

FEDERAL MINISTRY OF AGRICULTURE AND
FOOD SECURITY



**Nigeria Sustainable Agriculture Value
Chains for Growth (AGROW) Project**

**LABOR MANAGEMENT PROCEDURE
(LMP)**

FINAL REPORT

FEBRUARY, 2026

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Abbreviation

AGROW	Nigeria Sustainable Agriculture Value Chains for Growth
APP	Agriculture Promotion Policy
CoC	Code of Conduct
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
FCT	Federal Capital Territory
FMAFS	Federal Ministry of Agriculture and Food Security
FML&E	Federal Ministry of Labour and Employment
GBV	Gender Based Violence
GRC	Grievance Redress Committee
GM	Grievance Mechanism
HSE	Health Safety and Environment
ILO	International Labour Organization (ILO)
IPF	Investment Project Financing (IPF)
LMP	Labour Management Procedure
NWC	National Working Committee
NATIP	National Agricultural Technology and Innovation Policy
NPCU	National Project Coordinating Unit
OHS	Occupational Health and Safety
PSR	Public Service Rule
PPE	Personnel Protective Equipment
RTU	Registrar of Trade Union
SEA	Sexual Exploitation and Abuse
SME	Small Medium Enterprise
SPCU	State Project Coordinating Unit
STD	Sexually Transmitted Disease
STI	Sexually Transmitted Infection
ToR	Terms of Reference
VAT	Value Added Tax

EXECUTIVE SUMMARY

ES 1: Introduction

Agriculture is a key driver of Nigeria's economy, contributing 25% of GDP in 2024 and accounting for 40% of non-oil exports. Despite its importance, the sector faces major challenges including food insecurity—affecting over 31 million people—due to inflation, insecurity, population pressures, and climate change. In response, the Federal Government, with World Bank support, is implementing the **US\$500 million AGROW Project** to strengthen sustainable agricultural value chains.

The **Labour Management Procedure (LMP)** for AGROW guides how labour-related risks will be managed in line with Nigerian laws and the World Bank's Environmental and Social Framework, especially **ESS2 (Labour and Working Conditions)** and **ESS4 (Community Health and Safety)**. It applies to all project workers, but civil servants are only included if formally transferred to the project.

The AGROW Project aims to **increase smallholder productivity and expand private-sector investments** to improve food security and create jobs. It has four major components:

1. **De-risking private sector investments** through performance-based matching grants to strengthen linkages between smallholders and private offtakers for rice, maize, cassava, and soy.
2. **Modernizing smallholder production** by improving research, extension, climate-smart technologies, and establishing digital systems such as a national farmer registry and weather/soil databases.
3. **Improving the enabling environment** for private sector engagement in seed and fertilizer markets and addressing regulatory bottlenecks.
4. **Project coordination, M&E, and safeguards compliance**, including citizen engagement, communications, and independent verification.

ES 2: Legal and Regulatory Framework

The AGROW LMP is anchored on existing national laws, international laws, the Labour Act, applicable Laws of the Federal Government of Nigeria, and particularly the World Bank ESS 2, covering general provisions. Some of the relevant Laws and international commitments reviewed includes;

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- The Labour Act 2004;
- Factories Act, 1990; 2004;
- Worker's Compensation Act (2010);
- Trade Unions (Amended) Act, 2005: Relevant provisions include
- The Child Rights Act, 2003;
- National Minimum Wage Act, 2010; and
- National Policy on Occupational Safety and Health, revised 2020.
- International Labour Organization (ILO)
- The International Covenant on Economic, Social and Cultural Rights (ICESCR) (2004)
- The International Covenant on Civil and Political Rights (ICCPR) (2004)
- The Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (CAT) (1993)
- The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) (1984)
- The Convention on the Rights of the Child (CRC) (1990)
- The Convention on the Rights of Persons with Disabilities (CRPD) (2012)

ES 3: Potential Labour Risks and Mitigation Plan

Risks/Impacts	Analysis	Mitigation
Poor working conditions (unsafe work environment, underpayment, lack of workers' rights, etc.)	<p>The Rights of workers under the Labour and employment Act (which will include any applicable collective agreements), may be abused. Worker's payment may be delayed, irregular, or may be underpaid.</p> <p>Campsites may be poorly managed, in conducive for workers, insecure, poor sleeping conditions, lack of access to basic amenities like water, toilets, healthcare etc. The general appearance of the camp deteriorates making camp life unpleasant</p>	<p>Project workers will be paid on a regular basis as required by Labour and employment Act (with a principle of "equal pay for equal work"</p> <p>In the case of subcontracting, the Borrower will require such third parties to include equivalent requirements and non-compliance remedies in their contractual agreements with sub-contractors.</p> <p>The SPCU shall inspect the campsites to ensure workers have appropriate living quarters, sanitation facilities separate for male and female, basic amenities</p> <p>All project workers will be provided with adequate periods of rest per week, annual holiday and sick leave, as required by national law.</p> <p>Ensure that campgrounds and common areas are routinely cleaned and organized with appropriate signage in place, and that grounds are maintained (e.g., grassed areas are regularly mown).</p>
	Decisions relating to the employment or treatment of project workers may	The employment of project workers will be based on the principle of

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Risks/Impacts	Analysis	Mitigation
	discriminate against certain classes of workers including women, vulnerable groups amongst others.	equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation
Discrimination and Unequal Opportunity	Decisions relating to the employment or treatment of project workers may discriminate against certain classes of workers including women, vulnerable groups amongst others.	The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation
	<p>Payment of workers may be based on discrimination e.g. male may be paid higher than women even on the same level of job schedule.</p> <p>Foreign workers may be treated better than local workers in terms of living conditions, unequal pay, varying closing time etc. even when they are on the same level of qualification and experience</p>	<p>Working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices.</p> <p>Ensure non-discrimination on all categories of workers.</p>
Arbitrary decisions by contractors on Terms and Conditions of employment	<p>The duration of the contracts offered to contractor workers are short and may not allow employees adequate time and information for meaningful collective bargaining, leading to discontent of employees and disputes.</p> <p>Project workers may not be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment.</p>	<p>The State Project Coordinating Unit (SPCU) will closely supervise the Contractor Recruitment Plan and ensure fairness of Employment Terms and Conditions against the applicable and prevailing National stipulations.</p> <p>All information and documentation must be provided at the beginning of the working relationship and when any material changes to the terms or conditions of employment occur.</p> <p>Where applicable, project workers will receive written notice of termination of employment and details of severance payments in a timely manner</p>
Child labour	There is a risk that children (below the age of 18) will be used as Labour in the project. Under-aged persons within the community may disguise as above 18 to enable them work and get paid	<p>The minimum age of eighteen (18) will be enforced at recruitment and in daily staff team talks by Contractors. SPCU will also supervise this through the Contractor Management Checklist.</p> <p>Contractors will liaise with community liaise to attest to the age</p>

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Risks/Impacts	Analysis	Mitigation
		<p>and conduct of all local hires and maintain a list of same.</p> <p>Hired project workers above 18 shall conduct his/her activities in ways that are not detrimental with respect to education or be harmful to the child's health or physical, mental, spiritual, moral or social development</p>
Forced labour	<p>There is a risk that there could be involuntary or compulsory Labour, such as indentured Labour, bonded Labour, or similar Labour-contracting arrangements. This prohibition covers any of these.</p>	<p>Contractors will ensure that no forced labour exists in the project by gathering documents and appropriate proof.</p> <p>A consent section will be part of the employee signed employment contract.</p> <p>Contractors will ensure that if labour is sourced from any subcontracting agency, the workers are not subject to coercion and forced Labour conditions.</p>
OHS	<p>Dust and particulate emissions and welding works from the civil works site may cause respiratory and eye impairment health concerns for workers and the public, and may also cause risk of accident, injury and death.</p> <p>Movement of trucks carrying sand and materials, and lack of road safety measures.</p> <p>Site workers will be exposed to risks of accidental collisions with moving vehicles, strains, and ergonomics from repeated movements or from lifting and heaving of heavy objects, slips and falls.</p> <p>Accidental cuts from tools and machines are also safety risks.</p>	<p>First aid boxes should also be provided at the construction site, staging area and mobile.</p> <p>Contractors will implement the AGROW Occupational Health and Safety Plans.</p> <p>Contractors should provide HSE training for all workers before commencement of work and periodically (see sample training plan in annex 4)</p> <p>Maintain a safe working environment, including workplaces, machinery, equipment, and processes under their control are safe and without health risk, including by use of appropriate measures relating to chemical, physical and biological substances and agents.</p>

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Risks/Impacts	Analysis	Mitigation
		<p>Where required, hire security for workers</p> <p>Every site should have emergency prevention, preparedness and response arrangements to emergencies.</p> <p>All contractors should have full-time HSE officers on their team</p> <p>Contractors should provide adequate PPEs for all their workers, and the contractors' HSE officers should enforce compliance</p>
Right of Association	<p>Workers have the right to freely form, join or not join a trade union for the promotion and protection of the economic interest of that worker</p> <p>Workers have a right to organize, collective bargaining, and representation</p>	<p>The SPCU will ensure that workers are informed of their right of association and collective bargaining</p> <p>The SPCU should also inform workers of the workers GRM and their right to utilize the system</p>
Termination of employment and disciplinary actions	<p>Termination of appointment should abide by the following principles:</p> <ul style="list-style-type: none"> Valid or reasonable; Clear and unambiguous; The employee is aware, or could reasonably be aware of the rule or standard; and The procedure to be applied in the event the employee contravenes any of these rules <p>The disciplinary process should be laid out before commencement of work and explained to every worker</p>	<p>The SPCU should periodically review workers disciplinary and termination processes to ensure that they are executed fairly and without prejudice</p> <p>Where unfair treatment is established the SPCU should put in place corrective action and follow up to ensure execution</p>
Contractors management	<p>Records of workers engaged under the Project, including contracts must be kept</p> <p>Records of all training attended by workers including CoC, HSE, STIs/STDs, GBV etc.</p> <p>Accidents/ incidents and corresponding root cause analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (Corrective Action Register)</p> <p>Records of strike actions, reasons and</p>	<p>Documents should be kept at the site office with the site engineers and SPCU office</p> <p>The FPCU team should check these records during monitoring visits</p>

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Risks/Impacts	Analysis	Mitigation
	<p>resolution reached</p> <p>Records of grievances and how they were resolved</p>	
Grievance mechanism	<p>Workers may be aggrieved due to unfair treatment, poor working conditions, conflicts, poor pay, over-stretched working hours amongst other things.</p> <p>A GRM with a structured process for managing complaints and will be designed to address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned in a language they understand, without any retribution, and will operate in an independent and objective manner</p> <p>The grievance mechanism will not impede access to other judicial or administrative remedies that might be available under the law such as Industrial Court of Nigeria</p>	<p>The provisions of this LMP shall be disseminated by the SPIUs for adoption to all contractors.</p> <p>The SPCU shall provide oversight to ensure effective implementation of the workers GRM.</p>
Labour influx	<p>The project may face influx of Labour to local communities especially where skilled labourer's are not available in some project sites.</p> <p>This could lead to Increase in potential spread of STIs/STDs, HIV/AIDs due to workers on site, increase in GBV/SEA especially for Girls been exposed to contractors, sexual relations between contractors and minors and resulting pregnancies, encourage presence of sex workers in the project communities.</p> <p>This could also lead to competition for resources like water, health facilities, electricity in the project locations</p>	<p>Encourage hiring of Labour from the host communities. Maintain Labour relations with local communities through a Code of Conduct (CoC) (see sample CoC in annex 2).</p> <p>The Code of Conduct must be signed by all categories of workers.</p> <p>Workers must be trained on the provisions of the CoC about refraining from unacceptable conduct toward local community members, specifically women and informed of the sanctions for non-compliance.</p> <p>Training must be conducted for all new hires including sub-contractors.</p> <p>Contractors should make resources available for their workers as included in relevant documents such as ESMF and ESMP</p>
Primary Suppliers	Primary suppliers could also have occupational injuries, incident/accidents while performing project related functions	Contractors will ensure that measures such as clear contractual OHS obligations, supplier OHS

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Risks/Impacts	Analysis	Mitigation
		management systems, training, hazard controls, incident reporting and emergency preparedness are put in place by its primary suppliers. Where serious safety issues persist, he will remediate or replace suppliers that cannot meet the requirements.

ES 4: Disclosure

The AGROW LMP will be disclosed in compliance with relevant Nigerian regulations and the World Bank Environmental and Social Framework. It will be disclosed at designated sites as identified by the Federal Ministry of Agriculture and Food Security and at the World Bank external website.

ES 5: Conclusion

The AGROW LMP provides a comprehensive plan to mitigate the labour risks associated with the project. It identifies labour requirements and sets out the procedures for addressing labour conditions and risks associated with the proposed project, which is aimed at helping the project determine the resources necessary to address project labour issues. With effective implementation, adequate financing, and strong stakeholder commitment, the LMP will protect the human dignity of all workers directly or indirectly involved in the AGROW project.

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CHAPTER 1 INTRODUCTION

1.0 Background

Agriculture has been acknowledged to possess the greatest potential for sustainable economic development and remains critical to Nigeria's economy, as the share of agriculture in GDP has grown from around 20 per cent in the early 2000s to 25 per cent in 2024¹. Agribusiness holds significant promise for Nigeria's economic recovery and job creation, particularly in national development and as an essential path to poverty reduction. The sector exports have constituted 40 per cent of non-oil exports from Nigeria in 2023 (5 per cent of total exports) and contribute to the employment of a significant share of the population, which operates within a comprehensive policy framework anchored by the National Agricultural Technology and Innovation Policy (NATIP) 2022-2027. Despite its importance, the sector faces multiple interconnected challenges that constrain its development potential. In 2024, Nigeria faced a severe food security crisis, with over 31 million people experiencing acute food insecurity, exacerbated by rising inflation, population growth, unrest, and climate change, particularly in the northeast.

In its desire to achieve sustainable growth in agricultural production, the Federal Government of Nigeria, with support from the World Bank Group, obtained a credit of US\$500million towards the implementation of the Nigeria Sustainable Agriculture Value Chains for Growth (AGROW) Project. The AGROW will be financed through the Investment Project Financing (IPF) and implemented by the Federal Ministry of Agriculture and Food Security in collaboration with selected states.

1.1 Labour Management Procedures

This Labour Management Procedure is developed by the Federal Ministry of Agriculture and Food Security to manage risks associated with labor and working condition under the Nigeria Sustainable Agriculture Value Chains for Growth (AGROW) Project. The LMP sets out the Project approach to meeting national requirements as well as the objectives of the World Bank's Environmental and Social Framework, specific objectives of Environmental and Social Standard 2: Labour and Working Conditions (ESS2) and Standard 4: Community Health and Safety (ESS4). The LMP recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth.

It identifies labour requirements and sets out the procedures for addressing labour conditions and risks associated with the proposed project, which is aimed at helping the project to determine the resources necessary to address project labour issues. The World Bank has rated the risks and impact associated with workers as well as community health and safety, as substantial due to the nature of proposed sub project activities (especially the provision of infrastructure, greater application of inputs to raise productivity and the need to employ labor at the local level may entail both environmental and social risks). The associated risks and impacts can be largely avoided, mitigated, minimized or managed through procedures set out in this LMP. The LMP will be reviewed continually during project implementation and adequate measures and procedures to manage negative impacts will be put in defined.

¹ Data on macroeconomic indicators taken from NDU April 2025, and the database maintained by the Nigeria team, based on data shared by National Bureau of Statistics

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1.2 Objectives of the LMP

The purpose of the LMP is to set out general guidance relevant to labour risks associated in terms identification, assessment and prescribe on how to address the issues of Child and Forced Labour, Labour Influx, Gender-based Violence, Occupational Health and Safety, and Trafficking.

Other objectives include:

- To promote safety and health at work.
- Establish arrangements to appropriately manage and protect the OHS and welfare of project workers who may be exposed to risks associated with the project activities and services associated with the AGROW Project;
- Ensure project workers understand their rights in relation to labour and working conditions; right to freedom of association and collective bargaining;
- Provide project workers with a feedback mechanism for them to raise feedback, concerns, complaints and grievances and to receive information on the response and any associated corrective action;
- Prevent discrimination in hiring, remuneration, access to training, on the grounds of race, national or social origin, birth, religion, disability, gender, sexual orientation, union membership, political opinions and age and promote equal opportunities;
- Manage disciplinary practices and grievances in a manner that treats those affected individuals with respect and dignity and without threat, abuse or ill-treatment;
- To protect project workers, including vulnerable workers such as women and girls, persons with disabilities, children of working age, migrant workers, contracted workers, community workers and primary supply workers
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.

1.3 Scope of the LMP

The LMP will cover all categories of workers. The LMP does not cover government workers/civil servants working in connection with this project, unless there is a legal transfer of their employment or engagement to this project.

In summary, the LMP will cover the following issues:

- a. Labour use on the project, such as number of project workers, characteristics of project workers, timing of labour requirements, etc. Also, identification of all classes of possible project workers.
- b. Assessment of key potential labour risks, which may include:
 - The conduct of hazardous work, such as working at heights or in confined spaces, the use of heavy machinery, or the use of hazardous materials
 - Likely incidents of child labour or forced labour that expose young workers to hazardous work with reference to the agriculture sector in Nigeria.
 - Likely presence of migrants or seasonal workers
 - Risks of labor influx

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- Child and forced Labour
- Risk of Gender Based Violence including Sexual Exploitation and Abuse and Sexual harassment (SEA-SH)
- General understanding and implementation of occupational health and safety requirements

c. Overview of Labour legislation (Terms and conditions): This section sets out the key aspects of national labour legislation concerning terms and conditions of work, and how national legislation applies to different categories of workers identified, non-discrimination and equal opportunity, Protecting the Workforce and Grievance Mechanism

d. Overview of labour legislation (Occupational Health and Safety): This sets out the key aspects of the national labour legislation with regard to occupational health and safety, and how national legislation applies to the different categories of workers.

e. Responsible Staff: This section identified the functions and/or individuals within the project responsible for (as relevant): engagement and management of project workers, engagement and management of contractors/subcontractors, Occupational Health and Safety (OHS), training of workers and addressing worker grievances.

1.4 AGROW Project Components

The proposed Project Development Objective of AGROW is to increase smallholder productivity and private sector investment in agriculture for greater food and nutrition security and job creation in participating states of Nigeria.

1.4.1 Project Components

The proposed interventions are categorized under four main components:

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 prevent agribusinesses, processors, and off-takers from sourcing reliably from Nigeria's fragmented base of smallholder producers. Despite strong demand for rice, maize, cassava, soy, among other crops, aggregators face persistent challenges in securing the volumes, quality, and delivery consistency needed to operate at efficient capacity. Smallholders, in turn, struggle to access markets due to weak collective organization, limited on-farm and post-harvest assets, insufficient value-addition capabilities, and the absence of structured contractual arrangements with buyers. These constraints undermine the development of commercially viable supply chains and prevent producers, especially women and youth, from participating in higher-value segments of Nigeria's agrifood system. As part of Nigeria's Agriconnect Compact, the efforts under this Component will focus on scalable interventions to enhance smallholder aggregation models. As such, Component 1 seeks to strengthen smallholder-off-taker partnerships, expand aggregation capacity, improve value addition, and increase the share of farmers supplying to the formal markets under predictable, transparent, and mutually beneficial arrangements.

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To deliver these objectives in a market-aligned manner, Component 1 will channel support through a unified catalytic mechanism, the Agribusiness De-risking and Market Linkage Facility (ADMLF), accessible only to states that meet agreed eligibility criteria. 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. By combining targeted public co-financing with private investment, the Facility will reduce sourcing risks, crowd in private capital, and scale inclusive business models that improve aggregation systems, post-harvest handling, processing, and market access in priority value chains. Comprehensive implementation details will be provided in the ADMLF Grant Procedures Manual

Component 2: Public Investments for Modernization of Smallholder Production

Component 2 finances targeted public investments necessary to raise productivity, strengthen resilience of farmers, and leverage private sector participation along selected value chains. The component addresses critical public-good gaps that limit the effectiveness of private investment and is structured around two sub-components: (i) strengthening research, extension, and skills for technology development and transfer; and (ii) strengthening the digital agricultural ecosystem.

Sub-Component 2.1: Strengthening Research, Extension, Technology Transfer Systems (US\$135 million)

This sub-component will support both the development and transfer of high-yielding, climate-smart agricultural technologies, ensuring that Nigeria's innovation ecosystem can generate, adapt, and deliver solutions that meet the needs of farmers, aggregators, and agribusinesses. The subcomponent builds a coordinated pipeline linking research institutions, private sector actors, and organized producer groups so that technologies can move efficiently from laboratories and trials into commercially viable use by farmers at scale. As part of Nigeria's Agriconnect Compact, this sub-component aims to deliver scalable solutions to improve research and extension services for technology transfer to smallholder farmers.

Sub-Component 2.2: Strengthening the Digital Agricultural Ecosystem (US\$45 million)

Sub-component 2.2 will strengthen Nigeria's digital agricultural ecosystem by building a comprehensive three-layer digital architecture that enables data-driven services across the sector, facilitating the delivery of timely, actionable advisory services to millions of farmers. This sub-component aligns with Nigeria's Agriconnect Compact to expand AgTech solutions like scalable digital tools for smallholder farmers (extension advisory, weather, market info) and satellite-based mapping technologies

Component 3: Policy and Enabling Environment for Private Investment in Inputs Markets and land tenure security

This component 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

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firms can deliver high-quality, productivity-enhancing inputs at scale. In line with Mission Agriconnect Compact, this component will strengthen the policy environment to facilitate agribusiness development. This component targets the upstream regulatory and institutional bottlenecks that determine whether private firms can deliver high-quality, productivity-enhancing inputs at scale.

Component 4: Project Coordination, Monitoring and Evaluation

This component will focus on all aspects of project management, including fiduciary and Environmental and Social risk management, Monitoring and Evaluation (M&E), knowledge management, gender, and communications. This component will finance the establishment of a Federal Project Coordination Unit (FPCU) based in the FMAFS. The FPCU will coordinate and provide overall oversight of project implementation in the eligible states, including overall monitoring and evaluation, fiduciary oversight, and ESF compliance. State-level activities will be carried out through relevant existing departments in state-level MDAs (or State Project Implementation Units), responsible for project implementation and monitoring and evaluation.

1.5 AGROW Project Implementation

At this stage, the specific locations of the proposed Nigeria Sustainable Agricultural Value-Chains for Growth (AGROW) have not been ascertained though the project will be implemented in selected few states. Presently, the Livestock Productivity and Resilience Support Project is providing support for the preparation of AGROW Project ESF documents in readiness for appraisal.

The AGROW project will be implemented by a lean and functional structure that reflects existing capacity, ensures accountability, and enables delivery timely. Oversight will be provided by the Presidential Food Security Coordination Unit (PFSCU) Steering Committee, which aligns the program with national priorities and secures political support for key decisions. At the federal level, the focus will be on driving national policy reforms and institutional strengthening, with a Project Coordination Unit (PCU) based in the Federal Ministry of Agriculture and Food Security (FMAFS). Each participating state will designate an existing department or agency serving as the State Project Implementation Unit (SPIU) to manage the program. While the specific location of the SPIU will be determined by each state based on its own administrative nomenclature and sectoral organization (e.g., agriculture, rural development, or related ministries), it must be anchored in an institution with demonstrated administrative capacity. This approach maintains flexibility while ensuring that the program is embedded in the state's governance framework.

CHAPTER TWO: INSTITUTIONAL AND LEGAL REQUIREMENT

2.1 Introduction

This chapter makes reference to relevant labour laws, policies and regulations that are applicable within the scope of work in accordance with the requirements of the Nigeria and World Bank requirement of ESS 2. These requirements are seen in the sub-sections below:

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2.2 Institutional Framework for Labour and Employment

Federal Ministry of Labour & Employment

The apex body in-country responsible for labour laws and legislation is the Federal Ministry of Labour and Employment (FML&E). The ministry has the authority and capacity to ensure appropriate labour management in the country; as such, its institutional framework is adequate to accommodate and oversee to the implementation of requirements under the World Bank's ESS 2 – Labour and Working Conditions.

The Ministry is structured into Six Zonal Labour offices, nine departments consisting of six professional and three service departments. It operates in 36 State Labour Offices and the FCT, 23 District Labour Offices, and the Labour Desk Office. Recently nine (9) labour desks were approved for nine ministries, departments and agencies. In addition, it oversees Five (5) parastatals and relates with several national and international bodies and organizations. Table 1 below summarizes the functions of some relevant departments within the ministry

Table 1: Summary of Relevance Departments in FML&E

Department	Offices
The Inspectorate	The Department is charged with the responsibility of ensuring compliance with all national and international Labour legislations connected with terms and conditions of employment, promotion of health and safety and sustenance of industrial peace and harmony. The department is also charged with the protection of children from child Labour especially in its worst forms.
The Social Security Department	The establishment of Social Security Department is to promote a coordinated and holistic approach to social security. The policy drafted by the NWC was in line with International Labour Organization (ILO) Convention 102, to provide a framework for international best practices based on set minimum standards. The policy is expected to provide the poor, weak and vulnerable an equitable access to medical care, employment, maternity care, survivor's benefits, etc. The department collaborates with relevant stakeholders to regulate a well-focused, coordinated and effective National Social Security System
Employment and Wages	The Department is charged with the responsibility of initiating and implementing the employment and wages policies of the Federal Government of Nigeria and has the following functions: Formulation and implementation of employment policies. Registration and placement of unemployed applicants; Employment Exchanges Professional and Executive Registries; National Electronic Labour Exchange Coordination of Decent Work Country Program Wages administration through; Wages Monitoring Processing of Collective Agreements; Issuance of Recruiter's Licenses. Labour migration management; Initiating and implementing programs on active aging Oversight functions over National Directorate of Employment
Office of the Registrar of Trade Union	The office is a unit in the Trade Unions Services and Industrial Relations Department, a statutory office created by Section 45 of the Trade Union Act CAP T8 LFN 2004. The Registrar has the primary responsibility for the effective administration of the Trade Unions Act. Hence, the office of the registrar of Trade Unions has the following specific responsibilities: Registration of trade unions; Cancellation of certificate of registration of trade unions; Supervision of trade unions account; Issuance of guidelines and circulars to registered unions, highlighting observed shortcomings in their obligations under the provisions of the Trade Unions Act for effective administration of the registered bodies. <ul style="list-style-type: none"> Promotion of workers' educational programs through lectures at trade unions, organized seminars, workshops, symposia and conferences.

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Department	Offices
	<ul style="list-style-type: none"> • Maintenance of records of registered offices, documents and particulars of registered unions. • Attendance at courts in respect of relevant Trade Union matters. • Collection of statutory fees as revenue for the government and paying the same into the government coffers.
Occupational Health and Safety	<p>The Factory Inspectors under the department are responsible for the enforcement of Factories Act 1990, Cap 126 Law of the Federation of Nigeria. They also oversee the implementation of several other subsidiary legislations, which provide for the safety, health and welfare of workers in all workplaces nationwide. The enforcement of Factories Act is done through:</p> <ul style="list-style-type: none"> • Registration of new factory premises, renewal of certificate of registration and amendment or revocation of certificate of registration. • Special Inspection of workplaces; • Investigation of accidents, dangerous occurrences and occupational diseases. • Preparation of safety and health regulations, code of practice, guidelines and standards for various operations, processes and hazardous agents. • Provision of occupational safety and health education to workers and employers. • Recording and dissemination of information and statistics on all aspects of occupational safety and health through the national Occupational Safety Health Information Centres (CIC). • Provision of technical assistance and advisory services to workplaces on HIV and AIDS interventions.

Specifically, the ministry has various laws for protecting all employees, relevant to AGROW and the Labour Act, Chapter 198, Laws of the Federation of Nigeria (LFN) 2004 covers general provisions including:

- Protection of wages
- Contracts of employment and terms and conditions of employment
- Fair treatment and equal opportunities for project workers.
- Hours of work and overtime
- Employment of women
- Labour health matters
- Prohibition of forced labour
- Labour complaints

2.3 Legal Framework for Labour and Employment

2.3.1 The Labour Act 2004

As indicated above, the following terms and conditions under the Labour Act are described in detail below

- **Protection of Wages:** the wages of all project workers shall be made payable in legal tender or with prior consent of both parties in cheque and not otherwise. Wages shall become due and payable at the end of each period for which the contract is expressed (daily, weekly or at such other period as may be agreed upon), provided the period is not more than one month, the wages shall become due and payable at intervals not exceeding one month.

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- **Contracts of Employment, Terms and Conditions of Employment:** no employer shall make any deduction or make any deductions from wages to be paid to project workers. An employer may, with the consent of a project worker, make deductions except with consent of the worker in terms of VAT, TAX, pension funds or other schemes as agreed by the worker and approved by the State Authority. Not later than three months after the beginning of a project worker's period of employment with an employer, the employer shall give to the worker a written statement specifying- (a) the name of the employer or group of employers, and where appropriate, of the undertaking by which the worker is employed; (b) the name and address of the worker and the place and date of his engagement; (c) the nature of the employment; (d) if the contract is for a fixed term, the date when the contract expires
- **Hours of work and overtime:** this shall be mutually agreed upon by both parties or by collective bargaining. However, the normal working hours shall not exceed eight hours at a time with a one-hour rest-interval. Where the project worker is at work for six hours or more a day, his work shall be interrupted by allowing one or more suitably spaced rest-intervals of not less than one hour on aggregate. Hours which a worker is required to work in excess of the normal hours fixed shall constitute overtime.
- **Benefits:** project workers shall be entitled to holiday with full payment of wages after twelve months of continuous service including sick leave. Other benefits are fair treatment and equal opportunities of project workers, employment of women, prohibition of forced labor, labor complaints

2.3.2 Factories Act, 1990; 2004

Factories Act, 1990: The Factories decree 1990 is a landmark in legislation in occupational health in Nigeria. It provides a substantial revision of the colonial legislation, Factories Act 1958, in which the definition of a factory was changed from an enterprise with 10 or more workers to a premise with one or more workers thereby providing oversight for the numerous small-scale enterprises that engage the majority of the workforce in Nigeria. It stipulates the enforcement of compliance on factories, industries and organizations that employ labour on the protection of the right of workers to friendly environment, health and safety.

Factories Act, Cap F1, LFN 2004: The Act -

- Provides a legal framework for the regulation of safety standards for the operation of factories in Nigeria; and
- Sets out minimum standards for clean and conducive working environments

Worker's Compensation Act (2010): The Act provides compensation to employees who suffer from occupational diseases or sustain injuries arising from accidents at workplace or in the course of employment. Payment of compensation (to the worker or to his dependents in case of death) by the employer is rooted in the accepted principle that the employer has a duty of care to protect the health, welfare and safety of workers at work. The specific amount will be determined by the board upon recommendation received from the National Council for Occupational Safety and Health Office in the State where the accident or disease occurred

Trade Unions (Amended) Act, 2005: Relevant provisions include:

- Membership of a trade union by employees shall be voluntary and no employee shall be forced to join any trade union or be victimized for refusing to join or remain a member”.

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- For the purposes of collective bargaining all registered Unions in the employment of an employer shall constitute an electoral college to elect members who will represent them in negotiations with the employer
- The right to strike is an integral part of the freedom of every citizen to associate with others particularly to form or join a trade union of his choice for the protection of his interests, which is entrenched in section 40 of the Constitution of the Federal Republic of Nigeria 1999.
- No person shall subject any other person to any kind of constraint or restriction of this personal freedom in the course of persuasion

2.3.3 The Child Rights Act, 2003

The Child Rights Act (2003): Codifies the rights of children in Nigeria (a person below the age of 18 years), consolidates all laws relating to children into a single law and specifies the duties and obligations of government, parents and other authorities, organizations and bodies. More particularly, the Act gives full protection to privacy, honour, reputation, health and prevention from indecent and inhuman treatment through sexual exploitation, drug abuse, child labor, torture, maltreatment and neglect to a Nigerian Child.

National Minimum Wage Act, 2010: National minimum wage in Nigeria is determined by the Government. Government is empowered to set up "industrial wages boards" for specific sectors or geographical areas where it considers wages to be "unreasonably low" or where there is no adequate collective bargaining machinery for the effective regulation of wages or other conditions of employment of those workers.

Generally, wage rate is determined by the applicable collective agreement or the agreement between the worker and the employer. Section 15 of the Labour Act states that wages shall become due and payable at the end of each period for which the contract is expressed to subsist (daily, weekly, monthly or at such other period as may be agreed upon) provided that where the period is more than one month, the wages become due and payable at intervals not exceeding one month. "National minimum wage is ₦70,000/month under the National Minimum Wage (Amendment) Act signed July 2024; some states implement higher floors. The Project will comply with the prevailing statutory minimum and applicable state decisions and adjust payroll when the three-year review cycle triggers (next review window begins 2027)."

National Policy on Occupational Safety and Health, revised 2020: This policy was approved by the Federal Executive Council (FEC) in September 2020. It provides a guide for voluntary compliance and serves as a basis for occupational health and safety (OHS) programs for workers even under such development projects like AGROW. An OHS Plan will be outlined in this LMP.

2.4 International Regulations

The project will be guided by the following international organizations regulations:

- Africa Regional Labour Administration Centre (ARLAC)
- International Labour Organization (ILO)
- Organization of African Trade Union Unity (OATUU)
- Africa Union, Labour and Social Affairs Commission (AULSAC)
- Organization of Trade Union of West Africa

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- Pan African Employers Association
- Pan African Productivity Association (PAPA)
- International Social Security Association (ISSA)

Their mandate is relevant to the AGROW Project, including:

- Development and promotion of productive employment policies and programs.
- Stimulation and enhancement of national Productivity Consciousness, rewards for excellence and promotion of national competitiveness.
- Skills Development, upgrading, certification, placement and empowerment of artisans, tradesmen and applicants in various areas of national needs.
- Provision of Social Security Coverage, Welfare and Employee's Compensation to the nation's workforce.
- Provision of Labour Protection Services, supervision, enforcement, Education, Promotion of Social Justice, Ratification, Implementation and Review of National Labour Laws and Policies.
- Trade Unions Education and Training.
- International Labour Diplomacy.
- Occupational Safety and Health.
- Administration of the Factories Act.

2.4.1 International Financial Institution requirements

In relation to this Plan, the most pertinent requirements which will guide the execution of this LMP are:

- Performance Standard 2: Labour and Working Conditions (International Finance Corporation, 2006) and ESS 2
- Workers' accommodation: processes and standards (European Bank for Reconstruction and Development and International Finance Corporation, 2009)
- Universal Declaration of Human Rights (United Nations, 1948)
- International Labour Organization Core Conventions
- United Nations Human Rights Council: Report of the Special Representative of the Secretary

2.5 World Bank Environmental and Social Framework

2.5.1 Environmental and Social Framework (ESF)

The World Bank Environmental and Social Framework sets out the World Bank's commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards that are designed to support this project, to end extreme poverty and promote shared prosperity. The applicable standards to the project are listed below

2.5.2 Environmental and Social Standards (ESSs)

This set out the requirements relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing. The application of these standards, by focusing on the identification and management of environmental and social risks, will sustainably support the project for the benefit of the environment and its citizens.

There are 9 out of the 10 ESSs applicable to the proposed project which include:

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- Environmental and Social Standard 1: Assessment and Management of Environmental and Social Risks and Impacts;
- Environmental and Social Standard 2: Labour and Working Conditions;
- Environmental and Social Standard 3: Resource Efficiency and Pollution Prevention;
- Environmental and Social Standard 4: Community Health and Safety;
- Environmental and Social Standard 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
- Environmental and Social Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- Environmental and Social Standard 8: Cultural Heritage
- Environmental and Social Standard 9: Financial Intermediaries
- Environmental and Social Standard 10: Information Disclosure and Stakeholder Engagement

Of importance to this assignment is the ESS 2: Labour and Working Conditions.

2.5.2.1 Labour and Working Conditions (ESS 2)

ESS 2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. The objectives are as follows:

- To promote safety and health at work
- To promote the fair treatment, non-discrimination and equal opportunity of project workers
- To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate
- To prevent the use of all forms of forced Labour and child Labour.
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law
- To provide project workers with accessible means to raise workplace concerns.

2.5.2.2 Main Gaps of the Nigerian Labour Legislation and the World Bank ESS2

Table 2 below describes the comparison between the Nigerian labour legislation and the ESS 2 including opportunities for synergy.

Table 2: Comparison and Synergy between National Labour Act and ESS 2

Area	Nigeria Labour Legislation	ESS 2 (LMP)	Synergy for the Project
Labour and working conditions	National legal framework is robust and implemented well in the formal sector. However, casual workers are not given the same benefits (such as compensation for injuries, right to belong to trade unions and bargain collectively, various social security	This standard makes provisions for borrowers to promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly	Labour Management Procedures (LMP) consistent with World Bank ESS2 and National Labour Laws for all categories of workers have been integrated in this LMP. In addition, this has been integrated in the project
	Benefit, unequal pay, forced Labour, absence of grievance redress mechanism).	Providing safe and healthy working conditions.	Environmental and Social Management Framework

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Area	Nigeria Labour Legislation	ESS 2 (LMP)	Synergy for the Project
	<p>There is no defined Labour Management Procedure to guide developmental projects.</p> <p>Lack of synergy between FMEnv. and Ministry of Labour limits the efficiency and effectiveness of Labour</p> <p>Inspections on projects, Low resources, capacity, standardized tools for effective implementation and monitoring of OHS standards</p>	<p>The standard recognizes that the project will make use of various categories of workers, direct and indirect workers who may face unfavourable terms and conditions of employment, discrimination, child labour, forced labour, grievances and unsafe working conditions.</p> <p>ESS2 provides procedures for managing these labour management risks and impacts.</p>	<p>(ESMF) and the Environmental and Social Commitment Plan (ESCP) includes Governments commitment to issues relating to labour and working conditions</p>
Terms & Conditions of Employment	The country's labour law recognizes that employers must provide the employee with clear agreement terms within the engagement letter termed "Contract Agreement" whether written or verbal within the first 3 months	Provisions of clear information and documentation are provided at the onset of working relationship	specific measures documented in this LMP will be adopted.
Minimum age	Sixteen years and above	Minimum age of fourteen years and above but under special condition; A child over the minimum age and under the age of 18 will not be employed or engaged in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development.	Given the nature of the project whereby potential OHS risk are envisaged, the Nigeria Labour legislation works in this instance. "AGROW adopts a project minimum age of 18 for all workers. Verification via government-issued ID (NIN, birth certificate, passport). Any under-18 identified will be disengaged safely and referred to education/social services."
Workers' organization	The national legal framework is robust and implemented well in the formal sector, however, casual workers are not given the same benefits (such as compensation for injuries, right to belong to trade unions and bargain collectively, various social security benefit, unequal pay, forced Labour, absence of grievance redress mechanism)	This standard makes provisions for borrowers to promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. It ensures access to an effective GM an effective GM and non retaliation for registering complaint	The project will implement the ESS2 provisions in this regard. The National legal framework does not have adequate provision for Grievance Redress Mechanism (GRM), and there is no sufficient consideration for casual workers in terms of workers' organization
Non-discrimination and Equal Opportunity	There is no defined Labour management procedure to guide developmental projects	The standard promotes fair treatment, non-discrimination and equal opportunity of project workers. It provides appropriate measures of protection and assistance to address the vulnerabilities of project workers, including specific groups of workers, such as women, people with disabilities, migrant workers and children of working age in accordance with ESS2	The LMP will take precedent

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Area	Nigeria Labour Legislation	ESS 2 (LMP)	Synergy for the Project
	Lack of synergy between FMEnv and Ministry of Labour limits the efficiency and effectiveness of Labour risks on projects	Procedures for managing these Labour management risks and impacts are infused herein	
	Low resources, capacity, standardized tools for effective implementation and monitoring of OHS standards	Adequate OHS Procedures are set out according to ESHS	
	No provision in Labour Act that prohibits sexual harassment or any other kind of harassment during employment. If an employee consider that the employer is harassing him/her, the employee can terminate the employment contract by providing the giving an appropriate notice. However, if an employer terminates the employment contract, it is not considered as harassment because the Nigerian law clearly states that the employer can terminate the employment contract for any reason or may be for no reason at all.	The procedure forbids sexual harassment of any kind	
Forced Labour	Any person who requires any other person, or permits any other person to be required, to perform forced labour contrary to section 34 (1) (c) of the Constitution of the Federal Republic of Nigeria 1999, shall be guilty of an offence and on conviction shall be liable to a fine not exceeding N1,000 or to imprisonment for a term not exceeding two years, or to both.	All work associated with this project shall be performed voluntarily without coercion or any form of threats. Forced labour in this context can be any form of indentured labour	There will be periodic Screening Checks by the Supervision consultants and SPIU on monitoring for Forced Labour
Protection of Wages	Wages shall become due and payable at the end of each period that is to say daily or weekly or monthly No employer shall make any deduction or make any agreement or contract with a worker for any deduction from the wages to be paid by the employer	Same	Wages will be paid in tandem with national requirements and also as agreed by the SPIU safeguards team for unskilled labor The contractor will implement a Workers Grievance Redress Mechanism to address workplace grievances that may arise because of irregularities in the payment of wages.
Hours of Work	Working hours shall not exceed 8 hours or as agreed mutually or by collective bargain	Same	8/9 hours will be the recommended work hours per day. However, where workers have to conduct overtime, they will be duly compensated. A Staff Register will be maintained in all work locations to capture worker time of resumption and departure Every worker will observe a n hour break/rest period daily Workers will be allowed to observe key religious

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Area	Nigeria Labour Legislation	ESS 2 (LMP)	Synergy for the Project
Provision of Water and Sanitary amenities	national OHS framework cover workplace health and safety broadly and only emphasize worker safety and roles/responsibilities of employers	Adequate, safe drinking water is part of the “safe and healthy working conditions” obligation under ESS2. It recommends provision of adequate sanitary and washing facilities proportional to workforce size and gender considerations	activities ESS 2 provisions will apply
Provision of medical facility	The Employees Compensation Act (2010) provides for compensation and treatment post-incident	A proactive OHS management system such as hazard identification, prevention, emergency, first aid arrangements and facilities on site, preparedness and response, trained first-aiders, incident reporting, and alignment with WBG EHS Guidelines.	ESS 2 provisions will apply

2.6 Policies, Treaties and Legislation on GBV

The Federal Ministry of Women Affairs and Social Development (FMWASD) was established by Decree No. 30 of 1989 and is mandated to advise the government on gender and children issues, including those affecting persons with disabilities and the elderly. The Ministry also initiates policy guidelines and leads the process of ensuring gender equality and mainstreaming at both the national and international levels.

2.6.1 National Gender Policy (Revised 2022)

The revised National Gender Policy 2021 – 2026, approved in March 2022, promotes gender equality, good governance, and accountability across the three tiers of government in the country. Provides a framework for ensuring gender inclusion and sensitivity in developmental plans and programs at the national and sub-national levels. It sets standards for good governance, accountability and being socially responsive to the needs of vulnerable groups. The goal includes the elimination of cultural/ religions gender-based biases and harmful cultural and religious practices which rise to inequalities in gender-role relations in the Nigerian society, by ensuring: ensure equal access to women, boys and girls to both formal and informal education; ensure that women have access to critical resources and invest in their human capital as a means of reducing extreme poverty in families; and eliminate the high risks linked to many harmful traditional cultural practices, which still put threaten the health of women.

2.6.2 National Strategy to End Child Marriage in Nigeria (2018 – 2021)

The National Strategic Plan to End Child Marriage in Nigeria 2018-2021 aims to highlight the multi-sectoral, multifaceted activities needed to end child marriage in Nigeria. It is based on the premise of a coordination platform led by the Federal Ministry of Women Affairs and Social Development and co-chaired by Save the Children. The vision of the national strategy is to end child marriage in Nigeria by 2030. It contains the conceptual frameworks used in understanding the drivers of child marriage, situational analysis, key identified strategies to address the drivers of child marriage and gender inequality, as well as a monitoring framework. The strategy was launched in Abuja on 29 November 2018, alongside the African Union Campaign to End Child Marriage in Africa.

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2.6.3 The Violence Against Persons Prohibition (VAPP) ACT 2015)

The VAPP Act was signed into law on 23rd May 2015. This act prohibits all forms of violence against private and public life and provides maximum protection and effective remedies for victims and punishment of offenders. Nigeria's national government has taken steps to penalize and address GBV and SEA, although a clear leadership with the leverage to garner multi-sectoral support to address this complex problem seems absent.

2.6.4 The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) (1984)

Discourages the discrimination against women by any distinction, exclusion or restriction made based on sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, on a basis of equality of men and women, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field.

2.6.5 The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) (2012)

Adopts a broad categorization of persons with disabilities and reaffirms that all persons with all types of disabilities must enjoy all human rights and fundamental freedoms. It clarifies and qualifies how all categories of rights apply to persons with disabilities and identifies areas where adaptations have to be made for persons with disabilities to effectively exercise their rights and areas where their rights have been violated, and where protection of rights must be reinforced.

CHAPTER THREE: OVERVIEW OF LABOUR USE IN AGROW PROJECT

3.1 Introduction

The proposed AGROW Project, will utilize all the types of workers under ESS2 termed Project Workers (i.e direct workers, contracted workers, primary suppliers, and community workers) to be engaged by the project.

- Direct Workers refer to: (a) people employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project.
- Contracted Workers: people employed or engaged through third parties to perform work related to core functions of the project or any type of function required, regardless of location
- Primary Supply Workers: people employed or engaged by the Borrower's primary suppliers

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- Community Workers: people employed or engaged in providing community labour

The LMP applies to all Project workers whether full-time, part-time, temporary, seasonal or migrant workers. The requirements of ESS 2 will apply to all Project Workers but exclude government workers/civil servants working in connection with this project except there is a legal transfer of their employment or engagement to this project.

3.2 AGROW Project Component

The proposed Project Development Objective (PDO) of AGROW is increase smallholder productivity and private sector investment in agriculture for greater food and nutrition security and job creation in participating states of Nigeria. . The project includes the provision of infrastructure, greater application of inputs to raise productivity and the need to employ labor at the local level, promoting farmer-led irrigation development (FLID) and catchment conservation approaches, institutional capacity building, and value chain-specific support. AGROW project aims to address the critical challenges that affect the 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.

3.2.1 Project Components

The proposed interventions are categorized under four main components as captured in chapter one of this LMP and highlighted below:

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

Component 2: Public Investments for Modernizing Smallholder Production

- Sub-Component 2.1: Strengthening Research, Extension, and Technology Transfer Systems
- Sub-Component 2.2: Strengthening the Digital Agricultural Ecosystem

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

Component 4: Project Coordination, Monitoring and Evaluation

3.3 Types of Workers

The AGROW Project activities will include different categories of workers, who will be engaged in different activities directed towards the realization of the PDO. With regards to ESS2, the project workers can be classified into the following four groups: direct workers, contracted workers, primary suppliers and community labourers. Due to the nature of the work that will be done in this project, direct and contract workers will be mostly used for the implementation. However, at the state level there may be potential use of primary suppliers at different stages of the project. The engagement of these different categories of workers is described below.

A. Direct workers

This category of workers will comprise a mix of government civil servants from various relevant line ministries and those deployed as technical consultants – full and part-time by the FPCU and SPIUs – under the project. The former will be governed by a set of public service rules, the latter by mutually agreed contracts. Oversight will be is provided by the Presidential Food Security Coordination Unit (PFSCU) Steering Committee, which aligns the program with national priorities and secures political support for key decisions. A dedicated AGROW Technical Committee will lead the technical design, driving workstreams, validating outputs, and ensuring coherence across stakeholders. In addition, selective focus groups are convened on a thematic or zonal basis to draw on expertise from relevant ministries, state governments, private sector actors, and development partners, ensuring the program’s design is both inclusive and technically robust. Leveraging on the proposed project activities, direct workers typically include those seconded from relevant ministries such as the National Coordinator, Engineers, Procurement Officer, Internal Auditor, Accountant, Monitoring & Evaluation Officer, Gender Officer, Environmental Safeguard Officer, Social Safeguard Officer, GBV Officer, Communications Officer, administrative officers, storekeeper, drivers, and technical assistants on infrastructure, safeguards, monitoring and evaluation. The implementation of AGROW will follow a set of principles that ensure clear, efficient, and decentralized roles across federal and state levels. At the federal level, the focus will be on driving national policy reforms and institutional strengthening, with a Federal Project Coordination Unit (FPCU) based in the Federal Ministry of Agriculture and Food Security (FMAFS). The FPCU will work closely with the National Agricultural Seed Council (NASC), relevant research institutions, and other stakeholders. The National Governors Forum (NGF) will serve as a strategic partner to support coordination and alignment across states

At the various states where the project will be implemented, a State Project Implementation Unit (SPIU) will be constituted to implement day-to-day coordination, management and monitoring of the project components While the specific location of the SPIU will be determined by each state based on its own administrative nomenclature and sectoral organization (e.g., agriculture, rural development, or related ministries), it must be anchored in

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an institution with demonstrated administrative capacity. This approach maintains flexibility while ensuring that the program is embedded in the state's governance framework.

B. Contracted workers:

Two broad categories of contracted workers are expected. First is Consultant service providers who will provide implementation support services to the PCU and SPIU. Second is the staff of civil works contractors to be subcontracted to arrange for civil works under the subprojects (especially for the activities under component 3 for upgrade of NASCs laboratories and construction of a reference laboratory for fertilizer quality testing in participating states, construction of center of excellence for seed technology and seed bank and related infrastructure). ---

C. Community Workers:

The project may adopt the modality of community-led construction for semi-skilled or unskilled civil works. This category of workers may include community members, community associations, farmer associations, youth groups etc. who mobilize themselves to support aspects of the project as part of their contribution to the development, whether paid or unpaid. The SPCU will liaise with LGA to source for such works locally from the project community. The Project will pay specific attention to ensure that forced and child labour are totally avoided, conduct sensitization and training of community workers on OHS risks, and the technical knowledge and behavioural awareness to minimize the risks and ensure they have access to grievance mechanism.

D. Primary Suppliers

Primary supply workers are those who are employed or engaged by a primary supplier providing goods and materials for the project. They are likely to include suppliers of construction materials for any civil works to be supported by the project, as well as agricultural equipment/supplies that may be used to improve the learning component of the project. The SPIUs will ensure that all suppliers and contractors engaged to work on the AGROW project are assessed to ensure compliance with the required environmental and social standards. The assessment shall be embedded in the tendering, hiring and contracting processes, and any due diligence measures required in the sourcing of contractors and suppliers for the project activities. The contractual documents for suppliers require explicit Codes of Conduct to be signed by the contractors/suppliers and all workers. Periodic mandatory training of all workers on Sexual Exploitation and Abuse and signing of Code of Conduct shall be carried out. The contractor shall develop a Gender Based Violence (GBV) Action Plan including an Accountability and Response Framework to be included in the contractor ESMP

“Where significant risks of **child/forced labour** or serious safety issues are found among **primary suppliers**, the SPCU will require **time-bound corrective actions**; if ineffective, the project will **shift to compliant suppliers** and notify the Bank.”

3.4 Number of Project Workers

At the point of preparation of this LMP, the exact locations where the AGROW Project will be implemented are not yet known. Hence, identifying the number of potential workforces required is impossible. When sub-projects are known, site-specific Labour Management

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Procedures will be prepared as a part of the Environmental and Social Impact Assessment/Environmental and Social Management Plans. Nonetheless, labour is anticipated to emerge during project implementation (for the provision of infrastructure, greater application of inputs to raise productivity), promoting farmer-led irrigation development (FLID) and catchment conservation approaches Table 3 below provides an estimated labour requirement for civil works

Table 3: Estimated Labour requirement for a particular state/location including PCU

Project Phase	Activities	Needed Labour	Duration
Project Planning and Preparation	Preparation of Documents, Recruitment of Consultants	Civil servants = 15 Consultant = 5	0-2 months
Pre-construction	<ul style="list-style-type: none"> Site marking and pegging, Site clearing and removal of vegetation Mobilization of equipment and workers to site Establishing of staging area and campsite 	<ul style="list-style-type: none"> Skilled labour (estimated = 10) Semi skilled and Unskilled Labour (estimated 30) 	0-4 months
Construction	<ul style="list-style-type: none"> Partial demolition Installation of traffic signage and cautions on site Repairs of canals, feeder roads Disposal of agricultural waste 	<ul style="list-style-type: none"> Skilled labour (estimated = 10) Semi skilled and Unskilled Labour (estimated: 60) 	0-6 months
Demobilization	<ul style="list-style-type: none"> Site demobilization activities Disposal of construction spoil and waste in general; Dismantling of temporary work camp of the contractor (where available); 	<ul style="list-style-type: none"> Skilled labour (estimated = 5) Semi skilled and Unskilled Labour (estimated: 60) 	0-3 months

3.5 Terms and Conditions of Employment

Terms and conditions of direct workers are determined by their individual contracts and public service rules (for government staff). Most of the government staff who will be deployed to the project will be seconded from their parent ministries. The Civil Service sector in Nigeria is guided by terms and conditions stipulated in the Public Service Rules PSR, 2021 Revised edition) and the Labour and Employment Act. A summary of the PSR and Labour Act can be seen below.

Work hours: the PSR and Section 13 of the Labour Act state that hours of work and overtime shall be fixed by mutual agreement or collective bargaining. Hours of work which extend 6 working hours per day shall include an hour for rest. The Act makes a provision of total 48 (forty-eight) working hours for a worker, but it can be extended up to sixty hours, subject to the mutual agreement with payment for overtime allowances.

Wages: means all economic benefits, including salary, any bonus, and remuneration for overtime work, holiday or leave, termination of employment or other additional remuneration payable under the terms of employment. Every employer is responsible for the payment of wages to labourers employed by them. Wages shall become due and payable at the end of each period for which the contract is expressed to subsist, that is to say daily, weekly or at such other period as may be agreed upon, provided the period is not more than one month. Wages of a

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worker shall in all contracts be made payable in legal tender and not otherwise. “National minimum wage is ₦70,000/month under the National Minimum Wage (Amendment) Act signed July 2024; some states implement higher floors. The Project will comply with the prevailing statutory minimum and applicable state decisions and adjust payroll when the three-year review cycle triggers (next review window begins 2027).”. In line with the National minimum wage, weekday overtime of ₦597 per hour and weekend or holiday overtime pay of ₦796 per hour will be paid to workers as overtime payment.

Employees Union: Employees are allowed to make unions to establish and ensure their rights

Regular leaves and benefits: According to the Act, every worker must enjoy paid sick leave, casual leave, and festive holiday.

Maternity leave: Female workers will get paid maternity leave. “Private sector: 12 weeks (6+6) with $\geq 50\%$ pay per Labour Act for eligible workers. Federal civil service: 112 working days paid maternity leave per PSR 2021, with one month ante-natal mandatory. No dismissal on grounds of pregnancy; nursing breaks provided.”

Safe work environment- Health/ Safety/ Welfare: Every industrial unit having more than 25 labourers must have arrangements for a dining and rest room with facilities of drinking water. This

act also ensures employee safety, health and resolves any kind of disputes and unfairness.

Notice Periods: A permanent employee at a company must give his/her employer 14 days’ notice if s/he wishes to quit or one month's notice if the employee is paid to the employer.

The Contractors’ Labour Management Procedure will set out terms and conditions for the contracted and subcontracted workers. These terms and conditions will be in line, at a minimum, with this LMP and the General Conditions of the World Bank Standard Procurement Documents.

3.5.1 Characterization of Labour requirements

Given the nature of the project, workforce will comprise of skilled, semi-skilled and unskilled labour, technical staff, community representatives and government civil servants. The Project will also support states and local governments to hire registered transporters for ease of movement of cash crops, goods, seeds and fertilizers etc to selected agribusiness hubs. These transporters will sign codes of conduct and ethics (see annexe 3 for sample) that would help safe transportation for their workers and relevant residents. ---

3.6 Timing of Labour

- Direct workers are government employees or consultants directly working on the project. Consultants will be engaged for a short-term period between six months and one year depending on request. The labour requirements, including the time schedule and deliverables, are stipulated in their respective contracts.

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- Contracted workers are eligible to work for a contract period fixed by the NPCU and then recruited by the Contractor. Their contracts will be renewed, if required, based on satisfactory services.
- Primary Supply Workers tenure service will be based on supplies as procured on their relationship with the project.

CHAPTER FOUR: ASSESSMENT OF KEY POTENTIAL LABOUR RISKS

4.1 Potential Risks and Impacts

The proposed project activities will include minor to major civil works during modernization of on-Farm Production Across Value-Chain such as support deployment of a menu of interventions, depending on the agro-ecological zone and value-chains, including among others, (i) high-yielding crop technologies; (ii) climate-smart production practices; (iii) agricultural water management technologies, including promoting farmer-led irrigation development (FLID) and catchment conservation approaches, (iv) appropriate mechanization through private sector leasing models for equipment, (v) farmer-field schools for demonstration and dissemination of appropriate high-yielding and climate smart technologies and production practices. Significant use of labour is expected to arise during the civil works, and project workers will be involved in a number of activities that include movement of equipment and

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materials to site. Creation of staging areas and base camps, removal of vegetation, irrigation development, development of basic market structures, e.t.c.

Some of the potential labour risks and impacts associated with the proposed project include:

- Unfair recruitment and selection practices which could discriminate against women, vulnerable groups
- Exploitative wages
- Over-stretched working hours – no break periods
- Poor work safety culture, accidents/incidents, and Lack of provision of PPEs
- Perception that wages, salaries and benefits are poor or that foreigners are treated better and receive better conditions of employment
- Forced Labour
- Child Labour
- Gender-based violence (GBV) risks as a result of the contractor workforce during civil works
- Workplace sexual harassment, especially for newly recruited teachers
- Lack of provision of basic facilities – water, food, toilets, washing hand facilities, medical aid
- Sub-standard campsite facilities and campsite management
- Hostility and security threats from the host community
- Cultural differences may cause conflicts
- Lack of unified rules and regulations for all workers
- Favouritism
- No grievance redress channel for workers
- Dismissal from work

4.2 Potential Labour Risks and Mitigation Plan

Table 4 below presents a plan to be adopted in the management of labour risks for the project. The Contractors company/management will be responsible for making provisions to ensure implementation of the LMP, developing corrective action for any default and administering appropriate sanctions. The SPIUs will monitor the contractor's compliance to the LMP.

Table 4: Potential Labour Risks and Mitigation Measures

Risks/Impacts	Analysis	Mitigation
Poor working conditions (unsafe work environment, underpayment, lack of workers' rights, etc.)	<p>The Rights of workers under the Labour and employment Act (which will include any applicable collective agreements), may be abused. Workers' payment may be delayed, irregular, or may be underpaid.</p> <p>Campsites may be poorly managed, in conducive for workers, insecure, poor sleeping conditions, lack of access to basic amenities like water, toilets, healthcare etc.</p> <p>The general appearance of the camp deteriorates making camp life unpleasant</p>	<p>Project workers will be paid on a regular basis as required by Labour and employment Act (with a principle of "equal pay for equal work")</p> <p>In the case of subcontracting, the Borrower will require such third parties to include equivalent requirements and non-compliance remedies in their contractual agreements with sub-contractors.</p> <p>The SPCU shall inspect the campsites to ensure workers have appropriate living quarters, sanitation facilities separate for male and female, basic amenities</p> <p>All project workers will be provided with adequate periods of rest per week, annual holiday and sick leave, as required by national law.</p>

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Risks/Impacts	Analysis	Mitigation
		Ensure that campgrounds and common areas are routinely cleaned and organized with appropriate signage in place, and that grounds are maintained (e.g., grassed areas are regularly mown).
	Decisions relating to the employment or treatment of project workers may discriminate against certain classes of workers including women, vulnerable groups amongst others.	The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation
Discrimination and Unequal opportunity	Decisions relating to the employment or treatment of project workers may discriminate against certain classes of workers including women, vulnerable groups, ethnicity, religion, amongst others.	The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job description, promotion, termination of employment or retirement, or disciplinary practices.
	Payment of workers may be based on discrimination e.g. male may be paid higher than women even on the same level of job schedule.	Working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices.
	Foreign workers may be treated better than local workers in terms of living conditions, unequal pay, varying closing time etc. even when they are on the same level of qualification and experience	The SPCUs are compelled to safeguard the interests of women and girls, including gender parity at the workspace, appropriate sanitation facilities at workplace and appropriate PPEs for women.
Arbitrary decisions by contractors on Terms and Conditions of employment	The duration of the contracts offered to contractor workers are short and may not allow employees adequate time and information for meaningful collective bargaining, leading to discontent of employees and disputes.	The State Project Coordinating Unit (SPCU) will closely supervise the Contractor Recruitment Plan and ensure fairness of Employment Terms and Conditions against the applicable and prevailing National stipulations.
	Project workers may not be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment.	All information and documentation must be provided at the beginning of the working relationship and when any material changes to the terms or conditions of employment occur. Where applicable, project workers will receive written notice of termination of employment and details of severance payments in a timely manner
Child labour	There is a risk that children (below the age of 18) will be used as Labour in the project. Under-aged persons within the community may disguise as above 18 to enable them work and get paid	The minimum age of eighteen (18) will be enforced at recruitment and in daily staff team talks by Contractors. SPIU will also supervise this through the Contractor Management Checklist. Contractors will liaise with community liaise to attest to the age and conduct of all local hires, and maintain a list of same. Hired project workers above 18 shall conduct his/her activities in ways that are not detrimental with respect to education or be harmful to the child's health or physical,

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Risks/Impacts	Analysis	Mitigation
		mental, spiritual, moral or social development
Forced labour	There is a risk that there could be involuntary or compulsory Labour, such as indentured Labour, bonded Labour, or similar Labour-contracting arrangements. This prohibition covers any of these.	Contractors will ensure that no forced labour exists in the project by gathering documents and appropriate proof. A consent section will be part of the employee signed employment contract. Contractors will ensure that if labour is sourced from any subcontracting agency, the workers are not subject to coercion and forced Labour conditions.
OHS	<p>Dust and particulate emissions and welding works from the civil works site may cause respiratory and eye impairment health concerns for workers and the public, and may also cause risk of accident, injury and death.</p> <p>There could be likelihood of Unsafe and unhealthy work environment resulting to injuries, incidents and accidents.</p> <p>Movement of trucks carrying sand and materials, and a lack of road safety measures.</p> <p>Site workers will be exposed to risks of accidental collisions with moving vehicles, strains, and ergonomics from repeated movements or from lifting of heavy objects, slips and falls.</p> <p>Accidental cuts from tools and machines are also safety risks.</p>	<p>First aid boxes should be provided at the construction site, staging area and mobile.</p> <p>Contractors will implement the project Occupational Health and Safety Plans.</p> <p>Contractors should provide HSE training for all workers before commencement of work and periodically (see sample training plan in annex 4)</p> <p>Maintain a safe working environment, including workplaces, machinery, equipment, and processes under their control are safe and without health risk, including by use of appropriate measures relating to chemical, physical and biological substances and agents.</p> <p>Where required, hire security for workers</p> <p>Every site should have emergency prevention, preparedness and response arrangements to emergencies.</p> <p>All contractors should have full-time HSE officers on their team</p> <p>Contractors should provide adequate PPEs for all their workers, and the contractors' HSE officers should enforce compliance</p>
Right of Association	<p>Workers have the right to freely form, join or not join a trade union for the promotion and protection of the economic interest of that worker</p> <p>Workers have a right to organize, collective bargaining, and representation</p>	<p>The SPCU will ensure that workers are informed of their right of association and collective bargaining</p> <p>The SPCU should also inform workers of the workers GRM and their right to utilize the system</p>
Termination of employment and disciplinary actions	<p>Termination of appointment should abide by the following principles:</p> <ul style="list-style-type: none"> Valid or reasonable; Clear and unambiguous; The employee is aware, or could reasonably be aware of the rule or standard; and 	<p>The SPCU should periodically review workers disciplinary and termination processes to ensure that they are executed fairly and without prejudice</p> <p>Where unfair treatment is established the</p>

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Risks/Impacts	Analysis	Mitigation
	<ul style="list-style-type: none"> The procedure to be applied in the event the employee contravenes any of these rules <p>The disciplinary process should be laid out before commencement of work and explained to every worker</p>	SPCU should put in place corrective action and follow up to ensure execution
Contractors management	<p>Records of workers engaged under the Project, including contracts must be kept</p> <p>Records of all training attended by workers including CoC, HSE, STIs/STDs, GBV etc.</p> <p>Accidents/ incidents and corresponding root cause analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (Corrective Action Register)</p> <p>Records of strike actions, reasons and resolution reached</p> <p>Records of grievances and how they were resolved</p>	<p>Documents should be kept at the site office with the site engineers and SPCU office</p> <p>The FPCU team should check these records during monitoring visits</p>
Grievance mechanism	Workers may be aggrieved due to unfair treatment, poor working conditions, conflicts, poor pay, over-stretched working hours amongst other things. Lack of channel for grievance management and response for workers may worsen the situation.	<p>Contractors shall implement a workers GRM in line with the provisions of ESS2 defined to handle workers grievances in a fair and timely manner.</p> <p>The SPCU shall provide oversight to ensure effective implementation of the GRM.</p>
Labour influx	<p>The project may face influx of Labour to local communities especially where skilled labours are not available in some project sites.</p> <p>This could lead to Increase in potential spread of STIs/STDs, HIV/AIDs due to workers on site, increase in GBV/SEA especially for Girls been exposed to contractors, sexual relations between contractors and minors and resulting pregnancies, encourage presence of sex workers in the project communities.</p> <p>This could also lead to competition for resources like water, health facilities, electricity in the project locations</p>	<p>Encourage hiring of Labour from the host communities. Maintain Labour relations with local communities through a Code of Conduct (CoC) (see sample CoC in annex 2).</p> <p>The Code of Conduct must be signed by all categories of workers.</p> <p>Workers must be trained on the provisions of the CoC about refraining from unacceptable conduct toward local community members, specifically women and informed of the sanctions for non-compliance.</p> <p>Training must be conducted for all new hires including sub-contractors.</p> <p>Contractors should make resources available for their workers especially where stated in the ESMP</p>
Primary Suppliers	Primary suppliers could also have occupational injuries, incident/accidents while performing project related functions	Contractors will ensure that measures such as clear contractual OHS obligations, supplier OHS management systems, training, hazard controls, incident reporting and emergency preparedness are put in place by its primary suppliers. Where serious safety issues persist, he will remediate or replace suppliers that cannot meet the requirements.

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4.3 Gender Based Violence

Nigeria, with its wide diversity and distinct socio-economic ranks 118 out of 134 countries on the Gender Equality Index.² The geopolitical regions and states in-country have different gender related vulnerabilities. Nigerian women are disadvantaged in position and lack of decision-making power in the social, economic, and political spheres is reflected in policies, laws and resource allocation that thwart progress towards gender equality in the country. More than 70 per cent of women live below the poverty line, and the maternal mortality ratio is among the highest in the world at 576 per 100,000.³ More than half of the people living with HIV (3.2 million) are women (55 per cent).³

While gender inequitable norms prevail throughout the country, these vary by region and interact with other structural, community, and individual factors, exposing women, girls, and boys to some forms of GBV more than others. The socioeconomic status of women and girls in the northern zones lags behind those in the south: only 3 per cent of girls in the North complete secondary school, over two-thirds aged 15-19 years are unable to read compared to less than 10 per cent in the South, and 76 per cent are married by age 18 in the northwest.⁴ Child marriage, acceptance of wife beating, restricted movement of women and girls are more pronounced in the North, and the prevalence of sexual violence, conflict-related GBV, and SEA is higher than in the South. In the South, FGM, IPV, physical violence by any perpetrator, trafficking, and harmful widowhood practices are more prevalent.

4.3.1 Manifestations of GBV in AGROW Project

To understand if an act of violence is an act/manifestation of GBV, one must consider whether the act reflects and/or reinforces unequal power relations between males and females. Many—but not all— forms of GBV are criminal acts in Nigeria laws and policies

- Physical Violence (such as slapping, kicking, hitting or use of weapons)
- Emotional abuse (such as systematic humiliation, controlling behaviour, degrading treatment, insults, and threats);
- Sexual violence, which includes any form of non-consensual sexual contact, including rape;
- Early/forced marriage, which is the marriage of an individual against her or his will often occurring before the age of 18, also referred to as child marriage;

² British Council Nigeria. [Gender in Nigeria report 2012](http://genderinigeria.org/2012/); UNDP Human Development Report 2018. See: <http://hdr.undp.org/en/content/gender-inequality-index-gii>. ³ The 2013 Nigeria Demographic and

Health Survey (NDHS). See: <https://dhsprogram.com/pubs/pdf/PR41/PR41.pdf>.

³ UNAIDS 2017 Data. See: http://www.unaids.org/sites/default/files/media_asset/20170720_Data_book_2017_en.pdf.

⁴ NDHS 2013; British Council Nigeria, 2012.

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- Economic abuse and the denial of resources, services, and opportunities (such as restricting access to financial, health, educational, or other resources with the purpose of controlling or subjugating a person);
- Trafficking and abduction for exploitation

4.3.2 Mitigations of GBV in AGROW Project

A stand-alone GBV assessment will be prepared for the project with defined action plans and the Government will include commitments on GBV in the Environmental and Social Commitment Plan (ESCP) and ensure that funds are made available timely for implementation of such action plans. The PCUs will include in the bidding documents ('pre-qualification' and 'employers' requirements') key principles and specific requirements to address GBV to reduce and mitigate the risks of GBV especially during project implementation. Such measures will include:

- GBV/SEA assessment of project with attendant mitigations actions and costs;
- Mandatory contractors' code of conduct on sexual harassment;
- Monthly site visit by the safeguard unit/GBV officer to monitor GBV/SEA during construction/implementation phase;
- Community and workers' sensitization on GBV/SEA;
- Provision of referral units for survivors of GBV/SEA;
- Provisions in contracts for dedicated payments to contractors for GBV/SEA prevention activities against evidence of completion;
- Contractor and SPIU requirement to ensure a minimum target of female employment with incremental rewards of the obtainment of this target.

The project is expected to comply with the GBV assessment and action plans that will be developed for the project.

4.4 Security Risk Management

Given the notable security challenges in certain parts of the country, the project will undertake appropriate and proportionate security measures to minimize the potential risk to the workers, as detailed in the project and site-specific Security Management Plan (SMP) to be developed/updated by the SPIUs and contractors respectively. Key security measures will include:

- i. Temporary avoidance of high-risk areas until the area is adjudged safe by the state security advisers or law enforcement agents.
- ii. restrictions on work hours where security risks are higher (such as avoidance of nighttime work beyond 5 pm or as prescribed by the state/area security officers) including local workers.
- iii. measures to maintain low profile of the site and workers (such as the minimum use of sign boards and uniforms)
- iv. project workers making intercity/state travels to maintain a road travel time of 8 am to 4pm.

While security measures to be arranged in coordination with public security personnel to address external security risks (such as armed insurgency) will be determined by relevant security authorities engaged in each location and in line with the updated Security Risk

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Assessment for participating states obtained for State's Security Advisers, the project will ensure internal security risks associated with the deployment of such security personnel on the community and guarding of project workers is in line with the WB Good Practice Note “Assessing and Managing the Risks and Impacts of the Use of Security Personnel” (such as the training of security officers on the principles of proportionality in the use of force).⁵ “Any engagement of public or private security will follow the **World Bank Good Practice Note (2018): vetting**, training (human rights, proportional use of force, GBV/SEA), **community liaison**, incident reporting/remedy, and a **Security Management Plan** proportionate to risk.”

⁵ <https://documents1.worldbank.org/curated/en/692931540325377520/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Security-Personnel-English.pdf>

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CHAPTER FIVE: POLICIES AND PROCEDURES FOR LABOUR MANAGEMENT

5.1 Introduction

Decisions relating to the employment or treatment of project workers in AGROW project will not be made on the basis of personal characteristics unrelated to inherent job requirements. The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices. These are embodied in the provisions of the World Bank ESS2: Labour and Working Conditions, International Labour Organisation (ILO), ISO 45001 standards, the Nigeria Labour Act, 2004 and other regulations as outlined in this LMP

5.2 Policies

The guiding policies for this LMP include the following:

- The terms and conditions of employment shall be outlined in clear and understandable terms, ensure fairness of employment terms and conditions against the applicable and prevailing National stipulations for all workers.
- All civil servants deployed to work on the project shall be given official letters of deployment by their parent ministries.
- Contractors shall provide safe and healthy working conditions for workers, void of worker exploitation, and shall ensure provision of standard facilities.
- SPCUs and contractors shall conduct job hazard and risk assessment and implement actions to address such risks.
- Contractors shall provide adequate work tools and personnel protective equipment to all workers.
- There shall be non-discrimination and 1 opportunity provided for all workers.
- Timely and adequate training on OHS/HSE shall be provided to all workers. (HSE training plan) has been attached as appendix 3 while a more detailed Occupational Health and Safety Management (OHSM) training for the entire AGROW project have been proposed in the Environmental and Social Management Framework (ESMF).
- There shall be no use of child labour or forced labour, depending on the work area, minimum age of employment shall be 18 years.
- Workplaces shall be free of Sexual Harassment (SH), Sexual Exploitation and Abuse (SEA), Gender-Based Violence (GBV).
- Grievance Redress Mechanism for workers shall be instituted at all levels of engagement in consultation with the affected worker category.
- Workers shall have their right of association and collective bargaining.
- There shall be proper documentation of contractors/suppliers management in line with OHS requirements.
- Termination of appointment shall be valid or reasonable, clear and unambiguous, without prejudice and employee must be aware of the reason.
- There shall be continuous consultation with workers on the effectiveness and improvement of the labour management procedures.

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5.3 Procedures

These Procedures shall stay consistent once they're established to maintain a general understanding of what employees should do in various circumstances. “Contractors shall operate an **OHSMS** aligned with **WBG EHS Guidelines** practices and **ISO 45001**, including structured hazard identification, risk assessment, controls hierarchy, PPE, emergency planning, incident investigation (root-cause & CAP), worker participation, and continual improvement

1. Non-discrimination and equal opportunity

Employment of AGROW project workers will be based on the principles of non-discrimination and equal opportunity. There will be no discrimination with respect to any aspects of the employment relationship, including recruitment, compensation, working conditions and terms of employment, access to training, promotion or termination of employment.

The following measures will be followed by the FPCU/SPCU and contractors and monitored by the respective E&S team of the SPCU:

- Recruitment procedures will be transparent, public and non-discriminatory, and open with respect to ethnicity, religion, sexuality, disability or gender;
- Clear job descriptions will be provided in advance of recruitment and will explain the skills required for each post;
- All workers will have written contracts describing the terms and conditions of work and will have the contents explained to them. Workers will sign the employment contract;
- Depending on the origin of the employer and employee, employment terms and conditions will be communicated in a language that is understandable to both parties;
- In addition to written documentation, an oral explanation of conditions and terms of employment will be provided to workers who may have difficulty understanding the documentation.
- Government workers deployed to work in FPCU/SPCU will be given official deployment letters from their parent ministries which will state the designation at the PMU, reporting obligations, commencement date and end date (where possible), entitlements amongst others.

2. Age of Employment

Sub-projects of AGROW will only engage individuals at minimum age of eighteen (18) as stated in the Child Act (2003), where it does not affect the worker’s ability to attend school and this will be enforced at recruitment and monitored by the PMUs for suppliers and contractors.

- Contractors will verify the identity and age of all workers. This will require workers to provide official documentation, which could include a birth certificate, national identification card, passport, or medical or school record.
- Hired project workers above 18 will conduct their activities in ways that are not detrimental with respect to education or be harmful to the child’s health or physical, mental, spiritual, moral or social development.
- If a child under the minimum age is discovered working on the project, measures will be taken to immediately terminate the employment or engagement of the child in a responsible manner, considering the best interest of the child.

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3. Terms and Conditions of Employment

- All workers will be provided with clearly defined terms and conditions of employment
- Consultants will apply the terms and conditions stipulated in their contract of engagement.
- The conditions of employment will set out workers' rights under national labour and employment law (which will include any applicable collective agreements), including job title, supervisor, their rights related to hours of work, wages, overtime, compensation and benefits, contract duration, disciplinary procedures, rules & regulations, procedure for termination of appointment, as well as those arising from the requirements of this LMP. This information and documentation will be provided at the beginning of the working relationship and when any material changes to the terms or conditions of employment occur. Oral communication and explanation of working conditions and terms of employment will be provided where project workers do not read or have difficulties understanding the documentation.
- Project workers will be paid on a regular basis as required by national law and in the conditions of employment. Deductions from payment of wages will only be made as allowed by national law or the labour management procedures, and project workers will be informed of the conditions under which such deductions will be made.

4. Working conditions

- AGROW Project workers will be provided with facilities appropriate to the circumstances of their work, including access to canteens, hygiene facilities, and appropriate areas for rest.
- Where workers camps are provided to project workers, policies will be put in place and implemented on the management and quality of accommodation to protect and promote the health, safety, and well-being of the project workers, and to provide access to or provision of services that accommodate their physical, social and cultural needs in line with the provisions of ESS 2.
- Provide protection and assistance for pregnant women against prejudice, physical harm, and unfair dismissal and allow for adequate maternity leave in line with applicable laws.
- Ensure workplace ergonomics including adequate lighting to avoid eyestrain including protective screens on computers, position computer workstation at a parallel position to the eyes, use of supportive chairs for good lumbar support. good housekeeping practices. proper layout of electrical wires and appliances, provision of fire extinguishers.

5. Workers' Privacy

The AGROW project shall comply with international standards aimed at safeguarding workers' right to privacy. Any personal information that AGROW project gathers about its workers shall be used for the intended purposes which the worker must be aware of. Personal information about a worker must be collected directly from the worker unless he/she consents, in writing, to the third-party release of personal information. Where workers are being monitored including the use of CCTV cameras, the AGROW project shall ensure that such practices do not violate workers' right to privacy. Hence, regardless of how the SPCU decides to monitor its workers, its monitoring practices must be reasonable, proportional and justifiable to the project needs served.

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(i) Staff Insurance and Other Matters

All AGROW project staff are encouraged to take pension, Group Personnel Life and Accident Insurance Scheme. The AGROW project may facilitate these schemes for the benefit of staff on a voluntary, equitable and contributory basis. There shall not be any financial obligation on AGROW project. Payment for Insurance therefore is not an eligible expenditure under the IDA. Therefore, Government Contribution can be used for health and Group Insurance for AGROW project staff but this is subject to the approval of Supervisory ministry/Agency/Body.

(ii) Annual Leave

It is the responsibility of the Administrative Officer of the AGROW project to compile an annual leave roster in collaboration with the Heads of Departments and the approval of the National Coordinator at the beginning of the year. An annual leave can be taken in two instalments. Any leave not taken within the calendar year shall be deemed forfeited unless there is express approval of the National Coordinator.

(iii) Casual Leave

A maximum of seven days casual leave may be granted to a staff based on the recommendation of the Head of Department or National Coordinator. Staff can only enjoy casual leave after exhausting his/her annual leave for the year. Casual leave in excess of seven days shall be monetized and deducted from the staff's benefits.

(iv) Sick Leave

A sick leave on full pay may be granted by the AGROW project subject to a maximum of three months on the production of a medical certificate signed by a government Medical Officer or medical practitioner approved by government. The AGROW project may extend the sick leave for additional period of three months. Thereafter, if the employee is still unfit to resumed duty such employee may be invalidated.

(v) Maternity Leave

All female staff who are pregnant or those who have adopted an infant through legal means with proper documentations shall be entitled to 18 weeks maternity leave with full pay. The annual leave for that year shall be regarded as part of the maternity leave.

(vi) Public Holidays

There shall be public holiday for all staff as approved by the Government and this shall be properly communicated by the administrative Officer.

6. Occupational Health and Safety

Contractors and suppliers will implement the following procedures:

- Conduct hazard and risk assessment for all job types/activities.
- Provide preventive and protective measures for such risks, including modification, substitution, or elimination of hazardous conditions or substances.
- Provide adequate work tools, first aid boxes, appropriate Personnel Protective Equipment (PPEs) and implement job controls such as work permits and Standard Operating Procedures (SOPs).
- Provide HSE/OHS training for workers and maintain records of such training, (Sample HSE training plan attached as annex 3).

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- Ensure the inclusion of EHS guidelines in contract documents and make them obligatory/mandatory. In consonance with the provisions of the ESMF, selected contractors shall be required to develop and implement an Occupational Health, Safety and Security plans that contributes to a healthy workforce and local community for the subproject.
- Document and report occupational accidents, diseases and incidents to the relevant authority in line with the project structure, implement correction, investigate the root cause, develop and implement corrective action plan (CAP). Fatalities should be reported to FPCU/SPCU, and to the World Bank within 48 hours or as soon as the root cause investigation has been carried out and draft CAP prepared.
- Prepare emergency prevention and preparedness and response plan, assign responsibilities, train responsible parties, test and improve on such plans.
- Establish Environmental, Social, Health and Safety System (ESHSS) and ensure training for associated workers in line with the required national labour requirements, World Bank ESS2 requirements and procedures set out in this LMP.
- Include women representative on OHS team to help design policies and practices responding to the needs of female project workers.
- Provide mechanism for consultation and participation of workers in OHS matters and implementation of OHS measures.
- Provide training to all employee at the beginning on their engagements and periodically on OHS covering aspects such as use of chemicals, use of PPEs, traffic safety, fire incidents etc. (HSE training plan is attached as appendix 3).
- Project workers have the right to report work situations that they believe are not safe or healthy, and to remove themselves from a work situation which they have reasonable justification to believe presents an imminent and serious danger to their life or health.

7. **Forced Labour**

- Workers will be allowed to freely and informed consent to the type of job they are being engaged to perform.
- Where forced labour is discovered in the project's workforce, prompt action will be taken to address the practice that has coerced the worker and reported to the FPCU to be addressed in accordance with the requirements of ESS 2 and national law.

8. **Sexual Harassment (SH), Sexual Exploitation and Abuse (SEA), Gender-Based Violence (GBV)**

- All categories of workers in AGROW will be made aware of zero tolerance in matters relating to SEA/SH/GBV.
- All contractors will sign code of conduct forms that prevent GBV including SEA and SH.
- Contractors will establish and inform workers of a reporting mechanism for such incidents, including referral services.
- Implement GBV action plan prepared for the project, including management of suppliers.

9. **Grievance Redress Mechanism (GRM)**

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A workplace Grievance Redress Mechanism will be provided for all categories of workers to raise workplace concerns. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use.

Project level GRM shall also be established and managed by the SPCUs to give room to Project Affected People to air their views and concerns regarding the project. In line with ESF streamlining, the project level GM will leverage the Nigeria Service Compact with all Nigerians (SERVICOM) system as the apex system for grievance redress under the project. Measures will be put in place to make the grievance mechanism easily accessible to all project workers. The GRM will be in line with the procedures set out in this LMP. The funding required for the Project Level GRM shall be part of the Project Management cost which have been duly captured in the ESMF and SEP.

10. Right of Association and Collective Bargaining

- Workers will be allowed rights to form and to join workers organizations of their choosing and to bargain collectively without interference.
- Employees will also be provided with information needed for meaningful negotiation in a timely manner.
- Contractors will not discriminate or retaliate against project workers who participate, or seek to participate, in such workers organizations and collective bargaining.

11. Contractors Management

- SPCUs will ensure that contracted workers (contractors, subcontractors, brokers, agents or intermediaries) are legitimate and reliable entities.
- Have documentation of their business licenses, registrations, permits and approvals.
- Should have safety and health personnel review their qualifications and certifications.
- Records of safety and health violations, and responses, accident and fatality records and notifications to authorities.
- Records of legally required worker benefits and proof of workers' enrolment in relevant programs, worker payroll records, including hours worked and pay received.
- Contractors to prepare Labour Management Plans as part of their ESMPs based on the provisions of this LMP and the details of labour to be used in those contracts. These plans will be reviewed and cleared by the PMU, as appropriate.
- Contracted workers will have access to a grievance mechanism as provided in this LMP.

12. Primary Suppliers

- SPCUs will track suppliers performance to help inform whether procedures and mitigation measures are being appropriately implemented and provide feedback on performance and any new areas of risk.
- Specific requirements on child labour, forced labour and work safety issues will be included in all purchasing orders and contracts with suppliers.
- Where there is a significant risk of child labour, forced labour, serious safety issues related to primary supply workers, the PMU will require the relevant primary supplier to introduce procedures and mitigation measures to address such issues. Such procedures and mitigation measures will be reviewed periodically to ascertain their effectiveness.

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13. Discipline and Termination of Employment

Project workers will receive written notice of termination of employment and details of severance payments in a timely manner: one month for skilled labour, one week for unskilled labour. However, in cases of gross misconduct, termination can be immediate but must be accompanied with proper incident report, fair, without prejudice and ensure adequate documentation.

CHAPTER SIX: ROLES AND RESPONSIBILITIES FOR MANAGING THE LMP

6.1 Introduction

The AGROW project's FPCU and the SPIUs at the State level have the overall responsibility to oversee all aspects of the implementation of this LMP including contractor's compliance across AGROW project activities. The SPIUs of participating states will address all LMP aspects as part of procurement for works/services as well as during contractor induction/training. This role

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will primarily be part of the responsibilities of the Environmental Officers, Social Safeguard officers and the GBV specialist in the SPIU, who will be required to liaise with their management on the fulfilment of such duties. Contractors will be responsible for the implementation of the plan on a daily basis and providing the required human, financial and training resources for effective compliance.

6.2 Roles and Responsibilities

Specific roles are outlined in table 5 below

Table 5: Roles and Responsibility Matrix

INSTITUTION	ACTION PARTY	RESPONSIBILITY
AGROW/ FPCU	Environmental officer, social safeguard officer and GBV specialist.	i. Oversee the corresponding officers in all participating states to ensure that contractors are made to prepare appropriate LMP and implement accordingly. ii. Conduct scheduled supervision across states to ensure compliance with appropriate plans.
SPIU of participating states	Environmental officer, social safeguard officer and GBV specialist.	i. Ensure the contractors prepare LMP for their projects and implement accordingly. ii. Carry out site inspection during project implementation to ensure that the LMPs prepared are implemented.
Contractors	HSE Officers	i. Provide workers with safety materials as well as training on safety procedures ii. Implement mitigation measures and procedures outlined in this LMP iii. Keep OHS records.
Trade Unions: Workers associations	Leadership of the Unions.	i. Manage workers welfare ii. Promote workers health and safety iii. Provide a fair system of grievance redress
Federal Ministry of Labour and Productivity	Relevant Departments	Overall responsibility for enforcing labour laws.

6.3 Capacity Assessment for Implementing the LMP

This section outlines the capacity assessment of SPCUs, as well as the MDAs responsible for AGROW implementation in terms of policies, procedures, roles and responsibilities. Strengthening actions to ensure effective implementation of this LMP are therefore suggested in table 6 below.

Table 6: Capacity Assessment for Implementing the LMP

Aspect	Capacity Assessment	Strengthening Actions
Policies	There are robust policies governing workers management, safety and wellbeing, however, provisions for freedom of association, grievance redress mechanism, gender-based violence, forced labour etc. especially for casual workers is not adequate in the Nigerian Law. ESS 2 however makes provisions for all categories of workers.	The LMP has provided a set of straightforward mitigation measures to be adopted for AGROW in addition to applicable laws and the provisions of ESS2. The provisions of this LMP should be disseminated for adoption to all participating states under AGROW. The requirement for LMP should be included in procurement contracts.
Procedures	Most contractors do not have defined procedures	Procedures have been outlined in this LMP

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	for managing labour and working conditions including procedures for grievance redress mechanism, gender-based violence, workers consultation & participation, etc., as required by ESS2.	which will guide the implementation of mitigation measures for risks associated with labour and working conditions under AGROW.
Roles	Some contractors do not engage HSE officers while some do. officers who do not have basic understanding therefore become limited in capacity to implement provisions of ESS2 and thus this LMP.	Contracts should ensure they employ competent HSE officers, enhance the capacity of the HSE teams prior to start of work in relevant areas such as OHS risk management, ESMP implementation and also coverage of social issues such as SEA/SH/GBV, vulnerable persons etc.
Responsibilities	The responsibilities of various parties in implementing and monitoring matters relating to labour and working conditions have been highlighted in this LMP.	The project team will implement capacity building programs to strengthen understanding of responsibilities, especially with respect to ESS2 and the provisions of this LMP.

CHAPTER SEVEN: GRIEVANCE MECHANISM

7.1 Introduction

A Grievance Mechanism (GM) is necessary to prevent and address project issues in the areas of implementation in a timely manner, in order to reduce exposure to risks and also provide the platform for the optimization of environmental and social benefits of the project. The grievance procedures consist of the steps that ensure proper documentation of all grievances, a discussion mechanism for hearing and resolving the grievances, and provisions for appeals in the event of dissatisfaction by any affected persons.

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7.2 Overview of GM in a Project

Internal GM for contractor workers is not the same as the project-level GM which sets out procedures for resolving project related grievances between project communities and contractors as a result of project activities. The former sets out specific procedures for workers management (labour and working conditions), while the latter sets out procedures for reporting issues related to the implementation of the project.

The issues considered may include: the project's benefit(s) to the stakeholders; potential changes to the routine activities of the stakeholders that might occur due to the project; and the project activities that might cause damage or conflict for the stakeholders. Any issues that may lead to grievances will be addressed through documented grievance mechanism that takes into consideration the cultural and traditional rights of people avoiding as much as possible potential for legal redress mechanism.

The specific objective of the mechanism is to facilitate the process and ensure effective and timely grievance resolution thereby reducing the risk of escalation of conflicts and avoiding unnecessary delays. The grievances and remedial actions shall be carefully documented to enhance accountability and reduce liability.

Aside from the traditional structure, the proposed GM will also help to achieve the following:

- To serve as the open channel for effective communication together with the identification of emerging environmental and social concerns due to the project;
- To prevent and mitigate any adverse environmental and social impacts as a result of any phase of the project.
- Promote harmonious relationships and respect in the workplace; and,
- Ensure safe working environment.
- To ensure timely resolution of complaints

This procedure according to the provisions of ESS2 requires every employer, including contractors, to have a formal grievance procedure which should be known and explained to the employees. The FPCU/SPCU staff and consultants will be informed of the applicable grievance procedure to adopt in their contracts or terms of employment. All the contractors who will be engaged for the projects under AGROW will be required to produce their grievance procedure in line with the GRM provided in this LMP as a requirement for tender.

All grievance mechanisms should at a minimum comply with these requirements:

- Reporting line of all employees;
- Specify time frame for addressing all reported grievances at each level;
- Give opportunity to report to a higher-level authority if grievance is not resolved within the stipulated time;
- Give right to seek judicial redress if unsatisfied with internal GRM

The grievance process should be guided by the following principles:

- Transparency
- Confidentiality

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- Accessibility
- Non-retribution
- Right to representation
- Proper documentation

7.3 Establishing a GM

AGROW recognizes that various categories of workers may be deployed to work on project activities and as such a uniform grievance process will be beneficial. This is described in line with the required grievance redress committees (GRC) in table 7 below. In line with ESF streamlining, the project level GM will leverage the Nigeria Service Compact with all Nigerians (SERVICOM) system as the apex system for grievance redress under the project. This procedure will guide the preparation of site specific GM to be prepared as part of the Environmental and Social Management Plans (ESMPs) for all project activities.

Table 7: Grievance Redress Procedures

First Level GM (project level GRM)	The Project will maintain a Workers' Grievance Mechanism (WGM) , distinct from the community GM. The WGM offers anonymous/confidential channels (hotline/SMS/email/box), protects complainants from retaliation, and targets resolution within 10 working days (contractor) and 15 working days (SPCU). Serious cases (SEA/SH, security) will follow survivor-centred protocols and immediate escalation. The WGM will be integrated into the national SERVICOM e-GRM hub when operational. The GRC will be formed at the contractor level and be easily accessible to project workers. The GRC will comprise of Social and environment Safeguard officer of the contractor, Contractor, and supervising consultant. The complainant shall make official complaint to the GRC through the contractor social safeguard officer. Complaints shall be duly received, registered and reviewed by the committee. If the complainant does not accept the solution offered by the first level GRC, then the complaint is referred to the 2nd level GRC.
Second Level of GM: GRC at the Project level	The second level of the GRC will be at the project level. This committee shall be comprised of the Project coordinator (chairman), social and environment officer at the SPIU, and the monitoring and evaluation officer. Only grievances that are not resolved by the first level GRM will be referred to the second level GRM. SERVICOM will serve as the apex system for grievance redress by designing an e-GM system customised for the project. Complaints shall be duly received, registered and reviewed by the committee. If the complainant does not accept the solution offered by the first level GRC, then the complaint is referred to the court redress of grievances.
	While the purpose of GRM put in place for workers is to

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Court Redress of Grievances	resolve all issues of labour and working conditions under AGROW out of court and to save time which is usually involved in litigation matters, it is not out of place to anticipate a scenario where aggrieved person is not satisfied with the process and judgment given by the grievance redress committee(s). Therefore, the project shall inform aggrieved persons of their right to seek for redress in the court of law as the final resort.
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Kindly note that this is a generic procedure, the SPCUs may need to adapt their GM to ensure the requirements of the World Bank ESS2 do not contravene with the national laws.

7.4 Roles of the GRC

The Grievance Redress Committees will be responsible for:

- Communicating with the affected worker and the contractor;
- Evaluate grievances received;
- Making the established grievance redress procedure public;
- Escalating unresolved matters to the next level GRC; and
- Maintain proper documentation of complaints, proceedings and resolutions.

7.5 Expectation when Grievances Arise

When workers present a grievance, any of the followings is/are expected from the project management/channel of grievance resolution:

- Acknowledgement of the receipt of their grievances;
- Timely and honest response to questions/issues brought raised;
- An apology, adequate compensation if recommended by the GRC;
- Modification of the conduct that caused the grievance and some other fair remedies.

7.6 Typical Grievance Redress Process

- The process of grievance redress will start with registration of the grievance(s) to be addressed by the GRC secretary, for reference purposes and to enable progress updates of the cases. Thus, the aggrieved worker will file a complaint/ complete a grievance form with the Grievance Redress Committee.
- The complaint shall contain records of the person responsible for an individual complaint, and dates when the complaint was reported; date the Grievance Log was uploaded onto the project database; date information on proposed corrective action sent to complainant (if appropriate), the date the complaint was closed out and the date response was sent to complainant.
- The officer receiving the complaint (Secretary of the GRC) will ensure that each complaint has an individual reference number and is appropriately tracked, and recorded actions are completed.

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- The response time will depend on the issue to be addressed but it should be addressed with efficiency.
- The Grievance Committee will act on it within 10 working days of receipt of grievances. If no amicable solution is reached, or the affected person does not receive a response within 15 working days, the affected person can appeal to the SPCU, which should act on the grievance within 15 working days of its filing. These timelines are further illustrated in table 8 below:

Table 8: Typical Steps in a Grievance Redress Process

Steps	Process	Description	Completion Time frame	Responsible Agency/Person
1	Receipt of complaint	Document date of receipt, name of complainant, location, nature of complaint, inform the GRC.	1-day	GRC Secretary
2	Acknowledgement of grievance	By letter, email, phone (text)	1-2 days	GRC Secretary
3	Screen and establish the merit of the grievance	Visit the site, listen to the complainant, and assess the merit of the complaint.	5-10days	GRC & the aggrieved worker or his/her representative
4	Implement and monitor a redress action	Where a complaint is justified, carry out actions recommended by GRC	14 days or at a time specified in writing to the aggrieved worker	Contractor
5	Extra intervention for a dissatisfied complainant.	Review the redress steps and conclusions, provide intervention solution	10 days of receiving status report	2nd/ level GRC
6	Judicial adjudication	Take complaint to court of law.	No fixed time	Complainant
7	Funding of grievance process	GRC logistics and training, redress compensation, court process	No fixed time	Complainant

**All complaints including anonymous ones must be attended to and resolved.*

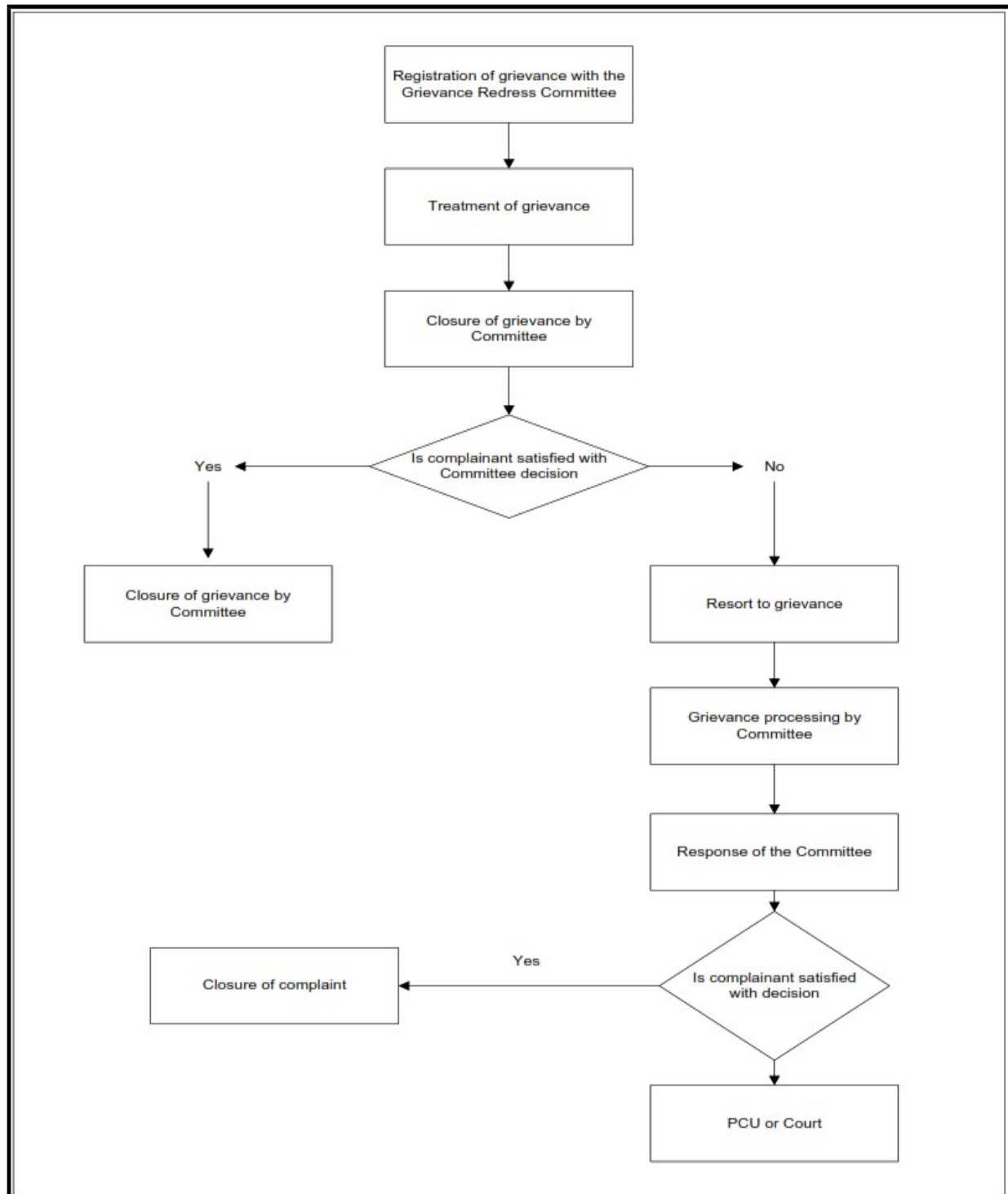


Figure 1: Grievance Mechanism flowchart

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7.7 How to Register a Complaint

There shall be a variety of channels to submit complaints:

- The complaints are submitted to the GRC secretary whom they have easy access.
- The complainants can put their grievances into the complaints boxes, which will be checked every two days by the grievance redress officer.
- The GRC will acknowledge the receipt of complaints.
- Received complaints should be registered in a grievance logbook.
- GRC will inform the complainant about the timeframe in which a response can be expected.
- GRC will investigate the grievance, consult with the aggrieved worker and resolve the issue.

7.8 Role of Trade Unions in GM

Where a trade union is recognized, it is entitled to negotiate regularly with the employer over terms and conditions existing at the workplace and the employer is obliged to negotiate with it.

The procedures followed in such instances is usually contained in the Recognition Agreement, which state how the issues are raised, the procedure for negotiations, the composition of the parties involved in the negotiation and the procedure to deal issues that are not resolved through consensus. If the dispute is not resolved at the workplace, the parties to the dispute can utilize the dispute resolutions mechanisms provided for section 7.6 above.

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CHAPTER EIGHT: MONITORING CONTRACTORS

8.1 Contractors' Monitoring

Selection of contractors shall be made according to the World Bank procurement procedures and occupational health and safety as provided in the World Bank Standard Procurement Documents and Nigerian laws. The AGROW project, after receiving bids from the contractors shall ensure that the contractors are legitimate and have permits according to the Nigeria law, and the necessary professional bodies. The Environmental and Social Management Framework (ESMF) and this LMP form an integral part of the bidding documents to be issued to contractors and shall form part of the awarded contracts to these contractors.

In addition, proper training and orientation shall be given by the AGROW project's Environmental and Social safeguards specialists on different stages of awarding and implementation to contractors, to ensure full understanding and compliance. The project will maintain numerous business stakeholders such as contractors, and other third-party suppliers, it is advisable to inform the contractors and other third suppliers about their commitment and obligation to ensuring worker welfare and safety which must be included in clauses in 10 of the ESS2 contractual agreement.

The AGROW project will manage and monitor the performance of contractors in relation to contracted workers, focusing on compliance by contractors with their contractual agreements (obligations, representations, and warranties) and labour management procedures. This may include periodic audits, inspections, and/or spot checks of project locations as well as of labour management records and reports compiled by contractors.

This may include periodic audits, inspections, and/or spot checks of project locations and work sites as well as of labour management records and reports compiled by contractors. Contractors' labour management records and reports that may be reviewed would include: representative samples of employment contracts or arrangements between third parties and contracted workers, records relating to grievances received and their resolution, reports relating to safety inspections, including fatalities and incidents and implementation of corrective actions, records relating to incidents of non-compliance with national law, and records of training provided for contracted workers to explain occupational health and safety risks and preventive measures.

8.2 Verification, Monitoring Mechanism and Reporting

In realization of the project objectives for AGROW, several layers of monitoring systems will be instituted as part of Labour Management Plan. These will include the following:

- Employee's grievance register (where applicable)
- Nominal roll and class of employment
- Workers benefits in relation to contract between contractors and workers

Accident and Incident Recording

- Reporting and Investigation System

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- The number and type of all accidents and incidents including near misses occurring during the construction phase shall be recorded including the corrective actions required to address them. In addition, the system should identify roles and responsibilities for recording, reporting and investigating incidents and for corrective action planning.
- Community Feedback
- Complaints and Grievance System
- Community complaints and concerns will be captured and addressed through the main Grievance Redress Mechanism (refer to Stakeholder Engagement Plan).

8.3 Human Resources Employee Database

SPCUs of participating states shall keep a database of all workers employed under the AGROW project. The database will record information on the personal details of employees (such as home address, next-of-kin/emergency contact); their job description, role and responsibilities, training records and training needs, etc.

Worker Feedback system: The worker feedback system will log all grievances, issues and concerns raised by workers during engagement sessions. The system will also record information on measures to address issues, timeframes, personnel responsible and any subsequent feedback that is required.

8.4 Contractor Database

There shall also be a comprehensive database of all primary⁶ contractor and secondary⁷ contractors for the AGROW Project. The database will record a summary of their scope of work, business origins, and a brief profile about the history of compliance with environmental and social standards.

8.5 Supply Chain Database

This will contain information of the key suppliers which will be used to monitor the primary supply chain and record results of risk assessments for incidents of child and / or forced labour and significant environmental safety issues.

⁶ The primary contractor who holds the main contract directly with the project and has full responsibility for delivering works under the contract

⁷ secondary contractor engaged only when the primary contractor cannot deliver or requires support and are not hired directly by the project

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CHAPTER NINE: STAKEHOLDERS CONSULTATION

9.1 Categories of Stakeholders'

Several stakeholders were consulted in the preparation of this Labour Management Procedure, these stakeholders include the Ministry of Labour and their State Controllers; Ministry of Agriculture and Food Security (FMAFS); Department of Fertilizer of Input Support Services (FISS); Federal Ministry of Environment (FMEnv); Federal Ministry of Women Affairs (FMWA) etc. Others are the NGOs, Labour Unions, etc. The essence of the stakeholders' consultations was to carry stakeholders along as well as collect useful information that will help in putting a comprehensive plan in place for AGROW implementation in line with the requirements of ESS 2. A separate Stakeholders Engagement Plan (SEP) has also been prepared for the AGROW project to guide continuous stakeholders' consultation through the lifetime of AGROW implementation. A list of stakeholders consulted during LMP preparation is presented in table 9 and 10 below

Table 9: Summary of Key Stakeholders Consultation at National Level

State	Name and Designation	Contact	Date	Comments
FCT	Mrs. Lafkat .A. Adetoro, Director, Federal Ministry of Environment	07032797723	20/8/25	The Director was excited for the AGROW project but however requested that infrastructural upgrade be carried out in Implementing Ministries like FMEnv to ensure effective monitoring
FCT	Mr. Burka Musa Director, Federal Department of Agriculture.	08080339368	20/8/25	The Director pledged to cooperate with all the concerned stakeholders in the GROW project, to ensure its success.
FCT	Mr. Adamu Samaila Web, Director, Gender Affairs., FMWA	08036323894	21/8/25	
FCT	Mr. Abana Waziri Abba, Fertilizer Input Support Services., FMAFS.	08091239412	22/8/25	
FCT	Falonipe Amos. Director TUSA Dept., Ministry of Labour,	08033057537	25/8/25	

Table 10: Stakeholders Engagement with Directors and Zonal Officers of the Ministry of Labour and Productivity

State	Institution/Designation	Phone Number	Date	Comments
FCT	Falonipe Amos. Director TUSA Dept., Ministry of Labour,	08033057537	29/8/25	Emphasized on the Categories of workers at construction sites and their remuneration/benefits. The company policy on casual workers was also discussed.
FCT	Clement Fatoki, Director, Operations; Min. of Labour	0805676740	29/8/25	Awareness on the upcoming AGROW project was created. Emphasizes the need to improve the infrastructure base of concerned Ministries so that they be effective in projective monitoring.
Abia	Labour Controller	0703 532 9661	29/8/25	Labor laws and Child protection laws Mandate of Min of Labours in line with world bank projects. The need for the Ministry to achieves its objectives .
Akwa Ibom	Labour Controller	09039498378	29/8/25	Stressed the need to take GBV Risks in AGROW projects seriously; and that Survivors challenges and cultural norms Service providers/ Referral pathways are mapped and defined.

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State	Institution/Designation	Phone Number	Date	Comments
Ogun State	Labour Controller	08023597033	29/8/25	Advised that Guidelines on rights of workers in Agricultural sector. This has been used in chapter 5.
Gombe	Labour Controller	0814 791 8818	29/8/25	Categories of workers at Agricultural sites and their remuneration/benefits. The Worker's policy was also discussed in the LMP report.
Ondo	Labour Controller	0803 471 8678	29/8/25	One of the fundamental problems that would be addressed by the AGROW project is the difficulty for women to access Agricultural land for cultivation. The state government will ensure that cultural inhibition are removed.
Plateau	Labour Controller	0806 957 7744	29/8/25	Advised that the AGROW project should ensure that Inputs (Fertilizer and Seeds) are included as part of the farmers benefits.
Taraba	Labour Controller	0703 497 8759	29/8/25	Tractors and farm implements should be provided at subsidized prices for hire, so that many farmer can access them.
Imo State	Labour Controller	0810 947 4218	29/8/25	Government should set up agency for procuring farmers produces so that farm losses by the farmers can be reduced.
Benue	Labour Controller, Aliyu Mahdi	0703 028 0511	29/8/25	Expressed gratitude for the intentions of government; noting that the state is the food basket of the country and the Govern should ensure that the State gets its fair share of the AGROW project.
Borno	Labour Controller, Ibrahim Abubakar	0805 968 3431	29/8/25	Emphasized the need to have Code of conducts for workers Contracts in line with the world bank standard Employment procedures in line with the ESS2
Delta	Labour Controller, Ozulumba Eucharia	0802 556 6560	29/8/25	Raised concerns on the Gender based violence Risk associated with the new AGROW project; and suggested capacity Building to sensitize the peoples on preventive measures. And good knowledge of the Referral Centres.
Edo	Labour Controller, Ononyaba Simon	0803 377 2785	29/8/25	Advised the AGROW project to ensure an effective Grievance Redress Mechanism that will capture and effectively address the concerns f Complaints.
FCT	Labour Controller, Olugbemi	0806 554 2524	29/8/25	Raised concerns of failure of farmers to receive Inputs timely for use in their farms, hence the need to overhaul the Input distribution system to ensure transparency.
Oyo	Labour Controller, Igbinosun festus	806 122 8891	29/8/25	Advised government to ensure that the entire Agricultural value chains received their attention in this AGROW project; as this will go along way to reduce post-harvest losses.
Rivers	Labour Controller, Winifred	803 551 4389	29/8/25	Government should ensure that the benefits of this project get to the real farmers and NOT the political farmers.
Gombe	Ada Daniel Taditional Community Livelihood Officer	07068203499	29/8/25	Women inclusion on developmental projects Community Expectations and proper communication GBV Risk and sensitization Preventing marginalization of vulnerable groups
Lagos	Labour Controller, Itemoagbo	0808 237 2787	29/8/25	Advised the Governor to key in this project in their respective states so that the intentions of government to make Nigeria self-sufficiency in food production through this project will be realized.
Sokoto	Alh Suleiman Dikko	08036529249	29/8/25	Labour issues in the construction sector are

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State	Institution/Designation	Phone Number	Date	Comments
	NLC Secretary			managed and regulated by the trade union arm of the NLC.

A comprehensive list of all stakeholders for the AGROW project has been compiled in the Stakeholders Engagement Plan (SEP) prepared separately for the project

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Annex

Annex 1: Terms of Reference

TERMS OF REFERENCE (TOR) FOR THE PREPARATION OF LABOR MANAGEMENT PROCEDURE FOR NIGERIA SUSTAINABLE AGRICULTURE VALUE CHAINS FOR GROWTH PROJECT

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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.

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.

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.

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

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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.

Objective of the Consultancy Services

The objective of the consultancy service is to prepare a Labor Management Procedure (LMP) for the proposed project. The Consultant shall ensure that the LMP outputs of the assignment comply with and meet the legal, laws and technical requirements of the Government of Nigeria and the World Bank. More specifically, the LMP should set out the procedures for addressing labor conditions and risks associated with the proposed project, which is aimed at helping the project to determine the resources necessary to address Project Labor issues. The LMP is expected to align with the context of the World Bank Environmental and Social Standards (ESS) 2 on Labor and Working Conditions. See Annex A.

Scope of Work for the assignment

The LMP will describe the requirements and expectations in terms of compliance, reporting, roles, supervision and training with respect to labor and working conditions, including camp accommodation where applicable. The LMP will cover all categories of workers but exclude government workers/civil servants working in connection with this project except there is a legal transfer of their employment or engagement to this project. The LMP will set out the following procedures

a. Overview of labor use on the project: This should describe the following, based on available information: number of project workers, characteristics of project workers, timing of labor requirements, contracted workers, community workers, migrant workers etc. Also, identification of all classes of possible project workers.

b. Assessment of key potential labor risks: This section should describe the following, based on available information. The key labor risks which may be associated with the project (see, for example, those identified in ESS2). These could include, for example:

- The conduct of hazardous work, such as working at heights or in confined spaces, use of heavy machinery, or use of hazardous materials
- Likely incidents of child labor or forced labor, that exposes young workers to hazardous work with reference to the agriculture sector in Nigeria.
- Likely presence of migrants or seasonal workers
- Risks of labor influx or gender-based violence

Risk of Sexual Exploitation and Abuse (SEA)

- Possible accidents or emergencies, with reference to the sector or locality
- General understanding and implementation of occupational health and safety requirements

c. Brief overview of labor legislation (Terms and conditions): This section should set out the key aspects of national labor legislation with regard to terms and conditions of work, and how national legislation applies to different categories of workers

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identified in Section (a) above. The overview focuses on legislation which relates to the items set out in ESS2, paragraph 11 (i.e. wages, deductions, rest per week, annual holiday and sick, maternity and family leave and other benefits).

d. Brief overview of labor legislation (Occupational Health and Safety): This section should set out the key aspects of the national labor legislation with regard to occupational health and safety, and how national legislation applies to the different categories of workers.

e. Responsible Staff: This section identifies the functions and/or individuals within the project responsible for (as relevant): engagement and management of project workers, engagement and management of contractors/subcontractors, Occupational Health and Safety (OHS), training of workers and addressing worker grievances

f. Policies and procedures: This section should set out information on OHS, reporting and monitoring and other general project policies. Where relevant, it identifies applicable national legislation.

g. Age of employment: This section should set out details regarding: (i) the minimum age for employment on the project (ii) the process that will be followed to verify the age of project workers (iii) the procedure that will be followed if underage workers are found working on the project (iv) the procedure for conducting risk assessments for workers aged between the minimum age and 18

h. Terms and Conditions: This section sets out details regarding:

- Specific wages, hours and other provisions that apply to the project
- Maximum number of hours that can be worked on the project
- Any collective agreements that apply to the project. When relevant, provide a list of agreements and describe key features and provisions
- Other specific terms and conditions such as forced labor, Non-discrimination and equal opportunity

i. Grievance Mechanism: This section should set out details of the grievance mechanism that will be provided for all workers identified under Section (a) above and describe the way in which these workers will be made aware of the mechanism.

j. Contractor Management: This section sets out details regarding:

- The selection process for contractors,
- The contractual provisions that will be put in place relating to contractors for the management of labor issues, including occupational health and safety,
- The procedure for managing and monitoring the performance of contractors.

k. Community Workers: Where community workers will be involved in the project, this section should set out details of the terms and conditions of work

l. Primary Supply Workers: Where a significant risk of child or forced labor or serious safety issues in relation to primary suppliers has been identified, this section should set out the procedure for monitoring and reporting on primary supply workers.

REPORTING

The Consultant will work closely with the implementation unit at the Federal Ministry of Agriculture and Food Security

DURATION OF THE ASSIGNMENT AND ESTIMATED STAFF INPUT

The duration for preparing the Labor Management Procedure (LMP) shall not exceed 4 Weeks. The Consultant shall prepare a detailed workplan for conducting the assignment after contract signing.

DELIVERABLES

The key output of the services is an LMP prepared to include detailed Labor Management Procedures based on the scope of activities under this consultancy. The following report shall be submitted to the Federal Ministry of Agriculture and Food Security for review and approval and to the World Bank as detailed below:

Inception Report - Not later than one (1) week from contract award, an Inception Report shall be submitted that presents the Consultant's Work Plan, defining the Implementation Schedule by task, as well as methodology. This will also include the table of content of the final report. Five (5) hard copies and one electronic copy shall be submitted to the Project Implementing unit of the Federal Ministry of Agriculture and Food Security.

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Draft Report - Not later than three (3) weeks from contract award, a draft report shall be submitted. This shall be circulated to the Federal Ministry of Agriculture and Food Security and the World Bank for review and comments. Issues and comments raised shall be incorporated in the draft final report. Five (5) hard copies and one electronic copy shall be submitted.

Draft Final Report – Not later than three (3) weeks after contract signing, a draft final report that addresses all comments raised at the draft stage shall be submitted. Five (5) hard copies and one electronic copy of this report shall be submitted. This version shall be consulted upon with relevant stakeholders prior to submission. The final version must contain an executive summary

Final Report– Not later than four (4) weeks from contract signing, a final report which addresses all comments raised shall be submitted in ten (10) hard copies and one electronic copy.

QUALIFICATION AND EXPERIENCE

A master's Degree in humanity, policy and administration or related field with at least 8 years' experience in development studies, experience with similar assignment in project development and implementation.

Skills, Knowledge and Competencies:

Proven experience in conducting qualitative research/analysis on issues related to labor inspection and labor administration and/or human resources policies for highly qualified staff retention

Experience in analysis of labor administration - labor inspection and/or HR policies in public offices for staff retention-motivation, standard operational proceedings, training schemes, planning, etc.

Good communication skills, partnering, conduction of workshops or events, collection of feedback, etc

Ability to write accurate and concise reports;

Excellent written and oral communication skills in English;

Familiar with World Bank ESF standards particularly ESS2;

Ability to understand the changing environment, and to anticipate developments and opportunities, threats, and weaknesses to project a clear pathway forward for the project;

CONDUCT OF THE CONSULTANT

The Consultant will, at all times, be expected to carry out the assignment with the highest degree of professionalism and integrity. The Consultant will be expected to conduct his/her duties in an open and transparent manner.

The Consultant will not, under any circumstance, take any actions or be seen to be taking any actions, which may hinder or prevent the Nigeria Sustainable Agriculture Value Chains for Growth Project from executing this assignment;

The Consultant will study all documents related to the Nigeria Sustainable Agriculture Value Chains for Growth Project, guidelines and policies and will be expected to ensure that the assignment is concluded with the strictest adherence to all such policies and regulations;

The Consultant will not, under any circumstances, take any material decision pertinent to this assignment without the express permission and written consent of an authorized representative of Nigeria Sustainable Agriculture Value Chains for Growth Project; and

The Consultant will not, under any circumstances, discuss, divulge or use any information regarding this assignment or any other transaction conducted as part of the FGN's Program, without the express written permission of an authorized representative of Nigeria Sustainable Agriculture Value Chains for Growth Project.

FEES AND REIMBURSABLE

Consultant fees and reimbursable (travel costs, communication, cost of attending consultation meetings with key stakeholders e.t.c) shall be included in the proposal/ Workplan. The cost of stakeholder's engagement will be the responsibility of the Federal Project Planning Team.

The following milestone payment will be adopted:

Inception Report – 20%

Draft Report – 50%

Final Report – 30%

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Annex 2: Sample of Risk Assessment Tool

Hazard Identification	Categorize Hazards	Control Hazards	Decision Makers
What are Hazards? Danger which threatens physical harm to employees	Who or what may be harmed? Identify groups of people, materials, equipment that can be hazardous? People who may not be in the workplace all the time; Analyze the workstation, interaction with other workers	List what is already in place to reduce the likelihood of harm or make any harm less serious	Make sure risks are reduced “so far as is reasonably practicable”. An easy way of doing this is to compare what is being done with best practice. If there is a difference, list what needs to be done
Recognizable and Foreseeable Hazard Look and walk around, what do you see? Conduct wide surveys Categorize Hazards into Materials, Environment, Equipment, People and System (MEEPS) Review Documentation by checking safety instructions; Contacting your supervisors	Low-risks Moderate-risks Substantial-risks	Prioritize hierarchy of controls -Elimination -Substitution -Administrative -PPEs	Remember to prioritize. Deal with those hazards that are high-risk and have serious consequences first.
Risk Assessment Review			
Review assessment to make sure you are still improving, or at least not sliding back If there is a significant change in the worksite, remember to check your risk assessment and where necessary, amend it	Reviewer:	Review Date::	Endorsed By:
Review assessment to make sure you are still improving, or at least not sliding back If there is a significant change in the worksite, remember to check your risk assessment and where necessary, amend it	Reviewer:	Review Date::	Endorsed By:

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Annex 3: Sample of a Contractor's Code of Conduct

1.0. AIM OF THE CODE OF CONDUCT

The main aim of the Code of Conduct is to prevent and/or mitigate the social risks within the context of rehabilitation and expansion of schools. The Codes of Conduct are to be adopted by contractors. The social risks that may arise include but not limited to Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA), Violence Against Children (VAC), HIV and AIDS infection/spread, and occupational health and safety.

2.0 KEY DEFINITIONS

The following definitions apply:

Gender-Based Violence (GBV)

This is defined as any conduct, comment, gesture, or contact perpetrated by an individual (the perpetrator) on the work site or in its surroundings, or in any place that results in, or is likely to result in, physical, sexual, or psychological harm or suffering to another individual (the survivor) without his/her consent, including threats of such acts, coercion, or arbitrary deprivations of liberty.

Violence Against Children (VAC)

This may be defined as physical, sexual or psychological harm of minor children (i.e. under the age of 18), including using for profit, labour, sexual gratification, or some other personal or financial advantage. This also includes other activities such as using computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any mediums.

Child Labour

This involves employment of underage. Any person under the age of 18 should not be employed in the project sites.

Child Protection (CP)

An activity or initiative designed to protect children from any form of harm, particularly arising from VAC, and child labour.

Child

The word is used interchangeably with the term minor and, in accordance with the United Nations Glossary on Sexual Exploitation and Abuse, refers to a person under the age of 18.

Grooming

This is defined as behaviours that make it easier for a perpetrator to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child, and then seek to sexualise that relationship (for instance by encouraging romantic feelings or exposing the child to sexual concepts through pornography).

Online Grooming

This is the act of sending an electronic message with indecent content to a recipient who the sender believes to be a minor, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender.

Survivor/Survivors

This is defined as the person(s) adversely affected by GBV, VAC, and child labour. Women, men and children can be survivors of GBV, VAC, and child labour.

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Perpetrator

This is defined as the person(s) who commit(s) or threaten(s) to commit an act or acts of GBV, VAC, and child labour.

Work site

This is defined as the area in which infrastructure development works are being conducted, as part of interventions planned under the project, funded by the World Bank.

Work site surroundings

These are defined as the _Project Area of Influence which is any area, urban or rural, directly affected by the project, or located within the distance of three kilometres' radius from the work site and/or worker's camps, including all human settlements found on it.

Consent

This word is defined as the informed choice underlying an individual's free and voluntary intention, acceptance, or agreement to do something. No consent can be found when such acceptance or agreement is obtained through the use of threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. Any use of a threat to withhold a benefit, or of a promise to provide a benefit, or actual provision of that benefit (monetary and non-monetary), aimed at obtaining an individual's agreement to do something, constitutes an abuse of power; any agreement obtained in presence of an abuse of power shall be considered non-consensual. In accordance with the United Nations, the World Bank considers that consent cannot be given by children under the age of 18, even in the event that national legislation of the country into which the code of conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defence.

Contractor

This is defined as any firm, company, organisation or other institution that has been awarded a contract to conduct infrastructure development works in the context of the project and has hired managers and/or employees to conduct this work.

Manager

The word is used interchangeably with the term _supervisor' and is defined as any individual offering labour to the contractor, on or off the work site, under a formal employment contract and in exchange for a salary, with responsibility to control or direct the activities of a contractor's team, unit, division or similar, and to supervise and manage a pre-defined number of employees.

Employee

This is defined as any individual offering labour to the contractor on or off the work site, under a formal or informal employment contract or arrangement, typically but not necessarily in exchange for a salary (e.g. including unpaid interns and volunteers), with no responsibility to manage or supervise other employees.

Workers Committee

A team established by the Contractor to address GBV, VAC, child labour and other relevant issues with the work force.

3.0 CODES OF CONDUCT

"Bid documents will include **SEA/SH Action Plan**: confidential reporting and **referral pathways**, survivor-centred case management, KPI-based payments for prevention activities, and **sanctions for non-compliance** (withholdings, suspension, termination). KPIs: % workers trained, time to referral, case resolution rate.

This chapter presents three Codes of Conduct (CoC) for use:

1. Contractors Code of Conduct: Commits the contractor to addressing GBV and VAC issues;
2. Manager's Code of Conduct: Commits managers to implementing the Company Code of Conduct, as well as those signed by individuals; and,

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3. Individual Code of Conduct: Code of Conduct for each individual working on project funded projects

3.1 Contractors Code of Conduct

Contractors are obliged to create and maintain an environment which prevents social risks. They have the responsibility to communicate clearly to all those engaged on the project the behaviours which guard against any form of abuse and exploitation. In order to prevent social risks, the following core principles and minimum standards of behaviour will apply to all employees without exception:

1. GBV or VAC constitutes acts of gross misconduct and are therefore grounds for sanctions, penalties and/or termination of employment and/or contract. All forms of Social risks including grooming are unacceptable be it on the work site, the work site surroundings, or at worker's camps of those who commit GBV or VAC will be pursued.
2. Treat women, children (persons under the age of 18) and people with disability with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic, cultural beliefs/practices, or other status.
3. Do not use language or behaviour towards men, women or children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
4. Sexual activity with children/learners under 18 (including through digital media) is prohibited. Mistaken belief regarding the age of a child and consent from the child is not a defence.
5. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited.
6. Sexual interactions between contractor 's employees and communities surrounding the workplaces that are not agreed to with full consent by all parties involved in the sexual act are prohibited (see definition of consent above). This includes relationships involving the withholding, promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex.
7. Where an employee develops concerns or suspicions regarding acts of GBV or VAC by a fellow worker, whether in the same contracting firm or not, he or she must report such concerns in accordance with established Grievance Redress Mechanism (GRM) that protects the identities of victims and whistle-blowers.
8. All contractors are required to attend an induction prior to commencing work on site to ensure they are familiar with the social risks and Codes of Conduct.
9. All employees must attend a mandatory training once a month for the duration of the contract starting from the first induction prior to commencement of work to reinforce the understanding of the institutional social risks and Code of Conduct.
10. The Contractor shall ensure provision of financial resources and support compliance to occupation health and safety requirements for all workers.
11. The Contractor shall ensure that workers dress appropriately i.e. dress in a way that: -
 - Is unlikely to be viewed as offensive, revealing, or sexually provocative.
 - Does not distract, cause embarrassment or give rise to misunderstanding
 - Is absent of any political or otherwise contentious slogans?
 - Is not considered to be discriminatory and is culturally sensitive .
12. The Company shall ensure provision of financial resources and trainings to prevent spread of HIV and AIDS.
13. The company shall comply with all the applicable international and national legislations including giving terminal benefits to workers who have served for at least three months;

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14. All contractors must ensure that their employees sign an individual Code of Conduct confirming their agreement to support prevention of social risks activities.

15. The contractor should ensure equitable access to limited natural resources (e.g. water points) to avoid conflicts with local communities

16. Where possible, the contractor should ensure employment of local workforces especially where unskilled labour is required to mitigate social risks

I do hereby acknowledge that I have read the foregoing Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities. I understand that any action inconsistent with this Code of Conduct or failure to take action mandated by this Code of Conduct may result in termination of the contract.

FOR THE CONTRACTOR

Signed by:

Signature: _____

Title: _____

Date: _____

3.2 Code of Conduct for Construction Site Supervisor/Managers Code of Conduct

Site Supervisors at all levels play an important role in creating and maintaining an environment, which prevents workers misconduct. They need to support and promote the implementation of the Contractors Codes of Conduct and enforce Workers Codes of Conduct. Construction site supervisor must adhere to this Code of Conduct. This commits them to develop and support systems, which maintain a safe working environment. Construction Site Supervisor responsibilities include but are not limited to:

Where possible, ensure employment of local workforces especially where unskilled labour is required to mitigate social risks;

Ensure there is zero tolerance to child labour practices;

Promote gender inclusion at all levels;

Establish a workers committee to oversee issues of workers misconduct including GBV and VAC

Ensure compliance to occupation health and safety requirements for all workers;

Ensure that workers dress code is adhered to appropriately;

Ensure that access to construction sites is restricted to authorized persons; hoarding is provided and that there is proper signage to construction site(s);

Facilitate workers training and capacity building on social, environmental and health and safety;

Ensure that all workers are sensitized on STDs including HIV and AIDS issues, provided with condoms;

Ensure that fundamental workers rights (e.g. working hours, minimum wages, etc) are protected;

Ensure that possession of alcohol and illegal drugs and other controlled substances in the workplace and being under influence of these substances on the job and during working hours should be strictly prohibited;

Ensure compliance to all legal requirements;

Supervisors failing to comply with such provision can be in turn subject to disciplinary measures including termination of employment; and

Ultimately, failure to effectively respond to some provisions of the code of conduct may provide grounds for legal actions by authorities.

Ensure that every employee under his/her supervision has been oriented on the Code of Conduct and has signed.

I do hereby acknowledge that I have read the foregoing Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to comply to all rules of this code of conduct. I

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understand that any action inconsistent with this Code of Conduct or failure to act mandated by this Code of Conduct may result in disciplinary action.

Signed by: _____

Signature: _____

Date: _____

FOR THE EMPLOYER

Signed by: _____

Signature: _____

Date: _____

3.3 Workers Code of Conduct

I, _____, acknowledge that preventing any misconduct as stipulated in this code of conduct, including Gender Based Violence (GBV), Child Abuse/Exploitation (CAE) are important. Any activity, which constitute acts of gross misconduct are therefore grounds for sanctions, penalties or even termination of employment. All forms of misconduct are unacceptable be it on the work site, the work site surroundings, or at worker's camps. Prosecution of those who commit any such misconduct will be pursued as appropriate.

I agree that while working on this project, I will:

1. Consent to security background check;
2. Treat women, children (persons under the age of 18) and persons with disability with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, birth or other status;
3. Not use language or behaviour towards men, women or children/learners that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
4. Not participate in sexual activity with children/learners—including grooming or through digital media. Mistaken belief regarding the age of a child and consent from the child is not a defence;
5. Not exchange money, employment, goods, or services for sex, with community members including sexual favours or other forms of humiliating, degrading or exploitative behaviour;
6. Not have sexual interactions with members of the communities surrounding the work place, worker's camps and fellow workers that are not agreed to with full consent by all parties involved in the sexual act (see definition of consent above). This includes relationships involving the withholding, promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex - such sexual activity is considered —non-consensual within the scope of this Code;
7. Attend trainings related to HIV and AIDS, GBV, CAE, occupational health and any other relevant courses on safety as requested by my employer;
8. Report to the relevant committee any situation where I may have concerns or suspicions regarding acts of misconduct by a fellow worker, whether in my company or not, or any breaches of this code of conduct provided it is done in good faith;
9. With regard to children (under the age of 18):

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- Not invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger.
- Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible.

- Refrain from physical punishment or discipline of children.

- Refrain from hiring children for domestic or other labour, which is inappropriate given their age, or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.

- Comply with all relevant local legislation, including labour laws in relation to child labour.

10. Refrain from any form of theft for assets and facilities including from surrounding communities.

11. Remain in designated working area during working hours;

12. Refrain from possession of alcohol and illegal drugs and other controlled substances in the workplace and being under influence of these substances on the job and during working hours;

13. Wear mandatory PPE at all times during work;

14. Follow prescribed environmental occupation health and safety standards;

15. Channel grievances through the established grievance redress mechanism.

I understand that the onus is on me to use common sense and avoid actions or behaviours that could be construed as misconduct or breach this code of conduct.

I acknowledge that I have read and understand this Code of Conduct, and the implications have been explained with regard to sanctions on-going employment should I not comply.

Signed by:

Signature:

Date: _____

FOR THE EMPLOYER

Signed by: _____

Signature: _

Date: _____

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Annex 4: Sample Health, Safety and Environment Training Plan

S/No	Training Title	Description	Timing	Who to Deliver then Training
1.	Sensitization on the HSE Manual	To train all workers on all the provisions in the HSE Manual and the company's HSE Policy (use local language as necessary) including the right PPEs	Upon mobilization of every worker to site Refresher on a monthly basis	HSE Expert Contractor HSE Officer
2.	First Aid administration	To train selected officers (Contractor HSE Officer, Site Manager, Yard Manager, Team Leaders, Female workers representatives) on the right first aid administration for different scenarios including demonstrations.	Upon mobilization to site	Public Health Expert/ First Aid Care Giver
3.	Protocol for construction sites, staging areas, borrow pits and camp site.	To ensure all workers understand the protocol to ad opt at the construction site, staging areas, borrow pits and campsite.	Upon mobilization to site Refresher every 3 months.	Site Manager
4.	General Training on site work	Right procedures for: manual handling, electrical safety, emergency procedures, work at height, confined spaces, underground construction, cofferdams etc.	Upon mobilization to site. Refresher every 2 months.	Site Manager/ Project Manager/ Engineer/ HSE Officer
5.	Daily HSE Pep Talks	To provide daily reminder on safety precautions and Acceptable environmental and social protection including do's and don't, for all workers.	Daily	Contractor HSE Officer
6.	Community Health and Safety Training	To train all workers and project management on: • Sexual Exploitation and Abuse/ Gender Base Violence Training. • Code of Conduct Training • Sensitization on STDs/STIs • Grievance Redress Mechanism.	Upon mobilization of every worker to site Refresher every 3 months.	Social Safeguard Expert
7.	Drivers Training	To train all project drivers on safety and acceptable conduct	-Upon employment -Daily Monitoring -Monthly Refresher	FRSC Expert in daily Monitoring conjunction with project manager.

Annex 5: Workers Campsite Management Framework

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Elements for managing risks associated with the Workers Campsite under the proposed project include:

- **Location:** The Contractor shall ensure to site workers camp at a designated location approved by the SPIU. The location shall be determined during the preliminary design preparation in conjunction with the local communities/authorities with the following criteria:

Be located outside the protection zone of watercourses (100 m) and wetlands.

Be located within an acceptable distance from existing residential areas.

Not located in areas with intact vegetation.

The contractor must first obtain the necessary licenses and consents from the local authorities or from the owner of the needed area; although it is the contractor's decision, it is recommended that whenever possible the camps should be handed over to the administrative or community authorities for future use;

The contractor must submit for the prior approval of the Resident Engineer, the implantation design and other project structures and specifications related to the camps and sites that are intended to be built;

The contractor shall take all necessary measures and precautions to ensure that the execution of the works is carried out in accordance with environmental, legal and regulatory requirements, including those set out in this document; The contractor shall take all measures and precautions to avoid any disturbance in the local communities and among the users of the road, as a result of the project execution.

The contractor shall, whenever possible, apply measures to reduce or eliminate any sources of disturbances. The contractor shall follow the provisions of this document, as well as the applicable legislation and standards, during the use, operation and maintenance of the camps and sites, in particular with regard to water supply and sanitation, solid waste management, handling and storage of dangerous substances, etc.

The areas occupied by the camps and sites must be recovered at the end of the project, when the contractor is demobilized, through the replacement of previously existing conditions, unless other uses are intended

Accommodation, Hygiene and Sanitation: The Contractor will ensure that all necessary sanitary facilities shall be provided for workers expected on site: separate rooms will be provided for male and female workers, all necessary sanitary facilities complying with World Health Organization (WHO) regulations will be provided for workers including:

Separate toilets for male and female

Portable water with well-placed overhead tanks

Wash basins

Concrete and covered septic tank

On-site Social and Health Care Facilities: Provision of basic on-site social and medical facilities such as first aid, basic health care center, recreational center, food service, etc. in order to reduce pressure on community facility.

Campsite Safety and Security: Provision of 24 hours security stationed at the Campsite to ensure the security and safety of construction workforce and construction equipment. **Campsite Waste Management:** Adequate waste management of sewage and other forms of waste within the campsite. The Campsite shall be equipped with independent toilet facilities for male and female workers respectively, in order to discourage irregular waste disposal. Furthermore, standards must be instituted for personal and public hygiene a long project workers. Additionally, project workers shall be properly trained on personal hygiene.

- **Establishment of and Training on Workers on Code of Conduct:** The Supervising Engineer and Safeguards Unit shall ensure that Contractors establish a workers' Code of Conduct (CoC). The CoC will help mitigate some of the social and environmental impacts of labour influx such as risk of social conflict, Increased risk of illicit behaviour and crime, Increased burden on and competition for public service provision, Wastewater discharges, Increased demand on freshwater resources, and Inadequate waste disposal and

illegal waste disposal sites etc., will help keep workers (local/foreign) in check on the rules and regulations binding their engagement. Contractors to ensure provision of training to workforce on code of conduct and ensure strict compliance. Measures provided for in the ESMP to deter illicit behaviour and other social vices are adequately enforced.

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Training programs: Conduct and ensure key staff, including contractors, receive training regarding the likelihood, significance and management of influx-related issues such as HIV/AIDS, GBV, SEA, VAC etc.

Carry out Regular Monitoring: The SPIU shall monitor for change throughout the project cycle to ensure compliance and on mitigation effectiveness from projects/contractors. Ensure a documented monitoring program that tracks key social outcomes, changes and issues at regular intervals throughout the project lifecycle.

Annex 6: Pictures of Stakeholders Consultation

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Figure 3: LMP Team Consulting and Director EA, FMENy.



Figure 2 LMP Team Consulting with Director at FMAFS



Figure 4: Consultation with Members of Unit Heads, FMAFS



Figure 5: LMP Team consulting with the Director, Gender Unit, and Federal Min. of Women Affairs



Figure 6: LMP Team with Directors TUSA, Ministry of Labour and Productivity



Figure 7: LMP Team Consults with Unit Heads, Dept. of Farm Input Support Services (FISS)



Figure 9: LMP Team consult ATAPS & Agric Value Chain

Figure 8: LMP Team virtual consultation with Dept. of Fertilizer and Input Supply Services



Figure 10: LMP Team virtual consultation with Zonal Controllers of the Ministry of Labour

Annex 7: Attendance Register for Stakeholders Consultation

Name of MDA: Ministry of Indigenes Address: (Brown House) Indigobu
Name of Focus Group: A Group Date: 20-08-2025

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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

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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: Ministry of Agriculture Address: Area 11 Garki
Name of Focus Group: Environmental & Social Frameworks for AGRON Date: 20/08/2025

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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

21-08-2025

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FISS ATTENDANCE SHEET

22-08-2025

(AGROW).

S/N	NAME	DESIGNATION	ORGANIZATION	TEL. NO.	E-MAIL	SIGNATURE
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04	Stephen Tsado	Consultant	IC, SEP & RPF	08100153605	stephen.tsado@gmail.com	[Signature]
05	Joshua H. Samasi	AD (IFQC)	FMAFS / FISS	08065269673	Samasi.joshua@gmail.com	[Signature]
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07	ELISE WILLIAMS N.	AD (OFBAP)	FISS, FMAFS	08035975489	elise.williams@gmail.com	[Signature]
08						
09	Oke Sunday	Chief Agri Officer	FISS, FMAFS	08034303009	sunokeni@gmail.com	[Signature]
10	ISA					
11	ONYENYE BRIGHT	P/ro	FISS / FMAFS	07044655568	onyenyebright@gmail.com	[Signature]
12						
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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

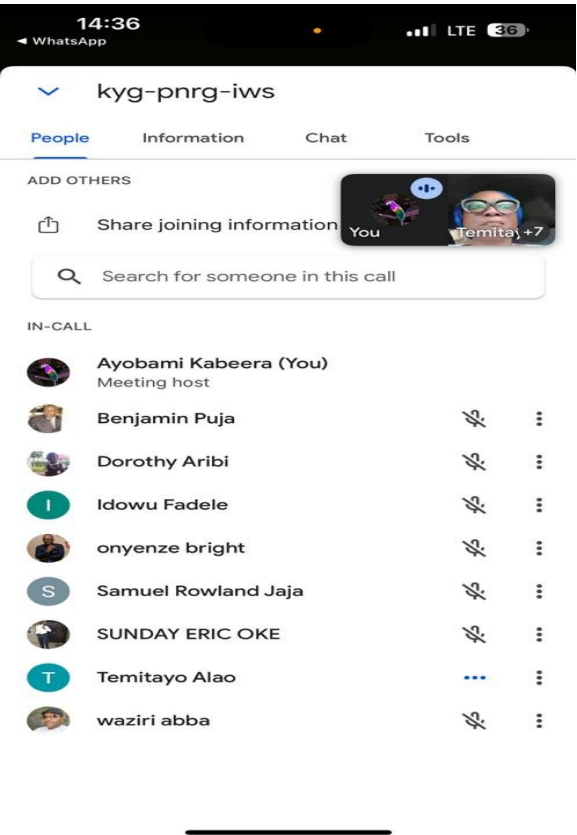
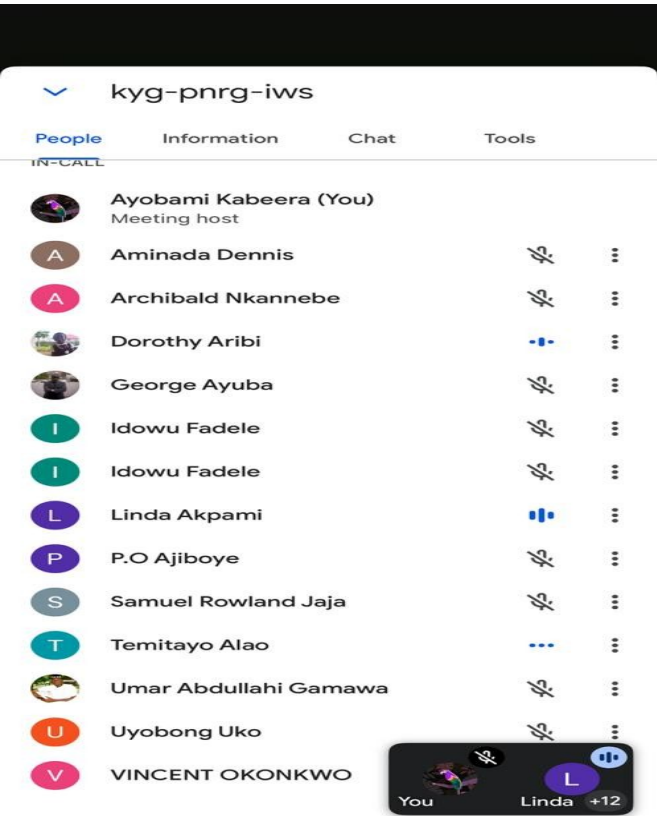
S/N	Name	Position	Phone No.	Signature
1	ABANA WAZIRI ABBA	DIRECTOR	08091239442	
2	IGOH, JANET Okunremi	D.I	0808605033	
3	UWAJE, IFEMMI. M.	AD.	0802496517	
4	Joshua H. Sanasi	AD	08065289673	
5	Oke Sunday	CAU	0803430309	
6	Sr Eze Nnamaka M	CAC	08061325092	
7	George Ayuba Mochi	CAO	08173713447	
8	ONYENZE BRIGHT	PPD	07044465558	
9	WILLIAMS KMADE	CAO	08033163205	
10	Taja Samuel Rosland	Asst. Chief Agric. Off.	08038159373	
11	EUBE WILLIAMS N.	AD	08035971589	
12	Ogunsawe David	Geo-Solution Provider Hotel	08028780889	
13	Akani Abubakar. K	Consultant	080	
14	Mrs Pemtayo Abo	South West Coordinator		
15	Mrs. Dorothy Aribi	N/W Zonal Director FINAP		
16	Nkonnobe Archibad	South East	08038792437	
17	Vincent Okonkwo	Consultant	08080986336	
	Kingsley Madumere			

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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: ATAPS Address: _____

Name of Focus Group: _____ Date: _____

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