22: Oversight and Reporting Protocols

Requirement	Protocol
Incident Reporting	Serious environmental, social, or security incidents must be reported to the World Bank within 48 hours .
Payment Integration	Safeguard performance indicators are embedded in contract payment schedules.
External Verification	Periodic independent audits will be conducted to verify field-level compliance and the effectiveness of E&S instruments.

Chapter 7: Institutional Arrangements and Capacity Building

7.1 Introduction

This section defines the institutional architecture, decision rights, and capacity-building program for the AGROW ESMF in line with the World Bank ESF (ESS1–ESS10) and the implementation and risk-management logic reflected in the PAD (i.e., institutional arrangements, implementation support plan, risk-based M&E). It ensures that screening, assessment, permitting, implementation, monitoring, and adaptive management are executed consistently across federal and state levels, with transparent stakeholder engagement and responsive GMs.

7.2 Institutional Arrangements for ESMF Implementation

7.2.1 Detailed Implementation Coordination Roles

1. The World Bank: The Guardrail

The World Bank does not just provide the loan; it acts as the "Standard Bearer." Under the **Environmental and Social Framework (ESF)**, the Bank:

- Conducts periodic supervision missions to project sites.
- Provides "No Objection" clearances for major contracts and E&S plans.
- Monitors the implementation of the Labor Management Procedures (LMP).

2. Federal Ministry of Agriculture & Food Security (FMAFS)

The Ministry is the **Owner** and **Lead Agency** for the project.

- **Policy Formulation:** Defines the national agricultural priorities (e.g., specific value chains like rice, maize, or cassava).
- **Strategic Oversight:** Chairs the National Project Steering Committee to approve annual work plans and budgets.
- **Inter-Ministerial Liaison:** Coordinates with other ministries (Environment, Water Resources, Finance) to remove bureaucratic bottlenecks.
- **Resource Mobilization:** Ensures the federal government meets its counterpart funding obligations.

3. Federal Project Management Unit (FPMU)

The FPMU acts as the **National Coordinator** on behalf of the Ministry.

- **Technical Support:** Provides guidance to all participating State units (SPIUs) to ensure uniform implementation.
- **E&S Consolidation:** Aggregates Environmental and Social reports from all states to submit to the World Bank.

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- **Procurement Oversight:** Conducts high-level procurement for international consultants and cross-state services.
- **Monitoring & Evaluation (M&E):** Tracks the project's performance against the Project Development Objectives (PDOs).

4. State Project Implementation Unit (SPIU)

The SPIU is the **Primary Engine Room** where the actual work happens.

- **Day-to-Day Management:** Responsible for the direct execution of sub-projects (e.g., irrigation or processing hubs).
- **Contract Management:** Hires and supervises Contractors and Service Providers.
- **Financial Management:** Manages the project's state-level designated account and prepares interim financial reports.
- **E&S Screening:** Performs the initial environmental and social screening for every site-specific activity to determine its risk level. Key E&S responsibilities of SPIUs include:
 - Conducting E&S screening of subprojects
 - Supervising implementation of site specific ESMPs, RAPs, and other instruments
 - Engaging stakeholders at the community level and operate GMs
 - Maintaining E&S records and reporting to the FPMU

Where State Environmental Protection Agencies exist, SPIUs coordinate permitting/submissions per delegated mandates while FMEnv retains federal oversight. Each participating state (and the FCT) establishes a State Project Implementation Unit (SPIU) with E&S specialists and operational teams as outlined:

- **Environmental Specialist** (ESIA/ESMP, pollution/OHS, biodiversity, climate resilience)
- **Social/Resettlement Specialist** (ESS5 RAP/LRP, vulnerable groups, livelihood restoration)
- **Stakeholder Engagement/GM Officer** (ESS10)
- **Gender/GBV/SEAH Officer** (cross-cutting; aligns with ESF/contractor CoC)
- **OHS Officer** (ESS2/ESS4)
- **M&E/Data Officer** (results, indicators, dashboard)

5. Local Government Councils (LGCs)

The LGCs provide **Local Legitimacy** and **Regulatory Support**.

- **Land Administration:** Assists in identifying land for agricultural hubs and helps in the verification of land ownership.
- **Liaison Officers:** Appoint a "Desk Officer" to serve as a bridge between the SPIU and the local farmers.
- **Maintenance:** Takes over the maintenance of small-scale rural infrastructure (like feeder roads) after the project is completed.
- **Extension Services:** Coordinates local agricultural extension workers to train farmers on new technologies.

6. Community-Based Organizations (CBOs)

CBOs represent the **End Users** and ensure **Social Accountability**.

- **Beneficiary Selection:** Helps identify the most vulnerable farmers (including women and youth) to ensure they aren't excluded from project benefits.

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- **Grievance Redress:** Often forms the first tier of the Grievance Redress Committee (GRC) to resolve local disputes (e.g., crop damage by a contractor) without going to court.
- **Social Monitoring:** Acts as the "eyes on the ground" to ensure contractors respect local labor laws and do not engage in harmful practices like child labor.

7. Consultants: The Technical Backbone

Consultants are typically third-party firms hired by the SPIUs to fill technical gaps. Their roles include:

- **Design Consultants:** Ensuring that irrigation or processing hub designs minimize land displacement.
- **Supervision Consultants:** Acting on behalf of the government to watch the contractors daily. If a contractor violates an environmental rule, the Supervision Consultant has the power to halt work.

8. Contractors & Service Providers: The Implementation Frontline

Contractors are the ones most likely to cause environmental or social "footprints." Their legal obligations under the ESMF include:

- **Developing C-ESMPs:** Before a shovel hits the ground, the contractor must turn the general project framework into a site-specific action plan.
- **Code of Conduct:** Every worker hired by a contractor must sign a code of conduct regarding **Sexual Exploitation and Abuse (SEA)** and **Gender-Based Violence (GBV)**.
- **Waste & Health Management:** Responsible for managing construction waste and providing PPE to all laborers.
- **Labor Management procedure:** responsible for setting out the way in which project workers will be managed, in accordance with the requirements of national law and ESS 2.
- **Workers Grievance Mechanism:** responsible for the provision of a grievance mechanism for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns in line with ESS2 requirements. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against any reprisal for its use.

9. Financial Intermediary Operational Guidance

- **Baseline and Sensitivity**
 - **Guidance:** Before awarding grants for "Aggregation Centers," the Fund Manager must verify that the proposed site is not in a flood zone or sensitive wetland.
- **Procedures for Sub-project Screening**
 - **Guidance:** Every grant application must include a completed **Annex 22: Environmental and Social Screening Report (ESSR)**.
 - **Milestone Tie-in:** The first tranche disbursement should only occur *after* the Fund Manager verifies the borrower has obtained necessary local environmental permits.
- **Impact Mitigation (ESS1 - ESS10)**
 - **Labor (ESS2):** Offtakers must ensure "embedded services" do not involve child labor in the last-mile distribution.
 - **Pesticides (ESS3):** If grants cover "inputs," the Fund Manager must enforce the **Integrated Pest Management Plan (IPMP)**.
 - **Land (ESS5):** Joint Business Plans must prove that land used for aggregation centers was acquired through willing-buyer/willing-seller arrangements or communal consent, not forced displacement.
- **Stakeholder Engagement (SEP)**

- **Guidance:** The "Joint Business Plans" between offtakers and cooperatives must be developed through **Free, Prior, and Informed Consultation**. Evidence of meetings with farmer groups must be attached to the grant application.

7.2.2 Detailed Roles of the Regulatory Bodies

1. Federal Ministry of Environment (FMEnv)

The Ministry is the highest regulatory authority in Nigeria for environmental matters. Under AGROW, its specific role is:

- **EIA Certification:** Before any large-scale infrastructure (like a processing hub or irrigation dam) begins, the FMEnv must review the Environmental Impact Assessment and grant a certificate.
- **Public Disclosure:** Facilitate the mandatory 21-day public display of project documents to gather community feedback.
- **Impact Mitigation Monitoring (IMM):** Conduct periodic site visits to ensure the project is sticking to the mitigation plans they approved.

2. NESREA (National Environmental Standards and Regulations Enforcement Agency)

While the Ministry handles the *approvals*, NESREA handles the *enforcement*. Roles includes:

- **Setting Standards:** Ensuring the AGROW project follows standards for water quality, air emissions, and pesticide use (Integrated Pest Management).
- **Inspections:** Have the power to visit project sites unannounced to check if the contractor is dumping waste illegally or exceeding noise limits.
- **Sanctions:** Can issue fines or stop work if the project violates the National Environmental Regulations.

3. SEPA (State Environmental Protection Agencies)

Because AGROW is implemented at the state level, SEPA (e.g., LASEPA in Lagos, KASEPA in Kano) are the primary regulators on the ground:

- **State Compliance:** Ensure the project respects state-specific environmental laws which can sometimes be stricter than federal ones.
- **Pollution Control:** Focus heavily on the "brown" issues—monitoring how agricultural processing waste (liquid and solid) is being handled so it doesn't contaminate local water sources.
- **Collaboration:** Work closely with the State PIU to verify that all sub-projects are screened correctly.

Table 7.1 presents the institutional governance levels of the ESMF implementation.

Table Chapter 7: Institutional Arrangements and Capacity Building .23: Institutional Framework for AGROW

Governance Level	Key Institutions / Units	Primary Functions
Financing & Global Oversight	The World Bank	Standard Setting: Provides funding (\$500m) and ensures all activities meet Environmental and Social Standards (ESS). Reviews and clears all E&S instruments .
Federal Level	Federal Project Coordination Unit (FPCU); Federal Ministry of Agriculture & Food Security	Policy & Oversight: National coordination, setting E&S standards, overall monitoring, and reporting to the World Bank.
State Level	State Project Implementation Units (SPIU); State Ministry of	Implementation: Direct management of sub-projects, day-to-day E&S screening, and ensuring

	Agriculture	state-level compliance.
Regulatory Policy & Federal Approval	Federal Ministry of Environment (FMEnv)	Regulatory Oversight: Reviews and approves Environmental Impact Assessments (EIAs). Issues the Environmental Impact Statement (EIS) required to start work.
Enforcement (National)	NESREA	Compliance & Enforcement: Enforces national environmental regulations (pollution, waste, noise). Conducts environmental audits during and after project completion.
Enforcement (State)	SEPA's (State Env. Protection Agencies)	Local Monitoring: Monitors project sites within their specific states to ensure waste disposal and land use comply with state laws.
Local Gov. Level	Local Government Councils; Desk Officers	Liaison: Acting as an interface between the community and the State; providing local regulatory support.
Community Level	Community-Based Organizations (CBOs); Grievance Redress Committees	Participation: Monitoring local impacts, managing local grievances, and ensuring project benefits reach targeted farmers.
Technical Design	Consultants	Studies & Planning: Prepare site-specific ESMPs and resettlement plans. Provide technical expertise that regulators review.
Physical Execution	Contractors & Service Providers	Direct Compliance: Execute work according to the Contractor-ESMP . Responsible for site safety and pollution control.

7.3 Capacity Building and Training Strategic Framework

The capacity-building program is designed to bridge the gap between high-level World Bank Environmental and Social Standards (ESS) and the practical reality of Nigerian agricultural infrastructure development.

7.3.1 Target Groups & Training Focus

The training is not "one-size-fits-all." It is tailored to the specific influence of each actor:

- **FPCU/SPIUs:** Focus on **oversight, data dashboards, and procurement integration**—ensuring E&S requirements are written into every contract.
- **Contractors & Engineers:** Focus on **Occupational Health and Safety (OHS)**, waste management, and the enforcement of the **Worker Code of Conduct**.
- **Regulators (FMEnv/NESREA):** Focus on aligning project monitoring with **Nigeria's EIA Act** and permitting timelines.
- **Community/CBOs:** Focus on the **Grievance Mechanism (GM)** and identifying potential social impacts (e.g., land issues or GBV).

7.3.2 Implementation Roadmap: The 12-Module Curriculum

To ensure comprehensive coverage, the training is organized into twelve specialized modules:

Table Chapter 7: Institutional Arrangements and Capacity Building .24: Implementation Roadmap Training Module

Theme	Module Focus	Key Outcome
Foundational	- ESF Core & Risk Management	Understanding ESS1–ESS10.
Legal/Regulatory	- Nigeria EIA Act & Permitting	Streamlining certificates and hearings.

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Social & Human	- Resettlement (RAP/LRP) - Stakeholder Engagement	Fair compensation and transparent dialogue.
Safety & Health	- Labor & OHS - Community Health & Safety	Zero accidents; safe traffic and labor influx.
Environment	- Pollution & Efficiency - Biodiversity - Cultural Heritage	Waste circularity and "nature-positive" design.
Project Management	- Data Systems/M&E - Procurement Integration	Turning E&S data into management decisions.

To support the institutional strengthening goals of the AGROW Project, under listed are the relevant Annexes to guide the guide the capacity implementation:

- Annex 14: AGROW Project: Pesticide Safety & IPM Field Brief
- Annex 29: Capacity Needs Assessment Survey (SPIU Level)
- Annex 3 0: Training Attendance and Evaluation Log
- Annex 41: Environmental & Social (E&S) Excellence Training Module for ADMLF Grantees

7.3.3 Training Methodology: Beyond the Classroom

To ensure the training "sticks," AGROW utilizes four distinct approaches:

1. **Targeted Workshops:** For decision-makers to understand policy implications.
2. **On-Site Training:** Real-time demonstrations on construction sites (e.g., how to manage a "Chance Find" of cultural heritage).
3. **Continuous Learning:** Refresher courses to address "complacency fatigue" midway through the project.
4. **Knowledge Sharing:** A "Community of Practice" where a successful SPIU in one state shares its GM success stories with another.

Expected Impact

- **Reduced Liability:** Properly trained contractors are less likely to cause accidents or environmental spills that lead to project delays or fines.
- **Social License to Operate:** Stronger engagement skills mean fewer community protests and smoother land access.
- **Global Compliance:** Ensures the project remains in good standing with the World Bank, preventing funding suspensions due to E&S violations.

7.3.4 AGROW Capacity Building Budget Template

To ensure the AGROW capacity-building program is both actionable and trackable, the following budget template and training calendar have been developed. These align with the 12-module curriculum and the project's \$500 million investment scale. Table 7.3 present the AGROW capacity building budget template. This template allows the FPCU and SPIUs to estimate costs per training cycle.

Table Chapter 7: Institutional Arrangements and Capacity Building .25: AGROW Capacity Building Budget Template

Line Item	Description	Unit Cost (\$)	Qty	Total (\$)
Technical Consultants	Lead ESF Trainers and development of training module	\$800/day	60 days	\$48,000
Venue & Logistics	Rental, AV equipment, and internet	\$1,500/session	12 sessions	\$18,000
Participant Costs	Per Diem (FPCU, SPIU, Regulators)	\$150/person	30 people	\$4,500
Community Outreach	Transport & Refreshments for	\$500/session	10 sessions	\$5,000

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	CBOs/LGCs			
Materials	Printed ESF Manuals, PPE for On-site training	\$50/set	100 sets	\$5,000
M&E / Reporting	Post-training impact assessment	\$2,000	2 cycles	\$4,000
Contingency (10%)	Emergency logistical adjustments	-	-	\$8,450
Total Estimate	Per Training Cycle (12 Modules)			\$92,950

7.4 Institutional Risk Management and Adaptive Measures

The interface between the FPMU, State SPIUs, and regulators (FMEnv/NESREA) is often where projects stall. While **Annex 8** present permits and approvals tracker template, **Annex 9** present sample MoU for inter-agency coordination which defines the collaborative framework and timelines for the screening, scoping, review, and certification of Environmental and Social Impact Assessments (ESIAs) and other regulatory instruments required for the AGROW Project. Table 7.4: present the institutional risk management and adaptive measures in alignment with relevant Annex.

Table Chapter 7: Institutional Arrangements and Capacity Building .26: Institutional Risk Management and Adaptive Measures

Risk Area	Key Adaptive Measure	Impact on Project
Permitting Delays	MOUs & SLAs: Formal agreements between Agriculture and Environment Ministries to fix review timelines.	Prevents work stoppages due to expired or missing EIA certificates.
Institutional Overlap	SIS Permit Tracker: A digital dashboard to flag when a permit is stuck at a specific agency.	Accountability: It becomes clear exactly which agency is causing a bottleneck.

Chapter 8: Stakeholder Engagement, Information Disclosure, and Grievance Redress

8.1 Introduction

The AGROW project recognizes that its success depends on open, transparent, and continuous engagement with its diverse stakeholders. This chapter outlines the framework for ensuring that all parties—from federal ministries to smallholder farmers—are meaningfully involved throughout the project lifecycle.

8.2 Objectives of Stakeholder Engagement

The primary objectives for the AGROW stakeholder engagement strategy are:

- **Establish a systematic approach** to engagement that identifies and involves all affected and interested parties.
- **Ensure inclusivity** by actively seeking the participation of vulnerable groups, including women, youth, and historically underserved communities.
- **Promote transparency** through the timely disclosure of project information and environmental and social instruments.
- **Maintain a functional Grievance Mechanism (GM)** to resolve concerns promptly and fairly.

8.3 Stakeholder Identification and Analysis

Based on the AGROW Project Environmental and Social Management Framework (ESMF), the Stakeholder Analysis Matrix identifies and categorizes the parties affected by or interested in the project to ensure targeted and inclusive engagement. This matrix in table 8.1 below supports compliance with World Bank ESS10 and national consultation requirements.

Table 8.1: Stakeholder Analysis Matrix

Stakeholder Category	Key Stakeholder Groups	Level of Interest / Influence	Engagement Goals & Methods
Directly Affected Parties	Smallholder farmers (including women and youth), cooperatives, agribusinesses, and Project-Affected Persons (PAPs).	High Interest / High Influence: Directly impacted by land acquisition, infrastructure, and modernization efforts.	Goal: Ensure fair compensation, technical training, and benefit-sharing. Methods: Town halls, focus groups, and on-farm demonstrations.
Vulnerable Groups	Female-headed households, youth-led farms, non-literate farmers, and remote rural communities.	High Interest / Low Influence: May face barriers to participation or information.	Goal: Promote social inclusion and prevent gender-based violence (GBV) or exclusion. Methods: Local language radio, female-only focus groups, and sign language support
Government & Regulators	Federal Ministry of Agriculture (FMAFS), FMEEnv, NESREA, SEPA, and State Ministries	Moderate Interest / High Influence: Responsible for policy, permitting, and regulatory oversight	Goal: Align project activities with national laws and environmental standards. Methods: Periodic technical committees, official workshops, and progress reports
Private Sector & Partners	Fertilizer manufacturers, seed companies, and technology providers	High Interest / Moderate Influence: Drive value-chain modernization and	Goal: Incentivize high-quality inputs and traceability in the supply chain.

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		private investment	Methods: Business forums, consultation on regulatory reforms, and MoUs.
Project Implementation	Federal Project Coordination Unit (FPCU), State PIUs, and World Bank.	High Interest / High Influence: Responsible for fiduciary and safeguard compliance.	Goal: Execute the ESMF and maintain the "Guardrail" of safety standards. Methods: Supervision missions, project website, and the SIS Dashboard.
Local Authorities & Civil Society	Local Government Councils, CBOs, NGOs, and traditional leaders.	Moderate Interest / Moderate Influence: Facilitate local access and community grievance redress	Goal: Maintain "Social License to Operate" and monitor local impacts. Methods: Grievance Redress Committees (GRCs) and public disclosure sessions

8.4 Key Engagement Principles

- **Inclusive Communication:** Materials will be translated into local languages and provided in accessible formats (e.g., USSD, IVR, or signage) for remote communities.
- **Transparent Disclosure:** Environmental and social instruments must be disclosed locally and online prior to any civil works.
- **Active Feedback Loops:** Quarterly analysis of the Grievance Mechanism (GM) statistics will be used to identify systemic issues and adapt project management.
- **Confidential Channels:** Specialized pathways for SEA/SH incidents ensure survivor safety through direct reporting to female focal points and vetted service providers.

8.5 Information Disclosure

Information disclosure will follow both Nigerian regulatory requirements and World Bank standards. All E&S instruments (ESMF, SEP, LMP, RAPs, etc.) must be cleared and disclosed prior to the commencement of civil works.

- **Public Display:** Draft instruments will be displayed at FMEnv, SEPA offices, and Local Government Council secretariats for a mandatory 21-day period.
- **Digital Access:** All documents will be published on the **FMAFS/AGROW** project website and the World Bank's External Website.
- **Community Sensitization:** Key project details will be summarized in local languages and shared via community radio, notice boards, and town hall meetings.

8.6 Grievance Mechanism (GM)

The AGROW GM is designed to provide a transparent and accessible pathway for resolving complaints without cost or fear of retribution

8.6.1 Multi-Channel Intake

Complaints can be submitted at the community/project site level (traditional/community systems), state level (state institutions), SPIU, SERVICOM and national level (FPCU, FMAFs). complaints can be lodged via:

- **Walk-in:** Dedicated help desks at SPIU and Local Government offices.
- **Grievance uptake channels:** GM Boxes, Toll-free hotlines, SMS/WhatsApp, email, grievance web portal.
- **Grievance Redress Committees (GRCs)** at the various levels, and through their focal points.
- **Community-based channels:** Traditional leaders, farmers' associations, cooperatives.
- **Boxes:** Secure suggestion/complaint boxes at construction sites and aggregation centers.
- All participating states GM systems will be designed through and along the SERVICOM Electronic Grievance Mechanism (E-GM) system. SERVICOM will provide the design protocol using the GM service standard.

8.6.2 Guiding Principles

- To effectively manage grievances, there are basic principles that must be followed. The key principles include the following:
- **Accessibility to the GM:** Multiple channels for lodging complaints (in-person, phone, SMS, digital, focal points, etc.)
- **Responsiveness:** It is essential that a GM should be responsive to the needs of its beneficiaries and non-beneficiaries. It should ensure that grievances are acknowledged and issues resolved promptly, and in a timely fashion.
- **Feedback, Transparency, and Fairness:** All responses to the complainant in a grievance process that moves beyond a unit level must be communicated in writing and/or by verbal presentation to the complainant. This will include a follow up on the corresponding authority where cases are referred, to ascertain the status of reported cases. Feedback on outcome of each case should get to the complainant through the secretary of committee or social contact/safeguard person as the case may be. It is expected that reported complaints at each level will be resolved and determined within 10 days from date of receipt of the complaint.
- **Confidentiality:** Especially as it relates to GBV/SEA/SH complaints.

8.6.3 Membership of Grievance Redress Committees

The specific composition of the GRC will vary depending on the location and context as will be defined in the site-specific Environmental and Social Management Plans (ESMPs) to be prepared for sub-projects. In general membership of the GRC for the 3 levels of grievance uptakes shall comprise of the following persons: *1st Level GRC at the Site/Community Level*

- These people shall be nominated from the project communities, and they will be directly and easily accessible to stakeholders.
- The traditional Ruler/District head or a person appointed by him from his council;
- The village head;
- The Woman representative;
- Representatives of identified farmer associations;
- 2 Representatives of PAPs including at least a woman;
- There will also be a dedicated GBV-GM focal person in the committee, this can be one of the women stated above or an additional person ensuring the selected person is competent and qualified to handle such cases confidentially.
- This committee will be responsible for receiving and addressing complaints at the project level and can escalate unresolved complaints to higher level GRCs. The GM Focal person (Secretary) will ensure proper documentation of complaints received and addressed using grievance logs, and/or electronic channels. Details on the logbook is provided in section 6.5.4 below while the GM process is provided in table 6.1 below.

2nd Level GRC at the SPIU Level

- The state project coordinator shall constitute a team within the SPIU to receive, hear and address complaints arising from the project. Grievances unsolved at the community level GRC will be escalated to the SPIU level. Membership of the team shall be as follow:
- State Project Coordinator (Chairperson);
- Social/Livelihood Officer (Secretary);
- GBV Officer
- Communication officer/ Public relations officer;

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- Environmental Officer;
- Monitoring and Evaluation officer; and
- The Project Engineer.
- This committee will be responsible for receiving and addressing complaints that are escalated from the 1st level or directly from complainants, and can also escalate unresolved complaints to higher level GRCs. This committee will also be trained by GM specialists on effective grievance handling process. The Social Officer will ensure all GM activities are designed through and along the SERVICOM E-GM system.

3rd Level SERVICOM

- SERVICOM will support the project by providing a design protocol using the GM service standard. All participating states GM systems will be designed through and along the SERVICOM E-GM system. This will include to design an electronic platform to enable the bank and the SPIU see all grievances and resolution status once logged in.

4th Level GRC at the FPCU (National) Level

- The National project coordinator shall constitute a team within the FPCU to receive, hear and address complaints arising from the project SPIU/PAPs. Grievances unsolved at the SPIU level GRC will be escalated to the FPCU level. Membership of the team shall be as follow:
 - National Project Coordinator (Chairperson);
 - FPCU Social/Livelihood Officer (Secretary);
 - FPCU GBV Officer
 - FPCU Communication officer/ Public relations officer;
 - FPCU Environmental Officer;
 - FPCU Monitoring and Evaluation officer; and
 - FPCU Project Engineer.

8.6.4 Grievance Log

- The GM Focal person will ensure that each complaint has an individual reference number and is appropriately tracked and recorded, and that actions are completed. The log also contains a record of the person responsible for an individual complaint, and records dates for the following events:
 - Date the complaint was reported.
 - Date the Grievance Log was uploaded onto the project database.
 - Date the information on the proposed corrective action sent to the complainant.
 - The date the complaint was closed out.
 - Date response was sent to complainant.
 - Monitoring Complaints

8.6.5 GM Handling Process and Timelines

This section provides a framework; however more specific timelines will be documented in the site-specific ESMPs that will be prepared for sub-projects.

Table 8.2: GRM Handling Process and Timelines

Step	Process	Timeline	Responsible Party
Step 1: Receipt & Registration	Complaint is received through any channel, logged into a grievance register with unique	Within 1–2 working days	GM Focal Person at the project level

	ID assigned per complainant.		
Step 2: Acknowledgement of Complaint	Complainant receives confirmation of receipt (verbal, SMS, or written).	Within 2 working days	GM Focal Person at the project level
Step 3: Screening & Categorisation	Complaint reviewed, classified under relevant category	Within 3–5 working days	1 st Level GRC
Step 4: Investigation & Resolution	Fact-finding with complainant, relevant MDAs, farmer groups, contractors etc. Resolution options explored. <i>(please note that this excludes GBV/SEA/SH related cases which should be handled as described in section 9.9 below)</i>	Within 5–15 working days (depending on complexity)	1 st Level GRC
Step 5: Communication of Outcome	Complainant informed of resolution decision and next steps. Agreement documented.	Within 2 working days after resolution	GM Focal Person
Step 6: Appeal/ Escalation	If complainant is unsatisfied, the case can be escalated to the 2 nd level (SPIU GRC)	Within 3 days of decision	GM Focal Person/ Complainant
Step 7: Investigation & Resolution at the 2 nd GRC Level	Fact-finding including review of resolution reached at the 1 st GRC level. Resolution options explored. Communicate resolution to Complainant. If unsatisfied at the 2 nd GRC level, the case can be escalated to SERVICOM.	Within 5–15 working days (depending on complexity)	Social Officer (SPIU GRC)
Step 8: Further Appeal/ Escalation	If complainant remains unsatisfied the case can be escalated to the FPCU GRC. Complainants may wish to seek judicial redress	Within 5 days of decision	SPIU Social Officer (SPIU GRC)/ Complainant
Step 9: Closure & Feedback	Case closed when complainant accepts outcome, or appeal resolved. Record updated in GM database.	Rolling basis	GM Focal Person/ SPIU Social Officer/ FPCU Social Officer

8.7 GBV/SEA/SH Related Complaints

Complaints of this nature will go through a different pathway from the regular GM due to the nature of confidentiality required in such instances. The AGROW project ESMF has defined a suitable GBV-GM. If a case on SEA/SH is received through the GM focal persons or through any other means, it will be treated with confidentiality, and the complainant will be referred to the relevant service provider as will be mapped by the various states. The GBV Focal Point/Social Officer of the SPIU will keep the information confidential to protect privacy of GBV/SEA/SH complainants. In cases, where the perpetrator(s) is linked to project activities, the contractor will take appropriate actions as per the Code of Conduct signed by the particular person and under the effective law in Nigeria. The project will report activities and outcomes of GBV and SEA surveillance and management to the World Bank on a regular basis.

8.8 Inclusivity of the GM

Vulnerable groups as defined in section 3.1.1, Table 3.1. Women, poor and marginalised communities may face numerous barriers in lodging complaints such as illiteracy, lack of knowledge about their rights, local culture and traditions, fear, discrimination, lack of access to technology, financial challenges, perceived hassle in complaining amongst others. Some strategies to reduce these barriers are:

- Establish grievance uptake locations in areas where poor and marginalized people live

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- Awareness materials, trainings and sensitisation on the GM should also be in local languages and should be brought as close as possible to different groups/areas as opposed to just a central location which may disenfranchise some persons
- There should be consideration for the locations and height of placement of complaint boxes to enable all persons access them
- Engage local intermediaries (liaison officers, community-based organizations, the leaders of such groups) to facilitate submission of grievances
- Deploy community-specific communication strategies to allay fears about, and increase comfort levels for submitting grievances;
- Ensure that there is no formal or informal charge for making grievances
- Phone lines should be toll-free
- Periodic focus group discussion should be held with such groups and they should be included in the monitoring and evaluation surveys
- Treat grievances confidentially, fairly and without prejudice

8.9 Informing Parties on Levels and Channels of Grievance Uptake

The SPIU Social Officer shall ensure that all stakeholders are informed early about the existence of the GM and sufficient information provided to them on the grievance uptake channels which includes channels that are culturally appropriate and permit for self-identified, confidential, or anonymous procedures. This information can be disseminated through consultations, pamphlets, posters, community meetings, radio etc. Awareness should include the following components:

- Scope of the project, planned project activities, etc.;
- Types of GRCs available; purposes for which the different GMs can be accessed, e.g., resettlement/compensation-related grievances.
- Members of the GRCs in that location and contact details
- How to access the GM
- How complaints can be reported to the GRC and to whom, e.g., phone, postal and email addresses, as well as information that should be included in a complaint
- Procedures and time frames for initiating and concluding the grievance redress process; boundaries and limits of GM in handling grievances
- The need for them to take part in GRC meetings and the steps of resolving process and timeline adopted in this mechanism

8.10 GM Monitoring and Reporting

Grievance resolution will be a continuous process in subproject level activities and implementation. The SPIU will keep records of all resolved and unresolved complaints and grievances (one file for each case record) and make them available for review as and when asked for by the Bank and any other interested persons/entities. The SPIU will also prepare periodic reports on the grievance resolution process and publish these on the AGROW Project website. The project will integrate the GM on a web-based dashboard, to adequately and promptly address any potential grievance. The Project Social officer will be responsible for:

- providing the grievance Committee with a weekly report detailing the number and status of complaints
- any outstanding issues to be addressed
- Monthly reports, including analysis of the type of complaints, levels of complaints, actions to reduce complaints and initiator of such action.
- Monitoring indicators include:

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- Number of grievances received/resolved
- Average resolution time in line with the stipulated timelines
- % resolved at community level
- Complainant satisfaction rate
- Access to the GM
- Inclusivity for vulnerable/marginalised groups
- Analysis of recurring grievances
- Consistency and fairness
- Number of awareness programs and trainings on the GM
- Demands for sexual favours in exchange for access to project benefits or services.

- Sexual harassment by project staff, contractors, or community leaders.
- Exploitation of vulnerable women, girls, or youth in the value chain.
- Intimidation, coercion, or gender-based discrimination in participation.
- Inadequate or unsafe project facilities increasing GBV/SEA/SH risks (e.g., poorly lit storage/processing centres).
- Stigmatisation or retaliation against survivors reporting GBV/SEA/SH.

8.11 Summary of Stakeholders consultation

A total of five Focus Group Discussions with strata of statutory stakeholders namely the Federal Ministries of Agriculture & Food Security (FMA&FS), Environment (EA Department, Women Affairs and FMEEnv), Labour and the Department of Farm Input and Support Service (FISS) between 20th August and 9th October 2025. The summary of the general response of stakeholders for the ESMF is presented in Table 8.2 while the attendance of the stakeholders met and the concerns of the various stakeholders are presented in Annex 2.1-2.2. Also, the visual evidence of consultation activities is presented below in Plates 8.1 and 8.2.

Table 8.2: Summary of Stakeholders’ Engagement

Summary of Stakeholders’ Engagements for the ESMF of AGROW Project		
	Date of Consultation	20 th August – 9 th October 2025
	Language(s) of Communication	English
	Mode	Hybrid (physical and online)
Introduction	The purpose of the AGROW project was explained to the various stakeholders including the essence of conducting the ESMF study.	
Group of Stakeholders	General Concerns of Stakeholders	Response
Federal Ministry of Environment (FMEEnv)	<ol style="list-style-type: none"> 1. Availability of new or emerging regulations that could be incorporated into the ESMF. 2. Environmentally sensitive areas or biodiversity hotspots that could be considered on the AGROW project. 	<ol style="list-style-type: none"> 1. Some of the notable new environmental regulations and policies include the Climate Change ACT 2021, NESREA Guideline for pollution and waste management. 2. The need to develop mitigation measure in order to ensure the protection of sensitive areas such as the national parks, forest reserves, riverine buffers were also discussed.

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<p>Federal Ministry of Agriculture & Food Security</p>	<ol style="list-style-type: none"> 1. What are the trending concerns on Genetically Modified Foods (GMO's) and strategies to address. 2. Mitigation measures of climate change on the agricultural value chain? 	<ol style="list-style-type: none"> 1. The Ministry affirmed the development reform due to the recent difficulty of farmers in replanting or regrowing GMO seeds. 2. The Ministry informed the Team of the existence of extension services and constant information dissemination, training and collaboration with NIMET And the Department of Agricultural Land and Climate Change Management Services (DALCCMS) for climate information support services.
<p>Ministry of Woman Affairs</p>	<ol style="list-style-type: none"> 1. What are the most pressing barriers that are preventing women from fully engaging in agriculture value chains. 2. How are women affected by climate change, land degradation or unsafe chemical use in agriculture and what solutions do they use and should be approved. 	<ol style="list-style-type: none"> 1. The Ministry of Women Affairs highlighted some of the several barriers militating the participation of women in the agricultural value chain as; limited access to land and tenure rights due to customary and patriarchal system (especially in the South East/South South of Nigeria), inadequate representation of women voice in the farmers' associations as well as marital/domestic responsibilities. 2. The Ministry stated that women farmers who are disproportionately affected by climate change, land degradation, and the use of unsafe chemicals etc adopts valuable indigenous knowledge and adaptation strategies to stem the impacts of climate change. However, the Ministry explained further that improvements can be made by strengthening the access to inputs, land rights, training, finance, and safer technologies in order to protect and also enhance national food.
<p>Federal Ministry of Labour</p>	<ol style="list-style-type: none"> 1. The key indicators of labour that should be included in the ESMF monitoring plan in order to effectively track labour and social performance effectively. 2. How will the Ministry ensure that contractors' staff can safely and effectively report grievances or labour violations? 	<ol style="list-style-type: none"> 1. The consulting team responded that the AGROW project will adopt a functioning monitoring plan and other environmental, Occupational, Health and Safety (OHS), worker grievance redress mechanism and gender inclusion clauses. 2. The consulting team stated that the AGROW project would ensure regular monitoring of projects and also ensure prompt receipt of feedback in order to in support the mitigation measures for emerging social or environmental risks.
<p>Department of Farm</p>	<ol style="list-style-type: none"> 1. How effective is the current 	<ol style="list-style-type: none"> 1. It was mentioned that the Government

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<p>Input and Support Service</p>	<p>distribution system in reaching small-holder farmers in rural and difficult terrains.</p> <p>2. Is there any available policy guiding fertilizer quality control in Nigeria?</p>	<p>has initiated the National Agricultural Growth Scheme – Agro-Pocket (NAGS-AP) and other subsidized input schemes which have been rolled out in some state.</p> <p>2. The Agency talked about the existence of the National Fertilizer Quality Control ACT 23 of 2019 including the National Fertilizer Quality Control Regulations 2020.</p>
<p>Remarks/ Commitment</p>	<p>All the stakeholders affirmed their verbal commitment during the meeting to cooperate with the AGROW project.</p>	



Plate 9. 1: FGD Meeting with the Federal Ministry of Agriculture & Food Security (FMA&FS)

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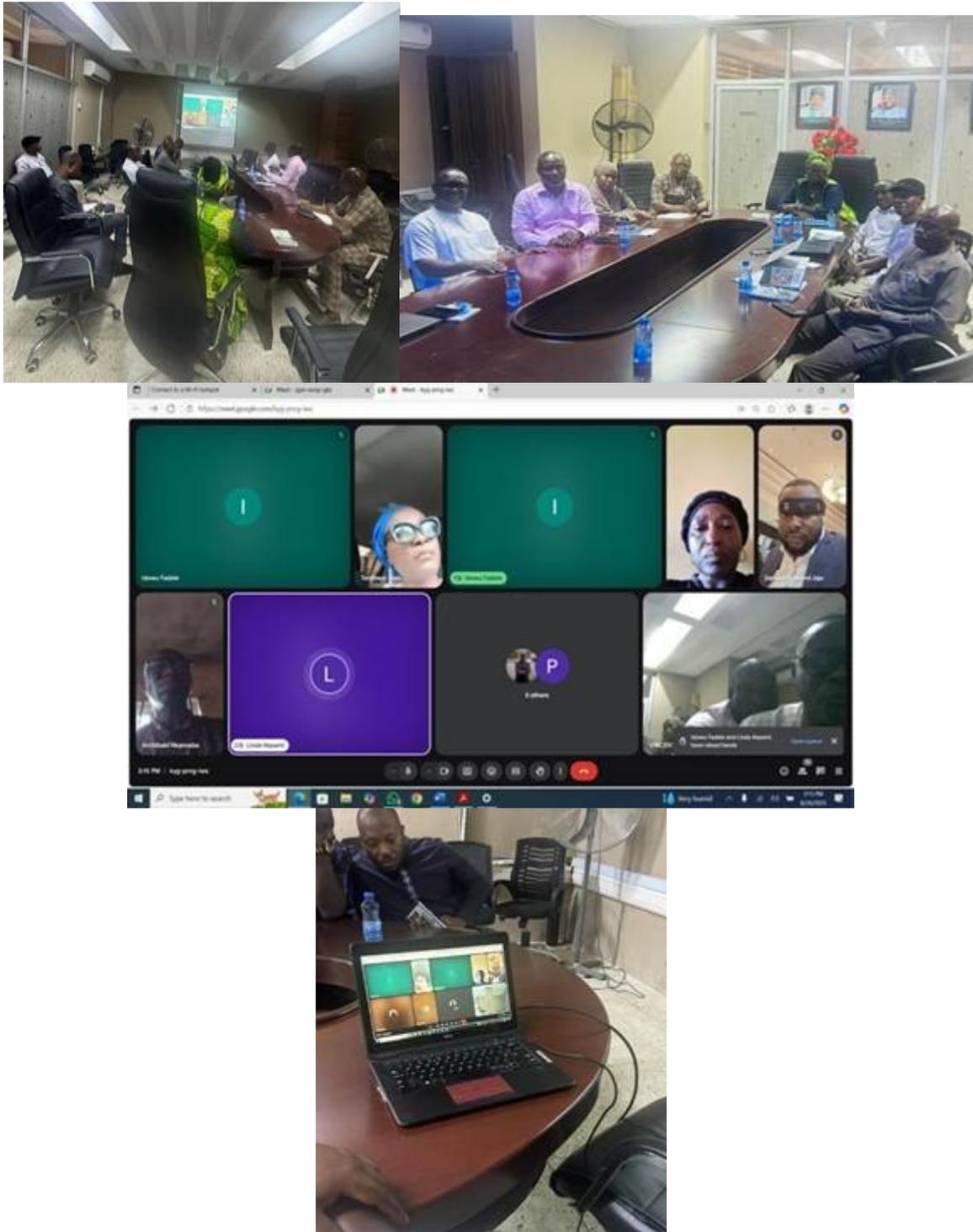


Plate 8. 2: Consultation (physical and online) with the Farm Input Support Services (FISS)

Chapter 9: Screening, Review and Approval Process

9.1 Introduction

The AGROW project employs a standardized process to ensure all subprojects are screened for environmental and social (E&S) risks before any funding is approved or civil works commence. This process ensures compliance with the World Bank Environmental and Social Framework (ESF) and Nigerian regulatory requirements. No AGROW investment may proceed to construction, land access, or procurement unless it has complied with this chapter.

9.2 Step 1: Environmental and Social Screening

Every subproject under AGROW must undergo a formal screening process to identify potential risks and determine the required management instruments.

9.2.1 Screening Trigger

All subprojects proposed under:

- Component 1 (infrastructure & agribusiness)
- Component 2 (extension & digital)
- Component 3 (land, seed, irrigation)
- Component 4 (coordination facilities)

Must be screened **before funding approval**.

9.2.2 Screening Tool

SPIU Environmental and Social Officers shall use the E&S Screening Form (Annex 11) to identify:

- Land acquisition or resettlement
- Biodiversity sensitivity
- Labor risks
- GBV / SEA-SH risk
- Security risk
- Pollution and waste risks
- Community health and safety issues

This applies to both public investments (Component 2) and private-sector-financed activities (Component 1).

9.2.3 Risk Classification

Table 9.1 present AGROW project risk categorization. Based on ESS1, subprojects are classified into one of four risk levels outlined below:

Table Chapter 9: Screening, Review and Approval Process.27: AGROW Project Risk Categorization

Risk Level	Meaning
Low	Minimal or no adverse E&S impacts
Moderate	Limited, site-specific, manageable impacts that can be mitigated through standard codes of practice.
Substantial	Impacts are mostly site-specific and manageable through known mitigation measures. Significant impacts requiring ESIA
High	Not eligible under AGROW. Subprojects with significant, diverse, and irreversible impacts

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The screening process produces a Screening Form, a Risk Memo, and a specific Instrument Plan which is entered into the Safeguards Information System (SIS).

9.3 Step 2: Scoping

For Moderate and Substantial Risk subprojects, the SPIU prepares a Scoping Report defining:

- Key risks and affected groups
- Applicable ESS
- Required instruments (ESMP, ESIA, RAP, IPMP, GBV Plan, etc.)
- Stakeholders to be consulted

Scoping is reviewed by:

- Federal Project Coordinating Unit (FPCU)
- State Environmental Protection Agency (SEPA)
- World Bank Task Team

9.4 Step 3: Preparation of ESIA / ESMP Instruments

Once categorized, the appropriate instruments must be prepared by the State Project Implementation Unit (SPIU) through qualified, independent consultants:

- **ESIA/ESMP:** Environmental and Social Impact Assessment and Management Plan for High and Substantial risk subprojects.
- **RAP:** Resettlement Action Plans required if land acquisition or displacement occurs (per ESS5).
- **LMP:** Labor Management Procedures, including a dedicated Worker GM.
- **IPMP:** Integrated Pest Management Plan for all agricultural interventions.
- **C-ESMP:** Site-specific management plans developed by the Contractor before mobilization.

9.5 Step 4: Review, Approval, and Disclosure

Civil works cannot begin until all required instruments are cleared and publicly disclosed.

9.5.1 The Review Process

- **Technical Review:** The Federal Project Management Unit (FPMU) and World Bank technical specialists review the draft instruments for quality and alignment with the ESF.
- **Regulatory Review:** For subprojects requiring an EIA certificate, the Federal Ministry of Environment (FMEnv) reviews the reports as per the EIA Act.

9.5.2 Approval and "No Objection"

- **World Bank Clearance:** Major contracts and high-risk E&S plans require a formal "**No Objection**" from the World Bank.
- **National Certification:** The FMEnv issues the final Environmental Impact Statement (EIS) once all regulatory conditions are met.

9.5.3 Disclosure Requirements

- All instruments must be disclosed locally (in relevant languages) and on the project website.
- Public displays are mandatory at the Local Government Council and SEPA offices to allow for community feedback.

9.6 Step 5: Integration into Contracts

E&S requirements are not separate from the contract; it must be embedded within it as outlined below:

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- **Bidding Documents:** Standard E&S clauses and the **Worker Code of Conduct** are to be attached to all bid packages.
- **Evaluation:** Safeguard compliance is a **Pass/Fail** item during technical evaluation.
- **Payment Ties:** Monthly progress payments to contractors shall be tied to the verified delivery of E&S reports and KPI compliance.

Approved ESMPs and mitigation measures shall be:

- Inserted into bidding documents
- Included in contracts
- Enforced by supervision engineers

Failure to comply may result in:

- Payment suspension
- Contract termination
- Remedial actions

9.7 Step 6: Construction and Operational Monitoring

The SPIU maintains daily oversight, while the FPCU consolidates national reports for the World Bank. Any serious incidents (e.g., fatalities or major spills) must be reported to the World Bank within 48 hours.

SPIU Environmental & Social Officers shall:

- Conduct site inspections
- Verify ESMP implementation
- Track grievances
- Monitor labor, GBV, biodiversity, and security risks

Quarterly E&S reports shall be submitted to:

- FPCU
- World Bank

9.8 Adaptive Management

If new risks emerge (e.g., insecurity, flooding, community conflict), SPIU must:

- Update ESMPs
- Notify the World Bank
- Implement corrective action plans

Chapter 6 Monitoring, Reporting, and Budget

10.1 Introduction

This chapter defines the framework for assessing and managing environmental and social (E&S) risks throughout the AGROW project life cycle. It ensures that all measures established in the Environmental and Social Commitment Plan (ESCP) and other site-specific instruments are effectively implemented and reported.

10.2 Institutional Arrangements for Monitoring

The Federal Ministry of Agriculture & Food Security (FMAFS) holds overall responsibility through its specialized units:

- **Federal Project Coordination Unit (PCU) E&S Unit:** Leads national compliance, consolidates state-level reports, and oversees the Grievance Mechanism (GM) and SEA/SH Action Plans.
- **State PIU E&S Officers:** Conduct site-level monitoring of Environmental and Social Management Plan (ESMP) implementation, contractor compliance, and state-level GM operations.
- **Contractors & Supervising Engineers:** Responsible for maintaining Occupational Health and Safety (OHS) logs, incident registers, and submitting monthly compliance reports.
- **Independent Third-Party Monitor (TPM):** Periodically verifies project performance and the effectiveness of the GM.

10.3 Monitoring Framework and Indicators

Monitoring is structured around core indicators aligned with World Bank Environmental and Social Standards (ESS1–10).

Core Performance Indicators

- **ESMF Implementation:** Percentage of subprojects screened and ESMPs disclosed before works begin.
- **Labor & OHS:** Number of reported OHS incidents and percentage of workers who have signed the Code of Conduct.
- **Grievance Redress:** Percentage of grievances acknowledged within 3 days and resolved within 30 days.
- **SEA/SH Management:** Number of cases referred to vetted service providers and completion of mandatory staff training.

10.4 Reporting Requirements

Regular reporting ensures transparency and allows for Adaptive Management.

Table Monitoring, Reporting, and Budget.28: Reporting Requirements

Report Type	Frequency	Responsibility	Main Content
Contractor Progress Report	Monthly	Contractor	Site safety logs, waste management, and labor statistics.
SPIU Monitoring Report	Quarterly	State PIU	Consolidated state compliance, GM status, and field visit findings.
FPCU Performance Report	Semi-Annually	Federal PCU	National progress against the ESCP and major risk trends.
Incident Notification	Within 24-48 Hours	Contractor / PIU	Fatalities, serious injuries, or major environmental spills.

10.5 Estimated Budget for ESMF Implementation

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The budget for ESMF implementation is integrated into **Component 4** (Project Coordination, Monitoring, and Evaluation). Table 10.2 present estimated budget for the ESMF Implementation.

Table Monitoring, Reporting, and Budget.29: ESMF Implementation Estimated Budget

Activity	Estimated Cost (USD)	Source of Funds
E&S Screening & Instrument Preparation	\$1,200,000	IDA Credit / State Counterpart
Capacity Building & Training (12 Modules)	\$850,000	IDA Credit
Stakeholder Engagement & GM Operations	\$600,000	IDA Credit
Independent Annual Audits & Third-Party Monitoring	\$450,000	IDA Credit
PPE & Emergency Response Kits	\$300,000	Contractor Budget
Total Estimated ESMF Budget	\$3,400,000	

10.6 Incident Notification and Investigation

Contractors must notify the **SPIU** within **24 hours** of any significant incident, including fatalities, major spills, or SEA/SH reports. A full root-cause investigation and corrective action plan must follow within **7 days**.

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Annex 1: Terms Of Reference (TOR)

PREPARATION OF ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK FOR NIGERIA SUSTAINABLE AGRICULTURE VALUE CHAINS FOR GROWTH PROJECT (AGROW).

1. Background

The World Bank is supporting the Federal Government of Nigeria through the Nigeria Sustainable Agriculture Value Chains for Growth (AGROW) Project. The AGROW project aims to foster sustainable growth and job creation across selected agricultural value chains in Nigeria. It is financed through Investment Project Financing (IPF) and implemented by the Federal Ministry of Agriculture and Food Security in collaboration with selected states. The project includes interventions in infrastructure, regulatory reform, institutional capacity building, and value chain-specific support.

The proposed project development objective of AGROW is to foster sustainable growth and job creation across selected agricultural value chains in Nigeria.

2. Project Description

AGROW project aims to address the critical challenges that affect competitiveness and resilience of agricultural value-chains, and thus stifle the prospects for value-added growth and job creation. In summary these key challenges include: (i) low institutional capacity and non-conducive policies that affect private sector (including farmers') participation in key value-chains; (ii) structural constraints that affect sector modernization and productivity and thus stifle private sector and farmers' returns and quality of jobs from agricultural value-chains; and (iii) poor integration of farmers to markets. The proposed project will therefore focus on interventions that directly or indirectly contribute towards Nigeria's agricultural sector modernization, productivity and value-added growth, including improved food and nutrition security in line with the country's Agriculture Promotion Policy (APP), National Agricultural Technology and Innovation Policy (NATIP). Nigeria's priorities as highlighted in these policy documents is to achieve self-sufficiency in key commodities, transform agriculture into a business-oriented sector, and ensure food security, while also promoting sustainable income and job growth.

3. Project Components

The proposed interventions are categorized under four main components:

Component 1: Policy and Regulatory Reforms

This component will aim to encourage states [and selected seed ecosystem players] to improve the policies and regulations that would enable access to quality seed, fertilizer and other inputs required to enhance productivity. Overall, this is meant to improve the business enabling environment for SMEs and large agribusiness firms and all key stakeholders (including farmers) operating in the selected key agricultural value-chains.

This component will focus on facilitating reforms and/or operationalization of the already enacted legislations in the following areas: (i) operationalization of the Seed Act of 2019 to ensure that it is effectively implemented; (ii) strengthening and deregulation of the fertilizer subsector through facilitating the implementation of the Fertilizer Control Act of 2019 by among others, fully de-regularizing the importation and domestic blending of fertilizers, while strengthening the public sector role for quality monitoring; (iii) supporting initiatives to render inter-state movement of commodities and goods efficient and streamlining regulations and policies for exports and imports; and (iv) operationalization and roll out of the Responsible and Inclusive Land-Intensive Agricultural Investments, including regulation aimed at improving investment on the land. The project will help to facilitate reform by reviewing and understanding the major stumbling blocks affecting the operationalization of the already approved legislations, including facilitating development of regulations and capacity building necessary to ensure the functionality of the institutions mandated to operationalize these legislations. The operation will also help to assess requirements and define steps needed for Nigeria to offer an enabling environment for compliance with international trade policies, for key commodities, such as cocoa, mentioned in the new EU Regulation 2023/1115 on deforestation-free products and the EU Directive on corporate sustainability due diligence (2024/1760). This includes adopting a list of “authorized” and “prohibited” agricultural activities (on-farm and off-farm) for young workers under 18 years as a tool to identify and monitor child protection and define a strategy for compliance with environmental and social standards requirements. This component will focus on facilitating reforms and/or operationalization of the already enacted legislations in the following areas: (i) operationalization of the Seed Act of 2019 to ensure that it is effectively implemented; (ii) strengthening and deregulation of the fertilizer subsector through facilitating the implementation of the Fertilizer Control Act of 2019 by among others, fully de-regularizing the importation and domestic blending of fertilizers, while strengthening the public sector role for quality monitoring; (iii) supporting initiatives to render inter-state movement of commodities and goods efficient and

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streamlining regulations and policies for exports and imports; and (iv) operationalization and roll out of the Responsible and Inclusive Land-Intensive Agricultural Investments, including regulation aimed at improving investment on the land. The project will help to facilitate reform by reviewing and understanding the major stumbling blocks affecting the operationalization of the already approved legislations, including facilitating development of regulations and capacity building necessary to ensure the functionality of the institutions mandated to operationalize these legislations. The operation will also help to assess requirements and define steps needed for Nigeria to offer an enabling environment for compliance with international trade policies, for key commodities, such as cocoa, mentioned in the new EU Regulation 2023/1115 on deforestation-free products and the EU Directive on corporate sustainability due diligence (2024/1760). This includes adopting a list of “authorized” and “prohibited” agricultural activities (on-farm and off-farm) for young workers under 18 years as a tool to identify and monitor child protection and define a strategy for compliance with environmental and social standards requirements.

Component 2: Public Investments and Provision of Technical Assistance for productivity enhancement

This will focus on public investments and technical assistance necessary to enable productivity growth along the selected value-chains. This will include: (i) enhance the capacity of research and technology transfer institutions to provide quality services; (ii) supporting irrigation development and providing last mile infrastructure in selected areas and states; (iii) promoting access to and adoption of climate smart technologies / farm extension and advisory services for identified value chains; (iv) strengthening land tenure security to spur investment on the land for productivity growth. This component will have three sub-components:

- Sub-Component 2.1: Institutional Capacity Strengthening
- Sub-Component 2.2: Support for Irrigation development and last mile infrastructure in selected states and areas
- Sub-Component 2.3: Strengthening land tenure security

Component 3: Promoting the productivity growth and market access for the selected value chains

The project will support the mobilization and strengthening of farmer cooperatives and facilitate the creation of productive partnerships between farmers (production) and private anchor agribusinesses and off-takers (market demand). This component will have three sub-components:

- Sub-component 3.1: Mobilization and strengthening farmers’ cooperatives
- Sub-Component 3.2: Promoting Access to and Adoption of Productivity-Enhancing Technologies for Farmer Cooperatives and Agribusinesses
- Sub-Component 3.3: Enhancing Market Access and Value Chain Integration

Component 4: Project Coordination, Monitoring and Evaluation

The project will, at both federal and state levels, support the establishment of relevant capacity to coordinate project implementation, oversee fiduciary functions, ensure implementation of environmental and social safeguard risk mitigation measures, and OHS requirements of the projects activities and undertake monitoring and evaluation including impact assessment and learning, as well as promoting citizen engagement to enhance community awareness about the project throughout the project cycle.

4.Risk rating: According to the World Bank’s Environmental and Social Review Summary (ESRS) The environmental risk rating at Concept (PCN) stage is “Substantial”, as the proposed project will finance the development of infrastructure such as rehabilitation of tertiary canal to support irrigation activities, maintenance and management of the irrigation facilities, development of last mile infrastructure necessary to connect producers to the market, construction of small-scale aggregation and processing centers, and storage facilities or warehouses structures and the capacity of the client to implement ESF

The World Bank’s standards that apply to activities being considered are:

- ESS1 Assessment and Management of Environmental and Social Risks and Impacts
- ESS2 Labor and Working Conditions
- ESS3 Resource Efficiency and Pollution Prevention and Management
- ESS4 Community Health and Safety
- ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

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- ESS8 Cultural Heritage
- **ESS9 - Financial Intermediaries**
- ESS10 Stakeholder Engagement and Information Disclosure

5. Rationale and Objective of the Consultancy Services

The project by design includes the following: activities the development of infrastructure such as rehabilitation of tertiary canal to support irrigation activities, maintenance and management of the irrigation facilities, development of last mile infrastructure necessary to connect producers to the market, construction of small-scale aggregation and processing centers, and storage facilities or warehouses structures. Based on the initial screening, there are various environment, health and safety risks and impacts that could result from the project activities which include (i) inappropriate use and disposal agrochemicals including pesticides as well as agricultural research laboratory chemicals; (ii) risks and impacts on water quality as well as dust, noise, air emissions, (iii) occupational health and safety of workers; and (iv) water and biodiversity management due to rehabilitation of tertiary canals. (v) rehabilitation of infrastructure such as tertiary canals and irrigation schemes can contribute to environmental pollution such as air pollution, construction waste, and water pollution. (vi) unsuitable land management techniques.

The project will be implemented in the existing agricultural scheme and hence will not lead to conversion of natural habitats, considering the nature of the activities to be given the exact location and magnitude of these impacts are unknown at stage, an Environmental and Social Management framework will need to be prepared.

The objective of this assignment is to recruit a consultant(s) to develop an Environmental and social management framework (ESMF). An ESMF is an instrument that examines the risks and impacts when a project consists of a program and/or series of subprojects, and the risks and impacts cannot be determined until the program or subproject details have been identified. The ESMF sets out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts. It contains the institutional and legal framework, measures and plans to reduce, mitigate and/or offset adverse risks and impacts, guidance for stakeholder engagement and grievance redress as well as provisions for estimating and budgeting the costs of such measures, and information on the agency or agencies responsible for addressing project risks and impacts, including on its capacity to manage environmental and social risks and impacts. It includes adequate information on the area in which subprojects are expected to be sited, including any potential environmental and social vulnerabilities of the area; and on the potential impacts that may occur and mitigation measures that might be expected to be used. Finally, an action plan for implementation is proposed.

6. The specific objectives of this ESMF are:

- (i) To describe the project and its institutional arrangement.
- (ii) To describe the physical, biophysical and social context as well as the environmental and social issues linked to the project area;
- (iii) To present baseline data on the environmental and socio-economic aspects which may be impacted by the project;
- (iv) To identify potential environmental and social policies, legal and institutional framework pertaining to the project;
- (v) To assess the potential environmental and social impacts of the project, whether positive or negative, and propose mitigation measures which will effectively address the negative impacts;
- (vi) To present procedures for stakeholder engagement and grievance mechanism;
- (vii) To establish clear directives and methodologies for the environmental and social screening of sub-projects to be financed by the project;
- (viii) To define the content of Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs), and other environmental and social plans (e.g. Water Resources Management Plan including water balance, Biodiversity Management Plans, and Waste Management Plans) as might be needed for specific sub-projects;
- (ix) To assess the need to reinforce capacity of stakeholders (government agencies, NGOs, etc.) involved in the project;
- (x) To propose a monitoring and evaluation system for the project and sub-projects;
- (xi) To propose a budget and timeline for the ESMF implementation.

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To assist the Project Management Unit in the recruitment of qualified specialists to carry out screening and oversee environmental and social assessments as they are conducted.

7.Environmental and Social Screening and Scoping

The initial stage of the consultant's intervention will be the scoping of the project's field of influence, activities and impacts that will have to be studied in the ESMF.

- a. The consultant will need to undertake initial scoping activities in order to understand the project's field of influence, activities and impacts that will be outlined in the ESMF. Such scoping exercises should be done as consultative and participatory manner as possible, involving a range of stakeholders at each level of the project.
- b. The consultant should provide maps to illustrate the general setting of the project-related development sites, as well as surrounding areas, which can be potentially affected, including locations of major surface waters, roads, parks and town centers if available. Information on existing land use patterns, including residential, agriculture, grazing lands socioeconomic and cultural environment (e.g. community structure, employment and labour market, sources and distribution of income, cultural properties such as historically and archeologically significant sites, shrines and other sites considered sacred by local populations; customs- and planned development activities) should be included.
- c. The consultant should identify and describe all significant potential changes that may occur because of the project. These would encompass environmental and social impacts, both positive and adverse, because of project interventions- such as involuntary resettlement, social conflicts and disturbance, or environmental risks such as threats to land and natural resources, biodiversity, critical and natural habitats. It is important to differentiate between short, medium and long-term project intervention. The relevant baseline data for the analysis of impact should be identified and outlined. Also, it is important to assess the environmental awareness and commitment of implementing agencies.
- d. Specific types of projects and associated environmental and social impacts that might require separate assessments in relation to location, project size, and other site-specific factors need to be identified. The consultant should clearly set out the type of information that the project teams will require to assess impacts of subprojects and/or to develop environmental and social management plans.
- e. The consultant will propose options for the creation of an environmental and social screening, evaluating, and supervising mechanism within the project management unit, which will ensure that funded projects/sub-projects are environmentally sound and sustainable and that any adverse environmental consequences and social impacts and risks are recognized early in the project cycle.
- f. This phase of the work is expected to develop among others an environmental and social screening and reporting section using a simple environmental and social criteria checklist format to be used for sub-projects. The checklist will be accompanied by guidelines for mitigation and integrated into the overall framework for site selection and other physical works to be undertaken.

8. Analysis of Environmental and Social Risks and Impacts, and Proposed Mitigation Measures

Identify specific types of projects and associated environmental and social impacts, issues and risks that might require separate environmental and social assessment in relation to location, project size, and other site-specific factors. The assessment will be proportionate to the potential risks and impacts of the project, and will assess, in an integrated way, all relevant direct, indirect and cumulative environmental and social risks and impacts throughout the project life cycle, including those specifically identified in ESSs2–10. The ESMF should include proposed mitigation measures for the identified risks and impacts for each component and phase of the project (preparation, implementation, and operations).

For sub-projects, which may have transboundary impacts such as those in the Benue River and potentially others, the consultant shall include guidance for assessing such impacts in the framework. Because all sub-projects are likely to have a high-water demand that have potentially significant adverse impacts on communities, other users, or the environment, the consultant shall provide guidance for developing detailed water balances that will be maintained, monitored and reported periodically. Guidance to assess the potential cumulative impacts of water use upon communities, other users and the environment will be provided as well as methods to identify and implement appropriate mitigation measures.

9. Environmental Risks and Impacts

Environment

The proposed project will finance the development of infrastructure such as rehabilitation of tertiary canal to support irrigation activities, maintenance and management of the irrigation facilities, development of last mile infrastructure

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necessary to connect producers to the market, construction of small-scale aggregation and processing centers, and storage facilities or warehouses structures. There are various environment, health and safety risks and impacts that could result from the project activities which include (i) inappropriate use and disposal agrochemicals including pesticides as well as agricultural research laboratory chemicals; (ii) risks and impacts on water quality as well as dust, noise, air emissions, (iii) occupational health and safety of workers; and (iv) water and biodiversity management due to rehabilitation of tertiary canals. (v) rehabilitation of infrastructure such as tertiary canals and irrigation schemes can contribute to environmental pollution such as air pollution, construction waste, and water pollution. (vi) unsuitable land management techniques,

Social Impacts

The social benefits of the project are expected to be significant as it aims to enhance productivity, reduce post-harvest losses and improve food security through increased adoption of yield-enhancing technologies and climate-smart agricultural practices. Subcomponent 2.1 will focus on improving the capacity of the public institutions with the mandate to provide critical services along the selected value-chains and related agribusiness ecosystem. Subcomponent 2.2 aims to establish the last-mile infrastructure necessary to connect producers to the market and key agribusiness service providers through the development of rural feeder roads, utilization of existing irrigation infrastructure by providing water to farmers through the construction of tertiary canals, storage facilities, and processing centers to help farmers achieve economies of scale and reduce transaction costs. Despite these benefits, AGROW also come with some social risks particularly from component 1, 2 and 3 activities that are expected to be temporary and less severe, with readily available mitigatory measures. These include temporary land acquisition, potential losses of crops, agricultural products and loss of harvest, minor labor influx, associated with subcomponent 2.2, impacts on the livelihood of smallholder farmers transitioning to more modern agricultural practices, potential impacts on cultural heritage, temporary restriction of access to agricultural land during construction of tertiary canals, , community health risks due to the use of agrochemicals, risk of exclusion from uneven distribution of project benefits including risks of exclusion of other vulnerable groups in terms of access to quality seeds and fertilizers, and child labor risks due to high prevalence and weak enforcement of existing laws. Other social risks associated with component 2.3 include risk of inequality for those who cannot afford to formalize their land and risks of dispute resulting from conflicting ownership etc. Additionally, there could be risks of exclusion of vulnerable people in the consultation process, limited access to GM and risks of SEA/SH.

10. Baseline Data

The consultant will describe and give adequate information on the current environmental conditions in the participating states and socio-economic and cultural characteristics in project areas.

The following elements will be surveyed and documented:

- a. Physical environment: geology; topography; soils; climate and meteorology; ambient air quality; hydrology and hydrogeology;
- b. Biological environment: flora; fauna; rare or endangered species in line with IUCN Red List of Threatened Species; natural and critical habitats, including parks and other protected areas, significant natural sites, etc.;
- c. Socio-economic and cultural settings in project area: cultural and socioeconomic characteristics (demography, economic activities, production systems, health and nutrition, education and health infrastructures, vulnerable groups, land use, tenure and titling, etc.).

10. Environmental and Social Policy and Regulatory Framework

The ESMF will set out and review the existing environmental and social laws, policies and mechanism that are currently in place at each level of government as well as relevant World Bank policies, standards and guidelines and processes which shall include but is not limited to the following:

- Review of relevant Nigerian laws, regulations and procedures.
- Review of ESMFs prepared for SPIN Project and other recent World Bank projects in Nigeria (e.g., Acresal, SURWASH, TRIMING etc.);
- Review of ESMFs prepared for other World Bank Irrigation and Agro projects in other parts of the World.

The consultant will analyse the existing environmental and social policies, laws, conventions and protocols on environmental and social impact assessment. In addition, the consultant will analyse sub-sector specific policies, laws, regulations and directives with potential for environmental and social implications. In particular, the adequacy of the sub-sectoral development and investment planning process, should be reviewed in terms of objectives, methodology and

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procedures for review and approval of plans and projects. The Framework should assess whether environmental and social issues are sufficiently identified and covered under current procedures and whether there are gaps between environmental and social World Bank policies, standards and guidelines and local policies, laws and regulations.

11. Institutional Framework

The consultant shall propose means for strengthening of implementing institutions to be able to predict and control the environmental and social impacts and risks of the project and its sub-components. To this end, the ESMF will address institutional tasks and cover every stage of the project process (from the initiation and reviews to the monitoring of the implementation of environmental and social mitigation plans) and the training and equipment needs to adequately monitor environmental and social impacts.

The ESMF should also assess the capacity of the implementing agency to manage the preparation, implementation and supervision of comprehensive environmental and social assessment of the proposed project and sub-projects. The ESMF should also examine the need for in-house environmental and social assessment and management capacity with the responsibility to adequately supervise and monitor sub-project implementation.

12. Training Needs

Based on the screening study's findings, the consultant should describe how the sensitization meetings and launching workshops can bring out environmental and social issues and considerations of the proposed sub-projects; develop an ESIA and ESMP training program to ensure adequate monitoring and enforcement of environmental and social standards.

13. Public Consultation and Grievance Mechanism

Public consultation is a vital part of this environmental and social assessment process since this project is classified as "High" risk. Since the ESMF is conducted before most of the sub-project decisions are made, the consultant shall discuss and interact with national NGOs, community opinion leaders, scientific experts, relevant government agencies and the private sector.

Apart from the consultations undertaken during the screening phase, the consult shall propose stakeholder engagement procedures. These shall describe how communications between the Implementing Agency and the affected communities and other stakeholders would be achieved throughout the project cycle. Consultations are used as a tool to inform and educate stakeholders about the proposed actions which are going to impact them both before and after the development decisions were made. The involvement of the various stakeholders ensure that the affected population and other stakeholders are informed, consulted and allowed to participate at various stages of project preparation, implementation, and operations.

A Grievance Mechanism shall be developed for potential use by external stakeholders to address the matters related to E&S issues. A Grievance Mechanism (GM) to uphold the project's social and environmental standards performance is designed to address concerns and complaints promptly and transparently with no impacts (cost, discrimination) for any issue raised by project affected people (PAPs). The Grievance Mechanisms will include both complaints and grievances (hereinafter referred to only as 'grievances'). The GM works within existing legal and cultural frameworks, providing an additional opportunity to resolve grievances at the local, project level.

The key objectives of the GM are:

- Record, categorize and prioritize the grievances.
- Settle the grievances (and inform those stakeholders of the solutions)
- Forward any unresolved cases to the relevant authority.

14. Monitoring and Evaluation

Monitoring and evaluation are meant to check whether the adverse environmental and social impacts identified are being adequately mitigated and that the proposed mitigation plan is resulting in achieving desired results. Monitoring and evaluation will be done at two levels: overall project level monitoring of ESMF implementation and sub-project level monitoring of ESMP implementation. This, essentially, involves cross-checking the implementation of the ESMF and sub-project ESMPs as well as monitoring the environmental social quality through suitable indicators in the specific sub-project locations during the preparation, implementation and operations phases of the project. The consultant will propose the outline of a monitoring scheme that encompasses, among others water use and soil quality, vegetative cover, watershed dynamics, hydropower, energy, dam operation and irrigation operation.

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15. Other Tasks

The consultant will identify environmental social action plans needed to ensure compliance of the project with the World Bank ESSs such as Water Resources Management Plans, Waste Management Plans, and Labor Management Plans. The consultant shall provide procedures and guidance to develop each of the plan.

16. Qualification of Consultant

The service of consultant is needed for the preparation of the ESMF should be familiar with World Bank Environmental and Social Framework and Nigerian Environmental laws and guidelines. The consulting firm should have been involved in the drafting of a satisfactory ESMF for the World Bank. The firm should have participated in similar studies in Nigeria or other countries and have robust knowledge of institutional and environmental arrangements in Nigeria. Preference will be given to firm with experience with projects of similar scale in the irrigation and hydropower field.

The team composition should include three specialists are needed: a team leader, an environmental, and a social specialist. The team leader should have at least a master's degree in environmental management, while the second of the candidates should have at least a master's degree in environmental management or environmental-related training and 10 years of relevant experience, and the other one should have a Master's degree in social sciences or social-related training and 10 years of experience.

17. Reporting requirements

The consultants will work in close coordination with World Bank Task Team for the project and the SPIN PMU. The copies of report from the consultant shall be concurrently submitted to the TRIMING PMU for onward delivery to the Bank for review and approval.

The key output of the services is an ESMF based on the above scope of work which are to be included in the consultant's submission by end of the sixteen (16) weeks period. The following report shall be submitted through TRIMING PMU for the review and approval in a manner stipulated below:

- i. Inception report (that will include the workplan and table of contents of the final report) in five (5) hard copies and one (1) electronic copy within two (2) weeks from commencement date.
- ii. Scoping Report that will summarize the results of discussions with experts and stakeholders and outlining the topics to be treated in the Draft final report, within four (4) weeks of the commencement date.
- iii. Draft Final report in five (5) hard copies and one (1) electronic copy within six (6) weeks from commencement date. On submission of the draft report, the client shall be allowed two (2) weeks to review the draft and compile comments.
- iv. Final report in ten (10) hard copies and one (1) electronic copy with comments incorporated within sixteen (16) weeks from commencement date.

Annex 2: Approach and Methodology of ESMF Preparation

The preparation of this Environmental and Social Management Framework (ESMF) for the AGROW Project was guided by a structured and participatory approach consistent with the World Bank Environmental and Social Framework (ESF), relevant Federal and State environmental regulations, and global best practices. The methodology integrated both desk-based reviews and field-based consultations, ensuring that environmental and social considerations were adequately identified, analyzed, and embedded into project design.

The overall approach adopted for the preparation of this ESMF is outlined below:

1.4.1 Step 1: Review of Relevant Literature and Secondary Data

A comprehensive desk review was conducted to understand the project context, policy landscape, and baseline environmental and social conditions. This involved reviewing:

- National policies, legal, regulatory, and institutional frameworks relevant to environmental and social management;
- Existing environmental and social safeguard instruments for similar projects (e.g., RAAMP, ACRReSAL, FADAMA, ANRIN, and AGILE);
- World Bank Environmental and Social Standards (ESS1–ESS10) and Environmental, Health, and Safety Guidelines (EHSGs);
- AGROW Project preparatory documents such as the Project Appraisal Document (PAD), Project Concept Note (PCN), Environmental and Social Commitment Plan (ESCP), Stakeholder Engagement Plan (SEP), and Concept Environmental and Social Review Summary (ESRS).

This review provided insight into the project’s potential risks, mitigation requirements, and institutional readiness for effective E&S management.

1.4.2 Step 2: Stakeholder Identification and Consultation

Consultation with stakeholders remains a key component in the preparation of any Environmental and Social Management Framework (ESMF). For the AGROW Project, stakeholder consultations were conducted with relevant government agencies, local community representatives, farmers’ associations, women and youth groups, and other key actors who could be identified at this stage.

These engagements provided valuable insights into potential environmental and social risks, community priorities, and feasible mitigation measures to ensure project sustainability. The outcomes of these consultations—including key concerns raised and proposed response mechanisms—are detailed in Section 7.0: Stakeholder Engagement and Consultation Process, while the summary of consultation records and attendance lists are presented in Annex 6 of this report.

Stakeholder engagement was undertaken at both federal and state levels to gather information and understand local contexts, needs, and potential risks. Consultations included key institutions such as:

- Federal Ministry of Agriculture and Food Security (FMAFS)
- Federal Ministry of Environment (FMEnv)
- National Environmental Standards and Regulations Enforcement Agency (NESREA)
- Federal Project Management Unit (FPMU)/FPMUFPCU
- State Ministries of Agriculture, Environment, Rural Development, and Works
- Community representatives, traditional rulers, women and youth groups

The process was guided by the Stakeholder Engagement Plan (SEP) and used structured questionnaires (Annex 16) to capture both qualitative and quantitative data.

1.4.3 Step 3: Baseline Data Collection and Analysis

Environmental and social baseline data were compiled using a combination of primary field observations and secondary sources from national and state agencies, previous studies, and global datasets (e.g., FAO, NBS, FMEnv, and World Bank data).

Key parameters analyzed included:

- Biophysical environment (climate, topography, soil, hydrology, vegetation, and biodiversity)
- Socioeconomic characteristics (demographics, livelihoods, land use, gender dynamics, and vulnerability)
- Institutional and governance frameworks related to E&S management.

The data helped identify sensitive environmental zones, potential areas of impact, and opportunities for sustainable agricultural development under AGROW.

1.4.4 Step 4: Identification and Assessment of Potential Risks and Impacts

The potential environmental and social risks and impacts associated with AGROW interventions were identified and analyzed across all project phases—pre-construction, construction, and operation/maintenance. This analysis was guided by ESS1 (Assessment and Management of Environmental and Social Risks and Impacts) and employed a risk-screening matrix to classify risks based on their probability, magnitude, reversibility, and sensitivity of the receiving environment. Findings informed the design of appropriate mitigation measures and management strategies.

5.2 Impact Assessment Methodology

Step 1: Impact Identification and Categorization

Identify potential environmental, social, and occupational health and safety (OHS) impacts across all project phases (pre-construction, construction, and operation). Categorize impacts as beneficial or adverse, grouped under Environmental, Social, or OHS domains. Beneficial impacts will be enhanced through strict monitoring against the PDO. Adverse impacts will be assessed using the methodology described below.

Step 2: Likelihood Rating

Assign a probability score (1–5) based on the likelihood of occurrence:

- 5: Very High (Frequent)
- 4: High (Occasional)
- 3: Medium (Seldom)
- 2: Low (Rare)
- 1: Very Low (Almost impossible)

Step 3: Consequence Rating

Rate the severity of impact (1–5):

- 5: Severe (Irreversible/catastrophic)
- 4: Major (Significant, long-term)
- 3: Moderate (Medium-term)
- 2: Minor (Short-term)
- 1: Negligible (Very limited effect)

Step 4: Significance Rating

Calculate significance using:

$$\text{Final Score} = (\text{Likelihood} \times \text{Consequence}) \times 4 \text{ Interpretation:}$$

75–100: Very High (Critical mitigation required)

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50–74: High (Substantial mitigation needed)

25–49: Moderate (Moderate mitigation required)

0–24: Low (Minimal or no mitigation)

Step 5: Impact Assessment Matrix (Sample)

Impact	Likelihood (L)	Consequence (C)	Final Score	Band
Biodiversity loss	5	5	100	Very High
Water quality	4	3	48	Moderate
Air quality (dust)	2	2	16	Low
Noise disturbance	5	3	60	High

1.4.5 Step 5: Development of the ESMF Instruments

Based on the findings of the assessment, the ESMF was developed to provide a strategic framework for managing potential E&S impacts of all subprojects. This includes:

- Environmental and Social Screening procedures
- Institutional arrangements and capacity requirements
- Generic Environmental and Social Management Plan (ESMP)
- Monitoring and reporting frameworks
- Grievance Mechanism (GM)
- Budget estimates for E&S implementation

Guidance for integrating environmental and social clauses into bidding documents and contracts.

1.4.6 Step 6: Validation and Disclosure

The draft ESMF was reviewed and validated through multi-stakeholder consultations with representatives from FPMU, MDAs, and the World Bank. Feedback received was incorporated into the final report. The approved ESMF will be disclosed publicly by both the Federal Ministry of Agriculture and Food Security (FMAFS) and the World Bank in line with ESS10 requirements for transparency and accessibility.

Appendix 2.1: Attendance Sheet of Stakeholders' Consultations

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Attendance Sheet for Focus Group Discussion (FGD) of the Environmental and Social Management Framework (ESMF) for Nigeria Sustainable Agriculture Value Chains for Growth (AGROW) Project

Name of MDA: Farm Input Support Services (FISS) Address: Central Area, Abuja
 Name of Focus Group: _____ Date: 26/08/25

S/N	Name	Position	Phone No.	Signature
1	ABANA WAZIRI ABBA	DIRECTOR	08091239412	
2	IGOH, JANEI Okunribido	D.I	08086050333	
3	UWAJE, IFEMMI. M.	AD.	08024466517	
4	Joshua H-Samasi	AD	08065289673	
5	Oke Sunday	CAU	08034303009	
6	Sy. Eze Nnamaka M	C/E	08061315092	
7	George Ayuba Moid	CAO	08173713447	
8	ONYENZE BRIGHT	PPD	07044465558	
9	WILLIAMS KMADE	CAO	08033163205	
10	Taja Samuel Rowland	Asst. Chief Agric. Off.	08038159373	
11	EUBI WILLIAMS N.	AD	08035979289	
12	Olunsawe David	Geo-Solution Provider	08028208089	
13	Ayan Atobami. F	Consultant	080	
14	Mrs Perimyo Abo	South West Coordinator		
15	Mrs. Dorothy Arubi	N/W Zonal Director for FIMAF		
16	Nkonneke Archibad	South East	08038792437	
17	Vincent Okonkwo	Consultant	08080986336	
	Kingsley Madumese			

Attendance Sheet for Focus Group Discussion (FGD) of the Environmental and Social Management Framework (ESMF) for Nigeria Sustainable Agriculture Value Chains for Growth (AGROW) Project

FISS ATTENDANCE SHEET

22-08-2023

(AGROW)

S/N	NAME	DESIGNATION	ORGANIZATION	TEL. NO.	E-MAIL	SIGNATURE
01	ADANA WAZIRI ABBA	DIRECTOR (FD)	FMAFS	08091239412	wazirabba@gmail.com	
02	Atoni A. Adeniji - K	Consultant	Crosscutting Facility	08029651201	k.adeniji@fmafs.com	
03	Vijent Okonkwo	Consultant	✓	07080986336	Vijentokonkwo@gmail.com	
04	Stephen Tsado	Consultant	IC, SEP & RPF	08100155605	stephensado@gmail.com	
05	Joshua H. Samsi	AD (IFCL)	FMAFS / FISS	08065269673	samsi0220@gmail.com	
06	ISA, Umata Akintu	A-D (ASU)	FISS, FMAFS	08038794542	umataakintu@gmail.com	
07	EARL WILLIAMS N.	AD (OFBDAP)	FISS, FMAFS	08035975489	earlwilliams@gmail.com	
08						
09	Oke Sunday	Chief Agric Officer	FISS, FMAFS	08034303009	sunokent@gmail.com	
10	ISA					
11	OLYMPIE BRIGHT	Pro	FISS / FMAFS	07044655566	olympiebright@gmail.com	
12						
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14						
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People Information Chat Tools

IN-CALL

-  **Ayobami Kabeera (You)**
Meeting host
-  **Aminada Dennis**  
-  **Archibald Nkannebe**  
-  **Dorothy Aribi**  
-  **George Ayuba**  
-  **Idowu Fadele**  
-  **Idowu Fadele**  
-  **Linda Akpami**  
-  **P.O Ajiboye**  
-  **Samuel Rowland Jaja**  
-  **Temitayo Alao**  
-  **Umar Abdullahi Gamawa**  
-  **Uyobong Uko**  
-  **VINCENT OKONKWO**

Meeting overlay: You   Linda  +12

Nigeria Sustainable Agriculture Value Chains for Growth (AGROW) Project



Nigeria Sustainable Agriculture Value Chains for Growth (AGROW) Project
Federal Ministry of Agriculture and Food Security

Stakeholders Workshop on Discussion of Environmental and Social Frameworks for the AGROW Project (Environmental and Social Management Framework, Resettlement Policy Framework, Stakeholders Engagement Plan, Integrated Pest Management Plan and Labor Management Plan).

ATTENDANCE LIST

Date: 9 October 2025 Venue: Tafawa Balewa Hall, Nicon Luxury Hotel, CBD, Abuja.

S/N	Name	Designation	Organisation	Email	Phone Number	Signature
1	Mangum Adesina Rep. NPC LPRES	National Social Investment Specialist	LPRES	mangumad@fmafs.gov.ng	08035683358	<i>[Signature]</i>
2	Damitale Owati Rep. ESF	Ecospecialist	Geo Solution	damitale@gmail.com	08102370151	<i>[Signature]</i>
3	Vincent Okonkwo	IMPT LMP Consultant	Firm Accounting Consulting Ltd	Vincentokonkwo@gmail.com	0802078556	<i>[Signature]</i>
4	Edidiong E. Udo	PSO	FMEW/EA/Dept	edidiongnyitokwu@gmail.com	07034364503	<i>[Signature]</i>
5	Idio, Dimanne	PSO	FMEW/EA/DEPT	dimanneidio@gmail.com	08039162059	<i>[Signature]</i>
6	Ade Adedeyi	member	NIC Soybean MS	dahdot2@gmail.com	08035956705	<i>[Signature]</i>
7	Mahid Awwal Saiki	ACSO	FMEW/EA/DEPT	juasaw@gmail.com	08069225792	<i>[Signature]</i>
8	Izuakor C. Femi	NOS	ATASP-1	izuakor_2005@yahoo.com	08066883239	<i>[Signature]</i>
9	Dr. Aisha Aliyu	Director	Fed. Min. of Agric. & Food	aishadapo@smail.com	08055118665	<i>[Signature]</i>
10	Iyoh Janet O	D. Director	FCS/FMS	olyjah007@gmail.com	0803605538	<i>[Signature]</i>

Nigeria Sustainable Agriculture Value Chains for Growth (AGROW) Project

Federal Ministry of Agriculture & Food Security (FMAFS) Nigeria Sustainable Agriculture Value Chains for Growth (AGROW) Project Federal Ministry of Agriculture and Food Security THE WORLD BANK

Stakeholders Workshop on Discussion of Environmental and Social Frameworks for the AGROW Project (Environmental and Social Management Framework, Resettlement Policy Framework, Stakeholders Engagement Plan, Integrated Pest Management Plan and Labor Management Plan.)

ATTENDANCE LIST

Date: 9 October 2025 Venue: Tafawa Balewa Hall; Nicon Luxury Hotel, CBD, Abuja.

S/N	Name	Designation	Organisation	Email	Phone Number	Signature
1.	Muigani N. Zerto	CAD	FWS/FMAFS	muigani.zerto@gmail.com	08060587817	
2	Okwesiri Benjamin	Dep. Director Project coord.	FMAFS, Ofesse project	okwesiri.benjamin@fmafs.gov.ng	08038979148	
3	Umar A. Gama	Consultant		umar.gama@agrow.gov.ng	07033949125	
4	Ikanfẹ Monday	field officer	ICRAF	ikanfemkande@gmail.com	08065056983	

Appendix 2.2: Stakeholders' Engagement

MDA	Federal Ministry of Environment (FMEnv.)
Date of Consultation	20 th of August, 2025
Venue:	Federal Ministry of Environment (FMEnv)
Language(s) of Communication	English
Name of Department	Environmental Assessment
Introduction	The AGROW project was introduced to the Ministry taking into cognizance the role of the Ministry as the apex environmental regulatory authority in Nigeria. Thus, the FMEnv is a key stakeholder in order to ensure the ESMF aligns with Nigeria's environmental laws, strategies on climate change and sustainability goals.
Concerns Raised	Response
1. Availability of new or emerging regulations that could be incorporated into the ESMF. 2. Major environmental and social risks that have	1. Some of the notable new environmental regulations and policies include the Climate Change ACT 2021, NESREA Guideline for pollution

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<p>been identified by the FMEnv on similar projects.</p> <p>3. Environmentally sensitive areas or biodiversity hotspots that could be considered on the AGROW project.</p> <p>4. Some of the identified environmental risks discussed were the soil degradation, water resource depletion, agrochemical contamination, improper pesticide and fertilizer handling and usage and the social risk such as land tenure dispute, gender related issues</p>	<p>and waste management.</p> <p>2.The Ministry informed the team of the existence of a monitoring department which monitors the compliance of projects to statutory standards.</p> <p>3. The need to develop mitigation measure in order to ensure the protection of sensitive areas such as the national parks, forest reserves, riverine buffers were also discussed.</p> <p>4. The FMEnv affirmed that monitoring department is periodically carrying out its responsibilities across the country.</p>
Remarks/Commitment	The FMEnv affirmed its commitment to supporting the project.

MDA	Federal Ministry of Agriculture & Food Security (FMA&FS)	
Date of Consultation	20 th of August, 2025	
Language(s) of Communication	English	
Venue	Ministry of Agriculture & Food Security	
Introduction	The essence of the proposed AGROW project was explained to the team.	
Concerns Raised	Response	
<p>1. Trending concerns on Genetically Modified Foods (GMO's) and strategies to address.</p> <p>2. Barriers preventing some farmers from engaging in large-scale farming.</p> <p>3. Mitigation measures of climate change on the agricultural value chain?</p> <p>4. Strategies adopted by the Ministry in intervening in community and farm displacements.</p>	<p>1. The Ministry affirmed the development reform due to the recent difficulty of farmers in replanting or regrowing GMO seeds.</p> <p>2. The existence of different support programs to improve access to credit, land tenure, security as well as the drive at upscaling infrastructural support as well as programs to support acquisition of mechanized and processing equipment.</p> <p>3. The Ministry informed the Team of the existence of extension services and constant information dissemination, training and collaboration with NIMET and the Department of Agricultural Land and Climate Change Management Services (DALCCMS) for climate information support services.</p> <p>4. The Federal Ministry of Agriculture and Food Security informed the Team on the various efforts at intervening in issues of displacement through the adoption of preventive planning (safeguards), payment of compensation and resettlement, emergency relief, and livelihood restoration, through collaboration with other agencies.</p>	
Remarks/Commitment	The Ministry affirmed its support towards the AGROW project.	

MDA	Federal Ministry of Women Affairs
Date of Consultation	21 st of August, 2025
Venue	Federal Ministry of Woman Affairs
Language(s) of Communication	English
Name of Department	Department of Gender Affairs
Introduction	The essence of the AGROW project was discussed with the stakeholders including the efforts of the Ministry at addressing gender inclusivity, women empowerment and protection including the more insights on the development of an Environmental and Social Management Framework (ESMF) for the AGROW project.
Concerns Raised	Response
<ol style="list-style-type: none"> 1. Most pressing barriers that are preventing women from fully engaging in agriculture value chains. 2. How are women affected by climate change, land degradation or unsafe chemical use in agriculture and what solutions do they use and should be approved upon. 3. What are the capacity building and partnership that should be prioritized on the project. 4. Available platforms for women’s voices and representation. 	<ol style="list-style-type: none"> 1. The Ministry of Women Affairs highlighted some of the several barriers militating the participation of women in the agricultural value chain as; limited access to land and tenure rights due to customary and patriarchal system (especially in the South East/South South of Nigeria), inadequate representation of women voice in the farmers’ associations as well as marital/domestic responsibilities. 2. The Ministry stated that women farmers who are disproportionately affected by climate change, land degradation, and the use of unsafe chemicals etc adopts valuable indigenous knowledge and adaptation strategies to stem the impacts of climate change. However, the Ministry explained further that improvements can be made by strengthening the access to inputs, land rights, training, finance, and safer technologies in order to protect and also enhance national food. 3. The Consulting Team reiterated the that the training of women farmers and processors on climate smart and sustainable agricultural practices, financial literacy, digital literacy, and

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	<p>safety as well as training on healthy/safe use of chemicals would be part of the AGROW project.</p> <p>4. The Ministry mentioned the availability of some potential platforms (such as Gender desk officers in local govt cascaded to national level, women cooperatives and farmers associations- WOFAN, FADAMA etc) that are been utilized to report grievances. Also, other digital platform such as WhatsApp or SMS would be available for the AGROW Project.</p>
Remarks/Commitment	The Ministry affirmed its commitment to ensure its collaboration and support for the AGROW project.

MDA	Federal Ministry of Labour & Employment	
Date of Consultation	21 th of August, 2025	
Venue	Ministry of Labour	
Language of Communication	English	
Introduction	The AGROW project was introduced to the team including the ESMF. Also, the meeting focused on how labour and social safeguards will be managed in the AGROW project especially the activities of the agricultural value chain, rural employment and occupational safety.	
Concerns Raised	Response	
<ol style="list-style-type: none"> 1. The key indicators of labour that should be included in the ESMF monitoring plan in order to effectively track labour and social performance effectively. 2. How will the Ministry ensure that contractors' staff can safely and effectively report grievances or labour violations? 3. What training and capacity-building opportunities could be provided to improve OHS awareness among farmers and value chain workers? 4. What strategies should be adopted to ensure equitable participation of vulnerable groups (e.g., rural women, youths, internally displaced 	<ol style="list-style-type: none"> 1. The consulting team responded that the AGROW project will adopt a functioning monitoring plan and other environmental, Occupational, Health and Safety (OHS), worker grievance redress mechanism and gender inclusion clauses. Also, it was mentioned that there are some potential platforms that are been utilized to report grievances such as Gender desk officers in local govt cascaded to national level, women cooperatives and farmers associations such as WOFAN, FADAMA, Digital platform av also been made available such as established WhatsApp or SMS. 2. The consulting team stated that the AGROW 	

<p>persons) in project activities?</p>	<p>project would ensure regular monitoring of projects and also ensure prompt receipt of feedback in order to in support the mitigation measures for emerging social or environmental risks.</p> <p>3. Training of women farmers and processors on climate smart and sustainable agricultural practices, financial literacy, digital literacy and safety, HSE and on safe use of chemicals.</p> <p>4. The Ministry suggested that the AGROW project should aligned with existing community institutions (for example cooperatives, farmer groups, local councils) to ensure seamless implementation and sustainability.</p>
<p>Remarks/Commitment</p>	<p>The Ministry affirmed its commitment to ensure its collaboration and support for the AGROW project.</p>

<p>MDA</p>	<p>Farm Input Support Services (FISS)</p>	
<p>Date of Consultation</p>	<p>22nd & 26th of August, 2025</p>	
<p>Venue</p>	<p>FISS Office (Bank of Agriculture Building), Central Area, Abuja</p>	
<p>Language of Communication</p>	<p>English</p>	
<p>Concerns Raised</p>	<p>Response</p>	
<p>1. How effectively is the current distribution system in reaching small-holder farmers in rural and difficult terrains.</p> <p>2. What are the bottlenecks that affect timely delivery of inputs.</p> <p>3. How is the issue of adulterated, expired or substandard inputs being addressed.</p> <p>4. Is there any available policy guiding fertilizer quality control in Nigeria?</p>	<p>1. It was mentioned that the Government has initiated the National Agricultural Growth Scheme – Agro-Pocket (NAGS-AP) and other subsidized input schemes which have been rolled out in some state.</p> <p>2. The Ministry stated that the challenges such as delay in delivery is undermined by a combination of several factors such as, infrastructure/logistics, weak network of distributors, non-availability of database of different stakeholders, quality assurance, over-pricing by Middlemen and gaps due to improper coordination.</p> <p>3. It was stated that there is a robust legal framework (NFQCA 2019 and 2020) supporting mechanisms (inspection, arrest, complaint platforms) to address adulterated, expired or sub-standard inputs. it was mentioned that there are mechanisms in</p>	

	<p>place and evolving for climate-resilient and environmentally-friendly inputs (drought-resistant seeds, bio-fertilizers, organic pesticides) in Nigeria, however the system is partially operational, but needs ramping up in terms of scale, accessibility for rural smallholders, affordability, certification, and last-mile delivery.</p> <p>4. The Agency talked about the existence of the National Fertilizer Quality Control ACT 23 of 2019 including the National Fertilizer Quality Control Regulations 2020.</p>
Remarks/Commitment	All the participants at the visual and online meeting affirmed to cooperate with the AGROW project.

Annex 3: Detailed Project Description

Overview of Components (with envelope)

1. **Component 1 — De-risking Private Sector Investments in Aggregation and Offtake of Smallholder Commodities (US\$230m):** Establishes a competitive **Agribusiness De-risking and Market Linkage Facility (ADMLF)** to co-finance private offtakers/aggregators through **performance-based matching grants**, anchored in verified smallholder benefits and milestone-linked tranching. Managed by a professional **Fund Manager** with fiduciary and ESF oversight.
2. **Component 2 — Public Investments for Modernization of Smallholder Production (US\$180m):** (2.1) **Research–Extension–Technology Transfer** to generate/adapt climate-smart technologies and disseminate them via farmer field schools, demos and lead farmers; (2.2) **Digital Agricultural Ecosystem** (national farmer/farm registry, updated soil map, AI-enabled weather advisories via NiMet, interoperability standards/APIs, National Electronic Extension Platform). **PBC1** (public extension reach) and **PBC2** (registry coverage) apply.
3. **Component 3 — Policy and Enabling Environment for Private Investment in Inputs Markets (US\$50m)** (plus land tenure actions): (i) **Early-Generation Seed (EGS)** pipeline and **seed regulatory reforms** with NASC (labs upgrades, center of excellence/seed bank, third-party certification, SEEDCODEX/barcoding, ECOWAS-aligned variety release); (ii) **Fertilizer regulatory system** modernization (quality labeling, third-party inspection, reference lab + up to 5 regional labs); and (iii) **land tenure security** with scaled **Certificates of Occupancy (CofO)** issuance. **PBC3–PBC6** cover EGS volumes, seed regs, fertilizer compliance, and CofOs.
4. **Component 4 — Project Coordination, Monitoring and Evaluation (US\$40m):** Federal Project Coordination Unit (FPCU) at FMAFS; SPIUs in participating states; M&E (with IVA for PBC/EC verification); fiduciary and **ESF** management; communications, knowledge, gender, GM/citizen engagement; coordination with complementary operations (e.g., roads, energy, SAPZ).

Component-by-Component: Detailed Project Activities (with E&S footprint cues for ESMF)

Component 1 — ADMLF for Aggregation & Offtake (US\$230m)

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Objective. Reduce sourcing risk and transaction costs that deter offtakers from engaging dispersed smallholders; crowd in private capital to scale inclusive, performance-anchored supply models.

Core activities financed/enabled under ADMLF

1. Facility establishment & management

- Set up the **ADMLF** as a national, competitive, demand-driven matching-grant window; develop and adopt the **Grant Procedures/Operations Manual**; constitute an independent **Investment Committee**; competitively recruit a **Fund Manager** with state presence.

2. Performance-based matching grants to private offtakers/aggregators/AgTechs (state-eligible only)

- **Design and award** grants with variable cost-sharing (tiered by size/scope), tied to **verified outputs** (e.g., number of contracted farmers, volumes delivered under quality specs, on-time payments), with **tranche disbursements** after milestone verification by the Fund Manager
- **Eligible investments** (illustrative, to be specified in Manual):
 - **Farmer engagement & embedded services:** BDS/cooperative strengthening; governance training; last-mile input distribution; embedded extension; digital tools; onboarding costs; **short-tenor risk-mitigants** (e.g., time-bound working capital for first cycles, simple parametric weather insurance pilots).
 - **Aggregation & logistics:** collection/aggregation centers; produce **storage/handling** (including cold chain where justified); traceability; **leasing of appropriate machinery/equipment**; first-mile transport solutions.
 - **Processing & value addition:** primary processing/cleaning/grading/destoning; packaging; small processing units; **renewable/energy-efficient options** for equipment powering.
- **Joint business plans** between the private offtaker and one/more farmer cooperatives/producers' organizations as a **pre-condition**, setting volumes/quality/pricing/embedded services and responsibilities.

3. Fund management functions & controls

- Pipeline development; technical/financial appraisal; **conflict-of-interest controls**; **use-of-funds verification**; M&E and lessons; **fiduciary oversight**; quarterly/annual reporting; all **subprojects subject to ESF screening** and **Bank prior review** of ESF instruments where required.

ESMF cues (typical E&S aspects to screen/mitigate)

- **Likely instruments:** ESMPs (construction/rehab of aggregation/storage/processing); OHS plans; Waste/effluent management (solid organic waste, wastewater, packaging); traffic and community safety for first-mile logistics; energy/water efficiency measures; where small civil works require land, apply RPF/RAP per PAD ESF; **High-risk activities excluded** under the Facility's ESMS; **ESS9** applies to the Fund Manager and private recipients.

Component 2 — Public Investments for Modernization (US\$180m)

Sub-component 2.1 — Research, Extension & Technology Transfer (US\$135m)

Objective. Generate, adapt, and transfer **climate-smart, nutrition-sensitive** technologies into farmers' hands through a coordinated R-E-TT pipeline responsive to market demand.

Activities

- **Technology development & validation**
 - Support modern **breeding materials** (e.g., drought-tolerant rice/maize/soy; disease-free rapid cassava multiplication); improved fertilizer recommendations; agronomic **PoPs** (e.g., SRI, Urea Deep Placement)

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tailored to agro-ecologies; collaboration with **NCRI, IITA, AfricaRice**, NASC and seed-grower associations for aligned EGS and varietal multiplication pipelines.

- **Public dissemination of technologies (PBC1)**

- Strengthen federal/state extension via **farmer field schools, lead farmers, demonstration plots, field days**, and broad outreach (radio/digital) to increase awareness and **adoption**; **PBC1 tracks number of farmers reached** through public dissemination (complementing market-anchored adoption under Component 1).

ESMF cues

- Generally **moderate-risk** soft activities; for demos/field days, manage OHS, crowd safety, pesticide handling under **IPM/PMP**; ensure inclusion of women/youth and accessibility; apply **SEP/GM** for feedback loops.

Sub-component 2.2 — Digital Agricultural Ecosystem (US\$45m)

Objective. Build a three-layer **digital stack** to enable data-driven services and scale advisory/market tools. Federal sets standards/core services; states enumerate and maintain records. **PBC2** ties financing to registry coverage.

Activities

- **Layer 1 — Foundational data & services**

- **National farmer & farm registry** (unique IDs; geo-referenced plots; socio-economic and enterprise data), aligned to national digital ID; **updated digital soil map** (sampling, crop response trials, analytics with IITA soil hub); **NiMet AI-enabled weather forecasts** integrated for localized alerts/advice.

- **Layer 2 — Interoperability & data governance**

- Develop **APIs/standards** and **data-governance protocols** to grant permission-based access for AgTechs, processors, input suppliers, and state systems; TA for rules on privacy, update cycles, and third-party integrations (bundled credit/insurance/traceability).

- **Layer 3 — User-facing delivery**

- **National Electronic Extension Platform (NEEP)** providing **SMS/IVR/WhatsApp/radio** advisories at scale (weather as MVP), with states curating localized content and ADPs/extension delivering last mile; enable platform linkages for **traceability** (e.g., soy), input bundles, and offtake tools.

ESMF cues

- **Data privacy & inclusion risks:** ensure policies for consent, data security, non-discrimination; manage digital exclusion (women, elders, persons with disabilities, remote communities) via multi-channel outreach; minor equipment installations may need **ESMPs** (server rooms/power backup); integrate **GM** for digital services.

Component 3 — Policy & Enabling Environment for Inputs (US\$50m) and Land Tenure

3.1 Early-Generation Seed (EGS) and Seed Regulatory System (with NASC)

Objective. Expand a predictable **EGS pipeline** and modernize regulations/quality assurance to crowd in private seed multiplication. **PBC3** and **PBC4** apply.

Activities

- **Commercial EGS system:** Joint planning (demand-led) between research and private multipliers; **licensing**, transparent production/pricing frameworks; annual EGS production schedules (rice/cassava emphasized); **PBC3** tracks **EGS volumes** handed to private multipliers.
- **Regulatory upgrades (NASC):**
 - **Third-party certification** rollout; **SEEDCODEX/barcode** authentication at bag level; **decentralized inspection** to accredited entities; streamline **ECOWAS-aligned variety release**; **labs upgrades** (seed testing), **center of excellence for seed technology** and **seed bank**; **PBC4** tracks adoption/operationalization of regs.

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ESMF cues

- **Labs and facilities** (construction/rehab): screen for land take (apply RPF/RAP if needed), OHS in labs, hazardous materials/waste handling, energy/water efficiency, and community safety; **heritage chance-find** procedures for civil works.

3.2 Fertilizer Regulatory System (FISS, FMAFS)

Objective. Improve fertilizer **quality assurance** and enforcement to reduce adulteration and boost farmer confidence and private investment. **PBC5** applies.

Activities

- **Quality labeling & inspection:** Design/roll-out of **FISS-compliant labels**; **third-party inspection guidelines**; market sampling/testing protocols; **reference laboratory** and up to **five** regional fertilizer testing labs; **PBC5** tracks share of market bags properly labeled and compliant.

ESMF cues

- New/rehab labs: OHS and chemical management, air/ventilation, PPE; hazardous waste disposal; utilities efficiency; traffic/community safety during works; land screening where sites are new

3.3 Land Tenure Security (States)

Objective. Increase **Certificates of Occupancy (CofO)** issuance—prioritizing cooperatives (women/youth inclusive) linked to Component 1—to unlock investment and reduce tenure-related risk. **PBC6** applies.

Activities

- **Administrative streamlining and issuance at scale** of CofOs/CROs; transparency of steps/fees/timelines; adoption of **FRILIA-consistent** approaches; verification by IVA using registry/parcel spot checks; **PBC6** disbursement on verified issuance.

ESMF cues

- **Social risks:** risk of exclusion/elite capture—apply **SEP/GM**, targeted inclusion measures for women/youth; potential disputes—apply FRILIA-consistent grievance and due process; **no physical displacement** unless processed under RPF/RAP with compensation/restoration per ESS5.

Component 4 — Coordination, M&E, ESF & Communications (US\$40m)

Activities

- **Institutional set-up:** Establish **FPCU (FMAFS)** and **SPIUs**; staff procurement/FM, **Environmental & Social** specialists, M&E, gender, comms; Steering Committees at federal/state levels.
- **M&E and verification:** Baseline, mid-term, endline; **Independent Verification Agency (IVA)** for **PBCs** and **state Eligibility Criteria (ECs)**; geotagged reporting; impact evaluation (e.g., via GIL).
- **Fiduciary & ESF management:** Operate ESF system for screening, instrument preparation (**ESMF, RPF, LMP, SEP, PMP/IPC, ESCP**); **SEA/SH Action Plan**, worker/Project GMs; **SERVICOM-integrated GM**; capacity building for SPIUs/Fund Manager and private recipients.
- **Coordination with complementary projects:** Interface with roads/energy/irrigation/logistics programs (e.g., **RAAMP, SPIN, SAPZ**) to ensure last-mile access and utilities to clusters.

ESMF cues

- Ensure **screening protocols** are embedded in the ADMLF Manual and SPIU procedures; define **exclusion list** for high-risk activities; establish **oversight and reporting** cadence; operationalize **SEA/SH** mitigation and **GM** at federal/state/facility levels.

Performance-Based Conditions (PBCs) — Activities & Disbursement Triggers (for ESMF monitoring cross-walk)

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- **PBC1:** *Reach of public sector extension services* — finance/track **number of farmers reached** with verified extension contacts (field/digital), de-duplication and spot-checks by IVA.
- **PBC2:** *Farmer/farm registry coverage* — fund **state enumeration/verification** and data quality audits; IVA extracts registry records and performs field verification.
- **PBC3:** *EGS volumes to private multipliers* — plan/produce **foundation seed** and handover logs; IVA verifies lots, certification, and transfers.
- **PBC4:** *Adopt/implement seed regulations* — prepare, consult, legally adopt (gazette) and operationalize regulations (licensing, fees, guidance); IVA verifies each step.
- **PBC5:** *Fertilizer quality compliance* — FISS sampling/testing and compliance rates for labeled bags; IVA verifies protocols and results.
- **PBC6:** *Issuance of CofOs* — states submit lists and parcel IDs; IVA cross-checks registries and spot-verifies parcels/beneficiaries.

Implementation & ESF Architecture (for Annex narrative)

- **Implementing structure:** FMAFS + participating states; FPCU for federal activities (Component 2/3 leadership, overall coordination); **ADMLF Fund Manager** for Component 1 operations; SPIUs implement state activities; National/State Steering Committees provide policy oversight.
- **ESF classification & standards:** Overall **Substantial** risk; **ESS1/2/3/4/5/6/8/9/10** relevant; **ESF instruments** to be prepared/disclosed (ESMF, RPF, LMP, SEP; site-specific ESMPs/RAPs; SEA/SH Action Plan; ESCP). For ADMLF, a **fit-for-purpose ESMS** will govern subproject screening, exclusion of high-risk activities, and instrument preparation prior to disbursement.
- **Citizen engagement & GM:** Multi-channel engagement; **SERVICOM-linked** electronic GM; project/worker GMs; **SEA/SH** service mapping and survivor-centered response

Component–Activity–E&S Instrument Cheat-Sheet (to guide screening)

Component	Illustrative activities	Typical E&S instruments & issues
1 ADMLF (Offtake & aggregation)	Matching grants to offtakers for aggregation centers, storage/cold chain, primary processing , embedded services, machinery leasing, traceability; Fund Manager ops & M&E	Screening via ADMLF ESMS; ESMPs for works; OHS plans; Waste/effluent mgmt; traffic/community safety; resource-efficiency; apply RPF/RAP if any land take; ESS9 FI compliance; high-risk exclusion.
2.1 Research–Extension–TT	Breeding/EGS alignment; PoPs (SRI/UDP); demos/FFS/lead farmer networks; public outreach (PBC1)	ESMPs for any physical upgrades; safe pesticide/IPM under PMP ; OHS/community safety at demos; inclusive access; SEP/GM for feedback.
2.2 Digital ecosystem	Farmer/farm registry , soil map refresh, NiMet AI weather; APIs/standards; NEEP digital	Data privacy/security protocols; accessibility and inclusion; minor infrastructure (server/power)

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	advisory (SMS/IVR/WhatsApp/radio); PBC2	ESMPs; GM for digital services.
3. Inputs & land	EGS expansion to private multipliers (PBC3); seed regs and NASC labs/seed bank (PBC4) ; fertilizer labeling, reference + 5 labs (PBC5) ; CofOs issuance at scale (PBC6)	For labs/centers: ESMPs, OHS, hazardous waste mgmt; potential RAP if land acquisition; community/traffic safety; FRILIA-consistent land processes; inclusion of women/youth; strong GM.
4. Coordination, M&E, ESF	FPCU/SPIUs staffing; IVA for PBC/EC verification; ESF rollout (ESMF, RPF, LMP, SEP, ESCP, SEA/SH plan, GM); synergy with roads/energy/irrigation/SAPZ	ESF capacity building; routine ESF performance reporting; SERVICOM-integrated GM; SEA/SH mitigation; cross-project interface protocols.

Project Components and Key Activities

Environmental and social risks and impacts under AGROW are expected to arise primarily from Components 1 and 2, reflecting the nature, scale, and delivery mechanisms of the proposed interventions.

Component 1 — De-risking Private Sector Investments in Aggregation & Offtake

Key activities to be delivered through the Agribusiness De-risking & Market Linkage Facility (ADMLF):

- Establish/upgrade aggregation centers (collection, weighing, grading).
- Construct/rehabilitate storage and cold chain assets (silos, warehouses, modular cold rooms).
- Install small/medium agro-processing units (rice milling, cassava processing, oilseed crushing, maize drying).
- Provide post-harvest assets (threshers, shellers, dryers, moisture meters, pallets, forklifts).
- Develop quality/traceability systems (barcode/QR, batch records, aflatoxin testing, SOPs).
- Facilitate inclusive supply contracts with cooperatives (pricing, volumes, delivery windows; women/youth participation).
- Deliver business development services (BDS) and training (quality standards, logistics, financial literacy).
- Enable last-mile logistics and internal yard/traffic improvements within sites (coordination with other projects for external roads).

Component 2 — Public Investments for Modernization

Sub-component 2.1: Research, Extension & Technology Transfer

- Adaptive research and trials for climate-smart technologies (SRI, UDP; improved varieties; cassava rapid multiplication).
- Seed system coordination with NASC and private seed companies (EGS pipeline; breeder/foundation seed production).
- Establish and operate demonstration plots and farmer field schools; develop extension content and lead farmer networks.
- Training of extension agents; women-focused outreach; youth agripreneur programs.
- Acquire small equipment and inputs for trials (soil testing kits, PPE, precision planters)

Sub-component 2.2: Strengthening the Digital Agricultural Ecosystem

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- Build national digital farm and farmer registry (enumeration, verification; align with national digital ID).
- Update digital soil maps (sampling, crop response trials, analytics with IITA Hub).
- Strengthen NiMet AI-based weather forecasting and interfaces.
- Develop data-sharing and interoperability (APIs, standards, governance).
- Deploy a user-facing advisory platform (SMS/IVR/WhatsApp/radio; weather, agronomy, market advisories; traceability).

Component 3 — Policy & Enabling Environment for Inputs Markets and Land Tenure

- Establish structured Early-Generation Seed (EGS) collaboration (licensing, production schedules; private multipliers).
- Upgrade NASC labs and seed bank; roll out SEEDCODEX/barcode authentication; decentralize inspection.
- Strengthen FISS fertilizer regulation (labeling technologies; third-party inspection; build/upgrade reference and regional labs).
- Implement land tenure reforms with states; issue certificates of occupancy to beneficiaries and cooperatives (including women/youth).

Component 4 — Project Coordination, Monitoring & Evaluation

- Stand-up FPCU with ESF specialists (environment, social, gender/SEA-SH, OHS, M&E, communications).
- Operate a multi-tier GM (federal/state; digital and in-person; SEA-SH-sensitive channels).
- Conduct ESF capacity building for PIUs, states, off-takers, and cooperatives.
- Environmental and social monitoring (audits, supervision, incident management).
- Execute impact evaluations (e.g., GIL), knowledge products, and communications strategy.
- Coordinate with infrastructure projects (roads, energy, digital connectivity) to minimize cumulative impacts.

Annex 4: AGROW Project Gap Analysis and Alignment Actions between World Bank Environmental and Social Standards (ESS) and Nigerian National Regulations

1. Introduction

This gap analysis assesses the alignment between the **World Bank Environmental and Social Framework (ESF)**—specifically the relevant **Environmental and Social Standards (ESS)**—and **Nigeria’s national legal, regulatory, and institutional framework**, as applicable to the **AGROW Project** (agriculture, rural infrastructure, water resources, and value-chain development).

The objective is to: - Identify **gaps and inconsistencies** between WB ESS requirements and Nigerian laws - Define **practical alignment actions** to ensure full ESF compliance during project preparation and implementation - Support integration into the **ESMF, ESCP, and project operational manuals**

2. Applicable Nigerian Legal and Institutional Framework (Summary)

Key national instruments include: - Constitution of the Federal Republic of Nigeria (1999, as amended) - Environmental Impact Assessment (EIA) Act Cap E12 LFN 2004 - National Environmental Standards and Regulations Enforcement Agency (NESREA) Act 2007 - Federal Ministry of Environment (FMEnv) Guidelines - Land Use Act Cap L5 LFN 2004 - National Gender Policy (2006) - Labour Act Cap L1 LFN 2004 - Employees’ Compensation Act 2010 - Child Rights Act 2003 - State Environmental Protection Agencies (SEPAs) Laws - Water Resources Act (proposed / sectoral instruments)

3. ESS-by-ESS Gap Analysis and Alignment Actions

ESS1: Assessment and Management of Environmental and Social Risks and Impacts

WB Requirement: - Integrated environmental and social risk assessment - ESIA/ESMP proportionate to risks - Stakeholder engagement throughout project lifecycle

Nigeria Framework: - EIA Act mandates ESIA for listed projects - Focuses primarily on biophysical impacts - Limited coverage of social risk management and cumulative impacts

Gaps Identified: - No formal requirement for Social Impact Assessment (SIA) standalone or integrated - Weak monitoring and adaptive management provisions

Alignment Actions: - Prepare **ESMF, site-specific ESMPs, and Social Management Plans** beyond statutory EIA - Apply WB risk classification even where EIA thresholds are not triggered - Include cumulative and indirect impact assessment in project instruments

ESS2: Labor and Working Conditions

WB Requirement: - Fair treatment of workers - Occupational Health and Safety (OHS) - Prohibition of child and forced labor - Worker Grievance Mechanism

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Nigeria Framework: - Labour Act - Employees' Compensation Act - Factory Act - Child Rights Act

Gaps Identified: - OHS enforcement inconsistent at state/local levels - No mandatory worker GM - Limited coverage of community workers and contracted labor

Alignment Actions: - Develop and implement a **Labour Management Procedure (LMP)** - Establish a **Worker GM** separate from community GM - Apply WB OHS Guidelines (WBG EHS Guidelines)

ESS3: Resource Efficiency and Pollution Prevention and Management

WB Requirement: - Efficient use of water, energy, and raw materials - Pollution prevention and waste management - Climate-smart practices

Nigeria Framework: - NESREA regulations on waste, effluent, air quality - Sector-specific environmental regulations

Gaps Identified: - Limited enforcement capacity - Climate change mitigation/adaptation not systematically integrated

Alignment Actions: - Apply **WBG EHS Guidelines** for agriculture and agro-processing - Integrate **climate-smart agriculture** and water-use efficiency measures - Strengthen waste and agro-chemical management plans

ESS4: Community Health and Safety

WB Requirement: - Protection from construction and operational risks - Traffic and road safety - Emergency preparedness

Nigeria Framework: - Public Health laws - Road safety regulations (FRSC) - Environmental sanitation laws

Gaps Identified: - No structured requirement for Community Health and Safety Plans - Weak emergency response planning at project level

Alignment Actions: - Prepare **Community Health and Safety Plans** - Include traffic management, GBV/SEA risk mitigation, and emergency response measures - Sensitize communities on project-related risks

ESS5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement

WB Requirement: - Avoid or minimize displacement - Compensation at full replacement cost - Livelihood restoration

Nigeria Framework: - Land Use Act - State land administration laws

Gaps Identified: - Compensation based on depreciated value, not replacement cost - Limited livelihood restoration provisions

Alignment Actions: - Apply **WB ESS5 principles** over national valuation methods - Prepare **Resettlement Action Plans (RAPs)** where required - Ensure livelihood restoration and transitional support

ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

WB Requirement: - Protection of natural habitats - Sustainable resource use - Avoidance of critical habitats

Nigeria Framework: - Forestry laws - National parks and wildlife regulations

Gaps Identified: - Weak biodiversity baseline data - Limited enforcement against habitat degradation

Alignment Actions: - Conduct biodiversity screening and assessments - Avoid critical habitats; apply mitigation hierarchy - Promote sustainable land and water management practices

ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

WB Requirement: - Free, Prior, and Informed Consent (FPIC) - Culturally appropriate benefits

Nigeria Framework: - No explicit legal recognition of Indigenous Peoples

Gaps Identified: - Absence of FPIC requirement in national law

Alignment Actions: - Screen for ESS7 applicability - Apply WB ESS7 procedures where relevant - Ensure inclusive and culturally appropriate consultations

ESS8: Cultural Heritage

WB Requirement: - Protection of tangible and intangible cultural heritage - Chance finds procedures

Nigeria Framework: - National Commission for Museums and Monuments Act

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Gaps Identified: - Limited integration of chance finds procedures in EIAs

Alignment Actions: - Include **Chance Finds Procedures** in ESMPs and contracts - Engage relevant heritage authorities

ESS10: Stakeholder Engagement and Information Disclosure

WB Requirement: - Inclusive stakeholder engagement - Continuous disclosure and feedback - Project-level GM

Nigeria Framework: - Public consultation under EIA Act (limited scope)

Gaps Identified: - Consultation often one-off - Limited inclusion of vulnerable groups

Alignment Actions: - Prepare and implement a **Stakeholder Engagement Plan (SEP)** - Establish and publicize a **functional GM** - Ensure inclusive, gender-sensitive engagement

4. Summary Alignment Matrix (Indicative)

ESS	Key Gap	Core Alignment Instrument
ESS1	Limited social risk coverage	ESMF, ESMP
ESS2	No worker GM	LMP
ESS3	Weak climate integration	EHS Guidelines, CMP
ESS4	No CHS plans	CHS Plan
ESS5	Compensation gap	RAP
ESS6	Biodiversity protection gaps	Biodiversity Management Plan
ESS8	Chance finds gaps	Chance Finds Procedure
ESS10	Weak engagement	SEP, GM

5. Conclusion

While Nigeria's regulatory framework provides a solid foundation for environmental management, **gaps remain in social risk management, stakeholder engagement, labor standards, and resettlement practices**. For the AGROW Project, **World Bank ESS requirements will apply as the overriding standard**, with national laws serving as the minimum baseline. The alignment actions outlined above should be embedded in the **ESMF, ESCP, and implementation manuals** to ensure full compliance and effective risk management.

6. Concise WB-Style Gap Analysis Matrix (ESS vs Nigeria vs Alignment Actions)

ESS	Key Nigerian Provisions	Identified Gaps	AGROW-Specific Risks	Alignment Actions (ESCP-Linked)
ESS1	EIA Act; FMEEnv Guidelines	Limited social, cumulative risk coverage	Irrigation schemes, rural roads, agro-processing clusters	Prepare ESMF; screen all subprojects; prepare ESMPs incl. social risks; apply WB risk classification (ESCP: E&S instruments prepared & disclosed prior to works)
ESS2	Labour Act; Factory Act; ECA	No worker GM; weak OHS enforcement	Farm labor, contractors, agro-processing workers	Implement LMP; enforce WBG EHS Guidelines; establish Worker GM (ESCP: LMP adopted before mobilization)
ESS3	NESREA pollution regs	Weak climate/resource efficiency integration	Water abstraction, agro-chemicals, processing effluent	Apply WBG EHS Guidelines; climate-smart ag practices; waste/effluent plans (ESCP: ESMPs include resource efficiency measures)
ESS4	Public Health laws; FRSC	No formal CHS planning	Traffic, dust, GBV/SEA	Prepare CHS Plans; traffic & emergency response measures (ESCP: CHS measures included in ESMPs)
ESS5	Land Use Act	Compensation below replacement cost	Irrigation canals, access roads	Apply ESS5 principles; prepare RAPs; livelihood restoration (ESCP: RAPs approved and implemented before

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ESS	Key Nigerian Provisions	Identified Gaps	AGROW-Specific Risks	Alignment Actions (ESCP-Linked)
				displacement)
ESS6	Forestry/Wildlife laws	Weak habitat protection	Wetlands, riparian zones	Biodiversity screening; avoid critical habitats (ESCP: biodiversity measures integrated in ESMPs)
ESS7	None explicit	No FPIC	Underserved rural groups	Screen applicability; apply ESS7 if triggered (ESCP: ESS7 framework applied where relevant)
ESS8	NCMM Act	Chance finds weak	Earthworks	Include Chance Finds Procedures in contracts (ESCP: chance finds applied)
ESS10	EIA consultation	One-off, non-inclusive	Multi-community footprint	Implement SEP & GM (ESCP: SEP disclosed & GM operational)

7. Alignment with ESCP Commitments (Verbatim Mapping)

All alignment actions above correspond directly to ESCP commitments, notably: - Preparation, disclosure, and implementation of **ESMF, SEP, LMP, RAPs, ESMPs** - Application of **WBG EHS Guidelines** - Establishment of **functional GMs (community & worker)** - No commencement of civil works prior to instrument approval

8. Tailoring to AGROW Project Components

Irrigation & Water Infrastructure

- ESS1, ESS3, ESS6, ESS5 most relevant
- Focus on water abstraction impacts, land take, wetlands
- Instruments: ESMP, RAP, Water & Biodiversity Management Plans

Rural Roads & Access Infrastructure

- ESS1, ESS4, ESS5, ESS8
- Traffic safety, dust/noise, land acquisition
- Instruments: ESMP, CHS Plan, RAP, Chance Finds

Agro-Processing & Value Chains

- ESS2, ESS3, ESS4
- Labor conditions, waste/effluent, OHS
- Instruments: LMP, OHS Plan, Waste Management Plan

9. Use of Country Systems – Justification Paragraph

The AGROW Project will apply Nigeria’s national environmental and social regulatory framework as the baseline for compliance, supplemented by the World Bank Environmental and Social Standards (ESS) where gaps exist. Nigeria’s EIA Act, NESREA regulations, labour and land administration laws provide a robust foundation for environmental assessment, pollution control, and labor management. However, where national provisions are silent or less stringent—particularly on social risk management, stakeholder engagement, involuntary resettlement valuation, labor grievance mechanisms, and biodiversity protection—the Project will apply the World Bank ESS requirements as the overriding standard. This hybrid approach ensures regulatory consistency with national systems while achieving full alignment with the World Bank ESF.

11. ESS1–ESS10 Line-by-Line Compliance Checklist (Aligned with Gap Matrix)

This checklist demonstrates direct alignment between the identified gaps, mitigation actions, and ESS compliance requirements for the AGROW Project.

ESS1: Assessment and Management of E&S Risks

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- Project screened for E&S risks using ESMF procedures
- Risk classification applied per WB ESF
- ESMPs prepared and disclosed prior to works
- Cumulative and indirect impacts assessed
- Monitoring and reporting mechanisms established

ESS2: Labor and Working Conditions

- Labour Management Procedures prepared and adopted
- Worker GM established and operational
- OHS measures aligned with WBG EHS Guidelines
- Prohibition of child and forced labor enforced

ESS3: Resource Efficiency and Pollution Prevention

- Resource efficiency measures integrated into ESMPs
- Waste and effluent management plans prepared
- Agro-chemical use controlled and monitored
- Climate-smart practices applied

ESS4: Community Health and Safety

- Community Health and Safety Plans prepared
- Traffic and road safety measures implemented
- GBV/SEA risk mitigation measures included
- Emergency preparedness and response plans in place

ESS5: Land Acquisition and Resettlement

- Avoidance/minimization of displacement demonstrated
- RAPs prepared and approved prior to displacement
- Compensation at full replacement cost provided
- Livelihood restoration measures implemented

ESS6: Biodiversity Conservation

- Biodiversity screening conducted
- Critical habitats avoided
- Mitigation hierarchy applied
- Sustainable land and water management promoted

ESS7: Underserved Traditional Local Communities

- Screening for ESS7 applicability conducted
- Culturally appropriate consultations carried out
- FPIC applied where required

ESS8: Cultural Heritage

- Cultural heritage screening undertaken
- Chance Finds Procedures included in contracts
- Engagement with NCMM ensured

ESS9: Financial Intermediaries

- Fund manager of the ADMLF to update or prepare ESMS prior to accessing the funding

ESS10: Stakeholder Engagement

- Stakeholder Engagement Plan prepared and disclosed
- Inclusive consultations conducted throughout lifecycle
- Project-level GM established and functional

Annex 5: Project Activity Risk Mapping Tool

Purpose of this Tool

This matrix identifies the intersection between specific **AGROW sub-components** and the **World Bank Environmental and Social Standards (ESS)**. It should be used during the initial project planning phase to determine which safeguard specialists (Environmental, Social, or OHS) need to be deployed for site visits.

Risk Mapping Matrix

Project Activity (Sub-Component)	Likely E&S Risks & Impacts	Relevant ESS	Potential Mitigation Instrument
Irrigation Modernization & Rehabilitation	Water depletion, soil salinization, disturbance of aquatic habitats, and potential land disputes.	ESS1, ESS3, ESS5, ESS6, ESS10	ESIA/ESMP, IPMP, RAP, GM, SEP
Construction of NASCs laboratory and Aggregation Centers / Hubs	Soil erosion, dust/noise pollution, waste generation, and labor influx risks.	ESS1, ESS2, ESS3, ESS4, ESS10	ESMP, C-ESMP, OHS Plan, LMP, SEP GM
Provision of Seeds & Agrochemicals	Soil/Water contamination, pesticide toxicity, and health risks to farmers.	ESS3, ESS4, ESS10	IPMP, Training Manuals, SEP, GM
Development of Digital Farmer Registries	Data privacy concerns and exclusion of non-digitally literate farmers.	ESS1, ESS4, ESS10	DPIA (Data Protection Impact Assessment) SEP, GM
Large-Scale Land Clearing for Clusters	Loss of biodiversity, displacement of smallholders farmers, and soil degradation.	ESS5, ESS6, ESS10	RAP, Biodiversity Mgmt Plan, SEP, GM
Market Infrastructure (Cold Chains/Processing)	High energy consumption, wastewater discharge, and noise pollution.	ESS3, ESS4, ESS10	ESMP, Resource Efficiency Plan

How to Use This Tool

1. **Identify the Activity:** Match the proposed subproject to the "Project Activity" column.
2. **Assess Severity:** Evaluate if the "Likely Risks" are localized or widespread.

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3. **Trigger Standards:** Note the "Relevant ESS" columns to ensure the correct World Bank standards are referenced in the Terms of Reference (ToR) for consultants.
4. **Select Instrument:** Use the "Potential Mitigation Instrument" column to draft the initial Safeguard Instrument Plan in the **Safeguards Information System (SIS)**

Risk Sensitivity Legend

- **Red (High Sensitivity):** Likely requires a full ESIA and RAP; high level of World Bank oversight.
- **Yellow (Moderate Sensitivity):** Managed through standard ESMPs and generic OHS guidelines.
- **Green (Low Sensitivity):** Managed through environmental clauses in contractor bidding documents.

Annex 6: Map of Participating States and Value Chain Hotspots

1. Purpose and Application

This mapping tool is used by the FPCU and SPIUs to:

- Identify high-risk agricultural zones where **ESS3** (Resource Efficiency) and **ESS6** (Biodiversity) are most critical.
- Prioritize the deployment of state-level **E&S Specialists** based on the intensity of value chain activities.
- Coordinate with **SEPA**s for localized environmental monitoring.

2. Value Chain Hotspot Matrix

The table below identifies the primary agricultural zones and the specific E&S sensitivities associated with each priority crop.

State	Priority Value Chain(s)	Specific Hotspots (LGAs/Clusters)	Primary E&S Sensitivity
Kano	Rice, Wheat, Tomato	Kadawa, Kura, Bagwai	High: Water use efficiency (ESS3) and pesticide management (IPMP).
Kaduna	Tomato, Ginger, Maize	Makarfi, Ikara, Kachia	Moderate: Soil erosion and labor management in ginger processing.
Benue	Soybeans, Citrus, Roots/Tubers	Gboko, Katsina-Ala, Otukpo	High: Land tenure security (ESS5) and biodiversity in forest fringes.
Ogun	Cassava, Poultry, Horticulture	Obafemi Owode, Yewa North	Moderate: Waste management (manure) and community health/safety.
Niger	Rice, Shea, Cereals	Bida, Mokwa, Wushishi	High: Community health (labor influx) and irrigation water quality.
Jigawa	Hibiscus, Sesame, Rice	Hadejia, Kazaure, Birniwa	High: Climate resilience and wetland protection (Hadejia-Nguru).

3. Geographic Data & Layering for SIS

For the **Safeguards Information System (SIS)**, each state must provide GIS coordinates (Shapefiles) for the following layers:

1. **Project Influence Area:** 5km buffer around irrigation hubs and aggregation centers.
2. **Environmental Sensitivities:** Locations of protected forests, rivers, and critical wetlands relative to the farm clusters.

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3. **Social Hotspots:** Proximity to schools, hospitals, and indigenous or underserved community settlements

4. Visual Legend for Mapping

When generating site-specific maps for **ESIA/ESMP** reports, the following symbology must be used:

- **Green Circle:** Sustainable farm clusters (Low E&S Risk).
- **Yellow Triangle:** Processing hubs/Aggregation centers (Moderate E&S Risk).
- **Red Hexagon:** Large-scale irrigation or land clearing sites (Substantial/High E&S Risk).
- **Blue Shading:** Watersheds or water bodies requiring protection.

Instructions for SPIUs:

- **Update Frequency:** This map and matrix must be updated quarterly as new farm clusters are onboarded.
- **Conflict Overlap:** States must overlay these maps with local security data to ensure the safety of E&S field officers during monitoring visits.
- **Public Disclosure:** Simplified versions of these maps (showing project benefits and location of GM desks) must be posted at Local Government Secretariats.

Annex 7: Target Beneficiary Selection Criteria and Social Inclusion Guidelines

1. Objective

The primary objective of these guidelines is to ensure that at least **40% of project beneficiaries are women** and **30% are youth (aged 18–35)**, while also prioritizing vulnerable populations such as people with disabilities (PWDs) and displaced persons.

Category	Eligibility Criteria	Weighted Score	Verification Method
Gender Equity	Female-headed households or women-led farm cooperatives.	High	National ID / Cooperative Registration.
Youth Inclusion	Individuals aged 18–35 years engaged in agricultural value chains.	High	Birth Certificate / Voter's Card.
Land Access	Smallholder farmers with documented land rights or secured leases.	Essential	Lease agreements / Traditional Ruler attestation.
Vulnerability Status	Persons with Disabilities (PWDs) or Internally Displaced Persons (IDPs).	Priority	Social register / Community leader verification.
Economic Status	Farmers classified as "subsistence" or "low-income" in the state social register.	High	State Social Register (SSR) data.

3. The Selection Process (Step-by-Step)

1. **Community Sensitization:** Conduct town halls at times and locations accessible to women and PWDs (avoiding late nights or distant venues).
2. **Expression of Interest (EOI):** Beneficiaries submit simple forms. For non-literate applicants, **AGROW Desk Officers** provide oral translation and form-filling assistance.
3. **Vetting and Scoring:** The **SPIU Social Specialist** and **Community-Based Organizations (CBOs)** apply the weighted score matrix.
4. **Public Disclosure:** The list of selected beneficiaries is posted at the Local Government Secretariat for 7 days to allow for community verification and grievance reporting.

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5. **Final Validation:** Approval by the State Project Implementation Unit (SPIU) after resolving any exclusion-related complaints.

4. Mandatory Inclusion Guardrails

To prevent "Elite Capture" (where local leaders only select their relatives), the following rules apply:

- **No "Middle-Man" Fees:** Registration is 100% free. Any demand for payment must be reported to the **Grievance Mechanism (GM)**.
- **Clear and public rules:** This will help ensure combining inclusive and transparent decision-making in the selection process.
- **Embed transparency and social accountability:** proactive information disclosure to ensure budgets, procurement plans, contract awards, physical progress, and beneficiary lists are posted locally (boards, radio) and discussed in open meetings.

5. Monitoring Social Inclusion

The **Safeguards Information System (SIS)** will track selection through the following Key Performance Indicators (KPIs):

- Total number of beneficiaries disaggregated by **Gender, Age, and Disability**.
- Number of complaints received regarding the selection process and their resolution status.
- Percentage of project funds directly reaching female-led agribusinesses.

Annex 8: Permits and Approvals Tracker Template

1. Purpose

This tracker is managed by the **SPIU Environmental Specialist** and reviewed monthly by the **FPCU**. Its goal is to provide an "Early Warning System" for expiring permits and to identify bureaucratic bottlenecks in the approval chain between the Ministry of Agriculture and regulatory bodies (FMEnv/NESREA/SEPAs).

2. The Permit Tracker Log (Sample)

Subproject Name	Permit/ Approval Type	Issuing Authority	Status (Pending/ Approved/ Expired)	Date Submitted	Date Obtained	Expiry Date	Reference Number
<i>Ex: Kano Rice Hub</i>	EIA Certificate	FMEnv	Approved	10-Oct-25	15-Dec-25	15-Dec-28	FMEnv/EIA/2025/01
<i>Ex: Kano Rice Hub</i>	Water Use Permit	NIWA / State Water	Pending	05-Nov-25	--	--	--
<i>Ex: Benue Cluster</i>	LGC Land Approval	Gboko Local Govt	Approved	01-Sep-25	20-Sep-25	Permanent	LGC/LAND/77
<i>Ex: All Sites</i>	Pesticide License	PCN / NAFDAC	Approved	15-Nov-25	05-Jan-26	05-Jan-27	NAF/REG/092
<i>Ex: Kaduna Road</i>	Right of Way (RoW)	State Min. Works	Expired	20-Jul-24	15-Aug-24	15-Aug-25	KAD/WORKS/412

3. Permit Classification Guide

To ensure comprehensive tracking, the following categories must be monitored:

1. **Environmental Permits:** EIA Statements, Environmental Audit Reports (EAR), and Waste Management Permits.
2. **Resource Permits:** Water abstraction permits for irrigation and boreholes; Land Use Certificates/C of O.
3. **Social/Labor Permits:** Work permits for international consultants; Building permits for aggregation centers.
4. **Specialized Permits:** Pesticide registration/importation (IPMP) and Biodiversity "No-Objection" for forest-fringe activities.

4. Maintenance and Escalation Protocols

- **Monthly Updates:** The SPIU must update the "Status" and "Expiry Date" columns by the 5th of every month.

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- **The 90-Day Rule:** Any permit with an expiry date within 90 days must be flagged in **RED** on the SIS dashboard to trigger the renewal process.
- **The Escalation Trigger:** If a "Pending" permit remains unissued for more than 45 days beyond the SLA (Service Level Agreement), the FPCU will activate the **Inter-Ministerial Liaison** to resolve the delay.

5. Verification of Authenticity

- Scanned copies of the original permits (with official seals) must be hyperlinked to the **Reference Number** in the digital version of this tracker.
- **Independent Auditors** will verify 100% of the permits listed in this tracker during the Annual E&S Audit.

Annex 9: Sample MoU for Inter-Agency Coordination

BETWEEN: The **Federal Project Management Unit (FPMU)** / **State Project Implementation Unit (SPIU)** of the AGROW Project (The "Proponent") **AND:** The **Federal Ministry of Environment (FMEnv)** / **NESREA** / **State Environmental Protection Agency (SEPA)** (The "Regulator")

1. Purpose

This MoU defines the collaborative framework and timelines for the screening, scoping, review, and certification of Environmental and Social Impact Assessments (ESIAs) and other regulatory instruments required for the AGROW Project.

2. Scope of Cooperation

The Regulator agrees to prioritize the review of AGROW subprojects categorized as **High** or **Substantial** risk, while the Proponent agrees to provide high-quality documentation that meets both National and World Bank ESF standards.

3. Service Level Agreements (SLAs) – Processing Timelines

To prevent project delays, both parties agree to the following maximum turnaround times:

Activity / Milestone	SLA Timeline (Working Days)	Responsibility
Project Registration & Scoping	5 Days	Regulator
Review of Terms of Reference (ToR)	10 Days	Regulator
EIA Report Review (Draft)	21 Days	Regulator
Public Display Period	21 Days (Statutory)	Both
Issuance of Final EIS/Certificate	14 Days (Post-Display)	Regulator
Response to Regulatory Queries	7 Days	Proponent

4. Roles and Responsibilities

The Proponent (FPMU/SPIU) shall:

- Submit all E&S instruments via the **Safeguards Information System (SIS)** tracker for transparency.
- Fund the statutory administrative costs of field verification and monitoring.
- Appoint a dedicated **Liaison Officer** to coordinate with the Regulator.

The Regulator shall:

- Assign a technical "Green Team" to focus exclusively on AGROW project reviews.
- Participate in joint monitoring missions to avoid duplicating field visits.
- Provide technical guidance to consultants during the ESIA preparation phase.

5. Conflict Resolution

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In the event of a breach of the SLAs (e.g., a review takes longer than 21 days), the matter shall be escalated to the **National Project Steering Committee (NPSC)** and the Permanent Secretary of the respective Ministry for immediate intervention.

6. Duration and Amendment

This MoU shall remain in effect for the duration of the AGROW Project (expected 6 years) and may be reviewed annually to adjust SLAs based on performance data from the **SIS Dashboard**.

Signatories

For the FPMU/SPIU: Name: _____ Title: _____ Date: _____

For the Regulatory Body (FMEnv/NESREA/SEPA): Name: _____ Title: _____
Date: _____

Instructions for Implementation:

- **Customization:** Each State SPIU should adapt this template to reflect specific state-level agency names (e.g., KASEPA in Kano or LASEPA in Lagos).
- **Filing:** Once signed, a digital copy must be uploaded to the **SIS Permit Tracker** to serve as the baseline for performance monitoring.
- **Review:** The FPCU will use the "Date Submitted" vs. "Date Obtained" data in the **Annex B2 Tracker** to verify if these SLAs are being met.

Annex 10: Biodiversity and Cultural Heritage Screening Tool

1. Subproject Overview

- **Site Name/LGA:** _____ **Date:** _____
- **Total Land Area to be Impacted:** _____ (Hectares)
- **Current Land Cover:** Forest Savannah Wetland Farmland

2. Part A: Biodiversity & Natural Habitats (ESS6)

Note: This section identifies if the subproject could lead to significant conversion or degradation of natural or critical habitats.

No.	Screening Question	Yes	No	Observation / Evidence
2.1	Is the site located within a Protected Area (Forest Reserve, National Park)?			
2.2	Are there known endangered or endemic species on or near the site?			
2.3	Does the activity involve clearing more than 2 hectares of natural vegetation?			
2.4	Will the project affect water flow to a downstream wetland or swamp?			
2.5	Are there migratory bird corridors or "Important Bird Areas" (IBAs) nearby?			

Result A: If "Yes" to any of the above, a **Biodiversity Management Plan (BMP)** or an **Ecological Impact Assessment** is mandatory.

3. Part B: Cultural Heritage & "Chance Find" (ESS8)

Note: This section identifies physical or intangible cultural resources.

No.	Screening Question	Yes	No	Observation	/
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				Evidence
3.1	Are there visible graves, shrines, or sacred groves on the project site?			
3.2	Does the local community identify the site as having spiritual or historical value?			
3.3	Is the site near a UNESCO World Heritage site or National Monument?			
3.4	Will excavation exceed a depth of 2 meters?			

4. Mandatory "Chance Find" Procedure

Note: To be included in all Contractor bidding documents.

If any archaeological, paleontological, or historical resource (e.g., ancient pottery, bones, coins, or artifacts) is discovered during excavation, the following steps are **MANDATORY**:

1. **Stop Work:** Immediately cease all activities within a 50-meter radius of the find.
2. **Delineate:** Secure the area and prevent any removal or damage to the objects.
3. **Notify:** Inform the **SPIU Environmental Specialist** within 24 hours.
4. **Institutional Liaison:** The SPIU will contact the **National Commission for Museums and Monuments (NCMM)**.
5. **Resume Work:** Construction may only resume after the NCMM and World Bank provide a written "No Objection."

5. Surveyor Sign-Off

Screened By: _____ Signature: _____

(Environmental/Social Specialist)

Recommendation:

- Site Cleared for Development
- Move Site Location to Avoid Habitat/Heritage
- Proceed only with BMP/Cultural Heritage Management Plan

Instructions for Implementation:

- **Local Knowledge:** Part B **must** be completed through a walk-through with a community elder or traditional ruler.
- **Photos:** All shrines, old trees, or unique ecological features must be photographed and geo-tagged for the **SIS Dashboard**.
- **No-Go Zones:** If a site is determined to be a "Critical Habitat" or an irreplaceable cultural site, the SPIU must seek an alternative location for the subproject.

Annex 11: AGROW Project – Environmental & Social Screening Checklist (ESMF)

Purpose: Use this checklist to screen proposed AGROW activities for environmental and social risks, categorize risk (Low/Moderate/Substantial/High), and identify the required management instruments. Complete all sections, attach maps/photos, and record stakeholder inputs.

A. Project Information

Project title:

Component / sub-component:

Implementing unit (PIU/agency):

Contact person and phone/email:

Proposed start/end dates:

Location (State/LGA/Community; GPS if available):

Land ownership/status (public/private/customary):

Brief description of works/activities:

B. Stakeholder Engagement Summary

Key stakeholders consulted (community reps, women/youth groups, farmers, vulnerable persons, local authorities):

Date(s) of engagement and methods (meetings, FGDs, site walk):

Key concerns raised and how they will be addressed:

C. Screening Checklist

For each question, tick Yes/No and provide details. If Yes, describe scale, proximity, likelihood and proposed mitigation.

Topic	Screening Question	Yes/No	Details / Mitigation
C1. Land & Resettlement	Will the project require land acquisition, restrict		

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	access to land/resources, or cause physical/economic displacement? Risk of encroachment on farmland or grazing areas?		
C2. Biodiversity & Natural Habitats	Is the site within/adjacent to protected areas, forests, wetlands, watercourses, or critical habitats? Any endangered species present?		
C3. Water Resources	Will activities affect surface/groundwater quality/quantity (abstraction, discharge, irrigation return flows)? Risk of sedimentation/erosion?		
C4. Pollution & Waste	Generation of solid waste, agricultural inputs runoff, hazardous materials (fuels, pesticides), air/noise emissions? Existing contamination?		
C5. Soil & Erosion	Risk of soil degradation, erosion, salinization, or compaction from land clearing, heavy machinery, or irrigation practices?		
C6. Climate & Disaster Risk	Exposure to floods, droughts, heat waves? Will activities increase GHGs or climate vulnerability? Any resilience/adaptation features?		
C7. Cultural Heritage	Known/likely archaeological, cultural, sacred sites? Chance finds risk during excavation?		
C8. Labor & Working Conditions	Will the project engage direct/community workers or contractors? OHS risks (machinery, agrochemicals, traffic)? Presence of minors?		
C9. Community Health & Safety	Traffic/safety risks to nearby communities; vector-borne disease; waterborne disease; agrochemical exposure; emergency		

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	preparedness?		
C10. Gender, GBV/SEA/SH	Risk of gender-based violence, sexual exploitation/abuse, sexual harassment, or exclusion of women/vulnerable persons? Measures in place?		
C11. Security & Conflict Sensitivity	Context-specific security risks or local tensions (land use conflicts, pastoralist-farmer interface)? Need for security personnel?		
C12. Indigenous/Vulnerable Groups	Presence of vulnerable groups who may be disproportionately affected or excluded? Need for tailored engagement/support?		
C13. Cumulative/Transboundary	Could impacts cumulate with other projects or affect adjacent jurisdictions/watersheds?		
C14. Permits & Regulatory	Are national/state permits or approvals required (EIA, water abstraction, pesticide registration)? Status of compliance?		

D. Risk Categorization

Assign the overall risk rating based on likelihood, magnitude, sensitivity of receptors, and cumulative effects:

Low – Minimal, site-specific, reversible impacts; standard mitigation via ESMP.

Moderate – Manageable impacts of limited scale; targeted mitigation, ESMP; limited stakeholder sensitivity.

Substantial – Significant impacts, sensitive receptors or complex context; comprehensive ESMP/ESIA, robust stakeholder engagement.

High – Potentially severe, widespread, or irreversible impacts; ESIA required; may be ineligible if risks cannot be mitigated.

Proposed risk rating: [Low / Moderate / Substantial / High] Rationale: _____

E. Required E&S Instruments

- Environmental and Social Management Plan (ESMP)
- Environmental and Social Impact Assessment (ESIA)
- Resettlement Action Plan (RAP) or Abbreviated RAP (ARAP)
- Stakeholder Engagement Plan (SEP)
- Labor Management Procedures (LMP)
- GBV/SEA/SH Action Plan
- Community Health and Safety Plan (CHSP)
- Biodiversity Management Plan / Chance Finds Procedure

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[] Waste and Pollution Prevention Plan

[] Security Management Plan

[] Emergency Preparedness and Response Plan

F. Decision Rules & Next Steps

- If any of C1, C2, C7 involve sensitive receptors or significant magnitude, consider
- Substantial/High and commission ESIA.
- Any land acquisition or access restriction (C1) triggers RAP/ARAP and meaningful consultation.
- Identified GBV/SEA/SH risks (C10) require a GBV Action Plan and survivor-centered referral pathways.
- OHS/community safety risks (C8–C9) require CHSP and traffic management.
- Cultural heritage (C7) requires a Chance Finds Procedure and engagement with authorities.
- Ensure all permits (C14) are identified and obtained before works.

G. Sign-off

Screening completed by: _____ Date: _____

Reviewed by (E&S Specialist): _____ Date: _____

Approval (PIU/Agency): _____ Date: _____

Risk Scoring Guidance

Cod e	Topic	Screening Question	Weig ht	Likelihoo d (0-3)	Magnitu de (0-3)	Sensitivit y (0-3)	Score = W*(L+M+S)	Note s
C1	Land & Resettlement	Land acquisition/access restriction/displacement ?	3					
C2	Biodiversity & Habitats	Sensitive/critical habitats nearby?	3					
C3	Water Resources	Affect water quality/quantity?	2					
C4	Pollution & Waste	Hazardous materials/waste/emissions?	2					
C5	Soil & Erosion	Risk of soil degradation/erosion?	2					
C6	Climate & Disaster	High climate/extreme weather exposure?	2					
C7	Cultural Heritage	Known/likely cultural sites/chance finds?	2					
C8	Labor & OHS	Worker OHS risks/minors?	2					
C9	Community Safety	Traffic/vector/waterborne disease risks?	2					
C10	GBV/SEA/SH	GBV/SEA/SH risks or exclusion?	3					
C11	Security/Conflict	Security or conflict sensitivity concerns?	2					
C12	Vulnerable Groups	Impacts on vulnerable groups?	2					
C13	Cumulative/ Transboundary	Cumulative impacts or cross-border effects?	1					

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C14	Permits/Regulatory	Permits required/status?	1					
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Guidance:

Risk Rating	Total Score Range	Indicative Instruments
Low	0–12	ESMP
Moderate	13–24	ESMP + targeted plans
Substantial	25–36	ESIA + ESMP and plans
High	>36	ESIA; may be ineligible if risks cannot be mitigated

Annex 12: Master Environmental and Social Management Plan (ESMP) Template

1. Introduction

This template serves as the baseline for all site-specific ESMPs. It identifies common risks associated with agricultural value chain development and provides a menu of standard mitigation measures, monitoring indicators, and responsibilities.

2. Mitigation and Monitoring Matrix

Phase	Potential Risk / Impact	Mitigation Measures	Monitoring Indicator	Responsibility
Pre-Construction	Land Acquisition & Displacement	Conduct census/asset inventory; implement RAP; pay full compensation before work starts, ensure effective GM	% of PAPs compensated; signed closure forms.	SPIU Social Spec; LGC
Construction	Soil Erosion & Land Degradation	Re-vegetate exposed areas; install silt traps; avoid clearing during peak rainy season.	Evidence of siltation in nearby water bodies.	Contractor; Supervising Engineer
Construction	Occupational Health & Safety (OHS)	Provide mandatory PPE; conduct daily safety tool-box talks; maintain first-aid on site, ensure safe work environment and safety of workers	Number of accidents/near-misses reported.	Contractor HSE Officer
Operation	Pesticide Runoff & Water Pollution	Implement Integrated Pest Management (IPM); establish 50m buffer zones from water bodies.	Water quality readings (Nitrates/Phosphates).	SPIU Env Spec; Farmer Co-ops
Operation	Waste Generation	Implement "Circular Economy" waste sorting;	Volume of waste recycled vs. landfilled.	Hub Operator; SEPA

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	(Processing Hubs)	compost organic waste; safe disposal of haz-waste.		
Cross-Cutting	Gender-Based Violence (SEA/SH)	Mandatory Worker Code of Conduct; confidential reporting via GM; survivor-centered referrals.	% of workers signed CoC; GM log statistics.	SPIU Gender Officer

3. Monitoring and Reporting Frequency

To ensure the effectiveness of these measures, the following reporting schedule must be followed:

- **Weekly:** Site HSE inspections by the Contractor.
- **Monthly:** Verification by the Supervising Engineer and SPIU E&S Officers.
- **Quarterly:** Consolidated reports submitted to the FPCU and World Bank via the **Safeguards Information System (SIS)**.

4. Costing of Mitigation Measures

Contractors are required to provide a specific budget line item for the implementation of the **Contractor-ESMP (C-ESMP)**. This includes:

1. **PPE Procurement:** \$ _____
2. **Waste Management Services:** \$ _____
3. **HSE Personnel Salaries:** \$ _____
4. **Community Engagement/Signage:** \$ _____

5. Sign-Off and Commitment

Prepared By (SPIU Specialist): _____ **Date:** _____

Acknowledged By (Contractor PM): _____ **Date:** _____

Instructions for Implementation:

- **Site Specificity:** The "Mitigation Measures" column **must** be updated to reflect the specific geography of the site (e.g., if the site is on a slope, erosion measures must be intensified).
- **Contractual Obligation:** This table, once finalized for a subproject, must be annexed to the Contractor's legal contract.
- **Adaptive Management:** If a mitigation measure is found to be ineffective (e.g., silt traps are failing), the SPIU must issue a **Corrective Action Plan (CAP)** to update the ESMP within 48 hours.

Annex 13: Integrated Pest Management Plan (IPMP) Guidelines

1. The IPM Hierarchy (Preferred Approach)

Under the AGROW project, pest management must follow a hierarchical approach, prioritizing non-chemical methods before considering synthetic interventions.

Prevention/Cultural Control: Use of pest-resistant crop varieties, crop rotation, timely planting, and maintaining soil health.

Mechanical/Physical Control: Hand-picking of pests, use of traps (sticky/pheromone), and protective netting or mulching.

Biological Control: Conserving natural predators (e.g., ladybugs, parasitic wasps) and using botanical biopesticides (e.g., Neem extracts).

Chemical Control (Last Resort): Targeted application of approved low-toxicity pesticides only when "Economic Threshold Levels" are exceeded.

2. Pesticide Selection and Prohibited Substances

The project will NOT finance or allow the use of any pesticide products that fall under the following categories:

- **WHO Class Ia & Ib:** Extremely and highly hazardous technical formulations.
- **Persistent Organic Pollutants (POPs):** Substances prohibited under the Stockholm Convention (e.g., DDT, Lindane).
- **Non-Registered Products:** Any chemical not formally registered by NAFDAC for use in Nigeria.

3. Safe Handling and Application Protocols

When chemical application is necessary, the following safety protocols are mandatory for all farmers and contractors:

- **Personal Protective Equipment (PPE):** Applicators must wear chemical-resistant overalls, boots, gloves, and face masks/goggles.

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- **Weather Conditions:** Do not spray during high winds or immediately before rain to prevent chemical drift and runoff into water bodies.
- **Buffer Zones:** Maintain a minimum 50-meter "No-Spray" buffer zone from all rivers, wells, and residential areas.
- **Equipment Maintenance:** Ensure sprayers are calibrated and leak-free to prevent accidental spills.

4. Storage and Waste Management

- **Secure Storage:** Pesticides must be stored in original labeled containers, in a locked, well-ventilated cabinet, away from food, children, and livestock.
- **Triple-Rinse Method:** Empty containers must be triple-rinsed (adding the rinse water back into the sprayer), punctured to prevent reuse, and disposed of at designated hazardous waste collection points.
- **Spill Response:** Maintain sand or sawdust on-site at storage points to absorb accidental spills.

5. Capacity Building and Monitoring

- **Farmer Training:** All participating cooperatives must receive training on the "Green Label" system and IPM techniques before receiving inputs.
- **Field Monitoring:** SPIU Environmental Specialists will conduct unannounced field checks to verify PPE use and adherence to buffer zones.
- **IPM Scorecard:** A quarterly assessment of chemical vs. biological input usage will be recorded in the Safeguards Information System (SIS).

6. Sign-Off and Commitment

Prepared By (SPIU Specialist): _____ **Date:** _____

Lead Farmer/Co-op Representative: _____ **Date:** _____

Instructions for Implementation:

- **Procurement:** Procurement officers must verify that all seeds supplied are pest-resistant varieties to reduce the need for future chemical inputs.
- **Warning Signage:** During and after spraying, "No Entry" signs must be posted in the local language (e.g., Hausa, Yoruba, Igbo) to protect community members and livestock.

Annex 14: AGROW Project Pesticide Safety & IPM Field Brief

This brief is designed for AGROW Project Extension Officers to use during community training sessions. It fulfills the requirements of **ESS3 (Resource Efficiency and Pollution Prevention)** by promoting biological controls and the safe, minimal use of chemical pesticides.

1. What is Integrated Pest Management (IPM)?

IPM is a "Nature-First" approach. We only use chemicals as a **last resort**. The goal is to grow healthy crops with the least risk to your family and the environment.

The IPM Steps:

1. **Prevent:** Use healthy seeds, rotate crops, and keep fields clean.
2. **Monitor:** Check your crops weekly. Are the bugs "friends" (spiders, ladybugs) or "foes" (aphids, armyworms)?
3. **Intervene:** Use traps, hand-picking, or botanical sprays (like Neem) first.
4. **Control:** Only use approved chemicals if the damage is crossing a "danger line."

2. The "Red List": Prohibited Chemicals

The AGROW Project follows World Bank guidelines. **DO NOT** use pesticides that are:

- Extremely hazardous (WHO Class Ia and Ib).
- Banned by the Nigerian government (NAFDAC).
- Stored in unlabelled or "recycled" food/drink containers.

3. The Five Golden Rules of Pesticide Safety

Rule 1: Wear Your Protection (PPE)

Even if it is hot, you must protect your skin, eyes, and lungs.

- **Minimum gear:** Long sleeves, long trousers, rubber boots, gloves, and a face mask/shield.
- **Clean up:** Wash your PPE separately from your family's clothes.

Rule 2: Read the Label

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The color on the label tells you the danger:

- **Red:** Extremely Poisonous (Avoid if possible).
- **Yellow:** Highly Hazardous.
- **Blue/Green:** Less Hazardous (But still requires care).

Rule 3: Spray with the Wind

- Never spray when it is very windy or about to rain.
- Always spray **with the wind at your back** so the chemical blows away from you, not onto you.
- Keep children and animals out of the field for at least 24–48 hours after spraying.

Rule 4: Safe Storage

- Keep pesticides in a **locked box or cupboard** high off the ground.
- Keep them away from food, water, and out of reach of children.

Rule 5: Container Disposal (The Triple Rinse)

Never reuse a pesticide bottle for water or storage!

1. Empty the bottle into the sprayer.
2. Fill 1/4 with water, shake, and pour into the sprayer. **Do this 3 times.**
3. **Puncture or crush** the bottle so it cannot be used again.
4. Return to the project collection point or bury in a designated pit away from water.

4. Emergency Action for Poisoning

If someone feels dizzy, vomits, or has blurred vision after spraying:

1. **Move** them away from the field and the chemical immediately.
2. **Remove** contaminated clothing and wash skin with plenty of soap and water.
3. **Do not** give milk or oil. Give clean water only if they are conscious.
4. **Transport** to the nearest clinic and **bring the pesticide label** with you.

Instructions for Extension Workers:

- **Demonstration:** Don't just talk; show the farmers how to wear the mask and how to triple-rinse a bottle.
- **Traditional Knowledge:** Ask farmers about local plants they use to repel bugs (like Neem or Chili) and encourage these as "Step 3" interventions.
- **Language:** Use the local terms for "Poison" and "Safety" to ensure no confusion.

Annex 15: Pesticide Application & Usage Log

To ensure compliance with **World Bank ESS3** and the **AGROW Project's Integrated Pest Management Plan (IPMP)**, farmers must maintain an accurate record of all chemical applications. This log is essential for monitoring environmental safety, ensuring harvest intervals are respected, and providing data for project audits.

1. General Information

- **Farmer Name/ID:** _____
- **Farm Location/Plot Number:** _____
- **Crop Type:** _____ **Total Area Treated (Ha):** _____

2. Application Record Table

Date of Spray	Name of Pesticide/Product	WHO Class (Color)	Pest/Target (e.g., Armyworm)	Amount Used (Liters/Kg)	Weather Conditions	Pre-Harvest Interval (PHI)*
16-Jan-26	Example: Cypermethrin	Yellow	Aphids	250ml	Dry/Low Wind	14 Days

*PHI: The mandatory number of days between the last spray and the harvest (must be followed for food safety).

3. Safety & Disposal Checklist

Check "Yes" for each application:

- **PPE:** Did the operator wear a mask, gloves, and boots?
- **Wind:** Was the wind blowing away from the operator?
- **Triple Rinse:** Was the empty container rinsed 3 times and punctured?
- **Buffer Zone:** Was spraying kept at least 30 meters away from water bodies?

4. Observations & Notes

(Note any unusual occurrences, such as accidental spills, sudden rain after spraying, or observed impacts on non-target insects like bees).

5. Sign-Off & Verification

Farmer Signature: _____ **Date:** _____

Extension Officer Verification: _____ Date: _____

Instructions for Farmers and Extension Officers:

1. **Real-Time Logging:** Entries must be made on the **same day** as the application. Do not rely on memory at the end of the month.
2. **Harmful Chemicals:** If a farmer is found using **WHO Class Ia/Ib (Red Label)** pesticides, the Extension Officer must issue a non-compliance notice immediately and confiscate the product.
3. **Harvest Safety:** The **Pre-Harvest Interval (PHI)** is non-negotiable. Crops harvested before the PHI expires cannot be sold through AGROW-supported value chains.
4. **Data Sync:** Extension Officers should photograph these logs monthly and upload the data to the **AGROW Safeguards Information System (SIS)**.

Annex 16: Pesticide Storage and Disposal Site Audit Checklist

To ensure that the **AGROW Project** warehouses do not become sources of environmental contamination or health hazards, this audit checklist is used to evaluate storage facilities against **World Bank ESS3** and **International Code of Conduct on Pesticide Management** standards.

1. Warehouse Identification

- **Facility Name/Location:** _____
- **Warehouse Manager:** _____
- **Date of Audit:** _____ **Inspector:** _____
- **Type of Storage:** [] Main SPIU Hub [] LGA Distribution Center [] Cooperative Store

2. Facility Infrastructure & Security

No.	Inspection Item	Status (Pass/Fail)	Observations / Required Actions
1	Security: Is the store locked and access restricted to authorized staff?		
2	Signage: Are "Poison," "No Smoking," and "No Eating/Drinking" signs posted?		
3	Flooring: Is the floor non-porous (concrete) and free of cracks?		
4	Ventilation: Is there sufficient airflow to prevent vapor buildup?		
5	Bunding: Is there a sill/curb at the door to contain internal spills?		

3. Storage Practices

No.	Inspection Item	Status (Pass/Fail)	Observations / Required Actions
6	Separation: Are pesticides stored away from food, seeds, and fertilizers?		
7	Stacking: Are containers on pallets (not direct floor) and below shoulder height?		
8	Condition: Are all containers original, labeled, and leak-free?		

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9	Hazard Class: Are liquids stored below solids to prevent drip contamination?		
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4. Safety & Spill Management

No	Inspection Item	Status (Pass/Fail)	Observations / Required Actions
10	Spill Kit: Is there a kit with sand/sawdust, shovel, and brush available?		
11	PPE: Is there dedicated PPE for warehouse staff (gloves, apron, respirator)?		
12	Fire Safety: Are functional Dry Chemical Powder (DCP) extinguishers present?		
13	First Aid: Is there an eye-wash station or clean water available?		

5. Waste & Empty Container Management

- **Obsolete Stocks:** Are there any expired or unlabelled pesticides? [] Yes [] No
 - (If yes, move to the "Quarantine Zone" immediately).
- **Container Collection:** Is there a dedicated "Triple-Rinse" collection bin for returns? [] Yes [] No
- **Disposal Record:** Is there a log showing when waste was picked up by the licensed hazardous waste vendor? [] Yes [] No

[Image showing the correct labeling and segregation of expired pesticide stocks]

6. Auditor's Summary & Corrective Actions

- **Total Pass Score:** _____ / 13
- **Compliance Rating:** [] Satisfactory [] Needs Improvement [] Critical (Immediate Closure)

Required Corrective Actions:

1. _____
2. _____

7. Sign-Off

Warehouse Manager: _____ **Signature:** _____

SPIU Safeguards Officer: _____ **Date:** _____

Guidelines for Warehouse Managers:

- **The "First-In, First-Out" (FIFO) Rule:** Always issue older stock first to prevent chemical expiration.
- **Inventory Log:** Maintain a daily ledger of every bottle that enters and leaves the facility.
- **Proximity:** Never locate a pesticide warehouse within 50 meters of a school, hospital, or open water source.

Annex 17: SEA/SH Risk Assessment and Action Plan Template

1. Purpose

This tool is used by the **SPIU Gender/GBV Officer** to determine the level of SEA/SH risk associated with a specific subproject (e.g., a large irrigation site with a high labor influx) and to define mandatory prevention and response measures.

2. Part A: SEA/SH Risk Assessment Tool

Note: High scores in "Labor Influx" or "Remote Location" automatically trigger a "High" risk rating.

Risk Factor	Risk Level (1=Low, 5=High)	Observations / Specific Context
Labor Influx: Large number of male workers from outside the community.		
Project Location: Site is remote, isolated, or poorly lit.		
Community Vulnerability: High levels of poverty or displacement in host area.		
Engagement: Interaction between workers and local women/children is frequent.		
Security: Lack of female security or oversight personnel on-site.		
TOTAL SCORE	/25	Rating: 0-8 (Low); 9-16 (Moderate); 17+ (High)

3. Part B: SEA/SH Action Plan (Mitigation Measures)

Mitigation Measure	Responsibility	Timeline
Code of Conduct (CoC): Every worker signs a CoC prohibiting SEA/SH.	Contractor PM	Pre-Mobilization
Sensitization: Regular training for workers and community on SEA/SH risks.	SPIU Gender Officer	Monthly
Site Safety: Install adequate lighting, separate toilets, and secure fencing.	Contractor HSE	Construction Phase
Survivor-Centered GM: Establish confidential, female-led intake channels.	SPIU GM Officer	Continuous

Service Mapping: Identify and vet local GBV service providers (Health, Legal, Psycho-social).	SPIU Social Spec	Pre-Construction
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4. Part C: Survivor-Centered Referral Pathway

If an incident of SEA/SH is reported, the following **Survivor-Centered Pathway** must be followed immediately. The priority is the safety, confidentiality, and dignity of the survivor.

1. **Confidential Intake:** Report received by a trained Female Focal Point (via hotline or walk-in). No names are recorded in public logs.
2. **Consent & Needs Assessment:** Specialist determines immediate needs (Medical, Security, Emotional).
3. **Referral (Within 24 Hours):**
 - o **Medical:** Referral to a Sexual Assault Referral Centre (SARC) or hospital.
 - o **Legal/Police:** Only if the survivor explicitly consents.
 - o **Psychosocial:** Referral to specialized counseling NGOs.
4. **Project-Level Action:** The **SPIU** investigates the worker (not the survivor) and applies sanctions (dismissal, police handover) per the Code of Conduct.

5. Sign-Off and Accountability

Assessed By (SPIU Gender Officer): _____ **Date:** _____

Verified By (FPCU Lead): _____ **Date:** _____

Instructions for Implementation:

- **Confidentiality:** Never share the survivor's identity with the contractor or unauthorized project staff.
- **Non-Judgemental Approach:** Believe the survivor. Do not require "proof" (like a police report) to provide support services.
- **Monitoring:** The number of SEA/SH sensitization sessions and the percentage of workers who have signed the CoC must be reported in the **SIS Dashboard** quarterly.

Annex 18: SEA/SH Confidential Intake Form

Purpose: To ensure compliance with World Bank ESS4 and the project’s SEA/SH Action Plan, this form is designed as a survivor-centered intake tool. It prioritizes the safety, confidentiality, and dignity of the survivor. Unlike the general GM log, this form is not public and must be stored in a locked cabinet or on a password-protected drive accessible only by the Gender Officer or a designated female focal point.

1. Case Information (Confidential ID)

Note: To protect the survivor, do NOT record their name in any general log. Use a Unique Case Code.

- **Case ID Number:** (e.g., AG/SH/STATE/001) _____
- **Date of Intake:** _____ **Time:** _____
- **Location of Intake:** (Must be a private, safe space) _____
- **Mode of Reporting:** Hotline In-person Trusted third party

2. Consent for Information Sharing

- **Informed Consent:** Has the survivor been informed of the project’s confidentiality policy? Yes No
- **Limited Disclosure:** Does the survivor consent to share **non-identifiable** details with the SPIU for investigation? Yes No
- **Referral Consent:** Does the survivor consent to be referred to medical/legal/social services? Yes No

3. Incident Details (Non-Identifiable)

- **Date/Time of Incident:** _____
- **Location of Incident:** On-site Community Worker Camp Other: _____
- **Type of Incident:**
 - Sexual Exploitation (Exchange of project benefits for sex)
 - Sexual Abuse (Physical intrusion/assault)
 - Sexual Harassment (Unwelcome advances, comments, or gestures)
- **Alleged Perpetrator’s Affiliation:**
 - Contractor Employee SPIU Staff Security Personnel Other: _____

4. Immediate Needs & Referral Pathway

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Note: If the incident occurred within the last 72 hours, prioritize medical referral for Post-Exposure Prophylaxis (PEP).

Service Category	Referral Needed?	Name of Service Provider (Mapped)	Date of Referral
Medical/Health	<input type="checkbox"/> Yes <input type="checkbox"/> No		
Psychosocial/Counseling	<input type="checkbox"/> Yes <input type="checkbox"/> No		
Security/Protection	<input type="checkbox"/> Yes <input type="checkbox"/> No		
Legal/Justice	<input type="checkbox"/> Yes <input type="checkbox"/> No		

5. Incident Narrative (Survivor's Version)

Briefly describe the incident as told by the survivor. Avoid leading questions or judgmental language.

6. Case Management & Follow-Up

- **Immediate Safety Plan:** (e.g., survivor moved to safe house, perpetrator suspended from site)

- **Follow-Up Date:** _____ (Scheduled within 48 hours)

7. Verification & Sign-Off

Intake Officer (Female Focal Point): _____ **Signature:** _____

Survivor Signature (Optional/Fingerprint): _____ **Date:** _____

Mandatory Handling Guidelines:

1. **Strict Confidentiality:** Never discuss this case in open project meetings. Use the "Case ID" for all reporting to the FPCU and World Bank.
2. **Believe the Survivor:** The role of the Intake Officer is to provide support, not to "investigate" the truth of the claim.
3. **Data Security:** Physical forms must be kept in a double-locked cabinet. Digital files must be encrypted.
4. **No Police Mandatory Reporting:** In Nigeria, survivors should be encouraged to report to the police, but the project **cannot** report on their behalf without their explicit written consent.

Annex 19: SEA/SH Worker Code of Conduct & Acknowledgement Form

Purpose: To ensure the AGROW Project maintains a zero-tolerance policy toward Sexual Exploitation, Abuse, and Harassment, the following Worker Code of Conduct (CoC) is mandatory. Under World Bank ESS2 and ESS4, every individual employed by the project—including contractors, subcontractors, and consultants—must sign this form before they are granted access to any project site.

1. Core Principles of Conduct

As a worker on the AGROW Project, I understand that I represent the project and must uphold the highest standards of integrity. I agree to abide by the following rules:

1. **Zero Tolerance:** I will not engage in any form of Sexual Exploitation, Sexual Abuse, or Sexual Harassment (SEA/SH).
2. **No Sex for Favors:** I will not exchange money, employment, goods, or services for sex, nor will I promise project benefits in exchange for sexual favors.
3. **Prohibition of Child Abuse:** I will not have sexual relations with anyone under the age of 18, regardless of the local age of consent. Mistaken belief regarding age is not a defense.
4. **Respectful Interaction:** I will treat all community members, especially women and children, with respect and dignity.
5. **Duty to Report:** I will report any concerns or suspicions of SEA/SH through the project’s confidential Grievance Mechanism (GM).
6. **No Retaliation:** I will not threaten or retaliate against any person who reports a violation of this Code of Conduct.

2. Definitions

- **Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes.
- **Sexual Abuse:** Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Sexual Harassment:** Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature in the workplace.

3. Sanctions and Consequences

I understand that any violation of this Code of Conduct is a serious act of misconduct. If an investigation confirms that I have breached these rules, I will face disciplinary action, which may include:

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- Formal warning and mandatory retraining.
- Immediate suspension without pay.
- **Termination of employment** and permanent debarment from all World Bank-funded projects.
- Referral to the **Nigeria Police Force** for criminal prosecution in cases of physical assault or statutory rape.

4. Worker Acknowledgement

I, _____ (Full Name), confirm that I have attended the SEA/SH Sensitization Training provided by the Project. I have read (or have had read to me in a language I understand) and fully understand the requirements of this Code of Conduct.

- **Employer Name:** _____
- **Job Title/Role:** _____
- **Project Site/LGA:** _____
- **Worker ID Number:** _____
- **Date:** _____

Signature of Worker: _____ *(Or Thumbprint if non-literate)*

5. Management Verification

I confirm that the above-named worker has been briefed on the SEA/SH risks and the consequences of violating this Code of Conduct.

Contractor/Supervisor Name: _____ **Signature:** _____

SPIU Gender Officer (Verification): _____ **Date:** _____

Instructions for Implementation:

- **Language:** This form must be translated into the primary language of the workers (e.g., Hausa, Yoruba, Igbo) during the induction process.
- **Record Keeping:** Signed copies must be kept in the worker's personnel file on-site, and a scanned copy must be uploaded to the **Safeguards Information System (SIS)**.
- **Visibility:** Key rules from this Code of Conduct (e.g., "No Sex for Favors") must be printed on posters and displayed at all project sites and labor camps.

Annex 20: SEA/SH Community Sensitization Brief

Purpose: To ensure that the AGROW Project is safe for everyone, the community must be empowered to recognize and report misconduct. This Sensitization Brief is designed to be read aloud at town halls, distributed as a flyer, or used as a script for radio and town criers.

It translates the technical requirements of World Bank ESS4 into clear, actionable information for local residents.

1. Our Commitment to You

The AGROW Project is here to bring development, better farming, and prosperity to your community. We believe that **person should ever feel unsafe or be mistreated** by anyone working for this project.

Every worker—whether they are an engineer, a driver, a contractor, or a government official—has signed a **Code of Conduct** promising to treat you with respect.

2. What is Forbidden? (The "Red Lines")

Workers are strictly prohibited from the following behaviors. If you see or experience these, it is a violation of project rules:

- **Sex for Benefits:** A worker asking for sexual favors in exchange for including you in the project, giving you fertilizer, or hiring you for a job.
- **Sexual Abuse:** Any form of unwanted touching, physical force, or threats of a sexual nature.
- **Sexual Harassment:** Offensive comments about your body, unwanted sexual advances, or showing inappropriate pictures.
- **Relations with Minors:** Any sexual relationship between a worker and a child (anyone under 18), even if the child "consents." **This is a crime.**

3. Your Rights as a Community Member

1. **The Right to Say No:** You have the right to refuse any unwanted advance without losing your project benefits.
2. **The Right to Safety:** Project sites and offices must be safe spaces for women, men, and children.
3. **The Right to Report:** You have the right to report any worker who makes you feel unsafe or asks for sexual favors.
4. **The Right to Confidentiality:** If you report an incident, your identity will be protected. We will focus on the worker's behavior, not yours.

4. How to Report (Safe & Secret)

If a worker crosses a "Red Line," do not be silent. You can report safely through any of these channels:

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- **The Green Hotline:** Call or SMS [Insert Local Toll-Free Number]. This line is answered by a trained female specialist.
- **The Suggestion Box:** Drop a note in the locked box at the [Insert Location, e.g., Community Centre].
- **The Female Focal Point:** Speak privately to [Insert Name/Title], our community's designated safety officer.

5. What Happens After You Report?

- **We Listen:** We will listen to you without judgment.
- **We Support:** We will help you get medical care or counseling if needed.
- **We Act:** We will investigate the worker. If they are guilty, they will be **fired immediately** and may be handed over to the police.
- **You Stay Included:** Reporting an incident will **never** result in you being removed from the AGROW project.

Instructions for Extension Workers & SPIUs:

- **Translation:** This brief must be read in the local language (e.g., Hausa, Yoruba, Igbo, etc.).
- **Safe Spaces:** Always hold a separate session for women and girls only, led by a female facilitator, to allow them to speak freely.
- **Visual Aids:** Use posters with simple "Green" (Good) and "Red" (Bad) icons to illustrate acceptable and unacceptable behavior.
- **Repeat Often:** Sensitization is not a one-time event; it should happen at every community milestone.

Annex 21: Subproject Risk Classification Matrix

1. Risk Level Definitions

The **SPIU Environmental and Social Specialists** must assign one of the following four categories to every subproject based on the potential impacts and the borrower's capacity to manage them.

Risk Category	Definition of Impact	Required Safeguard Instruments
High	Potential significant adverse impacts that are diverse, irreversible, or unprecedented (e.g., large-scale dams, major land clearing in primary forests).	Full ESIA, RAP, LMP, SEP , and specialized Management Plans.
Substantial	Significant impacts but mostly site-specific and predictable; mitigation is readily available (e.g., large-scale irrigation, high-volume processing hubs).	ESIA/ESMP, RAP/ARAP, LMP, IPMP, SEP.
Moderate	Potential impacts are limited, site-specific, and not irreversible. Simple mitigation measures are sufficient (e.g., small-scale warehouse rehabilitation).	ESMP, OHS Guidelines, Simple GM.
Low	Minimal or no adverse environmental or social impacts (e.g., capacity building, provision of digital tools).	Good Practice Clauses in contracts.

2. The Scoring & Classification Matrix

Use this table to evaluate the subproject's risk profile across five key dimensions.

Risk Dimension	Low Risk (1 pt)	Moderate (2 pts)	Substantial (3 pts)	High (4 pts)
Scale of Activity	Household level.	Community/Ward level.	Local Govt (LGA) level.	State or Regional level.
Sensitive Locations	Fully degraded land.	Near residential areas.	Near water bodies/wetlands.	Within/Near Protected Areas.
Social Impacts	No land acquisition.	Small land donations.	Involuntary Resettlement.	Conflict-affected zones.
Labor Dynamics	Local community labor.	Small contractor crew.	Large labor influx (camp).	Complex migrant labor.
Environmental Footprint	No waste/emissions.	Minor construction waste.	Agrochemical usage.	Major habitat conversion.

3. Final Risk Assignment Logic

- **13–16 Points: Substantial Risk** (Requires detailed site-specific instruments).
- **8–12 Points: Moderate Risk** (Manageable via Standard ESMP).
- **5–7 Points: Low Risk** (Manageable via environment and social code of practice).

4. Key Considerations for AGROW Subprojects

- **Pesticide Use:** Any subproject promoting increased chemical usage automatically moves from "Low" to **Moderate or Substantial**, requiring an **IPMP**.
- **Physical Displacement:** Any subproject requiring the relocation of households is automatically **Substantial or High Risk**.
- **Vulnerable Groups:** If a subproject area includes high populations of IDPs or marginalized ethnic groups, the risk level must be adjusted upward to account for social exclusion risks.

5. Sign-Off

Screening Officer (SPIU): _____ Date: _____

Reviewed By (FPCU): _____ Date: _____

Classification Confirmed: High Substantial Moderate Low

Annex 22: Environmental and Social Screening Report (ESSR) Template

The Environmental and Social Screening Report (ESSR) is the formal document that summarizes the screening process. It serves as the "decision gate" for the project, providing the evidence base for the risk classification and defining exactly which E&S instruments must be prepared before any civil works or procurement can begin.

1. Subproject Identification

- **Subproject Name:** _____
- **Subproject ID:** _____ **Sector:** _____
- **Location: (State/LGA/Community)** _____
- **Project Component:** Infrastructure Value Chain Support Technical Assistance
- **Screening Date:** _____

2. Site Description & Physical Context

- **Current Land Use:** Agricultural Fallow Industrial Residential
- **Proximity to Sensitive Areas: (Distance in meters/km)**
 - **Natural Water Bodies:** _____
 - **Protected Forests/Habitats:** _____
 - **Schools/Hospitals/Religious Sites:** _____
- **Land Tenure Status:** Communal Private Government-Owned

3. Summary of Screening Results

Based on the Annex: Subproject Risk Classification Matrix.

Risk Dimension	Score (1-4)	Key Findings/Observations
Environmental Impacts		
Social Impacts & Resettlement		
Labor & Working Conditions		
Community Health & Safety		
Biodiversity & Heritage		
TOTAL SCORE	_____	FINAL CLASSIFICATION: <input type="checkbox"/> High <input type="checkbox"/> Substantial <input type="checkbox"/> Moderate <input type="checkbox"/> Low

4. Required E&S Management Instruments

Check all that apply based on the risk classification:

- Environmental and Social Impact Assessment (ESIA)
- Environmental and Social Management Plan (ESMP)
- Resettlement Action Plan (RAP) / Abbreviated RAP (ARAP)
- Integrated Pest Management Plan (IPMP)
- Stakeholder Engagement Plan (SEP)
- Labor Management Procedures (LMP)
- SEA/SH Action Plan

5. Site-Specific Observations & Recommendations

Provide a narrative of critical issues found during the site walk-through (e.g., "Site is prone to seasonal flooding," or "Presence of three artisanal shrines requiring relocation").

6. Institutional Responsibility & Budgeting

- Lead SPIU Officer: _____
- Estimated Budget for Instrument Preparation: _____
- Tentative Timeline for Instrument Completion: _____

7. Certification & Sign-Off

Prepared By (SPIU E&S Specialist):

Name: _____ Signature: _____ Date: _____

Reviewed By (FPCU Safeguards Lead):

Name: _____ Signature: _____ Date: _____

World Bank No-Objection (Required for High/Substantial Risk):

Granted Not Granted Conditional

Ref No: _____ Date: _____

Instructions for Filing:

- **Annexes:** Attach the completed Annex E1: Screening Checklist and the Annex: Risk Classification Matrix to this report.
- **Mapping:** Attach 3–4 geo-tagged photos of the site and a simple site layout map.
- **Digital Archive:** This document must be scanned and uploaded to the Safeguards Information System (SIS) as a "Milestone 1" document.

Annex 23: Monthly Site Inspection Checklist (Contractor Compliance)

1. Subproject & Inspection Details

- **Subproject Name/Contract ID:** _____
- **Contractor Name:** _____
- **Location/LGA:** _____ **Date of Inspection:** _____
- **Reporting Period:** [Month/Year] _____

2. Labor and Occupational Health & Safety (ESS2)

No.	Compliance Indicator	Status (S / NS / NA)*	Remarks / Corrective Actions Needed
2.1	PPE Usage: Are all workers using required gear (boots, helmets, vests)?		
2.2	Safety Signage: Are hazard warnings and "Deep Excavation" signs posted?		
2.3	First Aid: Is a stocked First Aid kit and trained medic available on-site?		
2.4	Drinking Water: Is clean, cool potable water available to all workers?		
2.5	Toolbox Talks: Are daily safety briefings being held and documented?		
2.6	Fire Safety: Are extinguishers present, serviced, and easily accessible?		

*S = Satisfactory; NS = Non-Satisfactory; NA = Not Applicable

3. Waste Management and Pollution Control (ESS3)

No.	Compliance Indicator	Status (S / NS / NA)	Remarks / Corrective Actions Needed
3.1	Waste Segregation: Are bins provided for plastic, organic, and hazardous waste?		
3.2	Spill Kits: Are sandbags or chemical spill kits available at fuel storage?		
3.3	Dust Suppression: Is water being sprayed on access roads during dry windy days?		
3.4	Sanitation: Are mobile toilets clean, functional, and		

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	separate for men/women?		
3.5	Erosion Control: Are silt fences or traps in place near water bodies?		

4. Social Management & Grievance Redress (ESS10)

No.	Compliance Indicator	Status (S / NS / NA)	Remarks / Corrective Actions Needed
4.1	GM Accessibility: Is the grievance box visible and the hotline number posted?		
4.2	Code of Conduct: Have all new workers signed the SEA/SH Code of Conduct?		
4.3	Labor Influx: Any unauthorized "camp followers" or child labor detected?		

5. Summary and Non-Compliance Scoring

- **Total "Satisfactory" Scores:** _____
- **Total "Non-Satisfactory" Scores:** _____
- **Compliance %:** (Total S / Total Applicable) x 100 = _____%

Critical Non-Compliance (Red Flags):

(List any life-threatening hazards or environmental breaches requiring immediate work stoppage)

1. _____

2. _____

6. Sign-Off and Validation

Inspected By (Supervising Engineer): _____ **Signature:** _____

Contractor Site Manager (Acknowledgement): _____ **Signature:** _____

SPIU E&S Specialist (Verification): _____ **Date:** _____

Instructions for Implementation:

- **Photographic Evidence:** The inspector **must** attach at least 5 geo-tagged photos to this checklist: one of the safety board, one of the waste area, and three of general site conditions.
- **Penalty Clause:** Scores below **70%** trigger a "Formal Warning." Two consecutive scores below 70% will result in a suspension of the monthly interim payment certificate (IPC).
- **The 48-Hour Rule:** All "NS" items must be rectified by the contractor within 48 hours and verified by the Supervising Engineer.

Annex 24: Occupational Health and Safety (OHS) Plan Template

In alignment with World Bank ESS2 and the AGROW Project ESMF, the Occupational Health and Safety (OHS) Plan is a mandatory operational document. It ensures that the contractor provides a safe working environment, identifies site-specific hazards, and implements a clear emergency response protocol.

1. Policy and Commitment

Project Name: _____

Contractor: _____

OHS Objective: To achieve "Zero Harm" through proactive hazard identification and strict adherence to safety protocols.

2. Hazard Identification and Risk Assessment (HIRA)

Before mobilization, the contractor must identify specific risks associated with the agricultural infrastructure works.

Activity	Potential Hazard	Risk Level (L/M/H)	Mitigation / Control Measure
Excavations	Trench collapse, falls	High	Shoring, barricades, and caution tape.
Machinery Ops	Struck by vehicle, noise	Medium	Flaggers, back-up alarms, earplugs.
Working at Height	Falls from scaffolding	High	Safety harnesses, guardrails, toe-boards.
Chemical Handling	Inhalation, skin burns	Medium	PPE (gloves/masks), specialized training.
Heavy Lifting	Back injuries, strain	Low	Mechanical lifts or "Team Lifting" rules.

3. Personal Protective Equipment (PPE) Matrix

The contractor is obligated to provide the following equipment to all staff at no cost.

Work Zone / Activity	Required PPE
General Site Area	Hard hat, High-visibility vest, Safety boots.
Welding / Grinding	Welding shield/goggles, Apron, Heat-resistant gloves.
Dusty Areas	N95 or equivalent dust mask.
Concrete Pouring	Rubber boots, waterproof gloves, eye protection.

4. Site Safety Protocols

- **Toolbox Talks:** Mandatory 10-minute briefings every morning to discuss the day's risks.

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- **Permit to Work (PTW):** Required for high-risk activities like working in confined spaces, hot work (welding), or working at heights above 2 meters.
- **Signage:** All hazards must be marked with universal safety signs in English and the dominant local language.

5. Emergency Preparedness and Response Plan (EPRP)

The site must be prepared for medical and environmental emergencies.

- **First Aid:** A fully stocked First Aid kit and a certified First Aider must be on-site at all times.
- **Muster Point:** A clearly marked, safe assembly area for workers in case of fire or site evacuation.
- **Emergency Contacts:** A list of the nearest hospital, fire station, and police post must be posted at the site entrance.

6. Incident Reporting and Investigation

All accidents, including "Near Misses," must be recorded.

- **Minor Injuries:** Logged in the Site Accident Book.
- **Serious Incidents:** Reported to the SPIU within 24 hours using Annex E3.
- **Root Cause Analysis (RCA):** Conducted after any serious event to prevent recurrence.

7. Health and Welfare Facilities

- **Drinking Water:** Potable, cool water must be provided (minimum 3 liters per worker/day).
- **Sanitation:** Clean, mobile toilets (1 per 15 workers), separated by gender.
- **Rest Area:** Shaded area for breaks and meals, away from dust and machinery.

8. OHS Sign-Off

Contractor HSE Officer: _____ **Date:** _____

Supervising Engineer (Approval): _____ **Date:** _____

Instructions for Implementation:

- **Training:** All workers must undergo an "OHS Induction" before their first shift.
- **Monitoring:** The Annex E2: Monthly Site Inspection Checklist will be used to score the contractor's performance against this plan.
- **Enforcement:** Failure to wear PPE is grounds for immediate removal from the site.

Annex 24: AGROW Project Top 10 Site Safety & Social Rules

This **One-Page Field Card** is designed as a "cheat sheet" for Site Foremen and Supervisors. It should be printed, laminated, and kept in the pockets of all site leadership or posted on the notice board at the site entrance. It translates the complex C-ESMP into 10 simple, non-negotiable rules.

“Safety First, Respect Always”

1. Wear Your PPE

No worker enters the site without a **Helmet, High-Viz Vest, and Safety Boots**. Use gloves and goggles when handling chemicals or welding. No exceptions.

2. Respect the Community

You are a guest. Do not engage in arguments with locals. No catcalling, no harassment, and no unauthorized entry into private farms.

3. Zero Tolerance for SEA/SH

Any worker who asks for sexual favors, harasses a community member, or has any sexual contact with a minor (under 18) will be **fired immediately** and handed over to the police.

4. No Children, No Forced Labor

No one under the age of 18 is allowed to work on this site. All workers must be here of their own free will and have a signed contract.

5. Manage Your Waste

Do not litter. Throw plastic and food waste in the bins. Hazardous waste (oils/batteries) must be kept in the **Bunded Area**. Never pour oil into the ground or water.

6. Report Accidents Immediately

If someone is hurt, or if there is a major chemical spill, tell the Foreman **NOW**. Every injury must be recorded, no matter how small.

7. Stay Safe Around Machinery

Keep a safe distance from moving excavators and trucks. Use **Flaggers** when moving heavy equipment near community roads or schools.

8. Clean Water & Sanitation

Every worker has the right to clean drinking water and clean toilets. Keep the toilets tidy. If the water runs out, tell the Site Manager immediately.

9. Use the Grievance Box

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If you have a problem with your pay, your safety, or your supervisor, use the **Worker Grievance Box**. You can report anonymously without fear of being fired.

10. Toolbox Talks are Mandatory

Every morning begins with a 5-minute safety briefing. Listen, ask questions, and make sure you know the risks for the day’s work.

EMERGENCY CONTACTS

- **Site Medic/First Aid:** [Insert Name / Phone]
- **Project Hotline:** [Insert Number]
- **Ambulance/Police:** [Insert Local Emergency Number]

How to Use This Card:

- **Language:** Ensure the Foreman can explain these rules in the local language (Hausa, Yoruba, Igbo, etc.) during the morning Toolbox Talk.
- **Visibility:** Post an enlarged version (A3 size) at the site gate and in the worker rest area.
- **Enforcement:** The Foreman should use this card to "Spot Check" workers during the day.

Annex 25: Hot Work Permit

In the context of the **AGROW Project**, "Hot Work" includes any activity that involves open flames or produces heat and sparks—such as welding, grinding, or torch cutting—particularly near grain silos, fuel storage, or wooden structures. This permit ensures that the contractor has taken all necessary precautions to prevent fires and explosions before work begins.

1. General Information

- **Permit Number:** _____ **Date:** _____
- **Subproject/Site:** _____
- **Specific Location of Work:** _____
- **Nature of Work:** Welding Grinding Cutting Soldering
- **Estimated Duration:** From (Time): _____ To (Time): _____

2. Fire Prevention Checklist

To be completed by the Contractor’s HSE Officer before authorization.

No.	Requirement	Yes	N/A	Remarks
1	Is the work area cleared of flammable materials/debris (11m radius)?			
2	Are non-removable combustibles protected with fire blankets?			
3	Are gas cylinders secured upright and fitted with flash-back arrestors?			
4	Has a 2.5kg Dry Chemical Powder (DCP) extinguisher been checked?			
5	Is a dedicated Fire Watch person assigned and trained?			
6	Are all floor and wall openings/cracks covered or sealed?			

3. Specialized Controls (If Applicable)

- **Confined Spaces:** If hot work is done in a confined space, is the **Confined Space Entry Permit** attached? Yes N/A
- **Atmospheric Testing:** (For work near fuel tanks) Is the area free of flammable vapors? Yes N/A

4. Personnel & PPE

- **Worker Name:** _____
- **Fire Watch Name:** _____
- **Mandatory PPE:** Welding Shield Leather Apron Long Gloves Safety Goggles

5. Authorization & Fire Watch

This permit is valid for the specified shift and location only.

HSE Officer / Authorized Issuer:

Name: _____ Signature: _____ Date: _____

Site Manager (Authorization):

Name: _____ Signature: _____ Date: _____

6. Post-Work Fire Watch Sign-Off

*A Fire Watch must remain at the site for **at least 30 minutes** after work is completed to check for smoldering fires or hot spots.*

- **Final Inspection Time:** _____ (30 mins after work stop)
- **Area Clear of Heat/Embers?** [] Yes [] No
- **Equipment Power Switched Off?** [] Yes [] No

Fire Watch Signature: _____ **Date:** _____

Mandatory Guidelines for Supervising Engineers:

- **Visual Confirmation:** The SE should periodically spot-check that the "Fire Watch" person is not performing other tasks while hot work is active.
- **Equipment Audit:** Ensure gas hoses are free of leaks and electrical cables are not frayed.
- **Weather Conditions:** In extremely dry or windy conditions (Harmattan), hot work in open fields may be restricted or require additional water barrels on standby.

Annex 26: Confined Space Entry Permit

For the **AGROW Project**, particularly during the construction of irrigation systems, grain silos, or deep sewage/manhole works, entering a confined space poses significant risks such as oxygen deficiency, toxic gases, or engulfment. In compliance with **World Bank ESS2** and the project **OHS Plan**, no worker is permitted to enter a confined space without a valid, signed **Confined Space Entry Permit**.

1. General Information

- **Permit Number:** _____ **Date:** _____
- **Subproject/Site:** _____
- **Specific Location of Entry:** (e.g., Silo 4, Manhole B) _____
- **Purpose of Entry:** _____
- **Estimated Duration:** From (Time): _____ To (Time): _____

2. Pre-Entry Atmospheric Testing

Testing must be performed by a qualified HSE Officer using a calibrated gas detector.

Parameter	Acceptable Range	Test Result	Status (Pass/Fail)
Oxygen (SO ₂)	19.5% – 23.5%		
Flammable (LEL)	< 10%		
Carbon Monoxide (CO)	< 35 ppm		
Hydrogen Sulfide (SH ₂)	< 10 ppm		

3. Safety Preparation Checklist

No.	Requirement	Yes	N/A	Remarks
1	Is the space isolated/locked out from power/fluids?			
2	Has the space been ventilated for at least 30 mins?			
3	Is a tripod/hoist and full-body harness available?			
4	Is a dedicated Entry Watcher (Attendant) posted?			
5	Is communication (radio/hand signals) established?			
6	Are intrinsically safe (explosion-proof) lights used?			

4. Authorized Personnel

- **Entrants (Workers entering the space):**
 1. _____
 2. _____
- **Attendant (Watcher staying outside):**

1.

5. Emergency Response Plan

- **Communication Method:** Radio Whistle Rope Signals
- **Rescue Equipment on Standby:** SCBA Extraction Cable Stretcher
- **Nearest Emergency Contact:** _____

6. Authorization and Sign-Off

This permit is valid ONLY for the shift and date specified above.

HSE Officer (Testing & Verification):

Name: _____ Signature: _____ Date: _____

Site Manager (Authorization):

Name: _____ Signature: _____ Date: _____

7. Close-Out (Work Completion)

- All personnel have exited the space? Yes
- All tools and equipment removed? Yes
- Space secured/closed? Yes

Attendant Signature: _____ **Time:** _____

Mandatory Guidelines for Supervising Engineers:

- **Zero Compromise:** If the gas detector fails or is not available, the permit **cannot** be issued.
- **The Attendant Rule:** The Attendant must never leave the entrance or enter the space to attempt a rescue; they must initiate the emergency protocol from the outside.
- **Records:** Completed permits must be filed at the site office and verified during the **Annex E2 Monthly Site Inspection**.

Annex 27: Weekly Toolbox Talk Schedule (Months 1–3)

This 12-Week Toolbox Talk (TBT) Schedule is designed to build a culture of safety and social responsibility from the first day of mobilization. Each topic should take no more than 10–15 minutes and should be delivered by the Site Foreman or HSE Officer before work begins.

Month 1: Foundation & Site Essentials

Goal: Establishing the "Golden Rules" and basic site requirements.

- **Week 1: Site Induction & The Code of Conduct**
 - **Focus:** Introduction to project goals, site boundaries, and the mandatory SEA/SH Code of Conduct (No harassment, no sex for favors).
 - **Action:** Ensure every worker knows the "Red Lines."
- **Week 2: Proper Use of PPE**
 - **Focus:** Why we wear helmets, boots, and vests. How to maintain and when to replace damaged gear.
 - **Action:** Inspect every worker's equipment for fit and quality.
- **Week 3: Housekeeping & Waste Management**
 - **Focus:** "A clean site is a safe site." Segregating food waste from construction debris. Preventing trip hazards.
 - **Action:** Designate specific waste bin areas.
- **Week 4: Emergency Procedures & First Aid**
 - **Focus:** What to do in a fire or medical emergency. Who is the site medic? Where is the muster point?
 - **Action:** Run a 5-minute "mock" evacuation drill.

Month 2: High-Risk Activity Controls

Goal: Focusing on physical hazards as construction intensity increases.

- **Week 5: Excavation & Trench Safety**
 - **Focus:** Shoring, battering, and barricading. Keeping soil piles away from the edge.
 - **Action:** Check that all open pits are marked with caution tape.
- **Week 6: Manual Handling & Lifting**
 - **Focus:** Correct lifting techniques to prevent back injuries. Team lifting for heavy loads.
 - **Action:** Demonstrate the "knees bent, back straight" technique.

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- **Week 7: Safe Handling of Chemicals & Fuel**
 - **Focus:** Storing fuel in bunded areas. Reading labels. Using funnels to prevent spills into the soil.
 - **Action:** Check the spill kit and ensure it is stocked with sand/absorbent mats.
- **Week 8: Tool & Machinery Safety**
 - **Focus:** Inspecting hand tools before use. Staying clear of the "blind spots" of excavators and trucks.
 - **Action:** "Tag-out" any broken tools or equipment immediately.

Month 3: Social Responsibility & Health

Goal: Managing the project's impact on the community and long-term worker health.

- **Week 9: Community Relations & Noise Control**
 - **Focus:** Being a good neighbor. Reducing noise near homes. No trespassing on private farms or property.
 - **Action:** Remind workers of the Community Grievance Hotline.
- **Week 10: Heat Stress & Hydration**
 - **Focus:** Recognizing signs of heat exhaustion. Importance of drinking clean water. Taking shade breaks during peak sun.
 - **Action:** Verify that cool, potable water is available at all work stations.
- **Week 11: Dust Control & Respiratory Health**
 - **Focus:** Using masks in dusty areas. Why we spray water on access roads. Protecting your lungs.
 - **Action:** Check the water truck schedule for the access roads.
- **Week 12: The Grievance Mechanism (GM)**
 - **Focus:** How to use the worker grievance box. Reporting unfair treatment or safety concerns without fear.
 - **Action:** Show the workers exactly where the suggestion box is located.

Instructions for the HSE Officer:

1. **Attendance:** Always use **Annex F3** (Attendance Log) to record who attended each talk.
2. **Engagement:** Don't just read. Ask a worker to demonstrate a safety move or repeat a rule.
3. **Documentation:** Take one photo of the TBT in progress each week to upload to the **Safeguards Information System (SIS)**.

Annex 28: Incident Notification and Reporting Form

1. General Information

- **Subproject Name/State:** _____
- **Incident Reference Number:** (Internal Log No.) _____
- **Date and Time of Incident:** _____
- **Location of Incident:** (GPS or Specific Site Name) _____

2. Incident Classification

Select the most appropriate category:

- **Fatality/Major Injury:** Death or permanent disability of a worker or community member.
- **SEA/SH:** Allegation of Sexual Exploitation, Abuse, or Harassment.
- **Major Environmental Spill:** Significant chemical or oil leak into a water body or soil.
- **Community Conflict:** Major protest or physical clash leading to project suspension.
- **Security Breach:** Armed robbery, kidnapping, or insurgent attack on site.

3. Initial Incident Description

Provide a concise summary of what happened (Who, What, Where, When):

4. Immediate Actions Taken

List the emergency measures implemented (e.g., medical evacuation, spill containment, police notification):

5. Casualty and Damage Report

- **Number of Injuries:** _____ (Attach list of victims if multiple)
- **Property/Equipment Damage:** None Minor Major
- **Environmental Remediation Required?** Yes No

6. Notification Timeline Tracker

Notification Level	Contact Person	Date & Time	Mode (Call/Email)
Contractor to SPIU			
SPIU to FPCU			
FPCU to World Bank			

7. Root Cause Analysis (RCA) & Corrective Action

Note: This section must be completed within 7 days of the incident.

- **Primary Cause:** (e.g., Failure of PPE, improper chemical storage, lack of training)

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- **Corrective Action Plan (CAP):**

- **Deadline for CAP Completion:** _____

8. Sign-Off

Reported By (Contractor/Site Manager): _____ **Date:** _____

Verified By (SPIU E&S Specialist): _____ **Date:** _____

Instructions for Implementation:

1. **Preserve the Scene:** In the event of a fatality or serious accident, all work at the specific location must stop immediately. Do not move equipment unless necessary to save life.
2. **Confidentiality:** If the incident involves **SEA/SH**, do *not* include the name of the survivor in this form. Use a unique case ID and follow the confidential referral pathway.
3. **Photo Evidence:** Attach clear photos of the incident site and any damaged safety equipment/controls.
4. **Close-Out:** The incident is only considered "Closed" when the FPCU E&S Lead verifies that all corrective actions have been fully implemented and documented in the **Safeguards Information System (SIS)**.

Annex 29: Capacity Needs Assessment Survey (SPIU Level)

1. Unit Identification

- **State:** _____
- **Department/Unit:** Environmental Social/Gender M&E Procurement
- **Total Number of Staff in E&S Unit:** _____
- **Respondent Name & Designation:** _____

2. Self-Assessment of ESF Competencies

Please rate your unit's current level of knowledge/experience for each World Bank Environmental and Social Standard (ESS) on a scale of 1–5 (1=No Knowledge, 5=Expert).

Standard / Competency Area	Knowledge Level (1–5)	Prior Experience with WB Projects? (Yes/No)
ESS1: E&S Risk Screening & Instrument Prep		
ESS2: Labor & Working Conditions (including Worker GM)		
ESS3: Pesticide Management (IPMP) & Waste Mgmt		
ESS4: Community Health, Safety & SEA/SH Prevention		
ESS5: Land Acquisition & Resettlement Planning (RAP)		
ESS10: Stakeholder Engagement & Public Disclosure		
Information Systems: Using the SIS Dashboard/GIS Tools		

3. Institutional Readiness & Infrastructure

No.	Indicator	Yes	No	Comments on Gaps
3.1	Does the unit have dedicated budget for E&S field monitoring?			
3.2	Are field officers equipped with laptops and GIS/GPS tools?			
3.3	Is there a functional State-level Grievance Redress Committee?			
3.4	Does the unit have access to environmental testing labs?			

4. Technical Training Priorities

Which of the following specialized topics are most urgently needed for your state? (Rank Top 3)

- Screening and Categorization of Subprojects
- Managing SEA/SH and GBV Referral Pathways
- Occupational Health and Safety (OHS) for Construction
- Biodiversity Screening and Chance Find Procedures
- Financial Management of Compensation (ESS5)

5. Resource Gaps & Challenges

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What are the primary barriers to effective ESMF implementation in your state? (e.g., lack of vehicles, security issues, late funding, lack of inter-agency cooperation)

6. Diagnostic Conclusion (To be completed by FPCU)

Assessed Risk Level of SPIU: [] High Need: Requires full-time technical assistance and immediate training.

[] Moderate Need: Requires specialized training on 1-2 specific ESS.

[] Low Need: Competent; requires periodic refresher and SIS data management training.

Recommended Action Plan:

Instructions for Implementation:

- **Baseline Survey:** This survey must be completed by every SPIU within the first 30 days of project effectiveness.
- **Validation:** The FPCU will validate these self-assessments through a series of "Diagnostic Interviews" and a review of previous project performance (if applicable).
- **Re-Assessment:** This tool should be re-administered annually to measure the effectiveness of the capacity-building program.

Annex 30: Training Attendance and Evaluation Log

Purpose: To ensure that the **AGROW Project** maintains a high standard of accountability for its capacity-building efforts, **Annex 20** provides a dual-purpose tool. This form tracks participation and measures the immediate effectiveness of training sessions provided to SPIU staff, contractors, and community members.

1. Session Metadata

- **Project Component:** _____
- **Training Module Title:** (e.g., Module 4: SEA/SH & GBV Prevention) _____
- **Date:** _____ **Venue:** _____
- **Lead Facilitator:** _____

2. Part A: Attendance Register

Note: This data must be disaggregated by gender and organization to track social inclusion targets.

No.	Full Name	Gender (M/F)	Organization/Affiliation (SPIU/Contractor/CBO)	Phone Number	Signature
1					
2					
3					
4					
5					

3. Part B: Post-Training Evaluation (Participant Feedback)

Please rate the following on a scale of 1–5 (1=Poor, 5=Excellent).

Evaluation Indicator	Rating (1–5)	Comments / Suggestions
Relevance: How useful is this topic to your daily project tasks?		
Clarity: Was the information presented in an easy-to-understand way?		
Materials: Quality of handouts, USSD guides, or visual aids.		
Facilitator: Knowledge and ability to answer questions.		
Overall Rating: How would you rate the training session overall?		

4. Part C: Knowledge Assessment (Learning Outcomes)

To be filled by the Facilitator based on Pre- and Post-test scores or group exercises.

- **Average Pre-Test Score:** _____ %
- **Average Post-Test Score:** _____ %
- **Knowledge Gain (%):** _____ %
- **Key Areas Requiring Further Coaching:**

5. Sign-Off and Validation

Lead Facilitator: _____ **Signature:** _____

SPIU Safeguard Officer (Observer): _____ **Date:** _____

Instructions for Implementation:

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- **Digital Capture:** A photo of the signed physical attendance sheet must be uploaded to the **Safeguards Information System (SIS)** within 24 hours of the session.
- **Inclusion Verification:** If the training target for women (40%) or youth (30%) is not met, the facilitator must provide a brief explanation and a corrective action plan for the next session.
- **Reporting:** Training statistics (Total Persons Trained, Disaggregated by Gender) are a mandatory indicator for the Project's Quarterly Performance Report to the World Bank.

Annex 31: Stakeholder Consultation Record Template

Purpose: To ensure the **AGROW Project** maintains a transparent and inclusive dialogue with all parties, **Annex 21** provides the official template for documenting every public consultation. In line with **World Bank ESS10**, this record is essential for verifying that community concerns—particularly those of women and vulnerable groups—have been heard and integrated into project design.

1. Session Metadata

- **Subproject Name/State:** _____
- **Location/Venue:** (e.g., Community Hall, Market Square) _____
- **Date & Time:** _____
- **Target Group(s):** General Community Women-only Group Youth Co-ops Farmers/PAPs
- **Language(s) Used:** _____

2. Participation Summary

Note: A detailed signed attendance list must be attached to this form (see Section 5).

Category	Number of Participants
Total Men	
Total Women	
Total Youth (18–35)	
Persons with Disabilities (PWDs)	
Traditional/Community Leaders	
TOTAL ATTENDEES	_____

3. Consultation Log (Concerns & Responses)

Document the specific questions asked by stakeholders and the official response provided by the Project Team.

No.	Key Concern / Question Raised	Raised By (Name/Group)	Project Team Response / Resolution
1			
2			
3			
4			

4. Key Outcomes & Agreed Actions

Summarize the consensus reached and any "Next Steps" promised to the community.

1. _____
2. _____
3. _____

5. Mandatory Attachments Checklist

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To be considered a valid record for the **Safeguards Information System (SIS)**, the following must be attached:

- **Signed Attendance Register:** Including name, gender, and contact info.
- **Photo Evidence:** At least 3 photos showing the venue and a diverse range of participants.
- **Minutes of Meeting:** A more detailed narrative of the proceedings.
- **Video/Audio Snippets:** (Optional but recommended for high-impact subprojects).

6. Sign-Off

Facilitator (SPIU/Social Specialist): _____ **Signature:** _____

Community Representative: _____ **Signature:** _____

Date Verified (FPCU): _____

Instructions for Implementation:

- **Inclusivity:** If fewer than 40% of participants are women, the facilitator must provide a reason (e.g., cultural norms) and describe what separate measures were taken to consult women privately.
- **Accessibility:** Ensure the venue is accessible to PWDs and that the timing does not conflict with major farming or domestic hours.
- **Closing the Loop:** The "Project Team Response" must be updated if a concern requires further technical investigation. The community must be informed of the final decision within 14 days.

Annex 32: Grievance Mechanism (GM) Logbook

In accordance with **World Bank ESS10**, this logbook serves as the primary administrative record for tracking the lifecycle of every complaint—from the moment of intake to the final verification of resolution.

1. Purpose and Scope

This logbook is maintained by the **Social Specialist** at the State Project Implementation Unit (SPIU) and the **Grievance Redress Committees (GRC)** at the local level. It captures all grievances related to land acquisition, environmental impacts, labor disputes, and project benefits.

2. The Central Grievance Registry

Case ID	Date Received	Complainant Name & Contact	Mode of Intake (Hotline, Box, Walk-in)	Category of Grievance (Land, Env, Labor, GBV*)	Description of Complaint	Current Status (Open/In-Progress/Closed)	Resolution Summary	Date Closed
AG/KN/001	12-Jan-26	Amina Musa (080...)	Walk-in	Land	Crop damage during irrigation piping.	Closed	Compensation paid via ARAP budget.	25-Jan-26
AG/KN/002	14-Jan-26	Anonymous	Hotline	GBV/SEA	Confidential (See SEA/SH Log)	In-Progress	Referred to SARC; Contractor notified.	--
AG/KN/003	16-Jan-26	John Doe (070...)	Suggestion Box	Labor	Late payment of wages by Contractor.	Open	Meeting scheduled with Site Manager.	--

3. Grievance Classification Guide

- **Tier 1 (Low):** Minor issues resolvable by the Site Supervisor within 3–7 days (e.g., dust nuisance).
- **Tier 2 (Moderate):** Issues requiring SPIU intervention within 14 days (e.g., compensation disputes).
- **Tier 3 (High):** Serious issues requiring FPCU or legal review (e.g., major land disputes or safety violations).
- **Sensitive Cases: SEA/SH and GBV** cases must be moved immediately to the confidential, survivor-centered log and handled by the Gender Officer.

4. Final Sign-Off and Satisfaction Verification

A grievance is only considered "Closed" when the complainant signs a **Satisfaction Form** or when the GRC provides evidence that all reasonable attempts at resolution were made.

Complainant Confirmation:

- Was the resolution satisfactory? [] Yes [] No
- Signature of Complainant: _____ Date: _____

GM Officer Verification:

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- Verified By: _____ Signature: _____

5. Reporting and Data Integration

- **Real-time Updates:** All entries in the physical logbook must be synced with the **AGROW Safeguards Information System (SIS)** digital dashboard weekly.
- **Trend Analysis:** The SPIU will analyze the logbook monthly to identify "Hotspot LGAs" with recurring complaints for targeted management intervention.
- **World Bank Oversight:** A summary of the GM Log (number of cases received vs. resolved) must be included in every Quarterly Progress Report.

Instructions for Implementation:

1. **Accessibility:** Ensure the physical logbook is kept in a secure but accessible location at the GRC desk.
2. **Confidentiality:** Do not share complainant contact details with contractors or third parties without explicit consent.
3. **No-Retaliation Policy:** Post signs in local languages clearly stating that filing a grievance will not lead to project exclusion or retaliation.

Annex 33: Sample Public Disclosure Notice

Purpose: To finalize the transparency requirements of the **AGROW Project** under **World Bank ESS10, Annex 23** provides the template for public disclosure. This notice is a legal requirement that ensures stakeholders are aware of the potential impacts of a subproject and have the opportunity to review the proposed mitigation plans (ESIA, ESMP, or RAP) before they are finalized.

1. Instructions for the SPIU

- **Duration:** The notice must be posted for a minimum of **21 days** for ESIA/RAPs and **14 days** for ESMPs.
- **Locations:** Notices must be placed at the State Ministry of Agriculture, the Local Government Secretariat, the Traditional Ruler's Palace, and the project site.
- **Language:** This template **must** be translated into the dominant local language (e.g., Hausa, Yoruba, Igbo, or Fulfulde) and posted alongside the English version.

2. Template for Public Disclosure

FEDERAL MINISTRY OF AGRICULTURE AND FOOD SECURITY (FMAFS)
NIGERIA SUSTAINABLE AGRICULTURE VALUE CHAINS FOR GROWTH (AGROW) PROJECT
NOTICE OF PUBLIC DISCLOSURE
ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) / RESETTLEMENT ACTION PLAN
(RAP)

Project Title: [Insert Subproject Name, e.g., Construction of Barkin Ladi Aggregation Hub]

Location: [Insert LGA and State]

Notice is hereby given to the general public, Project-Affected Persons (PAPs), and interested stakeholders that the Environmental and Social management instruments for the above-mentioned subproject have been prepared in accordance with the World Bank Environmental and Social Framework (ESF) and Nigerian Environmental Laws.

Project Brief:

[Insert 2-3 sentences describing the activity, e.g., "The project involves the construction of a 5,000-ton grain storage facility and 2km of access road to support smallholder farmers in the region."]

Potential Impacts Identified:

- [e.g., Temporary dust and noise during construction.]
- [e.g., Economic displacement of 12 farmers due to site clearing.]
- [e.g., Increased water demand for processing.]

Review Locations:

The full reports are available for public review and comments at the following locations:

1. **State PIU Office:** [Insert Physical Address]
2. **LGA Secretariat:** [Insert Address]
3. **Traditional Ruler's Palace:** [Insert Name of Palace]
4. **Project Website:** [Insert URL, e.g., www.agrow-nigeria.gov.ng/disclosure]

Submission of Comments:

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All comments, suggestions, or objections regarding the proposed subproject should be submitted in writing or via the channels below within [21/14] days of this notice.

- **Contact Person:** [Insert Name of SPIU Social Specialist]
- **Phone/WhatsApp:** [Insert Number]
- **Email:** [Insert Email Address]
- **Grievance Box:** Located at the [Insert Location]

Date of Posting: [Insert Date]

Closing Date for Comments: [Insert Date]

3. Disclosure Verification Log

The **SPIU Social Specialist** must document the disclosure process for the **Safeguards Information System (SIS)** using the table below:

Location of Posting	Date Posted	Evidence Captured (Photo/Video)	Local Language Used
LGA Secretariat		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Market Square		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Radio Announcement		<input type="checkbox"/> Yes <input type="checkbox"/> No	

4. Radio/Town Crier Script (Oral Disclosure)

For communities with low literacy rates, the following script should be used for radio jingles or town criers:

"Attention residents of [Community Name]! The AGROW Project is planning to build [Subproject]. We have written a report on how this will affect our land and water. You can see this report at the Chairman's office. If you have any concerns, please speak to your community leader or call [Phone Number] before [Closing Date]. Your voice matters!"

Annex 34: Standard E&S Clauses for Bidding & Contract Documents

To ensure that the environmental and social commitments made in the **ESIA/ESMP** are legally binding, these **Standard E&S Clauses** must be integrated into the Particular Conditions of Contract (PCC) and the Bill of Quantities (BoQ) of all bidding documents for the **AGROW Project**.

Without these clauses, the SPIU has no legal basis to penalize contractors for E&S non-compliance or to withhold payments for safety failures.

1. General Obligations

The Contractor shall carry out the works in accordance with the **Environmental and Social Management Plan (ESMP)** and the **World Bank Environmental and Social Framework (ESF)**. The Contractor shall:

- Prepare a detailed **Contractor-ESMP (C-ESMP)** within 30 days of contract signature for SPIU approval.
- Appoint a qualified **Environmental, Health, and Safety (EHS) Officer** and a **Social/Community Liaison Officer** to be stationed at the site full-time.

2. Occupational Health and Safety (OHS)

- **PPE Provision:** The Contractor shall provide, at no cost to the workers, all necessary Personal Protective Equipment (PPE) including helmets, safety boots, high-visibility vests, gloves, and eye protection.
- **Safety Briefings:** The Contractor shall conduct daily "Toolbox Talks" on safety risks before work begins.
- **Accident Reporting:** Any "Serious" or "Critical" incident must be reported to the SPIU within **24 hours** using the **Annex E3 Incident Form**.

3. Labor and Working Conditions

- **Child Labor:** The Contractor shall not employ any person under the age of 18.
- **Forced Labor:** All labor must be voluntary. The Contractor shall not withhold worker identity documents or wages.
- **Worker GM:** The Contractor must establish a dedicated grievance mechanism for workers to report labor disputes or safety concerns without fear of retaliation.
- **Wages and Hours:** The Contractor shall comply with Nigerian National Labor Laws regarding minimum wage, overtime, and working hours.

4. SEA/SH and Gender-Based Violence

- **Code of Conduct (CoC):** Every worker and subcontractor must sign the **SEA/SH Code of Conduct** before being allowed on site.
- **Sanctions:** The Contractor shall immediately suspend any worker accused of Sexual Exploitation, Abuse, or Harassment pending a full investigation.
- **Separate Facilities:** The Contractor shall provide separate, secure, and clearly marked latrines and changing rooms for male and female workers.

5. Environmental Protection & Pollution Control

- **Waste Management:** The Contractor shall segregate waste and dispose of hazardous materials (oils, chemicals) only at government-approved sites.
- **Spill Prevention:** All fuel storage areas must be bunded with a concrete or plastic liner to prevent soil and water contamination.

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- **Dust and Noise:** The Contractor shall implement water spraying for dust suppression and limit high-noise activities to between 08:00 AM and 05:00 PM.

6. Penalty and Non-Compliance Clauses

- **Withholding of Payment:** The Supervising Engineer is authorized to withhold **up to 10% of the Monthly Interim Payment Certificate (IPC)** if the Contractor fails to rectify a "Satisfactory" rating in the **Annex E2 Inspection Checklist** within 48 hours.
- **Termination:** Persistent failure to comply with E&S requirements, or a single "Critical" incident caused by gross negligence, shall be grounds for contract termination.

7. Financial Provisions (BoQ Items)

The Bidder must include specific, priced items in the Bill of Quantities for:

1. **C-ESMP Preparation and Updates.**
2. **HSE/Social Staff Salaries.**
3. **PPE Procurement and Replacement.**
4. **Waste Management and Site Remediation.**
5. **Community Sensitization and GM Setup.**

Sign-Off and Commitment

Bidder's Authorized Representative: _____ **Date:** _____

Signature & Official Stamp: _____

Instructions for Procurement Officers:

- **Pre-Bid Meeting:** These E&S clauses must be explicitly explained during the pre-bid meeting so that contractors factor the costs into their financial proposals.
- **Evaluation:** Any bid that fails to include a signed **Code of Conduct** or does not price E&S items in the BoQ should be considered **non-responsive**.

Annex 35: Guide - Evaluating E&S Capacity in Contractor Bids

To ensure that the **AGROW Project** selects contractors who are truly capable of managing environmental and social risks—rather than just those who submit the lowest price—the Procurement Team must use a **Technical Evaluation Weighting** system.

Under the **World Bank Procurement Regulations**, "Most Advantageous Bid" (MAB) selection allows for E&S capacity to be a significant factor in the award decision.

1. The "Pass/Fail" Gateway (Preliminary Evaluation)

Before a bid is scored technically, it must pass these mandatory E&S hurdles. If any of these are missing, the bid is **Non-Responsive**.

- **Signed SEA/SH Code of Conduct:** A commitment signed by the firm’s Managing Director.
- **EHS Policy Statement:** A corporate policy signed by senior management.
- **Litigation History:** No record of major environmental fines or human rights violations in the last 3 years.
- **BoQ Pricing:** Explicit line items for PPE, Waste Management, and E&S staffing must be priced (not "included in general overheads").

2. Technical Scoring Matrix (E&S Competency)

Bids that pass the preliminary stage should be scored against the following 100-point E&S matrix (this usually accounts for 20-30% of the total technical score).

Evaluation Criteria	Scoring Logic	Max Points
Past Performance	Evidence of successfully implementing an ESMP/C-ESMP on a similar World Bank or international project.	25
Staffing Plan	CVs of a dedicated HSE Officer (NEBOSH/OSHA certified) and a Social Specialist with experience in community GM.	25
Draft C-ESMP Method Statement	A site-specific plan showing they understand the risks of <i>this</i> project (e.g., specific plans for dust, pesticide storage, or labor influx).	30
Emergency Response	Procedures for handling spills, medical emergencies, and security incidents (including 24-hour reporting).	10
Equipment & Tools	List of spill kits, PPE stock, first aid equipment, and safety signage the contractor already owns.	10

3. Red Flags to Watch For

The Procurement Committee should be wary of bids that show:

- **"Copy-Paste" Method Statements:** The plan mentions "bridge construction" when the subproject is a "warehouse rehabilitation."
- **Under-pricing E&S:** If the cost for PPE and safety is suspiciously low, the contractor will likely cut corners on-site.
- **Shared Personnel:** CVs that show the same HSE officer is working on three other active projects simultaneously.

4. Interviewing the Contractor's E&S Team

For "High" or "Substantial" risk projects, the FPCU should interview the proposed site EHS Officer. Key questions include:

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1. *"How would you handle a situation where a worker is caught not wearing PPE after three warnings?"*
2. *"If a community member complains that construction dust is ruining their crops, what is your immediate step?"*
3. *"Describe the process you would follow if an accidental oil spill occurs near a local stream."*

5. Final Selection Recommendation

The Evaluation Report must include a specific section on E&S findings.

Example Finding: *"While Bidder A was the lowest price, they failed to provide a qualified Social Specialist and their waste management plan was generic. Bidder B, though 5% more expensive, demonstrated superior OHS systems and has a proven track record of managing labor influx in rural Nigeria. Bidder B is recommended as the Most Advantageous Bid."*

Instructions for the Procurement Unit:

- **Joint Review:** The Evaluation Committee **must** include at least one member of the SPIU Environmental or Social team to score the E&S section.
- **Contract Integration:** The winning bidder's Method Statement and Staffing Plan must be annexed to the final contract to prevent "bait and switch" (replacing good staff with unqualified ones after the award).

Annex 36: Pre-Mobilization E&S Kick-off Meeting Agenda

The Pre-Mobilization E&S Kick-off Meeting is the most critical intervention before boots hit the ground. It transitions the E&S requirements from "legal clauses in a contract" to "operational reality on the site."

The goal of this meeting is to ensure the Contractor's management and site teams fully understand that E&S performance is as important as physical progress.

Project Name: AGROW Sustainable Value Chains

Subproject: [Insert Site Name]

Date/Time: [Insert Date]

Location: [SPIU Office / Virtual]

1. Attendance & Introductions

- **Mandatory Attendees:** SPIU Project Coordinator, SPIU E&S Specialists, Supervising Engineer, Contractor's Project Manager, Contractor's HSE/Social Officers.
- **Goal:** Establish clear lines of communication between the SPIU and the Contractor's E&S team.

2. Review of Contractual E&S Obligations

- Review of the **ESMP** and specific **PCC** clauses.
- Discussion of the **C-ESMP** submission timeline (Due 30 days post-award).
- **Budget Check:** Confirm that BoQ items for E&S (PPE, waste, staff) are fully understood and ready for deployment.

3. Site-Specific Risk Briefing

- SPIU presents the "Red Flags" identified in the **Environmental and Social Screening Report (ESSR)**.
 - *Example:* Presence of local shrines, nearby wetlands, or known land disputes.
- Contractor presents their initial **Method Statement** for high-risk activities (e.g., land clearing or fuel storage).

4. Operationalizing Social Safeguards

- **Labor Management:** Review of the **Labor Management Procedure (LMP)**.
 - Requirement for worker contracts and insurance.
 - Setup of the **Worker Grievance Mechanism**.
- **SEA/SH Prevention:** * Submission of the signed **Codes of Conduct (CoC)** for all mobilized staff.
 - Scheduling the first **Community Sensitization** meeting.

5. Incident Reporting & Monitoring Protocols

- Review of **Annex E3: Incident Notification Form** (the 24-hour reporting rule).
- Agreement on the schedule for **Monthly Joint Inspections** using **Annex E2**.
- Introduction to the **Safeguards Information System (SIS)** digital upload requirements.

6. The "Stop Work" Authority

- Formal notification to the Contractor that the **Supervising Engineer** and **SPIU E&S Officers** have the authority to halt works immediately in the event of:
 - Imminent danger to life (OHS failure).
 - Major environmental pollution (e.g., untreated discharge into a river).

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- Evidence of child labor or sexual misconduct.

7. Action Items & Next Steps

- Date for joint site walk-through to finalize the "Limit of Works."
- Deadline for Contractor to install the **Project Signboard** and **GM Suggestion Boxes**.

Pre-Mobilization Milestone Checklist (The "Green Light")

The Contractor is **NOT** cleared for full mobilization until the following are verified:

- HSE and Social Officers are physically present and vetted.
- Full stock of PPE is on-site or in the local warehouse.
- Initial Community Sensitization meeting has been held and documented.
- First aid kits and emergency contacts are posted at the site office.

Sign-Off

SPIU Project Coordinator: _____ **Signature:** _____

Contractor Project Manager: _____ **Signature:** _____

Supervising Engineer: _____ **Date:** _____

Annex 37: Environmental & Social (E&S) Section for Bidding Documents

Section X — Environmental & Social Requirements

X.1 Purpose and Applicability

These requirements apply to all Lots and all contractors, subcontractors, and service providers engaged under the AGROW Project. Compliance is a material contractual obligation and a condition of payment.

X.2 Governing Framework

Contractors shall comply with:

- Nigeria’s applicable **environmental, labor, health, and safety laws** and regulations.
- The **World Bank Environmental and Social Framework (ESF)** and relevant **Environmental, Health and Safety (EHS) Guidelines**.
- The Project’s approved **ESIA/ESMP/RAP, ESMF, and ESCP**, and any FPCU/SPIU instructions or permits issued by **FMEV/SEPA**.

X.3 Core Contractor Obligations

1. C-ESMP Preparation and Implementation

Prepare a Contractor Environmental & Social Management Plan (C-ESMP) aligned with approved ESMPs and this Section; submit for FPCU/SPIU review and **No Objection** prior to mobilization; implement throughout the contract.

2. Qualified E&S Staffing (Minimum On-Site)

- **E&S Manager** (overall lead; 7+ years experience; degree in environmental/social sciences).
- **OHS Officer** (NEBOSH/ISPON or equivalent; 5+ years).
- **Environmental Officer** (waste, pollution, permits).
- **Social/GBV Specialist** (SEA/SH risk management; survivor-centered referrals).
- **Community Liaison/GM Focal Point**.
- **Traffic & Road Safety Officer** (where relevant).

3. Codes of Conduct (CoC)

Mandatory signing by all workers (including security personnel and sub-contractors) covering **SEA/SH, GBV, Violence Against Children (VAC)**, anti-harassment, respectful behavior toward communities, and consequences for violations. Enforce through induction, refreshers, supervision, and sanctions.

4. Occupational Health & Safety (OHS)

Implement an OHS Plan addressing: hazard identification, PPE, safe work procedures, hot-work permits, lock-out/tag-out, lifting operations, confined spaces, electrical safety, ergonomics, heat stress, first aid, emergency preparedness, drills, and incident investigation. Maintain site fencing, signage, traffic control, and community safety measures.

5. Labor Management

Comply with ESS2 obligations: fair contracts and wages, working hours, prohibition of child/forced labor, non-discrimination, worker GM, and minimum standards for worker accommodation (if applicable).

6. Community Health, Safety, and Security (ESS4)

Traffic Management, dust/noise suppression, vector control, communicable disease prevention, water/soil protection, and any **security arrangements** consistent with proportionality and CoC.

7. Resource Efficiency & Pollution Prevention (ESS3)

Waste segregation and licensed disposal, spill prevention/response, wastewater management, emissions/noise control, materials sourcing, and energy/water efficiency.

8. Biodiversity & Cultural Heritage (ESS6/ESS8)

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Avoidance/minimization of habitat impacts; restoration where applicable. Implement **Chance Finds Procedure** for cultural heritage; stop work and notify authorities per Annex E.

9. Stakeholder Engagement & GM (ESS10)

Support project SEP; maintain site-level GM accessible to workers and communities; record and resolve grievances in a timely, confidential way; escalate SEA/SH cases using survivor-centered pathways and trained GBV service providers.

10. Permits and Regulatory Liaison

Obtain and maintain all required FMEEnv/SEPA permits; allow inspections.

11. Monitoring, Reporting, and Notification

- Daily HSE checks; weekly toolbox talks; monthly E&S reports (Annex D).
- **Immediate (within 24 hours)** notification to SPIU/FPCU for fatalities, serious injuries, significant spills, or community incidents using Incident Form (Annex C); submit full investigation within 7 calendar days.
- Maintain records of **incidents, near misses, training, grievances, and monitoring data**.

12. Performance, Remedies, and Sanctions

- E&S KPIs will be tracked (Annex J).
- Non-compliance may lead to **withholding of payments, liquidated damages, suspension, or termination**; repeated or severe breaches (e.g., SEA/SH violation, fatality due to negligence, falsified records) may trigger contract termination and debarment recommendations.

Section Y — Bid Submission Requirements (E&S)

Bidders shall submit the following with their technical proposal (non-price):

1. **E&S Method Statement (≤20 pages)** describing how the bidder will meet X.3 obligations, site risks, and mitigation approach.
2. **Outline C-ESMP** structured per Annex A (10–15 pages).
3. **OHS Plan (outline)** per Annex G, including emergency response and drills.
4. **GBV/SEA/SH Action Plan** per Annex H, including CoC enforcement, training schedule, confidential reporting channels, and MoU/LoI with local GBV service provider(s).
5. **Stakeholder Engagement & Site-level GM** outline with sample forms and escalation steps (Annex F).
6. **Traffic Management Plan** (where relevant) per Annex I.
7. **Key E&S Personnel:** CVs, roles, certifications, availability, and organization chart.
8. **Past Performance Evidence:** at least **3 projects in the last 5 years** of similar scope; provide contacts and outcome summaries; include OHS statistics (e.g., **LTIFR/TRIR**), regulatory notices, and audit results.
9. **Training Plan & Budget** for worker induction, toolbox talks, OHS competencies, and SEA/SH/GBV awareness.
10. **Equipment & PPE List** and maintenance/calibration program.
11. **Compliance Statement** confirming acceptance of Section X clauses, access for independent monitors, and consent to sanctions.

Mandatory Pass/Fail Items: submission of signed **Bidder E&S Compliance Statement**, GBV/SEA/SH Action Plan with CoC samples, and CVs for E&S Manager and OHS Officer. Failure to submit = **automatic disqualification**.

Section Z — E&S Evaluation Criteria and Scoring

Total: **100 points** (minimum qualifying technical score: **70**; E&S sub-minimum: **45**).

Criterion	Points	What “Excellent” Looks Like
E&S Method Statement	20	Risk-based, site-specific, measurable controls, aligns to ESMP/ESMF, clear

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quality		sequencing and supervision.
Outline C-ESMP	15	Complete per Annex A; monitoring plan with parameters/frequency; resources and budget identified.
OHS Plan	12	Detailed hazard analyses (JHA), emergency response matrix, drill schedule, competency tracking, leading/lagging indicators.
GBV/SEA/SH Action Plan + CoC	12	Survivor-centered pathways, trained focal points, partnerships with service providers, confidential reporting, enforcement and sanctions.
Stakeholder Engagement & GM	8	Accessible channels, timelines, integration with project GM, community liaison plan, inclusion measures for vulnerable groups.
Traffic & Community Safety	8	Route risk assessment, signage, marshals, speed controls, crash response, community safeguards.
E&S Staffing & Qualifications	15	Full team per X.3 with strong CVs, clear availability, organogram, training plan.
Past Performance & OHS Metrics	10	Demonstrated compliance history, low LTIFR/TRIR, positive references, audit reports.

Note: The Client reserves the right to conduct due diligence (reference checks, interviews) and to treat materially misleading E&S claims as grounds for rejection.

Special Conditions of Contract — E&S (extracts for inclusion)

1. The Contractor shall implement the approved C-ESMP and all mitigation measures specified in project safeguard instruments. No mobilization is permitted without written No Objection from SPIU/FPCU.
2. All workers (including sub-contractors and security personnel) shall sign the Project Code of Conduct. Evidence of induction and periodic refreshers shall be provided on request.
3. Incident Notification: The Contractor shall notify SPIU/FPCU within 24 hours of any fatality, serious injury, major spill, significant community conflict, SEA/SH report, or environmental breach. A root-cause investigation and corrective action plan shall be submitted within 7 days.
4. Access for Monitors: The Contractor shall provide full access to works, records, and personnel to Client representatives, FMEnv/SEPA, and independent monitors, and shall implement any corrective actions agreed.
5. Performance Regime: If monthly E&S KPIs fail to meet minimum thresholds (Annex J), the Client may apply financial retention of up to 10% of the monthly certificate until corrective actions are verified.
6. Subcontractor Management: The Contractor is responsible for ensuring all subcontractors comply with this Section; obligations are flowed down into subcontracts.
7. Termination: Material or repeated E&S non-compliance constitutes a default. The Client may terminate for cause and seek damages. SEA/SH violations are grounds for immediate suspension and potential termination.

Show more lines

Annexes (attach to the Bidding Documents)

Annex A — Outline for Contractor ESMP (C-ESMP)

- Project description and scope.
- Legal and ESF framework; permits register.
- Roles/responsibilities and organogram.
- Risk assessment and mitigation matrix.
- Plans: OHS; Traffic; Waste & Pollution; Spill Response; Water & Soil Protection; Biodiversity; Cultural Heritage (Chance Finds); Security; Emergency Response; Training; Stakeholder/GM.
- Monitoring plan (parameters, methods, frequency, locations, responsibilities).
- Reporting templates and data management.
- Budget and schedule.

Annex B — Worker Code of Conduct (sample)

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I, [Name], agree to: (i) treat community members and colleagues with respect; (ii) strictly prohibit SEA/SH, GBV, VAC, and harassment; (iii) follow site safety rules and instructions; (iv) report concerns confidentially; (v) comply with laws, project policies, and disciplinary measures for violations, including removal from site or dismissal.

Signature: _____ Date: ___ Contractor: ___

Annex C — Incident/Accident Notification Form (24-hour)

Project/Lot: ___ Contractor: ___ Date/Time: ___ Location/GPS: ___

Type: [Fatality] [Lost-time injury] [Medical treatment] [Near miss] [Environmental spill] [Community incident] [SEA/SH report]

Brief description:

Immediate controls taken:

Persons affected (do not include PII for SEA/SH):

Reported to (SPIU/FPCU/FMEnv/SEPA):

Preliminary cause(s):

Next steps:

Prepared by: ___ Contact: ___

Annex D — Monthly E&S Report Template

1. Summary of works and workforce
2. Training conducted (type, attendees)
3. OHS performance (hours worked, LTIs, TRIR, near misses)
4. Environmental monitoring results (dust/noise/water/waste volumes)
5. GM statistics (received/resolved, average resolution time)
6. SEA/SH safeguarding actions (awareness sessions, referrals)
7. Inspections and audits; corrective actions
8. Permits status and regulatory engagement
9. Photographs and maps
10. Plan for next month

Annex E — Chance Finds Procedure

Plain Text

Stop work; secure area; notify SPIU/FPCU and FMEnv/SEPA; engage qualified expert; follow authority guidance; resume only after written clearance and integration of mitigation measures.

Show more lines

Annex F — Community/Worker Grievance Form

Plain Text

Complainant (optional): ___ Contact (optional): ___

Date/Location: ___ Category: [Worker] [Community] [SEA/SH*]

Issue details:

Desired resolution:

Acknowledged by (GM Focal Point): ___ Case ID: ___ Timeline: ___

* SEA/SH complaints follow confidential survivor-centered procedures; do not record identifying information.

Annex G — Minimum Contents of OHS Plan

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- Policy and leadership commitment; legal register.
- Hazard/risk assessments (JHA).
- PPE standards and inventory.
- Safe work procedures (lifting, electrical, confined spaces, excavation, hot work).
- Emergency response (scenarios, resources, drills, contacts).
- First aid/medical arrangements.
- Incident reporting/investigation methodology.
- Competency/training matrix.
- Contractor/subcontractor control.
- KPIs and continuous improvement.

Annex H — Minimum Contents of GBV/SEA/SH Action Plan

- Risk assessment and mitigation measures.
- Worker CoC and enforcement steps.
- Training & induction schedule.
- Safe, confidential reporting channels and survivor-centered response; partnerships/MoUs with service providers (health, psychosocial, legal).
- Roles of GBV focal points and management oversight.
- Monitoring indicators (awareness sessions, referrals, corrective actions).
- Non-retaliation and data protection protocols.

Annex I — Traffic Management Plan Template

Route survey and hazards; speed limits; signage and flagging; marshal deployment; vehicle inspection; driver qualifications; journey plans; community notifications; crash response; coordination with local authorities.

Show more lines

Annex J — E&S KPIs (tracked monthly)

- Hours worked; **LTI**s, **TRIR**; near misses.
- Toolbox talks and training numbers.
- Dust/noise levels vs limits; wastewater parameters; waste generated and legally disposed.
- Number and timeliness of grievances resolved.
- SEA/SH safeguarding activities and referrals (no PII).
- Permit compliance and inspection outcomes.

How to Use This Section

- Insert **Section X/Z** into the **General/Special Conditions** of your bidding documents and contracts.
- Attach **Annexes A–J** to the bidding package.
- Require **Pass/Fail items** at bid opening; apply the **scoring matrix** during technical evaluation.
- Flow these obligations down to **subcontracts**.
- Tie monthly payments to verified **E&S KPIs** and delivery of reports.

Annex 38: Environmental and Social Management System (ESMS) for Fund Managers

Under **Component 1** of the **AGROW Project**, the use of Financial Intermediaries (FIs) requires the establishment of an **Environmental and Social Management System (ESMS)**. In accordance with **World Bank Environmental and**

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Social Standard 9 (ESS9), Fund Managers must have a robust system to assess and manage the E&S risks of their sub-projects (loans, equity, or credit lines).

1. Policy Commitment

The Fund Manager must formally adopt an **E&S Policy** approved by senior management.

- **Commitment:** All financial activities under the AGROW Project will comply with Nigerian Environmental Laws and the World Bank ESF.
- **Exclusion List:** The Fund will not finance any activities involving child labor, forced labor, or prohibited pesticides (WHO Class Ia/Ib).

2. Internal Organizational Structure

The Fund Manager must appoint dedicated personnel to oversee the ESMS:

- **E&S Manager:** A senior staff member responsible for the overall system and reporting to the Board.
- **E&S Analysts:** Technical staff who perform due diligence on individual agricultural sub-loans.
- **External Consultants:** Retained for "High Risk" assessments (e.g., large-scale irrigation or land clearing).

3. E&S Due Diligence Procedures (The 5-Step Cycle)

Fund Managers must integrate the following steps into their existing credit approval process:

Step 1: Screening & Categorization

The Analyst screens every application against the **Annex: Subproject Risk Classification Matrix**.

- **Category FI-1 (High Risk):** Significant impact; requires full ESIA.
- **Category FI-2 (Moderate/Substantial):** Limited impact; requires ESMP.
- **Category FI-3 (Low Risk):** Minimal impact; no further assessment needed.

Step 2: E&S Appraisal

Evaluation of the borrower's capacity to manage risks. For agricultural loans, this includes:

- Checking land titles (ESS5).
- Verifying labor practices (ESS2).
- Assessing pesticide management plans (ESS3).

Step 3: Corrective Action Plan (CAP)

If the borrower has gaps (e.g., lacks PPE for workers), the Fund Manager makes the loan conditional upon the borrower implementing a specific **E&S Action Plan**.

Step 4: Monitoring and Supervision

The Fund Manager must conduct periodic site visits to ensure the borrower is following the ESMP. Failure to comply should result in the freezing of further disbursements.

Step 5: Reporting

The Fund Manager submits an **Annual E&S Performance Report** to the AGROW SPIU and the World Bank.

4. Labor Management Procedures (ESS2)

Fund Managers must ensure their own internal labor practices comply with ESS2, as well as those of the sub-projects they fund. This includes:

- **Non-discrimination:** Equal opportunity for female-led agribusinesses.
- **Worker GM:** A mechanism for the Fund Manager's own staff to raise grievances.

5. Stakeholder Engagement & Disclosure (ESS10)

The Fund Manager must:

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- Disclose the ESMS policy on their official website.
- Ensure borrowers engage with local communities affected by their agribusiness activities.
- Establish an **External Communications Mechanism** to receive and respond to public concerns regarding the funded portfolio.

6. Training and Capacity Building

To operationalize this ESMS, the Fund Manager will conduct:

- Training for Credit Officers on "Green Finance" and E&S risk identification.
- Sensitization for borrowers on World Bank standards and Nigerian environmental regulations.

7. ESMS Audit and Review

The ESMS is a "living document." It will be audited annually by an independent E&S consultant to identify areas for improvement and ensure it remains effective as the portfolio grows.

Summary Table: Fund Manager Responsibilities

Element	Responsibility	Frequency
Screening	Credit Analyst	At Application
Site Visits	E&S Specialist	Bi-annually
E&S Reporting	E&S Manager	Annually
ESMS Update	Board of Directors	Every 2 Years

Annex 39: Fund Manager – Agribusiness Standard E&S Clauses for Sub-Loan Agreements

To ensure that the ESMS is not just a policy document but a legally enforceable tool, the following clauses must be integrated into the **Loan Agreement** or **Investment Agreement** between the Fund Manager (Financial Intermediary) and the Agribusiness Borrower.

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These clauses provide the "teeth" needed to suspend disbursements or recall loans if the borrower violates World Bank ESS9 or national environmental laws.

1. Representations and Warranties

The Borrower represents and warrants that:

- **Compliance with Law:** Its business operations are in compliance with all applicable Nigerian environmental, health, safety, and labor laws.
- **No Material Litigation:** There are no pending or threatened claims, investigations, or litigations related to environmental or social issues (e.g., land disputes, fatal accidents, or pollution fines).
- **Accuracy of Information:** All E&S information provided during the due diligence/appraisal phase is true and complete.

2. Affirmative Covenants (Positive Obligations)

The Borrower shall:

- **Maintain Permits:** Obtain and maintain all necessary environmental permits and licenses required for the operation (e.g., NAFDAC for chemicals, Water Use Permits).
- **Implement the ESMP/CAP:** Execute the **Environmental and Social Management Plan (ESMP)** or **Corrective Action Plan (CAP)** agreed upon during the loan appraisal.
- **Labor Standards:** Comply with the project's **Labor Management Procedures**, specifically prohibiting child labor (under 18) and forced labor.
- **SEA/SH Prevention:** Implement a Code of Conduct for workers to prevent Sexual Exploitation, Abuse, and Harassment within the agribusiness operations.

3. Reporting and Notification

- **Annual E&S Report:** The Borrower shall submit a brief annual report summarizing its E&S performance, including any safety incidents or community grievances.
- **Incident Notification:** The Borrower must notify the Fund Manager within **48 hours** of any serious incident, including fatalities, major spills, or large-scale community protests.

4. Inspection and Monitoring Rights

- **Site Access:** The Fund Manager, or its authorized representatives (including the AGROW SPIU and World Bank), shall have the right to visit the borrower's premises during business hours to inspect E&S compliance and interview workers.
- **Audit:** The Borrower shall cooperate with any independent E&S audit commissioned by the Fund Manager.

5. Negative Covenants (Prohibitions)

The Borrower shall **not**:

- **Use Prohibited Chemicals:** Purchase or use any pesticides categorized as WHO Class Ia or Ib.
- **Unapproved Land Expansion:** Expand operations into protected forests, wetlands, or areas with disputed land titles without prior written consent and E&S screening.
- **Change of Activity:** Use the loan proceeds for any activity on the **Project Exclusion List**.

6. Events of Default and Remedies

Any breach of the E&S clauses shall constitute an **Event of Default**. Upon such a breach, the Fund Manager may:

- **Suspend Disbursements:** Halt any further release of loan tranches.
- **Accelerate Repayment:** Declare the entire outstanding principal and interest immediately due and payable.
- **Corrective Action:** Require the borrower to hire an independent consultant to fix the violation at the borrower's own expense.

7. Indemnification

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The Borrower agrees to indemnify and hold the Fund Manager harmless against any losses, fines, or legal costs arising from the Borrower's failure to comply with environmental and social regulations.

Implementation Tip for Fund Managers:

Before signing the agreement, ensure the **ESMP/CAP** is attached as a formal **Schedule** to the contract. This makes the specific mitigation measures (like building a chemical store or buying PPE) a specific contractual milestone.

Annex 40: Fund Manager Sub-Project E&S Appraisal Report (SAR) Template

The **Sub-Project E&S Appraisal Report (SAR)** is the bridge between the initial screening and the final investment decision. For a Fund Manager, this report serves as the official due diligence record, proving to the **World Bank** and the **AGROW SPIU** that the agribusiness borrower has the capacity and commitment to manage risks under **ESS9**.

1. Sub-Project & Borrower Overview

- **Borrower Name:** _____

Nigeria Sustainable Agriculture Value Chains for Growth (AGROW) Project

- **Agribusiness Type:** (e.g., Poultry, Cereal Processing, Irrigation Farming) _____
- **Loan Amount/Type:** _____
- **Appraisal Date:** _____ **Analyst:** _____
- **Risk Category (from Screening):** [] FI-1 (High) [] FI-2 (Substantial/Moderate) [] FI-3 (Low)

2. Site and Environmental Context

- **Location:** (GPS Coordinates / Address) _____
- **Land Ownership:** [] Private/Titled [] Communal/Lease [] Disputed (If disputed, STOP)
- **Sensitive Receptors:** Are there nearby water bodies, protected forests, or residential areas within 500m?

3. E&S Performance Assessment

Rate the borrower's current status on the following:

Requirement	Assessment (Satisfactory/Gap)	Findings/Details
Environmental Permits		(e.g., Waste permits, NAFDAC registrations)
Labor & Working Conditions		(e.g., Presence of child labor, OHS gear)
Pollution & Waste		(e.g., Chemical storage, effluent treatment)
Community Relations		(e.g., History of disputes, local hiring)
SEA/SH Management		(e.g., Code of Conduct for workers)

4. Technical Capacity Evaluation

Does the borrower have the personnel and systems to manage the risks?

- **Management:** Is there a designated safety or environmental officer? [] Yes [] No
- **Systems:** Does the company have an existing OHS or Quality Management manual? [] Yes [] No
- **Record Keeping:** Are accident logs and pesticide logs maintained? [] Yes [] No

5. Gap Analysis & Corrective Action Plan (CAP)

List the specific actions the borrower must take before or during the loan period.

Identified Gap	Required Corrective Action	Completion Timeline	Verification Method
<i>Example: No PPE for workers</i>	<i>Purchase and distribute safety gear</i>	<i>Before 1st draw</i>	<i>Photo / Site visit</i>

6. Stakeholder Engagement & Disclosure

- Has the borrower consulted with local communities? [] Yes [] No
- Is there a grievance mechanism for workers/neighbors? [] Yes [] No

7. Final Appraisal Recommendation

Analyst Decision:

- [] APPROVED: Borrower meets all AGROW Project E&S requirements.
- [] CONDITIONALLY APPROVED: Borrower must complete the CAP (Section 5) before disbursement.
- [] REJECTED: Borrower presents "High Risks" or "Exclusion List" issues that cannot be mitigated.

E&S Analyst Signature: _____ **Date:** _____

E&S Manager (Approval): _____ **Date:** _____

Instructions for Fund Manager Analysts:

1. **Site Visits:** For any loan classified as **FI-2 (Substantial/Moderate)**, a physical site visit is mandatory before signing this SAR.
2. **The "Exclusion List" Check:** Re-verify that the sub-project is not on the World Bank Group Exclusion List (e.g., tobacco, high-impact logging, etc.).
3. **Documentation:** Attach photos of the site, copies of land titles, and any existing environmental permits to this report.

Annex 41: Environmental & Social (E&S) Excellence Training Module for ADMLF Grantees

This **E&S Induction Training Module** is designed for the **Fund Manager** to deliver to AgTechs, Offtakers, and Aggregators immediately after the Grant Agreement is signed. Completion of this training is a **mandatory prerequisite** for the first disbursement.

Slide 1: Our Partnership – Beyond the Money

Nigeria Sustainable Agriculture Value Chains for Growth (AGROW) Project

- **The Goal:** The AGROW Project isn't just about financial growth; it's about "Doing No Harm" to the environment and the community.
- **Your Commitment:** By accepting this grant, you commit to the **World Bank Environmental and Social Framework (ESF)**.
- **The Reward:** Compliance protects your reputation, ensures worker productivity, and secures your next grant tranche.
- **The Risk:** Serious E&S violations (like child labor or toxic spills) lead to **immediate grant suspension** and blacklisting.

Slide 2: Labor & Safety (ESS2 & ESS4)

- **Child & Forced Labor:** Zero tolerance. No workers under 18 for hazardous tasks; all labor must be voluntary.
- **Occupational Health & Safety (OHS):** * Provide PPE (boots, gloves, masks) at no cost to workers.
 - Ensure processing units have fire extinguishers and machine guards.
- **SEA/SH Prevention:** All staff and contractors must sign a **Code of Conduct** prohibiting sexual harassment and abuse of community members.

Slide 3: Environment & Chemical Management (ESS3)

- **Pesticide Use:** Only NAFDAC-approved and Project-approved chemicals. No WHO Class 1a/1b (Red Label) pesticides.
- **Waste Management:**
 - **Processing Waste:** Proper disposal of husks, stones, and wastewater.
 - **Chemical Containers:** Triple-rinse, puncture, and return to designated collection points.
- **Energy Efficiency:** Prioritize renewable energy (Solar/Biomass) for processing units as per your business plan.

4. Stakeholder Engagement & Grievance (ESS10)

- **The Grievance Mechanism (GM):**
 - You must install a **Grievance Box** at your aggregation/processing site.
 - Workers and farmers must know how to complain without being punished.
- **Community Relations:** Maintain open dialogue with local leaders (Sarkis/Baales) to prevent land or water disputes.
- **Transparency:** Be ready for unannounced site visits by the Fund Manager or the World Bank.

5. Your Roadmap to Disbursement

- **Milestone 1 (Before 1st Tranche):** Sign Code of Conduct; Install Grievance Box; Appoint an E&S Focal Point.
- **Milestone 2 (During Operations):** Maintain the **Pesticide Application Log**; Keep Training Records; Submit Quarterly E&S Reports.
- **The Audit:** Your final 30% payment is tied to a **Post-Construction/Operational Audit**. Ensure the site is clean and all community issues are closed.

Trainer's Tips for the Fund Manager:

1. **Attendance:** Use a sign-in sheet to prove that the Grantee's CEO and Site Manager attended.
2. **Handouts:** Provide a physical copy of the "**Top 10 Site Rules**" and the "**Incident Reporting Form.**"
3. **Language:** If the Grantee works primarily with local cooperatives, encourage them to translate these rules into the local language (Hausa, Yoruba, Igbo, etc.).

Annex 42: E&S Incident Reporting Form (Fund Manager Use)

This **Annex 42: Environmental and Social Incident Reporting Form** is a critical tool for accountability. Under the **AGROW Project**, Grantees are legally required to report any "Serious" incident to the Fund Manager within **24 hours**. Failure to report an incident is often considered a more serious breach of the Grant Agreement than the accident itself.

1. General Information

- **Grantee Name:** _____
- **Sub-project Name/ID:** _____
- **Location of Incident:** _____
- **Date & Time of Incident:** _____

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- **Date & Time of Report:** _____

2. Incident Classification

Check the most appropriate category:

- **Fatality:** Death of a worker or community member.
 - **Serious Injury:** Lost time injury, hospitalization, or permanent disability.
 - **Environmental Incident:** Major chemical/fuel spill, forest fire, or water contamination.
 - **Social Incident:** SEA/SH allegation, child labor discovery, or violent community protest.
 - **Security Incident:** Armed robbery, kidnapping, or site sabotage.
-

3. Description of the Incident

Provide a concise "Who, What, Where, and How" (Attach photos if safe to do so):

4. Immediate Actions Taken

What did you do in the first hour?

- **Medical:** First aid administered / Victim transported to hospital.
- **Safety:** Work stopped / Area cordoned off / Power shut down.
- **Containment:** Spill kit deployed / Fire extinguished.
- **Authorities:** Police or Fire Service notified? Yes No

5. Victim/Impact Information

- **Number of persons injured:** _____
 - **Status of victims:** Stable Critical Deceased
 - **Environmental Damage:** (e.g., "50 liters of diesel spilled into drainage ditch")
-
-

6. Root Cause Analysis (Preliminary)

Why did this happen? (Check all that apply):

- Equipment failure.
- Lack of PPE / Safety gear.
- Lack of training / Supervision.
- Unsafe worker behavior.
- Weather conditions / Act of God.

7. Reporting Officer Sign-Off

Name: _____ **Position:** _____

Signature: _____ **Phone:** _____

Instructions for the Grantee:

1. **Speed Over Perfection:** Do not wait for a full investigation to send this form. Provide what you know within 24 hours.

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2. **Confidentiality:** If the incident involves **SEA/SH (Sexual Exploitation, Abuse, or Harassment)**, do **NOT** write the victim's name on this form. Use a coded ID and report directly to the Fund Manager's Social Specialist.
3. **Follow-up:** A detailed **Root Cause Analysis (RCA)** and a **Corrective Action Plan (CAP)** must be submitted within **7 days** of this initial report.

Annex 43: Root Cause Analysis (RCA) Worksheet (Fund Manager Use)

The **Root Cause Analysis (RCA) Worksheet** is the second stage of the incident reporting process. Following the initial 24-hour notification (Annex 42), the Grantee has 7 days to investigate *why* the event occurred and, more importantly, *how* to prevent it from happening again. This worksheet is designed to move beyond "human error" to identify systemic failures in equipment, training, or management.

1. Incident Reference

- **Incident ID (from 42):** _____ **Date of Original Incident:** _____
- **Investigation Team Members:** _____
- **Date Investigation Completed:** _____

2. The "5 Whys" Investigation Technique

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To find the root cause, ask "Why?" until you reach the underlying system failure.

1. **Direct Cause:** (e.g., The worker fell from the grain silo ladder.)
 - *Why did this happen?* → Because the worker slipped on an oily rung.
2. **Indirect Cause:**
 - *Why was the rung oily?* → Because a hydraulic hose on the nearby conveyor leaked.
3. **Contributing Factor:**
 - *Why did the hose leak?* → Because the preventive maintenance schedule was missed.
4. **Management Gap:**
 - *Why was the maintenance missed?* → Because there is no tracking system for equipment servicing.
5. **Root Cause:**
 - *Why is there no tracking system?* → **The Site Management Plan lacks a dedicated maintenance protocol and oversight (Systemic Failure).**

3. Comprehensive Factor Analysis

Check the boxes that contributed to the incident:

Category	Contributing Factors
Hardware/Equipment	<input type="checkbox"/> Poor design <input type="checkbox"/> Lack of maintenance <input type="checkbox"/> Safety guard missing <input type="checkbox"/> Tool failure
Personnel	<input type="checkbox"/> Lack of skill/training <input type="checkbox"/> Fatigue <input type="checkbox"/> Improper PPE use <input type="checkbox"/> Communication gap
Environment	<input type="checkbox"/> Poor lighting <input type="checkbox"/> Extreme heat/rain <input type="checkbox"/> Dust/Noise <input type="checkbox"/> Slippery surfaces
Management	<input type="checkbox"/> No standard procedure <input type="checkbox"/> Lack of supervision <input type="checkbox"/> Unclear roles <input type="checkbox"/> Speed over safety

4. Corrective and Preventive Action (CAPA) Plan

What specific actions will you take to ensure this NEVER happens again?

Action Item	Responsibility	Deadline	Verification (How will FM check?)
<i>Example: Install digital maintenance log</i>	<i>Site Engineer</i>	<i>30-Jan-26</i>	<i>Review of digital records</i>

5. Lessons Learned for Workforce

Describe how this incident will be communicated to other workers (e.g., Special Toolbox Talk, new signage, updated training).

6. Grantee Certification & Sign-Off

Lead Investigator: _____ Signature: _____

CEO/Managing Director: _____ Date: _____

Instructions for the Fund Manager:

- **Verification:** The Fund Manager must not "Close Out" the incident until they have physically verified that the **Action Items** in Section 4 have been implemented.
- **Trend Analysis:** If multiple Grantees report the same Root Cause (e.g., "Lack of Training on Pesticides"), the Fund Manager should organize a project-wide training workshop.

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- **Disclosure:** A summary of the RCA (anonymized) should be included in the **Annual E&S Performance Report (AEPR)** for the World Bank.

Annex 44: ADMLF Environmental & Social Monitoring Calendar

This **E&S Monitoring Calendar** serves as the administrative heartbeat for the Fund Manager. It ensures that the E&S obligations of the **ADMLF matching-grant window** are not forgotten after the initial disbursement. The calendar is divided into **Grantee Actions** (what they must submit) and **Fund Manager Actions** (what you must do to verify).

1. Monthly Routine (Continuous Oversight)

Focus: Site-level behavior and safety.

Entity	Action Item	Deadline	Reference Tool
Grantee	Conduct 4x Weekly Toolbox Talks	Every Friday	Toolbox Schedule
Grantee	Update Pesticide & Accident Logs	Ongoing	Pesticide Log

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Fund Manager	Spot-check 10% of high-risk (FI-2) sites	Rotating monthly	Annex E2 Checklist
Fund Manager	Clear the Site Grievance Boxes	Last Friday	Annex G2 (GM)

2. Quarterly Cycle (Reporting & Verification)

Focus: Data aggregation and milestone verification for tranche releases.

Month	Entity	Action Item	Milestone Link
Mar, Jun, Sept, Dec	Grantee	Submit Quarterly E&S Progress Report	Prerequisite for Tranche
Mar, Jun, Sept, Dec	Fund Manager	Desk review of Grantee Incident Logs	Risk assessment
Apr, Jul, Oct, Jan	Fund Manager	Compile Quarterly Dashboard for PSC	PSC Dashboard
Quarterly	Both	Joint Community/Farmer GRC Meeting	Social License

3. Annual Calendar (Compliance & Audits)

Focus: System-wide performance and reporting to World Bank/FPCU.

Month	Action Item	Responsible	ESMF Reference
January	Annual Review of ESMS effectiveness	Fund Manager	ESS9
February	Internal Audit of all active Grantee CAPs	E&S Manager	SAR / CAP
March 31	Submission of Annual E&S Performance Report (AEPR)	Fund Manager	Annex: AEPR
June	Stakeholder Engagement Forum (All Grantees)	Fund Manager	ESS10
September	Refresher E&S Induction Training for new staff	Fund Manager	Training Module

4. Event-Driven Deadlines (Non-Scheduled)

These actions are triggered by specific events rather than the calendar.

- **Within 24 Hours:** Grantee submits **Annex E3 (Incident Report)** for any serious accident.
- **Within 7 Days:** Grantee submits **Annex E4 (Root Cause Analysis)** following an incident.
- **14 Days Before Disbursement:** Fund Manager conducts **Pre-Disbursement Audit** to verify E&S milestones.
- **On Loan Repayment:** Fund Manager conducts **Sub-project E&S Closure Audit**.

Implementation Tips for the Fund Manager:

1. **Digital Alerts:** Program these deadlines into your Project Management Software (e.g., Jira, Asana, or a shared Outlook Calendar) with automated reminders to Grantees 7 days before reports are due.
2. **Grace Periods:** Allow a 5-day grace period for quarterly reports, but issue an **Official Warning** if a report is more than 10 days late.
3. **The "Golden Rule":** Never process a payment request if the corresponding E&S report for that period is missing.

Annex 45: AGROW Project E&S Due Diligence Questionnaire for Agribusinesses

This **Risk-Based Due Diligence Questionnaire** is a mandatory tool for Fund Managers to assess the E&S maturity of a potential borrower *before* the credit committee reviews the financial application.

The borrower's answers will help determine the **Risk Category (FI-1, FI-2, or FI-3)** and the complexity of the required **Corrective Action Plan (CAP)**.

1. General Business Information

- **Company Name:** _____
- **Nature of Business:** (e.g., Primary Production, Logistics, Processing)
- **Total Number of Employees:** _____ (Male: _____ / Female: _____)

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- **Number of Seasonal/Casual Workers:** _____

2. Environmental Management (ESS3)

1. Does the company have an Environmental Management Policy or any ISO certifications (e.g., ISO 14001)? Yes No
2. Do you have valid permits for water extraction, waste discharge, or air emissions? Yes No
3. How is your solid and liquid waste managed? (Describe storage and disposal):

4. (For Farmers/Aggregators) Do you use or distribute any pesticides? If yes, please list the main brands:

3. Labor and Working Conditions (ESS2)

1. Do all employees have written contracts translated into a language they understand? Yes No
2. What is the age of the youngest person working at your site? _____
3. Are workers provided with Personal Protective Equipment (PPE) at no cost? Yes No
4. Has there been any fatality or serious injury at your facility in the last 3 years? Yes No
5. Do you have a mechanism for workers to raise complaints anonymously? Yes No

4. Land and Community (ESS5 & ESS10)

1. How was the current land for your operations acquired? Private purchase Lease Ancestral/Communal Government Allocation
2. Are there any ongoing disputes or court cases regarding the land title? Yes No
3. Do your operations block any community paths, water sources, or grazing routes? Yes No
4. Have you held any consultation meetings with the host community in the last 12 months? Yes No

5. Safety and Security (ESS4)

1. Does the company hire armed security personnel (Police/Military/Private)? Yes No
2. (If Yes) Are security guards trained on Human Rights and the use of force? Yes No
3. Is the facility located in an area with high security threats (e.g., active banditry)? Yes No

6. Gender and Social Inclusion

1. Does the company have a formal policy against Sexual Exploitation, Abuse, and Harassment (SEA/SH)? Yes No
2. Are there separate toilet and changing facilities for men and women? Yes No

For Fund Manager Use Only: Risk Scoring

Section	Analysis of Gaps	Risk Weight
Environmental	(e.g., No water permit, toxic pesticides found)	<input type="checkbox"/> L <input type="checkbox"/> M <input type="checkbox"/> H
Social/Labor	(e.g., Child labor risk, no worker contracts)	<input type="checkbox"/> L <input type="checkbox"/> M <input type="checkbox"/> H
Land/Security	(e.g., Land dispute, armed guards without training)	<input type="checkbox"/> L <input type="checkbox"/> M <input type="checkbox"/> H

Recommended Risk Category:

- FI-1 (High): Substantial gaps; requires ESIA/Full Audit.
- FI-2 (Moderate): Manageable gaps; requires ESMP and CAP.
- FI-3 (Low): Minor gaps; General E&S clauses only.

Instructions for the Fund Manager:

Environmental and Social Management Framework (ESMF)

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- **Evidence Check:** Ask the borrower to attach copies of their environmental permits and sample labor contracts to this questionnaire.
- **Integrity:** If a borrower answers "No" to the land dispute question, but your local investigation finds an active court case, the application should be **Rejected** for lack of transparency.

Annex 46: Sub-Project Exclusion List (The "No-Go" Guide)

The Sub-Project Exclusion List is a definitive "No-Go" guide for Fund Managers. Any activity found on this list must be rejected immediately during the initial intake phase, regardless of its potential financial return. This list ensures that the AGROW Project does not inadvertently fund activities that cause irreversible environmental damage, violate human rights, or contradict World Bank Group standards.

The Fund Manager shall not finance any sub-project involving the following:

1. Environmental & Ecological Prohibitions

- **Destruction of Critical Habitats:** Any activity located within or resulting in the significant conversion or degradation of critical natural habitats, including Protected Areas, Ramsar Sites (Wetlands), or Gazetted Forest Reserves.

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- **Illegal Logging:** Production or trade in wood or other forestry products other than from sustainably managed forests.
- **Ozone Depleting Substances:** Manufacture, trade, or use of substances prohibited under the Montreal Protocol (e.g., certain refrigerants used in old cold-storage units).
- **Toxic Pesticides:** Purchase, distribution, or use of pesticides categorized as WHO Class Ia (Extremely Hazardous) or Class Ib (Highly Hazardous).
- **Wildlife Trade:** Trade in wildlife or wildlife products regulated under CITES (Convention on International Trade in Endangered Species).

2. Labor & Human Rights Prohibitions

- **Child Labor:** Any activity involving the employment of persons under the age of 18 in hazardous conditions, or any employment of children under the age of 15.
- **Forced Labor:** Any work or service exacted from any person under the threat of any penalty and for which the person has not offered himself/herself voluntarily.
- **Harmful Working Conditions:** Agribusinesses that do not provide basic life-safety measures or those that have a history of unaddressed fatal accidents.

3. Social & Land Prohibitions

- **Forced Evictions:** Activities requiring the involuntary physical displacement of people or those that involve the use of force to acquire land.
- **Indigenous Peoples:** Activities that have adverse impacts on land and natural resources subject to traditional ownership or under customary use by local communities without their Free, Prior, and Informed Consent (FPIC).
- **Cultural Heritage:** Activities that significantly damage non-replicable cultural property, including archaeological, historical, or religious sites.

4. General Commercial Prohibitions

- **Tobacco:** Production, processing, or trade in tobacco and tobacco-related products.
- **Alcohol:** Production or trade in alcoholic beverages (excluding industrial alcohol or biofuels).
- **Gambling:** Casinos and equivalent enterprises.
- **Weapons:** Manufacture or trade in weapons and munitions, including paramilitary materials.

Fund Manager Implementation Guidance

Step	Action
Initial Screen	Compare the borrower's "Business Description" against this list.
Verification	If the borrower claims to be "General Agribusiness," check their asset list for prohibited chemicals or equipment.
Decision	If a match is found, issue a Letter of Ineligibility immediately citing the Project Exclusion List.

Common "Grey Areas" to Watch For:

- **Mixed Farms:** If a farmer grows maize (eligible) and tobacco (ineligible), the entire sub-project is excluded unless the tobacco operation is legally and physically separated.
- **Land Ownership:** If the land title is "under dispute" in court, the project should be excluded until a final legal judgment is provided.

Annex 47: Template Letter of Ineligibility (E&S Grounds)

This formal Letter of Ineligibility provides a clear, documented audit trail for the Fund Manager. It ensures that the rejection is tied specifically to the World Bank Environmental and Social Framework (ESF) and the AGROW Project's Exclusion List, preventing future disputes or claims of unfair treatment.

[Fund Manager Letterhead]

Date: [Insert Date]

To: [Name of Applicant/Authorized Representative] [Company Name] [Address]

Subject: Notification of Ineligibility for the ADMLF Matching Grant – [Sub-Project ID/Name]

Dear [Name of Applicant],

Nigeria Sustainable Agriculture Value Chains for Growth (AGROW) Project

Thank you for your interest in the Agribusiness Development & Matching Loan Fund (ADMLF) under the AGROW Project. We have completed the initial Environmental and Social (E&S) screening of your application titled "[Insert Project Name]," submitted on [Insert Date].

Following a rigorous review against the AGROW Project Exclusion List and the World Bank Environmental and Social Standards (ESS), we regret to inform you that your application has been deemed ineligible for funding at this time.

Reason for Ineligibility: Your proposed activity falls under the following category on the Project's mandatory Exclusion List:

- [Insert Specific Item from Exclusion List, e.g., Use of WHO Class 1a/1b Pesticides]
- [Provide brief detail, e.g., "The application proposes the procurement and distribution of [Chemical Name], which is categorized as an extremely hazardous pesticide prohibited under World Bank ESS3."]

Implications: Under the Environmental and Social Management System (ESMS) governing this Fund, we are strictly prohibited from financing activities that pose high risks to human health, social stability, or the environment. Consequently, we cannot proceed with the technical or financial appraisal of your proposal.

Options for the Future: While this current application cannot be considered, you are welcome to resubmit a revised proposal in future windows, provided that:

1. The prohibited activities/materials are completely removed from the business plan.
2. Your operations are aligned with the project's Labor Management Procedures and Environmental Management Plans.
3. [Optional: Insert any specific remedial action, e.g., "Evidence is provided that the ongoing land dispute has been legally resolved."]

Should you require further clarification regarding the project's E&S standards, please refer to the AGROW Project ESMF available at [Insert Website Link] or contact our Safeguards Team at [Insert Email Address].

We wish you success in your future agribusiness endeavors.

Yours sincerely,

[Signature]

[Name of E&S Manager / Fund Manager Representative] [Position Title]

Instructions for the Fund Manager:

- **Audit Copy:** Always save a PDF copy of this letter in the "Rejected Applications" folder of the Safeguards Information System (SIS).
- **Transparency:** If the rejection is due to a Security Risk (e.g., the site is in an active conflict zone), use the "General Commercial Prohibitions" or "Security Risk" clause to explain that the Fund cannot ensure the safety of project personnel or assets at that location.
- **No Exceptions:** Fund Managers do not have the authority to waive an Exclusion List item. Any request for an exception must be formally denied.

Annex 48: Annual E&S Performance Report (AEPR)

The **Annual E&S Performance Report (AEPR)** is the primary reporting instrument for Financial Intermediaries under **ESS9**. It allows the Fund Manager to demonstrate to the **World Bank** and the **AGROW SPIU** that the portfolio is being managed in accordance with the established **ESMS**.

1. Portfolio Overview

- **Reporting Period:** [January – December 20XX]
- **Name of Financial Institution:** _____
- **Total Number of AGROW Sub-loans Disbursed:** _____
- **Total Portfolio Value (Component 1):** _____

Risk Category	Number of Sub-projects	Total Value (USD/NGN)
---------------	------------------------	-----------------------

Nigeria Sustainable Agriculture Value Chains for Growth (AGROW) Project

FI-1 (High Risk)		
FI-2 (Substantial/Moderate)		
FI-3 (Low Risk)		

2. ESMS Implementation Status

- **Staffing:** Have there been any changes to the E&S Management team? [] Yes [] No
- **Training:** List any E&S training provided to credit officers or borrowers this year:
 - *Topic:* _____ *Date:* _____ *Participants:* _____
- **ESMS Updates:** Were any changes made to the ESMS policies or procedures? [] Yes [] No

3. Sub-project Monitoring & Compliance

- **Site Visits:** Total number of physical E&S monitoring visits conducted this year: _____
- **Corrective Action Plans (CAPs):**
 - Total CAPs active at start of year: _____
 - Total CAPs successfully closed: _____
 - Number of borrowers currently in "Non-compliance": _____
- **Action Taken on Non-compliance:** (e.g., suspension of tranches, mandatory retraining)

4. Safety and Social Incidents

Note: Any "Serious" incidents should have been reported within 48 hours; this is a summary.

Incident Type	Number of Occurrences	Status of Investigation/Closure
Fatalities/Serious Injuries		
Environmental Spills/Fines		
SEA/SH Reports		
Labor Disputes/Strikes		

5. Grievance Mechanism (GM)

- **External Communications:** Number of complaints received from the public/communities regarding funded sub-projects: _____
- **Resolution Rate:** _____ %
- **Key Themes:** (e.g., land boundary issues, noise from processing plants)

6. Case Study: High-Performing Sub-project

Briefly describe one sub-project that demonstrated excellent E&S performance (e.g., successful transition to organic pesticides or 100% safety record).

7. Challenges and Plan for Next Year

- **Major Challenges:** (e.g., "Lack of technical experts for irrigation audits in remote regions.")
- **Continuous Improvement Plan:**

1. _____
2. _____

8. Declaration & Sign-Off

I, the undersigned, confirm that the information provided in this report is an accurate representation of the E&S performance of the AGROW Project portfolio for the reporting period.

E&S Manager: _____ **Signature:** _____

Chief Executive Officer/Managing Director: _____ **Date:** _____

Instructions for Submission:

- **Deadline:** The AEPR is due no later than **March 31st** of the following year.
- **Attachments:** Please attach a summary table of all **FI-1 and FI-2 sub-projects** funded during the year, including their specific E&S risk ratings.
- **Disclosure:** In line with **ESS10**, a summary of this report (excluding sensitive financial/personal data) should be made available on the Fund Manager's website.

Annex 49: Sub-project Environmental & Social Closure Audit

The **Sub-project Environmental and Social Closure Audit** ensures that as a borrower exits the **AGROW Project** financial cycle, they do not leave behind "legacy" liabilities. For the Fund Manager, this audit is a risk-mitigation tool to confirm that the business is sustainable, the land is in good condition, and no unresolved social or environmental claims exist that could later be linked to the financier.

1. Sub-project Final Status

- **Borrower Name:** _____

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- **Loan ID:** _____ **Final Repayment Date:** _____
- **Sub-project Type:** Crop Production Processing Irrigation Other
- **Risk Category at Entry:** FI-1 FI-2 FI-3

2. Environmental Compliance Review

No.	Audit Item	Status (Yes/No)	Findings Evidence /
1	Permit Closure: Are all environmental permits/licenses up to date and valid?		
2	Waste Management: Is the site free of accumulated hazardous waste or scrap?		
3	Soil & Water: Is there any evidence of unmitigated soil erosion or water pollution?		
4	Chemicals: Have all prohibited pesticides been removed or safely disposed of?		

3. Social and Labor Performance Review

No.	Audit Item	Status (Yes/No)	Findings Evidence /
5	Grievance Closure: Are there any open community or worker grievances?		
6	Compensation: (If applicable) Have all land-related compensations been finalized?		
7	Labor Rights: Are there any outstanding claims for unpaid wages or benefits?		
8	SEA/SH: Are there any ongoing investigations or unresolved harassment claims?		

4. Safety and Health Performance Summary

- **Total Accidents/Injuries during Loan Term:** _____
- **Status of Accident Remediation:** (e.g., were injured workers compensated as per Nigerian law?)

- **OHS Legacy:** Are the safety systems established during the loan (PPE use, fire safety) still active and operational? Yes No

5. Final Site Assessment & Observations

Provide a narrative of the site's condition at the time of loan exit. Does the business demonstrate long-term E&S sustainability?

6. Auditor's Conclusion

Final E&S Rating:

SATISFACTORY: The sub-project has met all E&S requirements and poses no legacy risks.

RESERVATIONS: Minor E&S issues remain. (Explain in Section 5).

UNSATISFACTORY: Significant legacy issues exist. (Refer to SPIU Legal Team).

E&S Analyst/Auditor: _____ **Signature:** _____

E&S Manager (Approval): _____ **Date:** _____

Instructions for Fund Manager Closure:

1. **Desk Review:** Before the site visit, review all previous **Annual E&S Performance Reports** and **Corrective Action Plans (CAPs)** to ensure all past "gaps" were closed.
2. **Community Consultation:** For high-impact agribusinesses, speak briefly with community leaders to confirm the borrower is leaving on good terms with the neighbors.
3. **Archiving:** This report must be kept in the borrower's permanent file for at least **5 years** post-repayment to satisfy World Bank audit requirements.

Annex 50: Component 1: Fund Managers E&S Portfolio Summary Dashboard (Sample)

This **Summary Dashboard** is designed for the **Project Steering Committee (PSC)** and the **Federal Project Coordinating Unit (FPCU)**. It provides a high-level, visual overview of how the Fund Managers (Financial Intermediaries) are performing under **Component 1**. The goal is to allow the committee to assess the E&S risk profile of the entire portfolio at a glance, ensuring compliance with **World Bank ESS9**.

1. Portfolio Risk Profile (Total Active Loans)

This section tracks the distribution of risk across all agribusinesses funded.

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Risk Category	No. of Sub-projects	Total Exposure (NGN)	% of Portfolio
FI-1 (High Risk)	3	450,000,000	15%
FI-2 (Moderate/Substantial)	18	1,800,000,000	60%
FI-3 (Low Risk)	12	750,000,000	25%
TOTAL	33	3,000,000,000	100%

2. Compliance Performance (Quarterly KPI)

How well are borrowers following their E&S Management Plans (ESMPs)?

Metric	Status	Target
Borrowers with Approved ESMPs	100%	100%
Borrowers with Dedicated E&S Staff	85%	90%
Successful Closure of Corrective Action Plans (CAPs)	72%	80%
Timely Submission of Annual E&S Reports	95%	100%

3. Safeguards Monitoring & Oversight

Visualizing the intensity of supervision across the Fund Manager's portfolio.

- **Total Site Audits Conducted:** 24 (This Quarter)
- **Non-Compliances Identified:** 8
 - *Top Issue:* Lack of appropriate chemical storage (4 cases).
 - *Second Issue:* Missing PPE for casual farm laborers (3 cases).
- **Enforcement Actions:** 2 Disbursements suspended until CAP completion.

4. Social Impact & Grievance Summary

Ensuring the "Social License to Operate" is maintained.

- **Community Grievances Received:** 5 (3 resolved, 2 pending).
- **Worker Grievances:** 2 (Both resolved through the Worker-GM).
- **SEA/SH Incidents:** 0 Reported.
- **Beneficiary Inclusion:**
 - **Female-led Agribusinesses:** 35%
 - **Youth-led Agribusinesses:** 28%

5. Safety Statistics (Aggregated)

Tracking OHS performance across all funded sites.

Indicator	Current Quarter	Cumulative (YTD)
Fatalities	0	0
Lost Time Injuries (LTI)	1	3
Total Workers Trained in E&S	125	450

6. Strategic Recommendations for the Committee

1. **Chemical Safety Campaign:** Increase technical support for FI-2 borrowers on chemical warehouse standards.
2. **Capacity Building:** Fund Manager "A" requires additional training on screening labor influx risks.
3. **Green Finance Upscale:** 12% of the portfolio is now utilizing solar-powered irrigation; recommend a 5% interest rebate for future "Green" adopters.

Instructions for the Secretariat:

- **Distribution:** This dashboard should be sent to the PSC **5 days prior** to the quarterly meeting.
- **Red Flags:** Highlight any "FI-1" (High Risk) sub-project that has an open "Red" non-compliance status for more than 30 days.

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- **Data Source:** All data must be pulled directly from the **AGROW Safeguards Information System (SIS)** to ensure accuracy and traceability.

Annex 51: Quarterly E&S Compliance Report Template

To finalize the reporting cycle for the **AGROW Project**, the **Quarterly E&S Compliance Report** is the primary document used to communicate progress, challenges, and risk levels to the **World Bank** and the **National Project Steering Committee**. This report aggregates data from the **Safeguards Information System (SIS)**, combining field checklists, grievance logs, and incident reports into a strategic summary.

1. Executive Summary

- **Reporting Period:** [Q1/Q2/Q3/Q4] [Year]
- **Total Active Subprojects:** _____
- **Overall E&S Risk Rating for the Project:** [] Low [] Moderate [] Substantial [] High

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- **Key Achievements:** (e.g., 100% of workers signed CoC, 0 fatalities, all RAPs completed).
- **Major Challenges:** (e.g., security access in certain LGAs, delays in permit renewals).

2. Safeguard Instruments Status

Subproject Name	Instrument Required	Status (Draft/Approved/Disclosed)	Implementation Progress (%)
<i>Example: Kano Hub</i>	ESIA / RAP	Disclosed	75%

3. Occupational Health and Safety (OHS) Performance

Indicator	This Quarter	Cumulative (Project-to-Date)
Fatalities		
Lost Time Injuries (LTI)		
Near Misses Reported		
Number of PPE Inspections		
Total Man-Hours Worked		

4. Social Performance & Inclusion

- **Gender/Youth Targets:**
 - % of Female Beneficiaries this quarter: _____% (Target: 40%)
 - % of Youth Beneficiaries this quarter: _____% (Target: 30%)
- **Stakeholder Engagement:**
 - Number of Town Halls held: _____
 - Number of participants (Disaggregated): Men [], Women [], PWD [].

5. Grievance Mechanism (GM) Summary

Category	Cases Received	Cases Resolved	Average Time to Resolve
Land/Compensation			
Environmental Issues			
Labor/OHS			
SEA/SH (Confidential)			
TOTAL			

6. Environmental Compliance & Monitoring

- **Waste Management:** (e.g., "12 tons of hazardous waste disposed of via licensed vendors").
- **Resource Efficiency:** (e.g., "Installation of solar-powered pumps completed at 4 hubs").
- **Pesticide Management:** (e.g., "Distribution of botanical biopesticides to 500 farmers").

7. Incidents and Non-Compliances

- **Serious Incidents:** (Briefly describe any incidents reported via Annex E3 and the status of the Corrective Action Plan).
- **Payment Liens:** (Number of contractors penalized for E&S non-compliance).

8. Capacity Building Activities

- Number of staff/contractors trained this quarter: _____
- Topics covered: (e.g., "SEA/SH Prevention," "Waste Management").
- Effectiveness: (Based on **Annex F3** pre/post-test results).

9. Conclusion and Work Plan for Next Quarter

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- **Priority 1:** _____
- **Priority 2:** _____

10. Sign-Off

Prepared By (FPCU Safeguards Lead): _____ **Date:** _____

Approved By (National Project Coordinator): _____ **Date:** _____

Instructions for Submission:

- **Submission Deadline:** This report must be submitted to the World Bank Task Team Leader (TTL) no later than **15 days** after the end of each quarter.
- **Supporting Data:** Attach a summary table of the **Annex B2 Permits Tracker** and the **Annex G2 GM Log**.
- **Visuals:** Include 4–5 high-quality, geo-tagged photos showcasing E&S best practices on-site (e.g., waste segregation, proper PPE usage, community meetings).

Annex 52: Environmental and Social Implementation Manual (ESIM)

The **Environmental and Social Implementation Manual (ESIM)** serves as the definitive field guide for **Supervising Engineers (SEs)** and **Resident Engineers**. While the ESMF provides the "what" and "why," this manual provides the "how" for daily site supervision to ensure the contractor's E&S obligations are met.

1. Role of the Supervising Engineer (SE) in E&S

Under the AGROW Project, the SE is not only responsible for the structural integrity of the works but also for the **E&S integrity**. The SE acts as the first line of defense against safeguard violations.

- **Daily Oversight:** Observe worker behavior, PPE usage, and waste handling during routine site rounds.
- **Instruction Power:** Issue "Site Instructions" (SIs) to correct E&S non-compliance.
- **Payment Validation:** Certify that E&S line items in the BoQ have actually been executed before signing IPCs.

2. Pre-Construction Readiness (The Mobilization Phase)

Before authorizing the "Commencement of Works," the SE must verify the following:

- **C-ESMP Approval:** Ensure the Contractor's site-specific plan is approved by the SPIU.

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- [] **Staffing:** Confirm the Contractor’s HSE and Social Officers are physically on-site.
- [] **Sanitation:** Verify that separate toilets and clean drinking water are available.
- [] **Sensitization:** Confirm that the initial community meeting (Annex G1) and worker training have occurred.

3. Routine Supervision & Monitoring Protocol

The SE shall follow this weekly and monthly monitoring cycle:

A. Weekly Visual Checks

- **Housekeeping:** Is the site tidy? Is hazardous waste stored in bunded areas?
- **Safety:** Are excavations shored or barricaded? Are workers using the correct tools?
- **Social:** Is the Project Signboard visible? Is the Grievance Box accessible?

B. Monthly Joint Inspections

The SE leads a formal inspection with the Contractor and SPIU E&S staff using **Annex E2**.

- **Scoring:** Assign compliance scores.
- **Correction:** Record all "Non-Satisfactory" (NS) items in the Site Diary with a 48-hour rectification deadline.

4. Managing Non-Compliance (The Escalation Ladder)

The SE must use the following tiered approach to manage contractor failures:

Level	Severity	Action by Supervising Engineer
Level 1	Minor / First-time (e.g., worker without vest)	Verbal warning + entry in Site Diary.
Level 2	Repeated / Moderate (e.g., failure to water dusty roads)	Formal Site Instruction (SI) + 24hr deadline.
Level 3	Serious / Persistent (e.g., oil spill, child labor)	Non-Compliance Report (NCR) + Withholding of IPC payment item.
Level 4	Critical / Life-threatening (e.g., lack of shoring in deep trench)	Immediate Work Suspension at the specific location.

5. Incident Management Procedures

In the event of an accident (injury, fatality, or major spill), the SE must:

1. **Stop Work:** Ensure the area is safe and prevent further injury/damage.
2. **First Aid/Evacuation:** Oversee the medical response.
3. **Scene Preservation:** Ensure nothing is moved until the SPIU/Police investigate.
4. **Notification:** Ensure the Contractor submits **Annex E3** within 24 hours.

6. Documentation & Reporting

The SE’s monthly progress report must include a dedicated **E&S Section** containing:

- Summary of Annex E2 scores.
- Status of all open Non-Compliance Reports (NCRs).
- Total number of workers on site (disaggregated by gender).
- Records of any grievances received through the on-site box.

7. Close-out and Site Restoration

Before issuing the **Taking-Over Certificate**, the SE must verify:

- All temporary structures and labor camps are dismantled.
- All waste, including hazardous scrap, has been removed by licensed vendors.
- Borrow pits (if any) are reinstated or rehabilitated as per the ESMP.
- The community has been formally notified of the project completion.

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Instructions for the Supervising Engineer:

- **Be Proactive:** Do not wait for the Monthly Inspection to correct a hazard.
- **Evidence is Key:** Take photos of both "Bad Practices" (to support NCRs) and "Good Practices" (to show progress).
- **Communication:** Maintain a collaborative but firm relationship with the Contractor's HSE Officer.

Annex 53: Contractor ESMP (C-ESMP) Template

1. Contractor Information & Commitment

- **Project Name:** _____
- **Contractor Name:** _____
- **C-ESMP Revision No/Date:** _____
- **Contractor's Management Commitment:** (A signed statement by the Managing Director pledging adherence to World Bank ESS).

2. E&S Management Team

The Contractor must provide an organization chart and contact details for the on-site team.

Role	Name	Qualification/Certification	Phone Number
Site Manager			
EHS Officer		e.g., NEBOSH/OSHA	
Social Liaison		e.g., Sociology/PR	

3. Site-Specific Management Plans (The "Sub-Plans")

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The C-ESMP must include specific "Method Statements" for the following areas:

- **A. Occupational Health & Safety (OHS) Plan:** Details on PPE distribution, first aid location, emergency evacuation routes, and the nearest mapped hospital.
- **B. Waste Management Plan:** Locations of waste collection points, segregation bins, and the contract with a licensed hazardous waste carrier.
- **C. Labor Influx & Camp Management:** (If applicable) Rules for the worker camp, including sanitation, water supply, and security to prevent community conflict.
- **D. Traffic & Access Management:** Maps showing routes for heavy machinery, speed limits, and locations of flaggers to protect community children and livestock.
- **E. Pollution Control Plan:** Strategies for dust suppression (watering schedule) and fuel storage bunding.

4. Social Management & SEA/SH Prevention

- **Code of Conduct:** Confirmation that 100% of staff have signed the **SEA/SH Code of Conduct**.
- **Worker GM:** Description of how workers can file a complaint (e.g., a dedicated phone line or physical box in the breakroom).
- **Community Relations:** Schedule for monthly meetings with the host community.

5. Emergency Preparedness & Response

The contractor must list the protocol for specific emergencies:

1. **Chemical/Fuel Spill:** (e.g., "Deploy spill kit, notify SPIU within 1 hour").
2. **Serious Injury:** (e.g., "Stabilize on-site, transport via project ambulance to City Hospital").
3. **Fire:** (e.g., "Sound alarm, muster at Point A, utilize extinguishers").

6. Monitoring and Reporting Schedule

The Contractor commits to the following reporting frequency:

Report Type	Frequency	Submitted To
Daily Safety Log	Daily	Kept on-site for SE review
Weekly Incident Summary	Weekly	Supervising Engineer (SE)
Monthly E&S Progress Report	Monthly	SPIU / SE
Serious Incident Notification	Within 24 Hours	SPIU / World Bank

7. C-ESMP Approval Status

Submitted By (Contractor Manager): _____ **Date:** _____

Reviewed By (Supervising Engineer): _____ **Date:** _____

Final Approval (SPIU E&S Specialist): _____ **Date:** _____

Instructions for Contractors:

- **Don't Copy-Paste:** A C-ESMP for a warehouse rehabilitation must look different from one for a dam repair. Use the site maps to show exactly where your safety gear and waste bins will be.
- **Update Regularly:** If the scope of work changes (e.g., adding a night shift), the C-ESMP must be updated and re-approved.
- **Transparency:** Keep a printed copy of the approved C-ESMP in the site office at all times for inspection.

Annex 54: Environmental Site Restoration (Decommissioning) Checklist

To ensure that the **AGROW Project** leaves a positive legacy, the **Environmental Site Restoration (Decommissioning) Checklist** must be completed before the final payment is released to the contractor. This process ensures that the land is returned to a safe, productive, and stable state, fulfilling the requirements of **World Bank ESS1 and ESS3**.

1. Subproject Overview

- **Subproject Name:** _____
- **Contractor Name:** _____
- **Site Location:** _____
- **Date of Inspection:** _____

2. Infrastructure & Equipment Removal

No.	Requirement	Status (Yes/No)	Observations/Actions Required
1	Have all temporary site offices, sheds, and labor camps been dismantled?		

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2	Have all heavy machineries, vehicles, and spare parts been moved off-site?		
3	Have temporary fencing and safety barricades been removed?		
4	Have all temporary power lines and water pipes been safely disconnected?		

3. Waste & Pollution Clean-up

No	Requirement	Status (Yes/No)	Observations/Actions Required
5	Is the site free of construction debris (concrete, timber, scrap metal)?		
6	Have all hazardous waste bins (oils, chemicals) been emptied by licensed vendors?		
7	Are there any visible oil or fuel stains on the soil? (Must be excavated/treated).		
8	Have soak-away pits and temporary latrines been emptied and backfilled?		

4. Land Rehabilitation & Re-vegetation

No	Requirement	Status (Yes/No)	Observations/Actions Required
9	Have all borrow pits used for fill material been backfilled and leveled?		
10	Is the soil surface loosened (decompacted) to allow for agricultural use?		
11	Has original topsoil been spread back over cleared areas?		
12	Have native trees or grass been planted as per the Re-vegetation Plan ?		
13	Are drainage channels clear of silt and functioning to prevent erosion?		

5. Community & Social Handover

- **Public Safety:** Are there any open pits, sharp objects, or unstable structures left behind? [] Yes [] No
- **Access:** Have community access roads damaged by heavy trucks been repaired? [] Yes [] No
- **GM:** Are there any outstanding community grievances related to land damage? [] Yes [] No

6. Final Verification and Sign-Off

Recommendation:

[] Site is fully restored. Release Final Retention Payment.

[] Site requires further work. Withhold payment until actions in "Observations" are met.

Contractor Representative: _____ **Signature:** _____

Supervising Engineer: _____ **Signature:** _____

SPIU Environmental Specialist: _____ **Date:** _____

Guidelines for the SPIU Team:

- **The "Photo Record":** Compare the restoration photos with the "Baseline Photos" taken during the initial **ESSR (Screening)** phase.
- **Topsoil Management:** Ensure the contractor does not bring in "foreign" soil that may contain invasive weed species or pests.
- **Community Sign-off:** For communal land, it is highly recommended to have the Community Leader (e.g., Baale or Sarki) sign a simple "Certificate of Satisfaction" to prevent future litigation.

Annex 55: Post-Construction E&S Audit Report (PCAR)

The **Post-Construction Audit Report (PCAR)** is the final accountability document for the **AGROW Project**. It serves as a "Closing Statement" that proves to the World Bank, Federal Ministry, and host communities that the subproject was completed without lasting damage and that all social commitments were honored.

1. Project Overview

- **Subproject Name/ID:** _____
- **Final Contractor:** _____
- **Construction Period:** From [Date] to [Date]
- **Audit Date:** _____

2. Compliance Scorecard

This section summarizes the overall performance against the original ESMF and site-specific ESMP.

Safeguard Dimension	Rating (1-5)*	Key Successes / Persistent Issues
Environmental Protection		
Occupational Health & Safety		

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Social Inclusion & Gender		
Labor & Working Conditions		
Land acquisition and involuntary resettlement		
Grievance Mechanism		
Stakeholder Engagement		

**Rating Scale: 1 (Poor/Non-compliant) to 5 (Excellent/Exceeds Standards)*

3. Environmental Restoration Performance

- **Site Cleanup:** Was all construction debris and hazardous waste removed? [] Yes [] No
- **Re-vegetation:** Total area re-planted: _____ (Ha). Survival rate of seedlings: _____%
- **Soil & Water:** Have all erosion points been stabilized and water channels cleared? [] Yes [] No
- **Legacy Issues:** Are there any "latent" environmental risks (e.g., potential for future flooding or chemical leaching)? _____

4. Social Impact & Grievance Closure

- **GM Resolution:** * Total Grievances Received: _____
 - Total Grievances Resolved: _____ (Target: 100%)
 - Average Resolution Time: _____ Days
- **SEA/SH Prevention:** Total number of reported SEA/SH incidents: _____
 - If >0, describe the closure and support provided to the survivor (Confidential ID only).
- **Involuntary Resettlement:** Have all PAPs (Project Affected Persons) confirmed receipt of full compensation? [] Yes [] No

5. Safety & Labor Statistics (Final Totals)

- **Total Man-Hours Worked:** _____
- **Total Lost Time Injuries (LTI):** _____
- **Fatalities:** _____ (Target: 0)
- **Local Labor Usage:** _____% of workforce was from the host community.
- **Youth/Female Employment:** _____% Youth / _____% Female.

6. Lessons Learned & Best Practices

- **What worked well?** (e.g., "The use of solar-powered borehole pumps reduced site emissions.")
- **What could be improved?** (e.g., "Earlier engagement with nomadic herders could have prevented the fence dispute in Month 3.")

7. Final Recommendation & Handover

- [] The site is E&S compliant. **Recommend release of final retention payment.**
- [] The site has minor non-compliances. **Withhold [Amount] until [Action] is completed.**
- [] The site has major non-compliances. **Refer to FPCU for legal action/debarment.**

8. Sign-Off

Auditor (FPCU/Third Party): _____ **Signature:** _____

SPIU Project Coordinator: _____ **Signature:** _____

Community Representative: _____ **Date:** _____

Instructions for the FPCU:

- **Evidence Portfolio:** Attach "Before vs. After" photos and the signed **Restoration Checklist** to this report.

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- **Public Disclosure:** A non-technical summary of this audit should be presented to the **Community Development Committee (CDC)** to ensure a transparent exit.
- **Archiving:** This report is the primary evidence required for the **World Bank Implementation Completion Report (ICR)**.