

**Federal Republic of Nigeria**  
**Ministry of Budget and Economic Planning**

**Nigeria Community Action for Resilience and  
Economic Stimulus Program Additional  
Financing (P174114)**

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

**Appraisal Version**

**[27<sup>th</sup> January 2025]**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Nigeria (the “Recipient”) is implementing the Community Action for Resilience and Economic Stimulus Program Operation (the “Operation”), which consists of a Program component and a Project component (the “Project”), with the involvement of the Federal Ministry of Budget and Economic Planning, the Federal CARES Support Unit, and the Participating States as set out in the Original and Additional Financing Agreements (the “Agreements”). The International Development Association (the “Association”) has agreed to provide the original financing and additional financing for the Operation, as set out in the Agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for the Project referred to above.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (“ESSs”) and this Environmental and Social Commitment Plan (“ESCP”), in a manner acceptable to the Association. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreements, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient’s Representative specified in the Agreements, or the Director, Federal Ministry of Finance, or National Program Coordinator, Federal CARES Support Unit. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on “Indicators for Implementation Readiness” below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the “Timeframe” column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT</b>			
A	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain a Federal CARES Support Unit (FCSU) that is tasked with E&amp;S management with qualified staff and resources to support management of environmental, social, health and safety (E&amp;S) risks and impacts of the Project including an environmental specialist, a social specialist, a stakeholder engagement specialist, GBV specialist and grievance management specialist.</p>	<p>Establish the FCSU no later than 2 months after the Effective Date and thereafter maintain the FCSU throughout Project implementation. The Recipient will be obliged to diligently report any E&amp;S issues to the Association for guidance and support.</p>	<p>FMBEP</p>
B	<p><b>CAPACITY BUILDING PLAN/MEASURES</b></p> <p>Prepare and implement the capacity building plan as follows:</p> <ul style="list-style-type: none"> <li>training for federal environmental and social (E&amp;S), GBV and GM specialist and E&amp;S specialist of each result areas delivery platform at the state level on E&amp;S screening of microprojects and E&amp;S / OHS monitoring and reporting, GBV reporting and response protocol and GM management, stakeholders mapping.</li> </ul>	<p>Six months after Effective Date and throughout project implementation.</p>	<p>FCSU</p>
<b>MONITORING AND REPORTING</b>			
C	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&amp;S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> <li>Status of preparation and implementation of E&amp;S documents required under the ESCP.</li> <li>Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan.</li> </ul>	<p>Commencing each three (3) months after the Effective Date. Submit each report to the Association no later than 10 days after the end of each reporting period.</p>	<p>FCSU / State CARES Coordinating Unit (SCCU)</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> <li>Status of complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them.</li> <li>Status of GBV cases / complaints and referral process.</li> <li>Number and status of resolution of incidents and accidents reported under action E below.</li> </ul>		
D	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>Provide report of the independent verification agencies and third-party monitoring report including E&amp;S performance in accordance with the metrics specified in the respective contracts and terms of reference, submit such reports to the Association.</p>	Submit the Bi-annual report to the Association each six (6) months after the Effective Date upon request.	FCSU
E	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Notify the Association of any incident or accident relating to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p>	FCSU / SCCU
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.1	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b></p> <p>1. 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 PIU 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>2. Update and Implement Labor Management procedure, stakeholders' engagement plan and SEA/SH/GBV Action Plan.</p>	<p>1. Throughout project implementation.</p> <p>2. Update the SEP and SEA/SH/GBV Action plan 3 months after effectiveness and implement throughout project implementation.</p>	FCSU / SCCU
1.2	<p><b>MANAGEMENT OF CONTRACTORS / CONSULTANTS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, <i>inter alia</i>, labor management procedure, SEA/SH/GBV mitigation measures / Code of Conduct and OHS, into the E&amp;S specifications of the procurement documents and contracts with IVA contractors and third-Party Monitoring agency. Thereafter ensure that the IVA contractors and Third-Party Monitoring firms comply and that they require their subcontractors to comply with the E&amp;S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.</p>	Copies of relevant contracts provided to the Association upon request.	FCSU / SCCU
1.3	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Carry out the consultancies, capacity building, training, and any other technical assistance activities under the Project including engagement of IVA and Third-Party monitoring in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	Throughout Project implementation.	FCSU
1.4	<p><b>CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING</b></p> <p>Not Relevant under the project</p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.5	<b>ASSOCIATED FACILITIES</b>  Not Applicable		
1.6	<b>USE OF [BORROWER/RECIPIENT'S] ENVIRONMENTAL AND SOCIAL FRAMEWORK</b>  The use of Borrowers System is not considered		
1.7	<b>COMMON APPROACH</b>  The use of Common Approach is not considered under the project.		
1.8	<b>ACTIVITIES SUBJECT TO RETROACTIVE FINANCING</b>  There is no retroactive financing under the project.		
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<b>LABOR MANAGEMENT PROCEDURES</b>  Update and implement the Labor Management Procedures (LMP) for the Project throughout project implementation.	Update the LMP 3 months after the Effective Date and thereafter implement the LMP throughout Project implementation.	FCSU / SCCU
2.2	<b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</b>  Prepare and implement an OHS Management Plan to assess and manage the OHS risks and impacts of the Project.	Prepare the OHS Management Plan prior to commencement of microprojects activities and thereafter implement the plan throughout Project implementation.	FCSU / SCCU
2.3	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b>  Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Establish grievance mechanism prior to engaging Project workers (where applicable) and thereafter maintain and operate it throughout Project implementation.	FCSU / SCCU
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> [The relevance of ESS3 is established during the ESA process. ESS3 may require the preparation of specific measures to cover energy, water (e.g., water balance) and raw materials use, management of air pollution, hazardous and nonhazardous wastes, chemicals and hazardous materials and pesticides (pest management plan). Depending on the project, these measures may be set out in an E&S document (e.g., ESMP) already mentioned in the section under ESS1 above or as a stand-alone document or as a separate measure or action. <b>See sample actions below.</b> ]			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.1	<b>WASTE MANAGEMENT PLAN</b> Prepare and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes, consistent with ESS3.	Prepare the WMP prior to commencement of microprojects and thereafter implement the WMP throughout Project implementation.	FCSU /SCCU
3.2	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> No Relevant	Same timeframe as for the preparation and implementation of the WMP	FCSU / SCCU
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b> [The relevance of ESS4 is established during the ESA process. As with other ESSs, ESS4 may require the preparation of specific measures to cover community health and safety risks, including, inter alia, on infrastructure and equipment design and safety, safety of services, traffic and road safety, community exposure to health issues, ecosystem services, management and safety of hazardous materials, emergency preparedness and response, security (including engagement of security personnel), and safety of dams. Depending on the project, these measures may be set out in an E&S document (e.g., ESMP) already mentioned in the section under ESS1 above or as a stand-alone document or as a separate measure or action. <b>See sample actions below.</b> ]			
4.1	<b>TRAFFIC AND ROAD SAFETY</b> No Relevant	Same timeframe as for the preparation and implementation of the OHS plan	SCCU
4.2	<b>COMMUNITY HEALTH AND SAFETY</b> Assess and manage specific risks and impacts to the community arising from Project activities such as, risks of labor influx, response to emergency situations, and include mitigation measures in the OHS Plan to be prepared.	Same timeframe as for the preparation and implementation of the OHS Plan.	SCCU
4.3	<b>SEA AND SH RISKS</b> Update and implement SEA/SH Action Plan to assess and manage SEA/SH risk	Update the SEA/SH Action Plan no later than 3 months after effectiveness and thereafter implement the SEA/SH Action Plan throughout Project implementation.	FCSU / SCCU
4.4	<b>SECURITY MANAGEMENT</b> Not Relevant		
4.5	<b>DAM SAFETY (FOR ANNEX A ESS4)</b> Not Relevant		
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b> [The relevance of ESS5 is established during the ESA process. If resettlement documents need to be prepared (e.g., resettlement process frameworks, resettlement action plans, process frameworks) this should be reflected in the ESCP. <b>See sample actions below</b> ]			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
5.1	<b>RESETTLEMENT [FRAMEWORK] [PLAN] or [PLANS]</b>  Not Relevant		
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b> [The relevance of ESS6 is established during the ESA process. As with other ESSs, ESS6 may require the preparation of specific measures that may be set out in an E&S document (e.g., ESMP) already mentioned in the section under ESS1 above or as a stand-alone document or a separate measure or action. <b>See sample actions below</b> .]			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b>  Not Relevant		
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b> [See examples of possible actions below that can be used if determined that ESS7 is relevant, as set out in paragraph 54 of the E&S Policy and paragraphs 8-10 of ESS7.]			
7.1	<b>INDIGENOUS PEOPLES [FRAMEWORK] [PLAN] or [PLANS]</b>  Not Relevant		
<b>ESS 8: CULTURAL HERITAGE</b> [The relevance of ESS8 is established during the ESA process. As with other ESSs, ESS8 may require the preparation of specific measures that may be set out in an E&S document (e.g., ESMP) already mentioned in the section under ESS1 above or as a stand-alone document or a separate measure or action. <b>See sample actions below</b> .]			
8.1	<b>CULTURAL HERITAGE RISKS AND IMPACTS</b>  Not Relevant		
8.2	<b>CHANCE FINDS</b>  Not Relevant		
<b>ESS 9: FINANCIAL INTERMEDIARIES</b> [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
9.1	<b>ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)</b>  Not Relevant		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN</b>  Update and implement a Stakeholder Engagement Plan for the Project, consistent with ESS10, which shall include measures to 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.	Update the SEP no later than 3 months after the Effective Date implement the SEP throughout Project implementation.	FCSU



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, 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 be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	Implement the grievance mechanism no later than 3 months after the Effective Date and thereafter maintain and operate the mechanism throughout Project implementation.	FCSU / SCCU
<p><b>INDICATORS FOR IMPLEMENTATION READINESS</b> [This subsection lists the ESCP actions (by their numbering in the first column of the ESCP) that are identified as relevant to monitor project readiness from an E&amp;S standpoint. These may include actions related to: i) establishment of E&amp;S risk management units in the Project Implementation Entities, ii) recruitment and training of E&amp;S staff within Project Implementation Entities, iii) Memorandums of Understanding or other written agreements/arrangements between Project Implementation Entities and other concerned agencies to ensure proper coordination of E&amp;S risk management activities; iv) E&amp;S effectiveness or disbursement conditions, if deemed warranted, v) ES assessments and plans to be prepared by the Borrower at the onset of implementation; vi) other project-specific requirements related to E&amp;S readiness for implementation].</p>			
<p>The following actions are indicators for implementation readiness:</p> <p>Actions:</p> <p>A</p> <p>1.1</p> <p>2.1</p> <p>4.3</p> <p>10.1</p> <p>10.2</p>			