

**Agro-Climatic Resilience in Semi-Arid
Landscapes (ACReSAL)
(P175237)**

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

November 12th 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Nigeria (hereinafter the Recipient) will implement Agro-Climatic Resilience in Semi-Arid Landscapes (ACReSAL) Project (the **Project**) with the involvement of the Federal Ministry of Environment (FME) as lead, and Federal Ministry of Agriculture and Rural Development (FMARD) and Federal Ministry of Water Resources (FMW) as co-lead implementing agencies. Individual project components, sub-components and activities will be implemented through relevant departments, other ministries, states, and local governments, as appropriate, where FME, as lead implementing agency, will sign a memorandum of understanding with each participating entity. The International Development Association (hereinafter the Association) has agreed to provide financing for the Project.
2. The Recipient 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 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 Association.
3. The Recipient shall also comply with the provisions of 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), Environmental and Social Management Framework (ESMF), and subsequent Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plans (ESMPs), Biodiversity Management Plan (BMP), Resettlement Policy Framework (RPF) and the subsequent Resettlement Action Plan (RAP), Integrated Pest Management Plan (IPMP), Security Management Plan (SMP), Sexual Exploitation and Abuse / Sexual Harassment / GBV action plans and the timelines specified in these E&S documents.
4. The Recipient shall be 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 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 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 its 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, labor influx, compensation and resettlement assistance payments, sexual exploitation and Abuse / Sexual Harassment and 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, reports will present state of compliance with actions set out in the ESCP including environmental, social, health and safety (ESHS), performance of the project, implementation of the Security Management Plan. And in particular, 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>	Each six (6) months after the Effectiveness Date.	PMU at Federal level (Federal PMU will be responsible from the overall coordination and regular reporting regarding progress at federal, state, and local levels)
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 Leader of the World Bank.</p> <p>A subsequent detailed report would be provided within a timeframe acceptable to the Association, as requested.</p>	PMUs at Federal and State level (State PMUs will copy Federal PMU in their communication to the Association)
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>All contractors are required to submit monthly monitoring reports on implementation of ESMP, LMP, SMP, IPMP and GRM to the PMUs. The PMUs shall maintain a record of all such reports and would be submitted to the Association upon request.</p>	Monthly reports shall be submitted to the PMUs (federal or state level; whoever is managing the contractor), and to the Association upon request	PMUs at Federal and State level
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 E&S risks in sufficient numbers including at least one</p>	Federal level PMUs, not later than 3 months after Effectiveness, and maintain throughout project	PMUs at Federal, and State levels

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Environmental Specialist, one Social Specialist, one GRM officer, and one Gender/GBV specialist in the PMUs at the federal and state level. Maintain Security Management Officer. Maintain the organizational structure as necessary throughout Project implementation period.	implementation as necessary. State level PMUs, upon State selection and prior to disbursement.	
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Update, adopt, and implement, the Environmental and Social Impact Assessment, that will be prepared for the subprojects, as needed because of ESMF screening process, in a manner acceptable to the Association.</p>	Prior to commencement of any work and through Project implementation	PMUs at Federal and State level
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Prepare, consult upon, adopt, 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"> i. Environmental and Social Management Framework (ESMF); ii. Resettlement Policy Framework (RPF); iii. Preparation of Labor Management Procedure (LMP) iv. Stakeholder Engagement Plan (SEP) v. Preparation of Integrated Pest Management Plan (IPMP) vi. Security Management Plan (SMP). The disclosure of the SMP will be limited to only specific section of the SMP as agreed with the client. vii. Preparation of SEA /SH Action Plan <p>Each participating state is also required to prepare their state level SMP as a condition of disbursement and a state level SEP prior to commencement of project activities.</p> <p>Screen the proposed subprojects in accordance with the screening tools in the ESMF and RPF, and prepare, consult upon, adopt, disclose and implement the requirements subprojects' instruments such as, prior to commencement of project activities:</p> <ul style="list-style-type: none"> a) Environmental and Social Impact Assessment (ESIA), b) Environmental and Social Management Plan (ESMP), c) Biodiversity Action Plan (BAP), Biodiversity Management Plan (BMP), and d) Resettlement Action Plan (RAP), Abbreviated RAP. 	<p>Adopt, consult upon and disclose ESMF, RPF, LMP, SEP, and IPMP prior to Project appraisal (by Federal PMU)</p> <p>Full SMP to be ready by effectiveness and the State-level SMPs as condition of disbursements for each State.</p> <p>The SEP and SMP will be updated during implementation as needed (Federal PMU)</p> <p>State level SEP will be prepared upon selection of states and prior to commencement of project activities and SMP as a condition of disbursement. Both documents will be updated during implementation as needed (State PMUs)</p> <p>Subproject-specific instruments such as ESIA, ESMP, BAP/BMP and RAPs will be completed, consulted upon disclosed by State PMUs and approved by the Federal PMUs and the Association prior to commencement of project activities.</p>	PMUs at the federal and state level

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
		Contractors will adopt specific activities consistent with LMP approved by PMU prior to start of work.	
1.4	<p>MANAGEMENT OF CONTRACTORS AND CONSULTANTS</p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and Code of Conduct / SEA /SH action plans and the Labor Management Procedures / OHS requirements and adequate remedies into the procurement documents for and contracts of Consultants and contractors. Thereafter ensure that the Contractors, supervising engineers and consultants comply with the ESHS specifications of their respective contracts.</p>	<p>Prior to launching bidding processes.</p> <p>Supervise contractors and consultant throughout Project implementation.</p>	PMU at federal and state level.
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement labor management procedures (LMP) that have been prepared for the project. The LMP outlines the issues related to child labor, labor influx, working conditions and how to manage labor force on the Project.</p> <p>The provisions of the LMP will be adapted by contractors, the Federal and State PMUs and other relevant implementing agencies.</p>	<p>The LMP has been prepared and will be implemented throughout the project duration</p> <p>Contractors / supervising engineer will adopt specific activities consistent with the LMP approved by PMU prior to start of work including adequate remedies.</p>	PMUs at federal and state level
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Require contractors to establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. PMUs will ensure that contractors provide GRM for their workers</p>	<p>Prior to hiring project workers and maintained throughout Project implementation</p>	PMUs at federal and state level
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Ensure contractors prepare and implement OHS plan as part of the C-ESMP in line with the subproject ESMPs, LMP, ESMF and World Bank Group Environment, Health and Safety Guidelines (EHSGs). The OHS plan will be reviewed and cleared by the supervision engineers and PMUs</p>	<p>OHS plan will be prepared and adopted prior to the commencement of construction activities and shall be implemented throughout the project duration by the contractor. Implementation is monitored by the supervision engineers and PMUs</p>	PMUs at federal and state level, contractor, supervision engineer

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.4	<p>SH AND SEA RISKS</p> <p>Prepare a SEA/SH/ Action Plan, including an accountability and response framework and a Draft Code of Conduct (CoC) for Sexual Exploitation and Abuse (SEA) / Sexual Harassment to prevent and mitigate the potential risk associated with SEA/SH.</p> <p>Recruit NGO to develop GRM / Plan acceptable to the Association</p>	<p>Submit the SEA/SH Action Plan for the Association’s approval before appraisal. Once approved, the SEA/SH Action Plan and accountability and response framework is implemented throughout Project life.</p> <p>GRM to be prepared by effectiveness and the State-level GRM as condition of disbursements for each State</p>	<p>PMU Federal and state level</p> <p>PIU at Federal and State</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT:</p> <p>Prepare, adopt, and implement subproject specific Waste Management Plan (including hazardous wastes such as pesticides containers) and e-Waste Management Plan (for solar irrigation panels etc.) as described in the ESMF and subsequent sub-project ESMPs.</p>	<p>Before commencing of any work, and during preparation of site-specific C-ESMPs; implement through project implementation</p>	<p>Contractor</p>
3.2	<p>PEST MANAGEMENT</p> <p>Prepare, adopt, and implement subproject specific Pest Management Plans (PMPs), as per general guidance provided by the Project IPMP.</p> <p>Ensure that the pest management follows integrated approaches identified in the IPMP and the pesticides used are manufactured, packaged, labelled, handled, stored and disposed of, in accordance with national regulations, good international industry practices (GIIP), and World Bank Group’s ESHGs.</p>	<p>Project IPMP has been prepared; site specific PMPs will be prepared before commencement of any pesticide related work and during preparation of ESMPs; implemented throughout the Project implementation</p>	<p>PMUs at Federal and State level; contractors</p>
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>COMMUNITY HEALTH AND SAFETY:</p> <p>Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities such as communicable diseases, contamination of public water resources, security risk; and include these measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Association.</p>	<p>Prior to commencement of work and during preparation of site specific ESMPs.</p>	<p>PMU at State level</p>
4.2	<p>SECURITY RISKS:</p>	<p>Prepare upon state selection and prior</p>	<p>PMUs at State level</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>State level SRAs and SMPs will be prepared upon State Selections and prior to commencement of project activities. Revise, adopt and implement the measures provided in the State and sub-project specific SRAs and SMPs to manage security risks for the community and project workers.</p> <p>Use of Military and Security Actors</p> <p>The Borrower, acting through the Ministry of the Environment, shall take, and shall cause the federal and each Participating State’s SMP to take, the following measures related to the use of personnel to provide security for the implementation of Project activities, in a manner satisfactory to the Bank:</p> <ul style="list-style-type: none"> ▪ Create a management structure at the Federal level and in each Participating State to oversee security activities (including but not limited to security risk assessment, implementation of mitigation measures, monitoring, and revision), as set forth in the federal-level and relevant state-level Security Management Plans; ▪ Adopt and enforce standards, protocols and codes of conduct for the selection and use of both public and private security or military personnel adhering to the Voluntary Principles of Security and Human Rights, national and international standards and principles, 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; ▪ Ensure that such personnel is deployed in accordance with the relevant requirements of ESSs, the ESCP [and the relevant state-level Security Management Plan]; ▪ Ensure that such personnel is 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 Implementation Manual, ESMF and the national and relevant state-level Security Management Plans; and ▪ Ensure that the stakeholder engagement activities under the Stakeholder Engagement Plan include a communication strategy on the involvement of security personnel under 	<p>to commencement of project activities including preparation of procurement documents; implement throughout the Project implementation</p> <p>Prior to commencement of works and as a condition of disbursement.</p> <p>The SMP will be updated during implementation as needed</p>	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<p>the Project;</p> <ul style="list-style-type: none"> ▪ Ensure that any concerns or grievances regarding the conduct of such personnel are received, monitored, documented (taking into account the need to protect confidentiality), resolved through the Project’s grievance mechanism; and reported to the Bank no later than [30] days after being received; and ▪ Where the Bank shall require, after consultation with the Borrower: (i) promptly appoint a third party monitoring (TPM) Consultant, with terms of reference, qualifications and experience satisfactory to the Bank, to visit and monitor the Project area where military, paramilitary or security personnel are deployed, collect relevant data and communicate with Project stakeholders and beneficiaries; (ii) require the TPM 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 TPM Consultant’s reports. <p>Include the SMP in the bidding documents of the contractors, and ensure the contractors comply with the requirements of SMP</p>		
4.3	<p>GBV AND SEA/SH RISKS: Adopt and Implement Action Plan / Accountability and Response Framework (ARF) / Code of Conduct for Sexual Exploitation and Abuse (SEA) / Sexual Harassment to mitigate the potential risk associated with SEA/SH.</p>	<p>Include approved SEA / SH Action Plan/ARF in procurement documents / contract documents. To be implemented throughout project implementation</p>	<p>PMUs at federal and state level</p>
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>Upon identification of specific subproject site, develop site specific RAPs/ARAPs in line with the prepared RPF, consistent with this ESS and acceptable to the Association.</p> <p>Consult on, disclose and implement all RAPs/ARAPs prior to commencement of civil works in all sites under the project & complete RAP implementation audit.</p> <p>Deposit funding allocated for the RAP implementation for each impact location in designated RAP</p>	<p>Prior to commencement of any civil works</p>	<p>PMUs at State level</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<p>account.</p> <p>Submit compensation and resettlement assistance payments completion report to and for the Association’s clearance prior to commencing civil works at each impact site/location</p>		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>Assess biodiversity risks of the proposed subprojects in accordance with the screening tools provided in the ESMF, and prepare, adopt and implement site specific Biodiversity Action Plans (BAP) and Biodiversity Management Plans (BMP) accordingly as needed.</p>	<p>During the preparation of subproject specific ESAs and ESMPs. Implement the measures throughout the project implementation</p>	<p>PMUs at federal and state level.</p>
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
<p>Not relevant to this project</p>			
ESS 8: CULTURAL HERITAGE			
8.1	<p>If sites or features are identified, then a cultural heritage management plan or plans would be prepared and implemented. All construction contracts will include a “Chance Find” clause which will require contractors to stop construction in the event that cultural property sites are encountered during construction</p>	<p>Before commencement of any civil works</p>	<p>PMUs at state level</p>
ESS 9: FINANCIAL INTERMEDIARIES			
<p>Not relevant to this project</p>			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<ul style="list-style-type: none"> • Develop State specific SEPs, and • Implement and continuously update, where new stakeholders and issues are identified during project implementation 	<p>Upon selection of States and prior to commencement of project activities in each State</p> <p>Throughout implementation of project activities at each State</p>	<p>PMUs at State level</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
10.2	<p>PROJECT GRIEVANCE MECHANISM: Develop and implement Project level GRM to address complaint/concerns related to Project activities.</p>	GRM to be prepared by effectiveness and the State-level GRM as condition of disbursements for each State.	PMU at federal and state level
CAPACITY SUPPORT (TRAINING)			
CS1	<p>Ensure that the project workers, contractors, implementing agencies, and relevant stakeholders are trained in the following areas:</p> <ul style="list-style-type: none"> • Stakeholder mapping and engagement • Implementation of ESMF, SMP, IPMP, LMP, BMP, RAP and RPF • E&S requirements of subprojects • Subproject environmental and social screening • World Bank ESF • Occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations. • Environmental and Social Risk Management procedures • Effective GRM operation • Technical, Planning and Operational Aspects of RAP • SEA/SH and Accountability and Response approach including CoC. • COVID 19 transmission, prevention, preparedness, and response 	Training will be started before commencement of the Project activities and will be implemented throughout the Project implementation	PMUs at federal and state level