

**Federal Ministry of Health
NIGERIA COVID-19 PREPAREDNESS AND
RESPONSE PROJECT ADDITIONAL
FINANCING (P177076)**

**[Draft/Version]
ENVIRONMENTAL and SOCIAL
COMMITMENT PLAN (ESCP)**

August 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Nigeria (hereinafter the Recipient) shall implement the Additional Financing and the Restructuring of the NIGERIA COVID-19 Preparedness and Response Project (the Project) with the involvement of the Federal Ministry of Health (FMoH) through the National Project Coordinating Unit (NPCU) within the Nigeria Center for Disease Control (NCDC) at the federal level, and the respective State Ministry of Health (SMoH) through its Project Implementing Units (PIUs) at State level. The Parent Project, the Nigeria COVID-19 Preparedness and Response Project (P173980), is restructured to include activities that will help ensure effective COVID-19 vaccine acquisition and deployment in Nigeria and further strengthen preparedness and response activities under the project. The International Development Association (hereinafter the Bank) has agreed to provide financing for the Project.
2. The Recipient shall carry out the Project in accordance with the Environmental and Social Standards (ESSs). To this end, this Environmental and Social Commitment Plan (ESCP) sets out material measures and actions to be carried out or caused to be carried out by the Recipient, 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 Bank.
3. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Bank by the Recipient as required by the ESCP and the provisions of the Financing Agreement.
4. As agreed by the Bank 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 and/or any delegated agencies shall agree to the changes with the WB 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 World Bank and the Recipient or delegated agencies. The Recipient or delegated agencies shall promptly disclose the updated ESCP.
5. 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.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	REGULAR REPORTING: Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to, stakeholder engagement activities and grievances log.	Every six-months throughout the Project implementation.	Federal Ministry of Health (FMoH), through the National Project Coordinating Unit (NPCU) in NCDC, hereafter Federal FMoH/NCDC-NPCU
B	INCIDENTS AND ACCIDENTS: Promptly notify the Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, <i>including, inter alia, any COVID outbreak in the Project area</i> . 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 and supervising entity, as appropriate. Subsequently, as per the Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.	Submission to the Bank should take place within 48 hours and no later than 72 hours after learning of the incident or accident.	FMoH/NCDC-NPCU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE: a. Each State MOH shall establish and maintain a project implementation unit (PIU) within its State Epidemiological Unit with one additional Environmental, one Social and one Communication Officer. The current State PIU E&S staff implementing the REDISSE II Project shall support the implementation of the ESHS activities at the State level until the appointment of the additional specialists specified above. As of July 29th, 2021, only two states, Kogi and Niger, have engaged Environmental and Social Officers,	a. The 34 remaining states lagging on this activity would conclude this by October 30 th 2021	a. State MOH- PIU

1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</p> <p>The updated REDISSE II ESMF was updated for the Parent project, Additional Financing and restructured project. The updated ESMF will be disclosed by appraisal. The ESMF assessed the E&S risks and mitigation measures associated with the Parent, Additional Financing and restructured project. The updated ESMF has a section on journey management plan which addresses the issues of road accidents during the deployment of vaccines.</p> <p>a. Assess the environmental and social risks and impacts including SEA/SH risks of proposed Project activities, in accordance with the Environmental and Social Management Framework (ESMF) to be updated, disclosed, and adopted for the Project, including to ensure that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, have access to vaccines from the Project. The ESMF will be used to screen and identify the risks related to contracting and/or utilizing security forces to support e.g. provision of security to the vaccination team, construction of isolation units or other relevant activities supported under the project. In doing so, the environmental and social assessment will be guided by the principles of proportionality and GIIP, and by applicable law, in relation to engaging security forces, rules of conduct, training, equipping, and monitoring of security forces.</p>	<p>The updated REDISSE II ESMF shall be updated, disclosed, consulted, and adopted by Appraisal. Assessment shall be conducted before the carrying out of the relevant Project activities.</p>	<p>FMoH/NCDC/-PCU</p> <p>State Level MOH -PIU</p>
	<p>b. Prepare, disclose, adopt, and implement any environmental and social management plans, audits or other instruments required for the respective Project activities based on the assessment process, in accordance with the ESSs, the ESMF, the ESHGs, and other relevant Good International Industry Practice (GIIP) including relevant WHO Guidelines on COVID-19 response, in a manner acceptable to the Bank. This will be done before the carrying out of the relevant Project activities, and thereafter implemented throughout the carrying out of such activities. The relevant ESHS measures shall be incorporated into the procurement documents before launching the procurement process for the relevant Project activities and shall thereafter be complied with throughout the carrying out of such activities.</p>	<p>Throughout Project implementation</p>	

<p>c. Incorporate the relevant aspects of this ESCP, including any environmental and social management plans or other instruments, ESS2 requirements, and any other required ESHS measures, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply with the ESHS specifications of their respective contracts.</p> <p>The relevant ESHS measures shall be incorporated into the procurement documents before launching the procurement process for the relevant Project activities and shall thereafter complied with throughout the carrying out of such activities.</p>	<p>Throughout Project implementation</p>	
<p>d. Ensure all environmental and social management plans or other instruments include guidance by WHO on COVID-19. Plans/instruments shall be prepared, disclosed, consulted, and adopted before the carrying out of the relevant Project activities.</p>	<p>Throughout Project implementation</p>	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	<p>EXCLUSIONS: Exclude the following types of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> • Activities that have high probability of causing permanent and/or irreversible adverse effects to human health and/or the environment • Activities that may have significant adverse social impacts and may give rise to significant social conflict • Activities that may cause long term, permanent and/or irreversible (e.g., loss of major natural habitat) adverse impacts • Activities that may involve resettlement or land acquisition/use restriction, or adverse impacts on cultural heritage. • All the other excluded activities set out in the ESMF of the Project. 	During the assessment process conducted under action 1.2.a. above.	FMoH/NCDC/NPCU
1.4	<p>CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING</p> <p>a. The Project does not include a CERC</p>	Not applicable	Not applicable
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT: Labor Management Procedures (LMP) disclosed, adopted, and implemented consistent with ESS 2, in a manner acceptable to the Association. The LMP shall be incorporated into the updated ESMF.</p> <p>The Project shall be carried out in accordance with the applicable requirements of ESS2 including through, inter alia, implementing adequate occupational health and safety measures (including personal protective equipment, and emergency preparedness and response measures), setting out grievance mechanisms for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</p>	Throughout Project implementation.	FMoH/NCDC/-NPCU State MoH/NCDC-PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
	<p>Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, measures to carry out the purchase, storage, transportation and handling of vaccines (including, ultra-cold chain management) in a safe manner and in accordance with the ESHGs, and other relevant GIIP including relevant WHO guidelines; and adequately manage and dispose of health care wastes (including, vaccines) and other types of hazardous and non-hazardous wastes. The project will deploy a cold chain and logistics management plan that is robust enough to produce and maintain both ultra-cold temperatures (-80°C to -60°C), (-25°C to -15°C) and traditional (+2°C to +8°C) cold chain for storing and transporting the COVID-19 vaccine.</p>	Throughout Project implementation.	FMoH/NCDC-NPCU

	Update the National Health Care Waste Management Plan (NHCWMP) for the REDISSE II Project which will include Medical Waste Management procedures.		
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, measures to: minimize the potential for community exposure to communicable diseases; establish and implement appropriate quality management systems to manage the risks and the impacts that services provided and activities carried out under the Project may have on community health and safety; manage the risks of the use of security personnel; manage the risks of labor influx; and prevent and respond to sexual exploitation and abuse, and sexual harassment.	Throughout Project implementation.	MoH/NCDC/-NPCU State MoH/NCDC-PIU
4.2	<p>USE OF SECURITY PERSONNEL: The Project would support the engagement of members of the Nigeria Police Force and Nigeria Security & Civil Defense Corps as part of the vaccination team to aid in maintaining law and order at vaccination sites and providing escort services for movement of vaccines. Therefore, the following measures shall be adopted, to ensure that the engagement of security personnel are carried out in accordance with the ESSs:</p> <p>a. Assess the risks and impacts of engagement of the security personnel, as part of the assessment referred to in action 1.2 a) above, and implement measures to manage such risks and impacts, guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such security personnel;</p> <p>b. Adopt and enforce standards, protocols and codes of conduct for the selection and use of security personnel, and screen such personnel to verify that they have not engaged in past unlawful or abusive behavior, including sexual exploitation and abuse (SEA), sexual harassment (SH) or excessive use of force;</p> <p>c. Ensure that Project implementing entity enters into a memorandum of understanding (MoU), with the Nigeria Police Force and Nigeria Security & Civil Defense Corps and the relevant Security Unit, setting out the arrangements for the engagement of the security personnel under the Project, including compliance with the relevant requirements of this ESCP;</p>	<p>a) Assessment carried out in the same timeframe as action 1.2 a) above and Security Management Plan <i>[shall be adopted before deploying security personnel under the Project and thereafter implemented throughout Project implementation.</i></p> <p>b), c) and d) before deploying security personnel under the Project and thereafter throughout Project implementation.</p> <p>e) and f) as set out under actions 10.1 and 10.2 respectively.</p> <p><i>[g) within the timeframes requested by the Bank</i></p>	FMoH/NCDC/NPCU State MoH/NCDC-PIU

	<p>d. Ensure that such personnel are adequately instructed and trained, prior to deployment and on a regular basis, on the use of force and appropriate conduct (including in relation to civilian-military engagement, SEA and SH, and other relevant areas), as set out in the Project Operational Manual, updated ESMF, Security Management Plan, MoU;</p> <p>e. Ensure that the stakeholder engagement activities under the Stakeholder Engagement Plan (SEP) include a communication strategy on the involvement of security personnel under the Project.</p> <p>f. Ensure that any concerns or grievances regarding the conduct of security personnel are received, monitored, documented (taking into account the need to protect confidentiality), resolved through the Project's grievance mechanism (see action 10.2 below) and reported to the Bank no later than 60 days after being received; and</p> <p>g. Where the Bank shall require, after consultation with the Borrower: (i) promptly appoint a third party monitor consultant, with terms of reference, qualifications and experience satisfactory to the Bank, to visit and monitor the Project area where security personnel are deployed, collect relevant data and communicate with Project stakeholders and beneficiaries; (ii) require the third-party monitor consultant to prepare and submit monitoring reports, which shall be promptly made available to and discussed with the Bank; and (iii) promptly take any actions, as may be requested by the Bank upon its review of the third-party monitor consultant reports.</p>		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	Not relevant		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	Not relevant.		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	Not relevant.		
ESS 8: CULTURAL HERITAGE			

8.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.		
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Not relevant.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN: Revise, disclose, consult, adopt and implement the Stakeholder Engagement Plan (SEP) consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p>	A updated SEP will be disclosed by appraisal. The updated SEP shall be implemented throughout Project implementation.	FMoH/NCDC-NPCU
10.3	<p>GRIEVANCE MECHANISM: An accessible grievance mechanism is already established, and shall be publicized, maintained and operated to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall also receive, register, and address concerns and grievances related to the, sexual exploitation and abuse, sexual harassment in a safe and confidential manner, including through the referral of survivors to gender-based violence service providers.</p> <p>The grievance mechanism shall also receive, register, and address concerns arising from unintended health consequences after vaccination especially those resulting in serious adverse effects, and, as appropriate, requests for compensation.</p>	Throughout Project implementation.	FMoH/NCDC/-NPCU and State Level MOH -PIU
CAPACITY SUPPORT (TRAINING)			
CS1	The Project Implementation Unit and other relevant implementing support staff responsible for the Project are to receive training on the Project's ESHS plans and instruments, fair, equitable and inclusive access and allocation of Project benefits <i>including with regards to vaccines</i> , and the roles and responsibilities of different key agencies in the ESF/ESS implementation.	Within one month after project effectiveness and periodically with the addition of new Project team member.	FMoH/NCDC/-NPCU and State Level MOH -PIU