

# Federal Republic of Nigeria

## Rural Access and Agricultural Marketing Project Scale-Up (RAAMP-SU) (P180640)

[Draft Version]

### ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

May 2024

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Nigeria (hereinafter the Recipient) is implementing the Rural Access and Agricultural Marketing Project Scale-Up (RAAMP-SU) (the Project), with the involvement of the Federal Ministry of Agriculture and Food Security (FMAFS) through the Federal Project Management Unit (FPMU) at the Federal level, and the respective State Ministries through the State Project Implementing Units (SPIUs) at the state level, as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the referred agreement(s). The Parent Project of the Rural Access and Agricultural Marketing Project (RAAMP) is currently being implemented in 19 states with financing support from the Association. With the success of the Parent RAAMP Project, the Recipient is scaling up the number of participating states from 19 to all additional states in the country that would meet the selection requirements.
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 Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
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, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.

As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the Federal Ministry of Agriculture and Food Security (FMAFS) and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Federal Ministry of Finance. The Recipient shall promptly disclose the updated ESCP.

| MATERIAL MEASURES AND ACTIONS   |  | TIMEFRAME   | RESPONSIBLE ENTITY   |
|---------------------------------|--|---|--|
| <b>MONITORING AND REPORTING</b> |  |   |  |
| A                               | <p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Association regular monitoring reports on the 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 instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>  | <p>Submit quarterly reports to the Association throughout Project implementation, commencing after the Effective Date.</p> <p>Submit each report to the Association no later than 7 days after the end of each reporting period.</p>  | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States |
| B                               | <p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the Association of any incident or accident related to the Project that has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public, or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), project-related occupational health and safety issues and accidents that result in death, serious or multiple injuries, labor unrest, disease outbreaks, and security incident.</p> <p>Provide sufficient detail regarding the scope, severity, and possible causes of 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/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p> | <p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>Notify the Association of SEA/SH incidents within 24 hours of learning of the incident.</p> <p>Provide subsequent reports to the Association within an acceptable timeframe.</p> <p>A detailed Investigation report shall be provided within 10 days after the incident</p> | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States |
| C                               | <p><b>CONTRACTORS’ MONTHLY REPORTS</b></p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance following the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>  | Submit the Contractor's monthly reports to the Association as annexes to the regular progress/monitoring reports to be submitted under action A above.  | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States |
| D                               | <p><b>NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS</b></p> <p>Notify the Association of any referral submitted to the Dispute Avoidance and Adjudication Board (DAAB) to initiate a process of compliance review in relation to a contractor’s obligations to prevent and respond to sexual exploitation and abuse (SEA), and/or sexual harassment (SH) specified in the respective works contract with such contractor; and, in the event of any such referral, notify the Association of: (i) the DAAB’s decision on such referral; (ii) the contractor’s Notice of Dissatisfaction, if any, with such DAAB decision; (iii) any notification received on the commencement of an emergency</p>   | No later than 7 days after the issuance or receipt, as applicable, of the relevant document (i.e., referral to the DAAB, issuance of DAAB decision, Notice of Dissatisfaction, notice of commencement of emergency/full arbitration, emergency/full arbitration order, as applicable).  | FPMU at Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States     |

| MATERIAL MEASURES AND ACTIONS   |   | TIMEFRAME   | RESPONSIBLE ENTITY   |
|---|---|---|--|
|   | arbitration proceeding or full arbitration proceeding in relation to the DAAB's decision; and (iv) the resulting emergency arbitration order and/or full arbitration order, if any.   |   |  |
| <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 environmental and social management sub-units within the Federal Project Management Unit (FPMU) and the State Project Implementation Units (SPIUs) with qualified specialists to manage the Project ESHS risks, including an Environmental officer, a Social Specialist, a Gender-based violence specialist, and a Security Advisor. States may engage Technical Assistants to support the E&amp;S Teams on a need basis and all staff will be engaged on a full-time basis.</p>   | <p>The Environmental, Social, and GBV/Gender Officers will be fully deployed from the Ministry of Environment and the Ministry of Women Affairs respectively before Project effectiveness, and thereafter maintain these positions throughout Project implementation.</p> <p>The Security Advisor will be hired no later than three months after effectiveness and thereafter maintained throughout Project implementation.</p>   | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States |
| 1.2   | <p><b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <p>1. Adopt and implement a site-specific Environmental and Social Management Plan (ESMP), borrow pit management and reclamation plan, and Traffic Management Plan (TMP) for construction and rehabilitation works, and operation phase, consistent with the relevant ESSs.</p> <p>2. Adopt and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p> <p>3. FPMU and SPIUs to adopt and implement the Environmental and Social Management Framework (ESMF) and SPIUs to adopt and implement site-specific Environmental and Social Management Plan (ESMP), as set out in the ESMF.</p> | <p>1. Adopt the C-ESMP before commencement of civil works, and thereafter implement the C-ESMP throughout civil work. Adopt and implement operation phase ESMP and throughout Project implementation.</p> <p>2. Adopt the ESMF before the completion of project appraisal, and thereafter implement the ESMF throughout Project implementation for sub-project screening</p> <p>3. Ensure bidding documents integrate ES requirements and bill of quantity including but not limited to road safety, OHS, community health and safety and labour management procedures.</p> | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States |
| 1.3   | <p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>Prepare, consult upon, adapt, disclose, and implement the following instruments in accordance with the ESSs and a manner acceptable to the Association:</p>   | Adopt, consult upon, and disclose ESMF, RPF, LMP, and SEP before Project appraisal (by Federal PMU)   | FPMU at the federal level  |

| MATERIAL MEASURES AND ACTIONS   | TIMEFRAME   | RESPONSIBLE ENTITY  |
|---|---|---|
| <ul style="list-style-type: none"> <li>i. Environmental and Social Management Framework (ESMF);</li> <li>ii. Resettlement Policy Framework (RPF);</li> <li>iii. Labor Management Procedure (LMP)</li> <li>iv. Stakeholder Engagement Plan (SEP)</li> <li>v. SEA /SH Action Plan</li> </ul> <p>Each participating state is also required to prepare its state-level Security Management Plan (SMP) as a state-level SEP before the 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, before the commencement of project activities:</p> <ul style="list-style-type: none"> <li>a) Environmental and Social Management Plan (ESMP)</li> <li>b) Resettlement Action Plan (RAP)</li> <li>c) Burrow pit management plan</li> </ul> | <p>Full SMP to be ready prior to the start of the civil works for each participating States.</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 before the 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 ESMP (including construction and operation phase TMP), borrow pit management and reclamation plan and RAPs will be completed, consulted upon disclosed by State PMUs, and approved by the Federal PMUs and the Association before commencement of project activities.</p> <p>Contractors will adopt specific activities consistent with LMP approved by PMU before start of work.</p> |   |
| <p>1.3 <b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&amp;S instruments and the Contractor ESMP, the Labor Management Procedures, Security Management Plan, Codes of Conduct, borrow pit management and reclamation plan into the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>   | <p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation.</p>   | <p>FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States</p> |

| MATERIAL MEASURES AND ACTIONS   |   | TIMEFRAME   | RESPONSIBLE ENTITY   |
|---|---|---|--|
| 1.4   | <p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>  | Throughout Project implementation.  | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States                               |
| <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) for the Project, including, inter alia, provisions on working conditions, management of workers' relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p> <p>The provisions of the LMP will be adopted by contractors, the Federal and State PMUs, and other relevant implementing agencies.</p> | Adopt the LMP before completion of project appraisal and thereafter implement the LMP throughout Project implementation.  | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States                               |
| 2.2   | <p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>   | Establish a labor grievance mechanism before engaging Project workers and thereafter maintain and operate it throughout Project implementation  | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States Environmental and Social team |
| 2.3   | <p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) PLAN</b></p> <p>Adopt and implement occupational, health and safety (OHS) measures specified in the ESMPs.</p>   | OHS plan will be prepared, adopted, and embedded in the site-specific ESMPs to be prepared once the subproject site is known and before launching the bidding process and maintained throughout Project implementation. | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States Environmental and Social team |
| <b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> |   |   |  |
| 3.1   | <p><b>WASTE MANAGEMENT PLAN</b></p> <p>Adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>   | Adopt the WMP (as part of the ESMP) before the commencement of construction and rehabilitation works, and implement the WMP throughout Project implementation   | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States Environmental and Social team |

| MATERIAL MEASURES AND ACTIONS             |   | TIMEFRAME  | RESPONSIBLE ENTITY   |
|---|---|--|--|
| 3.2                                       | <p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.2 above.</p>  | Adopt the ESMP before the commencement of the construction and rehabilitation works, and thereafter implement throughout Project implementation.   | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States |
| <b>ESS 4: COMMUNITY HEALTH AND SAFETY</b> |   |  |  |
| 4.1                                       | <p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2 above.</p>  | Adopt the C-ESMP including construction phase TMP before the start of construction and rehabilitation works, and thereafter implement throughout Project implementation. Ensure TMP foresees adequate GIIP measures and materials for the protection of community, project sites, and workers. | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States |
| 4.2                                       | <p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>Assess and manage specific risks and impacts to the community arising from Project activities including the behavior of Project workers, risks of labor influx, and response to emergencies, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Association. These may include, where relevant, mitigation measures to minimize/manage the risks/impacts associated with uncovered or barricaded or unfenced and/or unsigned hazardous areas such as excavated sites, trenches, and exposed metal or iron rods e.g Burrow Pit Management Plan. Major community health and safety risks associated with the project related work would be during construction phase and related to traffic management, borrow pit/ quarry management, and SEA/SH.</p> | Adopt the C-ESMP (including TMP and proper borrow pit/quarry management) before starting construction and rehabilitation works, and thereafter implement throughout Project implementation. Adopt and implement operation phase ESMP and implement throughout Project implementation.          | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States |
| 4.3                                       | <p><b>SEA AND SH RISKS</b></p> <p>Adopt and implement a SEA/SH Action Plan as part of the GBV Action Plan and Accountability &amp; Response Framework to assess and manage the risks of SEA and SH. Ensure project workers and communities are sensitized on this issue.</p>  | Adopt the SEA/SH Action Plan and Accountability & Response Framework before construction, and thereafter implement throughout Project implementation.  | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States |
| 4.4                                       | <p><b>SECURITY MANAGEMENT</b></p> <p>Revise, update, and implement a Security Management Plan (SMP) to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, 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 personnel.</p>   | Before engaging security personnel and thereafter implemented throughout Project implementation.   | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States |

| MATERIAL MEASURES AND ACTIONS   |  | TIMEFRAME  | RESPONSIBLE ENTITY   |
|---|--|--|--|
| <b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>                                       |  |  |  |
| 5.1   | <p><b>RESETTLEMENT POLICY FRAMEWORK</b><br/>Adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.</p>   | Adopt the RPF prior to project appraisal and thereafter implement the RPF throughout Project implementation.   | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States |
| 5.2   | <p><b>RESETTLEMENT PLANS</b><br/>Adopt, and implement Resettlement Action Plans (RAPs) in accordance with ESS 5 and consistent with the requirements of the Resettlement Policy Framework (RPF) and consistent with ESS5 and acceptable to the Association.</p> <p>Consult on, disclose, and implement all RAPs before the commencement of civil works in all sites under the project &amp; complete the RAP implementation audit.</p> <p>Deposit funding allocated for the RAP implementation for each impact location in a designated RAP account.</p> <p>Submit compensation and resettlement assistance payments completion report to and for the Association’s clearance before commencing civil works at each impact site/location</p> | Before the commencement of any civil works. Ensure final project design is adjusted to avoid/minimize resettlement especially on the right of way (RoW) of the road rehabilitation components. | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States |
| 5.3   | <p><b>GRIEVANCE MECHANISM</b><br/>Adopt and implement a grievance mechanism to address resettlement-related complaints, as described in the RPF, SEP, and RAP.</p>   | Adopt and implement the grievance mechanism prior to the commencement of resettlement activities   | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States |
| <b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>                              |  |  |  |
| 6.1   | <p><b>BIODIVERSITY RISKS AND IMPACTS</b><br/>Adopt and implement a Biodiversity Management Plan (BMP) as part of the site-specific ESMP, in accordance with the guidelines of the ESMF prepared for the Project, and consistent with ESS6.</p>   | Adopt the BMP and implement it at the start of works and thereafter throughout the project implementation..  | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States |
| <b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES: NOT APPLICABLE</b> |  |  |  |
| <b>ESS 8: CULTURAL HERITAGE</b>   |  |  |  |
| 8.1   | <p><b>CULTURAL HERITAGE RISKS AND IMPACTS</b><br/>Adopt and implement a Cultural Heritage Management Plan (CHMP) as part of the ESMF and site-specific ESMPs to be developed, and consistent with ESS8.</p>  | Adopt the CHMP before, and during construction   | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States |

| MATERIAL MEASURES AND ACTIONS                                    |   | TIMEFRAME  | RESPONSIBLE ENTITY   |
|--|---|--|--|
| 8.2  | <p><b>CHANCE FINDS</b></p> <p>Describe and implement the chance finds procedures, as part of the ESMF and site-specific ESMPs to be developed.</p>  | Implement the procedures before, and during construction   | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States |
| <b>ESS 9: FINANCIAL INTERMEDIARIES: NOT APPLICABLE</b>           |   |  |  |
| <b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b> |   |  |  |
| 10.1   | <p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, 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>  | Adopt the SEP before project appraisal and thereafter implement the SEP and continue to update throughout Project implementation.                        |  |
| 10.2   | <p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate the 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>                      | Establish the grievance mechanism by completion of project appraisal and thereafter maintain and operate the mechanism throughout Project implementation | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States |
| <b>CAPACITY SUPPORT</b>  |   |  |  |
| CS1  | <p>Ensure ESF Capacity building training for the FPMU and SPIUs in the following areas;</p> <ul style="list-style-type: none"> <li>• Specific aspects of social risk management, including GBV SEA/SH risks, resettlement planning, voluntary land donation, stakeholder engagement, Labor management; impacts, and mitigation measures for FPMU and SPIU teams.</li> <li>• Implementation of Grievance Mechanism</li> <li>• Occupational Health and safety at work for contractors</li> <li>• Traffic management and community health and safety during constructionSEA/SH and Accountability and Response approach including CoC.</li> <li>• Code of Conduct training for contractors</li> <li>• Security Protocol and Management</li> <li>• Borrow pit/quarry management and community and safety</li> </ul> | Training will be started before the commencement of the Project activities and will be implemented throughout the Project implementation                 | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States |

| MATERIAL MEASURES AND ACTIONS |   | TIMEFRAME                     | RESPONSIBLE ENTITY   |
|-------------------------------|---|-------------------------------|--|
| CS2                           | <ul style="list-style-type: none"> <li>• Occupational Health and safety at work</li> <li>• Emergency prevention and preparedness and response Strategy</li> <li>• Security Management Strategies</li> <li>• Traffic management and community health and safety during operation phases</li> <li>• SPESSE program</li> </ul> | During project implementation | FPMU at the Federal Ministry of Agriculture and Food Security (FMAFS) and the Participating States |