

***Federal Ministry of Water Resource***

***NG Sustainable Urban and Rural Water Supply,  
Sanitation and Hygiene Program (P170734)***

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

***April 2021***

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Federal Republic of Nigeria (the Recipient) is implementing the Investment Project Financing (IPF) Technical Assistant (TA) Component (the “Project”) of the Nigeria Sustainable Urban and Rural Water Supply, Sanitation and Hygiene Program (SURWASH) with the involvement of the following Ministries/Agencies/Departments: The Federal Ministry of Water Resources (FMWR), the Federal Project Implementation Unit (FPIU) and the participating state Ministries Department and Agencies. The International Development Association (the Association) has agreed to provide financing for the Operation. The Operation consists of a Program-for-Results Financing component (the “Program”) and an Investment Project Financing component (the “Project”).
2. The Recipient through the FPIU formed within the FMWR and participating states shall 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 a summary of the material measures and actions, any specific documents or plans, as well as the timing for each of these, including the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, grievance management and the environmental and social assessments and instruments to be prepared or updated, disclosed, consulted, adopted and implemented under the ESCP and the ESSs, all in a manner acceptable to the Association.
3. The Recipient shall 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 Labor 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 shall be monitored and reported to the Association by the Recipient as required by the ESCP and the conditions of the Financing Agreement, and the Association shall 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 shall agree to the changes with the Association and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Association and the Recipient or delegates. The Recipient shall 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, labor influx, gender-based violence.

Summary of the Measures and Actions to Mitigate the Project’s Potential Environmental and Social Risks and Impacts		Timeframe	Responsible Entity/ Authority
<b>ESCP MONITORING AND REPORTING</b>			
<b>A</b>	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Association regular monitoring reports on the ESCP, 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 E&amp;S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s) (the status of any complaints received).</p>	Each six (6) months after the Effectiveness Date.	FPIU/SPIU
<b>B</b>	<p><b>INCIDENTS AND ACCIDENTS</b></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>Any incident or accident shall be registered immediately and will be reported to the Task Team Leader of the Association within 48 hours</p> <p>A subsequent detailed report would be provided within a timeframe acceptable to the Association, as requested.</p>	FPIU/SPIU
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain an organizational structure with qualified staff and resources to support management of E&amp;S risks as part of FPIU and SPIU in a manner that is satisfactory to the Association</p> <p>Hire external environmental and social consultants to provide support to the environmental and social officers seconded from the Federal/State Ministry</p>	Prior to Project effectiveness. Organizational structure to be maintained throughout Project implementation.	FPIU/SPIU
1.2	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that terms of reference for studies, capacity building, training, project coordination role, consultancies for Independent Verification Agency are carried out in a manner satisfactory to the Association and are consistent with the requirements of the ESSs.</p>	Prior to commencement of Procurement process and through program implementation	FPIU/SPIU

Summary of the Measures and Actions to Mitigate the Project’s Potential Environmental and Social Risks and Impacts		Timeframe	Responsible Entity/ Authority
1.3	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>Prepare, disclose and implement the following instruments in accordance with the ESSs and in a manner acceptable to the Association:</p> <ul style="list-style-type: none"> <li>i. Labor Management Procedure (LMP);</li> <li>ii. Stakeholder Engagement Plan (SEP)</li> </ul>	The LMP and SEP shall be prepared and disclosed by Appraisal and shall be applicable throughout project implementation.	FPIU/SPIU
1.4	<p><b>MANAGEMENT OF CONTRACTORS AND CONSULTANTS</b></p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&amp;S documents and Code of Conduct / SEA /SH action plans and the Labor Management Procedures / OHS requirements into the procurement documents for Consultants and contractors including the IVA. Thereafter ensure that the Contractors and consultants comply with the ESHS specifications of their respective contracts.</p>	<p>The LMP shall be prepared and disclosed by Appraisal</p> <p>Prior to signature of contracts</p> <p>Implementation of the management tools and instruments required throughout Project implementation</p>	FPIU/SPIU
1.5	<p><b>REGULAR REPORTING</b></p> <p>Submit quarterly Environmental and social performance reports to the Association on IPF implementation, and how the implementation of proposed environmental and social measures has been applied.</p>	Quarterly	FPIU/SPIU
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Adopt, and implement the Labor Management Procedures (LMP) that have been developed for the Project.</p>	By Project Appraisal. To be implemented throughout Project implementation.	<p>FPIU/SPIU</p> <p>Contractors</p> <p>Any other entity implementing IPF activities</p>
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Prior to hiring project workers and maintained throughout Project implementation	FPIU/SPIU

<b>Summary of the Measures and Actions to Mitigate the Project’s Potential Environmental and Social Risks and Impacts</b>		<b>Timeframe</b>	<b>Responsible Entity/ Authority</b>
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>Develop and implement occupational health and safety measures (OHS), including emergency preparedness and response measures, Project workers training to heighten awareness of possible risks (PPE, first aid, firefighting equipment, etc.), injuries and to mitigate impacts on local communities.</p>	The OHS measures shall be prepared before engagement of all consultants and workers including Independent Verification Agency to address work related risk and maintained throughout Project implementation.	FPIU/SPIU/Independent Verification Agency to address.  Contractors
2.4	<p><b>SH AND SEA RISKS</b></p> <p>Prepare, adopt, and implement a Code of Conduct for Sexual Exploitation and Abuse (SEA) / Sexual Harassment to mitigate the potential risk associated with SEA/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.	FPIU/SPIU
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE MANAGEMENT PLAN:</b></p> <p>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 shall use energy saving and efficient bulbs including biodegradable materials where applicable.</p>	To be prepared before engagement of all consultants and workers including Independent Verification Agency to address work related risk and maintained throughout Project implementation.	FPIU/SPIU
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	Although the project activities are not envisaged to result in the large-scale use of security personnel, the project will conduct security risk assessment that will inform the preparation of Security Management Plan, wherever relevant. Wherever security personnel is engaged in connection with Project activities, the Recipient will ensure that any security personnel engaged in the relevant activities associated with the Project have been: (i) screened to confirm that they have not engaged in past unlawful or abusive behavior, including excessive use of force; and (ii) adequately instructed and trained, on a regular basis, on the use of force and appropriate behavior and conduct.	Throughout Project implementation	FPIU/SPIU
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
Not relevant at this stage of the project			
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
Not relevant at this stage of the project			
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
Not relevant to this project			

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<b>ESS 8: CULTURAL HERITAGE</b>			
Not relevant at this stage of the project			
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
Not relevant to this project			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
<b>10.1</b>	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b> An SEP for SURWASH FPIU/ SPIU and other relevant Ministries Departments and Agencies (MDAs) and CSOs shall 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 the technical assistance program and in the process of hiring the Independent Verification Agency.	By Project Appraisal.	FPIU/SPIU
<b>10.2</b>	<b>PROJECT GRIEVANCE MECHANISM:</b> A program level GRM shall be developed and implemented to address complaint related to the IPF/TA activities and the SURWASH program. The project-level GRM shall accept grievances related to security and the use of security personnel as is required for any other complaint, and address worker and community concerns related to security personnel.	As a condition of effectiveness (or disbursement for the Project)	FPIU/SPIU
<b>CAPACITY SUPPORT (TRAINING)</b>			
<b>CS1</b>	Specify Training to be provided on: <ul style="list-style-type: none"> <li>Stakeholder mapping and engagement</li> <li>Specific aspects of environmental and social monitoring</li> <li>ESF</li> <li>Labor management including issues on child labor.</li> <li>Occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.</li> <li>Grievance Management Systems</li> <li>Environmental and Social Risk Management</li> </ul>	To be implemented throughout Project implementation	FPIU/SPIU