

**Adolescent Girls Initiative for Learning and
Empowerment (AGILE) Project (P170664)**
**ENVIRONMENTAL and SOCIAL
COMMITMENT PLAN (ESCP)**

January 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Nigeria (the Recipient) is implementing the Ten Million Adolescent Girls Project (the Project), with the involvement of the following ministries and bodies: The Federal Ministry of Education (FME) and the States selected to participate in the Project (Participating States). The International Development Association (the Association) has agreed to provide financing for the Project.
2. The Federal Republic of Nigeria through FME and Participating States will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out summary of material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The Federal Republic of Nigeria will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Plans (ESMP), Resettlement Action Plans (RAP) and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.
4. The Federal Republic of Nigeria is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by The Federal Republic of Nigeria as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and The Federal Republic of Nigeria, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, The Federal Republic of Nigeria will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the Federal Republic of Nigeria. The Federal Republic of Nigeria will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Federal Republic of Nigeria shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of Environmental and Social documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	<p><i>Each Six (6) months throughout project implementation</i> <i>Starting December 2020</i></p>	FME and the Participating States.
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including without limitation any allegations of gender-based violence, Project-related occupational accidents or fatalities, or labor unrest. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken to address it, and include information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p><i>Promptly and no later than 48 hours after taking notice of the incident or accident.</i> <i>Report to the Association</i></p>	FME and the Participating States.
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>Contractors are required to provide monthly monitoring reports to the FME and the Participating States. The monthly reports would be submitted to the Association by the Federal Republic of Nigeria upon request.</p>	<p><i>Monthly</i></p>	FME and the Participating States.
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain throughout project implementation an organizational structure with qualified staff to support management of Environmental & Social risks in sufficient numbers including at least one Environmental Specialist and one Social Specialist in the State and Federal PIU. Maintain the organizational structure as necessary throughout Project implementation period.</p>	<p>Before Project Effectiveness By 29th May 2020</p>	FME and the Participating States.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Adopt, and implement the Environmental and Social Management Framework (ESMF) prepared for the Project, in a manner acceptable to the Association. The Recipient will prepare an ‘expanded ESMF’ within which a social assessment will be embedded. The assessment will help the Recipient understand the key social inclusion and risk issues and determine the potential impacts on different stakeholders</p>	Disclose ESMF by 31 st January 2020	FME.

<p>1.3</p>	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Develop, disclose and implement the following:</p> <p>(a) The Environmental and Social Management Framework (ESMF) acceptable to the Association. The ESMF, shall include a section on Labor Management Procedure and a social analysis that will identify key social inclusion and risk issues, and the impact on different stakeholders.</p> <p>i. Screen any proposed subproject in accordance with the ESMF prepared for the Project, and, thereafter, draft, adopt, and implement the subproject Environmental and Social Management Plan (ESMP), as required, in a manner acceptable to the Association.</p> <p>(b) Stakeholder Engagement Plan (SEP) including Grievance Redress Mechanism (GRM);</p> <p>(c) a project implementation manual with the environmental and social standards' section describing in detail:</p> <ul style="list-style-type: none"> • The role of E&S specialist in preparing the environmental and social standard's sections to be included in the ToRs, tender documents and works contracts, • The minimum environmental and social clauses to be included in the ToRs and tender documents (including codes of conduct, coordination, reporting and monitoring, and grievance redress mechanisms), • Incorporate environmental and social indicators into the monitoring and evaluation system • Completion timeframes • Occupational, Health and Safety system (including GBV action plan) <p>(e) Resettlement Policy Framework (RPF) and subsequent Resettlement Action Plans (RAPs) as needed for land acquisition</p>	<p><i>Disclose draft ESMF and RPF by 31st January 2020</i></p> <p><i>Final versions of the ESMF and RPF, SEP, including GRM instruments will be issued and disclosed before Project Appraisal ESMP(s) will be done once subproject site is known prior to launching the bidding process.</i></p> <p><i>[PIM to be adopted before Project effectiveness]</i></p> <p><i>Six months after effectiveness</i></p>	<p>ESMPs: FME and the Participating States.</p>
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the Labor Management Procedures and GBV/SEA Action Plan measures into the ESHS specifications of the procurement documents with contractors. Contractors will be evaluated based on inter alia their response to the E&S requirements. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts.</p>	<p><i>Prior to launching bidding processes</i></p> <p><i>Maintain procedures for management of contractors and subcontractors throughout Project implementation</i></p> <p><i>Six months after effectiveness</i></p>	Participating States.
1.5	<p>MANAGEMENT OF FEDERAL MINISTRY OF EDUCATION AND THE PARTICIPATING STATES.</p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the Labor Management Procedures and GBV/SEA Action Plan measures into the subsidiary agreement to be entered between the Recipient and the Participating States for the implantation of the Project.</p>	<i>Before project negotiations</i>	Recipient
10	<p>STATE-LEVEL CAPACITY BUILDING</p> <p>Conduct state-level institutional capacity assessment of implementing agencies in selected states and implement capacity building activities to close identified gaps.</p>	<i>Within the first year of project effectiveness</i>	FME and the Participating States.
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Update, adopt, and implement the Labor Management Procedure (LMP) that have been developed for the Project and included as a chapter in the ESMF.</p>	Disclose ESMF by 31 st January 2020	FME and the Participating States.
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Develop, maintain and operate a grievance mechanism for Project workers as described in the LMP and consistent with ESS2.</p>	<p><i>Prior to engaging project workers and maintained throughout Project implementation.</i></p> <p><i>Six months after effectiveness</i></p>	FME and the Participating States.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.3	<p>CAPACITY BUILDING OF PROJECT WORKERS Implement capacity building of Project Workers to increase awareness of social and environmental risks, code of conduct, mitigation measures including the association's procurement processes and ESF.</p>	<i>Before Project effectiveness and maintained throughout Project implementation.</i>	FME and the Participating States.
2.4	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES Prepare, adopt and implement occupational, health and safety (OHS) measures specified in the ESMPs.</p>	<i>Before Project effectiveness and maintained throughout Project implementation.</i>	FME and the Participating States.
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:			
3.1	<p>WASTE MANAGEMENT PLAN: Prepare, adopt, and implement a Waste Management Plan to manage the waste that may be generated from the minor civil works following the protocol of reduce, reuse and recycle. In addition, to encourage and promote energy efficiency, pollution prevention and management, the Recipient will use energy saving and efficient bulbs including biodegradable materials where applicable.</p>	<i>This will be prepared as part of the Environmental and Social Management Plan(s) to be prepared once subproject site is known prior to launching bidding process and Six months after effectiveness</i>	FME and the Participating States.
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY: Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs to be developed under action 1.3 above.</p>	<i>By commencement of civil works and maintained throughout Project implementation.</i>	FME and the Participating States.
4.2	<p>COMMUNITY HEALTH AND SAFETY: Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities, and include these measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Association. These may include, where relevant, mitigation measures to minimize/manage the risks/impacts associated with uncovered or barricaded or unfenced and/or unsigned hazardous such as excavated sites, trenches, and exposed electric cables.</p>	<i>By commencement of civil works and maintained throughout Project implementation. Six months after effectiveness</i>	FME and the Participating States.

4.3	<p>GBV AND SEA RISKS: Develop institutional codes of conduct for teachers and administrative enforcement mechanisms that, among other elements, prohibit sexual harassment, sexual contact with students, or other abuses of students/trainees/ teachers/ workers in schools</p> <p>Establish clear, safe, accessible procedures to report GBV and determine information sharing agreements on the necessary information to be communicated to project GRM.</p> <p>During implementation, identify and designate at least one focal point who can be a first point of contact for students experiencing sexual harassment. In case beneficiaries wish to escalate some complaints, the project GRM will include protocols specific to GBV complaints that would allow for confidential reporting and can connect survivors to women organizations (preferably specialized in GBV).</p>	<p><i>Before commencement of civil works and maintained throughout Project implementation.</i></p> <p><i>Six months after effectiveness</i></p>	<p>Recipient through FME and the Participating States.</p>
	<p>The Recipient shall develop, adopt and implement a GBV Action plan to assess and manage the risks of GBV and sexual exploitation and abuse (SEA) as part of the of the Project Implementation Manual. Notably the plan will include measures that will address risks related to civil works, as well as while travelling to school and when students are at school. Further, measures that will address GBV/SEA risks faced by contractors and recruited teachers, such as code of conducts and relevant training. The GBV plan will be reviewed bi-annually and updated annually by the respective project implementing entities in a manner acceptable to the Association.</p>	<p><i>GBV Action Plan, as part of the PIM, to be adopted before Project effectiveness</i></p>	<p>FME and the Participating States.</p>
<p>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT:</p>			
5.1	<p>RESETTLEMENT PLANS: The project is not planning to finance activities that will involve land acquisition, restrictions on land use, or involuntary resettlement. Nonetheless, risks remain as a result of the possibility of displaced people occupying abandoned schools that are identified for refurbishment. Prior to renovation, the recipient will prepare, adopt, and implement resettlement plans (RAPs) in accordance with ESS 5 and consistent with the requirements of the Resettlement Policy Framework (RPF) that has been prepared for the Project, and thereafter adopt and implement the respective RAPs before carrying out the associated activities, in a manner acceptable to the Association</p>	<p>Disclose RPF by 31st January 2020</p> <p>Resettlement Action plans (RAPs) <i>will be done once subproject site is known</i></p> <p><i>Six months after effectiveness</i></p>	<p>FME and the Participating States.</p>

5.2	<p>GRIEVANCE MECHANISM Prepare, adopt, maintain and operate a grievance mechanism to address resettlement related complaints, as described in the SEP.</p>	<p><i>Prior to commencement of resettlement activities</i></p>	<p>FME and the Participating States.</p>
<p>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES:</p>			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS: Prepare, adopt, and implement site specific ESMPs that include mitigation measures to minimize and manage the risks and impacts associated with natural habitats in a manner acceptable to the Bank.</p>	<p><i>Prior to construction of [structure] that may affect biodiversity.</i></p> <p><i>Environmental and Social Management Plan(s) include mitigation measures to minimize and manage the risks and impacts associated with natural habitats in a manner acceptable to the Bank will be done once subproject site is known and prior to the commencement of any civil works at such site.</i></p>	<p>FME and the Participating States.</p>
<p>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES. There are no Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the project area. Therefore, there are no mitigation measures to be undertaken under ESS7</p>			
<p>ESS 8: CULTURAL HERITAGE:</p>			
8.1	<p>CHANCE FINDS: The project will not finance activities that will affect cultural heritage however, the treatment of Physical Cultural Resources (PCR) including archaeological relics, fossils, human graves, shrines, sacred trees or groves that may be encountered will follow a Chance Finds Procedure that will be elaborated in the ESMPs</p>	<p><i>Environmental and Social Management Plan(s) including Chance Find Procedure acceptable to the Bank will be done once subproject site is known and prior to the commencement of any civil works at such site.</i></p> <p><i>Six months after effectiveness</i></p>	<p>FME and the Participating States.</p>
<p>ESS 9: FINANCIAL INTERMEDIARIES: The Project will not involve the use of financial intermediaries.</p>			
<p>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</p>			

10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Prepare, adopt, disclose, and implement the Stakeholders Engagement Plan (SEP), including GRM.</p> <p>SEP to be incorporated into the Project’s management system, adequate staffing and budget will be allocated for the implementation of the SEP.</p>	<p>Disclosed SEP, including GRM, by 31st January 2020</p> <p><i>Six months after effectiveness</i></p>	FME.
10.2	<p>PROJECT GRIEVANCE MECHANISM: Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP.</p>	<p><i>Six months after effectiveness</i></p>	FME and the Participating States.
CAPACITY SUPPORT (TRAINING)			
CS1	<p>Training of Project team on the Association procurement processes and ESF for project workers</p>	<p>By project effectiveness and in any case no later than</p> <p><i>Six months after effectiveness</i></p>	FME and the Participating States.
CS2	<p>Training on occupational health and safety for project workers</p>	<p>By project effectiveness and in any case no later than</p> <p><i>Six months after effectiveness</i></p>	FME and the Participating States. Funding from project budget