

**Nigeria COVID-19 Action Recovery and
Economic Stimulus (P174114)
ENVIRONMENTAL and SOCIAL
COMMITMENT PLAN (ESCP)**

October 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP).

1. The Federal Republic of Nigeria (the Recipient) is implementing the Investment Project Financing (IPF) Technical Assistant (TA) Component (the “Project”) of the Nigeria COVID-19 Action Recovery and Economic Stimulus Program (Nigeria CARES) with the involvement of the following Ministries/Agencies/Departments: The Federal Ministry of Finance, Budget and National Planning; and the Federal Cares Support Unit (FCSU). The International Development Association (the Association) has agreed to provide financing for the Project.
2. The Recipient will implement material measures and actions so that the Project for which this ESCP applies is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The Recipient will also comply with the provisions of any other Environmental and Social (E&S) documents required under the ESF and referred to in this ESCP, such as Labour Management Procedures (LMP), Stakeholder Engagement Plan (SEP) and the timelines specified in those E&S documents.
4. The Recipient 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 Recipient 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 Recipient, 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 Recipient or delegates 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 Recipient or delegates. The Recipient 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 Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, health, and safety impacts, labour influx, gender-based violence.

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 ESCP, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s) (the status of any complaints received).</p> <p>Include relevant environmental and social clauses including code of conduct in terms of reference in all procurements for Technical Assistance activities in a manner acceptable to the Association.</p>	<p>Each six (6) months after the Effectiveness Date.</p> <p>One month before commencement of the procurement process / issuance of bidding documents for any Project activities.</p>	FCSU
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project' workplace which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor, consultant 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>Promptly and no later than 48 hours after taking notice of the incident or accident. Report to the Task Team of the Association.</p> <p>A subsequent report would be provided within a timeframe acceptable to the Association, as requested.</p>	FCSU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain an organizational structure with qualified staff (Environmental/OHS, Social specialist, Gender / GBV specialist, GRM officer) and resources to support management of E&S as part of the FCSU in a manner that is satisfactory to the Association.</p>	<p>Prior to effectiveness. These will be maintained throughout Program implementation.</p>	FCSU
1.2	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that terms of reference for studies, capacity building, training and any outputs of any technical assistance activities carried out under the <i>Project</i>, including, but not limited to capacity building activities to support the FCSU in its project coordination role, consultancies for independent Verification Agency and technical assistance consultancies to support the three results areas are acceptable to the Association and duly incorporate and take into consideration the requirements of the ESSs.</p>	<p>Throughout Project implementation.</p>	FCSU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	MANAGEMENT TOOLS AND INSTRUMENTS Prepare, disclose and implement the following instruments in accordance with the ESSs and in a manner acceptable to the Association: Labor Management Procedure (LMP); Stakeholders Engagement Plan (SEP); and SEA/SH Action Plan.	The LMP and SEP will be prepared and disclosed prior to appraisal. SEA/SH Action Plan will be prepared, consulted upon and disclosed prior to hiring of contractors and consultants including FCSU hired consultants.	FCSU
1.4	MANAGEMENT OF CONSULTANTS Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the Labour Management Procedures.	As part of the LMP and SEP prepared and disclosed prior to appraisal.	FCSU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Adopt, and implement the Labour Management Procedures (LMP) that have been developed for the Project.	Prior to Project Implementation. To be implemented throughout Project implementation.	FCSU
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Prior to hiring project workers and maintained throughout Project implementation.	FCSU Funding from project budget.
2.3	OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES Prepare, adopt, and implement occupational, health and safety (OHS) measures.	The OHS will be prepared before engagement of all consultants and workers including Independent Verification Agency to address work related risk and maintained throughout Project implementation.	FCSU/Independent Verification Agency to address Funding from the Project budget
2.4	SH AND SEA RISKS Prepare, adopt, and implement a stand-alone SEA/SH Action Plan, to assess and manage the risks of sexual exploitation and abuse (SEA) and Sexual Harassment (SH).	Submit the SEA/SH Plan for the Association's approval before the preparation of the procurement documents. Once approved, the SEA/SH Action Plan is implemented throughout Project implementation.	FCSU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.1	<p>WASTE MANAGEMENT PLAN: Prepare, adopt, and implement a Waste Management Plan, acceptable to the Association, to manage the waste that may be generated from office management 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>	To be prepared as part of office management plan before engagement of all consultants and workers including Independent Verification Agency to address work related risk and maintained throughout Project implementation.	FCSU/ Independent Verification Agency to address
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>SH AND SEA RISKS Prepare, adopt, and implement a stand-alone SEA/SH Action Plan, to assess and manage the risks of sexual exploitation and abuse (SEA) and Sexual Harassment (SH).</p>	Submit the SEA/SH Plan for the Association’s approval before the preparation of the procurement documents. Once approved, the SEA/SH Action Plan is implemented throughout Project implementation.	FCSU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
Not relevant to this project			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
Not relevant to this project			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
Not relevant to this project			
ESS 8: CULTURAL HERITAGE			
Not relevant to this project			
ESS 9: FINANCIAL INTERMEDIARIES			
Not relevant to this project			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION An SEP for Federal CARES Support Unit (FCSU), Ministry of Budget and Planning, other Ministries, Departments and Agencies (MDAs) and the various implementation platform for each result areas will be prepared to create space for the views and opinions of these and other stakeholders. This is to ensure that their views, are taken into consideration in the development of technical assistance</p>	Prior to project appraisal.	FCSU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	program, development of peer learning platform and hiring of Independent Verification Agency.		
10.2	<p>PROJECT GRIEVANCE MECHANISM: A program level GRM for the CARES Pfor4 program will be developed and implemented to address complaints related to the TA activities and the broader CARES program.</p>	Prior to Project Implementation.	FCSU
CAPACITY SUPPORT (TRAINING)			
CS1	<ul style="list-style-type: none"> Institute scheduled Capacity building program to strengthen the capacity of technical staff of the State and Federal level Ministry of Environment on environmental management, environmental and social assessment and OHS skills and use of PPEs. Carryout capacity building at the State and Federal level on: Occupational Health and Safety including emergency prevention and preparedness and response arrangements to emergency situations; Labour management including issues on child labor; and stakeholder mapping and engagement. 	December 2020. To be implemented throughout Project implementation.	FCSU