



Federal Ministry of Agriculture  
and Food Security - FMAFS



RAAMP - SU  
Rural Access and Agricultural  
Marketing Project Scale - Up

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

## Environmental and Social Management Framework ESMF

DRAFT FINAL REPORT

May 2024



# RAAMP-SU

## Draft Final Report

Environmental and Social Management Framework (ESMF) for the Nigeria Rural Access and Agricultural Marketing Scale-Up Project (RAAMP-SU)

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

## Environmental and Social Management Framework ESMF

### DRAFT FINAL REPORT

Consultancy Services for the Preparation of an Environmental and Social Management Framework (ESMF) for the Nigeria Rural Access and Agricultural Marketing Scale-Up Project (RAAMP-SU)



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Environmental and Social Management Framework (ESMF) for the Nigeria Rural Access and Agricultural Marketing Scale-Up Project (RAAMP-SU)

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# ACRONYMS AND ABBREVIATIONS

ACHPR	African Commission on Human and Peoples' Rights
ACReSAL	Agro-Climatic Resilience in Semi-Arid Landscapes
ACTU	Anti-Corruption Unit
ADPs	Agricultural Development Projects
ADSEPA	Adamawa State Environmental Protection Agency
ADWMA	Adamawa State Waste Management Agency
AEPB	Abuja Environmental Protection Board
AFD	French Development Agency
AfDB	African Development Bank
AKSEPWMA	Akwa Ibom State Environmental Protection and Waste Management Agency
ARAP	Abbreviated Resettlement Action Plan
ARMA	Anambra State Road Maintenance Agency
ASEPA	Abia State Environmental Protection Agency
ANSEPA	Anambra State Environmental Protection Agency
ATR	African Traditional Religion
BASEPA	Bauchi State Environmental Protection Agency
BENSESA	Benue State Environmental Sanitation Authority
CADP	Commercial Agricultural Development Project
CBOs	Community Based Organizations
CO	Carbon Monoxide
CoC	Code of Conduct
CARES	Covid-19 Action Recovery and Economic Stimulus project
CCA	Climate Change Act
CD-Waste	Construction and Demolition Wastes
CHS	Community Health and Safety
CITES	Convention to Regulate International Trade in Endangered Species
CRA	Child Rights Act
CRC	Convention on the Rights of the Child
CEDAW	Convention on the Elimination of All Forms of Discrimination against Women
CESMP	Contractors Environmental and Social Management Plan
CDRF	Capacity Development Results Framework
CHMP	Cultural Heritage Management Plan
CRC	Convention on the Rights of the Child
CRPD	Convention on the Rights of Persons with Disabilities
CSDA	Community and Social Development Agency
CSO	Civil Society Organizations
DFI	Development Financing Institutions
DFID	Department for International Development
EA	Environmental Assessment
EBSEPA	Ebonyi State Environmental Protection Agency
ECoPs	Environmental Codes of Practice
EKSEPA	Ekiti State Environmental Protection Agency
EKSWMA	Ekiti State Waste Management Authority
EHSGs	Environmental, Health and Safety Guidelines
EMS	Environmental Management Systems
ERP	Emergency Response Plan
ESCP	Environmental and Social Commitment Plan
ESIA	Environmental and Social Impact Assessment
ESSA	Environmental and Social Screening Assessments
ESIRT	Environment and Social Incident Response Toolkit
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework

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ESMP	Environmental and Social Management Plan
ESO	Environmental Safeguard Officer
ESSs	Environmental and Social Standards
E & S	Environmental and Social
EU	European Union
FCT	Federal Capital Territory
FDA	Federal Department of Agriculture
FDC	Federal Department of Cooperatives
FDf	Federal Department of Fertilizer
FDLPC	Federal Department of Livestock and Pest Control Services
FDLR	Federal Department of Land Resources
FDRD	Federal Department of Rural Development
FDPRS	Federal Department of Planning, Research and Statistics
FDSSGR	Federal Department of Storage and Strategic Grain Reserve
FEC	Federal Executive Council
FGN	Federal Government of Nigeria
FMAFS	Federal Ministry of Agriculture and Food Security
FMEnv	Federal Ministry of Environment
FMoH	Federal Ministry of Health
FMoF	Federal Ministry of Finance
FMLHUD	Federal Ministry of Lands, Housing & Urban Development
FMWA	Federal Ministry of Women Affairs
FMWH	Federal Ministry of Works and Housing
PPFMD	Federal Project Financial Management Department
FPIC	Free, Prior and Informed Consent
FPMU	Federal Project Management Unit
FRSC	Federal Roads Safety Corps
FTS	Fatality Tracking System
GAP	Gender Based Violence Action Plan
GBV	Gender Based Violence
GDP	Gross Domestic Product
GFDRR	Global Facility for Disaster Reduction and Recovery
GIIP	Good Industry and International Practice
GoN	Government of Nigeria
GPN	Good Practice Notes
GRM	Grievance Redress Mechanism
HAZCOM	Hazard Communication
HIV	Human Immune Deficiency Virus
HRA	Hazard/Risk Assessment
ICCPR	International Covenant on Civil and Political Rights
ICESCR	International Covenant on Economic, Social and Cultural Rights
IDA	International Development Association
IE	Infrastructure Engineer
IEE	Initial Environmental Examination
ILO	International Labour Organization
IPF	Investment Project Financing
ITCZ	Inter-Tropical Convergence Zone
IUCN	International Union for Conservation of Nature
IWMA	Ibadan Waste Management Authority
JICA	Japan International Cooperation Agency
JISEPA	Jigawa State Environmental Protection Agency
KAROTA	Kano Road Traffic Agency
KASUPDA	Kaduna State Urban Planning & Development Agency
KSEPA	Kano State Environmental Protection Agency

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KTSEPA	Katsina State Environmental Protection Agency
RPF	Resettlement Policy Framework
RTI	Research Triangle Institute
RTTP	Rural Travel and Transport Program
RVPs	Regional Vice Presidents
SCAP	Safeguards/Standards Corrective Action Plan
SE	Stakeholder Engagement
SEA	Sexual Exploitation and Abuse
SEEFOR	State Employment and Expenditure for Results Project
SEMA	State Emergency Management Agency
SEP	Stakeholder Engagement Plan
SEPA	State Environmental Protection Agencies
SFDs	State Forestry Departments
SDG	Sustainable Development Goals
SMWA	State Ministry of Women Affairs
SORT	Systematic Operations Risk Rating Tool
SPCs	State Project Coordinators
SPD	Standard Procurement Document
SPIU	State Project Implementation Unit
SPMC	State Project Monitoring Committee
SRA	Security Risk Assessment
SRF	State Road Fund
SSOs	Social Safeguard Officer
STDs	Sexually Transmitted Diseases
STIs	Sexually Transmitted Infections
SURWASH	Sustainable Urban and Rural Water Supply, Sanitation and Hygiene Program
SWMAs	State Waste Management Agencies
TA	Technical Assistant
TARCMA	Taraba Road Construction and Maintenance Agency
TBD	To be Determined
TMP	Traffic Management Plan
TOR	Terms of Reference
TRIMING	Transforming Irrigation Management in Nigeria
TTL	Task Team Leader
UNFCCC	United Nations Framework Convention on Climate Change
USAID	United States Agency for International Development
USD	United States Dollar
VAC	Violence Against Children
VAPP	Violence Against Persons Prohibition Act
VES	Vehicle Exhaust Screening
VET	Vehicle Emission Testing
VOCs	Volatile Organic Compounds
WASH	Water, Sanitation and Hygiene
WASHNORM	Water Sanitation and Hygiene National Outcome Routine Mapping
WB	World Bank
WBG	World Bank Group
WHO	World Health Organization
YOSEPA	Yobe State Environmental Protection Agency
ZAGIS	Zamfara Geographic Information Service
ZAROTA	Zamfara Road Traffic Agency
ZESA	Zamfara Environmental Sanitation Agency

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# EXECUTIVE SUMMARY

## ES 1: Project Background

The Federal Government of Nigeria (FGN) has requested the World Bank (WB) to increase the number of states participating in the current Nigeria Rural Access and Agricultural Marketing Project (RAAMP). Presently, there are 19 pioneer participating states under RAAMP, however the next phase of the RAAMP program, which will be the Rural Access and Agricultural Marketing Project – Scale Up (RAAMP-SU) will be open to all states in Nigeria (36 states including the Federal Capital Territory (FCT)). The project will be guided by the Government’s Rural Travel and Transport Program (RTTP). The lead implementing agency is the Federal Department of Rural Development (FDRD) of the Federal Ministry of Agriculture and Food Security (FMAFS). The Federal Project Management Unit (FPMU) which is currently overseeing RAAMP will direct and coordinate the affairs of the RAAMP-SU on behalf of FDRD, while the state governments of the prospective states will implement the RAAMP-SU through State Project Implementation Units (SPIUs). The Project Development Objective (PDO) of RAAMP - SU is to improve rural access while strengthening the financing and institutional framework for a sustainable rural road network in prospective states. The RAAMP Scale-Up will focus on connecting rural communities to local agricultural markets such as roadside agro-logistics hubs, social amenities such as schools and hospitals, introduce innovative approach of Green Roads for Water into the project design to enhance the resilience of the project as well as promote social cohesion at rural level.

The Scale-up has been designed to have four (4) components as detailed in chapter two of this report, these include:

- **Component A: Improvement of Improvement of Resilient Rural Access**  
The component comprises three subcomponents:  
**Sub-Component A.1:** *Climate-Informed Rural Roads Rehabilitation/Upgrade*  
**Sub-Component A.2:** *Technical support for Rural Roads rehabilitation/upgrade*  
**Subcomponent A.3:** *Social inclusion and promotion of gender equality*
  
- **Component B: Climate Resilient Asset Management**  
This component comprises of two sub-components:  
**Sub-Component B.1:** *Asset Management Improvement and Resilience Scale Up.*  
**Sub-Component B.2:** *Development and implementation of a climate risk informed road asset management system*
  
- **Component C: Institutional Strengthening and Project Management**  
The component comprises of two sub-components:  
**Sub-Component C.1:** *Project Management*  
**Sub-Component C.2:** *Institutional Strengthening and sector reforms.*
  
- **Component D: Contingent Emergency Response**

The proposed RAAMP Scale Up shall be a nationwide project which is open to all 36 states of the country and the Federal Capital Territory (FCT) to participate in the project provided they meet the selection requirements.

## ES 2: Rationale for the RAAMP-SU ESMF

The overall environmental and social risks of the project are Moderate. Eight out of the ten Environmental and Social Standards: ESS1 (Assessment and Management of Environmental and Social Risks and Impacts), ESS2 (Labor and Working Conditions), ESS3 (Resource Efficiency and Pollution Prevention and Management), ESS4 (Community Health and Safety), ESS5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement), ESS6 (Biodiversity Conservation and Sustainable Management of Living Natural Resources), ESS8 (Cultural Heritage), and ESS10 (Stakeholder Engagement and Information Disclosure) are relevant to the RAAMP-SU.



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Under the Parent Project (RAAMP), an ESMF was prepared in line with the World Bank Operational Policies. The rationale for preparing this ESMF is to update the existing ESMF in line with the requirements of the World Bank Environmental and Social Framework (ESF), and to assist FDRD in examining the environmental and social risks and impacts of the RAAMP-SU. It guides the FDRD to assess potential environmental and social risks and impacts of the SU's interventions when subprojects' locations cannot be determined during project preparation. It sets out the principles, rules, guidelines, and procedures to assess the potential environmental and social (E&S) risks and impacts. It provides adequate information on the area in which subprojects are expected to be sited, including any potential E&S vulnerabilities of the area; and on the potential impacts that may occur and mitigation measures that might be expected to be used.

### ES 3: Objectives of the ESMF

The overall objective of this ESMF is to revise/update and adopt the existing ESMF to guide E&S management under the RAAMP-SU. The updated framework will provide guidelines for assessing the environmental, socio-economic, and health risks and impacts of the project as well as recommending appropriate generic mitigation measures and monitoring plans in line with the relevant Environmental and Social Standards (ESS).

### ES 4: Legal and Administrative Frameworks

Several laws and regulations apply to the RAAMP-SU to promote environmental and social sustainability of the project. The regulatory power for all environmental matters is vested in the Federal Ministry of Environment (FMEEnv), which is charged with the responsibility of ensuring that all developmental projects are carried out in compliance with relevant environmental laws and regulations including relevant International Laws and Conventions. This ESMF has been prepared in line with relevant Nigeria Laws including the Environmental Impact Assessment (EIA) Act CAP E12 LFN 2004 and the National Policy on the Environment, 1989 (Revised 2016), Nigeria Labor Law (2004), Child right Act (2003), National Gender Policy (2006), Nigerian Land Use Act of 1978, World Bank Environmental and Social Framework and the World Bank Group Environmental Health and Safety Guidelines amongst others as detailed in chapter 3 of this report.

### ES 5: Environmental and Social Baseline Conditions

Nigeria, situated in West Africa along the Gulf of Guinea, spans 923,768km<sup>2</sup>, with a coastline of 853km. It shares borders with Benin, Cameroon, Chad, and Niger, boasting a territorial sea of 12 nautical miles and an exclusive economic zone of 200 nautical miles. The nation is administratively divided into 36 states and the Federal Capital Territory. The 36 states are further sub-divided into 774 LGAs. The states are further aggregated into six geopolitical zones: North-West, North-East, North-Central, South-East, South-South, and South-West geopolitical zones. The environmental and social baseline conditions of the project area is summarized in the table below.

Environmental Baseline (Physical and Biological)	
<b>Topography</b>	Nigeria has five major geographic regions. A low coastal zone along the Gulf of Guinea; hills and low plateaus north of the coastal zone; the Niger–Benue River valley; a broad stepped plateau stretching to the northern border with elevations exceeding 1,200 m; and a mountainous zone along the eastern border, which includes the country's highest point, Chappal Waddi (2,419 meters). Source: Geography of Nigeria (2022)
<b>Hydrology &amp; Hydrogeology</b>	<p><b>Surface Water:</b> There are many rivers in Nigeria but the two principal river systems are the Niger – Benue and the Chad. The Niger River, the largest in West Africa, flows 4,000 km from Guinea through Mali, Niger, Benin, and Nigeria before emptying into the Gulf of Guinea. The Benue River and largest tributary flows 1,400 km from Cameroon into Nigeria, where it empties into the Niger River. The country's other river system involves various rivers that merge into the Yobe River, which then flows along the border with Niger and empties into Lake Chad.</p> <p><b>Groundwater:</b> The major aquifers in Nigeria are Basement aquifers, Sedimentary basins, Volcanic plateau, and River alluvium. There are eight major regional aquifer systems, 30 local and minor aquifers and 36 aquicludes, aquitards, and aquifuges in Nigeria. Generally, groundwater in most of the aquifers in Nigeria are fresh with low concentrations of total dissolved solids (&lt;500 mg L<sup>-1</sup>). However, groundwater is exposed to active pollution in major cities and rural communities due to increased urbanization, indiscriminate waste disposals, industrial activities etc. Source: Nigeria Hydrological Services Agency (2018)</p>
<b>Geology</b>	Nigeria's land mass is made up of two main rocks, Precambrian basement rocks which covers about two-thirds of the country's landmass and Sedimentary rocks of Cretaceous about half of the country. Other minor formations are the Tertiary Volcanics, Tertiary sediments etc. The Precambrian basement rocks consisting of gneisses, migmatites, schist, and various metamorphic rocks and granites Source: Nigeria Geological Survey Agency (NGSA)

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<b>Environmental Baseline (Physical and Biological)</b>	
<b>Climate</b>	<p>The project area of influence (which cuts across Nigeria) is divided into three main climatic regions: Tropical Rain Forest Region, Near Desert Region, and Savannah Region. However, due to unequal elevations in different parts of the country, there are differences in temperature and rainfall distribution. The tropical rainforest region covering the southern part of the country, has an annual rainfall of around 2,000 mm (80 inches), the near desert region covering the far north of the country with an annual rainfall around 500 mm (20 inches) and the savannah region covering the central portion of the country has annual rains around 1,000 mm (40 inches). The climate in Nigeria is semi-arid in the north, and humid in the south. Source: World Bank Climate Change Knowledge Portal</p> <p><b>Climate Impacts and Vulnerability of Project Prospective States</b> Climate impacts and vulnerability vary across the RAAMP-SU Prospective States and the FCT. States within the same or similar ecological zone share broadly the same climate impacts and vulnerabilities. Flooding is a dominant climate impact in the North-Central states of Benue, Kogi, Kwara, Nasarawa, FCT, and Niger. Niger State also experiences drought, and this can be linked to its proximity to the northwest. The main impact of climate change in the North (North East and North West) is desertification, land degradation, and drought. For the south (South East, South West and South South), the major types of climate change impacts are flooding, gully and coastal erosions which have led to loss of arable land. It is important to point out that for the entire country, temperature changes are constant climate change impacts. This has resulted from an increase in global warming, and of course irregular rainfall patterns. Source: Climate Impacts, Policies and Actions at the Sub-national Level in Nigeria (2023) – Department of Climate Change; Federal Ministry of Environment (FMEEnv)</p>
<b>Soil</b>	<p>Soil types in Nigeria vary according to their composition, physical, chemical, morphological and mineralogical characteristics. These vary from Sandy Clay, Sandy Loam, Clay Loam in the North West and North East geopolitical zones (with some Concretionary Clay in the North East); mostly Sandy Clay in the North Central geopolitical zone with few patches of Clay Loam and Sandy Loam. In the South West, the soil type is largely Sandy Loam with some patches of Clay Loam. In the South-South, there are deposits of Silty Loam together with Sandy Loam and Clay Loam. In the South East, the soil type is mostly Sandy Clay and traces of Sandy Loam. Source: Nigeria Institute of Soil Science</p>
<b>Vegetation</b>	<p>Savannah and Forest are the predominant types of vegetation in Nigeria. The savannah vegetation stretches from the central parts of Nigeria to the extreme northern parts. It is divided into: i) Sahel savannah: in the North-Eastern borders, ii) Short grass Sudan savannah: stretching from upper western borders to the North-Western borders and, iii) Woodland/Tall grass Guinea Savannah (lying below the short grass savannah and covering the central states and parts of the eastern region of the country). The tropical forest vegetation covers the remaining southern portion of the country and is divided into three types: i) Rain Forest with tall trees, ii) Fresh water swamp consisting of both fresh and saltwater swamps and iii) Mangrove Forest which is made up of mangrove vegetation. Source Nigeria Conservation Foundation (NCF)</p>
<b>Biodiversity &amp; Nature Protection.</b>	<p>Nigeria ranks 36th in the world of countries with the highest biodiversity. It is widely believed that the areas surrounding Calabar in Cross River State contain the world's largest diversity of butterflies. The drill monkey is only found in the wild in Southeast Nigeria. The total number of higher plant species in Nigeria is 4,715 (of which 119 are threatened). For mammals, the total number of species is 274, and for breeding birds the total known species is 286. According to the International Union for Conservation of Nature (IUCN) Red List, Nigeria has a total of 23 critically endangered, 42 endangered and 104 vulnerable animal species. Those classified as critically endangered in Nigeria include the Niger Delta red colobus (<i>Piliocolobus epieni</i>), Cross River gorilla (<i>Gorilla gorilla diehli</i>), Gambles's relic (<i>Pentaplebia gamblesi</i>), Gambles's flatwing (<i>Neurolestes nigeriensis</i>) and Perret's toad (<i>Sclerophrys perreti</i>). Nigeria has 1,001 protected areas (nature reserves, wilderness areas, national parks), covering a total 5.5 million ha. The total land area under protection represents 6% of the total land area. Under categories I and II (the highest level of protection) Nigeria has 2.5 million ha. Sources: International Union for Conservation of Nature (IUCN); Protected Plant</p>
<b>Social Baseline</b>	
<b>Population &amp; Demographics</b>	<p>Nigeria is the most populous country in Africa and the 6th most populous country in the world. Nigeria has the 16th highest percentage population under 18 Years of age in the world (50.4 % of the population). Nigeria's population is estimated to be 223,804,632. This is based on the annual exponential population growth rate of 2.41%. Sources: National Boundary Commission (NBC); National Population Commission (NPC)</p>
<b>Gender Based Violence</b>	<p>In Nigeria, there are currently 39,109 reported cases, with 1,849 fatal cases, 27,228 closed cases, 11,881 open cases, and 571 Convicted Perpetrators (March, 2024). Currently, there are 893 GBV service providers across all states in Nigeria recognized by the Federal Ministry of Women Affairs. Importantly, besides interpersonal and sexual violence, child marriage and Female Genital Mutilation are the other culturally harmful practices prevalent across Nigeria. Conflict in the North East has further contributed a steep rise in targeted violence against women and children by Boko Haram increasingly for abduction and violence. Remarkably, in Nigeria, Donor-funded projects are encouraging the inclusion of practices, assessments and activities that factor in GBV risks assessment and mapping of GBV services as well as preparation of GBV action plans to aid safe implementation of their programs/projects especially where influx of labour and other factors may increase SEA/SH/GBV risks. Source: Federal Ministry of Women Affairs – National Gender Based Violence Dashboard</p>
<b>Land Use Pattern, Agricultural</b>	<p>The estimated land area of Nigeria is 923,768 km<sup>2</sup>. Land use varies based on location and the needs of the community. In 2021, Nigeria had an arable land area of roughly 36.9 million hectares. In addition, 6.6 million hectares were under permanent crops, while 25.2 million hectares were under permanent meadows and pastures. Agriculture</p>

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Social Baseline	
<b>Production and Livelihoods</b>	is a key activity for Nigeria's economy after oil. Major produce in the north are cereals (such as millet, millet), rice, maize, beans, soya beans and vegetables. Irish potato, yam, potato is the main agricultural produce in the middle belt while cassava, cash crops such as cocoa, coffee, cola nuts and cashew nuts are grown in the south-western Nigeria, also, red oil production and cassava are exceptionally produced at the south-eastern region. Sources: <a href="https://www.statista.com">https://www.statista.com</a>
<b>Employment, Economy and Poverty</b>	Estimate from the Nigerian Bureau of statistics (NBS) indicates that unemployment rate in Nigeria surged to 5% in the third quarter of 2023 from 4.2% in the previous quarter, while youth unemployment stands at 8.6%. The Nigerian economy rests on two pillars: oil/gas and agriculture. Both sectors contribute 65% - 70% of GDP, while the secondary sector (manufacturing contributes about 7% and the tertiary sector (transport, trade, housing etc.) contributes about 25%. Source: Nigeria Bureau of Statistics (NBS)
<b>Water Supply and Sanitary Conditions</b>	Poor access to improved water and sanitation in Nigeria remains a major contributing factor to high morbidity and mortality rates among children under 5 years (UNICEF). The use of contaminated drinking water and poor sanitary conditions result in increased vulnerability to water-borne diseases, including diarrhoea which leads to deaths of more than 70,000 children under 5 years annually (UNICEF). 73% of the diarrhoeal and enteric disease burden is associated with poor access to adequate water, sanitation and hygiene, and is disproportionately borne by poorer children. Source: United Nations International Children's Emergency Fund UNICEF

### ES 6: Identified Environmental and Social Risks and Impacts

The positive impacts associated with the RAAMP-SU Implementation include:

- Intervention works will help reduce the risk of erosion and flooding in communities within the corridor of selected sites as a result of proper drainage and culvert construction.
- Rural roads rehabilitation will improve the transportation of agricultural products and commodities to markets, reducing post-harvest losses therefore promoting more efficient and sustainable farming practices.
- Institutional Strengthening - Supporting state Ministries, Departments and Agencies (MDAs), CBOs, NGOs, and Development Partners, etc. in provision of technical assistance guidance and monitoring of road rehabilitation activities undertaken in the project areas, and other parts of the state.
- Encourage direct and indirect investments in the agricultural and rural development sector.
- Improve access to social services including schools, religious areas, healthcare facilities etc.
- Rehabilitation of rural roads will improve transportation infrastructure, making it easier for the locals to commute.
- The proposed intervention works will positively impact women by providing them with easier access to markets, education, and healthcare (where available). This can contribute to women's empowerment and participation in economic and social activities. Additionally, women and children who have to walk across the narrow rugged rural roads to fetch water and wash clothes will have better and safer access to water points due to the intervention works.
- Increase in employment and economic activity is expected to occur during sub-projects implementation.

The adverse E&S risks and impacts associated with Components A & B and the corresponding mitigation measures are presented in the table below. E&S impacts and mitigation measures for pre-rehabilitation and operation phases are included in the report (Chapter 5 and 6)

Rehabilitation/Construction Phase		Mitigation Measures
Environmental Risks	Environmental Impacts	
<ul style="list-style-type: none"> <li>• Air Pollution</li> </ul>	<ul style="list-style-type: none"> <li>• Air Pollution from fugitive dusts and carbon emissions from exhaust fumes during civil works and operation of work vehicles and equipment, respectively</li> </ul>	<p>Measures should be targeted at dampening or watering the road surface using water trucks or sprinkler systems, distributing Personal Protective Equipment (PPEs) such as nose masks or respirators to workers/community members, and reducing emissions by retrofitting with emission controls for vehicles and ensuring that vehicles are serviced regularly.</p> <p>Maintain a speed limit of 40km/hr. on earth-based roads (dirt roads).</p>
<ul style="list-style-type: none"> <li>• Soil Pollution</li> </ul>	<p>Soil Pollution: Leakages from construction wastes such as disused oil (fuel, lubricants), cement, and paint may occur</p>	<p>Measures should be targeted at storing of hazardous materials such as oil, fuel, lubricants, cement, and paint in designated containers.</p>

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Rehabilitation/Construction Phase		Mitigation Measures
		<p>Liaise with the appropriate waste management agency for the proper evacuation and disposal of hazardous waste materials.</p> <p>Use of drip pans.</p> <p>Management of maintenance workshops or onsite maintenance.</p>
<ul style="list-style-type: none"> <li>Noise level increases</li> </ul>	<ul style="list-style-type: none"> <li>Noise level increase during civil works and operation of work vehicles and equipment.</li> </ul>	<p>Early notification of community members on work schedule.</p> <p>Provide project workers, community members (e.g. students, roadside traders, farmers, etc.) with PPEs such as earplugs or earmuffs and Implement noise control measures during construction, such as mufflers or silencers on machinery and <b>fulfils the requirements of ESS 2</b></p> <p>As much as possible, avoid work during late evenings or night hours (between 6:00pm to 6:00am).</p>
<ul style="list-style-type: none"> <li>Energy wastage</li> </ul>	<ul style="list-style-type: none"> <li>Energy wastage due to inefficient or unnecessary consumption of energy resources e.g., diesel, electricity</li> </ul>	<p>Measures should be targeted at ensuring resource efficiency and alternating operations to reduce energy losses</p>
<ul style="list-style-type: none"> <li>Generation of Construction and Demolition (CD) wastes</li> </ul>	<ul style="list-style-type: none"> <li>Significant amounts of wastes will be generated onsite. These wastes may include debris, top soil, disused materials and containers, food wastes etc.</li> </ul>	<p>Measures should be embedded in sub-project level Waste Management Plans (WMPs). Measures should focus on source reduction, sorting, collection, reusing, recycling, transporting, containment, treatment final disposal etc. <b>Fulfils the requirements of ESS 3</b></p> <p>Measures should include plans which address waste collection at source. <b>Fulfils the requirements of ESS 3</b></p>
<ul style="list-style-type: none"> <li>Surface water contamination</li> </ul>	<ul style="list-style-type: none"> <li>Possible pollution of surface water via oil/lubricant spills from machinery, batteries acid etc.</li> <li>Construction of river crossings may result in sediment runoffs in nearby streams/rivers</li> </ul>	<p>Measures should be targeted at implementing spill prevention and containment.</p>
<ul style="list-style-type: none"> <li>Impacts on Natural Habitats</li> </ul>	<ul style="list-style-type: none"> <li>Possible disruption of local habitats and wildlife during excavation</li> </ul>	<p>Mitigation measures should be targeted at conducting thorough habitat surveys prior to excavation activities to identify sensitive areas and wildlife habitats.</p> <p>Establish buffer zones around sensitive habitats to prevent direct disturbance. Furthermore, these zones should be marked clearly to restrict access to them during road rehabilitation.</p> <p>For excavations around borrow pits, ensure that all open pits are reclaimed to the normal topography of the land, the reclamation should be followed by reforestation/ replanting with native vegetation.</p>

Rehabilitation/Construction Phase		Mitigation Measures
Social Risks	Social Impacts	
<ul style="list-style-type: none"> <li>Noise level increases</li> </ul>	<ul style="list-style-type: none"> <li>Residents of communities may experience unusual noise specifically, from civil works and use of heavy machineries.</li> </ul>	<p>Mitigation measures should be targeted at utilizing scheduling movement options to reduce or minimize the impacts of noise disturbances around residential areas/locations.</p>
<ul style="list-style-type: none"> <li>Grievances, Complaints, Disruption of Activities and Vandalism</li> </ul>	<ul style="list-style-type: none"> <li>Grievances from community locals as a result of relocation of structures within the ROW</li> <li>Negative impact on host community dynamics as an outcome from labour influx</li> <li>a. Impact on existing infrastructures which may be accidentally damaged or destroyed during the movement of heavy-duty vehicles and equipment</li> </ul>	<p>Implement Grievance Redress Mechanism (GRM) at the level of the sub-project</p> <p>Early and continuous Stakeholder Engagement is mandatory and <b>fulfils the requirements of ESS 10</b></p> <p>Implement a Resettlement Action Plan (RAP) or Abbreviated Resettlement Action Plan (ARAP)</p>
<ul style="list-style-type: none"> <li>Grievance and Conflicts</li> </ul>	<ul style="list-style-type: none"> <li>Grievances may arise due to activities around sacred sites</li> </ul>	<p>Implement Physical Cultural Resources Management Plan and or a Chance Find Procedure</p>
<ul style="list-style-type: none"> <li>Risk of violent or non-violent conflicts</li> </ul>	<ul style="list-style-type: none"> <li>Conflicts of interests may arise during decision making at the project implementation level; between Contract workers and general labour, etc. .</li> </ul>	<p>Implement GRM at the level of the sub-project/ intervention works.</p> <p>Stakeholder Engagement</p> <p>Mitigation measures should be implemented through provisions in the Contractors Environmental and Social Management Plan (CESMP).</p>



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		Stakeholder Engagement, Sensitization and capacity building for all cadre of workers should be conducted.  Enforce Code of Conduct (CoC)
<ul style="list-style-type: none"> <li>Risk of Illicit Behaviour and Crime</li> </ul>	<ul style="list-style-type: none"> <li>Theft, physical assaults and substance abuse attributable to labour influx. Additionally, there may be increase in unprotected sexual intercourse due to labour influx thereby increasing the risks of Sexually Transmitted Diseases (STDs) and Sexually Transmitted Infections (STIs).</li> </ul>	Implement Labour Management Procedure (LMP)  Awareness and training and  Enforcement of the CoC cadres.
<ul style="list-style-type: none"> <li>Risk of social conflicts</li> <li>Risk of illicit behaviour</li> <li>Security risks and threats</li> </ul>	Labour influx may lead to: <ul style="list-style-type: none"> <li>Risk of social conflicts between local community and the construction workers</li> <li>Risk of illicit behaviour and practices e.g., substance abuse which may also be on the increase following the influx of migrant contractor workers across project locations.</li> <li>Contracted workers such as Contractors may be exposed to security threats such as vandalization and destruction of their assets and possibly kidnapping.</li> </ul>	Implement LMP; training and enforcement of the CoC cadres  Conduct Security Risk Assessment (SRA) prior to commencement of civil works and implement SMP during the project life cycle. Contractors should include their own security measures and plans in the CESMP
<ul style="list-style-type: none"> <li>SEA/SH and VAC (GBV)</li> </ul>	<ul style="list-style-type: none"> <li>Women and girls may be exposed to Sexual Harassment (SH)/Sexual Exploitation and Abuse (SEA) as a result of interactions with workers and possibly followers.</li> </ul>	Gender Based Violence (GBV) risk assessment and mapping of GBV services; Align with Project GBV mitigation Plan  Sensitization campaigns and awareness against SEA/SH/GBV
<ul style="list-style-type: none"> <li>Child Safety</li> </ul>	<ul style="list-style-type: none"> <li>Children may be exposed to various forms of violence from workers.</li> </ul>	Enforcement of all Cadres of CoCs etc
<ul style="list-style-type: none"> <li>Exposure to accidents</li> </ul>	<ul style="list-style-type: none"> <li>Unreclaimed and abandoned borrow pits may pose safety risks for children and other persons in communities.</li> <li>Likely accidents while pedestrians are crossing access roads.</li> </ul>	Applications of suitable measures that <b>fulfil the requirements of ESS 4</b> e.g., Community Health and Safety Plan  Preparation of Borrow Pit Management and Reclamation Plan  Preparation of Traffic Management Plan (TMP)
<ul style="list-style-type: none"> <li>Security risks and threats</li> </ul>	<ul style="list-style-type: none"> <li>Communities already exposed to security risks and threats may experience heightened security threats due to ongoing intervention works. E.g., kidnapping. Similarly, communities void of security risks and threats may suffer such when sub-projects commence.</li> </ul>	Mitigation measures should be targeted at conducting SRA prior to commencement of civil works and implement Security Management Plan (SMP) during the project life cycle
<ul style="list-style-type: none"> <li>Restricted access along project locations</li> </ul>	<ul style="list-style-type: none"> <li>Road users may suffer restricted access to selected roads when intervention works are ongoing</li> </ul>	Early notification and sensitization of community members (e.g. students, roadside traders, farmers, etc.)
<ul style="list-style-type: none"> <li>Physical and Economic Displacement</li> </ul>	<ul style="list-style-type: none"> <li>Implementation of civil works may result to reclamation of the Right-of-Way (ROW) and impact on livelihoods.</li> </ul>	Implement RAP or ARAP
<b>Occupational Risks</b>	<b>Occupational Impacts</b>	
OHS Risks	Most activities could predispose personnel to hazards. " <b>Unsafe behaviours</b> " and " <b>Unsafe conditions</b> " will pose a serious Occupational Health and Safety (OHS) risk.	Measures should apply the "Hierarchy of Controls" according to OHS principles – Elimination, Substitutions, Engineering Controls, Administrative Controls and PPEs.

## ES 7: Guidance on Environmental and Social Assessment

In fulfilment of the requirements of the Nigeria EIA Act CAP E12. LFN 2004 and ESS 1, the RAAMP-SU will prepare environmental and social assessments for subprojects/intervention works envisaged to have potential adverse environmental and social risks and impacts. The assessment to be carried out should be proportionate to the potential risks and impacts of the intervention works, and will assess, in an integrated way, all relevant direct, indirect and cumulative environmental and social risks and impacts associated with **Component A; Sub-Component A.1 (Rehabilitation/Upgrade of about 3,000 km of rural roads, repairing, and strengthening of old bridges and culverts, slope stabilization, erosion protection improvements, surface repairs or**

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**resurfacing and other engineering solutions, and Component B; Sub-Component B.1 (Civil works relating to maintenance of 3,500 km of rural roads).**

**Environmental and Social Screening** - Similar to the ESF, the Environmental Assessment Department of the Federal Ministry of Environment mandates that a review of all proposed investment projects or sub-projects be undertaken through a process called an initial environmental examination (Screening). The purpose of the screening is to categorize projects or sub-projects based on propensity/likelihood to result in potential adverse environmental and social risks and impacts, and identify the level of environmental assessment required. In this regard, screening for sub-projects/intervention works under the RAAMP-SU shall be in accordance with the Nigeria EIA Procedures (2021), and the requirements of ESS 1. The Screening will be undertaken primarily by the RAAMP-SU SPIUs under the guidance of the FPMU. The significant environmental and social risks and impacts/areas of concern shall be captured in the Environmental Screening and Scoping Report, and a Terms of Reference (ToR) shall be prepared for the E&S Assessment for the proposed intervention work(s).

## ES 8: Institutional Arrangements for Implementation of the RAAMP-SU ESMF

The institutional arrangements, Roles and Responsibilities for the RAAMP-SU Implementation is presented below

S/N	Organizations	ESMF Roles and Responsibilities
<b>Governmental Organizations</b>		
1.	Federal Ministry of Environment (FMEEnv)	The FMEEnv shall provide the guidelines and procedures required for in-country disclosure of the ESMF and subsequent E&S assessments to be prepared at the state levels through its EA Department. Currently, the EA department has provided supporting staff to the RAAMP-SU FPMU who in addition help bring the integration of the country's E&S framework (where and when necessary) in RAAMP-SU implementation. The FMEEnv will also aid the RAAMP-SU FPMU in coordinating with its departments and agencies on monitoring responsibilities as regards this ESMF and other program instruments where required. Currently, the FPMU has environmental officers seconded from the FMEEnv to support the project, and this structure will be adopted for the RAAMP-SU.
2.	Federal Ministry of Agricultural and Food Security (FMAFS)	The FMAFS is the implementing ministry and shall coordinate and liaise directly with the FDRD on ESMF implementation matters. In addition, it will speed up coordination activities (where required) with other federal ministries involved in ESMF implementation so as to facilitate information sharing, strategizing, and shall report ESMF and overall RAAMP-SU implementation to the Federal Executive Council (FEC).
3.	Federal Department of Rural Development (FDRD)	The FDRD is the department overseeing the affairs of the RAAMP-SU on behalf of the FMAFS. The Federal Project Steering Committee is domiciled in this department and will support project decisions at the ministerial level.
4.	Federal Ministry of Labour and Employment (FMLE)	The FMLE is the federal ministry concerned with relations between workers and employers. It will exercise responsibility in ESMF implementation by ensuring implementation activities especially those involving workers are consistent with the provision of the National Policy on Labour (1999), the RAAMP-SU LMP and support the safeguards unit of the FPMU in assuring the requirements of ESS 2 are in keeping throughout project implementation. The FMLE will as well support labour and OHS compliance at the state levels through its 36 labour offices including the labour office in the FCT. The Department for OHS of the ministry will act principally on the ministry's behalf.
5.	Federal Ministry of Women Affairs (FMWA)	The FMWA was created consequent upon the response to The United Nations agreement to establish Institutional Mechanisms for advancing Women and Women matters. Specifically, the FMWA through its Department for Women and Gender Affairs will support ESMF implementation through mainstreaming its women and gender affairs approach with the GBV action plan for RAAMP-SU and the Bank's Good Practice Note - Addressing SEA/SH in Human Development Operations. Currently, the FMWA has seconded an officer to support the RAAMP FPMU.
6.	State Ministry of Women Affairs (SMWA)	Depending on their mandate they shall assist ESMF implementation on gender issues and in the mapping of GBV services. Additionally, partner with the SPIUs in sensitization and awareness campaigns and grassroots programs/initiatives targeted at women inclusion and development. Currently, many of the SPIUs have gender officers seconded from the SMWA to support the project, this model will be adopted for the RAAMP-SU states.
7.	Federal Project Management Unit (FPMU)	Serve as the central coordinating body for the implementation of the ESMF across all RAAMP-SU states. Develop and disseminate guidance materials, templates, and training programs to support SPIUs in implementing the requirements of the ESSs relevant to RAAMP-SU. Monitor and evaluate the performance of SPIUs in complying with environmental and social standards and requirements. Facilitate knowledge sharing and exchange of best practices among SPIUs to enhance

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S/N	Organizations	ESMF Roles and Responsibilities
		Implementation. Coordinate RAAMP-SU GRM implementation, GBV Action Plan, project Security Management Plan (SMP), etc.
8.	State Project Implementation Units (SPIUs)	Implement the ESMF at the state level, ensuring that the requirements of the relevant ESSs are integrated into all RAAMP-SU subprojects. Conduct environmental and social assessments and prepare necessary E&S instruments, such as Environmental and Social Management Plans (ESMPs) and Resettlement Action Plans (RAPs) etc. Provide training and capacity building to SPIU staff and stakeholders on the ESF, the relevant ESSs to RAAMP-SU, E&S compliance requirements, etc. Establish and maintain Grievance Redress Mechanisms including SEA/SH GRM, to address community concerns related to environmental and social risks and impacts of subproject activities. States shall also conduct SRA and implement their SMPs as part of ESMF implementation.
9.	Safeguards Units	Safeguards units in the FPMU and SPIUs consist of environmental, social and GBV officers and shall take lead in assuring that sub-projects/intervention works designed and implemented by RAAMP-SU are in keeping with the requirements of the ESSs. They shall ensure that E&S assessments prepared by Consultants' meet the Banks's requirements and play a role in liaisons with the SMEnvs/FMEnv in registering sub-projects/intervention works and seeing to their disclosure. Importantly, SPIUs shall conduct E&S screening of subprojects and shall prepare screening reports and TORs for E&S assessments; which shall be reviewed by the FPMU Safeguards Unit and cleared by the Bank. All Safeguard responsibilities summarised in numbers 7&8 of this Table shall be driven by the Safeguards Unit.
10.	National Emergency Management Agency (NEMA)/States Emergency Management Agency (SEMAs)	NEMA shall provide supportive coordinating responsibilities to the FDRD/FPMU in the event of emergencies and natural disasters; while the State Emergency Management Agency (SEMA) shall provide same at state levels. NEMA shall collaborate with RAAMP-SU in aligning its approaches in the National Disaster Management Framework with the requirements of ESS 4 (WB Guidance Notes on Community Health and Safety - Emergency Preparedness and Response), where applicable. NEMA and the SEMAs will support ESMF implementation through Emergency Preparedness and Response approaches.
11.	States Ministry of Environment (SMEnvs)	The SMEnvs shall exercise the power of the FMEnv at the level of the states such that in ESMF implementation they will provide the E&S policy framework to guide RAAMP-SU civil works implementation. In addition, SMEnvs shall participate in project consultations, disclosure of cleared E&S instruments and monitoring of ESMF implementation at the state levels.
12.	State Environmental Protection Agencies/State Waste Management Agencies (SEPAs/SWMAs)	The SEPAs shall enforce environmental regulatory compliance at the state levels respectively. Statutorily, they are mainly responsible for ensuring the overall protection of various aspects of the built, physical and biological environment by ensuring limits set by the FMEnv are not exceeded during development works. The SEPAs may be directly involved in waste management activities, however, in some states the responsibility for waste management is handled by the SWMAs. Generally, at the state level, the SWMAs undertake the task of providing guidelines for enforcing proper waste management procedures. In some instances, the SWMAs may have designated dumpsites for specific types of waste and guide the process for waste conveyance to the dumpsites by waste generators or procure the services of licensed waste collection vendors to carry out the services of waste collection, treatment and final disposal. SPIUs shall leverage on the relationships with SWMAs to assure that environmentally sound and socially accountable management of waste is a primary requirement during the implementation of civil works.
13.	Rural Access Road Agencies (RARAs)	The state RARAs will be very effective in the operation phase of the implementation of this ESMF by carrying out road maintenance across the RAAMP-SU states.
14.	Other Interested Parties	Stakeholder identification for technical support MDAs shall be a continuous process in the implementation of the ESMF as well as during the preparation of requisite E&S instruments. In this regard, other interested parties may be identified and found to be relevant for ESMF implementation as further stakeholder engagement continues either at the federal or state levels. Such parties based on their statutory mandate shall be assigned appropriate responsibilities depending on their relevance to aspects of ESMF implementation i.e. Physical Cultural Resources, Biodiversity etc.
<b>Non-Governmental Organizations</b>		
1	Consultants	Consultant(s) will be procured by the FPMU and SPIUs to undertake the preparation of required E&S instruments; and/or other requisite reports (if needed). They will liaise with the E&S Technical Assistance (TAs) Consultants and E&S Officers of the FPMU and SPIUs respectively. Consultants may also be required to conduct capacity building on ESMF implementation and/or implementation of management plans described in E&S instruments.
2	Contractors	Contractors shall abide by all environmental and social clauses established in the bidding documents and contract agreements. They shall sign and implement the Code of Conduct and comply to their mitigation responsibilities for E&S risks and impacts as provided in the E&S assessments (e.g. ESMPs) including their respective CESMPs. In order to enable successful

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S/N	Organizations	ESMF Roles and Responsibilities
		Implementation of the ESMF including provisions furnished in disclosed E&S assessments. Contractors shall include E&S and GBV focal persons as part of their work force and an OHS/Community, Health, Safety, Environment and Security officer or manager. Additionally, Contractors shall comply to the LMP provisions to drive ESMF implementation.
3	Supervisory Consultants	Supervisory Consultants shall be responsible to monitor, keep in check, ensure quality assurance and optimal delivery of the Contractors contract. Their E&S responsibilities will require monitoring mitigation measures ascribed to Contractors, review of the CESMP, verification of signed CoCs etc. They shall also form parts of the actors required to implement and monitor some of the management plans captured in this ESMF. Similar to Contractors, Supervisory Consultants shall include E&S and GBV focal persons as part of their work force; as well as an OHS/Community, Health, Safety, Environment and Security officer or manager.
4	Civil Society Organizations (CSOs), Non-Governmental Organizations (NGOs), Community Based Organizations (CBOs) and Other Interested Parties.	At national level and sub-national levels when properly engaged by the project (through stakeholder engagements and consultations), CSOs, NGOs and CBOs could drive sensitization and awareness programs on rural development, labour influx, community health and safety, SEA/SHGBV, etc.
5	The World Bank	The World Bank has overall responsibility to ensure that its ESF and ESSs are complied with. In addition, the Bank will be responsible for the final review and clearance of ESMF; as well as the giving of a "no objection" to the Terms of Reference for E&S instruments (ESMPs, ESIA, GAP, RPF, RAPs, LMPs, SRAs, SMPs, etc.).

### ES 9: Stakeholder Engagement

Consultations for the ESMF involved a combination of virtual meetings and physical consultations, taking into account the “**Public Consultations and Stakeholder Engagement in WB-supported Operations when there are Constraints on Conducting Public Meetings**” (such as insecurities in some of the states). The consultations were held from 20<sup>th</sup> March – 2<sup>nd</sup> April, 2024. The consultation and public engagement process for developing the ESMF included stakeholders such as the Federal Project Management Unit (FPMU), State Project Implementation Units (SPIUs), Rural Access and Road Agencies (RARAs), Federal and State-Level Implementing MDAs (Federal Ministry of Environment/State Ministry of Environment (FMEnv/SMEnv), Federal Ministry of Labour and Employment (FMLE), State Ministries of Land, State Ministries of Work, State Ministries of Women Affairs, State Environmental Protection Agencies/State Waste Management Agencies (SEPA/SWMA), State Emergency Management Agencies (SEMA)), both at the existing and new states, Local Communities, and Road Users. A summary of key concerns, suggestions discussions is provided below:

- **FMEnv** - Updates on relevant regulatory frameworks were shared. The Deputy Director of the Department of Environmental Assessment confirmed changes in Nigeria's EIA procedures and charges as of 2021. Notably, adjustments were made to charges for screening, scoping, and registration of environmental social assessment as contained in the EIA Procedures and Charges Regulation 2021.
- **SPIUs** - Consultations were held with the SPIUs of the RAAMP-SU Prospective States (where available) and it was observed that most of the states already have a functional SPIU under RAAMP and the SPIUs have acquired various levels of competencies for management of environmental, social and GBV risks, however, some SPIUs are yet to set up project offices and procure office equipment.
- **RARAs** - Consultations with the SPIUs further revealed that while some states (Adamawa, Akwa Ibom, Bauchi, Ekiti, Jigawa, Kaduna, Kano, Kebbi, Kogi, Niger, Ogun, Ondo, Oyo, and Plateau states) have passed the bill to establish RARA, they are still awaiting their inauguration. In states where the RARAs have not been established, there are variations in their structure and function, with some states having separate agencies like the Road Maintenance Agency (Anambra) and Road Traffic Agency (Kano). The agencies have been established to take ownership of road rehabilitation projects in the states.
- **NEMA** - The consultation with NEMA revealed that while there are standard procedures for accidents and emergency management, there is no specific protocol tailored to the road construction sector. However, they expressed their optimism for the RAAMP-SU and informed of their readiness to support its successful implementation. Furthermore, they solicited that the RAAMP-SU maintain an open channel of communication and continuously engage them whenever they require their services.



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- **SEPA/SWMA**s – The consultation with SMWAs revealed that, while there are waste management frameworks in place in all states, these frameworks do not adequately cover waste management in rural communities. Each state has its waste management agency, with varying practices such as incineration and landfill use.
- **State Ministries of Works** – Stated that the objectives and components of RAAMP-SU align with some of their functions and voiced their willingness to partake in the implementation of the project. Some states have Area Engineers who represent the ministry at the local level. These engineers specialize in rural roads and have extensive knowledge of their respective LGAs, particularly roads that are in poor condition and near major farms. Utilizing their expertise, they could play a valuable role in the road selection process by offering insights on roads that are very important to local communities. The ministry representatives emphasized the need for continuous engagement and inclusion of their ministry in all phases of RAAMP-SU.
- **Communities** – Stakeholders have raised concerns about their exclusion from the decision-making process regarding the selection of sub-projects or intervention works within their communities during past projects. This absence of involvement has led to the development of rural road infrastructure that fails to address the specific needs of certain communities, especially when compared to other roads. Additionally, community members have noted that access roads leading to project sites, such as those for culvert and bridge installations, are often in poor condition and inaccessible. Despite this, these access roads are overlooked and not given priority for rehabilitation.

*Refer to Chapter 9 for more details on Stakeholder Consultation.*

### ES 12: ESMF Cost Estimate

The total estimated cost for the ESMF implementation and monitoring for all project locations is estimated at **One Million, Six Hundred and Eleven Thousand, One Hundred and Seventy-One Dollars, Sixty Cents Only (USD 1,611,171.60)**. This is equivalent to **One Billion, Eight Hundred and Thirteen Million, Eight-Three Thousand and Three Hundred Naira Only (1,813,083,300.00 NGN)**.

# CHAPTER 1 – INTRODUCTION

## 1.1 Background Information

The Federal Government of Nigeria (FGN) has requested the World Bank (WB) to increase the number of states participating in the current Nigeria Rural Access and Agricultural Marketing Project (RAAMP). Presently, there are 19 pioneer participating states under RAAMP, however the next phase of the RAAMP program, which will be the Rural Access and Agricultural Marketing Project – Scale Up (RAAMP-SU) will be open to all states in Nigeria (36 states including the Federal Capital Territory (FCT)). The project will be guided by the Government's Rural Travel and Transport Program (RTTP). The lead implementing agency is the Federal Department of Rural Development (FDRD) of the Federal Ministry of Agriculture and Food Security (FMAFS). The Federal Project Management Unit (FPMU) which is currently overseeing RAAMP will direct and coordinate the affairs of the RAAMP-SU on behalf of FDRD, while the state governments of the prospective states will implement the RAAMP-SU through State Project Implementation Units (SPIUs). The Project Development Objective (PDO) of RAAMP-SU is to improve rural access while strengthening the financing and institutional framework for a sustainable rural road network in prospective States. The RAAMP Scale-Up will focus on connecting rural communities to local agricultural markets such as roadside agro-logistics hubs, social amenities such as schools and hospitals, introduce an innovative approach of Green Roads for Water into the project design to enhance the resilience of the project as well as promote social cohesion at rural level. The RAAMP-SU will fund other states that meet the criteria to join the project. The Scale-Up would emphasize institutional strengthening such as operationalizing the Rural Access Road Agency (RARA)<sup>1</sup>, State Road Fund (SRF), Road Asset Management System<sup>2</sup>, Green Rural Transport Strategy, Road Safety Management, digitalized outcome monitoring, skill development for management of rural roads as well as gender targeted opportunities. State roads that close the connectivity loop will also be included on the Scale-Up project.

## 1.2 Purpose of the ESMF

The purpose or overall objective of this Environmental and Social Management Framework (ESMF) is to revise/update and adopt the existing RAAMP ESMF which was prepared in 2018 for the parent project, to guide Environmental and Social (E&S) management under the RAAMP-SU. The updated framework provides guidelines for assessing the environmental, socio-economic, and health risks and impacts of the project as well as recommending appropriate generic mitigation measures and monitoring plans in line with the requirements of relevant Environmental and Social Standards (ESSs) of the World Bank (WB) Environmental and Social Framework (ESF). It contains generic mitigation measures and plans to enhance positive outcomes and reduce, offset adverse risks and impacts. Once subprojects sites are identified and the necessary planning information is made available, site-specific screening will be conducted and risk and impact mitigation measures proportional to risks and impacts shall be considered. The updated ESMF shall also provide provisional budgeting, cost estimation, and information on the agency or agencies responsible for addressing project risks and impacts, including capacity of these institutions/agencies to manage environmental and social risks and impacts. With the overall objective of updating the existing RAAMP ESMF, the specific objectives of the ESMF are to update:

- The inventory of likely potential environmental and social risks and impacts that may arise when the RAAMP-SU subprojects' locations are determined;
- Roles and responsibilities of stakeholders to be involved in the identification and implementation of E&S risks and impacts mitigation measures;
- Subproject screening procedures as well as forms, guidance, and checklists to assist in generating and providing E&S technical inputs to subprojects;
- Existing screening procedure for identifying the environmental and social risks and impacts associated with the SU subprojects;
- Existing TORs for preparing ESF/safeguards instruments (such as ESIA/ESMPs);

<sup>1</sup> The Rural Access and Road Agency (RARA) is charged with the responsibility of ensuring the overall management, design, development, rehabilitation, reconstruction and maintenance of rural roads in the states.

<sup>2</sup> A Road Asset Management System (RAMS) is a system that is used to collect, manage and analyse road data for road planning and programming purposes<sup>123</sup>. It aims to maximize the value of the road infrastructure from available funds. It uses engineering principles, sound business practice and economic rationale to provide tools for making decisions about maintaining, upgrading and operating road assets.

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- Existing E&S capacity assessment of the project implementation entities including their capacity to screen subprojects and monitor the implementation ESF instruments within the context of the relevant ESS' objectives and requirements and make proposals for capacity enhancement intervention proportional to the risk of the project;
- The budget requirement for mitigation of E&S risks and impacts - keeping in mind price inflation and exchange rate differentials;
- Existing public consultation plan to an outline of a stakeholder engagement plan;
- And define environmental and social standards performance indicators.

### 1.3 Sectoral Background (A Brief)

Nigeria's total road network consists of about 198,000km of roads, including 34,120km of federal roads, 34,300km of state roads and 129,580km of registered rural roads (**Measuring Rural Access: Update 2017/18 – World Bank**). This translates into 21.7km per 100km<sup>2</sup> of land area, which is favourably comparable to other large countries in Africa (e.g., 10km per 100km<sup>2</sup> in Ethiopia and 9.8km in Tanzania). The vast majority of the road network is considered to be in poor condition. It is only estimated that 10 to 15% of the total network is paved. Only about 15% of the federal network is estimated to be in good to fair condition.

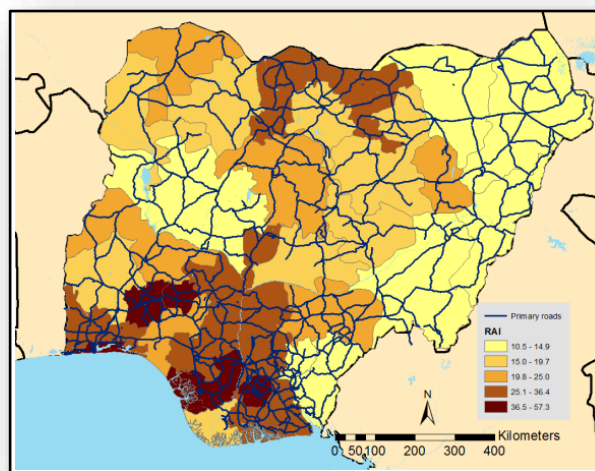


Figure 1: Map showing the Rural Access Index (RAI) across Nigeria – Source: World Bank

Out of the country's 160,000km (approx.) of state and rural roads, less than 10 – 15% are likely to be in good to fair condition. The Rural Access Index (RAI) is estimated at 25.5% in Nigeria (See Figure 1 above). It is estimated that about 92.5 million rural people do not have good access to the road network in the country. There is significant variation in rural accessibility across states: Southern states tend to have relatively high accessibility, such as Lagos (49.7%), Imo (48.3%) and Delta State (41.0%). The northeastern region is lagging behind (e.g., 10.5% in Taraba, 12.8% Adamawa and 13.7% in Yobe State). See Table 1 below for the overview of Nigeria road network.

Table 1: Overview of Nigeria Road Network

Basic Data	
Population <sup>3</sup>	223,804,632 (2023)
Land area <sup>4</sup>	923,768 km <sup>2</sup>
Population density <sup>1</sup>	234.3 per km <sup>2</sup> (2021)
Length of road <sup>5</sup>	198,000km (2022)
Pave road <sup>6</sup>	60,000 km (2021)
Length of road (GIS) <sup>3</sup>	107,794km (2014)
Of which, "good quality road"	26,219 (2014)
Of which, road quality data are missing	0km (2014)
RAI <sup>3</sup>	25.5% (2014)

<sup>3</sup> Source: World Development Indicators

<sup>4</sup> Source: Wikipedia

<sup>5</sup> Source: Nigeria Government – Daily Trust

<sup>6</sup> Source: National Development Plan (NDP 2021 – 2025)

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### 1.4 Rationale for the RAAMP-SU ESMF

In 2018, the RAAMP prepared an ESMF for the parent project which covered 13 states. However, the ESMF was prepared based on the World Bank's Operational Safeguards Policies. The new RAAMP-SU has been appraised by the Bank and developed based on the World Bank's Environmental and Social Framework (ESF). This therefore requires an update of the ESMF to reflect the provisions of the ESF, especially in the context of the Environmental and Social Standards (ESSs) and the World Bank's Environmental, Health and Safety Guidelines (EHSGs) relevant to the RAAMP-SU.

The rationale for preparing this ESMF is to assist FDRD in examining the environmental and social risks and impacts of the RAAMP-SU. It guides the FDRD to assess potential environmental and social risks and impacts of the SU's interventions when subprojects' locations cannot be determined during project preparation. It sets out the principles, rules, guidelines, and procedures to assess the potential environmental and social (E&S) risks and impacts. It provides adequate information on the area in which subprojects are expected to be sited, including any potential E&S vulnerabilities of the area; and on the potential impacts that may occur and mitigation measures that might be expected to be used.

RAAMP-SU activities have the potential to generate environmental and social risks and impacts. Potential risks and impacts on the environmental side include noise and dust generation, delay in travel time due to traffic obstruction, accident risks to road users, and potential pollution to water resources from poor waste management, while on the social side community health & safety risks such as accidents/spread of STDs, risks of GBV/SEA/SH, disruption of social amenities like electric power poles, potential labour influx, minor agricultural land take, impacts on assets and access to assets, disruption of agricultural activities, relocation of shrines, likely exclusion of vulnerable people from consultations and project benefits and, potential difficulties to reach out affected communities as a result of security challenges are the likely social risks and impacts that need to be addressed. Essentially, this ESMF demonstrates through the ESF's mitigation hierarchy<sup>7</sup>; suitable, practicable, cost effective and efficient mitigation measures required to manage the envisaged potential adverse environmental and social risks and impacts. These are presented in a generic Environmental and Social Management Plan (ESMP) which provides guidance to SPIUs when carrying out their own environmental and social assessment (with exact knowledge of the site location, project design, scale, etc.) so as to prepare ESMPs which address site specific E&S risks and impacts.

### 1.5 Approach and Methodology of the ESMF

This ESMF has been prepared in accordance with standard procedures for environmental and social assessment including World Bank Environmental and Social Standards (ESSs), other relevant international environmental and social assessment regulations and guidelines, and the Nigerian environmental assessment guidelines. The technical approach and methodology adopted for the study include:

- Kick-off meeting and consultation with the FPMU
- Review of requisite documents – RAAMP-SU Concept Note, ESMFs for the parent project (RAAMP) and former Rural Access and Mobility Project (RAMP) & Rural Access and Mobility Project Phase 2 (RAMP2), RAAMP GBV Mapping Reports, RAAMP Grievance Redress Mechanism (GRM), Security Risk Assessment, etc. as well as the applicable World Bank ESSs, Nigeria Environmental Laws, policies and regulatory frameworks, Guidance Note for ESSs – ESS 1-6; 8&10, Good Practice Notes (GPN) - Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Human Development Operations, World Bank Group EHSGs etc.
- Initial stakeholder identification and mapping (mainly interested parties such as Environmental Assessment (EA) Department of the FMEEnv, Federal Ministry of Women Affairs, Abuja Environmental Protection Board (AEPB), Federal Ministry of Labour and Employment, State Ministries of Women Affairs, State Ministries of Environment (SMEEnv), etc.).
- Field Visits to some existing RAAMP SPIUs and roads with ongoing civil works
- Development of stakeholder engagement questionnaire for SPIUs, Federal and State MDAs to assess institutional capacity, acquire requisite documentation and information relevant for the preparation of the ESMF.

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<sup>7</sup> Avoidance, Reduction, Mitigation, Compensation.



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- Consultations with relevant MDAs at the Federal and State level through site visits and virtual meetings
- Stakeholder engagement with project communities
- Biophysical and socioeconomic baseline studies
- Identification of potential E&S risks and impacts, and mitigation measures.
- Preparation of a capacity building plan to strengthen the capacity of institutions that will support the RAAMP-SU.

**NB: Revision/Modification of the ESMF** - The ESMF will be a 'live document' enabling revision, when and where necessary. Any unexpected situations and/or relevant changes in the design would be assessed and appropriate management measures would be incorporated by updating the ESMF. Revisions will require the Non-Objection from the World Bank.

### 1.6 Structure of the ESMF

Executive Summary

Chapter 1: Introduction

Chapter 2: Project Description

Chapter 3: Legal, Regulatory and Administrative Framework

Chapter 4: Environmental and Social Baseline

Chapter 5: Potential Key Environmental and Social Risks and Impacts

Chapter 6: Environmental and Social Management Procedures

Chapter 7: Environmental, Social, and Health & Safety Capacity Assessment

Chapter 8: Institutional Framework

Chapter 9: Stakeholder Engagement and Disclosure

Chapter 10: Conclusion and Recommendations

Annex 1: Terms of reference (ToR)

Annex 2: RAAMP-SU Sample Environmental and Social Screening Checklist

Annex 3: Terms of Reference (ToR) of the ESIA Study & Structure of the ESIA Report

Annex 4: Guidance for Drafting a Security Management Plan

Annex 5: Emergency Response Plan during Projects/Construction

Annex 6: GBV Action Plan

Annex 7: Sample Grievance Redress Mechanism for Sub-Projects Requiring E&S Assessment

Annex 8: Terms of Reference (ToR) of the ESMP Study & Structure of the ESMP Report

Annex 9: General Environmental Management Conditions for Construction Contracts

Annex 10: Excerpts on Good Practice Notes on Community Health and Safety

Annex 11: Sample Accident Investigation Form

Annex 12: Sample Company Code of Conduct Preventing Gender Based Violence and Violence Against Children

Annex 13: Some National Protected Areas and World Heritage Sites in Nigeria Relevant for Consideration During RAAMP-SU Implementation

Annex 14: Sample Occupational Health and Safety (OHS) Management Plan (OHSMP)

Annex 15: Traffic Management Plan

Annex 16 - Borrow Pit Management Plan

Annex 17 - Waste Management Plan

Annex 18 - Minutes of Kick-Off Meeting with the RAAMP-SU FPMU

Annex 19 - RAAMP-SU ESMF Stakeholder Engagement Questionnaire

Annex 20 - Summary of Stakeholder Consultations at the RAAMP-SU Prospective States

Annex 21 - Attendance Sheets from Stakeholder Consultations and Field Visits

Annex 22 - Pictures from Stakeholder Engagement

**Kindly note that Annexes 1-8 have been included in this ESMF report. However, Annexes 9-22 provide secondary guidance documents that may be useful at some point during the project implementation, thus have been included as a link (See Page 230).**

# CHAPTER 2 – PROJECT DESCRIPTION

## 2.1 Description of the RAAMP Project

### 2.1.1 Background to the Conceptualization of RAAMP-SU

In February 2020, the WB Board approved the Rural Access and Agricultural Marketing Project (RAAMP) which was originally designed to cover 13 States; however, 6 additional States joined the project in 2022 upon the request of the GoN. It was disclosed at the mid-term review that the project fund of USD 575 million was inadequate to meet the goals of the project in the 19 beneficiary States. Following the mid-term review, it was concluded that substantial funding will be required to achieve the RAAMP targets and to establish similar programs in other states. Consequently, the GoN requested the Bank to expand the RAAMP's geographic reach to cover the entire 36 States including the FCT so as to make the project nationwide. This inclusion of all 36 states and the FCT has therefore required a scale-up of the parent project. The Scale-up (RAAMP-SU) is to provide for the fund shortfall for activities that emanated under the parent project, deliver on the end-targets of the parent project, expand state participation and leverage other funding sources for capital and maintenance. The scale-up will also incorporate lessons learnt from the implementation challenges faced by the parent project, mainly to: (a) avoid activities fragmentation, (b) reduce the vulnerability of road assets to flooding and (c) enhance their resilience and sustainability. Importantly, the current RAAMP is governed by the old environmental and social operational safeguard policies, while the RAAMP-SU operation will be prepared under the Bank's new ESF.

### 2.1.2 RAAMP-SU Technical and Implementation Overview

The RAAMP-SU will focus on connecting rural communities to: local agricultural markets such as roadside agro-logistics hubs; social amenities such as schools and hospitals; introduce green rural transport; as well as promote social cohesion at rural level. The RAAMP-SU will provide funds to complete planned activities under RAAMP in participating States which could not be implemented due to inflation and currency fluctuation. In addition, the RAAMP-SU will fund other States that meet the criteria to join the project (See subsection 2.1.3 below). The scale-up would emphasize institutional strengthening such as operationalizing the Rural Access Road Agency (RARA), State Road Fund (SRF), Road Asset Management System, Green rural transport Strategy, Road Safety Management, digitalized outcome monitoring, skill development for management of rural roads as well as gender-targeted opportunities. State roads that close the connectivity loop will also be included on the Scale-Up project.

### 2.1.3 Criteria for Inclusion of the States in the RAAMP-SU

The RAAMP-SU will expand the project's coverage from 19 States to 36 states including the FCT, which will be subject to the candidate state's commitment to institutional reforms and sustainable financing. Contrary to the criteria for eligibility of the states to participate under RAAMP, which involved the drafting and placement of Road Fund and Roads Agency bills in the State house of assemblies, the RAAMP-SU shall require the States to have a fully functional Roads Fund and Roads Agency with appointed boards and staff, and provision for administrative costs made in the state budget. Additionally, candidate states are expected to have a well-established SPIU office with technically qualified staff required to manage the project. The parent project would provide technical support to new States to establish the SPIUs, including in-house training of staff by the FPMU. Also, SPIUs shall be embedded within the State Rural Access Roads Agency (RARA) in the RAAMP-SU. The RAAMP-SU's funds shall be allocated on a competitive basis between states factoring in: (a) a refined socioeconomic selection matrix to increase rural access to basic services and promote food security; (b) activities readiness in terms of design; and (c) state's demonstrated commitment in the projected infrastructure efficient maintenance, including potential co-financing from their own resources.

## 2.2 Project Development Objectives (PDO)

The RAAMP-SU Project Development Objectives is to improve rural access while strengthening the financing and institutional framework for a sustainable rural road network in prospective states.

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The following key results will measure progress toward achieving the Project Development Objectives in prospective states:

**a) 'Improved Rural Access':**

- People with enhanced access to transport services (million) (CRI).
- Roads rehabilitated incorporating climate resilience measures (km).
- Number of basic social services (schools, health centers) with all season road access (number).

**b) 'Sustainable rural road network'**

- Operational State Rural Access Roads Agency (RARA) with key staff recruited (percentage, disaggregated by gender).
- Operational State Road Fund (SRF) with key staff recruited (percentage, disaggregated by gender).
- Publishing of short-, mid- and long-term maintenance programs using multi-criteria project prioritization tools for transparency, accountability and to institutionalize data driven decisions.

## 2.3 Project Beneficiaries

The main beneficiaries of the project would be rural people living in the project influenced areas, mostly small-holding farmers who rely almost exclusively on agriculture and livestock for subsistence. These include rural farmers, transport operators (both freight and passenger), all buyers and sellers in the agriculture markets, women, children, and persons with physical disabilities who are dependent on rural roads and markets for their daily economic and social activities. They will benefit from the improved and restored year-round access to social, economic, and life-enriching facilities and services as the result of the upgrading and appropriate management of rural road assets. Indirectly, it will help (i) small farmers to reduce post-harvest losses and improve business activities for the small and medium enterprises, (ii) enhance the volume of agricultural products traded and (iii) increase the overall country's food security by facilitating agricultural outputs. In some states, some roads may even directly contribute directly in areas with food shortage.

## 2.4 Project Locations

The RAAMP-SU shall accommodate all 36 states of the Federal Republic of Nigeria including the FCT as long as they meet the selection criteria. In this regard, the ESMF describes the 36 states as "Prospective States". Figure 2 below shows the 36 states and the FCT.

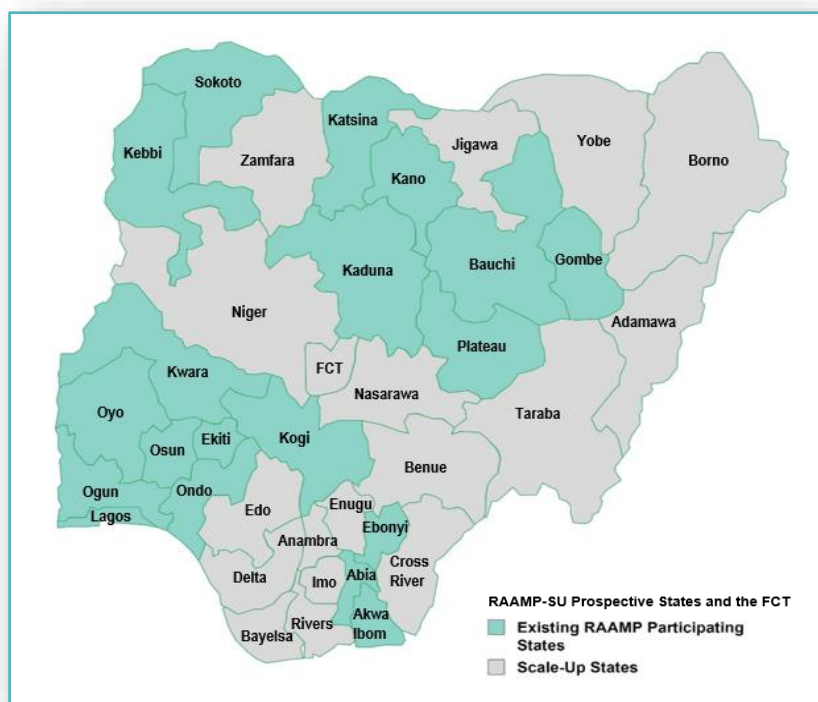


Figure 2: RAAMP-SU Prospective States and the FCT

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### 2.5 Project Components

The Scale-up has been designed to have four (4) components, these are summarized below.

#### Component A: Improvement of Resilient Rural Access

The aim of this component is to improve rural access through the upgrading of rural roads. The component comprises three subcomponents:

- **Sub-Component A.1: *Climate-Informed Rural roads rehabilitation/upgrade***: About 3000 km of rural roads to and from socio-economic community infrastructure will be upgraded by the project. Rehabilitation works will include climate resilience and flood protection measures, such as, repairing, and strengthening of old bridges and culverts, slope stabilization, erosion protection improvements, surface repairs or resurfacing and other engineering solutions. As much as possible, the project will adopt technical consideration facilitating the flow of water from surface and drainage of the main and upstream to rapidly capture flood waters and recycle them into agriculture activities. The project will also explore techniques from the Green Roads for Water approach (See subsection 2.5.2). The envisaged civil works will also focus on local resource-based solutions/materials that are compatible with the local context/conditions.
- **Sub-Component A.2: *Technical support for Rural Roads rehabilitation/upgrade*** required for the successful implementation of subcomponent A.1. including: (a) technical design (including consulting services for incorporating nature-based solutions and “Green Roads for water” approach), environmental and social safeguards instruments, and bidding document for project related activities; (b) monitoring and supervision of the implementation of the civil works, including the Occupational Health and Safety plan (OHS) and Road Safety Management during works as well as the resettlement action plan (RAP).
- **Subcomponent A.3: *Social inclusion and promotion of gender equality*** will be fully integrated as part of the project through: (a) the scale up of the Maternal New-born and Child Emergency Transport Services (MANCETS) initiatives in participating states. Converted three-wheelers into mini ambulances, will be handed to health facilities identified along the roads to be rehabilitated and will contribute to reduction of rural maternal mortality and facilitate access of giving birth mothers to Primary Health Care PHCs centers. The National Emergency Medical Service and Ambulance System (NEMSAS) will support the project in the implementation and monitoring of this activity. (b) The establishment of an apprenticeship program within the RARAs to train young men and women engineers, with a particular focus on gender inclusion. As part of the program, a stipend will be provided to participants complemented by a mandatory rotation within several departments of the institution and mentorship by senior engineers. A non-bidding MOU between the RARAs, several engineering universities and contractors will be signed to facilitate the school to work transition.

#### Component B: Climate Resilient Asset Management

The aim of this component is to carry out climate informed maintenance activities to enhance the resilience of the rural road network, building on sector and institutional reforms established by the parent project, and the enhancement and of established climate resilient road asset management systems NiTRIMS in newly established state road authorities (RARAs). This component comprises of three sub-components:

- **Sub-Component B.1: *Asset Management Improvement and Resilience Scale Up***. This subcomponent will finance: (a) climate risk informed routine and periodic maintenance of 3500 km of rural roads identified through the Annual Road Maintenance system (ARMP) by the established RARA in participating states; (b) technical design, environmental and social safeguards instruments, and bidding document for project related maintenance activities; (c) monitoring and supervision of the implementation of maintenance works.
- **Sub-Component B.2: *Development and implementation of a climate risk informed road asset management system***: This component entails: (a) The revision of road maintenance protocols to integrate climate resilience considerations in rural road maintenance activities (b) The development and integration of a climate risks module in the NiTRIMS system and the compilation and collection of the data required, including the establishment of data collection and compilation protocols, establishment of inter-agency cooperation agreements, and other provisions for continued system updates. (c) The addition of poverty, health, and education data (collected through satellite imagery and other sources of geospatial Big Data) to the NiTRIMS system layered with climate considerations for most climate vulnerable population segments, in road prioritization for rehabilitation and maintenance. (d) Rolling out use of NiTRIMS in all 36 states (building on activities from previous RAAMP phases, and (e) RARAs staff training and strengthening their capacities for adoption of NiTRIMS (with the additional climate and social considerations).

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### Component C: Institutional Strengthening and Project Management

The component comprises of two sub-components:

- **Sub-Component C.1: Project Management** which will support project operating costs, training, project monitoring and impact evaluation activities. It will also cover TA consultancies including support to the Department of Lands under the Agriculture and Food Security to address the resettlement activities systematically. This sub-component will also support project risk mitigation activities including third party monitoring for sexual exploitation and abuse (SEA), gender, Grievance Mechanism (GM).
- **Sub-Component C.2: Institutional Strengthening and sector reforms.** This entails the provision of technical advisory services and capacity strengthening activities, building on previous state-level sector reforms supported in earlier stages of the RAAMP program, as to ensure the sustainability of these institutions. Specifically, it will aim to cover: (a) Continuation of state-level road sector reforms activities, including identification, evaluation, and implementation of measures to improve institutional and financial sustainability of the newly established entities (RARA & SRF) in participating states. (b) TA to develop a climate risk assessment and management framework for the rural road network to inform transport planning and the selection of priority roads for investment (rehabilitation and upgrading). This component will also entail the development and operationalization of a climate risk management plan for rural roads (and served rural communities) at state level and at federal level, for mapping of possibilities of adoption of the “Green roads for water” approach. This subcomponent will also finance RARAs building capacities to conduct local level climate risk assessments as to inform road civil works related to road rehabilitation, upgrading, construction, and maintenance. Provision of TA and training on the revision of procurement protocols to integrate climate risks and resilience considerations in road construction/rehabilitation/upgrading designs, and incorporation of climate risks and resilience considerations in the rural roads asset management system. Support will also entail the development of national guidelines on climate resilient design standards for rural roads, bridges construction, rehabilitation, upgrading/retrofitting, and maintenance as well as the development of climate resilient technical standards. (c) Rural road safety’s institutional strengthening both on Federal and state level. (d) Support for the operationalization of the national rural road directorate (NDRR) to be mandated under the newly established national Agriculture development Fund (NADF), including operational budget, technical support for governance and institutional management, as well as building capacities related to climate risk management and incorporation of climate considerations in decision making.

### Component D: Contingent Emergency Response

**The component will address emergency needs as agreed with the government following an officially declared natural disaster.** This component allows for possible reallocation of uncommitted project financing in the event of a natural disaster. As per standard Bank procedure, a CERC Manual and an Emergency Action Plan would be prepared separately and approved by the Bank, as a disbursement condition for the CERC. If this component is activated, the project will be restructured to reallocate funds, and to revise the PDO, indicators, and implementation arrangements as needed. The CERC activities will be carried out in accordance with the CERC Manual and the Emergency Action Plan.

#### 2.5.1 Technical and Climate Considerations of the RAAMP SU

The RAAMP-SU has been screened for climate change and disaster impacts. Specific potential resilience enhancing measures will be identified and properly reflected in project documents before appraisal. Resilience enhancing measures such as stormwater drainage infrastructure for flood protection as well as cost-effective structural and nature-based adaptation measures that reduce flood and extreme heat risks will be integrated in the project design. This is to ensure that the residual risk to adaptation is low (i.e., acceptable). Furthermore, in line with the RAAMP-SU Component A; Subcomponent A.1 the project will adopt a climate informed rural roads rehabilitation. This will include climate resilience and flood protection measures, e.g. repairing, and strengthening of old bridges and culverts, slope stabilization, erosion protection improvements, surface repairs or resurfacing and other engineering solutions. As much as possible, the project will adopt technical consideration facilitating the flow of water from surface and drainage of the main and upstream to rapidly capture flood waters and recycle them into agriculture activities. The project will also explore techniques from the Green Roads for Water approach. The envisaged civil works will also focus on local resource-based solutions/materials that are compatible with the local context/conditions.



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This ESMF highlights the 1 Climate Impacts and Vulnerability of Project Prospective States and the FCT (See Chapter 4; Subsection 4.2.4.1). In line with the technical and climate considerations for RAAMP-SU implementation such information is useful for assisting the states once they commence development of their subproject designs so as to factor in climate resilience in their planned intervention works.

### 2.5.2 Green Roads for Water Approach

The RAAMP-SU shall integrate the innovative approach of Green Roads for Water into the project design to enhance the resilience of the project as well as improve water conservation and management. This approach is aimed at mitigating the negative impacts of roads on the surrounding landscape thus transforming roads to become instruments of beneficial water management and climate resilience. Green Roads for Water approach consists of a smart integration of water management and road design to yield the following triple benefits: (i) to reduce water-related damage to the roads, (ii) to minimize or even reverse adverse impacts of roads on the surrounding landscape – such as flooding, waterlogging, or land degradation, and (iii) to manage water beneficially – either for the benefit of roadside water users (by improving the sustainability of water resources and/or reducing disaster risks) or through some combination of benefits. This shall be achieved through an early and continuous engagement with locals and stakeholders of project communities to foster inclusiveness and ownership of green road programs that support water resource management and community development. Also, considering that water is the most damaging element for roads (paved or unpaved), the Green Roads for Water approach shall offer basic measures to reduce water damage to roads by guiding water away from road surfaces to locations where it can be used productively or for recharge. This shall be achieved by planning road alignments to avoid long and steep slopes, installing proper drainage systems and well-vegetated buffer zone or stones at the edge of the road. The runoffs from the roads and drainages may also be redirected to farmlands for productive use such as roadside or farm ponds.

### 2.5.3 Guidelines for Road Construction

**1. Roads Prioritization and Selection criteria** - The selection and prioritization of the rural roads to be rehabilitated/upgraded under the project will follow a methodology as described in the following tiered approach:

- a) **State selection (stage 1):** The project will adopt a state selection framework that incentivizes state commitment to institutional reforms, and to bring sustainable counterpart funding to the project. Amongst others, states eligibility will be subject to (i) state creation of operational designated road management agencies (RARAs) and State Road funds (SRFs), and (ii) implementation readiness and provision of state counterpart funding.
- b) **Roads master plan and multi-criteria analysis (stage 2):** For eligible states, based on the needs of the states and their respective rural communities, a long list of candidate rural roads will be elaborated for financing under the project by the states and the Federal Ministry of Agriculture and Food Security (FMAFS). Associated socio-economic and climate vulnerability data along with a local climate risk assessment will be collected for each candidate road to conduct a multi-criteria analysis entailing three main criteria. These criteria and their respective weight (in percentage) are economic (35%), social (25%), and climate vulnerability (40%). Sub-criteria include number of beneficiaries served, projected traffic, average yearly tonnage of agricultural products transported on the road, number of markets and agricultural facilities served by the road, number of basic social services served by the road (PHC, schools, and administrative facilities), climate vulnerability of candidate roads and served areas, and potential reduction in GHG emissions. The highest-ranking candidate roads totaling about 3000 km will be included under the project, where a road safety assessment and appraisal (using WB RSSAT) will be carried out for these highest-ranking roads before selection is finalized.

2. The project will build climate resilience of the road infrastructure, ancillary assets, and of served communities. Through active targeting of roads serving areas with higher vulnerability to climate risks (higher temperatures, droughts, excessive rainfall, etc.), the project will deploy adaptation measures for increased resilience and help adapt to and manage risks related to water scarcity, and agricultural productivity losses in these areas. through providing resilient access and building in physical adaptation components (drainage, food storage, shading, etc.) at local level, as needed. Moreover, as part of the institutional support for rural road management, the project will build capacity in

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conducting climate and disaster risk assessments in RARAs as well as incorporating climate considerations in the decision-making criteria of these entities.

3. The project will integrate road safety considerations to the road design and implementation. The proposed interventions on rural roads (rehabilitation and upgrade) may exacerbate road safety concerns. Without adequate road safety measures, the improvement of the road infrastructures often leads to an increase in average vehicle speeds, thereby heightening the risk of road crashes. To address this imminent challenge, the project will conduct the RSSAT analysis and integrate a comprehensive road safety audit, drawing on methodologies endorsed by international road safety organizations. The road safety audits will identify critical safety measures tailored to the unique rural road conditions in Nigeria. The project aims to prioritize several key safety interventions based on best practices such as adopting effective speed management strategies, including the implementation of speed limits and traffic calming measures, dedicated pedestrian walkways, raised pedestrian crossings, marked facilities for bicyclists and motorcyclists, and the installation of roundabouts at community centers crossed. These measures have been proven to enhance road safety and minimize the risk of road traffic crashes and fatalities.

### 2.5.4 Designs for Road Rehabilitation/Upgrade

The successful completion of the selection criteria and prioritization process will see to the development of engineering designs for proposed intervention works by the states. Currently, only some SPIUs from the 19 states of the parent project have prepared engineering drawings and designs for their proposed intervention works. Under the RAAMP-SU, it is expected that all states prepare engineering drawings and designs for proposed intervention works prior to implementation. These designs shall be useful for any environmental and social assessment to be carried out by the respective states.

**NB: Clearance to kick start the implementation of subprojects/intervention works will be denied unless the requisite E&S assessment for the subproject has been carried out by the RAAMP-SU Prospective States (See Chapter 6, section 6.2.1 on E&S screening process)**

### 2.5.5 Guidelines for Selection of Routine and Periodic Maintenance Roads

1. **The roads to be selected for routine and periodic maintenance will be identified within Annual Road Maintenance Plan (ARMP) generated yearly by the established road asset management tool NiTRIMS.** Nigeria Rural Transport Infrastructure Management System (NiTRIMS) is a comprehensive rural transport management system developed by the parent project RAAMP and implemented in the parent project's nineteen (19) participating states. The system features include: (a) state-wide complete inventory and condition data of rural transport infrastructure; (b) a cost module for automatic estimation of sub-project costs; (c) an investment prioritization module that will prioritize road maintenance and investments using objective criteria –under both limited and unlimited budget constraints; (d) a display module for visual assessment of rural transport infrastructure assets and their conditions using Geographic Information Systems (GIS) visual tools; (e) a contract management module supporting contract management project costs; and (f) the programming of the Annual Road Maintenance Plan (ARMP). The system adopts multi-criteria analysis in investment prioritization and use an operational strategy for selection of interventions.

2. **The project will also support safe access to schools' initiative along the roads to be maintained.** In addition to the incorporation of road safety consideration to the roads under component A, following the International Road Assessment Programme (iRAP<sup>8</sup>) Star Rating, the project will conduct a risk assessment of schools along the roads to be maintained under component B. The objective would be to assess the identified school's risks and bring the iRAP star rating per school to at least 3 stars (where 1 is the least safe and 5 is the safest school) by addressing the problematic areas through physical improvements (speed humps; pedestrian crossings; speed management traffic signs; etc.), which will be accompanied by road safety awareness campaigns for pupils.

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<sup>8</sup> International Road Assessment Programme (iRAP) is a registered charity dedicated to saving lives by eliminating high risk roads throughout the world.

# CHAPTER 3 – LEGAL, REGULATORY AND ADMINISTRATIVE FRAMEWORK

Several laws and regulations apply to the agriculture sector, and specifically to rural development in Nigeria. Thus, several laws, policies, instruments and administrative frameworks are available to support sustainable environmental and social management. a number of legal, regulatory and administrative frameworks are essential to guide policy considerations and decision making in implementation of the project, these include the following:

## 3.1 Review of National Environmental and Social Policy, Legal and Regulatory Frameworks

### 3.1.1 Federal Ministry of Environment (FMEnv) Regulations and Guidelines

The Federal Ministry of Environment is the apex policy making body responsible for addressing environmental issues in Nigeria. To fulfil this mandate, the main instrument in ensuring that environmental and social issues are mainstreamed into development projects is the Environmental Impact Assessment (EIA) Act CAP E12. LFN 2004. With this Act, the FMEnv prohibits public and private sectors from embarking on major prospects or activities without due consideration, at early stages, of environmental and social risks and impacts. The act makes an EIA mandatory for any development project and prescribes the procedures for conducting and reporting EIA studies. As part of the effective utilization of the EIA tool, the Ministry has produced Sectoral Guidelines detailing the necessary requirements of the EIA process for each Sector. One of these Sectoral Guidelines that apply to the proposed project is the 'EIA Procedural Guideline – Agricultural and Rural Development'. Other relevant legal and regulatory frameworks on environment are described in Table 2 below.

**Table 2: Other National Legal and Regulatory Frameworks on Environment**

S/N	Regulations	Year	Provisions
1	National Policy on the Environment	2016	Coordinates environmental protection and natural resources conservation for sustainable development
2	National Environmental Standards and Regulations Enforcement Agency (NESREA Act)	2007	Established to ensure compliance with environmental standards, guidelines and regulations.
3	National Environmental (Ozone Layer Protection) Regulations	2009	Seeks to prohibit the import, manufacture, sale and the use of ozone depleting substances
4.	National Environmental (Sanitation and Wastes Control) Regulations	2009	This regulation makes adequate provisions for waste control and environmental sanitation including punishments in cases of malfeasances.
5	National Environmental (Surface and Groundwater Control) Regulations	2010	The purpose of these regulations is to restore, enhance and preserve purpose. the physical, chemical and biological integrity of the nation's surface waters, and to maintain existing water uses.
6	National Environmental (Soil Erosion and Flood Control) regulations	2011	The overall object of the regulation is to check all earth disturbing activities, practices, development for non-agricultural. Commercial, industrial and residential purposes
7	National Guidelines on Environmental Audit	2011	These are designed to serve as a reference for compliance with the Environmental Audit requirements of the FMEnv. It states that it is mandatory for a company to carry out an audit every 3 years or at the discretion of the Hon. Minister of the FMEnv
8	National Environmental Protection (Management of Solid and Hazardous Wastes) Regulations.	1991	Regulates the collections, treatment and disposal of solid and hazardous wastes from municipal and industrial sources.
9	National Guideline and Standard for Environmental Pollution Control	1991	The regulations provide guidelines for management of pollution control measures.
10	Employee Compensation Act	2010	The Employee Compensation Act is an important piece of legislation passed in order to provide for employees who were injured, disabled, or died during the course of their employment. The Act replaced the Workmen's Compensation Act (1987). The Law was established in order to provide an open and fair system of guaranteed and adequate compensation for employees or their

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S/N	Regulations	Year	Provisions
			dependents for any death, injury, disease or disability arising out of or in the course of employment. The Law is applicable to all employers and employees in the public and private sectors throughout the Federal Republic of Nigeria.
11	Urban and Regional Planning Decree No. 88	1992	Planned development of urban areas (to include and manage waste sites)
12	National Environmental (Hazardous Chemicals and Pesticides Regulations)	2014	The objective of the regulation is to protect human health and the environment from the hazardous effects of chemicals and pesticides.
13	Public Health Law	2014	Covering public health matters
14	National Guidelines on Environmental Management Systems (EMS)	1999	Recognizes the value of EMS to EIA and sets out objectives and guideline on general scope and content of an EMS
15	National Guidelines and Standards for Water Quality	1999	It deals with the quality of water to be discharged into the environment, sets standards and discharge measures for a wide range of parameters in water discharged from various industries. It also sets out the minimum/maximum limits for param in drinking water
16	National Air Quality Standard Decree No. 59	1991	The World Health Organization (WHO) air quality standards were adopted by the then Federal Ministry of Environment (FMEEnv) in 1991 as the national standards. These standards define the levels of air pollutants that should not be exceeded in order to protect public health.
17	National Policy on Flood and Erosion Control (FMEEnv)	2006	This policy addresses the need to combat erosion in the country utilizing the procedures outlined in the National Action Plan for Flood and Erosion Control and Technical Guidelines, developed by the WIC Environmental Committee which was set up to plan an operational platform for these issues
18	The Climate Change Act (CCA)	2021	The CCA primary aim is to develop and implement mechanisms that will foster low carbon emission and develop a sustainable environment in the country.
19	EIA Sectoral Guidelines for Infrastructure – Transportation Development Project (Roads and Highways)	1995	The guidelines were designed to assist project proponents in conducting detailed environmental assessment of roads and highways projects with emphasis on the significant associated and potential impacts of such projects on the environment.
20	National Environmental (Construction Sector) Regulations, 2011. (S.I No. 19)	2011	The purpose of these regulations is to prevent and minimize pollution from construction, decommissioning and demolition activities in the Nigerian environment. It stipulates that new projects in the construction sector shall apply cost-effective, up-to-date, efficient, best available technology, to minimize pollution to the barest degree practicable.
21	EIA Procedures and Charges Regulation	2021	The EIA Procedures and Charges Regulation provides guidelines on Project Proposal, Registration, Screening, Criteria for categorization, Scoping, Draft EIA report, Public Participation, Sectoral Guidelines, Review Process, Criteria and stages of disapproval, Follow-up programs, Penalties, Charges and fees, Decision making, Certification, Impact mitigation and compliance monitoring, and Environmental Auditing.
22	National Agricultural Technology and Innovation Policy (NATIP)	2022-2027	The policy document aims at developing end-to-end value chain solutions and articulates the importance of an integrated approach for rural infrastructure development and strengthening value chains. Inadequate and costly transport infrastructure, including rural transport, is one of the major constraints identified in the policy document.
23	Forestry Law CAP 51 LFN	1994	This law provides a comprehensive legal framework for the management, conservation, and sustainable utilization of forest resources in the country. It outlines provisions for the protection of forest reserves, regulation of logging activities, prevention of deforestation, and promotion of afforestation and reforestation efforts. The law establishes mechanisms for the issuance of forestry permits, licenses, and leases, as well as the establishment of forestry institutions and agencies responsible for enforcement and oversight.

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S/N	Regulations	Year	Provisions
24	Endanger Species (Control of International Trade and Traffic) Act CAP E9 LFN	2004	The Endangered Species (Control of International Trade and Traffic) Act CAP E9 LFN 2004 of Nigeria serves as a vital legislative tool in safeguarding endangered species from illegal trade and exploitation. Under this act, the government establishes strict controls and regulations to manage the international trade and transportation of endangered flora and fauna species, thereby ensuring their conservation and sustainable use. The legislation prohibits the import, export, and possession of endangered species without proper authorization and permits, aiming to curb illicit trafficking and protect biodiversity. Through robust enforcement mechanisms and cooperation with international conservation organizations, the Act aims to combat wildlife crime and preserve Nigeria's rich natural heritage for future generations.
25	Natural Resources Conservation Act CAP 268 LFN	1990	This act aims to regulate and promote the sustainable management and conservation of natural resources in Nigeria. It establishes measures for the protection of biodiversity, wildlife habitats, and ecosystems, with provisions for the prevention of environmental degradation, pollution, and unsustainable exploitation of natural resources. The Act empowers relevant authorities to enforce regulations concerning the utilization of land, water, forests, and other natural assets, ensuring their responsible management for present and future generations. Additionally, it may contain provisions for the establishment of protected areas, wildlife reserves, and conservation zones to safeguard critical ecosystems and species diversity across the country.

**National Environmental Standards and Regulations Enforcement Agency (NESREA)** - is an environmental agency of the Federal Government of Nigeria that was established by law in 2007 to "ensure a cleaner and healthier environment for Nigerians". The agency functions as a parastatal of the Federal Ministry of Environment and is headed by a Director General who is also the chief executive officer. NESREA has recorded several achievements in the area of environmental compliance monitoring and enforcement since its establishment, including the enactment of several regulations pertaining to environmental protection, monitoring environmental compliance and enforcement actions.

### 3.1.2 Applicable Social Development Policy, Legal and Regulatory Frameworks

There are several national legal and regulatory frameworks on social development in Nigeria. These includes policies, regulations and guidelines on Land Use, Labour and Working Conditions, Occupational Health and Safety, Social Protection, Gender, Child Rights, Community Health and Safety, Cultural Heritage Management, etc. Table 3 below summarizes the provisions of some national legal and regulatory frameworks on social development applicable to RAAMP-SU.

**Table 3: National Legal and Regulatory Frameworks on Social Development**

S/N	Regulations	Year	Provisions
1	National Road Traffic Regulations	2012	This Regulation provide operational requirements, rules and regulations for (i) the registration and licensing of vehicles, (ii) establishment and regulation of driving schools, (iii) vehicle identification numbers, learner's permit and driver's license, (iv) drivers and conductors' registration and badges, (v) taxis, stage carriages, omnibuses and motorcycles for hire etc. It also makes provisions relating to exempted bodies, operators of transport services, operation of ambulance services and towing vehicles; and provides miscellaneous motor traffic regulations to ensure road safety.
2	National Social Protection Policy	2021	The overarching goal of the National Social Protection Policy is to establish a gender sensitive and age-appropriate framework to ensure a minimum social floor for all Nigerian citizens for a life of dignity. Some of its objectives include to <ul style="list-style-type: none"> <li>• reduce poverty among the people vulnerable to being poor;</li> <li>• empower the poor and people vulnerable to economic shocks;</li> <li>• enhance human capital development to ensure a life of dignity;</li> </ul>



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S/N	Regulations	Year	Provisions
			<ul style="list-style-type: none"> <li>provide guiding principles for managing social protection projects and programs;</li> <li>promote social cohesion, equity and growth inclusiveness; etc.</li> </ul>
3	Land Use Act	1978	The Act stipulates that all land comprised in the territory of each State in the Federation are hereby vested in the Governor of that State and such land shall be held in trust and administered for the use and common benefit of all Nigerians in accordance with the provisions of this Act.
4.	National Gender Policy	2006	The overall goal is to build a just society devoid of discrimination, harness the full potentials of all social groups regardless of sex or circumstance, promote the enjoyment of fundamental human rights and protect the health, social, economic and political well being of all citizens in order to achieve equitable rapid economic growth; evolve an evidence based planning and governance system where human, social, financial and technological resources are efficiently and effectively deployed for sustainable development.
5	Labour Act	2004	The Labour Act, 2004, is the principal legislation governing employment relation in Nigeria. Its application extends to employees engaged under a contract of labour or clerical work in both the private and the public sectors.
6	National Policy on Occupational Safety and Health (Revised)	2020	Provides a framework for action, to facilitate improvement of OHS performance for participative OHS protection of all workers in all sectors of the Nigerian economy
7	Guidelines for the implementation of the Revised National Policy on Occupational Safety and Health	2021	Provides implementation guidelines for employers, workers and their organizations to implement the National Policy on Occupational Safety and Health and OHS programs and respond to emerging OHS issues.
8	National Workplace Policy on HIV and AIDS	2013	This Policy provides guidelines for government, employers, workers and other stakeholders in the workplace and identifies strategies and programmes based on ILO Recommendation Concerning HIV and AIDS.
9	Penal Code Act (cap.63)	1960	The Nigeria Penal Code Act of 1960 is a criminal code that applies primarily in the northern states of Nigeria. It is based on Islamic law principles and defines various offenses and their punishments.
10	Criminal Code	1916	The Criminal Code stipulates that No person shall be liable to be tried or punished in any court in Nigeria for an offence except under the express provisions of the Code or of some Act or law which is in force in, or forms part of, the laws of Nigeria.
11	Nigeria National Health Act	2014	This Act provides a framework for the regulation, development, and management of Nigeria's health system. It establishes the National Health System, the Basic Health Care Provision Fund, and other provisions aimed at improving public health.
12	Social Development Act	1974	The Act is to establish a Social Development division of the Ministry of Employment Labour and Productivity and to define its duties. It is charged with the following responsibilities: co-ordination of inter-governmental and inter-state social development activities; conduct of research and surveys in various aspects of social development; training of professional social workers and the organisation and co-ordination of training facilities for governmental and non-governmental social agencies; international casework and adoption inquiries; promotion of legislation at the national level on matters affecting social development; etc.
13	The Child Rights Act	2003	This Act was established to provide and protect the rights of a Nigerian child; and other related matters.
14	The Factories Act, CAP F1, LFN	2004	The Factory Act and Subsidiary Legislature constitutes the principal legislature tool in Nigeria for regulating the conditions under which work is carried out, thus providing the legal backbone for the prevention of occupational accidents and diseases. It also provides for other workers and professionals for whom no adequate legal provisions for health and safety, and welfare have been made.
15	Factories (Sanitary Accommodation) Regulations	1958	Provides for the provision of sanitary conveniences to all docks under the jurisdiction of the Docks (Safety of Labour) Regulations.
16	Nigeria National Employment Policy	2017	The goal of the National Employment Policy is to create the enabling environment for productive and employment-intensive growth in Nigeria. The objectives of the National Employment Policy are to: i) Promote the goal of full employment as a priority in national, economic and social policy, and to enable all men and women who are available and willing to work, to attain secured and sustainable livelihood through full productive and freely chosen employment and work; ii) Provide the fullest possible opportunity to

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S/N	Regulations	Year	Provisions
			each worker to qualify for and to use his/her skills and endowments in a job for which he/she is well suited, irrespective of race, sex, religion, political opinion, physical disabilities, national extraction, ethnic or social origin; iii) Stimulate economic growth and development, eradicate poverty, and improve the levels of living by minimizing the rates of unemployment and underemployment, optimizing the utilization of labour and human resources and protecting areas in which Nigeria is well endowed. Furthermore, to promote the development of relevant manpower/human resources that will continually meet the needs of the nation.
17	First Aid Boxes (Prescribed Standards) Order	1958	Gives specifications for the provision of first aid boxes to be provided at factories in line with the number of employees present.
18	Declaration of Occupational Diseases Notice	1956	Provides for the identification of diseases or illnesses that might be contracted by an employed person by reason of the nature of his employment.
19	National Cultural Policy	1988	National Cultural Policy (1988) sets directions for the following: affirmation of the authentic cultural values and cultural heritage; building up of a national cultural identity and parallel affirmation of cultural identities of different ethnic groups. Federal Ministry of Information & Culture has a mandate to promote the nation's rich cultural heritage. National Commission for Museums and Monuments has a mandate to manage the collection, documentation, conservation and presentation of the National Cultural properties.
20	The Freedom of Information Act	2011	The purpose of the Act is to make public records and information more freely available, provide for public access to public records and information, protect public records and information to the extent consistent with the public interest and the protection of personal privacy, protect serving public officers from adverse consequences for disclosing certain kinds of official information without authorization, and establish procedures for the achievement of those objectives. This Act applies not only to public institutions but also to private organisations providing public services, performing public functions or utilizing public funds. According to the Act: <ul style="list-style-type: none"> <li>All stakeholders are entitled to access to any records under the control of the government or public institution</li> <li>Any stakeholder denied information can initiate a court proceeding to affect the release of such information</li> <li>All public institutions shall make available any records as requested by the stakeholders within a period of 7 days.</li> </ul>
21	Public Complaints Commission Act	1975	The Public Complaints Commission Act of 1975 establishes the Public Complaints Commission (PCC) as an independent body to investigate complaints of administrative injustice in Nigeria. The commission is headed by a chairman and has commissioners appointed by the president. <p>The Act defines administrative injustice as any action or omission of a government agency that results in prejudice or harm to any person or group, or which is inconsistent with the law or principles of fair administration. The PCC is authorized to receive complaints from any person or group affected by administrative injustice, and has the power to investigate such complaints and make recommendations to the government agency concerned.</p> <p>The Act also establishes procedures for the investigation of complaints, including the power of the commission to summon witnesses, obtain documents, and make inquiries. The commission is required to report its findings and recommendations to the government agency concerned and the complainant, and the agency is required to respond within 30 days.</p> <p>The Act further provides for the establishment of state branches of the commission, with similar powers and duties as the national body.</p> <p>Overall, the Public Complaints Commission Act of 1975 is intended to provide a means for individuals and groups to seek redress for administrative injustice in Nigeria, and to promote transparency and accountability in government agencies.</p>
22	National Orientation Agency Act	2005	The Nigeria National Orientation Agency (NOA) Act was established in 2005 to provide a platform for disseminating information on government policies, programs, and activities, as well as to promote national unity and integration in Nigeria. <p>The Act defines the NOA as a body corporate with perpetual succession and a governing board consisting of a chairman and members appointed by the president. The NOA is responsible for promoting the image and identity of Nigeria, and for educating Nigerians on their civic responsibilities and obligations.</p>

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S/N	Regulations	Year	Provisions
			<p>The Act further defines the functions of the NOA to include:</p> <ol style="list-style-type: none"> <li>1. Promoting the principles of democracy, good governance, and national development</li> <li>2. Providing information and enlightenment on government policies, programs, and activities to the public</li> <li>3. Promoting national unity and integration by encouraging mutual understanding and respect among the diverse ethnic and religious groups in Nigeria</li> <li>4. Encouraging active participation of citizens in the democratic process and national development</li> <li>5. Promoting cultural and moral values that are consistent with the aspirations of the Nigerian society</li> </ol> <p>The NOA is also responsible for organizing seminars, workshops, and conferences for the public to educate them on national issues, and for conducting research on issues related to national orientation.</p> <p>Overall, the Nigeria National Orientation Agency Act is intended to promote national unity, integration, and good governance in Nigeria by providing a platform for disseminating information on government policies and programs, and educating Nigerians on their civic responsibilities and obligations.</p>
23	National Disaster Risk Management Policy	2018	<p>This policy outlines the framework for disaster risk reduction, preparedness, response, and recovery efforts in Nigeria. It emphasizes the need for coordinated multi-sectoral action, capacity building, community participation, and integration of disaster risk reduction into development planning at all levels. Additionally, various agencies and institutions, such as the National Emergency Management Agency (NEMA), are responsible for implementing specific aspects of disaster management in the country.</p>
24	The Nigerian Urban and Regional Planning Act, Cap N138	2004	<p>The Nigerian Urban and Regional Planning Act, Cap N138 2004, establishes a comprehensive framework for regulating urban and regional development in Nigeria. It mandates the establishment of planning authorities at different government levels to oversee land use planning activities. The Act empowers these authorities to control development, enforce zoning regulations, and consider environmental factors in planning decisions. Public participation is encouraged in the planning process, and enforcement mechanisms are in place to ensure compliance with planning regulations. Professional standards are also outlined for urban and regional planning practitioners.</p>

Source: *Environmental Law Research Institute (ELRI)*<sup>9</sup>

### Other relevant statutes and laws related to Environmental and Social Management and Protection in the Agriculture and Rural Development sector include:

- Federal Solid and Hazardous Waste Management Regulations (1991)
- Harmful Waste (Special Criminal Provisions) Act (2004)
- National Environmental Protection (Effluent Limitation) Regulations (1991)
- National Environmental Protection (Management of Solid and Hazardous Wastes) Regulations, (1991)
- National Environmental Protection (Pollution Abatement in Industries and Facilities Generating Wastes) Regulation, (1991)
- Rehabilitation, Reconstruction and Development Act, 1990
- National Commission for Museums and Monuments Act, 1990

### 3.1.3 Administrative Structure for the Agriculture and Rural Development Sector in Nigeria

**Federal Ministry of Agriculture and Food Security (FMAFS)** The Ministry's mandate is to ensure food security in crops, livestock and fisheries, stimulate agricultural employment and services, promote the production and supply of raw materials to agro-industries, provide markets for the products of the industrial sector, generate foreign exchange and aid rural socio-economic development. It has nine (9) service and eleven (11) technical departments. These departments and parastatals are saddled with responsibilities such as:

<sup>9</sup> ELRI: Nigeria Environmental Management and Social Development Policy, Legal and Regulatory Frameworks

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- Increasing agricultural production through the promotion of supportive and service-oriented sub-sectoral activities to enhance production, productivity and marketing opportunities.
- Coordinating agricultural and rural development data and information management systems.
- Inventorying land resources and controlling land use and degradation, as well as promoting climatic change adaptation and resilience practices.
- Encouraging agricultural commodities development and marketing institutions.
- Promoting rural health, nutrition and infrastructural development.
- Collaborating with development partners on agricultural development initiatives.

**Federal Department of Rural Development (FDRD):** The FDRD has responsibility for formulating policies and strategies for rural development and for fostering integrated rural development. Its mandate is to accelerate the transformation of the nation's rural life and landscape in a coordinated and sustainable manner with a view to eradicate rural poverty, expand rural economic opportunities, enhance food security and integrate rural dwellers into the mainstream of national development. The FDRD, like the other departments, maintains offices in most states with little or no service linkages with the state ministries or Agricultural Development Projects (ADPs).

**Federal Department of Agriculture (FDA):** The FDA has four technical divisions that implement federal government-supported programs at the state level and provide technical backstopping to State Ministries of Agriculture (SMoA), including Agricultural Development Projects (ADPs).

### 3.1.4 Administrative Structure for Land Use and Land Acquisition in Nigeria

**Federal Ministry of Housing and Urban Development:** The Mandate of the Ministry is primarily to formulate and implement the policies, programmes and projects of the FGN with respect to road transport, highways construction and rehabilitation; Highways planning and design; monitoring and maintenance of federal roads & bridges, nationwide; Provision of infrastructure as well as survey & mapping of the nation's internal and international boundaries (works); and Habitat and affordable housing for Nigerians (Housing). Structurally, the Ministry has undergone some changes in recent times aimed at ensuring the effective discharge of its mandate. It is presently structured into fifteen (15) professional departments and seven units. The departments are: - a) Highways, Planning & Development; b) Human Resource Management; c) Highways Construction and Rehabilitation; d) Finance and Accounts; e) Planning, Research and Statistics; f) Information and Communication Technology; g) Public Building; h) Procurement; i) Federal Public Assets Management; j) Reform Coord. & Service Improvement; k) Highway Bridges and Design; l) Highways, Mat. Geo-Technics & QC; m) Engineering Services; n) Urban and Regional Development; o) Lands and Housing Development.

- **Department of Lands and Housing Development:** The Department has the following statutory responsibilities: a) Administration and management of Federal Government lands and landed properties within and outside the country; b) Valuation of landed properties for all purposes (sale, rental, purchase, insurance, acquisition and compensation, investment, etc.) for MDAs; c) Acquisition of land and payment of compensation for such lands on behalf of Federal Government Ministries, Departments and Agencies; d) Formulation and implementation of policies on land including National Land Policy and Land Reform Programme of the Federal Government; e) Providing the Secretariat and focal point for collaboration with foreign development partners and multilateral agencies on matters relating to land for agriculture, housing development, housing finance/mortgage and land administration reforms, etc.

### 3.1.5 Administrative Structure for Labour and Employment in Nigeria

**Federal Ministry of Labour and Employment (FMLE):** The Mandate of the Ministry is primarily to provide sustainable enabling environment for full labour force participation through skills development, employment creation, enhanced productivity and peaceful industrial relations that promote decent work principles and practices in Nigeria. Specific functions include: a) Development and promotion of productive employment policies and programmes for employment generation and actualization of national employment policies of the Federal Government; b) Stimulation and enhancement of national Productivity Consciousness, rewards for excellence and promotion of national competitiveness; c) Skills Development, upgrading, certification, placement and empowerment of artisans, tradesmen and applicants in various areas of national needs; d) Provision of Social Security Coverage, Welfare and Employee's

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Compensation to the nation's workforce; e) Provision of Labour Protection Services, supervision, enforcement, Education, Promotion of Social Justice, Ratification, Implementation and Review of National Labour Laws and Policies including collective bargained agreements; f) Promotion of Occupational Safety and Health; g) Enforcement of the Labour Laws, etc.

**National Labour Congress (NLC):** The fundamental aims and objectives of the Congress are to protect, defend, and promote the rights, wellbeing and the interests of all workers, pensioners, the trade unions and the working class in general; and also to promote and defend a Nigerian nation that would be just, democratic, transparent and prosperous through the attainment of the following objectives: a) To promote, defend and advance the economic, political and social rights and wellbeing of Nigerian workers and pensioners; b) To continually enhance the quality of life and improve the income and other working conditions of workers c) To promote and sustain the unity of Nigerian Trade Unions, ensure total unionization of all workers irrespective of their creed, state of origin, gender and political beliefs; d) To promote the existence of one trade union and/ or one federation of trade unions in every industry; including the emergence of one central labour organization in Nigeria; e) To continually strive towards the attainment of gender equity and improvements in the status and conditions of women in the world of work and society; f) To work for the industrialization and prosperity of the Nigerian nation and ensure protection of jobs, full employment and a humane working environment; g) To continually struggle to influence public and corporate policies and legislation on all issues at all levels, in the interest of workers, disadvantaged social groups and trade unions; h) To promote and sustain positive industrial relations practice in Nigeria by strengthening collective bargaining in all sectors of the economy and internalizing appropriate work culture among workers; etc.

### 3.1.6 Administrative Structure for Gender and Vulnerable Groups in Nigeria

**Federal Ministry of Women Affairs (FMWA):** The broad mandate of the Ministry is to a) advise the government on gender and children's issues; issues affecting persons with disabilities and the aged b) initiate policy guidelines and lead the process of gender equality and mainstreaming at both the National and International levels. The ministry has 10 departments and they include: a) Women and gender affairs; b) Economic Services; c) Planning, research and statistics; d) Human resources management; e) General Services; f) Anti-Corruption Unit (ACTU), g) Child development; h) Legal services; i) Servicom; j) Finance and account

### 3.1.7 Administrative Structure of Environmental Regulatory Bodies and Agencies in Nigeria

Besides the Federal Ministry of Environment, several other agencies are involved in enforcing environmental compliance in Nigeria and are relevant to RAAMP-SU. These include:

**State Ministries of Environment (SMEnv):** The state ministries of environment have different names across the states and may assume responsibilities for other environmental management. Nonetheless, they are primarily responsible for the development of environmental policies for the states and fulfil the responsibilities of the FMEnv at the state level.

**State Environmental Protection Agencies (SEPAs) –** The SEPAs enforce environmental regulatory compliance at the state level respectively. They are mainly responsible for ensuring the overall protection of various aspects of the built, physical and biological environment by ensuring limits set by the FMEnv are not exceeded during development works, also ensuring that building constructions meet environmental requirements, proper siting of factories, air, noise, water quality monitoring etc. In some cases, they may be directly involved in waste management activities or allow the responsibility for waste management to be handled by the State Waste Management Agencies (SWMAs). It is important to note that not all states have SEPAs but all states has State Ministry of Environment under different nomenclature.

**State Waste Management Agencies (SWMAs) –** Generally at the state level, the SWMAs undertake the task of providing guidelines or enforcing proper waste management procedures. In some instances, the SWMAs may have designated dumpsites for specific types of waste and guide the process for waste conveyance to the dumpsites by waste generators or procure the services of licensed waste collection vendors to carry out the services of waste collection, treatment and final disposal.



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### 3.1.8 State Laws and Regulatory Framework on Environmental and Social Development.

Not all RAAMP-SU benefitting states have laws and regulatory frameworks on Environmental Management and Social Development. Some of the few are included in Table 4 below:

**Table 4: RAAMP-SU State-Level Legal and Regulatory Framework on Environmental Management and Social Development**

Prospective RAAMP-SU States	Legal and Regulatory Frameworks on Environmental Management and Social Development	Relevant ESSs
<b>Abia State</b>	<ul style="list-style-type: none"> <li>Abia State Basic Environmental Law No. 1 of 2004 amended in 2013</li> <li>Abia State Policy on Environment (2010)</li> <li>Abia State Flood and Erosion Control and Soil Conservation Policy (2010)</li> <li>Abia State Flood Control and Water Conservation Policy (2010)</li> <li>Abia Riverine Area Management Policy (2010)</li> <li>Abia State Watershed Management Policy (2010)</li> <li>Abia State Waste Management Law and Waste Management (Enforcement and Offences) Provisions Regulations (2002)</li> <li>Abia State Environmental Protection Agency Law, CAP 50, Vol. 2, Laws of Abia State (2006)</li> <li>Abia State Ministry of Physical Planning and Urban Development Law (1999)</li> <li>Abia State Environmental Protection Agency Law CAP 14 of 17<sup>th</sup> July, 1994.</li> <li>Abia State Traffic and Safety Management, 2023</li> </ul>	<ul style="list-style-type: none"> <li>ESS 1</li> <li>ESS 1</li> <li>ESS 3</li> <li>ESS 3</li> <li>ESS 6</li> <li>ESS 6</li> <li>ESS 3</li> <li>ESS 1</li> <li>ESS 5</li> <li>ESS 1</li> <li>ESS 4</li> </ul>
<b>Adamawa State</b>	<ul style="list-style-type: none"> <li>Adamawa State Environmental Protection Agency law 2021</li> <li>Adamawa (Violence Against Persons Prohibition) VAPP, 2015.</li> </ul>	<ul style="list-style-type: none"> <li>ESS 1</li> <li>ESS 4</li> </ul>
<b>Akwa Ibom State</b>	<ul style="list-style-type: none"> <li>Akwa Ibom Environmental Protection and Waste Management Agency Law (2000)</li> </ul>	<ul style="list-style-type: none"> <li>ESS 1, ESS 3</li> </ul>
<b>Anambra State</b>	<ul style="list-style-type: none"> <li>Anambra State Waste Management Agency (Establishment) Act 2010</li> <li>Anambra State Policy on Environment (2010)</li> <li>Anambra State Emergency Management Law (2000)</li> <li>Anambra State Flood and Erosion Control Management Support System (2010)</li> <li>Anambra Riverine Area Management Policy (2010)</li> <li>Anambra State Watershed Management Policy (2010)</li> </ul>	<ul style="list-style-type: none"> <li>ESS 3</li> <li>ESS 1</li> <li>ESS 2, ESS 4</li> <li>ESS 3</li> <li>ESS 6</li> <li>ESS 6</li> </ul>
<b>Bauchi State</b>	<ul style="list-style-type: none"> <li>Bauchi State Environmental Protection Agency (BASEPA) Edict No. 3 of 1997</li> </ul>	<ul style="list-style-type: none"> <li>ESS 1</li> </ul>
<b>Bayelsa State</b>	<ul style="list-style-type: none"> <li>Child's Right Law of Bayelsa State, 2016</li> <li>Bayelsa State Environmental Sanitation Authority Law (2012)</li> <li>Violence Against Persons Prohibition (VAPP), Bayelsa State 2021</li> </ul>	<ul style="list-style-type: none"> <li>ESS 2</li> <li>ESS 3</li> <li>ESS 4</li> </ul>
<b>Benue State</b>	<ul style="list-style-type: none"> <li>Benue State Environmental Authority Law, (2005)</li> <li>Benue State policy on environment, (2013)</li> <li>Child Rights Act, (2008)</li> <li>Human rights Law (2002)</li> <li>VAP Prohibition Law, 2019</li> </ul>	<ul style="list-style-type: none"> <li>ESS 1</li> <li>ESS 1</li> <li>ESS 2</li> <li>ESS 2</li> <li>ESS 4</li> </ul>
<b>Borno State</b>	<ul style="list-style-type: none"> <li>Borno State Rural Water &amp; Sanitation Agency Law, 2003</li> </ul>	<ul style="list-style-type: none"> <li>ESS 3</li> </ul>
<b>Cross River State</b>	<ul style="list-style-type: none"> <li>Cross River Environmental Protection Agency Law, 1996</li> <li>Cross River State Environment &amp; Carbon Emission Board Law</li> </ul>	<ul style="list-style-type: none"> <li>ESS1, ESS 3</li> <li>ESS 3</li> </ul>
<b>Delta State</b>	<ul style="list-style-type: none"> <li>Delta State Environmental Sanitation Law, (2008)</li> <li>Delta State Environmental Protection Agency Law, (2008)</li> <li>Delta State Waste Management Board Law, (2008)</li> <li>Delta State Policy on Climate Change</li> <li>Delta state Sanitation Law 2006</li> <li>Child Right's Act 2008</li> <li>Human rights Law 2002</li> <li>Delta State Renewable Energy Policy Roadmap;</li> <li>Delta State Forestry Law 2009;</li> <li>Delta State Ecology Law 2006</li> </ul>	<ul style="list-style-type: none"> <li>ESS 3</li> <li>ESS 1, ESS 3</li> <li>ESS 3</li> <li>ESS 3</li> <li>ESS 3</li> <li>ESS 3</li> <li>ESS 2</li> <li>ESS 2</li> <li>ESS 3</li> <li>ESS 6</li> <li>ESS 6</li> </ul>
<b>Ebonyi State</b>	<ul style="list-style-type: none"> <li>Ebonyi State Environmental Protection Agency Law, (1999)</li> </ul>	<ul style="list-style-type: none"> <li>ESS 3</li> </ul>
<b>Edo State</b>	<ul style="list-style-type: none"> <li>Edo State Environmental and Waste Management Board Law No 10 (2000)</li> <li>Edo State Forest Law, (1968)</li> <li>Child Rights Law (2007)</li> <li>Violence Against People Prohibition (VAPP) Law (2021);</li> <li>Edo State Security Trust Fund Law, 2019</li> </ul>	<ul style="list-style-type: none"> <li>ESS 3</li> <li>ESS 6</li> <li>ESS 2</li> <li>ESS 2, ESS4</li> <li>ESS 4</li> </ul>

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Prospective RAAMP-SU States	Legal and Regulatory Frameworks on Environmental Management and Social Development	Relevant ESSs
<b>Ekiti State</b>	<ul style="list-style-type: none"> <li>• Ekiti State Environmental Protection Agency Law, (2009)</li> <li>• Ekiti State Waste Management Authority Law No 7, (2000)</li> <li>• Ekiti State Urban and Regional Planning and Development Law, No. 16 (2011)</li> <li>• Ekiti State Public Works Corporation Law, (2011)</li> <li>• Child Rights Law 2004</li> <li>• Ekiti State Safety Commission Law, 2013;</li> <li>• The Violence Against Persons Prohibition Act (VAPP) 2017;</li> <li>• Ekiti State Gender Based Violence (Prohibition) Law, 2019</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 1, ESS 3</li> <li>• ESS 3</li> <li>• ESS 1</li> <li>• ESS 2</li> <li>• ESS 2, ESS 4</li> <li>• ESS 2, ESS 4</li> <li>• ESS 2, ESS 4</li> <li>• ESS 2, ESS 4</li> </ul>
<b>Enugu State</b>	<ul style="list-style-type: none"> <li>• Enugu State Waste Management Authority Law, (2004)</li> <li>• Child Rights and Responsibility Law (CRRL) 2016;</li> <li>• Enugu State Violence Against Persons (Prohibition) VAP Law, 2019;</li> <li>• Enugu State Social Protection Policy, 2010.</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 3</li> <li>• ESS 2, ESS 4</li> <li>• ESS 2, ESS 4</li> <li>• ESS 2, ESS 4</li> </ul>
<b>Gombe State</b>	<ul style="list-style-type: none"> <li>• Gombe State Environmental Policy (2020)</li> <li>• Lone Worker Policy (2020)</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 1, ESS 3</li> <li>• ESS 2</li> </ul>
<b>Imo State</b>	<ul style="list-style-type: none"> <li>• Imo State Environmental Protection Law No.7, 1992</li> <li>• Imo State Environmental Transformation Commission (Amendment) Law 2020</li> <li>• Imo State Waste Management Agency Law 2020</li> <li>• Imo State Policy on Labour (2020)</li> <li>• Imo State Employment and Empowerment Trust fund Law No 37 (2019)</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 1, ESS 3</li> <li>• ESS 1, ESS 3</li> <li>• ESS 3</li> <li>• ESS 2</li> <li>• ESS 2</li> </ul>
<b>Jigawa State</b>	<ul style="list-style-type: none"> <li>• Jigawa State Environmental Protection Agency Law (1991)</li> <li>• Social Protection Policy (2023);</li> <li>• Gender Policy (2023);</li> <li>• Violence Against Persons Provision Act (2021)</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 1, ESS 3</li> <li>• ESS 2, ESS 4</li> <li>• ESS 2, ESS 4</li> <li>• ESS 2, ESS 4</li> </ul>
<b>Kaduna State</b>	<ul style="list-style-type: none"> <li>• Kaduna Environmental Protection Agency (KEPA) Law 2010</li> <li>• Kaduna State Policy on the Environment (2019)</li> <li>• Kaduna State Environmental Protection Authority (KEPA) Law, Edict No. 1, 1994;</li> <li>• Kaduna State Child Welfare and Protection Law, 2021;</li> <li>• Kaduna State Violence Against Persons (Prohibition) Law No. 3A, 2018;</li> <li>• Kaduna State Gender Equity and Social Inclusion (GESI) Policy, 2017</li> <li>• The State Urban Planning &amp; Development Agency (KASUPDA) Law No 12 of as amended by the State Urban &amp; Regional Planning Law No. 31, 2018</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 1, ESS 3</li> <li>• ESS 1</li> <li>• ESS 1, ESS 3</li> <li>• ESS 2, ESS 4</li> <li>• ESS 2, ESS 4</li> <li>• ESS 2, ESS 4</li> <li>• ESS 1, ESS 5</li> </ul>
<b>Katsina State</b>	<ul style="list-style-type: none"> <li>• Katsina State Forestry Law (1987)</li> <li>• Katsina State Environmental Protection Policy 1988</li> <li>• Katsina State Emergency Management Agency Law No. 3 of 2013 (SEMA)</li> <li>• Katsina State Forestry Law (1987)</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 6</li> <li>• ESS 1</li> <li>• ESS 4</li> </ul>
<b>Kano State</b>	<ul style="list-style-type: none"> <li>• Kano State Environmental Protection Law, 2003</li> <li>• Kano State Environmental Pollution Control Law (Draft Bill), 2005</li> <li>• Kano State Environmental Sanitation Guidelines, 2004</li> <li>• Kano State Refuse Management &amp; Sanitation Board (REMASAB) Law, 2004</li> <li>• Kano State Public Health Edict, 1984</li> <li>• Kano State Land Use Charge (with Amendment) Law 2017</li> <li>• Kano State Persons Living with Disabilities Bill 2018</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 1, ESS 3</li> <li>• ESS 3</li> <li>• ESS 3</li> <li>• ESS 3</li> <li>• ESS 4</li> <li>• ESS 5</li> </ul>

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Prospective RAAMP-SU States	Legal and Regulatory Frameworks on Environmental Management and Social Development	Relevant ESSs
	<ul style="list-style-type: none"> <li>• Kano State Land Use Charge (with Amendment) Law 2017;</li> <li>• Integrated Rural Development Policy 2006</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 2,</li> <li>ESS 4</li> <li>• ESS 5</li> </ul>
<b>Kebbi State</b>	<ul style="list-style-type: none"> <li>• Kebbi State Land Use Regulations (2022)</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 1,</li> <li>ESS 5</li> </ul>
<b>Kogi State</b>	<ul style="list-style-type: none"> <li>• Kogi State Environmental Protection Law 2006</li> <li>• Kogi State Health Insurance Scheme Law 2018</li> <li>• Kogi State Social Protection Policy</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 1,</li> <li>ESS 3</li> <li>• ESS 2,</li> <li>ESS 4</li> <li>• ESS 2,</li> <li>ESS 4</li> </ul>
<b>Kwara State</b>	<ul style="list-style-type: none"> <li>• Kwara State Environmental Protection Agency Law 1992</li> <li>• Kwara State Environmental Sanitation (Amendment) Law 2015</li> <li>• Kwara State Agricultural Micro-Credit Scheme Law, 2008</li> <li>• Kwara State Health Insurance Scheme Law 2017</li> <li>• Kwara State Community Health Insurance Scheme Law, 2012</li> <li>• Kwara State Road Traffic Management Authority Law, 2010</li> <li>• Kwara State Roads Maintenance Agency Law 2004</li> <li>• Kwara State Land Development (Provision for Roads) Law 1983</li> <li>• Kwara State Emergency Management Agency Law 2007</li> <li>• Kwara State Land Use Act 2011</li> <li>• Kwara State Land Charge (Amendment Law) 2013</li> <li>• Kwara State Rural Water Supply and Sanitation Agency Law 2006</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 1,</li> <li>ESS 3</li> <li>• ESS 3</li> <li>• ESS 2,</li> <li>ESS 4</li> <li>• ESS 4</li> <li>• ESS 4</li> <li>• ESS 4</li> <li>• ESS 4</li> <li>• ESS 5</li> <li>• ESS 4</li> <li>• ESS 5</li> <li>• ESS 5</li> <li>• ESS 3</li> </ul>
<b>Lagos State</b>	<ul style="list-style-type: none"> <li>• Lagos State Environmental Management Protection Law 2017</li> <li>• Lagos State Waste Management Authority Law, 2015</li> <li>• Lagos State Health Scheme (Amendment) Law, 2018</li> <li>• Lagos State Urban and Regional Planning Development (Amendment) Law, 2019</li> <li>• Lagos State Land Use Charge (Amendment) Law, 2020</li> <li>• Lagos State Domestic and Sexual Violence Agency, Law, 2021</li> <li>• Lagos State Safety Commission, 2011</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 1,</li> <li>ESS 3</li> <li>• ESS 3</li> <li>• ESS 4</li> <li>• ESS 5</li> <li>• ESS 5</li> <li>• ESS 4</li> <li>• ESS 2,</li> <li>ESS 4</li> </ul>
<b>Nasarawa State</b>	<ul style="list-style-type: none"> <li>• Nasarawa State Environmental Law 2004</li> <li>• Child's Right Law of Nasarawa State, 2005</li> <li>• Nasarawa State Emergency Management Agency Law 2009</li> <li>• Nasarawa State Rural Water and Supply and Sanitation Agency Law 2001</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 1</li> <li>• ESS 2</li> <li>• ESS 4</li> <li>• ESS 3</li> </ul>
<b>Niger State</b>	<ul style="list-style-type: none"> <li>• Niger State Environmental Protection Law 2011</li> <li>• Niger State Health Scheme law 2018</li> <li>• Niger State Policy on Agriculture 2020</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 1,</li> <li>ESS 3</li> <li>• ESS 4</li> </ul>
<b>Ogun State</b>	<ul style="list-style-type: none"> <li>• Ogun State Policy on Environment, Edict No. 1 of 1995.</li> <li>• Ogun State Air Quality Regulations 2023</li> <li>• Ogun State Water Supply (Ground Water Control) Regulations 2017</li> <li>• Ogun State Government Forestry and Wildlife Law</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 1</li> <li>• ESS 3</li> <li>• ESS 3</li> <li>• ESS 6</li> </ul>
<b>Ondo State</b>	<ul style="list-style-type: none"> <li>• Ondo State Waste Management Authority (Enforcement and Offenders Provisions Regulations) Law (2002)</li> <li>• Ondo State Child's Right Act 2021</li> <li>• CAP 50, subsections (A-F) of Ondo State Laws 2006 (Environmental Protection Agency Law)</li> <li>• Ondo State Violence Against Persons Prohibition Act (VAPP) 2021</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 3</li> <li>• ESS 2</li> <li>• ESS 1,</li> <li>ESS 3</li> <li>• ESS 2,</li> <li>ESS 4</li> </ul>
<b>Osun State</b>	<ul style="list-style-type: none"> <li>• Osun State Environmental Protection Bill 2022</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 1,</li> <li>ESS 3</li> </ul>
<b>Oyo State</b>	<ul style="list-style-type: none"> <li>• Oyo State Environmental Sanitation and Waste Control Regulation 2013</li> <li>• Oyo State Violence Against Women Law 2016</li> <li>• Oyo State Primary Health Care Board Law, 2016.</li> <li>• Oyo State Land Use Charge Bill 2023</li> <li>• Oyo State Security Network Agency Law, 2020</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 3</li> <li>• ESS 2,</li> <li>ESS 4</li> <li>• ESS 4</li> <li>• ESS 5</li> </ul>

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Prospective RAAMP-SU States	Legal and Regulatory Frameworks on Environmental Management and Social Development	Relevant ESSs
		<ul style="list-style-type: none"> <li>• ESS 2, ESS 4</li> </ul>
<b>Plateau State</b>	<ul style="list-style-type: none"> <li>• Plateau State Basic Environmental Law 1997</li> <li>• Plateau State Property and Land Use Charge Law, 2021</li> <li>• Plateau State Penal Code Law 2017</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 1</li> <li>• ESS 5</li> <li>• ESS 2</li> </ul>
<b>Rivers State</b>	<ul style="list-style-type: none"> <li>• Rivers State Environmental Sanitation (Amendment) Law 1991</li> <li>• Rivers State Waste Management Law 2014</li> <li>• Rivers State Land Development (Provision for Roads) Law 1933</li> <li>• Rivers State Agricultural (Amendment) Law 1964</li> <li>• Rivers State Agricultural Production and Marketing Corporation Law 1974</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 3</li> <li>• ESS 3</li> <li>• ESS 5</li> </ul>
<b>Sokoto State</b>	<ul style="list-style-type: none"> <li>• Sokoto State Waste Management Act (1998)</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 3</li> </ul>
<b>Taraba State</b>	<ul style="list-style-type: none"> <li>• Taraba State Environmental Protection Agency Law 2004</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 1, ESS 3</li> </ul>
<b>Yobe State</b>	<ul style="list-style-type: none"> <li>• Yobe State Ministry of Environment Edict, 1992</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 1</li> </ul>
<b>Zamfara State</b>	<ul style="list-style-type: none"> <li>• Zamfara State Environmental Sanitation Agency Law, No. 22, 2010;</li> <li>• Child Protection law 2022;</li> <li>• Social Protection Policy 2023</li> <li>• Zamfara Geographic Information Service (ZAGIS) Land Use Regulation 2019</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 3</li> <li>• ESS 2,</li> <li>• ESS 4</li> <li>• ESS 2,</li> <li>• ESS 4</li> <li>• ESS 5</li> </ul>
<b>FCT</b>	<ul style="list-style-type: none"> <li>• Abuja Environmental Protection Board Act, 1997</li> <li>• Waste Management Regulations 2012</li> <li>• Solid Waste Management Plan 2011-2015 and 2017-2021</li> </ul>	<ul style="list-style-type: none"> <li>• ESS 1, ESS 3</li> <li>• ESS 3</li> <li>• ESS 3</li> </ul>

### 3.1.9 State-Level Institutional Arrangement for Environmental Protection and Waste Management at the RAAMP-SU States.

The institutions responsible for environmental protection and waste management at the RAAMP-SU states are provided in Table 5 below.

**Table 5: State-Level Institutions Responsible for Environmental Protection and Waste Management at the RAAMP-SU States**

S/N	RAAMP-SU States	Institutions Responsible for Environmental Protection and Waste Management
1.	<b>Abia State</b>	<ul style="list-style-type: none"> <li>• Abia State Ministry of Environment</li> <li>• Abia State Environmental Protection Agency (ASEPA)</li> </ul>
2.	<b>Adamawa State</b>	<ul style="list-style-type: none"> <li>• Adamawa State Ministry of Environment and Natural Resources Development</li> <li>• Adamawa State Environmental Protection Agency (ADSEPA)</li> <li>• Adamawa State Waste Management Agency (ADWMA)</li> </ul>
3.	<b>Akwa Ibom State</b>	<ul style="list-style-type: none"> <li>• Akwa Ibom State Ministry of Environment and Petroleum Resources</li> <li>• Akwa Ibom State Environmental Protection and Waste Management Agency (AKSEPWMA)</li> </ul>
4.	<b>Anambra State</b>	<ul style="list-style-type: none"> <li>• Anambra State Ministry of Environment</li> <li>• Anambra State Environmental Protection Agency (ANSEPA)</li> </ul>
5.	<b>Bauchi State</b>	<ul style="list-style-type: none"> <li>• Bauchi State Ministry of Environment and Housing</li> <li>• Bauchi State Environmental Protection Agency (BASEPA)</li> </ul>
6.	<b>Bayelsa State</b>	<ul style="list-style-type: none"> <li>• Bayelsa State Ministry of Environment</li> <li>• Bayelsa State Environmental Sanitation Authority</li> </ul>
7.	<b>Benue State</b>	<ul style="list-style-type: none"> <li>• Benue State Ministry of Water Resources and Environment</li> <li>• Benue State Environmental Sanitation Authority (BENSESA)</li> </ul>
8.	<b>Borno State</b>	<ul style="list-style-type: none"> <li>• Borno State Ministry of Environment</li> <li>• Borno State Environmental Protection Agency</li> </ul>
9.	<b>Cross River State</b>	<ul style="list-style-type: none"> <li>• Cross River Ministry of Environment</li> <li>• Cross River State Waste Management Agency</li> </ul>
10.	<b>Delta State</b>	<ul style="list-style-type: none"> <li>• Delta State Ministry of Environment</li> <li>• Delta State Waste Management Board</li> </ul>
11.	<b>Ebonyi State</b>	<ul style="list-style-type: none"> <li>• Ebonyi State Ministry of Health &amp; Environmental</li> <li>• Ebonyi State Environmental Protection Agency (EBSEPA)</li> </ul>
12.	<b>Edo State</b>	<ul style="list-style-type: none"> <li>• Edo State Ministry of Environment and Sustainability</li> </ul>

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S/N	RAAMP-SU States	Institutions Responsible for Environmental Protection and Waste Management
		<ul style="list-style-type: none"> <li>Edo State Environmental &amp; Waste Management Board</li> </ul>
13.	Ekiti State	<ul style="list-style-type: none"> <li>Ekiti State Ministry of Environment and Natural Resources</li> <li>Ekiti State Environmental Protection Agency (EKSEPA)</li> <li>Ekiti State Waste Management Authority (EKSWMA)</li> </ul>
14.	Enugu State	<ul style="list-style-type: none"> <li>Enugu State Ministry of Environment and Mineral Resources</li> <li>Enugu State Environmental Protection Agency</li> <li>Enugu State Waste Management Authority</li> </ul>
15.	Gombe State	<ul style="list-style-type: none"> <li>Gombe State Ministry of Water Resources &amp; Environment</li> <li>Gombe State Environmental Sanitation &amp; Protection Agency</li> </ul>
16.	Imo State	<ul style="list-style-type: none"> <li>Imo State Ministry of Petroleum &amp; Environment</li> <li>Imo State Environmental Protection Agency</li> <li>Imo State Bureau for Sanitation &amp; Transport</li> </ul>
17.	Jigawa State	<ul style="list-style-type: none"> <li>Jigawa State Ministry of Environment</li> <li>Jigawa State Environmental Protection Agency (JISEPA)</li> </ul>
18.	Kaduna State	<ul style="list-style-type: none"> <li>Kaduna State Ministry of Environment &amp; Natural Resources</li> <li>Kaduna State Environmental Protection Agency</li> </ul>
19.	Kano State	<ul style="list-style-type: none"> <li>Kano State Environmental Protection Agency (KSEPA)</li> <li>Kano State Refuse Management &amp; Sanitation Board (REMASAB)</li> </ul>
20.	Katsina State	<ul style="list-style-type: none"> <li>Katsina State Ministry of Environment</li> <li>Katsina State Environmental Protection Agency (KTSEPA)</li> </ul>
21.	Kebbi State	<ul style="list-style-type: none"> <li>Kebbi State Ministry of Environment</li> <li>Kebbi State Urban Development Authority</li> </ul>
22.	Kogi State	<ul style="list-style-type: none"> <li>Kogi State Ministry of Environment &amp; Physical Planning Development</li> <li>Kogi State Environmental Protection Board</li> </ul>
23.	Kwara State	<ul style="list-style-type: none"> <li>Kwara State Ministry of Environment &amp; Tourism</li> <li>Kwara State Environmental Protection Agency</li> </ul>
24.	Lagos State	<ul style="list-style-type: none"> <li>Lagos State Ministry of The Environment and Water Resources</li> <li>Lagos State Waste Disposal Board (LSWDB)</li> <li>Lagos State Environmental Protection Agency (LASEPA)</li> <li>Lagos State Waste Management Authority (LAWMA)</li> <li>Lagos State Waste management Agency Operatives (PSPs)</li> </ul>
25.	Nasarawa State	<ul style="list-style-type: none"> <li>Nasarawa State Ministry of Environment and Natural Resources</li> <li>Nasarawa State Waste Management and Sanitation Authority (NASWAMSA)</li> </ul>
26.	Niger State	<ul style="list-style-type: none"> <li>Niger State Ministry of Environment</li> <li>Niger State Environmental Protection Agency (NISEPA)</li> </ul>
27.	Ogun State	<ul style="list-style-type: none"> <li>Ogun State Ministry of Environment</li> <li>Ogun State Environmental Protection Agency</li> </ul>
28.	Ondo State	<ul style="list-style-type: none"> <li>Ondo State Ministry of Environment</li> <li>Ondo State Waste Management Authority</li> </ul>
29.	Osun State	<ul style="list-style-type: none"> <li>Osun State Ministry of Environment and Sanitation</li> <li>Osun State Environmental Protection Agency</li> <li>Osun State Waste Management Agency (OWMA)</li> </ul>
30.	Oyo State	<ul style="list-style-type: none"> <li>Oyo State Ministry of Environment &amp; Water Resources</li> <li>Ibadan Waste Management Authority (IWMA)</li> </ul>
31.	Plateau State	<ul style="list-style-type: none"> <li>Plateau State Ministry of Environment</li> <li>Plateau State Environmental Protection &amp; Sanitation Agency</li> </ul>
32.	Rivers State	<ul style="list-style-type: none"> <li>River State Ministry of Environment</li> <li>River State Environmental Sanitation Authority</li> <li>River State Environmental Protection Agency</li> </ul>
33.	Sokoto State	<ul style="list-style-type: none"> <li>Sokoto State Ministry of Environment</li> <li>Sokoto State Environmental Protection Agency (SEPA)</li> </ul>
34.	Taraba State	<ul style="list-style-type: none"> <li>Taraba State Ministry of Environment</li> <li>Taraba State Environmental Protection Agency</li> </ul>
35.	Yobe State	<ul style="list-style-type: none"> <li>Yobe State Ministry of Environment</li> <li>Yobe State Environmental Protection Agency (YOSEPA)</li> <li>Yobe State Ministry of Agriculture and Natural Resources</li> <li>Yobe State Agriculture and Rural Development Authority</li> </ul>
36.	Zamfara State	<ul style="list-style-type: none"> <li>Zamfara State Ministry of Environment &amp; Solid Minerals Development</li> <li>Zamfara Environmental Sanitation Agency (ZESA)</li> </ul>
37.	FCT	<ul style="list-style-type: none"> <li>Abuja Environmental Protection Board (AEPB)</li> </ul>



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S/N	RAAMP-SU States	Institutions Responsible for Environmental Protection and Waste Management
		<ul style="list-style-type: none"><li>• Department of Parks and Recreation</li><li>• FCT Emergency Management Department</li></ul>

### 3.1.10 Rural Access and Road Agency (RARA)

The following States have signed the bills for creation of Rural Access and Road Agency (RARA) into law – Adamawa, Akwa Ibom, Bauchi, Ebonyi, Ekiti, Gombe, Kano, Kebbi, Kogi, Niger, Ogun, Ondo and Plateau States. States such as Abia, Jigawa, Katsina, Kwara, Osun and Sokoto whose bills are with their respective State House of Assemblies are engaging with State legislators for accelerated hearing to pass the bills into law. In addition, states such as Imo, Kaduna, and Oyo state have their draft bill with the Ministry of Justice for legal advice. The need to create these institutions is to ensure effective management, maintenance, and sustainable funding of rural roads. Anambra State does not have Rural Access Road Agency (RARA) and State Road Fund (SRF) as regards to RAAMP-SU project. The state however, has an agency called Anambra State Road Maintenance Agency (ARMA) that is responsible for remedial works on State Roads for easy accessibility and decongestion of traffic. Similarly, Enugu state has passed a bill and signed into law the State Road Maintenance Agency. It is called Enugu State Road Maintenance and Development Agency Law of 2022. The inauguration of the agency is pending. The Agency oversees both rural and urban roads.

## 3.2 International Treaties/Agreements/Conventions Applicable to the RAAMP-SU

These include:

- United Nations Framework Convention on Climate Change (UNFCCC) (1992)
- Bamako Convention on Ban on the Import into Africa and the Control of Transboundary Movement and Management of Hazardous Wastes within Africa (1991)
- Basel Convention on the control of Transboundary Movement of Hazardous Wastes and their Disposal (1991)
- Montreal Protocol on Substances that Deplete the Ozone Layer (1987)
- Vienna Convention on the Ozone Layer (1985)
- Convention on the Protection of the World Cultural and Natural Heritage (World Heritage Convention), Paris (1975)
- Convention on Conservation of Migratory Species of Wild Animals (1979)
- Convention to Regulate International Trade in Endangered Species of Fauna and Flora (CITES) (1973)
- Convention on the Conservation of Migratory Species of Wild Animals (CMS or Bonn Convention) (Signatory only) (1988)
- African Convention on the Conservation of Nature and Nature Resource (1968)
- Paris Agreement (2015)
- Convention on Oil Pollution Preparedness, Response, and Co-operation (1990)

### Relevant International Labour Organization (ILO) Instruments

- Convention concerning Safety in the use of Chemicals at Work (Entry into force: 04 Nov 1993) Adoption: Geneva, 77th ILC session (25 Jun 1990) - Status: Up-to-date instrument (Technical Convention)
- ILO Convention on the Safety of Chemicals at the Workplace, 1990 (No.170)
- Occupational Health Services Convention, 1985 (No.161)
- Occupational Safety and Health Convention (1981) and its Protocol of 2002
- Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187)

### 3.2.1 Gender Based Violence – Relevance, Legal and Policy Importance in Nigeria

#### 3.2.1.1 Nigeria Legal and Regulatory Framework on GBV

Nigeria's national government has taken steps to penalize and address GBV and SEA, although a clear leadership with the leverage to garner multi sectoral support to address this complex problem seems absent. The institutional

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champion of women's and children's rights and GBV issues within the government is the Federal Ministry of Women Affairs (FMWA). But it has limited influence on sectoral ministries who need to enforce policy, insufficient budgetary resources<sup>10</sup> and insufficient institutional capacity to enact its mandate. The regulatory framework to address GBV, SEA and VAC is uneven because the Nigerian legal system is plural, and different legal systems co-exist, namely, the statutory law, Sharia law in the northern regions, and customary law in rural areas. The simultaneous application of this three-tier system creates differentiated degrees of protection to women's and children's rights<sup>11</sup> which varies in every state and its enforcement is weak. There is a lack of clear mandates regarding which institutions oversee child protection and the design and implementation of violence prevention strategies and the provision of services. Insufficient budget allocation both at national and state levels, coupled with inadequately trained and staffed structures to provide social welfare, justice, education and health services that are women, child and survivor centred. While efforts to provide GBV survivors with basic response services are concentrated in the North East (NE) by international non-governmental organizations or the UN system, there are very limited government or non-governmental services in the rest of the country, those that exist are for the most part unregulated, uncoordinated and unpredictable.<sup>12</sup> This is aggravated by a generalized lack of trust of citizens, particularly women, in the criminal justice system to enforce the existing laws. Moreover, lack of awareness of laws and knowledge of rights, amidst a context dominated by social norms that legitimate the perpetration of abuse, stigma and underreporting, results in the consequent impunity of perpetrators, possible re-victimization of survivors and the reproduction of the cycle of violence. Two key national laws address GBV, the [Child Rights Act](#) (CRA, 2003), and the [Violence Against Persons Prohibition Act](#) (VAPP, 2015) which have been passed by all states except Kano, Katsina and Zamfara States. While CRA has been passed in 35 states including the Federal Capital Territory (FCT) except Gombe state, VAPP has been passed in 33 states in addition to the FCT. Where laws are domesticated, implementation remains weak as institutional capacities are weak (social welfare, police, family courts). In practice, the legal and judicial systems provide women and children with little protection against violence, and timely and adequate support services are scarce and often ill-equipped to respond to survivors' needs.

Nigeria has ratified or acceded to the core international human rights treaties and is a party to the major regional human rights instrument which obliged States to respect, protect and fulfil human rights of all persons within the territory and subject to the jurisdiction of the State, without discrimination. Rape may violate several human rights obligations enshrined in the instruments ratified by Nigeria and is also a form of gender-based violence and a brutal manifestation of violence against women, children and men. Also, bias and unfairness towards certain genders with regards to employment; promotion, privacy in using bathrooms or restrooms and granting of work-related benefits, may also communicate gender-based violence. As a State party to the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) and the Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa (the "Maputo Protocol"), Nigeria has made legally binding commitments to exercise due diligence to combat gender-based violence and discrimination and has signed international treaties as such. These include:

- Convention concerning the Prohibition and Immediate Action for the Elimination of the worst forms of Child Labour (2002)
- Discrimination (Employment and Occupation) Convention
- Equality of Treatment (Accident Compensation) Convention (1925)
- International Convention on the Elimination of All Forms of Racial Discrimination (1976)
- Optional Protocol to the Convention on the Rights of Persons with Disabilities (2007)
- The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) (1985),
- The Convention on the Rights of Persons with Disabilities (CRPD) (2012)
- The International Covenant on Civil and Political Rights (ICCPR) (2004);
- The International Covenant on Economic, Social and Cultural Rights (ICESCR) (2004)

### Regional Treaties Relevant to GBV, SEA, VAC and People Living with Disabilities

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<sup>10</sup> [UN Women](#) data from 2011.

<sup>11</sup> UN CEDAW 2017.

<sup>12</sup> UNICEF 2018.

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- Abolition of Forced Labour Convention (1957)
- Convention Against Torture & other Cruel, Inhuman or Degrading Treatment or Punishment (CAT) 2001
- Convention on the Rights of Persons with Disabilities (2007)
- The Convention on the Rights of the Child (CRC) (1990),
- The National Action Plan for the Implementation of United Nations Security Council Resolution 1325 (2009);
- The Protocol to the ACHPR on the Rights of Women in Africa (the “Maputo Protocol”) (2007).

Besides, Nigeria also has obligations to protect the environment through various commitments to the African Union, the Economic Community of West African States and the Commonwealth. It is also committed through relations with the European Community under the Lome IV Convention.

### 3.3 World Bank Environmental and Social Framework (ESF)

The World Bank Environmental and Social Framework sets out the Bank’s commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards that are designed to support Borrowers’ projects, with the aim of ending extreme poverty and promoting shared prosperity.

#### 3.3.1 Environmental and Social Standards (ESSs)

The Environmental and Social Standards (ESSs) set out the requirements for Borrowers relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the Bank through IPF. The standards will: (a) support Borrowers in achieving Good Industry and International Practice (GIIP) relating to environmental and social sustainability; (b) assist Borrowers in fulfilling their national and international environmental and social obligations; (c) enhance non-discrimination, transparency, participation, accountability and governance; and (d) enhance the sustainable development outcomes of projects through ongoing stakeholder engagement. The relevant ESSs to the project are:

ESS 1 Assessment and Management of Environmental and Social Risks and Impacts,  
ESS 2 Labour and Working Conditions,  
ESS 3 Resource Efficiency and Pollution Prevention and Management,  
ESS 4 Community Health and Safety,  
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement,  
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources,  
ESS 8 Cultural Heritage,  
ESS10 Stakeholder Engagement and Information Disclosure

#### 3.3.2 Comparison of the Nigeria EIA Act CAP E12 LFN 2004 and the World Bank ESF

The Environmental Impact Assessment Act CAP E12 LFN 2004 requires that development projects be screened for their potential impact. Based on the screening, a full, partial, or no Environmental impact Assessment may be required. Projects are classified under any of the three categories as follows:

- Category I projects will require a full Environmental Impact Assessment (EIA).
- Category II projects may require only a partial EIA, which will focus on mitigation and Environmental planning measures, unless the project is located near an environmentally sensitive area--in which case a full EIA is required.
- Category III projects are considered to have “essentially beneficial impacts” on the environment, for which the Federal Ministry of the Environment will prepare an Environmental Impact Statement.

Whereas based on the ESF, the Bank will require the Borrower to carry out appropriate environmental and social assessment of subprojects, and prepare and implement such subprojects, as follows:

- a) **High Risk** subprojects, in accordance with the ESSs;
- b) **Substantial Risk, Moderate Risk and Low Risk** subprojects, in accordance with national law and any requirement of the ESSs that the Bank deems relevant to such subprojects. The environmental and social

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assessment will be proportionate to the risks and impacts of the project. It will inform the design of the project and be used to identify mitigation measures and actions, and to improve decision making.

The Bank will review the risk classification assigned to the project on a regular basis, including during implementation, and will change the classification where necessary, to ensure that it continues to be appropriate. Any change to the classification will be disclosed on the Bank's website. It is noteworthy to state that if the Bank is not satisfied that adequate capacity exists on the part of the Borrower, all High Risk and, as appropriate, Substantial Risk subprojects will be subject to prior review and approval by the Bank until it is established that adequate capacity exists. RAAMP-SU is classified as a Moderate Risk project.

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### 3.4 Gap Analysis of World Bank Requirements and National Laws

A Gap analysis of the World Bank Requirements and National Laws is provided in Table 6 below.

**Table 6: Gap Analysis of World Bank Requirements and National Laws**

ESSs Relevant to RAAMP-SU	Key Element	Nigerian Provisions	WB ESS	WB EHSGs	Gap Analysis
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts	ESMF for Programs involving multiple but still unidentified sub-projects.	Not a national requirement	This ESS describes the ESMF as an instrument that examines the risks and impacts when a project consists of a program and/or series of subprojects, and the risks and impacts cannot be determined until the program or subproject details have been identified.	N/A	Nigeria currently has a comprehensive framework for assessing and managing the environmental impacts of development projects. However, in comparison with the World Bank ESS1, the Nigeria framework lacks the provisions for the preparation of a specific E&S framework/guideline for projects/programs consisting of multiple subprojects/intervention works such as the ESMF used in Bank funded projects, which ideally should guide the preparation of E&S instruments where project locations, scale, design, etc. are known (such as ESMPs, ESIsAs, etc.). In this regard, the Bank's ESF is more appropriate for RAAMP-SU implementation as it requires that an ESMF specific for the RAAMP-SU as a whole be prepared, especially at this early stage where scale, type, location, etc. of subprojects are unknown.
	Screening	EIA Act Cap E12 LFN 2004 – Part II, Section 15(a); EIA Procedures and Charges, 2021; Sections 4&5. This states that upon receipt of the project proposal and the completed EIA registrations from the proponent, the Ministry shall carry out an Initial Environmental Examination (IEE) (i.e. Screening) and assign the project or activity into category I, II, or III project.	Mandates that subprojects be screened to ascertain their eligibility for E&S assessment.	N/A	Essentially, there is no difference between the Nigerian E&S framework and the WB ESF as both require that subprojects be screened to ascertain their eligibility for environmental and social assessment.
	Environmental Categorization	The Environmental Impact Assessment Act CAP E12 LFN 2004. Projects are classified under any of the three categories as follows: • Category I • Category II • Category III	Environmental and Social Risk Classification  a) High Risk b) Substantial Risk, c) Moderate Risk and d) Low Risk	N/A	The Act proposes the categorization for projects eligible for EIA mainly on the extent of the potential impacts, their magnitude, spread, range and reversibility. This, however, varies from the Environmental and Social Risk Classification of the Bank, which rather follows a risk-based approach.



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ESSs Relevant to RAAMP-SU	Key Element	Nigerian Provisions	WB ESS	WB EHSGs	Gap Analysis
	Environmental and Social Assessment	<p>EIA Act Cap E12 LFN 2004. The EIA Act sets out the general principles, procedures and methods of environmental impact assessment in various sectors; it mandates that development sub-projects or activities undertaken by public and private sector establishments with the potential to impact adversely on the environment must undergo Environmental Impact Assessment (EIA) following their categorization (category I or II)</p> <p>EIA Procedures and Charges, 2021 –Sector 12; Transportation – Rural Feeder Roads</p>	Requires that where there is a likelihood for adverse potential E&S risks and impacts for projects receiving funding through IPF, an E&S assessment is conducted to identify, assess, and manage such risks and impacts. Additionally, the assessment should include mitigation measures and a monitoring plan so as to achieve satisfactory E&S performance of the project.	<p>N/A</p> <p>Industry Sector Guidelines for Infrastructure – Toll Roads (2007)</p>	<p>This is in tandem with ESS 1, which sets out the Borrower’s responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing.</p> <p>The major gap between both provisions, is that the Nigerian provisions approach E&amp;S assessment prior to project implementation, majorly through the EIA instrument. Whereas the ESF describes several types of E&amp;S assessments to be prepared pending on the scale, magnitude, nature, type, location, design etc. of the project (E.g. ESMF, ESIA, ESMP, HRAs etc.). This allows for more flexibility and better application of E&amp;S instruments such that the concept of proportionality of the type of E&amp;S assessment and the potential adverse E&amp;S risks and impacts of the project(s) is taken into perspective.</p> <p>The EIA Procedures and Charges (2021) compare to the Bank’s ESS 1 requirements and the World Bank Group Environmental, Health and Safety Guidelines (EHSGs), which provide provisions to support the ESSs broadly, and also with specifics to the industry(s) in question. The major gap between the Nigerian provisions and the WB ESF in this regard, is that where the EIA procedures and charges (2021) for the transport sector lists i) rural feeder roads, ii) New Highways, iii) Highways (rehabilitation) and iv) Township Roads as subsectors; without emphasizing further details on important aspects to be considered during the E&amp;S assessment; the WB EHSGs particularly the Industry Sector Guidelines for Infrastructure – Toll Roads (2007), provides clearer details on aspects to be considered during road construction such as siting, existing vegetation, topographic features, waterways, and threatened or endangered species etc.</p> <p>These provide clarity to aid in better preparation of site-specific E&amp;S instruments. Furthermore, the parent project prepared a Low Volume Road Manual, which may be useful in the implementation of RAAMP-SU.</p>
ESS 2 Labour and Working Conditions	Labour Conditions	<p>Employee Compensation Act, 2010</p> <p>Labour Act, 2004</p> <p>The Factories Act, CAP F1, LFN, 2004</p>	ESS 2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Encourages the promotion of sound worker-management relationships and enhances benefits of a project by treating workers in the project fairly and providing safe and healthy working	N/A	Broadly, there is no difference between the Nigerian provisions and ESS 2, except for the fact that ESS 2 requires that a grievance mechanism be provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against any reprisal for its use. In compliance to the requirements of ESS 2, RAAMP-SU has prepared an LMP which contains a GRM for the work force. This shall be stepped down to the states when implementation of subprojects/intervention works commence.

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ESSs Relevant to RAAMP-SU	Key Element	Nigerian Provisions	WB ESS	WB EHSGs	Gap Analysis
	Health and Safety	Guidelines for the implementation of the Revised National Policy on Occupational Safety and Health (Revised), 2020	conditions	General EHSGs, Section 4.2	The Nigerian guidelines do not address Occupational Health and Safety (OHS) sectorally. Currently, the OHS sector-specific guidelines are being developed by the Federal Ministry of Labour and Employment (FMLE), therefore there are no specific guidelines from the national provisions that can be applied directly to RAAMP-SU considering its PDO. This implies that the requirements of ESS 2 and the EHSGs Section 4.2 including the Industry Sector Guidelines for Infrastructure – Toll Roads (2007), Section 1.2 & 2.2 (Occupational Health and Safety) shall prevail in this instance and guide RAAMP-SU implementation.
<b>ESS 3</b> Resource Efficiency and Pollution Prevention and Management	Pollution Prevention and Control	National Guideline and Standard for Environmental Pollution Control, 1991  National Environmental Protection (Pollution Abatement in Industries and Facilities Generating Wastes) Regulations, 1991;  National Environmental (Surface & Groundwater Quality Control) Regulations 2011	ESS3 recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels.	General EHSGs	Essentially, there is no difference between the main frameworks for both policies.
<b>ESS 4</b> Community Health and Safety	Community Health and Safety  Emergency Response  Security Risks	Section 19 of the EIA Act Cap E12 LFN 2004.  Section 19 of the EIA Act addresses the requirement for an Environmental Impact Assessment report to include measures for the protection of the environment and public health and safety	ESS4 recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. Communities that are already subjected to impacts from climate change may also experience an acceleration or intensification of impacts due to project activities.  Addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of Borrowers to avoid or minimize	General EHSGs Section 3  Industry Sector Guidelines for Infrastructure – Toll Roads (2007) – Section 1.3	While Section 19 of the EIA Act may not explicitly mention “community safety”, the provisions within Section 19 encompass aspects such as the assessment and mitigation of potential hazards and risks to communities arising from proposed projects or activities. This includes measures to prevent or minimize adverse impacts on the health and safety of nearby communities, as well as provisions for emergency response planning and management. However, the WB ESS4 provides a more robust framework for community health and safety and thus will be adopted.

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ESSs Relevant to RAAMP-SU	Key Element	Nigerian Provisions	WB ESS	WB EHSGs	Gap Analysis
			such risks and impacts.		
<b>ESS 5</b> Land Acquisition, Restriction on Land Use and Involuntary Resettlement	Compensation  Livelihood Restoration  Grievance Redress Mechanism	Nigerian Land Use Act, 1978).  The Part 1 of the amended Act 2004 vests all land within the urban areas of any Nigerian State in the Executive Governor of that state. Land within the rural areas of the state is vested on the Local Government. The Part VI, Section 29 of the law provides for compensation to the holder of any land title when such land is to be acquired for public purposes. For developed land, the Governor (in the case of urban areas) or Local Government (in the case of rural areas) may, in lieu of compensation, offer resettlement in any other place as a reasonable alternative accommodation and in acceptance of resettlement, the holder's right to compensation shall be deemed to have been duly satisfied. Although the Land Use Act is not strictly an Act for environmental protection, protection of the environment is one of the considerations which a holder of certificate of occupancy has to observe.	Key objective of ESS 5 is to avoid or minimize involuntary resettlement where feasible, exploring all viable alternative project designs; assist displaced persons in improving their former living standards, income earning capacity and production level, or at least in restoring them; encourage community participation in planning and implementing resettlement; and provide assistance to affected people regardless of the legality of land tenure. The policy covers not only physical relocation, but any loss of land or other assets resulting in relocation, or loss of shelter; loss of assets or access to assets; loss of income sources or means of livelihood whether or not the affected people must move to another location.	N/A	Broadly, there are some similarities between the Land Use Act of 1978 and ESS 5, for instance, in the area of compensation. Importantly, where RAAMP-SU implementation may result in physical or economic displacement, the project shall address this through compensation where recommended and livelihood restoration programs, which are described in the Resettlement Policy Framework (RPF) for RAAMP-SU and shall be applied in RAPS where required to be prepared by the states. The Nigerian regulations do not provide for livelihood restoration programs. Furthermore, where the land use act recognises the setup of an allocation committee appointed by the Governor to handle disputes/grievances and compensation matters, ESS 5 requires that a GRM be set early constituting the representatives of PAPs and preference for local redress mechanism.
<b>ESS 6</b> Biodiversity Conservation and Sustainable Management of	Protected Areas  Natural Reserves	Forestry Law CAP 51 LFN 1994  Endanger Species (Control of International Trade and Traffic)	ESS 6 recognizes that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development.	N/A	Essentially, there is no difference between the Nigerian provisions and ESS 6.

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ESSs Relevant to RAAMP-SU	Key Element	Nigerian Provisions	WB ESS	WB EHSGs	Gap Analysis
Living Natural Resources		Act CAP E9 LFN 2004  Natural Resources Conservation Act CAP 268 LFN 1990	ESS 6 recognizes the importance of maintaining core ecological functions of habitats, including forests, and the biodiversity they support.		
<b>ESS 8</b> Cultural Heritage	Cultural Heritage (Tangible and Intangible)	National Cultural Policy, 1988  National Commission for Museums and Monuments Act, 1990	The Bank seeks to assist countries to manage their physical cultural resources and avoid or mitigate adverse impact of development projects on these resources. This policy is triggered for any project that requires an EA.	N/A	The National Cultural Policy (1988) sets directions for affirmation of authentic cultural values and cultural heritage; building up of a national cultural identity and parallel affirmation of cultural identities of different ethnic groups. On the other hand, the National Commission for Museums and Monuments Act of 1990 seeks to protect and preserve any objects of archaeological interest wherever they may be found. Both national provisions correspond with the requirements of ESS 8. However, ESS 8 presents a more robust set of requirements and application in development projects such that it seeks to: <ul style="list-style-type: none"> <li>• Protect cultural heritage from the adverse impacts of project activities and support its preservation.</li> <li>• Address cultural heritage as an integral aspect of sustainable development.</li> <li>• Promote meaningful consultation with stakeholders regarding cultural heritage.</li> <li>• Promote the equitable sharing of benefits from the use of cultural heritage.</li> </ul>
<b>ESS10</b> Stakeholder Engagement and Information Disclosure	Disclosure and Access to Information	EIA Act Cap E12 LFN 2004  The EIA Act recognises the usefulness of stakeholder engagement (public consultation) in the environmental and social assessment process. Importantly, it describes the need for community engagement, stakeholder sensitization and awareness and the need for stakeholder input in the disclosure process.	This ESS recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice.	N/A	Both national provisions and ESS 10 are similar in terms of objectives as regards development projects. However, ESS 10 provides a more robust set of requirements and application which emphasises the need for stakeholder engagement to be a continuous and participatory process. RAAMP-SU will achieve sustainable stakeholder engagement through the implementation of the SEP and Stakeholder engagement provisions which will be provided for in subsequent E&S instruments to be prepared by the states. Additionally, the law emphasizes that EIAs be disclosed to the public for a period of 21 days for the purpose of access to information. The requirements of ESS 1 and ESS 10 likewise are consistent with information disclosure for environmental and social assessments to stakeholders (Interested parties and Project Affected Persons).

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The World Bank Group Environmental, Health and Safety Guidelines (EHSGs), also provides provisions to support the ESSs. The Environmental, Health and Safety Guidelines<sup>13</sup> are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). When one or more members of the World Bank Group are involved in a project, these EHS Guidelines are applied as required by their respective policies and standards. These General EHS Guidelines are designed to be used together with the relevant Industry Sector EHS Guidelines which guide users on EHS issues in specific industry sectors. For complex projects, use of multiple industry-sector guidelines may be necessary.

The Bank developed Good Practice Notes (GPN) that the Borrower is obliged to apply appropriate level of performance or measures referred to in the GPN for the subproject activities during preparation of subproject documentation as well as during its implementation.

### Good Practice Notes

- World Bank, Good Practice Note Environment & Social Framework for IPF Operations, Non- discrimination and Disability, 2018,
- World Bank, Good Practice Note, Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works, 28 September 2018,
- World Bank, Good Practice Note: Assessing and Managing the Risks and Impacts of the Use of Security Personnel, October 2018,
- World Bank, Good Practice Note: Environment & Social Framework for IPF Operations Road Safety, October 2019
- World Bank, Good Practice Note: Environment & Social Framework for IPF Operations Non-discrimination: Sexual Orientation and Gender Identity (SOGI), October 2019.

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<sup>13</sup> [www.ifc.org/ifcext/enviro.nsf/Content/EnvironmentalGuidelines](http://www.ifc.org/ifcext/enviro.nsf/Content/EnvironmentalGuidelines)



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### 3.5 Application of World Bank Policies, Actions and Rules on RAAMP-SU components and their Classification

The Application of World Bank Policies, Actions and Rules on RAAMP-SU components and their Classification is provided in Table 7 below.

**Table 7: Application of World Bank Policies, Actions and Rules on RAAMP-SU components and their Classification**

World Bank Policies, Actions and Rules	RAAMP-SU Components	Application in Respective Component	Classification
World Bank Environmental and Social Policy for IPF	<b>Component A:</b> Improvement of Resilient Rural Access	Particularly, the WB Environmental and Social Policy for IPF sets out the mandatory requirements of the Bank in relation to the projects it supports through IPF. Furthermore, this policy establishes the ESSs (1-10) which apply to all projects funded through IPF. However, as in the case of RAAMP-SU, some ESSs may be more relevant depending on the design of the project. When considering Component A, Sub-Component A1, the provisions of this policy see that the requirements of all ESSs relevant to RAAMP-SU implementation (ESSs 1-6; 8 & 10) and particularly those of ESSs 1 & 10 are applied to the activities summarised in the Sub-Component which may or are likely to require civil works (Upgrade of 3000km rural roads, Rehabilitation works - climate resilience and flood protection measures, such as repairing, and strengthening of old bridges and culverts, slope stabilization, erosion protection improvements, surface repairs). This policy mandates that for IPF projects where civil works shall be carried out; an environmental and social assessment should be prepared in order to assess and manage the potential adverse environmental and social risks and impacts. In this context, the policy while applying generally to RAAMP-SU as a whole will be emphasized in the implementation of sub-component A1 through the preparation of requisite E&S assessment which shall be proportionate to the envisaged adverse E&S risks and impacts. In addition, the Bank has conducted its own due diligence of proposed project activities in proportion to the nature and potential significant of E&S risk and impacts. Supportively, the SEP shall guide stakeholder engagement throughout implementation of component A.	Classification for E&S risks is Moderate Risk.
World Bank Climate and Disaster Risk Screening Tools		The project has been screened for climate change and disaster impacts and specific potential resilience enhancing measures will be identified and properly reflected in project documents before appraisal. The assessment will identify potential disaster and climate risks (current and future) and will be used to inform the project design. Resilience enhancing measures such as stormwater drainage infrastructure for flood protection and cost-effective structural and nature-based adaptation measures that reduce flood and extreme heat risks will be integrated in the project design to ensure that the residual risk to adaptation is low (i.e., acceptable), and will be integrated in the PAD.	Dependent of the results of the WB Climate and Disaster Risk Screening Tools.
World Bank Action Plan on Climate Change Adaptation and Resilience		This Action Plan is designed to help countries “plan differently.” By looking across the full range of barriers to climate adaptation, it will help countries to go beyond climate-smart projects to designing and building systemic resilience to climate-related risks. It aims to change incentives and ensure better information and decision making to reduce the scale of investments needed for adaptation, and to reduce the risk of maladaptation (poorly designed projects or policies becoming uneconomic in the face of worsening climate change). RAAMP-SU will satisfy all relevant climate corporate requirements. However, only the climate disaster risk screening and preliminary Paris Alignment risk assessment is presented in the Concept Note for RAAMP-SU.	

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World Bank Policies, Actions and Rules	RAAMP-SU Components	Application in Respective Component	Classification
<p>World Bank Standard Procurement Document (SPD)</p> <p>World Bank Procurement Regulations for IPF Borrowers - Goods, Works, Non-Consulting and Consulting Services (September, 2023)</p> <p>Guidelines on Preventing and Combating Fraud and Corruption in Projects Financed by IBRD Loans and IDA Credits and Grants, (October 15, 2006)</p>		<p>This SPD reflects the World Bank's Procurement Regulations for IPF Borrowers (Procurement Regulations). The SPD is applicable to the Procurement of Goods and Services funded by IBRD or IDA financed projects whose Legal Agreement makes reference to the Procurement Regulations. Particularly for Component A2, the SPD shall apply to bidding documents for project related activities. This shall include procurement procedures for consultants, contractors etc. This implies that states through the SPIUs will use the SPD during their procurement procedures. Similarly, the FPMU shall apply same for procurement functions under its portfolio.</p>	<p>Dependent of the results of the Systematic Operations Risk Rating Tool (SORT)</p>
<p>World Bank Environmental and Social Policy for IPF</p> <p>World Bank Best Practices for Rural Road Maintenance and Improvement</p>	<p><b>Component B:</b> Climate Resilient Asset Management</p>	<p>Application of the WB Environmental and Social Policy for IPF under Component B1 (maintenance of 3,500 km of rural roads) is similar as in the case of Component A1 above.</p> <p>The Best Practices recommend that Rural Road Maintenance Strategies should clarify the ownership of rural roads, and the responsibilities of various institutions for development, maintenance and priority-setting. RAAMP-SU is positioned to achieved this through the implementation and adoption of NITRIMS by RARAs at the state levels. RARAs will provide states with an opportunity to access funds from development partners. It also recommends that Rural Road Strategies address the overall level of funding for rural roads, and the balance between development, rehabilitation and maintenance. This is applicable in RAAMP-SU in that SFR (which will provide an independent source of additional funding for road maintenance) captured under Sub-Component B2 is a requirement for states intending to participate in RAAMP-SU. Furthermore, technical assistance, training of institutions involved in road maintenance, funding, supervision is required under the best practices. Similarly, this is captured in the planned implementation of Component B.</p>	<p>Classification for E&amp;S risks is Moderate Risk.</p>
<p>World Bank Guidance Note on Project Management</p> <p>World Bank Capacity Development Results Framework (CDRF or the Framework)</p>	<p><b>Component C:</b> Institutional Strengthening and Project Management</p>	<p>The Guidance Note proposes that organizational structures for project management should be responsible and accountable for implementation of the project and for timely progress and expenditure reporting that adheres to Bank policies and guidelines. In this light, it is imperative that the RAAMP-SU implements the provisions of the guidance notes and as well their borrows from lessons learnt in the implementation of the parent project in order to support and improve its project management and risk mitigation approaches under Sub-Component C1 &amp; C2.</p> <p>The Capacity Development Results Framework (CDRF or the Framework) is a powerful new approach to the design, implementation, monitoring, management, and evaluation of development programs. Originally conceived to address well-documented problems in the narrow field of capacity development,</p>	<p>Overall project risks is Moderate based on the Systematic Operations Risk Rating Tool (SORT).</p>

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World Bank Policies, Actions and Rules	RAAMP-SU Components	Application in Respective Component	Classification
<p>World Bank Good Practice Note - Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Human Development Operations</p> <p>World Bank Consultation Guidelines</p>		<p>the Framework can be profitably applied to assess the feasibility and coherence of proposed development projects, to monitor projects during implementation (with a view to taking corrective action), or to assess the results, or even the design, of completed projects. This is applicable to RAAMP-SU being that it is a project receiving funding from the Bank, it is beneficial for the framework to be a backbone in implementation of Component C especially C1 (project operating costs, training, project monitoring and impact evaluation activities, TA consultancies etc). The provisions of the framework can assist RAAMP-SU especially in its implementation arrangements when applied as a step-by-step guide to the planning, implementation, and evaluation of its subprojects and activities. Complimentarily, the framework will be useful in the design of capacity building programs to support RAAMP-SU implementation at the national (FPMU and Federal stakeholders) and state levels (SPIUs, RARAs and other relevant agencies).</p> <p>Under the parent project some states had conducted mapping out of service providers for GBV response. This likewise will be continued in the RAAMP-SU. Importantly, Sub- Component C 2 which will support project risk mitigation activities including third party monitoring for sexual exploitation and abuse (SEA), gender, grievance redressal and rural road safety of rural roads will see to the application of this GPN through the GBV Action Plan which has been prepared for RAAMP-SU. Importantly, the GBV Action Plan which references Code of Conduct for contractors and Accountability and Response Framework and GBV related GRM.</p> <p>The WB Consultation Guidelines generally highlights the Consultation Principles of: Openness, Access to Information, Accountability, Transparency, Visibility, and Accessibility. The institutions involved in the implementation of RAAMP-SU are not new to the Banks position on consultations or stakeholder engagement. RAAMP-SU will build on consultation approaches from the parent project and on the SEP prepared for its implementation. Importantly, stakeholder engagement/consultations will be implemented continuously throughout the project life cycle.</p>	
<p>Global Facility for Disaster Reduction and Recovery (GFDRR) Strategy 2021–2025</p>	<p><b>Component D:</b> Contingent Emergency Response</p>	<p>RAAMP-SU may borrow and apply the GFDRR Strategy in its implementation and in particular to Component D in addressing emergency needs (officially declared natural disasters) as agreed with the GoN. Coordination with Federal and State agencies such as NEMAs and SEMAs will be essential for responding to natural disasters associated with project implementation. Broadly, the strategy describes priority areas of engagement in the event of a disaster. This includes as follows:</p> <ul style="list-style-type: none"> <li>• Priority Area One: Risk-Informed Decision Making</li> <li>• Priority Area Two: Reducing Risk and Mainstreaming Disaster Risk Management</li> <li>• Priority Area Three: Financial Preparedness to Manage Disaster and Climate Shocks</li> <li>• Priority Area Four: Disaster Preparedness and Resilient Recovery</li> </ul> <p>The GFDRR strategy also identifies Cross Cutting Priority Areas, which should be considered in the context of the project as well as the need to strengthen partnerships in the approach to responding to disaster risks as well as monitoring and evaluation and learning from experiences.</p>	<p>Dependent of the results of the WB Climate and Disaster Risk Screening Tools.</p>

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### 3.6 Applicability of the Environmental and Social Standards (ESSs) to RAAMP-SU

The Applicability of the Environmental and Social Standards (ESSs) to RAAMP-SU is provided in Table 8 below.

**Table 8: ESSs Relevant to RAAMP-SU**

S/N	Environmental and Social Standards (ESSs)	Relevance to RAAMP-SU	How the project complies with the Standards.
1	<b>ESS 1</b> Assessment and Management of Environmental and Social Risks and Impacts	ESS 1 sets out the Borrower's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project. The assessment of E&S risks determines the specific ESSs relevant to RAAMP-SU. Furthermore, with regards to RAAMP-SU, activities involving upgrade of about 3,000 km of rural roads, repairing, and strengthening of old bridges and culverts, slope stabilization, erosion protection improvements, surface repairs or resurfacing and other engineering solutions (Component A; Sub-Component A.1), civil works relating to maintenance of 3,500 km of rural roads (Component B; Sub-Component B.1); resulting in the subsequent release of fugitive dust, increase in noise, changes in air quality due to exhaust emissions from in-use vehicles and equipment, generation of wastes, oil leakages from ancillary equipment etc. may pose potential environmental and social risks and impacts.	In this regard, environmental and social assessment(s) which should be proportionate to the identified risks and impacts of proposed interventions will be carried out under the RAAMP-SU following an environmental and social screening process.
2	<b>ESS 2</b> Labour and Working Conditions	The applicability of ESS 2 is established during the environmental and social assessment process (ESS 1). From the Bank's perspective, projects receiving IPF should promote safety and health at work, fair treatment, non-discrimination and equal opportunity of project workers; including the protection of vulnerable workers such as women, persons living with disabilities, migrant workers, contracted workers, community workers, primary supply workers and children (of working age, in accordance with this ESS and national Child Labour Laws), as appropriate etc. More so, considering the types of workers to be involved in the RAAMP-SU implementation such as FPMU personnel, SPIU staff, Contractors, Consultants, Skilled and Unskilled labour (in the prospective states) the applicability of ESS 2 to RAAMP-SU is established, in that the ESS provides for a number of requirements to be met when labour is involved as well as to meet working conditions. These requirements also affect RAAMP-SU and in summary include working conditions and management relationships, grievance redress, etc. Also, considering the substantial labour requirements expected during the implementation of RAAMP-SU in the prospective states, it is crucial to establish OHS measures. These measures are designed to protect project workers from injuries, illnesses, or any negative impacts resulting from exposure to hazards encountered during the implementation of RAAMP-SU. Such measures take into account the requirements of ESS2 and national law requirements on OHS and workplace conditions as they apply to the project. Furthermore, the influx of workers and service providers for the project into communities may lead to an increase in a spectrum of unacceptable and/or illicit behavior, ranging from unwanted aggressive advances and Sexual Harassment (SH) to Sexual Exploitation and Abuse (SEA), particularly of women and children. As part of ESS 2 requirements, Contractors' to be engaged for RAAMP-SU implementation at the prospective states will be mandated to sign the Workers' and Managers' Code of Conduct on SEA/SH prior to the commencement of civil works to manage issues related to Gender Based Violence (GBV) and Violence Against Children (VAC) during the project.	Importantly, it is noteworthy to state that a <b>Labour Management Procedure (LMP)</b> for RAAMP-SU has been prepared as a Stand-alone document. RAAMP-SU shall address labour issues by implementing provisions of the LMP.
3	<b>ESS 3</b> Resource Efficiency and Pollution	The objectives of ESS 3 aim to promote the sustainable use of resources, including energy, water and raw materials. Additionally, it aims to minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities. Sub-projects involving repairing,	RAAMP-SU will address the requirements of ESS3 in the environmental and social assessments to be prepared by

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S/N	Environmental and Social Standards (ESSs)	Relevance to RAAMP-SU	How the project complies with the Standards.
	Prevention and Management	and strengthening of old bridges and culverts, slope stabilization, erosion protection improvements, surface repairs or resurfacing and other engineering solutions, maintenance of 3,500 km of rural roads, etc. to be carried out under RAAMP-SU are likely to result in waste generation, sediment laden runoff, generation of harmful atmospheric emissions such as Volatile Organic Compounds (VOCs) from petroleum-based materials such as asphalt and bitumen. Although the types of wastes are not fully known at this stage of project conceptualization; pollution prevention and management are foreseeable and therefore a critical aspect of RAAMP-SU activities. The applicability of ESS 3 is established in the environmental and social assessment.	the SPIUs for eligible subprojects/intervention works. Additionally, Contractors shall prepare a Contractor's Environmental and Social Management Plan (CESMP) which shall include steps and procedures for managing waste generated during implementation activities as well as activities directed at achieving resource efficiency.
4	<b>ESS 4</b> Community Health and Safety	In line with ESS 4, RAAMP-SU project activities may increase community exposure to risks and impacts such as traffic (including access restrictions particularly during the construction phase), noise, exposure to toxic fumes and hazardous materials, risk of accidents, security risks and SEA/SH. The rural roads cut across Local Government Areas (LGAs) and senatorial districts within the states which are characterized by settlements, communities, economic activities etc. Sub-project activities requiring civil works will necessitate labour influx (increasing the likelihood of GBV risks), accidents, increase community risks due to creation of borrow pits, draw attention of hoodlums and delinquents, foreseen <sup>14</sup> and unforeseen <sup>15</sup> emergencies. The applicability of ESS 4 is established during the environmental and social assessment as described in ESS 1.	RAAMP-SU will address the requirements of ESS 4 in the environmental and social assessments to be prepared by the SPIUs for eligible subprojects/intervention works. Additionally, Contractors shall prepare CESMP which shall include steps and procedures for addressing community health and safety issues that may be associated with the project
5	<b>ESS 5</b> Land Acquisition, Restriction on Land Use and Involuntary Resettlement	ESS 5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons. Particularly as concerns RAAMP-SU land acquisition is likely, especially where carriageways/ Right of Ways (ROWs) of rural roads will need to be reclaimed during repairing, and strengthening of old bridges and culverts, slope stabilization, erosion protection improvements, surface repairs or resurfacing, maintenance of 3,500 km of rural roads, etc. Such activities are likely to result in physical and economic displacement, and restriction of access to livelihoods activities, which in turn may disrupt livelihoods. The provisions of ESS5 require that these are avoided, reduced, mitigated and where these are not possible, compensation be done. The applicability of ESS5 is established during the environmental and social assessment described in ESS1.	The RAAMP-SU has prepared a stand-alone <b>Resettlement Policy Framework (RPF)</b> specifically to address issues of land acquisition, restriction on land use and involuntary resettlement associated with RAAMP-SU implementation. Subsequently, states will prepare Resettlement Action Plans (RAPs) for subprojects/intervention works which have been screened to result in physical and economic displacement.
6	<b>ESS 6</b> Biodiversity Conservation and Sustainable Management of Living Natural Resources	ESS 6 recognizes the importance of maintaining core ecological functions of habitats, including forests, and the biodiversity they support. Although the exact locations where intervention works will be undertaken are unknown, the proposed sub-projects may impact on natural resources such as vegetation, water resources and land resources etc. The applicability of ESS 6 is established during the environmental and social assessment as described in ESS 1.	RAAMP-SU will address the requirements of ESS 6 in the environmental and social assessments to be prepared by the SPIUs for eligible subprojects/intervention works. Also, depending on the nature of the environment where intervention works shall be undertaken at the prospective states, it may also be necessary

<sup>14</sup> **Foreseen emergencies** refer to situations or events that are anticipated or expected to occur, often as a result of known risks or hazards. These emergencies are typically part of the planning process, and measures can be taken in advance to mitigate their impact or respond effectively when they occur.

<sup>15</sup> **Unforeseen emergencies** are unexpected or unplanned events that arise suddenly and without warning. These emergencies may not have been anticipated during the planning phase, making it challenging to prepare for them in advance.



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S/N	Environmental and Social Standards (ESSs)	Relevance to RAAMP-SU	How the project complies with the Standards.
			for a biodiversity assessment to be carried out and a Biodiversity Management Plan (BMP) developed as part of the E&S assessment to be done by the SPIUs.
7	<b>ESS 8</b> Cultural Heritage	This ESS sets out general provisions on risks and impacts to cultural heritage from project activities. There is a possibility for RAAMP-SU sub-projects involving civil works on rural roads to impact on tangible <sup>16</sup> and intangible <sup>17</sup> cultural heritage. The applicability of ESS 8 is established during the environmental and social assessment as described in ESS 1.	Depending on the significance of the E&S risks and impacts of subproject activities on cultural heritage; the environmental and social assessment to be prepared for sub-projects shall address Physical Cultural Resources through a <b>Physical Cultural Resource Management Plan (PCRMP)</b> and Chance Find Procedures where appropriate.
8	<b>ESS10</b> Stakeholder Engagement and Information Disclosure	ESS 10 applies to all projects funded by the Bank through IPF. At all levels of implementation of RAAMP-SU, a systematic approach to stakeholder engagement relevant to the project design, PDOs, and expected results is mandatory. Open and transparent engagement, recording suggestions and concerns; including assessing the level of stakeholder interest and support is essential for decision making at the institutional and administrative level of RAAMP-SU. This is critical throughout the program life cycle and is expected to extend even during project implementation. The application of ESS 10 to RAAMP-SU will provide the platform for participatory harmony, essential to the valued involvement of Interested Parties and Project Affected Persons (PAPs).	<b>A Stakeholder Engagement Plan (SEP)</b> for RAAMP-SU has been prepared as a Stand-alone document to guide project implementation.  Additionally, E&S instruments to be prepared by the states for subprojects/intervention works shall include a dedicated chapter to stakeholder engagement so as to guide stakeholder participation and relations throughout, and after subproject implementation.

<sup>16</sup> **Tangible cultural heritage**, which includes movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Tangible cultural heritage may be located in urban or rural settings, and may be above or below land or under the water;

<sup>17</sup> **Intangible cultural heritage**, which includes practices, representations, expressions, knowledge, skills—as well as the instruments, objects, artifacts and cultural spaces associated therewith that communities and groups recognize as part of their cultural heritage, as transmitted from generation to generation and constantly recreated by them in response to their environment, their interaction with nature and their history.

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# CHAPTER 4 – ENVIRONMENTAL AND SOCIAL BASELINE

## 4.1 Introduction

This Chapter describes the overall Environmental and Social baseline condition of Nigeria considering that the RAAMP-SU shall be implemented nationwide. Additionally, some state specific environmental and social peculiarities are also discussed in this chapter.

## 4.2 Physical Environment

Nigeria is located in West Africa, on the Gulf of Guinea between Benin and Cameroon. Nigeria has an area of 923,768 km<sup>2</sup>, including about 13,000 km<sup>2</sup> of water. Nigeria shares borders with Cameroon (1,690 km) in the East; Chad (87 km) in the North East; Niger (1,497 km) in the North and Benin (773 km) in the West. Nigeria's coastline along the Gulf of Guinea totals 853 km ("About Nigeria", September 2023). The country claims a territorial sea of 12 nautical miles, an exclusive economic zone of 200 nautical miles, and a continental shelf to a depth of 200 m or to the depth of exploitation. Nigeria is divided into thirty-six (36) states and one Federal Capital Territory. The 36 states are further sub-divided into 774 LGAs. Furthermore, the states are aggregated into six geopolitical zones namely: North West, North East, North Central, South West, South South, and South East. See Figure 3 below.

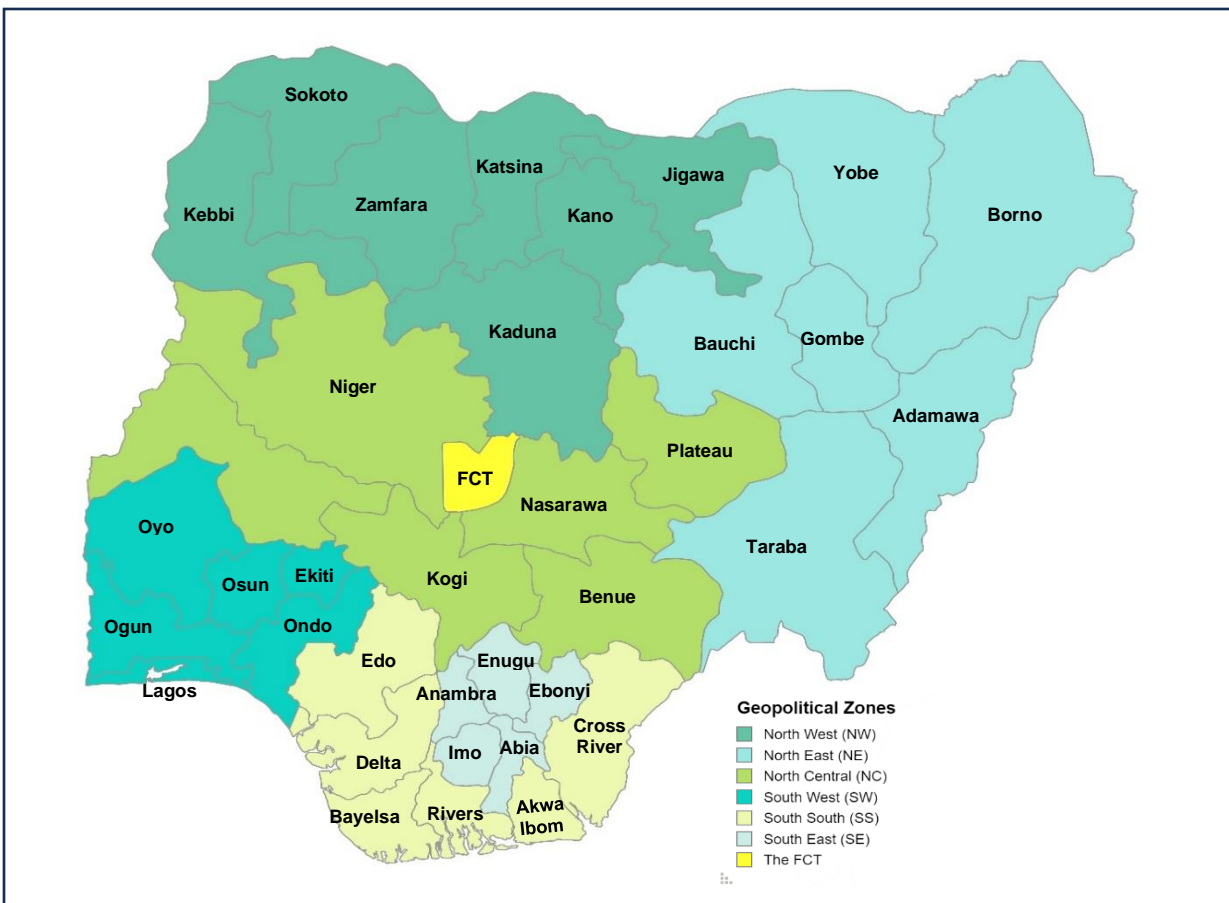


Figure 3: Map of Nigeria Showing the Geopolitical Zones – Source: BioDoc International

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### 4.2.1 Topography

Nigeria has five major geographic regions. A low coastal zone along the Gulf of Guinea<sup>18</sup>; hills and low plateaus north of the coastal zone<sup>19</sup>; the Niger–Benue River valley<sup>20</sup>; a broad stepped plateau stretching to the northern border with elevations exceeding 1,200 m<sup>21</sup>; and a mountainous zone<sup>22</sup> along the eastern border, which includes the country's highest point, Chappal Waddi (2,419 meters) (Source: Geography of Nigeria, 2022).

### 4.2.2 Hydrology

#### 4.2.2.1 Surface Water

There are many rivers in Nigeria but the two principal river systems are the Niger – Benue and the Chad. The Niger River, the largest in West Africa, flows 4,000 km from Guinea through Mali, Niger, Benin, and Nigeria before emptying into the Gulf of Guinea (the Niger River traverses Delta, Kogi, Kwara and Niger states). The Benue River and largest tributary flows 1,400 km<sup>23</sup> from Cameroon into Nigeria, where it empties into the Niger River (the Benue River traverses Adamawa, Benue, Nasarwa and Taraba states). The country's other river system involves various rivers that merge into the Yobe River, which then flows along the border with Niger and empties into Lake Chad (Nigeria Hydrological Services Agency 2018). Figure 4 below shows Nigeria's Hydrological Map.

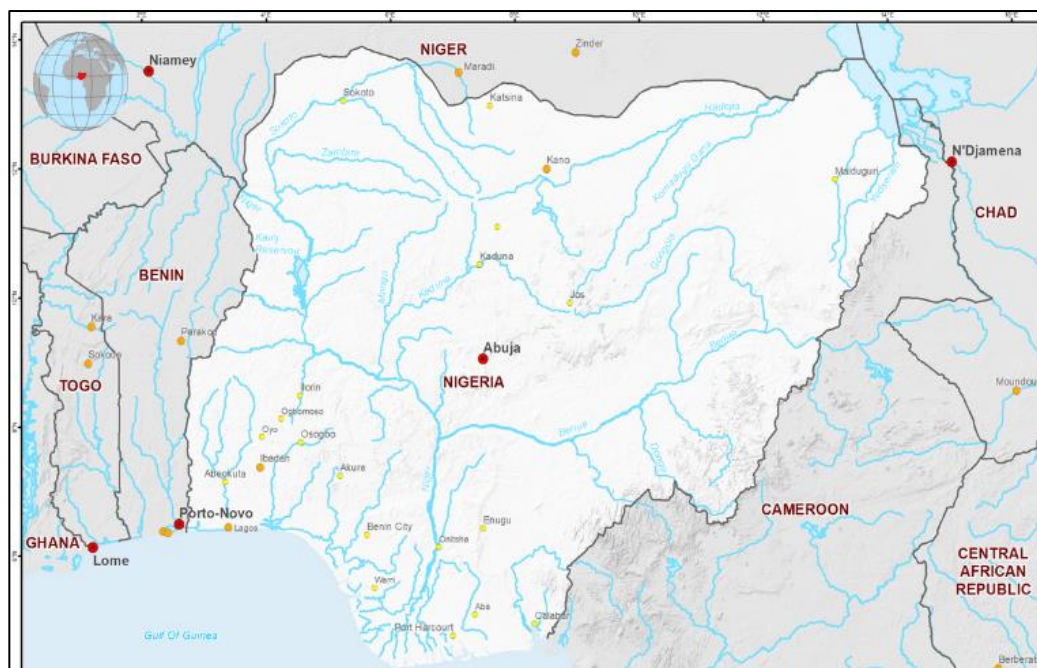


Figure 4: Nigeria Hydrological Map – Source: Nigeria Hydrological Services Agency (NIHSA)

<sup>18</sup> RAAMP-SU States along the Gulf of Guinea include: Akwa Ibom, Bayelsa, Cross River, Delta, Edo, Lagos, Ogun, Ondo, Edo, Delta, and Rivers States

<sup>19</sup> RAAMP-SU States in hills and low plateaus of the coastal zone: Bauchi, Benue, Kaduna, Kwara and Nasarawa states

<sup>20</sup> RAAMP-SU States in Niger-Benue valley: Anambra, Benue, Enugu and Kogi States

<sup>21</sup> Metres - m

<sup>22</sup> RAAMP-SU States in mountainous zones: Adamawa, and Taraba States

<sup>23</sup> Kilometres - km

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### 4.2.2.2 Ground Water/ Hydrogeology

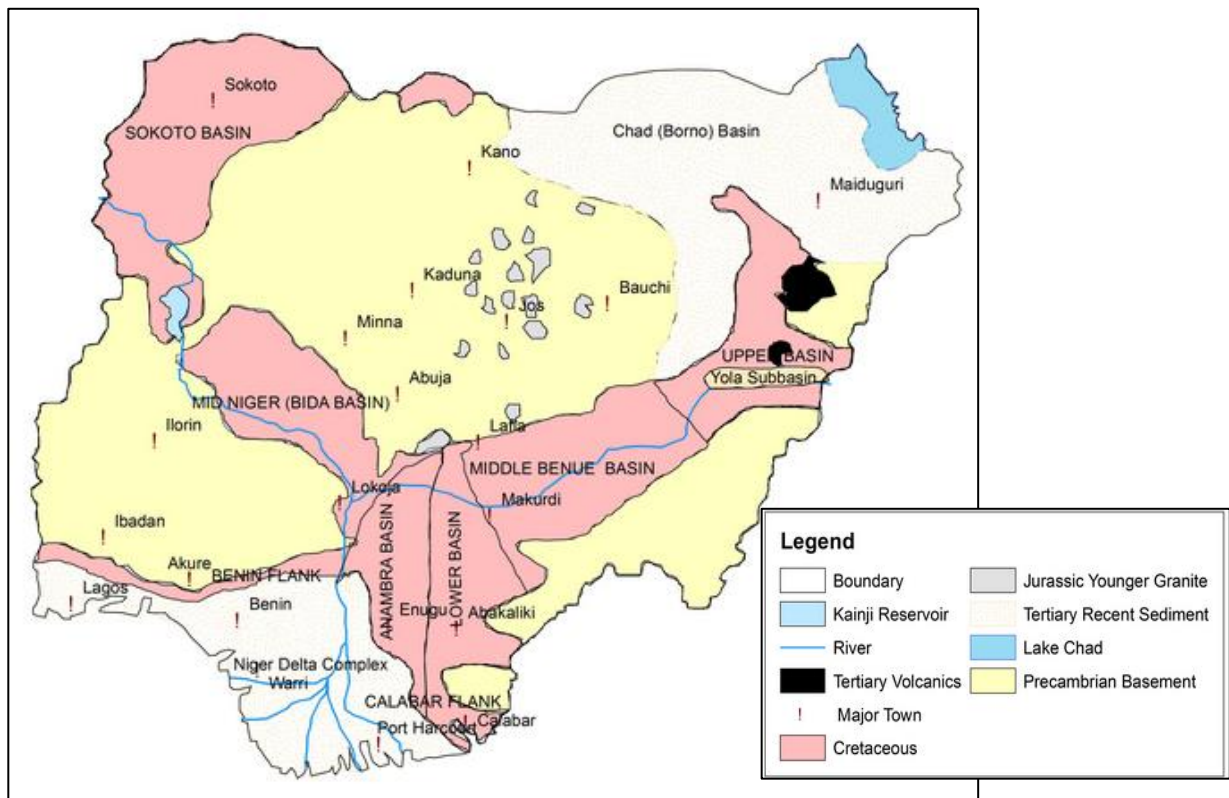
The major aquifers in Nigeria are Basement aquifers (North Central and few parts of the Northwest and Northeast Geopolitical Zones), Sedimentary basins (Southwest, Northwest and North East Geo-political Zones), Volcanic plateau (Southeast Zone), and River alluvium (North Central and South South Geopolitical Zones). There are eight major regional aquifer systems, 30 local and minor aquifers and 36 aquicludes, aquitards, and aquifuges in Nigeria. These eight mega regional aquifers have an effective average thickness of 360 m; with a range of 15–3,000m. The yields from the major aquifers range between 1.25 and 32 l/s<sup>24</sup> whereby the sedimentary basins generally form the most prolific aquifers (Nigeria Hydrological Services Agency 2018).

### Groundwater Quality

Generally, groundwater in most of the aquifers in Nigeria are fresh with low concentrations of total dissolved solids (<500 mg L<sup>-125</sup>). However, groundwater is exposed to active pollution in major cities and rural communities due to increased urbanization, indiscriminate waste disposals, industrial activities etc.

### 4.2.3 Geology

Nigeria's land mass is made up of two main rocks, Precambrian basement rocks which covers about two-thirds of the country's landmass and Sedimentary rocks of Cretaceous about half of the country (Landscapes and Landforms of Nigeria, 2023). Other minor formations are the Tertiary Volcanics, Tertiary sediments etc. The Precambrian basement rocks consisting of gneisses, migmatites, schist and various metamorphic rocks and granites. Figure 5 below shows some details of the geology of Nigeria. Precambrian and Cretaceous basements spread throughout the geopolitical zones, States and the FCT in particular. Jurassic younger granite spreads largely across Yobe, Borno and Gombe States including states in the coastal area across the Gulf of Guinea.



<sup>24</sup> Litres/Second (l/s)

<sup>25</sup> Milligram/Litre – mg/l or mg l<sup>-1</sup>



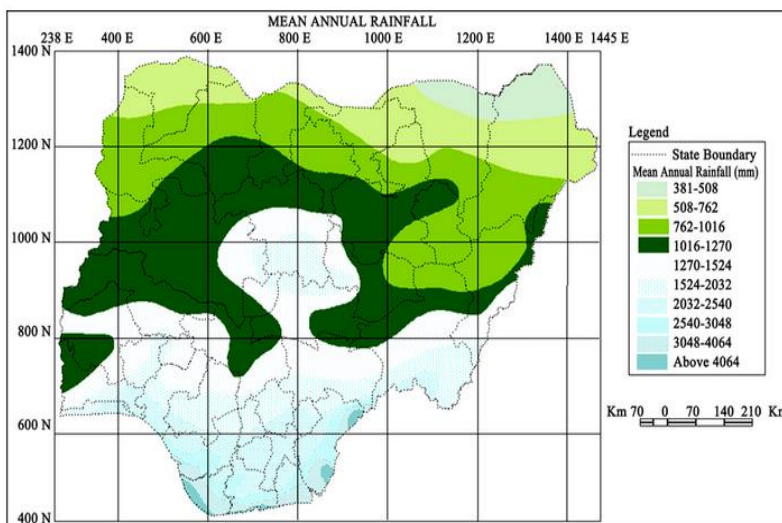
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**Figure 5: Nigeria Geological Map – Source: Nigeria Geological Survey Agency (NGSA)**

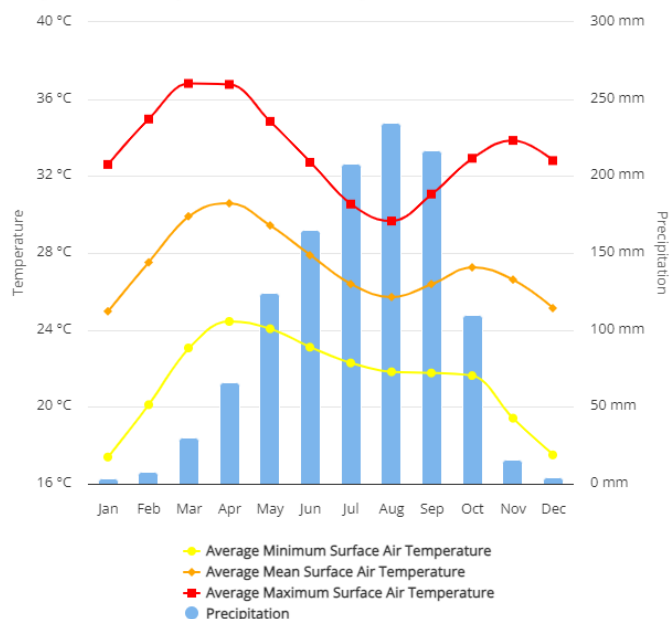
### 4.2.4 Climate

The project area of influence (which cuts across Nigeria) is divided into three main climatic regions: Tropical Rain Forest Region<sup>26</sup>, Near Desert Region<sup>27</sup> and Savannah Region<sup>28</sup> (Spatial distribution and temporal variability of Harmattan dust haze in sub-Sahel West Africa, 2017). However, due to unequal elevations in different parts of the country, there are differences in temperature and rainfall distribution (data span for rainfall is for 2001 - 2020). The tropical rainforest region covering the southern part of the country, has an annual rainfall of around 2,000 mm (80 inches), the near desert region covering the far north of the country with an annual rainfall around 500 mm (20 inches) and the savannah region covering the central portion of the country has annual rains around 1,000 mm (40 inches). The climate in Nigeria is semi-arid in the north, and humid in the south (WB Climate Change Knowledge Portal). Figure 6 shows mean annual rainfall.



**Figure 6: Mean Annual Rainfall of Nigeria – Source: Nigerian**

Monthly Climatology of Average Minimum Surface Air Temperature, Average Mean Surface Air Temperature, Average Maximum Surface Air Temperature & Precipitation 1991-2020; Nigeria



**Figure 7: Monthly Climatology of Average Minimum Surface Air Temperature, Average Mean Surface Air Temperature, Average Maximum Surface Air Temperature & Precipitation (Source: WB Climate Change Knowledge Portal)**

<sup>26</sup> RAAMP-SU states in Tropical Rain Forest Region include: Akwa Ibom, Bayelsa, Cross River, Delta, Edo, Ondo and Rivers states.

<sup>27</sup> RAAMP-SU states near Desert Region include: Adamawa, Bauchi, Borno, Gombe, Jigawa, Kano, Katsina, Yobe, and parts of Kaduna, Kebbi, Sokoto, and Zamfara states.

<sup>28</sup> RAAMP-SU states in Savannah Region include: Benue, Kogi, Kwara, Nasarawa, Niger, Plateau, Taraba, and the FCT, parts of Kaduna, Kebbi, Sokoto, and Zamfara states.

<sup>29</sup> Degree Celsius - °C

<sup>30</sup> Millimeter - mm



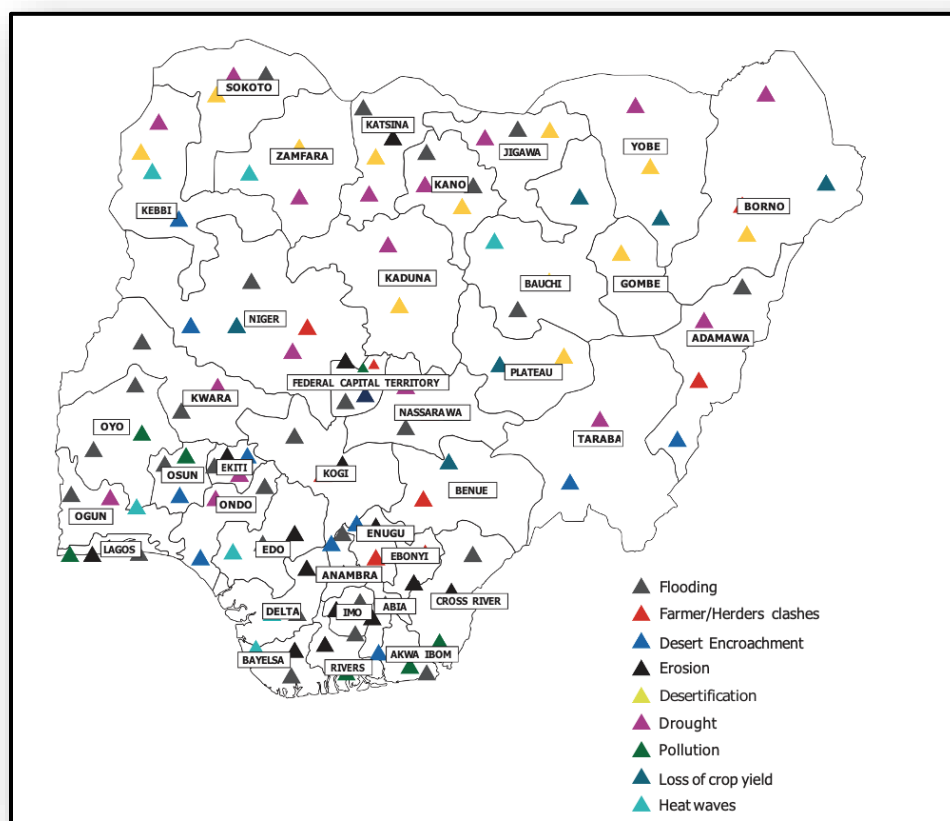
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Since temp. varies only slightly, rainfall distribution, over space and time, becomes an important factor in differentiating the seasons and climatic region except for the coastal zone, where it rains all year round. Rainfall is seasonal with distinct wet and dry seasons<sup>31</sup>. Figure 7 shows a data span for the period span of 1991 – 2020.

### 4.2.4.1 Climate Impacts and Vulnerability of Project Prospective States

In a previous study conducted in 2023, most states are prone to climate vulnerability. Cross-cutting issues are flooding, desert encroachment, erosion, desertification, drought, pollution, heatwaves, etc. Climate impacts and vulnerability vary across the RAAMP-SU Prospective States and the FCT. States within the same or similar ecological zone share broadly the same climate impacts and vulnerabilities. Flooding is a dominant climate impact in the North-Central states of Benue, Kogi, Kwara, Nasarawa, FCT, and Niger. Niger State also experiences drought, and this can be linked to its proximity to the northwest. The main impact of climate change in the North (Northeast and Northwest) is desertification, land degradation, and drought. For the south (Southeast, Southwest and South South), the major types of climate change impacts are flooding, gully and coastal erosions which have led to loss of arable land. It is important to point out that for the entire country, temperature changes are constant climate change impacts. This has resulted from an increase in global warming, and of course irregular rainfall patterns (Source: **Climate Impacts, Policies and Actions at the Subnational Level in Nigeria, 2023 – Department of Climate Change FMEnv**). Figure 8 below shows the Climate Impacts, as spread across the RAAMP-SU States.



**Figure 8: Climate Impacts Across the 36 RAAMP-SU Prospective States Including the FCT (Source: Climate Impacts, Policies and Actions at the Subnational Level in Nigeria, 2023 – Department of Climate Change FMEnv)**

<sup>31</sup> The southern regions experience strong rainfall events during the rainy season from March to October with annual rainfall amounts, usually above 2,000 mm, and can reach 4,000 mm and more in the Niger Delta. The central regions are governed by a well-defined single rainy season (April to September) and dry season (December to March).

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It is quite imperative that the climate impacts and vulnerabilities are taken into note during the design of sub-project/intervention works. This is so that they do not create opportunities for exacerbating already existing adverse impacts of climate change in the respective project locations to be identified when more detailed activities commence at the state level. For example, designs of cross drainages should channel flood waters to appropriate natural surface waters rather than contributing to pre-existing erosion problems.

### 4.2.5 Soil

Soil types in Nigeria vary according to their composition, physical, chemical, morphological and mineralogical characteristics. These vary from Sandy Clay, Sandy Loam, Clay Loam in the Northwest and Northeast geopolitical zones (with some Concretionary Clay in the Northeast); mostly Sandy Clay in the North Central geopolitical zone with few patches of Clay Loam and Sandy Loam. In the Southwest, the soil type is largely Sandy Loam with some patches of Clay Loam. In the South South, there are deposits of Silty Loam together with Sandy Loam and Clay Loam. In the Southeast, the soil type is mostly Sandy Clay and traces of Sandy Loam. Figure 9 shows the soil types in Nigeria across Geopolitical Zones. See sections 4.2.5 for guidelines for sample collection during preparation for the E&S assessment and section 4.2.6 for Soil Analysis conducted for some project locations

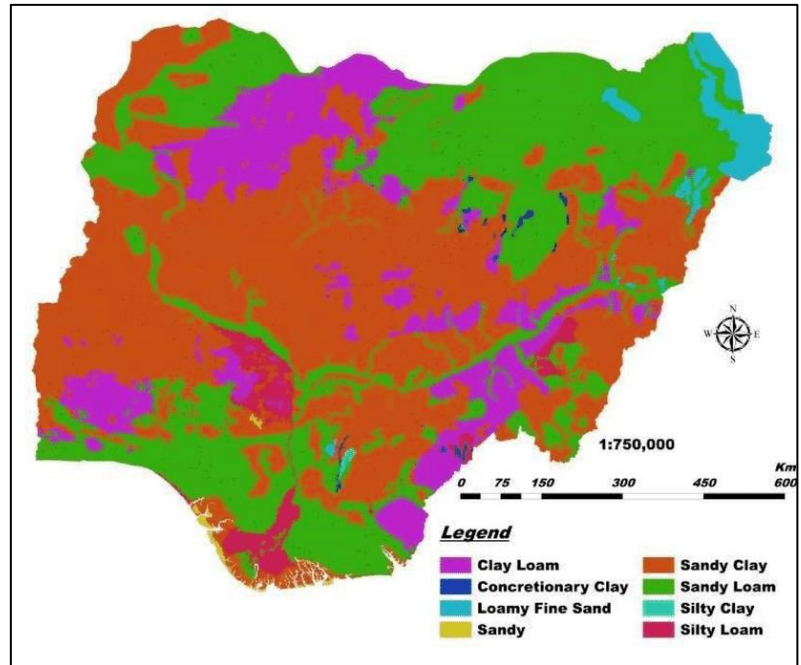


Figure 9: Soil Type Distribution Map of Nigeria – Source: Nigeria Institute of Soil Science

#### 4.2.5.1 Guidelines for Sample Collection during Preparation of the Environmental and Social Assessment

The E&S assessment shall apply GIIPs during the process of sample collection. Sample collection should also be based on FMEnv standard procedures, including those of NESREA and rural road development sector requirements (where available). In some cases, the FMEnv may advice on the parameters to be sampled, the extent of sampling and analysis to be conducted. The SPIUs in preparation of their ToRs following scoping, may propose sampling expectations and results. Furthermore, the expert procured by the respective RAAMP-SU SPIUs will also have liberty in designing the extent of the sampling; based on on-site visits, stakeholder engagements, baseline studies, experience and professional expertise. See box below for a description of sampling approaches which may be adopted and modified by the SPIUs.

**The sampling of environmental media for E&S assessments to be conducted for sub-projects/intervention works under the RAAMP-SU may utilize the following techniques and any other recent GIIPs for collecting baseline parameters (air quality, noise levels, soil quality, and surface water quality). This should also be conducted in alignment with FMEnv requirements for sample collection.**

**Air quality analysis should consider the following parameters:**

- Ambient air pollution: NO, NO<sub>2</sub>, SO<sub>2</sub>, H<sub>2</sub>S, CH<sub>4</sub>, VOC, particulates, temperature
- Inversion potential

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An AEROQUAL Hand-shield 500 may be used to determine the baseline air quality of parameters or any other preferred air quality measuring device. For RAAMP-SU states where proposed works may impact on nearby communities and/or social sensitivities in such a way that air quality is foreseen to be adversely impacted; air quality sampling shall be strategically. This may imply a) collecting samples along the proposed roads where intervention works shall be carried out, ii) in communities in close proximity to proposed work sites, other important social features/locations in close proximity to worksites such schools, healthcare facilities, roadside markets, bus/taxi parks etc.

### Noise sampling should consider the following:

The importance of noise sampling is to ascertain the baseline noise levels. Through the environmental and social assessment, it shall be ascertained if project activities cause a change in these baseline levels.

- Ambient Noise Levels
- Noise sources
- Proximity of human and ecological habitats to noise sources

A noise meter of preference shall be used to monitor the noise level in the project areas/locations. The meter should at least measure from 50 dBA to 126 dB (FMEEnv/WHO levels are 70dB/90dB) respectively. Measurements are made starting with the highest range setting and gradually reducing until a suitable range is found. The weighting function sets the meter's frequency response curve. A-weighting causes the meter to respond mainly to frequencies in the 500-to-10,000 Hz range, which is the human ear's most sensitive range. Results shall be compared with FMEEnv, NESREA and WHO regulation limits.

### Soil sampling:

Soil sampling should be conducted following best practice approaches. A common method is to overlay the sampling area with a grid and collect the samples randomly or as preferred. Soil samples to a minimal shall be analyzed for the following:

- **Soil Physio-chemical properties:** pH, total hydrocarbon content, electrical conductivity, redox potentials, particle size, aliphatic hydrocarbons, aromatic hydrocarbons, etc.
- **Soil microbiology:** hydrocarbon utilizing bacteria, total heterotrophic bacteria, etc.
- Soil morphological characterization

Soil will be collected at two (2) depths. 0cm-15cm for topsoil and 15cm-3-cm for sub-soil. Samples will be collected with a soil auger, and placed in foil paper or dark coloured polyethylene bags. Laboratory analysis should be done for simple and composite sampling.

Other studies should achieve:

- Land use description -agriculture, buildings, etc., protected areas, etc.

### Surface Water sampling:

In-situ and ex-situ water quality analysis should be conducted. Information from analysis will be used for inference. Parameters to be identified will include heavy metals, physicochemical properties, microbial composition. Additionally, the E&S Consultant shall work with an FMEEnv accredited laboratory for detailed analysis. Importantly, there should be a **chain of custody** for the sample collection and laboratory analysis. The chain of custody should be included in the E&S assessment report.

The samples will be collected using sterile dark colour-coded 100ml bijour bottles, stored in ice-packed coolers on-field and preserved in refrigerators at 4°C prior to laboratory analysis.

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**Importantly, if the TOR is submitted to the FMEEnv, they will provide the project with the list of parameters and number of samples to be tested for.**

**Note: The accredited laboratory shall adhere to the FMEEnv Maximum Permissible Limits (MPL) for parameters analyzed. Where in-situ analysis is done (air, noise, etc.), the devices used shall indicate the current parameter reading based on the sampling and the permissible limits. Devices and equipment may also be calibrated by the FMEEnv such that the MPLs are inputted for devices used in in-situ analysis.**

### 4.2.5.2 Soil Sample Collection

For the purpose of soil sampling this ESMF in the process of preparing the ESMF soil sampling was carried out in two states per geopolitical zones to guide safeguards SPIUs on the process of soil sampling when they carry out their E&S assessments. The table below provides a summary of baseline data gathered for physicochemical analysis of Soil Samples. A total of five (5) topsoil samples within a soil depth of 0-15 cm were collected from, from 20th – 28th March 2024 which was during the dry season. These samples will serve as representation of the baseline levels of soils at the project locations. Sampling was done using a manual soil auger. Samples for physicochemical analysis and heavy metal analysis were collected into coded plastic bags after being wrapped in aluminium foil. Soil samples were placed into containers made of high UV (Ultraviolet) resistant material.

### Physiochemical Properties of Soil Samples

The physiochemical analysis of soil samples reveals varying characteristics across the states. Soil pH measurements indicate slight to slightly to moderately acidic conditions, with values of 5.21, 5.23, 5.45 and 6.30 recorded for Kano, Jigawa, Bayelsa, Cross River states respectively. For Electrical Conductivity most states have elevated levels above 100  $\mu\text{S}/\text{cm}$ . However, as regards heavy metal concentrations, soil samples from Plateau, Gombe, Kano elevated levels of lead (Pb) at 2.874 mg/L, 5.695 mg/L, 20.14 mg/L. Samples from Plateau and Gombe had high levels of chromium (Cr) at 10.46 mg/L, 12.46 mg/L, surpassing the DPR/FMEEnv Maximum Permissible Limit (MPL). See Table 9 for detailed results.

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**Table 9: Physiochemical Values of Soil below and above the DPR/FMEnv Maximum Permissible Limit**

Soil Samples	Geopolitical Zones												FMEnv
	North Central		North-East		North-West		South-East		South-South		South-West		
	Plateau	Benue	Taraba	Gombe	Kano	Jigawa	Imo	Enugu	Bayelsa	Cross River	Ogun	Ekiti	
	Date: 21/03/2024 Time: 11:30am	Date: 20/03/2024 Time: 12:15pm	Date: 21/03/2024 Time: 01:00pm	Date: 22/03/2024 Time: 2:45 pm	Date: 27/01/2024 Time: 10:29am	Date: 28/01/2024 Time: 01:27pm	Date: 28/01/2024 Time: 11:34am	Date: 25/01/2024 Time: 02:37pm	Date: 26/03/2024 Time: 01:35pm	Date: 25/03/2024 Time: 10:30am	Date: 26/03/2024 Time: 03:00pm	Date: 26/03/2024 Time: 01:20pm	
pH	7.20	7.4	7.18	7.39	5.21	5.23	7.20	7.4	5.45	6.30	7.20	6.51	6.5-8.5
Moisture content (%)	18.94	17.82	13.75	16.32	12.97	13.75	12.97	12.89	15.94	14.35	18.94	12.39	-
Organic matter content (%)	8.34	4.12	7.74	8.56	7.74	6.96	5.64	7.74	6.96	9.54	8.34	7.35	-
Electrical cond. (µS/cm)	182.3	98.1	182.7	164.8	165.5	177.3	284.2	177.3	283.1	284.2	283.1	183.8	100
Salinity (mg/Kg)	11.30	17.20	16.30	12.26	14.82	10.70	14.82	11.82	21.70	28.73	25.70	24.73	-
NH <sub>4</sub> <sup>+</sup> (mg/Kg)	14.23	16.78	13.46	10.83	12.58	11.62	17.58	17.58	11.62	11.99	11.62	16.80	-
Nitrogen (%)	0.37	1.46	0.05	0.12	0.05	0.58	0.17	0.17	0.21	0.47	0.21	0.47	-
Phosphorus (mg/Kg)	7.38	0.37	5.89	12.29	11.37	8.56	13.54	11.34	8.56	10.41	9.27	12.56	-
Potassium (Meq/100g)	1.48	7.38	1.48	1.24	1.45	1.15	1.45	1.45	1.15	1.35	1.15	1.35	-
Base saturation (%)	10.35	1.48	10.35	11.92	12.80	10.53	12.80	12.80	10.53	11.60	10.53	11.60	-
CEC (Meq/100g)	37.37	10.35	37.37	42.47	43.92	34.68	43.92	43.92	34.68	39.64	34.68	39.64	-
Pb (mg/Kg)	2.874	37.37	ND	5.695	20.14	ND	ND	ND	ND	ND	ND	ND	2
Cr (mg/Kg)	10.46	ND	ND	12.46	ND	ND	ND	ND	ND	ND	ND	ND	0.05
Cd (mg/Kg)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.03
Ni (mg/Kg)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.07
Cu (mg/Kg)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	2.0-100



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### 4.3 Biological Environment

#### 4.3.1 Vegetation

Savannah and Forest are the predominant types of vegetation in Nigeria. The savannah vegetation stretches from the central parts of Nigeria to the extreme northern parts. It is divided into: i) Sahel savannah: in the North-Eastern borders, ii) Short grass Sudan savannah: stretching from upper western borders to the North-Western borders and, iii) Woodland/Tall grass Guinea Savannah (lying below the short grass savannah and covering the central states and parts of the eastern region of the country). The tropical forest vegetation covers the remaining southern portion of the country and is divided into three types: i) Rain Forest with tall trees, ii) Fresh water swamp consisting of both fresh and saltwater swamps and iii) Mangrove Forest which is made up of mangrove vegetation. Figure 10 shows the distribution of vegetation in Nigeria.

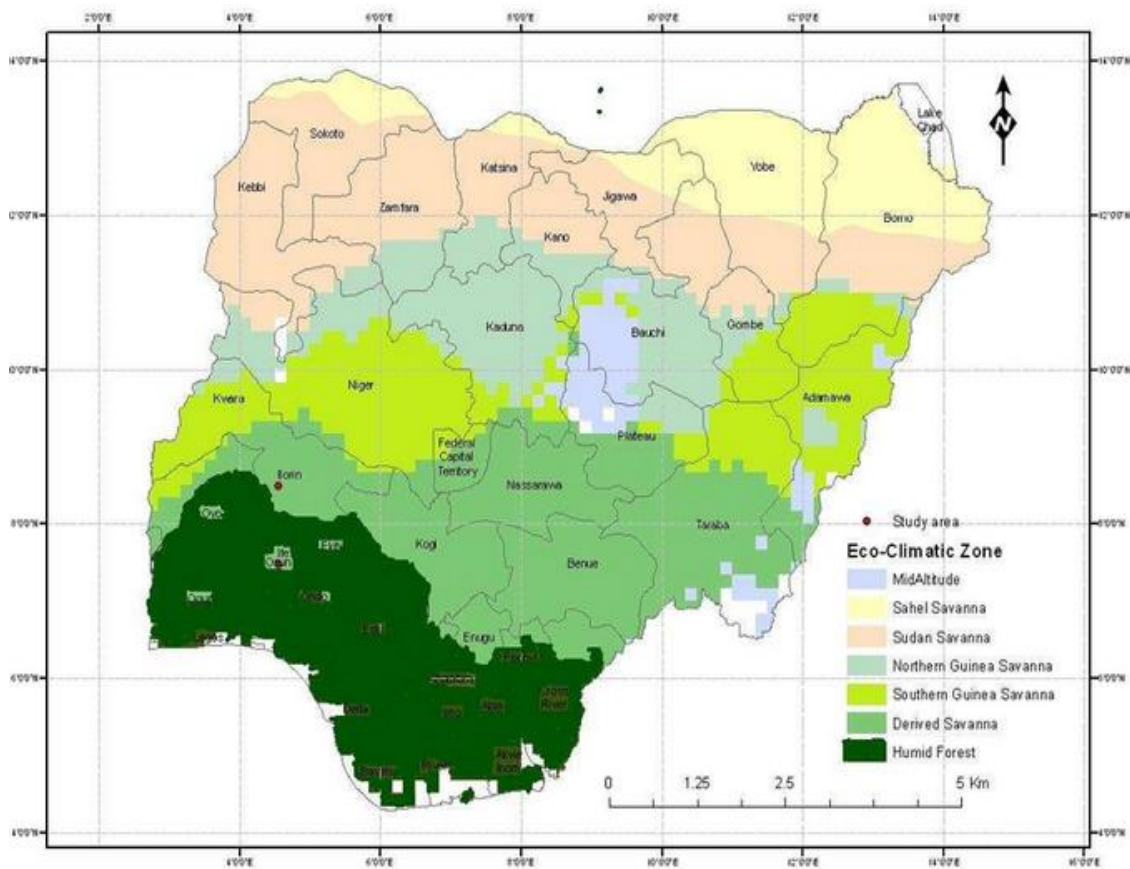


Figure 10: Vegetation Distribution Map of Nigeria – Source: Nigeria Conservation Foundation (NCF)

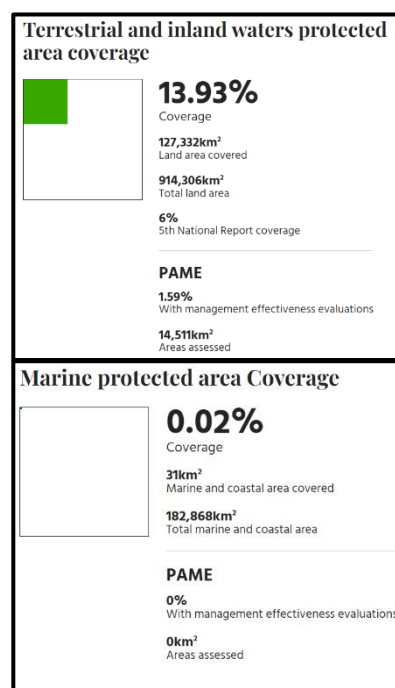
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### 4.3.2 Biodiversity and Nature Protection

Nigeria ranks 36<sup>th</sup> in the world of countries with the highest biodiversity<sup>32</sup>. It is widely believed that the areas surrounding Calabar in Cross River State contain the world's largest diversity of butterflies. The drill monkey is only found in the wild in Southeast Nigeria. The total number of higher plant species in Nigeria is 4,715 (of which 119 are threatened). For mammals, the total number of species is 274, and for breeding birds the total known species is 286. According to the International Union for Conservation of Nature (IUCN) Red List, Nigeria has a total of 23 critically endangered, 42 endangered and 104 vulnerable animal species<sup>33</sup>. Those classified as critically endangered in Nigeria include the Niger Delta red colobus (*Ptilocolobus epieni*), Cross River gorilla (*Gorilla gorilla diehli*), Gambles's relic (*Pentaplebia gamblesi*), Gambles's flatwing (*Neurolestes nigeriensis*) and Perret's toad (*Sclerophrys perreti*). Nigeria has 1,001 protected areas (nature reserves, wilderness areas, national parks), covering a total 5.5 million ha. The total land area under protection represents 6% of the total land area. Under categories I and II (the highest level of protection) Nigeria has 2.5 million ha.

**Protected Areas:** Nigeria currently encompasses a total of 1,001 designated protected areas, according to information sourced from the Protected Planet website. This information is critical for RAAMP-SU implementation, such that impacts of intervention works on biodiversity (nature reserves, wilderness areas, national parks) are taken into note during the Environmental and Social Assessments to be prepared by the states (See Chapter 6). These protected areas consist of terrestrial and inland waters covering 127,332km<sup>2</sup>, equivalent to 13.93% of the country's landmass. However, marine protected area coverage is comparatively smaller, totaling 31km<sup>2</sup>, which represents just 0.02% of Nigeria's marine and coastal area (See Figure 11). Among these protected areas are 933 Forest Reserves and 12 National Parks, including Kainji NP, Old Oyo NP, Cross River NP, Gashaka-Gumti NP, Yankari NP and Chad Basin NP. Additionally, Nigeria boasts 37 Game Reserves/Wildlife Sanctuaries, featuring locations such as Sambisa, Lake Chad, Udi-Nsukka, Wase Rock, Lame-Burra, Pai River, and Pandam. There are also 5 Strict Nature Reserves and 1 Community Forest as part of the nationally designated protected areas. Furthermore, Nigeria hosts 11 Ramsar Sites (Wetlands of International Importance) and 1 United Nations Education Scientific and Cultural Organization – Man and Biosphere Program (UNESCO-MAB) Biosphere Reserve, including Nguru Lake, Apoi Creek Swamp Forests, Baturiya Wetlands, Dagona Sanctuary Lake, and Foge Islands. Forest reserves make up approximately 97% of the protected areas and cover about 10% of Nigeria's total land area. These reserves vary in ecological classification, with those in the Savanna and Sahel regions differing from those in the lowland rainforest areas of southern Nigeria. Forest reserves in Nigeria are owned by the State Governments and managed by the State Forestry Departments (SFDS), which employ professional and technical staff, including uniformed guards, to carry out their responsibilities. See Annex 13 for some **National Protected Areas and World Heritage Sites in Nigeria Relevant for Consideration During RAAMP-SU Implementation**.



**Figure 11: Nigeria Terrestrial/Inland Waters and Marine Protected Areas Coverage (Source: Protected Planet).**

The National Parks Service (NPS) oversees the management of all National Parks, with each park headed by a General Manager and supported by professional and technical staff. Despite the presence of protected areas, conservation efforts in Nigeria are considered inadequate to fully protect the country's biologically diverse environments. Of particular concern are the Niger-Delta area and the Hadeja-Nguru wetlands. Oil exploration activities have had adverse environmental impacts in the Niger Delta region, while human activities such as bush burning and shifting cultivation are causing ecosystem destruction in the Hadeja-Nguru wetlands, diminishing its value as a habitat for migratory birds from Europe.

<sup>32</sup> Source: International Union for Conservation of Nature (IUCN)

<sup>33</sup> Source: International Union for Conservation of Nature (IUCN)

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### 4.4 Social Environment

#### 4.4.1 Population and Demographics

Nigeria is the most populous country in Africa and the 6<sup>th</sup> most populous country in the world<sup>34</sup>. Nigeria has the 16<sup>th</sup> highest percentage population under 18 Years of age in the world (50.4 % of the population). Nigeria's population is estimated to be 223,804,632<sup>35</sup>. This is based on the annual exponential population growth rate of 2.41%. The total territorial area of Nigeria is 923,769 km<sup>2</sup> (National Boundary Commission, (NBC)). The population of Nigeria is 229,152,217. The population density is 234.3 persons per km<sup>2</sup>. The environmental assessment reports for the subprojects shall give the estimated populations of the host communities/neighborhoods. The country is viewed as a multinational state as it is inhabited by over 500 ethnic groups, of which the three largest are the Hausa, Igbo and Yoruba. These ethnic groups speak over 500 different languages and are identified with a wide variety of cultures.

#### 4.4.2 Gender Based Violence (GBV)

In Nigeria, there are currently 39,109 reported cases, with 1,849 fatal cases, 27,228 closed cases, 11,881 open cases, and 571 Convicted Perpetrators (March 2024)<sup>36</sup> (See Figure 12 for a graph representation). Currently, there are 893 GBV service providers across all states in Nigeria recognized by the Federal Ministry of Women Affairs (FMWA). According to the study, undertaken by African Health Sciences, one-third of girls in Nigeria aged 17-19 reported having experienced sexual violence at some time in their lives. By age 24, 42% reported lifetime experience of sexual violence<sup>37</sup>. Significantly, GBV devastates survivors and their families and also has significant social and economic costs. Importantly, besides interpersonal and sexual violence, child marriage and Female Genital Mutilation are the other culturally harmful practices prevalent across Nigeria. Conflict in the North East has further contributed a steep rise in targeted violence against women and children by Boko Haram increasingly for abduction and violence. Similarly, the increase of kidnappings and insurgency in some North-West states such as Katsina, Zamfara and Sokoto is also predisposing women, children and men to form of GBV. Remarkably, in Nigeria, Donor-funded projects are encouraging the inclusion of practices, assessments and activities that factor in GBV risks assessment and mapping of GBV services as well as preparation of GBV action plans to aid safe implementation of their programs/projects especially where influx of labour and other factors may increase SEA/SH/GBV risks. Particularly, the preceding RAAMP project has seen to the preparation of requisite documents supporting coordinated approaches to preventing and managing SEA/SH/GBV. Some of these include GBV mapping for RAAMP-SU benefiting states such as Oyo, Kwara, Ondo, Kogi, Bauchi, Ogun and Abia.

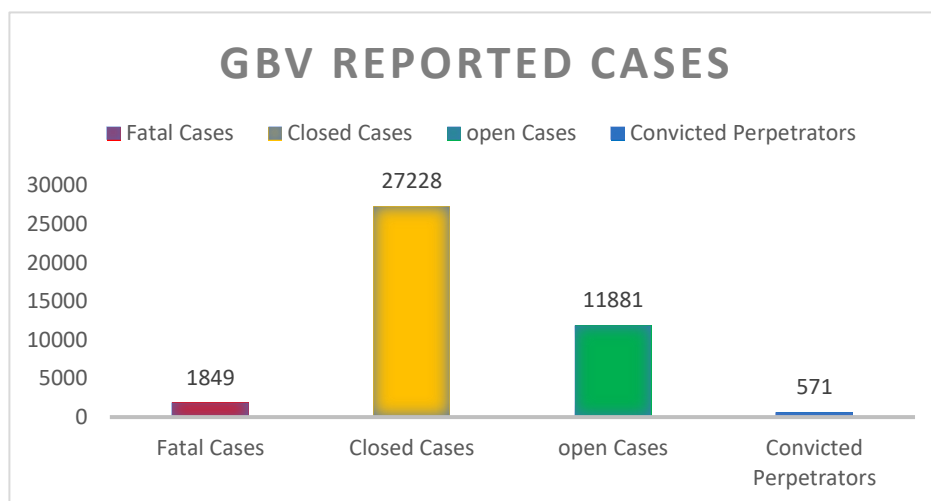


Figure 12: Data on GBV Reported Cases According to FMWA

<sup>34</sup> [2023 U.N. Population Revision](#)

<sup>35</sup> [2023 U.N. Population Revision](#)

<sup>36</sup> [Federal Ministry of Women Affairs and Social Development - National Gender Based Violence Dashboard](#)

<sup>37</sup> Sexual violence among young women in Nigeria: a cross-sectional study of prevalence, reporting and care-seeking behaviours [Afr Health Sci. 2023 Mar; 23\(1\): 286-300.](#)

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### 4.4.3 Land Use Pattern, Agricultural Production and Livelihoods

The estimated land area of Nigeria is 923,768 km<sup>2</sup>. Land use varies based on location and the needs of the community. However, the different uses of land revolve around agriculture, industry and social needs such as the provision of infrastructure. In recent years, the real estate sector has become one of the main users and optimizers of land resource in Nigeria. In 2021, Nigeria had an arable land area of roughly 36.9 million hectares.<sup>38</sup> In addition, 6.6 million hectares were under permanent crops, while 25.2 million hectares were under permanent meadows and pastures<sup>39</sup>. Agriculture<sup>40</sup> is a key activity for Nigeria's economy after oil. Nevertheless, agricultural activities provide a livelihood for many Nigerians, whereas the wealth generated by oil reaches a restricted share of people. In fact, agricultural production ranks among the ten main export categories from Nigeria. Major produce in the north are cereals (such as millet, millet), rice, maize, beans, soya beans and vegetables. Irish potato, yam, potato is the main agricultural produce in the middle belt while cassava, cash crops such as cocoa, coffee, cola nuts and cashew nuts are grown in the south-western Nigeria, also, red oil production and cassava are exceptionally produced at the south-eastern region. Notably, the WB supports agriculture in Nigeria through several projects some of which include RAMP, RAMP2, RAAMP, RAAMP-SU, Transforming Irrigation Management in Nigeria (TRIMING), Staple Crop Processing Zones (SCPZ), FADAMA 1, 2 & 3, Commercial Agricultural Development Project (CADP) etc.

Livelihoods in Nigeria are diverse and varied, reflecting the country's rich cultural, economic, and geographic diversity. An overview of some of the major livelihoods in Nigeria excluding agriculture include:

- **Trade and Commerce:** Many Nigerians are involved in various forms of trade and commerce, including small-scale retailing, wholesale trading, and informal sector activities. Markets and trading centers are integral to the livelihoods of millions of Nigerians.
- **Services:** The services sector, including banking, finance, telecommunications, transportation, healthcare, education, and hospitality, provides employment opportunities for a significant portion of the population, particularly in urban areas.
- **Artisanal and Small-Scale Mining:** Nigeria is endowed with abundant mineral resources, and artisanal and small-scale mining activities contribute to the livelihoods of many people, albeit often in informal and sometimes hazardous conditions.
- **Manufacturing and Industry:** Nigeria's manufacturing sector, though relatively small compared to other sectors, provides employment opportunities in areas such as food processing, textiles, construction materials, and consumer goods production.
- **Informal Sector Activities:** The informal sector plays a crucial role in Nigeria's economy, providing livelihoods for a large segment of the population engaged in activities such as street vending, artisanal production, waste recycling, and domestic services.
- **Government Employment:** Employment in the public sector, including civil service jobs, provides livelihood opportunities for many Nigerians, particularly those with formal education and specialized skills.
- **Entrepreneurship:** Nigeria has a vibrant entrepreneurial ecosystem, with many individuals engaged in small-scale businesses, startups, and self-employment ventures across various sectors of the economy.

### Livelihood Restoration Activities Implemented by RAAMP and Anticipated Expansion Through RAAMP-SU

RAAMP-SU aims to

- **Support Livelihood Resilience:** The parent project (RAAMP) has incorporated Livelihood Restoration Programs to support livelihood resilience of PAPs and vulnerable persons. The goal of the Livelihoods Restoration Program has been geared to sustainable livelihood of PAPs and households at or exceeding pre-project levels through the harnessing of local economic development associated with the Project. Similarly, the RAAMP-SU shall adopt and build upon this. For both the parent project and RAAMP-SU, the livelihood restoration package is not an alternative to compensation entitlements of PAPs but seeks to ensure that vulnerable PAPs are provided with sustainable livelihood measures/alternatives. The definition of

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<sup>38</sup> Source: <https://www.statista.com>

<sup>39</sup> [Agricultural areas in Nigeria 1980-2021.](#)

<sup>40</sup> Agriculture is the mainstay of the Nigerian economy and a significant source of livelihood for millions of people. Subsistence farming, cash crop cultivation (such as cocoa, oil palm, rubber, and cassava), livestock rearing (cattle, goats, sheep, and poultry), and fishing are common agricultural activities.



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vulnerable PAPs includes elderly persons, female headed households affected by the project, orphans, persons with disabilities and the poorest among PAPs.

- **Promote Economic Opportunities:** Building on RAAMP, the RAAMP-SU is positioning itself to improve rural roads so as to reinforce the economic and social inclusion of beneficiary communities through increasing their access to markets and socio-economic infrastructures in geographic areas that are particularly fragile to conflict and food security. Such interventions will open localities for socioeconomic development and will be a catalyst for creation of growth centers. Available evidence on such interventions demonstrates that volume of marketed agricultural products will increase, farm gate prices will rise, post-harvest losses will be reduced, and these will result in the rise of households' income while improving food security. It has also been demonstrated that improved access to markets will create jobs (generating non-farm income), lowers cost of inputs, and lower the cost of transport for rural Nigerian women who are more severely impacted by travel and transportation constraints.
- To address specific livelihood challenges faced by vulnerable populations, including women, youth, and internally displaced persons, the parent project (RAAMP) ensured the following: a) Provision of a list of livelihood restoration activities for land, wage and enterprise-based activities to vulnerable PAPs b) Provision of financial literacy and business plan training to the vulnerable PAPs regardless of the livelihoods training c) Establishment of technical skills training targets to identify needs for long term operations d) Small business increases access of PAPs to recruitment for sub-projects/intervention works opportunities and other local procurement opportunities; e) Increase in overall agricultural production within project communities and decrease in incidence of food insecurity; f) Linkage of local agriculture production with larger export market opportunities g) implementation of monitoring and evaluation program. It is planned that the RAAMP-SU will help achieve gender mainstreaming, youth engagement and entrepreneurship, inclusive market access, provide policy advocacy and Institutional Support and monitoring and evaluation to address these challenges and promote economic growth.

### 4.4.4 Employment, Economy, and Poverty

Estimate from the Nigerian Bureau of statistics (NBS) indicates that unemployment rate in Nigeria surged to 5% in the third quarter of 2023 from 4.2% in the previous quarter, while youth unemployment stands at 8.6%. The Nigerian economy rests on two pillars: oil/gas and agriculture. Both sectors contribute 65% - 70% of GDP, while the secondary sector (manufacturing contributes about 7% and the tertiary sector (transport, trade, housing etc) contributes about 25%. According to the NBS, Nigeria's Gross Domestic Product (GDP) grew by 3.46% (year-on-year) in real terms in the fourth quarter of 2023. This growth rate is lower than the 3.52% recorded in the fourth quarter of 2022 and higher than the third quarter of 2023 growth of 2.54%. The performance of the GDP in the fourth quarter of 2023 was driven mainly by the Services sector, which recorded a growth of 3.98% and contributed 56.55% to the aggregate GDP. The agriculture sector grew by 2.10%, from the growth of 2.05% recorded in the fourth quarter of 2022. The growth of the industry sector was 3.86%, an improvement from -0.94% recorded in the fourth quarter of 2022. In terms of share of the GDP, industry, and the services sectors contributed more to the aggregate GDP in the fourth quarter of 2023 compared to the fourth quarter of 2022. On an annual basis, GDP grew by 2.74% in 2023 relative to 3.10% in 2022. The Inflation rate for January 2024 was 29.90% from 28.92% in December 2023. Food Inflation was 35.41% in January 2024, from 33.93% in December 2023. Currently, the USD- Naira exchange rate is 1USD to ₦ 1,610.74 as at 16<sup>th</sup> March, 2024. The value of the Dollar to Naira has depreciated by 74.24% since 2023 from 1USD to ₦ 415. According to the WB<sup>41</sup>, Nigeria's poverty rate rose from 40% in 2018 to 46% in 2023, pushing an additional 24 million people below the national poverty line from 79 million to 104 million.

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<sup>41</sup> [Nigeria Development Update - Turning the Corner: From Reforms and Renewed Hope, to Results](#)



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### 4.4.5 Water Supply and Sanitation Condition

Poor access to improved water and sanitation in Nigeria remains a major contributing factor to high morbidity and mortality rates among children under 5 years (UNICEF). The use of contaminated drinking water and poor sanitary conditions result in increased vulnerability to water-borne diseases, including diarrhoea which leads to deaths of more than 70,000 children under 5 years annually (UNICEF). 73% of the diarrhoea and enteric disease burden is associated with poor access to adequate water, sanitation and hygiene, and is disproportionately borne by poorer children. Frequent episodes of WASH related ill-health in children, contribute to absenteeism in school, and malnutrition. The use of contaminated drinking water and poor sanitary conditions result in increased vulnerability to water-borne diseases. UNICEF states that only 26.5% of the national population use improved drinking water sources and sanitation facilities. With this in view, achieving Sustainable Development Goal 6 (**SDG Goal 6 – Clean Water and Sanitation**) in Nigeria by 2030 requires extraordinary efforts. Based on World Bank estimates, Nigeria will be required to triple its budget or at least allocate 1.7% of the current Gross Domestic Product (GDP) to WASH. The ambition is highest for rural sanitation where the gap for improved services is 64%. Funding for the sub-sector is weak, and significant household contribution is needed to eliminate open defecation despite low family incomes.

### 4.4.6 Communicable and Non-Communicable Diseases in Nigeria

#### Communicable Diseases

##### **Malaria**

The Federal Ministry of Health (FMOH) maintains that Malaria remains a significant public health problem in Nigeria with an estimated 65.4 million cases in 2021 (with an incidence rate of 298.6 cases per 1000 population), resulting in 193,512 deaths<sup>42</sup>. This equates to approximately 30% of the worldwide deaths from malaria. Despite the high burden, the country is off track to meet the targets set by the Global Technical Strategy for Malaria as the malaria incidence rate has increased since 2015 and the gap from the target has widened each year.

##### **Tuberculosis and HIV/AIDs**

With an estimated incidence rate of 229 TB cases per 100,000 in 2021 (World Health Organization (WHO)), the burden is still high, however the rate continues to fall since 2015. The mortality rate of TB cases (all forms, excluding HIV coinfection) has decreased from 62 to 53 per 100,000 population between 2015 and 2021. The TB mortality rate among HIV-positive people decreased from 23 to 6.2 in the same period. Nigeria has met two of the 95-95-95 goals:

- There is limited data on the number of people living with HIV know their status.
- 98% of the people living with HIV that know their status are on treatment.
- 95% of people living with HIV and on treatment are virally suppressed.

Approximately 1.7 million people were receiving antiretroviral treatment in 2021.

##### **Neglected Tropical Diseases (NTDs)**

Nigeria is endemic for four of the five NTDs amenable to preventive chemotherapy through mass drug administration (MDA), namely lymphatic filariasis, schistosomiasis, soil-transmitted helminthiasis, and trachoma (WHO). In 2020, 26.5 million of the 31.7 million people targeted (84%) were treated with MDA. Other notable NTDs that remain endemic are Human Africa trypanosomiasis (gambiense), leishmaniasis (cutaneous), Buruli ulcer, taeniasis and cysticercosis leprosy, and rabies.

#### Non-communicable diseases

NCDs are a significant health problem in Nigeria. The age-standardized mortality rate across four major NCDs (Cardiovascular Disease, Chronic Respiratory Disease, Cancer and Diabetes) was 565 per 100,000 in males and 546 in females in 2021. Nigeria has implemented efforts on the NCD progress indicators on areas including the NCD policy and plan, tobacco taxes, tobacco advertising bans, tobacco health warnings, and alcohol taxes, however there is limited progress against a subset of the indicators. These include tobacco smoke free/pollution, tobacco media campaigns, salt policies, trans fats policies, marketing to children and physical activity awareness.

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<sup>42</sup> [Country Disease Outlook- Nigeria – World Health Organization \(WHO\)](#)

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### 4.5 State Specific Baseline Data of RAAMP-SU Prospective States and the FCT

The baseline environmental and social data for the 36 RAAMP-SU prospective states and the FCT are presented in Table 10 below. Note that state specific E&S baseline will be a pre-requisite in preparing environmental and social assessments at the state levels. These E&S assessments should provide information on the biophysical and socioeconomic environment where intervention works in the states are to be carried out. It should present the real picture of the sub-project corridor/boundary such that the E&S assessments speak to the realities of the project site(s).

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**Table 10: Baseline Environmental and Social Data of the RAAMP-SU Prospective States and the FCT**

Parameter	Abia	Adamawa	Akwa Ibom	Anambra	Bauchi	Bayelsa	Benue	Borno	Cross River
<b>Location<sup>43</sup></b>	4.8666° N 7.3823° E	9.3157° N 12.4826° E	5.0382° N 7.8931° E	6.2109° N 7.0690° E	10.3127° N 9.8432° E	4.8167° N 6.0833° E	7.7277° N 8.5434° E	11.8464° N 13.1575° E	5.6117° N 8.1557° E
<b>Capital City<sup>44</sup></b>	Umuahia	Yola	Uyo	Awka	Bauchi	Yenagoa	Makurdi	Maiduguri	Calabar
<b>No of LGAs<sup>45</sup></b>	17	21	31	21	20	8	23	27	18
<b>Geopolitical Zone<sup>46</sup></b>	South East	North East	South-South	South East	North East	South-South	North Central	North East	South-South
<b>Bordering States<sup>47</sup></b>	On the North and North- East by Anambra, Enugu and Ebonyi states; on the West by Imo state; on the East and South-East by Cross River and Akwa Ibom States and on the South by Rivers state.	Borno State to the north. Gombe State to the west. Taraba State to the southwest. Cameroon to the east. Adamawa State shares a boundary with Yobe State at its north-eastern corner.	On the East by Cross River State, on the West by Rivers State and Abia State, and on the South by the Atlantic Ocean and the southern-most tip of Cross River State.	On the East by Enugu State, on the west by Delta state, on the north by Kogi and on the south by Imo & River states	Kano and Jigawa to the north, Taraba and Plateau to the south, Gombe and Yobe to the east and Kaduna to the west	Rivers State to the west and northwest, Delta State to the southwest, and the Atlantic Ocean to the south	Nasarawa state to the North, Cross River state to the South, Taraba state to the East, Enugu state to the South-west and Kogi state to the West.	The State occupies the greatest part of the Chad Basin and shares borders with the Republics of Niger to the North, Chad to the North – East and Cameroon to the East. within the country, it is bordered by Adamawa to the South, Yobe to the West and Gombe to the southwest	Benue state to the North; Ebonyi and Abia states to the West; Cameroon Republic to East and the Atlantic Ocean and Akwa Ibom State to the south.
<b>Landmass<sup>48</sup></b>	6,320 km <sup>2</sup>	36,917km <sup>2</sup>	7,081km <sup>2</sup>	4,844 km <sup>2</sup>	49,199km <sup>2</sup>	10,773 km <sup>2</sup>	34,059km <sup>2</sup>	57,799km <sup>2</sup>	20,156km <sup>2</sup>
<b>Nature of Soil<sup>49</sup></b>	The soils of Abia State fall within the broad group of ferrallitic soils of the coastal plain sand and escarpment. Other	Adamawa State has a diverse range of soil types due to its varied topography and geological	More than 75% of Akwa Ibom State consists of level-to-gently undulating sandy plains where rivers are few and far	Three soil types can be recognised in the state. They are: i) alluvial soils, ii) hydromorphic soils, and iii) ferallitic soils	The soils are well drained shallow immature sandy soils with evidence of little profile differentiation. They are formed mainly	The major soil types in the state are young, shallow, poorly drained soils (inceptisol Aquepts) and	The soils are mainly oxisols and ultisols (tropical ferruginous) which vary over space with respect to texture, drainage,	Vertisols dominate the flat plains close to Lake Chad; and also, in the depressions. These are 'heavy dark clay soils	Cross River soils are predominantly of five types. These are: (i) the steep, shallow, yellowish and red gravely soils on the Oban Obudu Hills; (ii)

<sup>43</sup> Source: [https://www.mapsofworld.com/lat\\_long/nigeria-lat-long.htm](https://www.mapsofworld.com/lat_long/nigeria-lat-long.htm)

<sup>44</sup> Source: "36 States of Nigeria, their Capitals and Governors :: Nigeria Information & Guide". Nigeria (in Kinyarwanda). Retrieved 2020-02-04.

<sup>45</sup>Source: Postcodes NG - comprehensive directory of LGAs, districts, and villages in Nigeria

<sup>46</sup> Source: *Ethnic groups and geo-political regions in Nigeria Archived from on 2014-01-11. Retrieved 2014-08-29.*

<sup>47</sup> Source: *Ethnologue (22 ed.)*. Retrieved 10 January 2020.

<sup>48</sup> Source: Wikipedia

<sup>49</sup> Source: Research Gate

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Parameter	Abia	Adamawa	Akwa Ibom	Anambra	Bauchi	Bayelsa	Benue	Borno	Cross River
	soil types include alluvial soils found along the low terrace of the Cross River and other rivers.	formations. The predominant soil types found the State include: ferruginous tropical soils, alluvial soils and hydromorphic soils	between.		from unconsolidated sands or Aeolian drift and are characterized by critically low organic matter, cation exchange capacity and available phosphate.	acid sulphate soils (Sulphaquepts).	composition etc. They are highly weathered with sandy surface layer overlying clay mottled subsoil.	which develop wide cracks during the dry season. On the dunes are regosols which are shallow with weakly developed profiles. The volcanic and Basement Complex areas have fertile clayey loamy soils in the valley bottoms, but skeletal soils and rock outcrops occur along the gentle and steep slopes.	the deep lateritic, fertile soils on the Cross River Plain; (iii) the dark clayey basaltic soils in Ikorn; (iv) the sandy, heavily leached soils on the older coastal plain which are highly susceptible to gully erosion; and (v) the swampy hydromorphic soils of the lower deltaic coastal plain that is usually floated during the rains
<b>Vegetation Types<sup>50</sup></b>	The vegetation in Abia State is ordinarily considered part of tropical rain forest which is the dominant natural vegetation in most parts of southern Nigeria.	Adamawa State has a diverse array of vegetation types, ranging from lush Guinea Savannas in the south to Montane Forests in the east, reflecting its rich ecological diversity.	The native vegetation has been almost completely replaced by secondary forests of predominantly wild oil palms, woody shrubs and various grass undergrowth. Mangroves cover extensive parts of the coastal LGAs. Farmland mixed with oil palm and degraded forests predominate in the rest of the state.	The natural vegetation in the greater part of Anambra state is tropical dry or deciduous forest, which, in its original form, comprised tall trees with thick under growth and numerous climbers	Bauchi state is one of the states in the northern part of Nigeria that span two distinctive vegetation zones, namely, the Sudan Savannah and the Sahel Savannah. The Sudan savannah type of vegetation covers the southern part of the state. The Sahel type of the savannah, becomes manifest from the middle of the state as one moves from the state's south to its north.	Some of the primary vegetation types found in Bayelsa State include: Mangrove Swamps, freshwater swamp forests, rainforests, rivers and wetlands, and coastal dunes and beach vegetation	The vegetation of Benue State lies in the southern Guinea Savannah. However, Persistent clearance of the vegetation for farming purposes has led to the development of re-growth vegetation.	Generally, two vegetation zones are identified in the state: Sudan savannah and southern Sahel. In the wetter south shrub vegetation is interspersed with tall trees and woodland.	The vegetation of Cross River State ranges from mangrove swamps, through rainforest, to derived savannah, and montane parkland.
<b>Average Max. Temperature</b>	Mean temperatures vary between 24°C to	Mean temperatures vary between	Mean temperatures vary between 26°C to	Mean temperatures vary between 27°C to 36°C	Mean temperatures vary between 29°C to 40°C	Mean temperatures vary between	Mean temperatures vary between 28.9°C to	Mean temperatures vary between 30.2°C to	Mean temperatures vary between 22°C to 33°C

<sup>50</sup> Wikipedia

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Parameter	Abia	Adamawa	Akwa Ibom	Anambra	Bauchi	Bayelsa	Benue	Borno	Cross River
	37°C	30°C to 34°C	36°C			30°C to 32°C	40.9°C	42.6°C	
<b>Rainfall</b>	The total rainfall decreases from 2200mm in the south to 1900mm in the north.	The total annual rainfall varies from 1,200 to 1,800mm (47 to 71 inches) annually	The total annual rainfall varies from 4000mm along the coast to 2000mm inland.	The total annual rainfall averages 1828mm	The total rainfall varies from 1300mm in the south to 700mm in the north.	The total rainfall varies between 2,000 to 3,000mm	The total annual rainfall ranges from 1100mm to 1800mm.	The total annual rainfall ranges from 486mm to 1046mm.	The total annual rainfall ranges from 2300mm to 3800mm
<b>Geology and Terrain</b>	There are nine main geological formations from south to north. These include: The Benin formation (or Coastal Plain Sand), the Bende-Ameki Group, the Nkporo Shale Group, the Nsukka formation (Upper Coal Measures), the Igali sandstone (False-bedded Sandstone) etc.	The geological formations in Adamawa include: Basement complex which consists of granite, gneiss, and schist. Younger sedimentary basins characterized by sandstone, shale and limestone, basalt flows and volcanic ash deposits, gypsum, mineral resources such as coal, kaolin and clay	The whole of Akwa Ibom State is underlain by sedimentary formations of Late Tertiary and Holocene ages. Deposits of recent alluvium and beach ridge sands occur along the coast and the estuaries of the Imo and Qua Iboe Rivers, and also along the floodplains of creeks.	Anambra State lies in the Anambra Basin, the first region where intensive oil exploration was carried out in Nigeria. About 6,000m of sedimentary rocks comprise ancient cretaceous deltas, somewhat similar to the Niger Delta, with the Nkporo Shale, the Mamu Formation, the Ajali sandstone and the Nsukka formation as the main deposits	The state lies on the Kerri formation, of tertiary age, which is composed of sandstone, silt stones, kaolinites and grits. Underneath this lies the Gombe formation, cretaceous age, composed of sandstones, silt stones, and ironstones.	The major geological characteristic of the state is sedimentary alluvium. The entire state is formed of abandoned beach ridges and due to many tributaries of the River Niger in this plain, considerable geological changes still abound.	Benue State falls within the Benue Valley/trough which is believed to be structurally During the Tertiary and possibly the interglacial periods of the Quaternary glaciation, the Benue and Niger Valleys, otherwise known as the Niger/ Benue trough, were transgressed by the waters of the Atlantic Ocean. As a result, marine sediments form the dominant surface geology of the area.	A greater part of the state lies on the Chad Formation. This is an area that was subjected to prolonged continental and lake sedimentation as a result of the down warp of the Chad Basin in the Pleistocene Period. The Chad Formation is separated by Cretaceous Bima and Kerri sandstones.	The Cross River State, Nigeria, is underlain by the Precambrian age crystalline basement complex and by rocks of Cretaceous to Tertiary age. The Basement Complex, which forms the Oban Obudu hills, consists of Precambrian schists and gneisses, with intrusive of igneous rocks. The sedimentary basins, of Cretaceous Tertiary age, are found in the Ikom Depression (Mamfe Rift), the Cross River Plain, and the Calabar Flank.
<b>Major Ethnic Groups<sup>51</sup></b>	Igbo	Fulani, Chamba, Bachama, Gude, Bata, and Babur	Ibibio, Annang, Eket and Oron	Igbo and Igala <sup>52</sup>	Hausa, Fulani, Gerewa, Sayawa, Jarawa, Kirfawa, Turawa Bolewa, Karekare, Kanuri, Fa'wa, Butawa, Warjawa, Zulawa, etc.	Ijaw, Nembe, Ogbia, Epie-Atissa, Epie-Atissa, Ibani	Tiv, Idoma and Igede	Kanuri	Efik, Ejagham, Yakurr, Bette, Yala, Igede, Ukelle and Bekwarra.
<b>Main Native Language</b>	Igbo	Fulani	Ibibio, Annang	Igbo	Hausa	Ijaw	Tiv, Idoma and Igede	Kanuri, Hausa	Boki, Ejagham and Efik
<b>Population (NBS)</b>	3,727,347	4,248,436	5,482,177	5,527,809	6,537,314	2,277,961	5,741,815	5,860,183	2,892,988

<sup>51</sup> Ethnic groups and geo-political regions in Nigeria Archived from on 2014-01-11. Retrieved 2014-08-29.

<sup>52</sup> National Institutes of Health (NIH)



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Parameter	Abia	Adamawa	Akwa Ibom	Anambra	Bauchi	Bayelsa	Benue	Borno	Cross River
<b>Population Forecasts (2016)</b>									
<b>Population Density</b>	441 persons/ km <sup>2</sup>	86 persons km <sup>2</sup>	634 persons/km <sup>2</sup>	863 persons/km <sup>2</sup>	72 persons/km <sup>2</sup>	158 persons/km <sup>2</sup>	124 persons/km <sup>2</sup>	58 persons/km <sup>2</sup>	143.5 persons/km <sup>2</sup>
<b>Major Occupation</b>	Agriculture, Crafts making, Trading, Civil/Public Service, services, commercial transportation, manufacturing	Agriculture, trade and commerce, livestock herding, civil service, artisanship	Farming and agriculture, crafts making, trading, civil service and fishing	Farming, fishing, crafts making and trading	Farming, fishing, black smithing, crafts and trading	Fishing, agriculture, trade and commerce, transportation	Agriculture, fishing	Farmers, herdsman and fishermen	Farming, fishing
<b>Cultural Resources</b>	Arochukwu Cave, Akwete Weavers, Azumini Blue River, National War Museum, Umuahia, International Conference Centre in Umuahia etc	Njuwa lake, Mandara mountains, Koma hills, Numan Durbar ground, Gashaka-Gumti National Park, and Lamido's palace	National Museum, Uyo, Lord Lugard residence, Mbo Forest Reserve, Maryu Slessor House Tom Slave Masters Lodge, Okopedi, Itu, etc.	Agulu Crocodile Lake, Ogbunike Caves, Igbo Ukwu Museum, etc	Yankari & Premier game reserves, Rock Paintings at Goji & Shira etc.	Oguta lake (Opobo channel), Odi Ogori and Egbe fishing festivals	Gurgul water fall on Katsina – Ala River, Enumabia Warm Spring, Tombs of the first Dutch missionaries etc.	The Lake Chad etc.	Ikom monoliths, the Mary Slessor Tomb, Calabar Drill Monkey Sanctuary, Cross River National Park, Afi Mountain walkway canopy, Kwa falls, Agbokim waterfalls, Tinapa Business Resort etc.
<b>Total Casualty of Road Traffic Cases (RTC) in 2023 1<sup>st</sup> Quarter (Source: FRSC)</b>	96	134	90	135	616	18	1,068	142	328
<b>HIV/AIDs Prevalence (Source: NAIIS<sup>53</sup> 2018)</b>	2.0 %	1.1 %	4.8 %	2.2 %	0.5 %	1.7 %	4.8 %	1.1 %	4.4% (10 <sup>th</sup> position)
<b>Natural Disasters</b>	Flooding, erosion, fire incidents	Flooding, erosion, , fire incidents, windstorms	Oil spills, windstorms, coastal erosion, fire incidents, flooding, land degradation	Drought, windstorms, flooding, erosion	Windstorms, flooding, drought and desertification	Oil spills, land subsidence, tropical storms, flooding and erosion	Drought, erosion and flooding	Flooding, windstorm, drought and desertification	Forest fires, erosion and flooding
<b>Social Issues</b>	Ethnic and Inter-communal conflicts over land and resources,	Boko Haram insurgency and related security challenges,	Tension between host communities and oil companies	Inter-communal conflicts over chieftaincy and land disputes.	Farmer-herder conflicts, Inter-communal clashes between ethnic and	Oil-related conflicts	Farmer-herder conflicts and communal clashes has led to violence	Boko-Haram insurgency and related security threats which has	Inter-communal conflict over land and resources

<sup>53</sup> Nigeria HIV/AIDS Indicator and Impact Survey

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Parameter	Abia	Adamawa	Akwa Ibom	Anambra	Bauchi	Bayelsa	Benue	Borno	Cross River
	unemployment	farmer-herder conflicts, displacement of population due to conflicts and insurgency		Youth unemployment and social unrest.	religious groups, socio-economic challenges such as poverty and lack of infrastructure, epidemics and disease outbreaks such as cholera, meningitis is prevalent		and displacement, infectious diseases such as malaria, cholera and meningitis are prevalent in the state	led to displacement of population and disruption of livelihood	

Parameter	Delta	Ebonyi	Edo	Ekiti	Enugu	Gombe	Imo	Jigawa	Kaduna
<b>Location</b>	6.1967° N 6.7247° E	6.3249° N 8.1137° E	6.3350° N 5.6037° E	7.6244° N 5.2204° E	6.5244° N 7.4344° E	10.2903° N 11.1670° E	5.4836° N 7.0332° E	11.7639° N 9.3384° E	10.5177° N 7.4394° E
<b>Capital City</b>	Asaba	Abakaliki	Benin City	Ado-Ekiti	Enugu	Gombe	Owerri	Dutse	Kaduna
<b>No of LGAs</b>	25	13	18	16	17	11	27	27	23
<b>Geopolitical Zone</b>	South-South	South East	South-South	South West	South East	North East	South East	North West	North West
<b>Bordering States</b>	Edo state to the north, Bayelsa to the west, Rivers state to the south-west, and Ondo state to the northwest	Benue state to the north, Enugu state to the west, Cross Rivers to the south, Abia state to the south-west	Delta state to the south, Ondo to the west, Kogi to the north-east, Anambra to the east	Kwara state to the north, Kogi to the east, Ondo to the south, and Osun to the west	Benue state to the north, Ebonyi to the east, Anambra to the west and Abia state to the south	Bauchi state to the north, Yobe to the northwest, Adamawa to the east and Taraba state to the south	Abia state to the east, Anambra to the north, Rivers to the south and Delta state to the west	Kano state to the east, Katsina to the west, Bauchi to the northeast, Yobe to the east and Kano to the north	Kano to the northwest, Katsina to the north, Niger to the northeast, Zamfara to the west, Kebbi to the west, Plateau to the southeast and FCT to the south
<b>Landmass</b>	17,698 km <sup>2</sup>	5,670 km <sup>2</sup>	17,802 km <sup>2</sup>	6,353 km <sup>2</sup>	7,161 km <sup>2</sup>	20,265vkm <sup>2</sup>	5,530 km <sup>2</sup>	22,410 km <sup>2</sup>	46,053 km <sup>2</sup>
<b>Nature of Soil</b>	Delta State has predominantly alluvial soil, which is fertile due to sediment deposits from the Niger River and its tributaries. It supports various agricultural activities. Soil types includes alluvial soils, sandy loam and clayey soils	Ebonyi State has fertile and well-drained soils, suitable for agriculture. Ultisols, Inceptisols and Alfisols are common soil types found in the state.	Edo State's soil is mainly ferruginous tropical soil with patches of alluvial soil along riverbanks.	Ekiti State's soil is derived from weathered basement rocks, resulting in fertile and well-drained ferruginous tropical soils.	Enugu State has a varied soil composition, including ferruginous tropical soils in lowlands and sandy loam soils in upland areas.	Gombe State is characterized by sandy soils, with some patches of clayey soils and alluvial deposits along riverbanks. Soil fertility varies.	Imo State's soil ranges from Ultisols in upland areas to hydromorphic soils in low-lying areas. It supports various crops.	Jigawa State's soil is mainly sandy, with some clayey soils and alluvial deposits. It supports rainfed agriculture.	Kaduna State has diverse soil types, including sandy soils in the north, clayey soils in the central highlands, and alluvial soils along riverbanks.
<b>Vegetation Types</b>	Delta State features a variety of vegetation	The state's vegetation is predominantly	Vegetation in Edo state includes tropical rainforests,	Ekiti State's vegetation is diverse, ranging	The State's vegetation includes	Gombe State's vegetation is	Imo State's vegetation includes	The vegetation in Jigawa state	Kaduna State's vegetation includes Sudan savanna in the

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Parameter	Delta	Ebonyi	Edo	Ekiti	Enugu	Gombe	Imo	Jigawa	Kaduna
	types, including mangrove forests in the coastal areas, freshwater swamp forests, rainforests, and patches of savanna woodland further inland. The state's vegetation is influenced by its location in the Niger Delta region, characterized by riverine and estuarine ecosystems.	characterized by tropical rainforests and savanna woodlands. The state also features patches of gallery forests along rivers and streams. Agricultural activities have led to the conversion of some forested areas into farmland.	deciduous forests, and savanna woodlands. The state's southern region, bordering the Niger Delta, is characterized by mangrove swamps and freshwater swamp forests. Human activities such as logging, agriculture, and urbanization have impacted the state's vegetation.	from tropical rainforests in the south to montane forests in the hilly areas. The state also features savanna woodlands and grasslands. Human activities, particularly agriculture and deforestation, have altered the natural vegetation to some extent.	tropical rainforests, deciduous forests, and savanna woodlands. The state's vegetation is influenced by its diverse topography, with forested areas in the valleys and savanna grasslands on the plateaus. Agricultural expansion and urbanization have impacted the state's vegetation cover.	predominantly characterized by savanna woodlands and grasslands. The state features both Guinea savanna in the south and Sudan savanna in the north. Human activities such as agriculture, grazing, and fuelwood collection have influenced the state's vegetation dynamics.	tropical rainforests, deciduous forests, and savanna woodlands. The state features patches of gallery forests along rivers and streams. Agricultural expansion and urbanization have led to the conversion of forested areas into farmland and settlements.	is mainly characterized by Sudan savanna, with open grasslands and scattered trees. The state features patches of gallery forests along rivers and streams. Human activities such as agriculture, grazing, and fuelwood collection have impacted the state's vegetation.	north and Guinea savanna in the south. The state also features patches of gallery forests along rivers and streams. Human activities such as agriculture, grazing, and urbanization have influenced the state's vegetation cover.
<b>Average Max. Temperature</b>	Mean temperatures vary between 30°C to 33°C	Mean temperatures range from 30°C to 34°C	Mean temperatures vary between 30°C and 34°C	Mean temperatures range from 28°C to 32°C	Mean temperatures vary from 28°C to 32°C	Mean temperatures range between 32°C and 36°C	Mean temperatures range between 9°C to 33°C	Mean temperatures range from 34°C to 38°C	Mean temperatures vary between 32°C and 36°C
<b>Rainfall</b>	The total rainfall ranges from 1,500mm to 2,500mm	The total rainfall ranges from 1,400 to 2,000mm	The total rainfall ranges from 1,500 to 2,000 mm	The total rainfall ranges from around 1,500 to 2,000mm	The total rainfall ranges from 1,400 to 2,000mm	The total rainfall ranges from 800 to 1,200mm	The total rainfall ranges from 1,400 to 2,000mm	The total rainfall ranges from 600 to 1,000mm	The total rainfall ranges from 800 to 1,200mm
<b>Geology and Terrain</b>	The state is characterized by a low-lying terrain with extensive riverine and estuarine environments. The geology primarily consists of sedimentary deposits, including	The state is characterized by undulating terrain, with hills and valleys. The geology is primarily composed of Precambrian rocks, including granites and gneisses. The landscape features	The state's terrain varies from the low-lying plains of the Niger Delta in the south to undulating hills and plateaus in the north. The geology is dominated by sedimentary formations,	The state is characterized by undulating terrain, with hills and valleys interspersed with plains. The geology consists mainly of basement rocks, including granite	Enugu State's terrain is diverse, ranging from low-lying plains in the southwest to rugged hills and plateaus in the northeast. The state's	The state is characterized by undulating terrain, with hills and plateaus interspersed with valleys. The state's geology is dominated by	Imo State's terrain varies from the low-lying plains of the Niger Delta in the southwest to rolling hills and plateaus in the northeast. The state's geology	Jigawa State's terrain is predominantly flat, with gentle slopes and plains. The state's geology is characterized by	Kaduna State's terrain varies from the low-lying plains of the Niger Valley in the south to rugged hills and plateaus in the north. The state's geology is diverse, including sedimentary rocks, volcanic formations, and granite

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Parameter	Delta	Ebonyi	Edo	Ekiti	Enugu	Gombe	Imo	Jigawa	Kaduna
	sand, clay, and shale, which have accumulated over millions of years. The terrain is predominantly flat, with mangrove swamps along the coast and freshwater swamps inland. Oil and gas reserves are significant geological features in Delta State.	rocky outcrops, especially in the southern parts, while the northern areas are flatter. The state is known for its limestone deposits, which are used in cement production.	including sandstones, shales, and limestone. The Niger River and its tributaries have shaped the landscape, creating floodplains and river valleys.	and gneiss, which form the major landforms. The landscape features forested areas, farmland, and scattered settlements.	geology is characterized by sedimentary rocks, including sandstones, shales, and coal deposits. The Enugu Escarpment, a prominent geological feature, divides the state into distinct physiographic zones. The landscape features coal mining areas, agricultural land, and forested hills.	sedimentary rocks, including sandstones, shales, and limestone formations. The landscape features savanna grasslands, rocky outcrops, and seasonal watercourses.	is characterized by sedimentary rocks, including sandstones, shales, and limestone formations. The landscape features forested areas, agricultural land, and scattered settlements.	sedimentary rocks, including sandstones, shales, and limestone formations. The landscape features savanna grasslands, seasonal rivers, and scattered trees. Agriculture is the primary economic activity in Jigawa State, and irrigation farming is common along river valleys.	intrusions. The landscape features savanna grasslands, rocky outcrops, and river valleys. The state is known for its mineral resources, including tin, columbite, and gemstones.
<b>Major Ethnic Groups</b>	Urhobo, Isoko, Itsekiri, Ijaw, and Aniocha.	Igbo	Edo (Bini), Owan, Esan and Afemai (Etsako & Akoko Edo)	Yoruba	Igbo and Igala	Fulani, Hausa, Tangale, and Tera	Igbo	Hausa, Kanuri and Fulani	Hausa, Fulani, Gbagyi and Adara
<b>Main Native Language</b>	Urhobo, Isoko, Itsekiri, Ijaw, and Igbo	Igbo	Edo (Bini), Etuno, Etsako, Esan, Akelevbu and Okpamheri	Yoruba	Igbo	Hausa	Igbo	Hausa	Hausa
<b>Population (NBS Population Forecasts 2016)</b>	5,663,362	2,880,383	4,235,595	3,270,798	4,411,119	3,256,962	5,408,756	5,828,163	8,252,366
<b>Population Density</b>	227 persons/km <sup>2</sup>	393 persons/km <sup>2</sup>	184 persons/km <sup>2</sup>	375 persons/km <sup>2</sup>	262 persons/km <sup>2</sup>	125 persons/km <sup>2</sup>	725 persons/km <sup>2</sup>	192 persons/km <sup>2</sup>	140 persons/km <sup>2</sup>
<b>Major Occupation</b>	Agriculture, fishing and aquaculture, hunting, trading and commerce, production of crude oil and natural gas	Agriculture, trading and artisanal mining (especially of salt, zinc, limestone and lead)	Oil and gas industry workers, rubber production, agriculture, wood carving, weaving, and trading	Agriculture, trading, artisanal mining (especially of minerals like granite, tin-ore, bauxite, tantalite and clay)	Coal mining, agriculture, trading	Agriculture, animal husbandry (especially cattle rearing), trading	Agriculture, fish farming, and trading	Agriculture, animal husbandry, trading and commerce	Textile manufacturing, oil refinery, Agriculture and trading

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Parameter	Delta	Ebonyi	Edo	Ekiti	Enugu	Gombe	Imo	Jigawa	Kaduna
<b>Cultural Resources</b>	Warri kingdom, Niger Delta cultural centre, Oloibiri Oil well No. 1	Izzi Agba festival, Amancho cave, Ebonyi state college of arts and science	Benin Moat, Royal palace of the Oba of Benin, Benin bronzes, National Museum Benin, Ososo tourist centre, Igwe festival, Igweben cultural carnival	Ikogosi warm springs, Olosunta hills, Ekiti state cultural centre, Osun-Osogbo festival	Ogboide Nsukka cave, Mmanwu festival, Awhum waterfall, Enugu cultural carnival	I angale cultural festival, Boju Boju hills, Kaltungo warm springs, Balanga dam	Mbari cultural art centre, Owerri city amusement park, Orashi river, Oguta lake, Alhajoku festival	Durbar festival, Tiga dam, Hadejia-Nguru wetlands	Kajuru castle, Nok Terracotta sculptures, Kaduna state museum, Kafanchan pottery village
<b>Total Casualty of Road Traffic Cases (RTC) in 2023 1<sup>st</sup> Quarter (Source: FRSC)</b>	204	137	165	49	176	410	118	668	952
<b>HIV/AIDs Prevalence (Source: NAIIS 2018)</b>	1.7%	0.8%	1.8%	0.7%	1.8%	1.2%	1.7%	0,3%	1.0%
<b>Natural Disasters</b>	Flooding, oil spills, erosion, pipeline explosions, fore incidents, coastal erosion, soil erosion	Flooding, erosion, fire incidents, drought	Oil spills, land subsidence, fire incidents, erosion, flooding	Drought, fire incidents, flooding, erosion	Drought, flooding, erosion, fire incidents	Windstorms, land degradation, drought, fire incidents, flooding	Drought, flooding, erosion, fire incidents	Sandstorms, windstorms, heatwaves, flooding, drought and desertification	Flooding, windstorms, land degradation, drought and desertification
<b>Social Issues</b>	Oil related conflicts	Farmer-herder conflicts, poverty and unemployment	Cult-related conflicts, unemployment	Farmer-herder clashes, unemployment	Inter-communal conflicts over land and chieftaincy disputes	Farmer-herder conflicts, poverty	Unemployment and poverty	Farmer-herder conflicts, poverty	Farmer-herder conflicts, ethno-religious tensions and communal clashes, insecurity and banditry in rural areas

Parameter	Kano	Katsina	Kebbi	Kogi	Kwara	Lagos	Nasarawa	Niger	Ogun
<b>Location</b>	11.9895° N 8.6139° E	12.9894° N 7.6018° E	12.4534° N 4.1979° E	7.8008° N 6.7398° E	8.4966° N 4.5427° E	6.5244° N 3.3792° E	8.4975° N 8.5150° E	9.6116° N 6.5627° E	7.1557° N 3.3451° E
<b>Capital City</b>	Kano	Katsina	Birnin – Kebbi	Lokoja	Ilorin	Ikeja	Lafia	Minna	Abeokuta
<b>No of LGAs</b>	44	24	21	21	16	20	13	25	20
<b>Geopolitical Zone</b>	North West	North West	North West	North Central	North Central	South-West	North-Central	North-Central	South West
<b>Bordering States</b>	on the North West by Katsina state, on the North East by Jigawa State, on the South East by Bauchi State and on the South West by Kaduna State.	By Niger Republic to the North, by Jigawa and Kano States to the East, by Kaduna State to the South and by Zamfara State to the West.	By Sokoto State to the North; to the East by Zamfara and Sokoto States; to the South by Niger State and to the West by Benin Republic.	Nasarawa state to the North East, Benue to the East, Enugu state to the South East, Anambra to the South, Edo state to the South West, Ondo & Ekiti states to the West, Kwara	Niger state to the North; Republic of Benin to the West; Kogi state to East and Oyo, Osun and Ekiti States to the south.	Ogun state to the north and east, the Atlantic Ocean to the south and the Republic of Benin to the west	FCT (Abuja) to the west, Benue state to the east, Plateau state to the south, Kaduna and Kogi states to the north	Kebbi state to the northwest, Zamfara to the north, Kaduna to the northeast, Kogi to the southeast, Kwara to the south, and Benue state to the southwest	On the South by Lagos state; on the North by Oyo & Osun states; on the East by Ondo State and on the West by the Republic of Benin.



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Parameter	Kano	Katsina	Kebbi	Kogi	Kwara	Lagos	Nasarawa	Niger	Ogun
				state to the North West and Niger state to the North.					
<b>Landmass</b>	20,131 km <sup>2</sup>	24,192 km <sup>2</sup>	36,800 km <sup>2</sup>	29,833 km <sup>2</sup>	36,825 km <sup>2</sup>	3,345 km <sup>2</sup>	27,117 km <sup>2</sup>	76,363 km <sup>2</sup>	16,980.55 km <sup>2</sup>
<b>Nature of Soil</b>	In their natural state, the soils divide into four main groups. The ferruginous tropical soils formed on crystalline acid rocks occupy about two fifth of the State to the south, southwest and south east; the brown and reddish brown soils and litosols occur in the northern half; the brown and reddish soils are in the north-eastern corner; and the juvenile and hydromorphic soils occur along the alluvial channel complexes	The soils are difficult to work, tending to become waterlogged with heavy rains and to dry out and crack during the dry season. In the north, the drift deposits are coarser, resulting in light sandy soils of buff or reddish colours of low medium fertility. These soils are easily worked and well suited to crops such as millet and groundnut which are less demanding in their requirement than cotton, maize and guinea corn.	In the northern part of the State are the upland and fadama soils. While the upland soils are sandy and well drained, the fadama soils are generally clayey and hydro morphic. In the south and south-eastern parts, the weathering of the Basement Complex rocks has given rise to three types of soils. These are the ferruginous tropical soils, black cotton soils and lithosols	The flood plains of the Niger and Benue River valleys in Kogi State have the hydromorphic soils which contain a mixture of coarse alluvial and colluvial deposits. The alluvial soils along the valleys of the rivers are sandy, while the adjoining laterite soils are deeply weathered and grey or reddish in colour, sticky and permeable.	A large proportion of the land of the state is characterized by ferruginous tropical soils on crystalline acid rocks. The north-eastern part of the state is dominated by red ferralsols on loose sandy sediments.	The state has various soil types, including sandy soils, clayey soils, and loamy soils. Coastal areas often have sandy soils, while inland areas may have more clayey soils. The soil in Lagos is generally fertile, especially in areas where agriculture is practiced.	The state has a diverse range of soil types due to its varied topography, including plains, plateaus, and hills. The soil types in include sandy soils, clayey soils, loamy soils, and alluvial soils. Agricultural activities in Nasarawa State are supported by fertile soils, especially in riverine areas where alluvial soils are prevalent.	Niger State has a mix of soil types, including sandy soils, clayey soils, loamy soils, and lateritic soils. The soil fertility in Niger State varies across different regions, with some areas suitable for agriculture while others are less fertile. Alluvial soils along riverbanks and floodplains are particularly fertile and support agricultural activities such as rice cultivation.	Soils in the northern part of the state are derived from the basement complex rocks and they belong to the red soils. Soils in the southern part of the state is derived from sedimentary rocks. Soils in the southwestern part of the state and most of the western part are sandy. The river valleys have alluvial soils.
<b>Vegetation Types</b>	The natural vegetation consists of the Sudan and the guinea savannah both having been replaced by secondary vegetation. Four fifth of the state	The southern half of the state belongs to the Northern Guinea Savannah Zone, while the north belongs to the Sudan Savannah	The natural vegetation of the State consists of a Northern Guinea Savannah in the south and southeast characterized by medium sized trees and the Sudan Savannah in the	The rain forest belt covers Dekina, Ofu, Ankpa, Olamaboro, Idah and Bassa LGAs with rich deciduous and occasional stunted trees	The vegetation of Kwara state falls into two categories, namely, Rain Forest in parts of Irepodun, Ekiti and Oyun; and Wooded Savannah in	The state is characterized by a mix of vegetation types due to its diverse landscapes, including coastal areas (dominated by mangrove forests, salt marshes, and	The state has diverse vegetation types ranging from Guinea savanna in the north to Sudan savanna in the south. Northern parts of Nasarawa State feature open grasslands and	The State has varied vegetation types, including savannas, woodlands, forests, and wetlands. The northern part of the state is	Ogun State has two main types vegetation, namely, tropical rain forest and guinea savanna. The tropical rain forest is found in the coastal areas and the southern

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Parameter	Kano	Katsina	Kebbi	Kogi	Kwara	Lagos	Nasarawa	Niger	Ogun
	is now composed of farmed parkland, dotted with patches of shrub savannah. There are few forest plantations of exotic trees.	Zone. The vegetation in the south thus consists of broad-leaved species while the northern districts consist of trees that grow long tap roots and thick barks.	North which consists of open wood land with scattered trees	including palms, Iroko, mahogany etc Other LGAs are in the guinea savannah or parkland savannah belt with tall grasses and some trees.	other parts of the state.	sandy beaches), wetlands, Inland areas (may have tropical rainforests, savannas, and grasslands) and.	savannas with scattered trees, while southern areas may have denser vegetation cover. Riverine areas along the Benue and Nasarawa Rivers support gallery forests and riparian vegetation.	characterized by Sahel savanna with sparse vegetation and thorny shrubs adapted to arid conditions. Southern parts of have Guinea savanna and woodland savanna with more dense vegetation cover and a greater diversity of plant species. Riparian vegetation along rivers and floodplains supports lush forests and wetlands, providing habitat for diverse flora and fauna.	part of the state. Rain forests are found in some parts of the eastern parts while Guinea and derived savanna are found in most of the western and northern areas of the state.
<b>Average Max. Temperature</b>	Mean Max. temperatures vary between 24.9°C and 40.5 °C	Mean Max. temperatures vary between 23.7 °C and 40.8 °C	Mean Max. temperatures vary between 28.9 °C and 42 °C	Mean Max. temperatures vary between 28.9 °C and 40.9 °C	Mean Max. temperatures vary between 26.4 °C and 39.4 °C	Mean Max. temperatures vary between 28°C to 32°C	Mean Max. temperatures vary between 32°C to 36°C	Mean Max. temperatures vary between 34°C to 38°C	Mean Max. temperatures vary between 29.7 °C and 40.2 °C
<b>Rainfall</b>	The total annual rainfall ranges from 876mm to 1789mm.	The total annual rainfall ranges from 348mm to 720mm.	The total annual rainfall ranges from 640mm to 1,140mm.	The total annual rainfall ranges from 1200mm to 1,570mm	The total annual rainfall ranges from 1200mm to 1,400mm	The total annual rainfall ranges from 1,500 to 2,000mm	The total annual rainfall ranges from 1,000 to 1,500mm	The total annual rainfall ranges from 800 to 1,200mm	The total annual rainfall ranges from 1000mm to 2000mm.
<b>Geology and Terrain</b>	Generally, Kano is underlain by Basement complex rocks of the Precambrian	Generally, the state has two geological regions. The south and	The geology of Kebbi State is dominated by two formations Precambrian	Kogi state has two main rock types, namely, basement complex rocks	Kwara state is part of the Basement Complex of Nigeria	Lagos State primarily consists of sedimentary formations, including	The State lies within the Benue Trough, characterized by sedimentary rocks such as sandstone,	The state is located within the Nigerian Basement Complex,	Ogun State is an integral part of the Dahomey basin to the south and the western flank of

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Parameter	Kano	Katsina	Kebbi	Kogi	Kwara	Lagos	Nasarawa	Niger	Ogun
	origin. Prolonged weathering of the rocks produced deep clay rich regoliths. The lateritic soil in some part of the upland plain area capped the regolith hills. A narrow strip of the Chad Formation occurs to the east.	central parts of the state are underlain by crystalline rocks of the Basement Complex (from Funtua to Dutsinma), but in the northern parts cretaceous sediments overlap the crystalline rocks.	Basement Complex in the south and south east and young sedimentary rocks in the north. The Basement Complex region is composed of very old volcanic and metamorphic rocks such as granites, schists etc. There are also metasediments such as phyllites and metaconglomerates.	of the Precambrian age in the western half of the state and extending slightly eastwards beyond the lower Niger valley and the older sedimentary rocks in the eastern half. The sedimentary rock groups extend along the banks of Rivers Niger and Benue and south-eastwards through Enugu and Anambra states, to join the Udi Plateau.	considered by various workers to be Precambrian to lower Paleozoic in age. The basement rocks consist of a variety of both migmatized to unmigmatized gneisses, schists, Amphibolite and quartzites intruded by granitic to dioritic rocks.	sandstone, shale, limestone, and clay deposited during the Cretaceous and Tertiary periods. These formations underlie the coastal plains and lagoons. The terrain is characterized by coastal plains, lagoons, wetlands, and mangrove swamps. Inland areas feature undulating topography with low hills and ridges.	shale, limestone, and clay. These formations were deposited during the Cretaceous period and are part of the Benue Basin sequence. The State's terrain includes plains, plateaus, hills, and river valleys. The eastern part of the state features higher elevations and rugged terrain, while the western part consists of flatter plains and valleys.	consisting of ancient crystalline rocks like granite, gneiss, and schist. These rocks form the basement upon which younger sedimentary rocks were deposited. The terrain varies, with rugged highlands in the north-central region and extensive plains in the south. The landscape includes elevated plateaus, escarpments, and river valleys, such as the Kaduna River valley.	the Nigerian basement complex to the south. The south is composed predominantly of cretaceous sediments deposited non-conformably on the much older Nigerian basement complex to the north. This western flank of the Nigerian basement complex lies within the mobile belts separating the West African craton and Gabon craton.
<b>Major Ethnic Groups</b>	Hausa	Hausa – Fulani	Hausa	Igala, Epira and Okun	Yoruba, Nupe, Bariba, Fulani	Yoruba	Agutu, Alago, Basa, Epira, Eggon, Gbagyi, Gwandara, Kanuri and TIV	Hausa, Songhai, Tuareg, Fulani and Kanuri	Egba, Ijebu, Remo, Egbado, Awori and Egun
<b>Main Native Language</b>	Hausa	Hausa	Hausa	Igala, Epira and Okun	Yoruba, Hausa	Yoruba	Agatu, Basa, Eggon, Gbagyi, Gade, Goemai, Gwandara, Ham, Kofyar, and Lijili	Gbari, Gbagyi and Nupe	Yoruba
<b>Population (NBS Population Forecasts 2016)</b>	13,076,892	7,831,319	4,440,050	4,473,490	3,192,893	12,550,598	2,523,395	5,556,247	5,217,716
<b>Population Density</b>	454 persons/km <sup>2</sup>	216 persons/km <sup>2</sup>	77 persons/km <sup>2</sup>	284 persons/km <sup>2</sup>	63 persons/km <sup>2</sup>	2,695 persons/km <sup>2</sup>	69 persons/km <sup>2</sup>	284 persons/km <sup>2</sup>	222 persons/km <sup>2</sup>
<b>Major Occupation</b>	Farming,	Farming,	Farming,	Agriculture,	Farming,	Fishing, farming,	Agriculture,	Agriculture,	Agriculture, mining

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Parameter	Kano	Katsina	Kebbi	Kogi	Kwara	Lagos	Nasarawa	Niger	Ogun
	craftsmanship, trading	Craftsmanship	craftsmanship, fishing	mining	craftsmanship	trade, services, manufacturing industries	livestock rearing, mining, trade and handicrafts	mining, fishing	
<b>Cultural Resources</b>	Kurmi market, Kano's centuries old city wall, Gidan Rumfa (Emir's Palace) etc	Durbar Festival, National Museum Katsina, Emirs Palace in Katsina & Daura	Kanta Museum Argungu, Zuru Museum, Tomb of Abdulahi Fodio, Argungu Fishing festival etc.	Colonial Relics (Lord Lugard House), the Confluence of R. Niger R. Benue	Owu Fall, Imoleboja Rockshelter, Agan Festival, Dada Pottery, Kainji Lake National Park etc	National museum Lagos, Eyo festival, Lagos carnival, Lagos international jazz festival, Brazilian quarter, freedom park, Lagos lagoon, Lekki conservation centre	Farin Ruwa falls, Awhum waterfalls Egoon cultural festival, Ukeleji ruins, and Dutsen Gadara Rock shelter	Gurara falls, Nupe cultural festival, Emir's palace in Bida, Kainji national park, Bida brass works	Omo Forest Reserve, Olumo Rock, Ojude – Oba Festival, Abeokuta Museum etc.
<b>Total Casualty of Road Traffic Cases (RTC) in 2023 1<sup>st</sup> Quarter (Source: FRSC)</b>	505	201	229	494	306	310	637	649	740
<b>HIV/AIDs Prevalence (Source: NAHS 2018)</b>	0.6%	0.3%	0.6%	0.8%	0.8%	1.3%	1.8%	0.6%	1.4%
<b>Natural Disasters</b>	Flooding, droughts, windstorms, sandy desert encroachment, fire incidents, drought	Windstorms, flooding, fire incidents, drought and desertification	Flooding, drought, windstorms, fire incidents	Flooding, erosion, fire incidents, droughts and desertification	Flooding, erosion, fire incidents, drought and desertification	Flooding, coastal erosion, tropical storms, fire incidents,	Flooding, erosion, fire incidents, drought and desertification	Flooding, erosion, desertification, drought, fire incidents	Flooding, erosion, coastal erosion, typical storms, fire incidents
<b>Social Issues</b>	Poverty, inter-communal tension between ethnic and religious groups	Insecurity and banditry, farmer-herder conflicts, poverty	Farmer-herder conflicts, poverty	Farmer-herder conflicts, poverty	Farmer-herder conflicts, poverty and unemployment	Crime and insecurity including armed robbery and gang violence, traffic congestion and accidents	Farmer-herder conflicts, inter-communal clashes between ethnic groups	Farmer-herder clashes, insecurity and banditry, poverty	Inter-communal clashes and land disputes, crime and insecurity, including armed robbery and cult-related violence, unemployment

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Parameter	Ondo	Osun	Oyo	Plateau	Rivers	Sokoto	Taraba	Yobe	Zamfara	FCT
<b>Location</b>	7.2526° N 5.1931° E	7.7714° N 4.5569° E	7.3775° N 3.9470° E	9.9286° N 8.8921° E	4.8156° 7.0498° E	13.0609° N 5.2424° E	8.8931° N 11.3596° E	11.7498° N 11.9662° E	12.1643° N 6.6640° E	9.0579° N 7.4951° E
<b>Capital City</b>	Akure	Osogbo	Ibadan	Jos	Port Harcourt	Sokoto	Jalingo	Damaturu	Gusau	Abuja
<b>No of LGAs</b>	18	30	33	17	23	23	16	17	14	6
<b>Geopolitical Zone</b>	South West	South-West	South West	North Central	South-South	North West	North Central	North-East	North-West	North Central
<b>Bordering States</b>	On the east by Edo state, on the south east by Delta state, on the west by Osun and Ogun states, on the north by Kwara and Kogi states and on the south by the Atlantic Ocean and the Bight of Benin	Ondo State to the east, Oyo State to the west, Kwara State to the north, and Ekiti and Ogun states to the south.	On the east by Osun state, on the west by Ogun state and the Republic of Benin, on the North by Kwara state and on the south by Ogun state	On the north east by Bauchi state, on the north west by Kaduna state, on the south west by Nasarawa state and on the south east by Taraba state	Bayelsa State to the east, Imo, Abia, and Anambra states to the north, and Akwa Ibom State to the east.	To the south and west by Kebbi state, to the south and east by Zamfara state. The state also shares an international boundary to the North with Niger republic.	On the west by Nasarawa and Benue states, on the north west by Plateau state, on the north by Bauchi and Gombe states, on the north east by Adamawa state and on the east and south by Cameroon	Yobe State is bordered by Borno State to the east, Jigawa State to the west, Bauchi and Gombe states to the south, and Niger Republic to the north.	Zamfara State is bordered by Kebbi State to the west, Sokoto State to the north, Katsina State to the east, and Niger State and the Federal Capital Territory to the south.	Nassarawa State to the north, Niger State to the west, Kaduna State to the northeast Kogi State to the southwest
<b>Landmass</b>	15,500 km <sup>2</sup>	9,251km <sup>2</sup>	28,454 km <sup>2</sup>	30,913km <sup>2</sup>	11,077 km <sup>2</sup>	25,973 km <sup>2</sup>	54,473 km <sup>2</sup>	45,502 km <sup>2</sup>	39,762 km <sup>2</sup>	7,315 km <sup>2</sup>
<b>Nature of Soil</b>	The soils, classified as Ondo association, are of high agricultural value. But to the northeast, the soils are skeletal in nature and are of comparatively recent origin. In the southern part, the older sand ridge complexes develop brown and orange sandy soils, while the most recent ones	The soil in Osun is predominantly lateritic, characterized by red or yellowish-red coloration due to iron oxide content. It tends to be acidic and well-draining, suitable for cultivation of crops like cocoa, yam, and cassava.	Much of Oyo state is covered by the fertile loamy soils derived mainly from the Precambrian horn blende-biotite gneiss. In the forest zone of the southern parts of the state, the soils include clay, laterite and thick rich dark loamy and humus components. Northwards, the soils are lighter and become a mixture of laterite and fine	The major soil units of Plateau state belong to the broad category of tropical ferruginous soils, which are much thinner on the high plateau but attain greater depths in the southern part of the state. There are also sizeable pockets of loamy soil of volcanic origin in the high Plateau. Those soil groups respond quite well to fertilizers. Soil erosion is an environmental problem on the Jos Plateau	The soil in Rivers State varies, including coastal sands in the southern region, alluvial soils along riverbanks, and clayey soils in upland areas. These soils support diverse vegetation and agricultural activities such as oil palm cultivation.	To the north of the state, especially along the border with Niger Republic, undulating plains are covered by Aeolian deposits of variable depth. The sandy soil with clayey subsoil is common in the south, except along the flood plains of the river valleys where alluvial soils predominate.	Most of the lowland area is made up of ferruginous tropical soils which developed on crystalline acid rocks and sandy parent materials. The upland areas, especially the Mambilla Plateau, are covered by humid ferrosols and lithosols which are highly weathered and markedly lateritized, due to leaching	Yobe's soil is mostly sandy and sandy-loamy, typical of the Sahel region. It is generally low in organic matter and nutrients, posing challenges for agriculture. However, irrigation schemes along the Komadugu-Yobe River provide fertile soils conducive to farming.	Zamfara's soil is predominantly sandy and sandy-loamy, with patches of clayey soils in some areas. The soil fertility varies across the state, with more fertile soils found in riverine plains and valleys, suitable for crop cultivation and grazing activities.	The soil in the FCT is predominantly sandy, with some areas characterized by sandy-loamy soils. Additionally, patches of clayey soils are found throughout the territory. The soil composition varies due to the diverse geology of the region, including rocky outcrops and sedimentary formations.



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Parameter	Ondo	Osun	Oyo	Plateau	Rivers	Sokoto	Taraba	Yobe	Zamfara	FCT
	near the coast have light grey sandy soils. The swamp flats affected by tide bear saline soils.		grained loamy and humus materials which support poorer vegetation							
<b>Vegetation Types</b>	The natural vegetation is the rain forest, composed of many varieties of hardwood timber such as <i>Melicia excelsa</i> . In the northern districts, the vegetation consists of woody savanna featuring such tree species as <i>Bilghia sapida</i> . The swamp flats are the domain of the fresh water swamp forests in the interior and the units of mangrove vegetation near the coast	Osun State, located in southwestern Nigeria, features diverse vegetation types ranging from tropical rainforests in the south to savannah woodlands in the north. The state is characterized by lush forests, including remnants of the Olokemeji Forest Reserve, interspersed with grasslands and shrublands, supporting a rich variety of flora and fauna.	The vegetation of the state consists of the rain forest in the southern parts of the state and derived savannah in the northern part of the state. The composition of the rain forest is basically the large tall crowned trees, mixed with thick undergrowth	Plateau state falls largely within the northern guinea savannah zone which consists mainly of short trees, grasses and the plateau type of mosaic vegetation. Near some villages are thick hedges of cacti, which have been planted around household farms or compound lands. Fringing woodlands or gallery forests can be found along some river valleys	Rivers State in Nigeria is characterized by diverse vegetation, including dense rainforests, mangrove swamps along the coast, and savanna woodlands inland. The state's lush greenery supports a wide variety of flora and fauna, contributing to its ecological richness and biodiversity.	The state occupies an area of short grass savanna vegetation in the south and thorn scrub in the north. A generally arid region that gradually merges into the desert across the border in Niger republic, the whole state falls within the Sudan savannah	The vegetation may be classified into three broad types: the northern guinea, the southern guinea and the mountain grassland and forest vegetation. The boundary between the northern guinea corresponds fairly closely with the 130mm mean annual rainfall isohyet, while the mountain forest and grassland vegetation occur mainly on the Mambila plateau.	Yobe State, situated in northern Nigeria, features predominantly arid and semi-arid vegetation types such as desert shrublands and thorn savannahs. Acacia trees, shrubs, and grasses adapted to dry conditions dominate the landscape, with sparse vegetation cover. The region's flora reflects its arid climate and Sahelian ecological zone.	Zamfara State's vegetation primarily consists of savanna woodland, characterized by scattered trees and shrubs adapted to the semi-arid climate. Acacia and baobab trees dot the landscape, interspersed with grasses and occasional patches of thorny scrub. This vegetation supports diverse wildlife and serves as grazing land for livestock.	The FCT exhibits various vegetation types, predominantly characteristic of savanna grasslands with scattered trees and shrubs. These vegetation types include: Savanna grassland, woodland savanna, gallery forests, shrublands, and grasslands with riparian vegetation
<b>Average Max. Temperature</b>	Mean Max. temperatures vary between 27.5° C and 40.0° C	Mean Max. temperature ranges from 25°C to 30°C.	Mean Max. temperatures vary between 26.5° C and 35.0 ° C	Mean Max. temperatures vary between 23.3° C and 33.4° C	Mean Max. temperatures ranges from 27°C to 32°C	Mean Max. temperatures vary between 28.9° C and 41.9 ° C	Mean Max. temperatures vary between 29.4° C and 39.6 ° C	Mean Max. temperatures ranges from 30°C to 40°C.	Mean Max. temperatures ranges from 28°C to 35°C.	Mean Max. temperatures ranges from 30°C to 35°C
<b>Rainfall</b>	The total annual rainfall ranges from 1800mm to 2000mm.	The average annual rainfall is between 1,200mm to 1,500mm.	The total annual rainfall ranges from 1200mm to 1800mm in the south and	The total annual rainfall ranges from 1300mm to 1500mm.	The average annual rainfall of about 2,500mm to 3,500mm	The total annual rainfall ranges from 630mm to 1150mm.	The total annual rainfall ranges from 900mm to 1300mm.	The average annual rainfall of about 500mm to 800mm.	The average annual rainfall ranges from 500mm to 1,200mm.	The total annual rainfall ranges from 1000mm to 1500mm.

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Parameter	Ondo	Osun	Oyo	Plateau	Rivers	Sokoto	Taraba	Yobe	Zamfara	FCT
			800mm to 1500mm in the north							
<b>Geology and Terrain</b>	<p>There are two distinct geological regions in Ondo state. First, is the region of sedimentary rocks in the south, and secondly, the region of Precambrian basement complex rocks in the north. Some few kilometres north of Aaye occurs the basement complex sedimentary rocks boundary. The sedimentary rocks are mainly of the post cretaceous sediments and the cretaceous Abeokuta Formation. The basement complex is mainly of the medium grained gneisses</p>	<p>Osun State is situated in the southwestern region of Nigeria and has a diverse topography with hills, valleys, and rivers. The state lies on the Yoruba section of the Niger Delta, which is characterized by several rivers and water bodies. The state's geology is characterized by the presence of ancient basement complex rocks, sedimentary rocks of the Cretaceous period, and unconsolidated sediments in the coastal zone. These diverse geological formations and topography contribute to the unique environmental, agricultural, and socio-economic characteristics of Osun State.</p>	<p>Oyo state lies in the south western part of Nigeria. Underlain by three lithological units of the crystalline basement complex, comprising migmatite gneiss complex (quartzite, gneissic rocks), low to medium grade metasediments (green schists facies, namely quartz schist and mica schist), the Pan African granitoids (older granites) which are late tectonic intrusions. With these composites of rocks, Oyo state has various minerals ranging from metallic, non-metallic, or industrial minerals to various grades of gemstones</p>	<p>The Jos plateau, an erosional relic covering an area of about 7,780 sq.km., is a product of distinct phases of volcanic activities when younger granite rocks extensively intruded into the older basement complex rocks. Each phase of volcanic activities was followed by a long period of weathering and erosion when tin bearing rocks were deposited in the valleys and buried from subsequent volcanic eruptions</p>	<p>The geology and terrain of Rivers State are shaped by its location in the Niger Delta region, resulting in a diverse topography with coastal plains, floodplains, river valleys, and upland terraces. The state's geology is predominantly composed of sedimentary rocks, which have been shaped by millions of years of fluvial and marine processes. These diverse geological formations and topography contribute to the unique environmental, agricultural, and socio-economic characteristics of Rivers State.</p>	<p>With the state, there is no outcrop of basement complex. Rather, it is covered by a series of sedimentary rocks, which have been deposited over the basement complex. These sediments were laid down under varied environmental situations ranging from continental to marine events. The sedimentary rocks include Gundumi, Gwandu formations and Rima Sokoto groups.</p>	<p>The state may be divided into three topographic regions namely: the extensive Fadama swamps of the Muri plains, hills on sedimentary formations and the Plateau developed on basement complex rocks. The Mambilla Plateau forms the watershed from which the major drainage systems in Taraba state take their source.</p>	<p>Yobe State is situated in the northeastern part of Nigeria and has a semi-arid Sudan savanna geography. The state features vast plains, low hills, and sandy dunes. Yobe State, situated in the northeastern part of Nigeria, features a diverse geology and terrain characterized by vast plains, plateaus, and inselbergs. The state's geology primarily consists of sedimentary and basement complex rocks, which have been formed and transformed over millions of years through various geological processes.</p>	<p>Zamfara State's geology and terrain contribute to its unique environmental, agricultural, and socio-economic characteristics. The Basement Complex and Younger Granites host various mineral resources, such as gold, lead, zinc, and silver, which are essential for the state's economy. The Miocene Sedimentary Formations and the Younger Granites provide fertile soils suitable for agriculture, especially in the northern and central parts of the state. Zamfara State has a diverse geology and terrain, with the Basement Complex, the Miocene Sedimentary Formations, and the Younger Granites representing its primary geographical features. These diverse landscapes and geological formations contribute to the state's rich natural resources and agricultural potential.</p>	<p>The terrain is characterized by diverse geological features including rocky outcrops, particularly in the northern and southwestern parts. These rocky areas often consist of granite outcrops and other formations. In addition to rocky terrain, the FCT encompasses plains and valleys, particularly along riverine areas. The geology also includes sedimentary formations, contributing to the variety of soil types found in the region. Overall, the terrain of the FCT ranges from rocky hills and plateaus to flat plains, with varying elevations across the territory</p>

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Parameter	Ondo	Osun	Oyo	Plateau	Rivers	Sokoto	Taraba	Yobe	Zamfara	FCT
<b>Major Ethnic Groups</b>	Akoko, Akure, Okitipupa, Ilaje, Ondo, and Owo.	Yoruba, Igbomina, Akura, and Ijesha.	Oyo, Oke- Ogun, Ibadan, Ibarapa	Multi ethnic and includes Berom Afizere, Amo, Anaguta, Aten, Buji, Chip, Fier, Gashish, Goemai, Irigwe, Jarawa, Jukun, Kofyar etc.	Ijaw, Ogoni, Ikwerre, and Etche.	Sunni Muslims (Majority) and Shia Muslims (Minority).	Multi ethnic and includes Fulani, Mumuye, Jukun, Jenjo, Kuteb, Chamba and Mambilla etc	Kanuri, Bura, Ngizim, and Bolewa.	Hausa, Fulani, Kamuku, and Zamfarawa.	Gwan, Koro, Ganagana, Gwandara, Afo and Bassa
<b>Main Native Language</b>	Yoruba	Yoruba	Yoruba	Hausa	Ijaw, Ogoni, Ikwerre, and Etche	Hausa	Fulfulde, Hausa, Mumuye and Jukun etc.	Hausa, Kanuri, Bura, Ngizim, and Bolewa	Hausa and Fulfulde	Gbagyi and Hausa
<b>Population (NBS Population Forecasts 2016)</b>	4,671,695	4,705,589	5,580,894	4,200,442	7,303,924	4,998,090	3,066,834	3,294,137	4,515,427	3,564,126
<b>Population Density</b>	236 persons/km <sup>2</sup>	334 persons/km <sup>2</sup>	204 persons/km <sup>2</sup>	55 persons/km <sup>2</sup>	468 persons/km <sup>2</sup>	142 persons/km <sup>2</sup>	54 persons/km <sup>2</sup>	51 persons/km <sup>2</sup>	82 persons/km <sup>2</sup>	192 persons/km <sup>2</sup>
<b>Major Occupation</b>	Agriculture, mining	Agriculture, Fishing, and Trading	Agriculture	Agriculture, mining	Oil and Gas Industry, Agriculture, Trading	Agriculture, livestock production	Agriculture, livestock production, fishing	Farming (mainly subsistence agriculture), Animal Husbandry, Trading	Agriculture, Mining (especially gold mining), Animal Husbandry	Civil service, commerce, trade, services, agriculture, private sector
<b>Cultural Resources</b>	Deji of Akure's Palace, Idanre Hills, Igbokoda Waterfront, Ebomi Lake Tourist Centre, Owo Museum of Antiques etc	Rich Yoruba culture, festivals such as the Ose Festival, Igogo Festival, and Olojo Festival, which celebrate the history, spirituality, and communal identity of the Yoruba people.	Agodi Botanical Garden, Ado-Awaye Suspended lake, Cocoa House, Oyo National Park etc	The Wildlife Safari Park, National Museum Jos, Pandam Game Reserve, Assop & Kurra Falls etc	Cultural landmarks in Rivers State include the Port Harcourt Cultural Centre and the National Museum in Port Harcourt, which preserve and promote the diverse cultural heritage of the state.	Sultan's Palace, Tomb of Usman Dan Fodio, Waziri Junaid History & Culture Museum, Sokoto Museum etc	Mambilla Plateau Gembu, Barup Waterfalls, Marmara Crocodile Pond Wukari etc.	Yobe State celebrates various cultural festivals and ceremonies, including the Durbar Festival and the Bade Fishing Festival, which attract visitors from across the country.	The state celebrates traditional festivals such as the Sallah Festival, which marks the end of Ramadan, and the Argungu Fishing Festival, which attracts participants from different parts of Nigeria.	National Mosque, Abuja, Garki Arts and Crafts Market, National Christian Centre, Abuja, Arts and Culture, National Children's Park and Zoo, Millennium Park, Abuja National Stadium, National Library of Nigeria, Abuja, Durbar Festival,
<b>Total Casualty of Road Traffic Cases (RTC) in 2023 1<sup>st</sup> Quarter</b>	280	358	507	283	59	174	200	272	126	918

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Parameter	Ondo	Osun	Oyo	Plateau	Rivers	Sokoto	Taraba	Yobe	Zamfara	FCT
(Source: FRSC)										
HIV/AIDs Prevalence (Source: NAHS 2018)	1.0%	0.9%	0.9%	1.5%	3.6%	0.4%	2.6%	0.4%	0.4%	1.4%
Natural Disasters	Fire incidents, tropical storms, coastal erosion, soil erosion, and flooding	Urban flooding, erosion, fire incidents, heatwaves	Urban flooding, erosion, fire incidents, heatwaves	Drought, flooding, erosion	Flooding, erosion, oil spills, saltwater intrusion, tidal surges and storm surges	Windstorms, sandstorms, heatwaves, floods, drought and desertification	Flooding, erosion, drought and desertification, windstorms	Droughts and desertification, floods, sandstorms, heatwaves	Flooding, desertification and drought, erosion, windstorms, bushfires and heatwaves	Flooding, erosion, drought, wildfires
Social Issues	Farmer-herder conflicts, poverty	Unemployment and poverty	Farmer-herder conflicts, poverty	Persistent ethno-religious conflicts between various ethnic groups, communal conflicts leading to displacement, farmer-herder clashes, insecurity and banditry especially in rural areas	Inter-communal tensions and clashes over land, poverty, militancy and agitation for resource control in the Niger Delta region	Insecurity and banditry, especially along the state's border areas, farmer-herder conflicts, poverty, food insecurity as a result of drought and desertification	Farmer-herder conflicts, ethnic and religious tensions between different communities (inter-communal clashes), insecurity and banditry, especially in rural areas	Boko-Haram insurgency and related security challenges, farmer-herder conflicts, humanitarian crisis and displacement of populations, food insecurity as a result of drought and desertification	Insecurity and banditry, particularly in rural areas, conflict over control of mining sites and revenue generation	Youth unemployment, Security Concerns – Crime, theft, and vandalism

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

# CHAPTER 5 – POTENTIAL KEY ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

## 5.1 Impact Assessment and Prediction (As Per Relevant ESSs)

For the assessment and management of E&S risks and impacts associated with RAAMP-SU implementation, an impacts assessment and prediction methodology is summarized in sub-section 5.1.1 below. The methodology is shown in order to guide SPIUs on how to identify E&S risks and impacts during the screening of their proposed sub-projects/intervention works (a requisite activity for overall ESMF implementation). Similarly, the methodology shall guide E&S Consultants procured to prepare E&S instruments under the project. It is imperative that E&S risks and impacts are properly assessed, and the magnitude of the impacts expertly predicted. Importantly, the impact assessment and prediction methodology, takes into consideration E&S risks and impacts for which the ESSs relevant to RAAMP-SU address. This is to ensure that the requirements of these ESSs are met in the preparation of respective E&S instruments, implementation of management plans and mitigation measures as well as monitoring.

### 5.1.1 Impact Assessment Methodology

The impact assessment methodology and techniques used for identifying and assessing the potential E&S risks and impacts will involve a “5-Step approach in line with the Leopold Matrix<sup>54</sup>. See Figure 13 below. This methodology has been applied to identify and assess potential E&S risks and impacts of proposed sub-projects/intervention works captured under the RAAMP-SU Components (importantly A and B - repairing, and strengthening of old bridges and culverts, ii) slope stabilization iii) erosion protection improvements, iv) surface repairs or resurfacing and other engineering solutions, and v) maintenance of 3,500 km of rural roads, vi) upgrade of about 3,000 km rural roads, etc.). The 5 steps applied are as follows:

**Step 1:** Impact Identification - Interaction between sub-projects/intervention works and environmental and social sensitivities (taking into consideration ESS 1-6; 8 & 10)

**Step 2:** Qualification of impacts; positive/negative, Direct/Indirect, Short/Long term, Site-specific/Widespread, Reversible/Irreversible

**Step 3:** Rating of Impact Likelihood

**Step 4:** Degree of Impact Significance - Major, Moderate, Moderately High, Moderately Low

**Step 5:** Impact Assessment Matrix

#### Step 1: Identification of Potential Impacts

Potential impacts shall be determined based on **anticipated interactions** between sub-projects/intervention works and major environmental and social sensitivities considered primarily under the relevant ESSs. The identification shall be done through technical examination of the scope and nature of construction works required, onsite prediction of what potential E&S risks and impacts may be as a result of the sub-project, previous experience on similar jobs, concerns raised by stakeholders during focus group discussions and public consultations, and interactions with professionals and experts in the field.

<sup>54</sup> The **Leopold matrix** is a qualitative environmental and social impact assessment method used to identify and assign numerical weightings to potential environmental and social impacts of proposed projects on the environment.



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### Step 2: Categorization of Impacts

In order to further qualify the impacts of the various sub-projects/intervention works on the biophysical and socioeconomic environment, the identified impacts shall be **characterized** based on the following; beneficial, adverse, direct, indirect, cumulative, reversible, irreversible, residual, short-term and long-term impacts.

### Step 3: Rating of Impact Likelihood

This is an assessment of the probability of the impacts occurring. Table 11 below illustrates **evaluation/rating** based on probability, likelihood and frequency of occurrence of the impacts.

**Table 11: Likelihood of Occurrence of Impact**

Impact Probability	Likelihood	Frequency
High probability (80-100%)	A very likely impact	Very frequent impacts
Medium high probability (60-79%)	A likely impact	Frequent impacts
Medium probability (40-59%)	A possible impact	Occasional impacts
Medium low probability (20-39%)	An unlikely impact	Few impacts
Low probability (0-19%)	A very unlikely impact	Rare impacts

### Step 4: Potential Consequence

This is the actual **result and scale** of the **effect** which an impact might have. The application of each of the two characteristics is described in Table 12 below.

**Table 12: Potential Consequences**

Potential Consequence	Effect
Extreme consequence	A massive effect
Great consequence	A big effect
Considerable consequence	A substantial effect
Little consequence	A slight effect
Hardly any consequence	A trivial effect

### Step 5: Degree of Significance

At this stage, the impact rating shall be determined based on its **significance/potential consequence**. Table 13 below shows the impact significance with associated impact ratings.

**Table 13: Degree of Impact Significance**

Impact Significance	Impact Ratings
Major Significance	Major Impact
Moderate Significance	Moderate Impact
Minor Significance	Minor Impact
Negligible Significance	Negligible Impact

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### Step 6: Impact Assessment Matrix

The final impact assessment shall be rated based on the likelihood of occurrence and potential consequence of the impact; after the rating of each impact, the determination of mitigation measures will follow accordingly. Figure 13 shows the Leopold Impact Risk Assessment Matrix.

		Potential consequences				
Likelihood	Positive	Negative				
		Hardly any	Little	Considerable	Great	Extreme
High		Moderate	Moderate	Major	Major	Major
Medium high		Minor	Moderate	Moderate	Major	Major
Medium		Minor	Minor	Moderate	Moderate	Major
Medium low		Negligible	Minor	Minor	Moderate	Moderate
Low		Negligible	Negligible	Minor	Minor	Moderate

Figure 13: Leopold Impact Risk Assessment Matrix

## 5.2 Potential Key Environmental and Social Risks and Impacts of Sub-Projects (As Per Relevant ESSs)

The key potential E&S risks and impacts associated with proposed sub-projects/intervention works under RAAMP-SU (Components A and B) are provided in sub-sections 5.2.1 - 5.2.4 Section 5.2.1 enumerates the potential beneficial E&S impacts associated with the implementation of the RAAMP-SU Components. Furthermore, sub-sections 5.2.2 – 5.2.4 summarizes the potential adverse E&S impacts in relation to the ESSs.

### 5.2.1 Potential Beneficial Environmental and Social Impacts

Envisaged environmental and social risks and impacts associated with RAAMP-SU implementation, will arise mainly from the implementation of **Component A (Sub-component A.1 activities – Rehabilitation/Upgrade of about 3,000 km rural roads, repairing, and strengthening of old bridges and culverts, Slope stabilization, Erosion protection improvements, Surface repairs or resurfacing)** and **Component B (Sub-component B.1 activities – Maintenance of 3,500 km of rural roads)**. Some beneficial impacts associated with sub-projects/intervention works implementation under RAAMP-SU across the 36 states and the FCT have been identified, these include:

- Improve the institutional arrangement for rural roads and provide sustainable funding for its maintenance in prospective states.
- Intervention works will help reduce the risk of erosion and flooding in communities within the corridor of selected sites as a result of proper drainage and culvert construction.
- Rural roads rehabilitation will improve the transportation of agricultural products and commodities to markets, reducing post-harvest losses therefore promoting more efficient and sustainable farming practices.
- Institutional Strengthening - Supporting state Ministries, Departments and Agencies (MDAs), RARAs, CBOs, NGOs, and Development Partners, etc. in provision of technical assistance, guidance and monitoring of road rehabilitation activities undertaken across the states.
- Encourage direct and indirect investments in the agricultural and rural development sector.
- Improve access to social services including schools, religious areas, healthcare facilities etc.
- Rehabilitation of rural roads will improve transportation infrastructure, making it easier for the locals to commute.
- The proposed sub-projects/intervention works will positively impact women by providing them with easier access to markets, education, and healthcare (where available). This can contribute to women's

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empowerment and participation in economic and social activities. Additionally, women and children who have to walk across the narrow rugged rural roads to fetch water and wash clothes will have better and safer access to water points due to the sub-projects/intervention works.

- The project will generate employment, including long-term jobs for maintenance crews responsible for the routine maintenance of rural roads.

### 5.2.2 Potential Adverse Environmental and Social Risks and Impacts Related to Project Siting (Pre-Construction/Pre-Rehabilitation Phase)

The potential adverse E&S risks and impacts related to project siting (pre-construction/pre-rehabilitation phase) including their Likelihood of Occurrence, Consequence and Degree of Significance are summarized in Table 14 below.

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**Table 14: Potential Adverse E&S Risks and Impacts During Project Siting (Pre-Construction/Pre-Rehabilitation) and Relationship to Relevant ESSs**

Pre- Rehabilitation/Pre-Construction Phase				Likelihood	Consequence	Degree	Relationship with Relevant ESSs
		Environmental Risks	Environmental Impacts				
Negative	Air	<ul style="list-style-type: none"> <li>Air Pollution</li> </ul>	<ul style="list-style-type: none"> <li>The release of fugitive dusts, and fibrils during offload of construction materials, site clearing, siting of staging areas and workers campsites, etc.</li> <li>Carbon emissions from exhaust fumes of vehicles during mobilization/transportation of equipment to project locations</li> </ul>	Medium high	Considerable	Moderate	ESS1, ESS3, ESS 10
	Soil	<ul style="list-style-type: none"> <li>Soil contamination/ compaction</li> </ul>	<ul style="list-style-type: none"> <li>Localized loss of topsoil due to stacking of heavy-duty equipment</li> <li>Leakages may occur from stacked equipment containing oil which could result in the seeping-through of oil into the soil, thereby leading to possible contamination of soil</li> </ul>	Low	Little	Minor	ESS 1, ESS 3, ESS 10
	Waste	<ul style="list-style-type: none"> <li>Waste generation</li> </ul>	<ul style="list-style-type: none"> <li>Generation of vegetative debris and other organic material, such as branches, leaves, grass, and other plant matter during land clearing activity.</li> </ul>	High	Considerable	Minor	ESS 1, ESS 3, ESS 10
	Noise	<ul style="list-style-type: none"> <li>Noise pollution</li> </ul>	<ul style="list-style-type: none"> <li>Noise impacts are envisaged during siting of staging areas and workers campsite, relocation of structures within the ROW etc.</li> </ul>	Low	Little	Negligible	ESS 1, ESS 3, ESS 10
		Occupational Health and Safety Risks	Occupational Health and Safety Impacts				
Negative	Health and Safety at Work	Exposure to dust and harmful fumes	Air pollution from dust and exhaust fumes of vehicles and equipment resulting to OHS risks e.g. respiratory infections and diseases	Medium high	Little	Moderate	ESS 1, ESS 2, ESS 3, ESS 10
		Exposure to increase in baseline noise level	Exposure of workers to increased noise pollution during movement of equipment to work areas and offloading of construction materials	Low	Little	Negligible	

Pre- Rehabilitation/Pre-Construction Phase				Likelihood	Consequence	Degree	Relationship with Relevant ESSs
		Social Risks	Social Impacts				
Negative	Noise	<ul style="list-style-type: none"> <li>Noise level increases</li> </ul>	<ul style="list-style-type: none"> <li>Noise during pre-rehabilitation activities is envisaged.</li> </ul>	Medium	Low	Minor	ESS 1, ESS 2, ESS 3, ESS 4, ESS 10
	Grievances	<ul style="list-style-type: none"> <li>Grievances, Complaints, Disruption of Activities and Vandalization</li> </ul>	<ul style="list-style-type: none"> <li>Grievances from community locals as a result of relocation of structures within the ROW</li> <li>Negative impact on host community dynamics as an outcome from labour influx</li> <li>Intrusion into farmlands and possibly sacred sites</li> </ul>	High	Considerable	Major	ESS 1, ESS 2, ESS 4, ESS 5, ESS 8, ESS 10
	Conflicts of Interest	<ul style="list-style-type: none"> <li>Risk of conflicts</li> </ul>	<ul style="list-style-type: none"> <li>Possible conflicts of interest between (Contractors, interest groups, community associations, RAAMP-SU project staff)</li> <li>Possible conflicts between Project Affected Persons (PAPs) and contractors</li> </ul>	Medium	Considerable	Minor - Moderate	ESS 1, ESS 2, ESS 4, ESS 10

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Pre-Rehabilitation/Pre-Construction Phase				Likelihood	Consequence	Degree	Relationship with Relevant ESSs
		Social Risks	Social Impacts				
	Traffic	<ul style="list-style-type: none"> <li>Delayed travel time</li> </ul>	<ul style="list-style-type: none"> <li>Traffic impacts may occur during transport of materials</li> </ul>	Medium	Low	Minor	ESS 1, ESS 4, ESS 10
	Accident	<ul style="list-style-type: none"> <li>Injuries and possible deaths</li> </ul>	<ul style="list-style-type: none"> <li>Incidents and/or accidents may occur during transportation of materials to project site.</li> </ul>	Medium high	Great	Major	ESS 1, ESS 2, ESS 4, ESS 10
	Displacement	<ul style="list-style-type: none"> <li>Economic and Physical Displacement</li> </ul>	<ul style="list-style-type: none"> <li>Displacement or relocation of persons (Mainly owners of structures and farmlands within the ROW.</li> </ul>	High	Great	Major	ESS 1, ESS 5, ESS 10

### 5.2.3 Potential Adverse Environmental and Social Risks and Impacts During Project Implementation (Construction/Rehabilitation Phase)

The potential adverse E&S risks and impacts during project implementation (construction/rehabilitation phase), Impacts Likelihood, Consequence and Degree of Significance are summarized in Table 15 below. The relationship of the impacts to the relevant ESSs is also provided.

**Table 15: Potential Adverse E&S Risks and Impacts During Project Implementation (Construction/Rehabilitation Phase) and Relationship to Relevant ESSs**

Rehabilitation/Construction Phase				Likelihood	Consequence	Degree	Relationship with Relevant ESSs
		Environmental Risks	Environmental Impacts				
Negative	Air	<ul style="list-style-type: none"> <li>Air Pollution</li> </ul>	<ul style="list-style-type: none"> <li>Air Pollution from fugitive dusts and carbon emissions from exhaust fumes during civil works and operation of work vehicles and equipment, respectively</li> </ul>	Medium high	Considerable	Moderate	ESS 1, ESS 3, ESS 10
	Soil	<ul style="list-style-type: none"> <li>Soil Pollution</li> </ul>	<ul style="list-style-type: none"> <li>Soil Pollution: Leakages from construction wastes such as disused oil (fuel, lubricants), cement, and paint may occur</li> </ul>	Low	Little	Minor	ESS 1, ESS 3, ESS 10
	Noise	<ul style="list-style-type: none"> <li>Noise level increases</li> </ul>	<ul style="list-style-type: none"> <li>Noise level increase during civil works and operation of work vehicles and equipment</li> </ul>	Medium high	Considerable	Moderate	ESS 1, ESS 2, ESS 3, ESS 10
	Energy	<ul style="list-style-type: none"> <li>Energy wastage</li> </ul>	<ul style="list-style-type: none"> <li>Energy wastage due to inefficient or unnecessary consumption of energy resources e.g., diesel, electricity</li> </ul>	High	Little	Minor	ESS 1, ESS 3, ESS 10
	Waste Generation	<ul style="list-style-type: none"> <li>Generation of CD-wastes</li> </ul>	<ul style="list-style-type: none"> <li>Significant amounts of wastes will be generated onsite. Construction and Demolition Wastes (such as disused concrete, asphalt, bricks, stones/masonry wastes, wood, metals, soil and rocks, etc.) as well as Hazardous Wastes such as chemicals (paints, solvents, adhesives, and sealants used for road markings, signs, and structures); Petroleum Products (Including fuel, oil, and lubricants used in construction machinery and vehicles), food wastes etc.</li> </ul>	Medium	Considerable	Moderate	ESS 1, ESS 3, ESS 10
	Water Resources	<ul style="list-style-type: none"> <li>Surface water contamination</li> </ul>	<ul style="list-style-type: none"> <li>Possible pollution of surface water via oil/lubricant spills from machinery, batteries acid etc.</li> <li>Construction of river crossings may result in sediment runoffs in nearby streams/rivers</li> </ul>	Medium	Considerable	Moderate	ESS 1, ESS 3, ESS 4, ESS 6, ESS10



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Rehabilitation/Construction Phase				Likelihood	Consequence	Degree	Relationship with Relevant ESSs
	Natural Habitats	<ul style="list-style-type: none"> <li>Impacts on Natural Habitats</li> </ul>	<ul style="list-style-type: none"> <li>Possible disruption of local habitats and wildlife during excavation</li> </ul>	Medium	Little	Minor	ESS 1, ESS 6, ESS 10

Rehabilitation/Construction Phase				Likelihood	Consequence	Degree	Relationship With Relevant ESSs
Negative	<b>Social Risks</b>		<b>Social Impacts</b>				
	Noise	<ul style="list-style-type: none"> <li>Noise level increases</li> </ul>	<ul style="list-style-type: none"> <li>Residents of communities may experience unusual noise specifically, from civil works and use of heavy machineries.</li> </ul>	Medium high	Considerable	Moderate	ESS 1, ESS 4, ESS 10
	Grievances	<ul style="list-style-type: none"> <li>Grievances, Complaints, Disruption of Activities and Vandalism</li> </ul>	<ul style="list-style-type: none"> <li>Grievances from community locals as a result of relocation of structures within the ROW</li> <li>Negative impact on host community dynamics as an outcome from labour influx</li> <li>Impact on existing infrastructures which may be accidentally damaged or destroyed during the movement of heavy-duty vehicles and equipment</li> </ul>	Medium high	Considerable	Moderate	ESS 1, ESS 4, ESS 5, ESS 10
	Physical Cultural Resources (PCR)	<ul style="list-style-type: none"> <li>Grievance and Conflicts</li> </ul>	<ul style="list-style-type: none"> <li>Grievances may arise due to activities around sacred sites</li> </ul>	Medium	Considerable	Moderate	ESS 1, ESS 5, ESS 8, ESS 10
	Conflicts of Interest	<ul style="list-style-type: none"> <li>Risk of violent or non-violent conflicts</li> </ul>	<ul style="list-style-type: none"> <li>Conflicts of interests may arise during decision making at the project implementation level; between Contract workers and general labour, etc. .</li> </ul>	Medium	Considerable	Moderate	ESS 1, ESS 2, ESS10
	Illicit Behaviour	<ul style="list-style-type: none"> <li>Risk of Illicit Behaviour and Crime</li> </ul>	<ul style="list-style-type: none"> <li>Theft, physical assaults and substance abuse attributable to labour influx. Additionally, there may be increase in unprotected sexual intercourse due to labour influx thereby increasing the risks of Sexually Transmitted Diseases (STDs) and Sexually Transmitted Infections (STIs).</li> </ul>	Medium	Considerable	Moderate	ESS 1, ESS 4, ESS 10
	Labour Influx	<ul style="list-style-type: none"> <li>Risk of social conflicts</li> <li>Risk of illicit behaviour</li> <li>Security risks and threats</li> </ul>	<p>Labour influx may lead to:</p> <ul style="list-style-type: none"> <li>Risk of social conflicts between local community and the construction workers</li> <li>Risk of illicit behaviour and practices e.g., substance abuse which may also be on the increase following the influx of migrant contractor workers across project locations.</li> <li>Contracted workers such as Contractors may be exposed to security threats such as vandalism and destruction of their assets and possibly kidnapping.</li> </ul>	Medium High	Considerable Extreme	Moderate Major	ESS 1, ESS 2, ESS 10 ESS 1, ESS 2, ESS 10

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	GBV and SEA - attributable to labour influx	<ul style="list-style-type: none"> <li>SEA/SH and VAC (GBV)</li> </ul>	<ul style="list-style-type: none"> <li>Women and girls may be exposed to SH/SEA as a result of interactions with workers and possibly followers.</li> </ul>	Medium	Considerable	Moderate	ESS 1, ESS 2, ESS 4, ESS 10
	VAC - attributable to labour influx	<ul style="list-style-type: none"> <li>Child Safety</li> </ul>	<ul style="list-style-type: none"> <li>Children may be exposed to various forms of violence from workers.</li> </ul>	Medium	Considerable	Minor	ESS 1, ESS 4, ESS 10
	Community Health and Safety	<ul style="list-style-type: none"> <li>Exposure to accidents</li> </ul>	<ul style="list-style-type: none"> <li>Unreclaimed and abandoned borrow pits may pose safety risks for children and other persons in communities.</li> <li>Likely accidents while pedestrians are crossing access roads.</li> </ul>	Medium	Considerable	Moderate	ESS1, ESS 4, ESS 10
		<ul style="list-style-type: none"> <li>Security risks and threats</li> </ul>	<ul style="list-style-type: none"> <li>Communities already exposed to security risks and threats may experience heightened security threats due to ongoing intervention works. E.g., kidnapping. Similarly, communities void of security risks and threats may suffer such when sub-projects commence.</li> </ul>	High	Extreme	Major	ESS1, ESS 4, ESS 10
	Restricted access	Restricted access along project locations	<ul style="list-style-type: none"> <li>Road users may suffer restricted access to selected roads when intervention works are ongoing</li> </ul>	Medium high	Considerable	Moderate	ESS 1, ESS 4, ESS 5, ESS 10
	Displacement	Physical and Economic Displacement	<ul style="list-style-type: none"> <li>Implementation of civil works may result to reclamation of the ROW and impact on livelihoods.</li> </ul>	Medium high	Great	Moderate	ESS 1, ESS 5, ESS 10
<b>Occupational Risks</b>		<b>Occupational Impacts</b>					
Health and Safety at Work	OHS Risks	Most activities could predispose personnel to hazards. "Unsafe behaviours <sup>55</sup> " and "Unsafe conditions <sup>56</sup> " will pose a serious OHS risk.		Medium high	Considerable	Major	ESS 1, ESS 2, ESS 10

<sup>55</sup> **Unsafe Behaviors** – are behaviours that expose workers/visitors in workplace, to hazards and risks. These may include, horseplay; not undergoing training before commencing a hazardous activity; not wearing appropriate PPEs, not reporting worksite incidents or accidents etc.

<sup>56</sup> **Unsafe Conditions** – represent onsite situations or settings that predispose workers, supervisors, PAPs etc. to worksite hazards and risks such as uncovered ditches, naked energized electric wires or cables, exposed rotatory machinery, leaking poisonous liquids, gels etc.

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### 5.2.4 Potential Adverse Environmental and Social Risks and Impacts on Project Completion (Operation Phase)

The potential adverse E&S risks and impacts on project completion (operation phase), Impacts Likelihood, Consequence and Degree of Significance are summarized in Table 16 below. The relationship of the impacts to the relevant ESSs is also provided.

**Table 16: Potential Adverse E&S Risks and Impacts on Project Completion (Operation Phase) and Relationship to Relevant ESSs**

Operation Phase				Likelihood	Consequence	Degree	Relationship with Relevant ESSs
		Environmental Risks	Environmental Impacts				
Negative	Weed	Pot holes and weed overgrowth on rehabilitated roads	Rehabilitated roads may be dilapidated overtime due to no/poor maintenance.	Medium	Little	Minor	ESS 1, ESS 10
	Air	Air pollution	Deterioration of local air quality due to the release of dust and exhaust gases	Medium low	Little	Minor	ESS 1, ESS 3, ESS 10

Operation Phase				Likelihood	Consequence	Degree	Relationship with Relevant ESSs
		Social Risks	Social Impacts				
Negative	Employment	Loss of employment	Workers will be relieved of their duties at the commencement of the operational phase.	Medium	Considerable	Moderate	ESS 1, ESS 2, ESS 10

### 5.2.5 Relationship of Potential Adverse Environmental and Social Risks and Impacts to Relevant ESSs

The relationship of the identified potential adverse E&S risks and impacts to the relevant ESSs are provided below.

**Assessment and Management of Environmental and Social Risks and Impacts (ESS 1):** Sub-projects/intervention works will require site clearing, removal of topsoil from existing roads (in order to form suitable sub-base for substrate materials such as soil, gravel, asphalt, etc), excavation, use of equipment which may run on hydrocarbons, etc. Such impacts would imply that at early stages of project design, and prior to the procurement of Contractors to undertake sub-projects; appropriate assessment and management of potential environmental and social risks and impacts is carried out so as to assure E&S sustainability of sub-projects. This will require that SPIUs prepare E&S assessments that are proportionate to the envisaged E&S risks and impacts.

**Labour and Working Condition (ESS 2):** RAAMP-SU activities will involve engagement of direct workers and contract workers and staff hired by the FPMU and SPIUs, as well as staff of requisite MDAs and primary supply workers. Diverse worker types, e.g., Contractor personnel (skilled and unskilled) will be procured to carry out sub-projects/intervention works. Influx of labour may increase risks of SEA/SH, result in the movement of followers, expose workers to OHS risks and impacts etc. Workers are also likely to suffer delayed payment of wages and a non-redressal of work-related grievances. Contractors will set up workers campsites and equipment staging areas which may also increase social risks such as theft, SEA/SH, spread of STDs/STIs etc (See Chapter 6, section 6.7.4 for siting of workers campsite). These and more establish that the requirements of ESS 2 be covered in any E&S assessment to be prepared under the project, and in addition require that the provisions of the LMP are met throughout all stages of RAAMP-SU implementation

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as a whole. This also extends to sub-projects/intervention works during the pre-construction/pre-rehabilitation, construction/rehabilitation and operation phases.

**Resource Efficiency and Pollution Prevention and Management (ESS 3):** Air, Noise, Soil, Water pollution and minimal carbon emissions are likely to occur during sub-project/intervention works implementation. Therefore, the requirements of ESS 3 need to be met by RAAMP-SU. Furthermore, work implementation will result in waste generation which needs to be managed in an efficient, and environmentally sound manner. Liaisons with SEPAs and SWMAs at state level will be required, both at the level of the SPIUs and at the level of the Supervisory Consultants and Contractors. The project will expect that there is responsible use of energy, water and raw material resources including the adoption and use of alternatives which promotes resource efficiency.

**Community Health and Safety (ESS 4):** General RAAMP-SU implementation and subsequent implementation of sub-projects/intervention works has propensity to result in adverse community health and safety risks and impacts thus necessitating that the requirements of ESS 4 are met by the project. Ongoing intervention work may exacerbate security risks and threats in communities already exposed to security risks and threats. E.g., kidnapping. Similarly, communities void of security risks and threats may suffer such when sub-projects commence. Inefficient design of rural roads may cause obstruction to natural drainages, exacerbate already existing flooding and erosion problems, escalate the spread of communicable diseases e.g., malaria, and may increase exposure of vulnerable groups including elderly persons, people living with physical disabilities, women and children to detrimental community health and safety conditions. This brings to play the need to ensure that the requirements of ESS 4 are met during the assessment and management of E&S risks and impacts. Importantly, the ESMF has captured Climate Impacts and Vulnerability of Project Prospective States and the FCT (See Chapter 4).

**Land Acquisition, Restriction on Land Use and Involuntary Resettlement (ESS 5):** The potential adverse impacts associated with implementation of activities highlighted in Components A and B may involve unavoidable minor impacts on land and livelihoods which will be mitigated through the provisions of ESS5. Economic displacement under the project may involve loss or restricted access to farms, access to structures serving as petty trading shops and Point of Sale (POS) transactions points which may be on the ROW. Generally, impacts relating to physical and economic displacement are addressed in the RPF and shall be addressed for sub-projects/intervention works in the RAPs.

**Biodiversity Conservation and Sustainable Management of Living Natural Resources (ESS 6):** The project will not support rural roads that are likely to pass through forests or requiring forest land diversion; passing through wildlife sanctuaries, national parks, critical/natural habitats, eco-sensitive zones etc. The ESMF includes an annexure (Annex 13) dedicated to **National Protected Areas and World Heritage Sites in Nigeria Relevant for Consideration During RAAMP-SU Implementation**. Although sub-projects are not envisaged to result in major impacts on biodiversity, some adverse minor to moderate biodiversity risks and impacts may occur during clearing of vegetation, excavation of new borrow pits, channeling of disused water and oils into fresh waters (which may disturb lifecycles of fish, amphibians, plankton, and other fresh water life forms), logging of trees/use of forest products and hunting/poaching of small common wild animals. Biodiversity management measures shall be prepared by the FPMU/SPIUs as part of E&S assessments to be prepared; and implemented for sub-projects/intervention works.

**Cultural Heritage (ESS 8):** Adverse potential E&S impacts on cultural heritage may vary across the 36 states and the FCT. More impacts on cultural heritage are envisaged to occur in the south-west, south-south and south-east states under RAAMP-SU where cultural practices and preservation of cultural heritage are largely predominant. Furthermore, civil works may impact on shrines, memorial tombstones, monoliths and other physical cultural resources. Therefore, the requirements of ESS 8 are to be met during project implementation and established in the E&S assessment under ESS 1.

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**Stakeholder Engagement and Information Disclosure (ESS 10):** Project implementation at both the federal and state levels will require thoughtful, coordinated, participatory, continuous, efficient and effective stakeholder engagement throughout RAAMP-SU implementation. In this regard, the project has prepared a SEP to guide its operation throughout the project cycle. No sensitive activity shall be carried out without proper stakeholder analysis which will involve stakeholder identification and mapping across the project Components. In the case of sub-projects/intervention works implementation; early, participatory and continuous stakeholder engagement will play a vital role in avoiding, reducing and minimizing adverse impacts of citizens and PAPs on project implementation (grievances, protests, stop work orders by government etc.). Similarly, stakeholder engagement shall provide insights to opinions of PAPs which may be useful in project design, and in the assessment and management of E&S risks and impacts. The requirements of ESS 10 will ensure proper information disclosure of project related activities and outcomes.

### 5.2.6 Relationship between Sub-Projects/Intervention Works on Environmental and Social Receptors (As Per Relevant ESSs)

As a result of expertise and experience gained in carrying out activities and civil works under the parent project, the proposed sub-projects/intervention works have been expanded to outline further activities which may be carried out in the course of implementation of civil works. The purpose is to show what environmental and social receptors will be affected and established in relationship to the relevant ESSs. Additionally, it is expected that this information shall achieve ESMF implementation by providing guidance for safeguards units/teams of the respective SPIUs in particular, when carrying out their screening exercises. Consequently, this should also inform the preparation of the Terms of Reference (ToR) for future E&S assessments to be undertaken by the states and the FCT (See Chapter 6, Section 6.2.1 on Screening).

**Table 17: Sub-Project/Intervention Works and Potential Sensitivities/Receptors**

S/N	Activities	Environmental Sensitivities and Receptors	Social Sensitivities and Receptors	Relationship to Relevant ESSs
<b>Slope stabilization, erosion protection improvements, surface repairs or resurfacing and other engineering solutions, maintenance of 3,500 km of rural roads, upgrade of about 3,000 km rural roads, etc</b>				
1.	Site clearing	Vegetation and Forests	Farms and economic trees.	ESS 1, ESS 2, ESS 5, ESS 6 & ESS 10
2.	Relocation of structures within the Right of Way (RoW),	Air and Soil	Physical and economic structures such as houses, markets, farms, kiosks, power distribution poles, Physical Cultural Resources (PCR) etc.	ESS 1, ESS 2, ESS 5, ESS 8, & ESS 10
3.	Mobilization of equipment and workers to site	Air and Soil	People living within the project corridors (community members, motorcyclists, farmers, traders)	ESS 1, ESS 2, ESS 3, ESS 4, & ESS 10
4.	Removal of topsoil/dilapidated asphalt from roads	Soil	Road users	ESS 1, ESS 2, ESS 3 & ESS 10
5.	Creation of borrow pits	Soil and Groundwater	Land Owners, People living within and around the project corridors	ESS 1, ESS 2, ESS 3, ESS 4, ESS 5, ESS 6 & ESS 10
6.	Material sourcing	Natural Resources	Nil	ESS 1, & ESS 10
7.	Setting up of workers camp and staging area	Soil and Air	Land Owners/Community	ESS 1, ESS 2, ESS 4, ESS 6 & ESS 10
8.	Earth works	Soil, Air and Surface Water	People living within and around the project corridors (community members, motorcyclists, farmers, traders)	ESS 1, ESS 2, ESS 3, ESS 4, & ESS 10

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S/N	Activities	Environmental Sensitivities and Receptors	Social Sensitivities and Receptors	Relationship to Relevant ESSs
9.	Excavation	Soil, Air and Surface Water	People living within and around the project corridors (community members, motorcyclists, farmers, traders)	ESS 1, ESS 2, ESS 3, ESS 4, ESS 8, & ESS 10
10.	Rehabilitation of drainage structures (culverts etc.)	Surface Water and Soil	Streams/Rivers and Road Users etc.	ESS 1, ESS 2, ESS 4, ESS 6 & ESS 10
11.	Surface Dressing	Air, Soil and Surface Water	People living within and around the project corridors (community members, motorcyclists, farmers, traders)	ESS 1, ESS 2, ESS 3, & ESS 10
12.	Repair of Potholes	Soil	Road Users	ESS 1, ESS 2, ESS 4 & ESS 10
13.	Expansion of road width/carriage way	Soil, Vegetation and Air	Road Users	ESS 1, ESS 2, ESS 5, & ESS 10
<b>Repairing, and strengthening of old bridges and culverts</b>				
1.	Site clearing	Vegetation and Soil	Streams/Rivers and Road Users etc.	ESS 1, ESS 2, ESS 5, ESS 6 & ESS 10
2.	Mobilization of equipment and workers to site	Air and Soil	People living within the project corridors (community members, motorcyclists, farmers, traders)	ESS 1, ESS 2, ESS 3, ESS 4, & ESS 10
3.	Excavation	Soil, Air, Surface Water	People living within and around the project corridors (community members, motorcyclists, farmers, traders)	ESS 1, ESS 2, ESS 3, ESS 4, ESS 8, & ESS 10
4.	Desilting	Surface Water and Soil	Streams/Rivers Users	ESS 1, ESS 2, ESS 3, ESS 4, ESS 6, & ESS 10
5.	Installation of culverts, side drains etc.	Air, Surface Water and Soil	Stream/Rivers and Road Users	ESS 1, ESS 2, ESS 3, ESS 4, ESS 6, & ESS 10

### 5.3 Regional Overview on Gender

In addition to the preparation of this ESMF, a regional overview (North East, North Central, North West, South East, South-South, and South West) on gender impacts, gender capturing, factors hindering gender capture, kind of support initiatives for women to benefit from RAAMP-SU implementation etc. is presented in Table 18 below. The objective is to bring to light some cross-cutting regional gender matters and to direct project design on integrating gender inclusion and strengthening support to women in the course of RAAMP-SU implementation. This should encourage the mainstreaming of project inputs such that RAAMP-SU directly or indirectly enables improvement in women's skills-set, aptitude for business, earning capacity, opportunity for short-term employment within the regions where the RAAMP-SU states operate. etc.



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**Table 18: Regional Overview on Gender Impacts, Gender Capturing, Factors Hindering Gender Capture, Kind of Support Initiatives for Women to Benefit from RAAMP-SU Implementation**

North-East Geopolitical Zone
<p><b>Gender Impacts</b> - Women and girls face greater risks and vulnerabilities due to conflict and displacement. As a result of heightened conflict, women and girls are mostly indoors and this in turn impacts their access to education, healthcare, and economic opportunities.</p> <p><b>Gender Needs</b> – Prioritize safety measures along intervention roads, including well-lit pathways and community policing initiatives, support initiatives that promote women's economic empowerment and access to education, and ensure access to healthcare facilities, including maternal and reproductive health services.</p> <p><b>Gender Capture in Existing RAAMP States</b> – 40% Male to 60% Female</p> <p><b>Gaps Hindering Gender Capture and Female Participation</b> – a) Displacement and insecurity due to conflict and insurgency in RAAMP-SU Prospective States e.g., Adamawa, Borno and Yobe disproportionately affects women's mobility, safety, and access to markets and agricultural resources. B) Limited availability of gender-sensitive infrastructure and services, such as safe transportation routes, market facilities, and childcare support, hinders women's participation in rural markets and economic activities. c) Challenges related to land tenure and property rights, with women facing barriers to land ownership, control, and access for agricultural production and livelihoods.</p> <p><b>Actions to be Taken to Promote Gender Capture</b> – RAAMP-SU should a) conduct outreach programs to raise awareness about women's rights, including access to land, markets, and resources for agricultural production, b) Support the establishment of women-managed savings and loan groups to facilitate access to financial services and investment in agricultural enterprises, c) Implement safety and security measures during sub-projects/intervention works to enhance women's confidence and participation as unskilled workers, vendors, traders, .</p>
North-Central Geopolitical Zone
<p><b>Gender Impacts</b> - Women face challenges accessing economic opportunities and healthcare services due to limited road infrastructure and transportation options.</p> <p><b>Gender Needs</b> – a) Improve Road connectivity to markets and healthcare facilities, b) Promote women's participation in income-generating activities and entrepreneurship, and c) Address cultural barriers that may inhibit women's mobility and access to services.</p> <p><b>Gender Capture in Existing RAAMP States</b> – 75% Male to 25% Female</p> <p><b>Gaps Hindering Gender Capture and Female Participation</b> – a) Limited access to agricultural extension services tailored to the needs of women farmers, such as training in modern farming techniques and market-oriented agriculture. b) Socio-cultural barriers and traditional gender norms that restrict women's participation in decision-making processes related to agricultural development and market management. c) Insufficient infrastructure and support services for women entrepreneurs, including access to credit, markets, and business training, hindering their participation in agricultural value chains.</p> <p><b>Actions to be Taken to Promote Gender Capture</b> – a) Establish women-led agricultural cooperatives and market associations to strengthen collective bargaining power and access to market opportunities. b) Provide training and capacity-building programs for women entrepreneurs on market-oriented agriculture, value addition, and business management. c) Promote women's participation in decision-making bodies related to rural infrastructure planning and management.</p>
North-West Geopolitical Zone

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<p><b>Gender Impacts</b> – Women may face limited mobility due to cultural norms, safety concerns, and distance to essential services</p> <p><b>Gender Needs</b> – Ensure safe and accessible transportation options for women, addressing cultural barriers to women's mobility, and promoting women's participation in decision-making processes related to road rehabilitation activities</p> <p><b>Gender Capture in Existing RAAMP States</b> – 60% Males and 40% Females</p> <p><b>Gaps Hindering Gender Capture and Female Participation</b> – a) Gender disparities in access to education and skills training, limiting women's knowledge and capacity in agricultural production, marketing, and entrepreneurship. b) Socio-economic factors such as poverty and household responsibilities disproportionately burdening women, hindering their ability to engage in income-generating activities and participate in markets. c) Inadequate support for women-led agribusinesses, including access to finance, technology, and market information, restricting their market competitiveness and growth potential.</p> <p><b>Actions to be Taken to Promote Gender Capture</b> – a) Advocate for policy reforms to address discriminatory land tenure systems and ensure women's access to and control over agricultural land. b) Provide technical assistance and training for women farmers on sustainable land management practices, soil conservation, and water harvesting techniques. c) Promote the establishment of women-owned agribusinesses, including food processing and value addition enterprises, to enhance economic opportunities.</p>
<p><b>South-East Geopolitical Zone</b></p>
<p><b>Gender Impacts</b> – Women face limited access to economic opportunities and healthcare services due to inadequate road infrastructure and transportation options.</p> <p><b>Gender Needs</b> – a) Improve Road connectivity to markets and healthcare facilities, b) Support initiatives that promote women's economic empowerment and access to education, and c) Address cultural barriers that may inhibit women's mobility and participation in public life.</p> <p><b>Gender Capture in Existing RAAMP States</b> – 80% Male to 20% Female</p> <p><b>Gaps Hindering Gender Capture and Female Participation</b> – a) Limited access to markets and market information for women farmers and entrepreneurs, constraining their ability to sell agricultural products and access higher-value markets. b) Cultural and social norms that prioritize men's roles in agricultural decision-making and leadership, marginalizing women's participation and contributions in rural development initiatives. c) Inadequate support for women's cooperatives and producer groups, including training, capacity-building, and access to credit, hindering their collective action and market access.</p> <p><b>Actions to be Taken to Promote Gender Capture</b> – a) Facilitate access to agricultural extension services and training programs tailored to the needs of women farmers, focusing on crop diversification, pest management, and organic farming practices. b) Establish market linkages and distribution networks for women producers to access urban markets and export opportunities for their agricultural products. c) Promote the integration of women into farmer cooperatives and producer groups to strengthen their collective voice and market presence.</p>
<p><b>South-South Geopolitical Zone</b></p>
<p><b>Gender Impacts</b> – Depending on the community they live in, women already experience environmental degradation and displacement due to oil exploration and extraction activities, which affects their access to land and livelihoods</p> <p><b>Gender Needs</b> – a) Ensure equitable access to road infrastructure and transportation options for women, b) Address environmental concerns and c) Promote sustainable livelihood opportunities for women in oil-impacted communities</p>

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### Gender Capture in Existing RAAMP States – 75% Male to 25% Female

**Gaps Hindering Gender Capture and Female Participation** – a) Environmental degradation and natural resource depletion affecting women's livelihoods and access to productive resources, and exacerbating gender disparities in rural areas. b) Limited access to technology and infrastructure for women engaged in fisheries and aquaculture activities, constraining their productivity and market competitiveness. c) GBV and discrimination in rural communities, including harassment and exploitation, creating barriers to women's participation in agricultural activities and market transactions.

**Actions to be Taken to Promote Gender Capture** – a) Strengthen women's access to credit and financial services through the establishment of women-focused microfinance institutions or savings and credit cooperatives. b) Support women's participation in fisheries and aquaculture activities through training programs on fish processing, pond management, and value chain development. c) Engage women's groups in community-based natural resource management initiatives, including mangrove restoration and sustainable forest management.

### South West Geopolitical Zone

**Gender Impacts** - Women may encounter SEA/SH (GBV) when utilizing rural roads, which in turn impacts their safety and mobility.

**Gender Needs** – a) Implement safety measures such as well-lit pathways and designated waiting areas, b) Promote women's participation in decision-making processes related to road construction, and c) Address cultural norms that may restrict women's mobility.

### Gender Capture in Existing RAAMP States –

**Gaps Hindering Gender Capture and Female Participation** – a) Inadequate support for women's access to agricultural inputs and resources, including seeds, fertilizers, and equipment, limiting their productivity and competitiveness in agricultural production. b) Challenges related to market access and transportation infrastructure, such as poor road networks and limited access to transportation services, hindering women's ability to access markets and sell their products. c) Limited availability of childcare and family support services, constraining women's mobility and participation in market activities, particularly for women with caregiving responsibilities.

**Actions to be Taken to Promote Gender Capture** – a) Provide technical assistance and support for women-led horticultural enterprises, including greenhouse farming. b) Establish market infrastructure and storage facilities to improve post-harvest handling and reduce post-harvest losses for women farmers. c) Strengthen women's participation in agricultural research and innovation through partnerships with research institutions and extension services.

### RAAMP-SU Support/Pet Interventions to Enable Women Benefit from the Project

The following are some Support/Pet Interventions RAAMP-SU may utilize to enable women benefit from the Project:

- Gender-Sensitive training programs
- Women's empowerment workshops
- Community Sensitization and Awareness
- Capacity Building for Women's Groups
- Partnerships with women's organizations
- Inclusion of Women in Procurement Practices
- Gender Responsive Infrastructure designs

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# CHAPTER 6 – ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCEDURES

## 6.1 General Principle (ESS 1-6; 8 & 10)

In preparation of this ESMF, the RAAMP-SU initiated high level consultation with the Environmental Assessment Department (EA-Dept) of the FMEnv to jointly review and agree on the environmental and social assessment procedures to be adopted and followed for RAAMP-SU civil works implementation in the 36 prospective states and the FCT. The procedures bring into play the country’s system for initiating environmental and social assessments as well as public disclosure, together with the ESF requirements for environmental and social assessments following on the World Bank Environmental and Social Policy for IPF. Importantly, due to the nature of some of the proposed project activities under RAAMP-SU and their potential environmental and social risks and impacts, the project’s environmental and social risks have been categorized as “Moderate Risk” according to the Bank’s risk classification. Furthermore, the ESMF is prepared based on general principles necessary for planning and implementation of the project activities. These general principles also take into consideration the relevant ESSs. It is noteworthy to state that the Nigerian EA requirements (specifically, the Nigeria EIA Procedures and Charges, 2021<sup>57</sup>) are largely materially consistent with the provisions of the Bank’s ESF. The purpose of this Chapter therefore is to provide expert direction to the prospective states in particular, on the approach to conducting environmental and social assessments for potential subprojects/intervention works under the RAAMP-SU. See Table 19 for Relevant ESSs and General Principles on Environmental and Social Procedures.

**Table 19: Relevant ESSs and General Principles on Environmental and Social Procedures**

Relevant ESSs	General Principles
ESS 1 – Assessment and Management of Environmental and Social Risks and Impacts	In consistency with the requirements of the Nigeria EIA Act CAP E12. LFN 2004 and ESS 1, the RAAMP-SU will prepare environmental and social assessments for subprojects/intervention works envisaged to have potential adverse environmental and social risks and impacts. The assessment to be carried out should be proportionate to the potential risks and impacts of the intervention works, and will assess, in an integrated way, all relevant direct, indirect and cumulative environmental and social risks and impacts associated with <b>Component A; Sub-Component A.1 (Rehabilitation/Upgrade of about 3,000 km of rural roads, repairing, and strengthening of old bridges and culverts, slope stabilization, erosion protection improvements, surface repairs or resurfacing and other engineering solutions, and Component B; Sub-Component B.1 (Civil works relating to maintenance of 3,500 km of rural roads)</b> . Importantly, the subprojects/intervention works shall be subjected to a process prior to preparation of the Environmental and Social Assessment. The process will include an initial Environmental Examination (Screening).
ESS 2 – Labour and Working Conditions	Contractors to be engaged in rehabilitation/construction and maintenance works under the project should prepare Contractor’s Environmental and Social Management Plans (CESMPs), sign Code of Conduct (CoC) to reduce the risks of SEA/SH, comply to E&S provisions in their bidding/contract documents, set up campsites taking into consideration recommendations captured in Section 6.7.4, provide their workers with First Aid Kits and Occupational Health and Safety Management Plans (OHSMPs). There should also be proper provisions for workers’ wages, workers GRM and “No Room” for child labour.
ESS 3 – Resource Efficiency and Pollution Prevention and Management	Sub-projects/intervention works as much as possible should limit the exploitation of raw materials from forests e.g. wood. Water used for rural road upgrades and other civil works should be reused where possible. Additionally, the design of drainages should take into consideration the Green Roads for Water Approach. SPIUs should facilitate meetings between Contractors and the SEPAs/SWMAs for the smooth running of waste management activities during project implementation. Vehicles and machinery should also be retrofitted with sound-proof materials/devices.
ESS 4 – Community Health and Safety	SPIUs shall establish a strong relationship with Community Based Organizations (CBOs) and State Emergency Management Agencies (SEMAs) for the purpose of proactive planning and response in the event of emergencies. Contractors involved in rural roads rehabilitation works shall install safety signages, barricades and ensure other safety measures prior to and during civil works. Borrow pits should be properly guarded (See Section 6.7.9). Streams/rivers/ponds used by communities for domestic activities should not be contaminated by sediment laden run-off from civil works. Importantly, the project shall conduct a Security Risk Assessment (SRA) and implement a Security Management Plan (SMP).

<sup>57</sup> <https://ead.gov.ng/wp-content/uploads/2023/02/2021-EIA-Procedures-and-Charges.pdf>

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Relevant ESSs	General Principles
ESS 5 – Land Acquisition, Restriction on Land Use and Involuntary Resettlement	<p>The project will refrain from approving sub-projects/intervention works which will result in significant and major acquisition of land, physical and economic displacement and explore all viable alternative project designs. For sub-project activities which will require reclamation of the ROW of rural roads which may result in minor to moderate physical and economic displacement, SPIUs shall comply with the provisions of the RPF in their process of assessing proposed sub-projects for the purpose of preparing Resettlement Action Plans (RAPs). Furthermore, PAPs are required to be meaningfully consulted and participate in the resettlement process, this is further elaborated in ESS 10: Stakeholder Engagement and Information Disclosure which is mandatory for all development projects supported by the Bank. SPIUs should ensure that compensation is carried out before construction or displacement. In addition, ESS 5 recognizes that the Borrower will establish a cut-off date for eligibility (this applies to all SPIUs in the process of preparation of their RAPs). In addition to compensation, SPIUs shall implement livelihood restoration and improvement programs for vulnerable PAPs.</p>
ESS 6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources	<p>The project at large and SPIUs in particular shall avoid selecting rural roads which cut across/traverse protected areas, natural reserves, national parks etc. importantly, the following should be considered when selecting roads in order to avoid habitat fragmentation and other impacts on biodiversity.</p> <ul style="list-style-type: none"> <li>• <b>Consultations with MDAs and Local Authorities:</b> The FPMU/SPIUs and Consultants shall consult relevant MDAs such as FMEnv (Department of Forestry) or relevant/similar state MDAs, to understand the specific regulations and guidelines pertaining to road development near protected areas in at the federal and state levels. These regulations may specify minimum setback distances or other requirements.</li> <li>• <b>Environmental and Social Assessment of Biodiversity Risks and Impacts:</b> This will be part of the general E&amp;S assessment capture in ESS 1.</li> <li>• <b>Buffer Zones:</b> The project shall establish its own buffer zones between the rural roads and protected areas to reduce negative impacts. The width of these buffer zones may vary depending on factors such as the sensitivity of the ecosystem, the scale of the rural road project, and local regulations. Buffer zones can help prevent habitat fragmentation, soil erosion, and wildlife disturbance.</li> <li>• <b>Stakeholder Consultation:</b> SPIUs shall engage with local communities, environmental CBOs/NGOs, and relevant stakeholders to gather input and ensure that concerns and interests of those living near protected areas are considered during design of sub-projects/intervention works.</li> <li>• <b>Adopt Best Practices:</b> Implement best practices for sustainable rural road rehabilitation/construction and maintenance to minimize environmental damage. This may include techniques for erosion control, wildlife crossings, and vegetation preservation where required.</li> <li>• <b>Adherence to International Standards:</b> The project shall consider international standards and guidelines for road development (in particular rural roads) near protected areas, such as those outlined by the International Union for Conservation of Nature (IUCN) and the Bank's Guidance Note on ESS 6.</li> <li>• <b>Case-Specific Considerations:</b> Importantly, the FPMU/SPIUs should recognize that the appropriate distance from protected areas may vary depending on the specific characteristics of the site and the unique ecological context. Factors such as the presence of endangered species, important habitats, or critical ecological corridors may necessitate greater setbacks.</li> </ul>
ESS 8 – Cultural Heritage	<p>All 36 states and the FCT present different forms of cultural heritage with more diversity on cultural heritage practices, traditions, beliefs and African Traditional Religion (ATR) in the southern regions of the country. SPIUs shall take this into note during the design of their sub-projects/intervention works such that they protect cultural heritage from the adverse impacts of project activities and support its preservation. Project designs should avoid impacts on shrines, places of cultural significance in communities, unfenced cemeteries/burial grounds etc. An extensive stakeholder engagement is required to assure project activities are in keeping with the requirements for ESS 8</p>
ESS 10 – Stakeholder Engagement and Information Disclosure	<p>In line with the requirements of ESS 10, SPIUs will undertake regular and continuous engagement with the stakeholder groups as per implementation of their sub-projects and intervention works. This will involve engaging, consulting and liaising with communities and stakeholders during sub-project implementation. Information disclosure will be geared around the planning and preparatory stages of the sub-project to ensure sustainability of the sub-project design through the capture and inclusion of PAPs opinions (where necessary), in order to achieve outcomes consistent with ESS 10. SPIUs of the RAAMP-SU Prospective States will build upon the channels of communication and engagement already established with stakeholders by virtue of this ESMF (Chapter 9). Future consultations will adhere to the principles of Free, Prior and Informed Consent (FPIC), ensuring an accessible and unrestricted engagement process accompanied by timely disclosure of relevant and understandable information. SPIUs will also embark on a disclosure process through the FMEnv for In-Country disclosure of the E&amp;S assessment, while the Bank shall disclose the E&amp;S assessment on its external website.</p>

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### 6.2 Environmental and Social Assessment and Management Process (ESS 1)

Similar to ESS 1, the EA-Dept of the FMEEnv mandates that a review of all proposed investment projects or sub-projects be undertaken through a process called an Initial Environmental Examination - IEE (Screening). The purpose of the screening is to categorize projects or sub-projects based on propensity/likelihood to result in potential adverse environmental and social risks and impacts. This will require sorting out proposals which appear to be highly detrimental to the environment and human health, and determining the appropriate extent and type of Environmental and Social Assessment to be prepared. The Bank supports the use of the Borrower's E&S Framework in the assessment, development and implementation of projects supported through Investment Project Financing, provided this is likely to address the risks and impacts of the project, and enable the project to achieve objectives materially consistent with the ESSs.

#### 6.2.1 Screening

The first step in the screening process is the determination of the environmental and social aspects of subprojects/intervention works under the RAAMP-SU; so as to ascertain the type of environmental and social assessment required (if any) in accordance with the Nigeria EIA Procedures and Charges (2021), ESS 1 and in consistence with the ESSs. Each subproject/intervention works i.e., Component A; Sub-Component A.1 (Rehabilitation of 3000 km of rural roads to and from socio-economic community infrastructure to include climate resilience and flood protection measures, such as repairing, and strengthening of old bridges and culverts, slope stabilization, erosion protection improvements, surface repairs or resurfacing and other engineering solutions and Component B; Sub-Component B.1 (Civil works relating to maintenance of 3,500 km of rural roads established by RARA) shall be appraised through screening. This will be undertaken primarily by the RAAMP-SU SPIUs for sub-projects listed by the states and proposed for intervention. The RAAMP-SU FPMU will provide advisory and oversight where and when required. The objectives of screening are to (i) *screen the environmental and social risks and impacts of a subproject; and (ii) determine the type(s) of E&S assessment, mitigation measures, specific plan(s) or safeguard instrument(s) to be prepared based on the outcomes of the screening.* The screening process should also be used to identify eligible or ineligible subprojects/intervention works<sup>58</sup> for further or no environmental and social assessment, respectively. Practically, safeguards teams in the SPIUs may carry out the screening process by analyzing the proposed intervention works for Components A and B in relation to their environmental & social context (area of influence) using a checklist approach. An Environmental and Social Screening Checklist is provided in Annex 2 and may be modified for use by the respective RAAMP-SU SPIUs. Cumulative impacts will also be incorporated into the Screening process, particularly in project areas with multiple/concurrent projects or ongoing development activities. In such cases, the Screening process shall assess the combined effects of projects to understand their collective environmental and social implications. From a general project conceptualization perspective, the RAAMP-SU has been classified as “**Moderate Risk**” for environmental and risks and impacts. However, the Bank will review the risk classification assigned to the project on a regular basis, including during implementation, and will change the classification where necessary, to ensure that it continues to be appropriate. Any change to the classification will be disclosed on the Bank's website.

Screening will provide an early opportunity for the SPIUs, SMEnvs, RAAMP-SU FPMU and the Bank, to define the nature and extent of information required to make an informed decision about the project through evaluating and ascertaining the amount of information and analysis needed in the E&S assessment. It should ensure that the E&S assessment focuses on the most significant environmental and social risks and impacts of the proposed sub-projects/intervention works; taking into cognisance the requirements of ESSs 1 – 6, 8 and 10 which are relevant to RAAMP-SU. These significant environmental and social risks and impacts/areas of concern shall be captured in the Terms of Reference (ToR) for the E&S Assessment for the proposed intervention work(s). The ToR shall be prepared by the SPIUs and reviewed by the RAAMP-SU FPMU & the Bank. This ToR shall be included in the Request for Proposals (RFPs) for consultancy assignments to undertake E&S assessments in RAAMP-SU Prospective States and the FCT. Furthermore, the ToR shall also be included in the Contract Agreement for E&S

<sup>58</sup> **Ineligible sub-projects/intervention works** – Sub-projects screened and identified to have no significant environmental and social risks and impacts can move straight to implementation in accordance with pre-approved standards, guidelines or codes of practices for environmental and social management.



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assessments. The SPIU shall register the E&S Assessment with the FMEEnv to comply with national procedures for eventual disclosure.

### Guidance on E&S Reporting Obligations Post Screening

The RAAMP-SU FPMU, in consultation with the Bank, will advise and guide RAAMP-SU SPIUs on procedures to identify and use appropriate methods and tools, (screening, environmental and social analysis, investigations, surveys, studies, stakeholder engagement with PAPs and Interested Parties, etc.), to identify and assess the potential environmental and social risks and impacts of their proposed subprojects/intervention works. Guidance will include the review of proposed intervention works in terms of their design, area of influence, nature of envisaged environmental and social risks and impacts/concerns/receptors/sensitivities. Ultimately, the outputs of the screening processes should result in the preparation of an i) **“E&S Screening Report”** and ii) **ToR for the E&S Assessment** by the respective RAAMP-SU SPIUs (See Annex 3 and 8 for Sample TORs for ESIA and ESMP). These deliverables shall be submitted to the RAAMP-SU FPMU for review and forwarding to the Bank for final clearance.

**Note:** Principally, the E&S screening will occur during the project preparation stage as a soon as the fairly accurate site location(s) is/(are) known for the sub-project(s). The screening process will inform decision makers and the project management of the true nature and extent of potential environmental and social risks and impacts of proposed sub-projects/intervention works. The schematic diagram in Figure 14 provides guidance on how the screening process may be approached in line with FMEEnv expectations from RAAMP and the requirements of the ESF.

#### 6.2.1.1 Factors to Consider During E&S Screening of Subprojects

The following factors (though not limited) should be considered during E&S screening of sub-projects and shall form a standardized criteria in guiding the process.

##### Site Location

- Where is the sub-project located?
- Is it in a densely populated area?
- What is the length of rural road to be rehabilitated?
- Does the project improve access to markets, schools, health care centres and other social amenities?
- What is the topography like?
- Are there ongoing projects in the area and are they likely to contribute to cumulative impacts?
- Are there existing borrow pits or are there areas suitable for siting borrow pits? etc

##### Watershed

- Will the project design affect the natural flow of water and hydrology?
- Is the project located near sensitive water resources and will it increase sedimentation?
- Topography and Slope: Assess the terrain to determine suitable road alignments, avoid steep slopes, rehabilitation in such areas can lead to increased erosion, landslides, and sedimentation in water bodies
- Will the drainage design capture and treat runoff before it enters water bodies?
- Does the design allow for channelling of water runoff into appropriate natural water courses?
- Does the design incorporate the Green Roads for Water Approach? etc

##### Waste Generation

- Waste types that might be generated and the waste streams
- Estimate quantity of each waste type
- Significant impact on communities
- Are options available for treatment and final disposal of waste that will be generated during implementation of the sub-project? etc.

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### Social Perception and Input

- Nature of perception of communities and PAPs on the project
- Extent of stakeholder analysis (identification and mapping) and engagement required
- Is Social License to Operate (SLO) required from communities and in what nature? etc.

### Gender, Social Inclusion and Vulnerable Groups

- Nature of gender capture under the sub-project
- Extent to which the project incorporated gender inclusion
- Is project design going to contribute to adverse impacts on vulnerable groups (elderly persons, women and children and people living with disabilities) etc.

### Sub-project Sustainability and Resilience (to force, load physical impact, natural disasters/climate impacts e.g., flooding, erosion)

- Check to see if project designs are climate resilient (to flooding, erosion)
- Check to see if type of intervention reduces pre-existing adverse climate impacts such as flooding and erosion. Additionally, check to see if the type of rehabilitation (upgrading and maintenance) will resolve the current pre-existing E&S issues (cumulative impacts) etc.

### Protected Areas and Biodiversity

- Is the project design such that it will adversely impact protected areas, forest reserves, animal conservation sites, etc.
- Assess the impact of sub-project activities on local biodiversity including those within the vicinity of the proposed sub-projects (selected roads)

### Labour Requirements and Potential for Increasing Risks of SEA/SH

- Number of personnel that will be required for the sub-projects (skilled and unskilled)
- Length of time required for each phase of the sub-project (pre-rehabilitation/pre-construction, rehabilitation/construction and operation phases)
- Equipment, materials and equipment requirements, location for campsites and equipment staging areas
- Type of capacity building for Contractors and Supervisory Consultants etc.

### Physical and Economic Displacement

- Magnitude and scale of physical and economic displacement due to the sub-project
- Extent to which there will be loss of land or assets on land such as farms, structures (moveable or immovable)
- Estimated cost of compensation
- Nature of livelihood restoration programs required

### Physical Cultural Resources (PCR)

- Type of PCRs/cultural heritages within or on the corridors of the sub-project
- Scale of adverse impacts on cultural heritage
- Cost of replacement/compensation for damage to cultural structures (shrines, etc)

### Cost of Implementation

- Cost for implementing the sub-projects/intervention works
- Cost benefit analysis for undertaking the proposed work
- Estimated implementation costs for mitigation measures and monitoring
- Cost for training on implementation of mitigation measures and monitoring etc.

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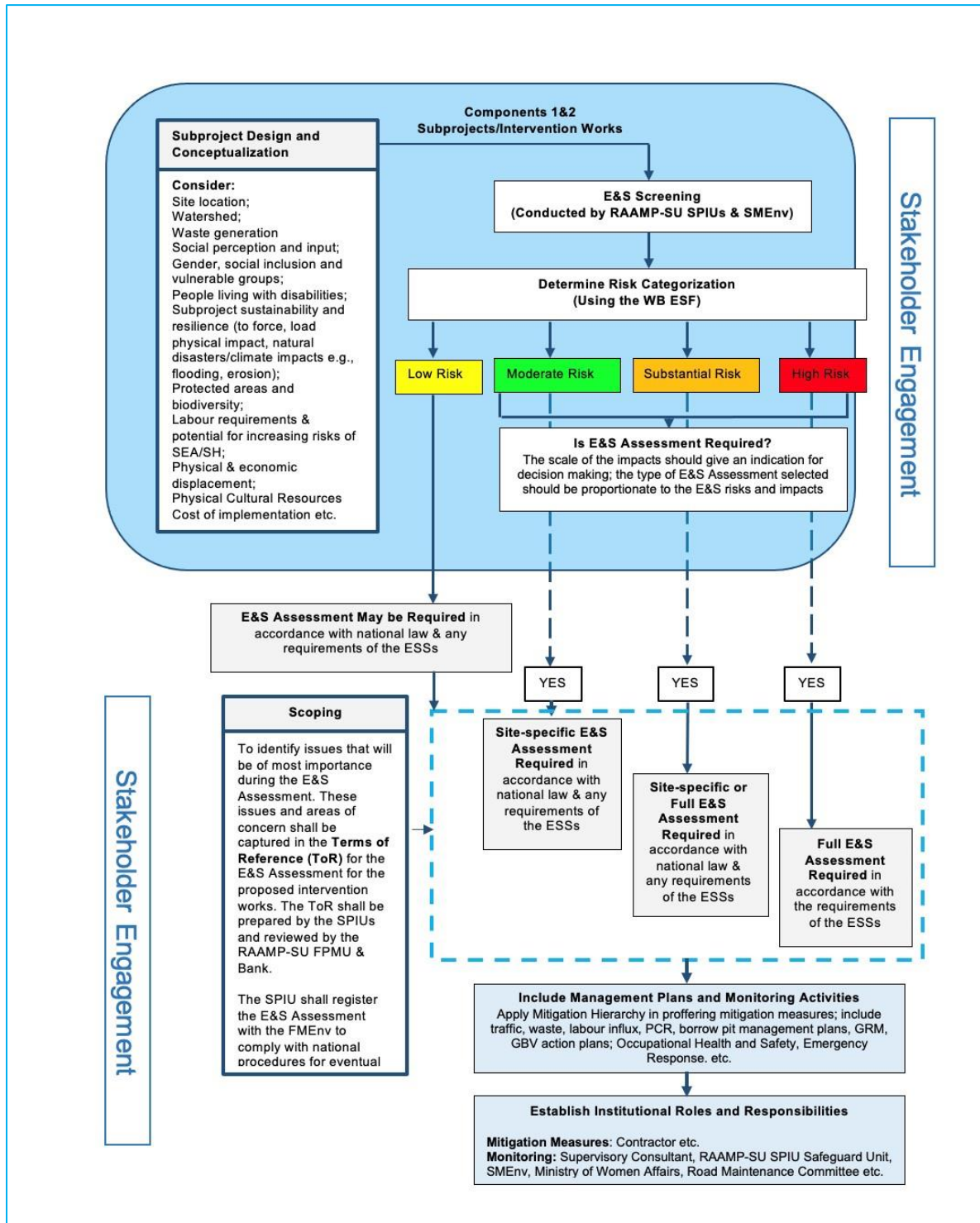


Figure 14: Guidance for E&S Screening for RAAMP-SU Implementation (Schematic)

When conducting the E&S screening, Safeguards Units of the RAAMP-SU SPIUs should be thorough in identifying environmental sensitivities such as air, surface water, ground water etc. which could be impacted beyond permissible limits during project implementation. Table 20 below, in line with the schematic in Figure 14 elaborates on some impactable sensitivities and their corresponding impact indicators. The information provided offers guidance and should be expanded upon depending on the type of intervention work to be carried out, the location, and environmental and social sensitivities within the corridors of the sub-projects/intervention works.

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**Table 20: Impactable sensitivities/components and associated impact indicators**

S/N	Impactable sensitivities/components of the Environment	Impact Indicators
1.	Climate	Humidity, temperature, rainfall, wind speed and direction
2.	Air	Particulates, NOx, SOx, CO, H <sub>2</sub> S
3.	Surface Water	Dissolved/suspended Solids, Nutrients, Heavy metals and pH.
4.	Hydrology	Drainage/Discharge, Hydrologic Balance, Sedimentation, Flooding.
5.	Soil/Land	Erosion, Soil fertility/Crop yield, Hunting, Recreation.
6.	Biodiversity	Diversity and abundance of terrestrial flora & fauna, habitats quality, Habitat fragmentation, accessibility to conservation areas, loss of economic trees, forests, forced migration of species, endangered species.
7.	Physical Cultural Resources (PCR)	Cultural relics, Cultural Sites, Shrines, Memorial Tomb Stones
8.	Noise & Vibration	Daytime disturbance, Hearing loss, Communication Interference, Night time disturbance.
9.	Socio-Economics	Population, Social Structure, Gender, Age distribution, Religion, Demography, Administration, Occupation and Livelihood, SEA/SH, Labour Influx Income, Settlement Patterns, Employment, Agriculture, Health, Safety and Security, Economic and physical displacement, grievances, traffic

Additionally, safeguards units of the respective RAAMP-SU SPIUs may approach the screening process by looking at the proposed sub-projects/intervention works from a phased approach. This will create a clearer picture in light of a) the project phase, b) the type of civil works being carried out in that phase of the project and c) the possible sources of risks and impacts from more defined activities to be undertaken in implementing the sub-projects/intervention works. See Table 21.

**Table 21: Phases of Subprojects/Intervention Work Implementation and Possible Sources of Risks and Impact**

S/N	Project Phase	Sub-projects/Intervention works	Possible Sources of Risks and Impact
1.	Pre-rehabilitation/Pre-construction	<ul style="list-style-type: none"> <li>Upgrade of about 3,000 km of rural roads</li> <li>Repairing, and strengthening of old bridges and culverts</li> <li>Slope stabilization</li> <li>Erosion protection improvements</li> <li>Surface repairs or resurfacing and other engineering solutions</li> </ul>	<ul style="list-style-type: none"> <li>Site clearing</li> <li>Relocation of structures within the Right of Way (RoW),</li> <li>Mobilization of equipment and workers to site</li> <li>Removal of topsoil</li> <li>Creation of borrow pits</li> <li>Material sourcing</li> <li>Setting up of workers camp and staging area</li> </ul>
2.	Rehabilitation/Construction	<ul style="list-style-type: none"> <li>Maintenance of 3,500 km of rural roads</li> </ul>	<ul style="list-style-type: none"> <li>Earth works</li> <li>Excavation</li> <li>Rehabilitation of drainage structures (culverts etc.)</li> <li>Desilting</li> <li>Surface Dressing</li> <li>Repair of Potholes</li> <li>Expansion of road width/carriage way</li> <li>Labour Influx which could increase risks of SEA/SH/GBV/Violence Against Children (VAC)</li> </ul>
3.	Operation/Maintenance	Road maintenance	<ul style="list-style-type: none"> <li>Disengagement of the Contractors and demobilization from sites.</li> <li>Use of rehabilitated structures (Rural roads, culverts etc.)</li> </ul>
4.	Decommissioning and abandonment		Removal/dismantling of equipment and structures, waste disposal, residual contamination, Road traffic, scrap materials

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### 6.3 Environmental and Social Assessment

The RAAMP-SU FPMU, particularly through its National Project Coordinator (NPC), Infrastructure Engineer (IE) and other requisite team members, in synergy with the RAAMP-SU Task Team Leader (TTL) from the Bank, will agree on the work packages to be implemented by each of the RAAMP-SU Prospective States and the FCT i.e.;

- Upgrade of about 3,000 km of rural roads
- Repairing, and strengthening of old bridges and culverts - locations, number of cross drainages, length and width, materials, etc.
- Slope stabilization
- Erosion protection improvements
- Surface repairs or resurfacing and other engineering solutions - length of roads, type of surface dressing etc.
- Maintenance of 3,500 km of rural roads – number of roads to be maintained, locations, length of roads, etc.

Prior to the above, the RAAMP-SU SPIUs should have submitted the E&S screening report for selected roads and submitted a listing of selected roads which have been screened for E&S assessments. It is this listing that will enable the structuring of sub-projects/intervention works into work packages. The final clearance and approval of the ToRs for the E&S assessments for the proposed roads will provide the basis for consultancy services to be procured, for the preparation of the E&S assessment instruments. Essentially, the E&S assessment might be prepared for a single work package or for all work packages collectively. Statutorily, for the parent project, the approval to conduct the E&S assessment is given by the Bank. This will also apply for RAAMP-SU.

#### 6.3.1 Environmental and Social Assessment Applicability to RAAMP-SU Subprojects/ Intervention Works

The E&S assessment for eligible subprojects/intervention works shall be conducted in accordance with ESS1, and will consider, in an integrated way, all relevant direct, indirect, and cumulative environmental and social risks and impacts of sub-projects/intervention works, including those specifically identified in ESSs 1-6; 8 & 10. The breadth, depth, and type of analysis undertaken as part of the E&S assessment will depend on the nature and scale of the subprojects/intervention works, and the potential environmental and social risks and impacts that could result in the locations within the states where they are implemented. The RAAMP-SU SPIUs will undertake the E&S assessment at the scale and level of detail, appropriate to the potential risks and impacts following the results of the screening process, which will be prepared by qualified consultants in line with the TOR for the assessment. These methods, tools and instruments should reflect the nature and scale of the sub-project(s)/intervention works. Following on the risk classification of the E&S risks and impacts as Moderate risk for RAAMP-SU, the most appropriate safeguards instrument for assessing E&S risks and impacts shall be one which identifies and manages site-specific E&S risks and impacts. This will mean that an Environmental and Social Management Plan (ESMP) may be the most appropriate instrument. However, if the rating of the environmental and social risks was to change to a higher risk rating, E&S risks and impacts associated with sub-projects/intervention works may be assessed by preparing an Environmental and Social Impact Assessment (ESIA). Therefore, both instruments are discussed subsequently.

The environmental and social risks and impacts considered under the RAAMP-SU have been rated as Moderate risk following the risks classification conducted for RAAMP-SU. Considering that the provisions of the ESF allow for flexibility and change adaptation to the Risk Classification of programs/projects/sub-projects, the decision making on the most appropriate E&S instrument should be proportionate to the nature, scale and magnitude of the potential risks and impacts. Furthermore, certain aspects may influence the choice of the E&S assessment to be applied. Some of these may include number of roads selected for surface repairs and other civil works; nature and magnitude of project impacts on communities/livelihoods; types of materials and kind of wastes that might be generated during project implementation; energy use, raw materials and carbon emissions, etc.; proximity of project location to protected areas, forest reserves, heritage sites etc.; magnitude of security risks in project locations; states where subprojects are located in riparian zones or areas; restriction on land use and involuntary resettlement;



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Labour influx<sup>59</sup>. Importantly, safeguard units/teams of SPIUs should strongly consider these including cumulative impacts (particularly in areas with multiple/concurrent projects or ongoing development activities) when undertaking screening of sub-projects/ intervention works so that the appropriate E&S assessment is selected to address E&S risks and impacts.

**Environmental and Social Management Plan (ESMP)** – Based on screening and scoping outcomes, the ESMP will be prepared as a stand-alone document when the scoping report suggests that impacts will be site specific, manageable and of moderate/substantial risk (the activities will involve limited adverse social or environmental impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures). For site-specific sub-projects and likewise, site-specific environmental and social risks and impacts; the most suitable instrument may be an ESMP. The ESMP will identify the environmental and social impacts of the proposed activities and define the roles and responsibilities of all critical stakeholders throughout the life cycle of sub-project activities in order to ensure that mitigation measures including cost estimates are implemented and overall sustainability is assured. Importantly, the mitigation measures for which the Contractor is responsible, must be included in the bidding documents.

**Environmental and Social Impact Assessment (ESIA)** – The Environmental and Social Impact Assessment (ESIA) is an instrument used to identify and assess the potential environmental and social risks and impacts of a proposed project, evaluate alternatives, and design appropriate mitigation, management, and monitoring measures. ESIA's are best suited when the proposed E&S risks and impacts are widespread, of large magnitude, indirect, irreversible, large scale, major, of substantial/high risk and may be of severe consequence. The ESIA will aim to assess the potential E&S impacts that could occur as a result of the implementation of proposed sub-project activities in the 36 RAAMP-SU Prospective States and the FCT. It will also proffer mitigation measures at the pre-rehabilitation/pre-construction, rehabilitation/construction and operation phases of intervention works as well as define roles and responsibilities of all critical stakeholders throughout the sub-project life cycle. Through a dedicated ESMP section as part of the ESIA report, the ESIA will ensure that the proffered mitigation measures are adequate, effective and are implemented in such a way that overall sustainability of the project is assured. Furthermore, it will detail enhancement measures for positive impacts which the SPIUs and their Contractors shall commit to, so as to ensure environmentally safe and socially accountable implementation of their sub-projects/intervention works. This should foster desired outcomes, identify performance indicators, assure effective monitoring and timing for actions and responsibilities. (See section titled: **Important Note**)

### **Important Note:**

The RAAMP-SU may approach the preparation of the E&S assessment from the perspectives enumerated below:

1. Considering that the intervention works may be arranged in Lots and grouped under the various work packages (upgrade of about 3,000 km of rural roads, repairing, and strengthening of old bridges and culverts, slope stabilization, erosion protection improvements, surface repairs or resurfacing and other engineering solutions, maintenance of 3,500 km of rural roads, etc.), the E&S assessment may be approached by preparing one ESMP per state for the consolidated work package (comprising of all intervention typologies) This will help manage the number of E&S instruments to be prepared under the project.
2. An E&S assessment may be prepared for a combination of two or more work packages.

However, certain factors may influence the approach to be adopted for the E&S assessment especially when multiple sites cut-crossing the proposed work packages are concerned. Issues of budgeting and cost effectiveness may strongly influence the approach.

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<sup>59</sup> Labour influx can indeed be a basis for preparing an ESIA for rural road projects. Labour influx can have significant environmental and social implications, such as increased pressure on local resources, changes in land use patterns, impacts on community dynamics, and potential conflicts over resources. An ESIA would help assess these potential impacts comprehensively and identify appropriate mitigation measures to address them. However, depending on the scale and nature of the project, an ESMP may also be necessary to ensure that specific impacts related to labor influx are adequately managed during project implementation.



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**Note:** The discretion and decision making to what option or options are most practicable economically, technically and otherwise; will lie eventually with the RAAMP-SU FPMU, SPIUs and the Bank. Principally, if the risk rating of a sub-project/intervention works increases to a higher risk rating, the RAAMP-SU will apply the relevant requirements of the ESSs and the Environmental and Social Commitment Plan (ESCP) prepared by the Government of Nigeria prior to the RAAMP-SU start-up, which will be updated as appropriate. (The requirements of the ESSs' will relate to the reasons for which the risk rating has increased).

### 6.4 Specific Activities and Responsibilities in the Environmental and Social Assessment process

#### Submission of Proposals and Clearance of E&S Documentation

The respective RAAMP-SU SPIUs will submit their a) **E&S Screening Checklists**, b) **E&S Screening Reports** and c) **TORs for the E&S Assessments** to the FPMU for prior review and initial comments. The FPMU following receipt of the of the documents will review and make inputs and shall proceed with forwarding to the Bank; which will review the documents and clear sub-projects/intervention works for E&S assessment.

The approval process is to ensure that sub-projects/intervention works in the state(s), meet environmental and social requirements of ESS 1 and those of the other relevant ESSs; including guidelines provided in this ESMF Report. If, however the sub-project proposal unsatisfactorily addresses these issues it will be returned to the RAAMP-SU SPIU(s) and FPMU for re-design and re-screening and then must be re-submitted to the Bank for re-review. The revised design will be reviewed once more by the FPMU, and if acceptable, will be forwarded to the Bank for final review and approval. Any proposed sub-project(s) that does not comply with the requirements of the national, state and local Environmental and Social Laws guiding this project, and the requirements of the World Bank Group ESF (ESSs, EHSs, GPNs) specifically, may/will not be cleared.

#### Approval for Funding Sub-Projects/Intervention Works.

Approval for funding sub-projects/intervention works will be referred to the SPIU responsible for undertaking the civil works. However, clearance to commence civil works provided they have satisfied all E&S conditions in this ESMF shall be given by the Bank through the FPMU.

#### Costs of Preparing E&S Assessment

The SPIU shall prepare their budget for carrying out E&S assessment which will be included in their workplan. The workplan will be submitted to the Bank, which shall provide the necessary clearance. Similarly, the approval to commence civil works following final clearance of the E&S assessment and disclosure shall be given by the Bank.

### 6.5 Environment and Social Management Plan (ESMP)

This section presents the outline for the Environmental and Social Management Plan (ESMP) of the RAAMP-SU. A more detailed version of the ESMP shall be included in the stand-alone ESMP instrument and if required, in the ESIA for proposed sub-projects/intervention works.

#### 6.5.1 Scope and Objectives of ESMP

The basic objective of the ESMP is to manage E&S risks and impacts of project interventions in a way that minimizes the adverse E&S risks and impacts associated with sub-projects/intervention works. The specific objectives of the ESMP are to:

- Identify suitable, cost effective and practicable mitigation measures for identified adverse E&S risks and impacts of project interventions during implementation.
- Enhance, maximize and sustain potential project benefits and control negative impacts;
- Establish responsible parties from RAAMP-SU (FPMU and SPIUs), Supervisory Consultants, Contractors, Consultants, and other requisite institutions for the E&S management of the RAAMP-SU and its sub-projects/intervention works.
- Define a monitoring program and identify monitoring parameters (parameters to be measured, method of measurement, performance indicators, etc.)

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Importantly, the ESMP will be managed through a series of tasks/activities and site-specific management plans which will span across the pre-rehabilitation/pre-construction, rehabilitation/construction and operation phases.

### 6.5.2 Inclusion of Relevant Components of ESMP/ESIA in Contract Documents

The E&S assessment (ESMP/ESIA) shall include a dedicated section on essential environmental and social clauses to be incorporated in the contract document. These clauses are aimed at ensuring that the Contractors' carry out their mitigation responsibilities for implementing the ESMP (contained in the stand-alone ESMP instruments or ESIA instruments) as well as other environmental, social and safety measures (OHS and CHS). Such clauses may specify, for example, penalties for non-compliance as well as incentives to promote compliance. The various Contractors shall be made to be accountable to implement the plans and mitigation measures which pertain to them. It is principally the responsibilities of the safeguard units of the SPIUs and the E&S focal persons of the Supervisory Consultant to monitor and ensure such compliance respectively. The contract documents shall also include a listing of mitigation plans necessary to be prepared by the Contractors, broadly, these shall include plans for:

1. Traffic management
2. Waste management
3. Journey Management
4. Community Health and Safety (CHS)
5. Labour and working conditions - Occupational Health and Safety (OHS), Grievance redress, Code of Conduct (CoC) - SH, SEA, VAC etc.
6. Resource efficiency, pollution control and management
7. Physical and Cultural Resources (PCR) and Chance Find Procedures
8. Borrow pit acquisition, excavation, reclamation and management.
9. Climate resilience/ Actions for management of roads in floodplains or prone to flooding etc.

### 6.5.3 Payment Milestones

Payments to contractors would be linked to environmental performance, measured by completion of the prescribed environmental and social mitigation measures (The final acceptance of the completed works should not occur until the environmental and social clauses have been satisfactorily implemented). It is expected that there is synergy between the Contractor and other responsible parties such that a harmony in the implementation of mitigation measures and monitoring is achieved. The project shall include a milestone for payments for Contractors. A defect liability period of one year shall also be included in the contract agreement. Final milestone payment will be received after the different liability period of sub-projects/intervention works.

### 6.5.4 Guidelines to Incorporate Environmental Management in Bid Documents

The SPIUs through their procurement specialists will be solely responsible for incorporating environmental management requirements in the bidding documents and the different operational manuals of the project activities, with the assistance of the environmental consultants or inhouse responsible staff. The generic guidelines to incorporate environmental and social aspects for this purpose are listed below. These are examples only and shall be further elaborated and expanded upon based on the findings and recommendations of the site-specific ESMPs and/or ESIAAs.

- Prepare cost estimates, to be incorporated in the bidding documents.
- Contractors to submit CESMP which should include Management Strategies and Implementation Plans (MSIPs) to address the issues listed in section 6.5.2 above, and as will be identified in the E&S assessments to be conducted.

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### 6.5.5 Management Strategies and Implementation Plans (MSIPs)

These are generic, non-site-specific guidelines. The MSIPs consist of environmental management guidelines and practices to be followed by the contractors/implementation organizations for sustainable management of all environmental issues. The contractor will be required to follow them and also use them to prepare site-specific management plans.

- Occupational Health and Safety Plan
- Campsite Management Plan
- Waste Management Plan
- Borrow Pit Management and Reclamation Plan
- Community Health and Safety Plan
- Road Safety and Traffic Management Plan
- Physical Cultural Resources Management Plan
- Labour Influx Management Plan
- GBV/SEA/SH Prevention Plan
- Management Plan for Roads in Floodplains or Prone to Flooding
- Security Management Plan
- Actions to ensure Resource Efficiency, Pollution Control and Management
- Actions for Environmentally Sound Set up of Equipment Staging Areas.
- Stakeholder Engagement Plan

## 6.6 Mitigation Measures to Address Environmental and Social Risks and Impacts

The mitigation measures to address identified E&S risks and impacts shall be in line with the mitigation hierarchy provided in the ESF which is as follows:

- a) Anticipate and **AVOID** risks and impacts;
- b) Where avoidance is not possible, **MINIMIZE** or reduce risks and impacts to acceptable levels;
- c) Once risks and impacts have been minimized or reduced, **MITIGATE** and;
- d) Where significant residual impacts remain, **COMPENSATE** for or offset them, where technically and financially feasible.

### 6.6.1 Guidelines for Applying Mitigation Measures

**Avoidance:** The concept behind proffering and applying mitigation measures through avoidance is to ensure that the project design, activities etc. can be carried out in such a way that they do not increase the likelihood for the E&S risk and impacts occurring in the first place. Such measures are proactive, and eliminate the chances of the envisaged impact occurring or extending over a period.

**Minimization:** If avoidance is not feasible, the next step is to minimize the negative impacts. The concept of minimization is to reduce the effect of the risk to a level acceptable or bearable by the environmental, social or human receptor receiving the adverse impact or been exposed to the risk. Measures which result in risk minimization will not eliminate the risk. However, such measures ensure that the receptor can deal with the E&S risk or impacts without affecting the implementation and viability of the sub-project or intervention work. Furthermore, minimization could involve modifying project plans, designs, or operational practices to reduce the magnitude or extent of potential harm. Minimization measures aim to optimize project performance while mitigating environmental and social risks.

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**Mitigation:** Is the summary and/or interplay of applying avoidance, and minimization to reduce E&S impacts such that project E&S performance is acceptable and the project environmentally and sustainably sustainable.

**Compensation:** As a last resort, the mitigation hierarchy includes compensation measures to offset residual adverse impacts that cannot be avoided, minimized, or fully restored. Compensation may involve providing affected communities with alternative resources or livelihood opportunities, implementing biodiversity offsets, or funding conservation or restoration activities elsewhere.

Table 22 below shows the potential environmental and social risks and impacts identified earlier in Chapter 5 and how the mitigation measures should be applied.

**Table 22: Potential Environmental and Social Risks and Impacts and Mitigation Measures Associated with the Sub- Projects/Intervention Works under RAAMP-SU**

Pre- Rehabilitation/Pre-Construction Phase		Mitigation Measures
<b>Environmental Risks</b>	<b>Environmental Impacts</b>	
<ul style="list-style-type: none"> <li>Air Pollution</li> </ul>	<ul style="list-style-type: none"> <li>The release of fugitive dusts, and fibrils during offload of construction materials, site clearing, siting of staging areas and workers campsites, etc.</li> <li>Carbon emissions from exhaust fumes of vehicles during mobilization/transportation of equipment to project locations</li> </ul>	Measures should be targeted at dampening or watering the road surface using water trucks or sprinkler systems, distributing PPEs such as nose masks or respirators to workers/PAPs, and ensuring that vehicles are serviced.
<ul style="list-style-type: none"> <li>Soil contamination/ compaction</li> </ul>	<ul style="list-style-type: none"> <li>Localized loss of topsoil due to stacking of heavy-duty equipment</li> <li>Leakages may occur from stacked equipment containing oil which could result in the seeping-through of oil into the soil, thereby leading to possible contamination of soil</li> </ul>	Measures should include limiting vehicle and equipment weight impacts (designate an area for parking and stacking equipment) etc.
<ul style="list-style-type: none"> <li>Waste generation</li> </ul>	<ul style="list-style-type: none"> <li>Generation of Construction and Demolition Wastes</li> </ul>	Preparation of a Waste Management Plan (WMP)
<ul style="list-style-type: none"> <li>Noise pollution</li> </ul>	<ul style="list-style-type: none"> <li>Noise impacts are envisaged during siting of staging areas and workers campsite, relocation of structures within the ROW etc.</li> </ul>	Measures should be targeted at retrofitting vehicle exhausts with sound -proofing devices and providing PPEs
<b>Occupational Health and Safety Risks</b>	<b>Occupational Health and Safety Impacts</b>	
Exposure to dust and harmful fumes	Air pollution from dust and exhaust fumes of vehicles and equipment resulting to OHS risks e.g. respiratory infections and diseases	Preparation of an Occupational Health and Safety Management Plan (OHSMP) to guide management of OHS risks.
Exposure to increase in baseline noise level	Exposure of workers to increased noise pollution during movement of equipment to work areas and offloading of construction materials	

Pre- Rehabilitation/Pre-Construction Phase		Mitigation Measures
<b>Social Risks</b>	<b>Social Impacts</b>	
<ul style="list-style-type: none"> <li>Noise level increases</li> </ul>	<ul style="list-style-type: none"> <li>Noise during pre-rehabilitation activities is envisaged.</li> </ul>	Measures should be targeted at retrofitting vehicle exhausts with sound -proofing devices. Provide ear muffs
<ul style="list-style-type: none"> <li>Grievances, Complaints, Disruption of Activities and Vandalization</li> </ul>	<ul style="list-style-type: none"> <li>Grievances from community locals as a result of relocation of structures within the ROW</li> <li>Negative impact on host community dynamics as an outcome from labour influx</li> <li>Intrusion into farmlands and possibly sacred sites</li> </ul>	Implement a RAP or an ARAP as the case may be  Ensure early and continuous stakeholders' engagement  A project Level Grievance Redress Mechanism (GRM) should be prepared to address grievances. Specially, the environmental and social assessment report for sub-project/intervention works should contain a chapter on Grievance Redress at the sub-project level.
<ul style="list-style-type: none"> <li>Risk of exclusion from project benefits</li> </ul>	<ul style="list-style-type: none"> <li>Grievances, conflicts, poor perception of the project and reduced stakeholders' satisfaction</li> </ul>	Ensure inclusion of host communities in decision making and project benefits

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Pre- Rehabilitation/Pre-Construction Phase		Mitigation Measures
Social Risks	Social Impacts	
<ul style="list-style-type: none"> <li>Risk of conflicts</li> </ul>	<ul style="list-style-type: none"> <li>Possible conflicts of interest between (Contractors, interest groups, community associations, RAAMP-SU project staff)</li> <li>Possible conflicts between Project Affected Persons (PAPs) and contractors</li> </ul>	<p>A project level GRM should be prepared to address grievances. Specially, the environmental and social assessment report for sub-projects/intervention works should contain a chapter on Grievance Redress at the sub-project level.</p> <p>Additionally, Contractors must prepare a CESMP. It is noteworthy to state that RAAMP-SU is preparing a Labour Management Procedure (LMP), as a stand-alone Report to address labour management issues at the broader level for the RAAMP-SU</p>
<ul style="list-style-type: none"> <li>Delayed travel time</li> </ul>	<ul style="list-style-type: none"> <li>Traffic impacts may occur during transport of materials</li> </ul>	Prepare Traffic Management Plan (TMP)
<ul style="list-style-type: none"> <li>Injuries and possible deaths</li> </ul>	<ul style="list-style-type: none"> <li>Incidents and/or accidents may occur during transportation of materials to project site.</li> </ul>	Prepare TMP
<ul style="list-style-type: none"> <li>Economic and Physical Displacement</li> </ul>	<ul style="list-style-type: none"> <li>Displacement or relocation of persons (Mainly owners of structures and farmlands within the ROW.</li> </ul>	The RAAMP-SU should see to the implementation of a RAP or an ARAP

Rehabilitation/Construction Phase		Mitigation Measures
Environmental Risks	Environmental Impacts	
<ul style="list-style-type: none"> <li>Air Pollution</li> </ul>	<ul style="list-style-type: none"> <li>Air Pollution from fugitive dusts and carbon emissions from exhaust fumes during civil works and operation of work vehicles and equipment, respectively</li> </ul>	Measures should be targeted at dampening or watering the road surface using water trucks or sprinkler systems, distributing PPEs such as nose masks or respirators to workers/PAPs, and reducing emissions by retrofitting with emission controls for vehicles and ensuring that vehicles are serviced regularly.
<ul style="list-style-type: none"> <li>Soil Pollution</li> </ul>	Soil Pollution: Leakages from construction wastes such as disused oil (fuel, lubricants), cement, and paint may occur	Measures should be targeted at storing of hazardous materials such as oil, fuel, lubricants, cement, and paint in designated containers
<ul style="list-style-type: none"> <li>Noise level increases</li> </ul>	<ul style="list-style-type: none"> <li>Noise level increase during civil works and operation of work vehicles and equipment</li> </ul>	Provide PAPs with PPEs such as earplugs or earmuffs and Implement noise control measures during construction, such as mufflers or silencers on machinery and <b>fulfils the requirements of ESS 2</b>
<ul style="list-style-type: none"> <li>Energy wastage</li> </ul>	<ul style="list-style-type: none"> <li>Energy wastage due to inefficient or unnecessary consumption of energy resources e.g., diesel, electricity</li> </ul>	Measures should be targeted at ensuring resource efficiency and alternating operations to reduce energy losses
<ul style="list-style-type: none"> <li>Generation of CD-wastes</li> </ul>	<ul style="list-style-type: none"> <li>Significant amounts of wastes will be generated onsite. These wastes may include debris, top soil, disused materials and containers, food wastes etc.</li> </ul>	<p>Measures should be embedded in sub-project level WMPs. Measures should focus on source reduction, sorting, collection, reusing, recycling, transporting, containment, treatment final disposal etc. <b>Fulfils the requirements of ESS 3</b></p> <p>Measure should include plans which address waste collection at source. <b>Fulfils the requirements of ESS 3</b></p>
<ul style="list-style-type: none"> <li>Surface water contamination</li> </ul>	<ul style="list-style-type: none"> <li>Possible pollution of surface water via oil/lubricant spills from machinery, batteries acid etc.</li> <li>Construction of river crossings may result in sediment runoffs in nearby streams/rivers</li> </ul>	Measures should be targeted at implementing spill prevention and containment
<ul style="list-style-type: none"> <li>Impacts on Natural Habitats</li> </ul>	<ul style="list-style-type: none"> <li>Possible disruption of local habitats and wildlife during excavation</li> </ul>	Mitigation measures should be targeted at conducting thorough habitat surveys prior to excavation activities to identify sensitive areas and wildlife habitats

Rehabilitation/Construction Phase		Mitigation Measures
Social Risks	Social Impacts	
<ul style="list-style-type: none"> <li>Noise level increases</li> </ul>	<ul style="list-style-type: none"> <li>Residents of communities may experience unusual noise specifically, from civil works and use of heavy machineries.</li> </ul>	Mitigation measures should be targeted at utilizing scheduling movement options to reduce or minimize the impacts of noise disturbances around residential areas/locations.

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<ul style="list-style-type: none"> <li>Grievances, Complaints, Disruption of Activities and Vandalism</li> </ul>	<ul style="list-style-type: none"> <li>Grievances from community locals as a result of relocation of structures within the ROW</li> <li>Negative impact on host community dynamics as an outcome from labour influx</li> <li>Impact on existing infrastructures which may be accidentally damaged or destroyed during the movement of heavy-duty vehicles and equipment</li> </ul>	<p>Implement GRM at the level of the sub-project</p> <p>Early and continuous Stakeholder Engagement is mandatory and <b>fulfils the requirements of ESS 10</b></p> <p>Implement a RAP or ARAP</p>
<ul style="list-style-type: none"> <li>Grievance and Conflicts</li> </ul>	<ul style="list-style-type: none"> <li>Grievances may arise due to activities around sacred sites</li> </ul>	<p>Implement Physical Cultural Resources Management Plan and or a Chance Find Procedure</p>
<ul style="list-style-type: none"> <li>Risk of violent or non-violent conflicts</li> </ul>	<ul style="list-style-type: none"> <li>Conflicts of interests may arise during decision making at the project implementation level; between Contract workers and general labour, etc. .</li> </ul>	<p>Implement GRM at the level of the sub-project/ intervention works.</p> <p>Stakeholder Engagement</p> <p>Mitigation measures should be implemented through provisions in the CESMP.</p> <p>Stakeholder Engagement, Sensitization and capacity building for all cadre of workers should be conducted.</p> <p>Enforce CoC</p>
<ul style="list-style-type: none"> <li>Risk of Illicit Behaviour and Crime</li> </ul>	<ul style="list-style-type: none"> <li>Theft, physical assaults and substance abuse attributable to labour influx. Additionally, there may be increase in unprotected sexual intercourse due to labour influx thereby increasing the risks of Sexually Transmitted Diseases (STDs) and Sexually Transmitted Infections (STIs).</li> </ul>	<p>Implement LMP</p> <p>Awareness and training and</p> <p>Enforcement of the CoC cadres.</p>
<ul style="list-style-type: none"> <li>Risk of social conflicts</li> <li>Risk of illicit behaviour</li> <li>Security risks and threats</li> </ul>	<p>Labour influx may lead to:</p> <ul style="list-style-type: none"> <li>Risk of social conflicts between local community and the construction workers</li> <li>Risk of illicit behaviour and practices e.g., substance abuse which may also be on the increase following the influx of migrant contractor workers across project locations.</li> <li>Contracted workers such as Contractors may be exposed to security threats such as vandalization and destruction of their assets and possibly kidnapping.</li> </ul>	<p>Implement Labour Management Plan, LMP; training and enforcement of the CoC cadres</p> <p>Conduct SRA prior to commencement of civil works and implement SMP during the project life cycle.</p> <p>Contractors should include their own security measures and plans in the CESMP</p>
<ul style="list-style-type: none"> <li>SEA/SH and VAC (GBV)</li> </ul>	<ul style="list-style-type: none"> <li>Women and girls may be exposed to SH/SEA as a result of interactions with workers and possibly followers.</li> </ul>	<p>GBV risk assessment and mapping of GBV services; Align with Project GBV mitigation Plan</p> <p>Sensitization campaigns and awareness</p>
<ul style="list-style-type: none"> <li>Child Safety</li> </ul>	<ul style="list-style-type: none"> <li>Children may be exposed to various forms of violence from workers.</li> </ul>	<p>Enforcement of all Cadres of CoCs etc</p>
<ul style="list-style-type: none"> <li>Exposure to accidents</li> </ul>	<ul style="list-style-type: none"> <li>Unreclaimed and abandoned borrow pits may pose safety risks for children and other persons in communities.</li> <li>Likely accidents while pedestrians are crossing access roads.</li> </ul>	<p>Applications of suitable measures that <b>fulfil the requirements of ESS 4</b> e.g., Community Health and Safety Plan</p> <p>Preparation of Borrow Pit Management and Reclamation Plan</p> <p>Preparation of TMP</p>
<ul style="list-style-type: none"> <li>Security risks and threats</li> </ul>	<ul style="list-style-type: none"> <li>Communities already exposed to security risks and threats may experience heightened security threats due to ongoing intervention works. E.g., kidnapping. Similarly, communities void of security risks and threats may suffer such when sub-projects commence.</li> </ul>	<p>Mitigation measures should be targeted at conducting SRA prior to commencement of civil works and implement SMP during the project life cycle</p>
<ul style="list-style-type: none"> <li>Restricted access along project locations</li> </ul>	<ul style="list-style-type: none"> <li>Road users may suffer restricted access to selected roads when intervention works are ongoing.</li> </ul>	<p>Early notification and sensitization of PAPs</p>
<ul style="list-style-type: none"> <li>Physical and Economic Displacement</li> </ul>	<ul style="list-style-type: none"> <li>Implementation of civil works may result to reclamation of the ROW and impact on livelihoods.</li> </ul>	<p>Implement RAP or ARAP</p>
<p><b>Occupational Risks</b></p>	<p><b>Occupational Impacts</b></p>	



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OHS Risks	Most activities could predispose personnel to hazards. “Unsafe behaviours” and “Unsafe conditions” will pose a serious OHS risk.	Measures should apply the “Hierarchy of Controls” according to OHS principles – Elimination, Substitutions, Engineering Controls, Administrative Controls and PPEs.
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Operation Phase		Mitigation Measures
<b>Environmental Risks</b>	<b>Environmental Impacts</b>	
<ul style="list-style-type: none"> <li>Air pollution</li> </ul>	<ul style="list-style-type: none"> <li>Deterioration of local air quality due to the release of dust and exhaust gases</li> </ul>	Installation of speed breakers and speed limit to reduce vehicular speed
<b>Social Risks</b>	<b>Social Impacts</b>	
<ul style="list-style-type: none"> <li>Loss of employment</li> </ul>	<ul style="list-style-type: none"> <li>Workers will be relieved of their duties at the commencement of the operational phase.</li> </ul>	Describing clauses clearly, and duration of engagement in contract agreements.  Transparency in engagement negotiations and timely notification on end of contracts prior to end-dates
<ul style="list-style-type: none"> <li>Road accidents</li> </ul>	<ul style="list-style-type: none"> <li>Increase in road accidents long rehabilitated roads</li> </ul>	Installation of speed breakers and speed limit to reduce vehicular speed

### 6.7 Required Site Specific Management Plans (as per relevant ESSs)

The ESF points to requirements in the ESSs that are established during the preparation of the E&S Assessment. Consequently, some of these requirements may require that certain actions (e.g., Chance Find Procedures) are taken or the preparation of site-specific management plans (e.g. Cultural Heritage Management Plan/Physical Cultural Management Plan) to address specific adverse E&S risks and impacts. Additionally, while some of these actions/management plans may be included in the E&S assessment; they may be expanded in stand-alone documents, in order to fulfil reporting obligations on E&S performance of RAAMP-SU implementation to the Bank.

#### 6.7.1 Community Health and Safety

##### 6.7.1.1 Accident Investigation and Analysis

The RAAMP-SU prerogative is to approach accident investigation and analysis from a proactive point of view by establishing procedures for investigating, assessing and analysing the causes of workplace accidents during implementation of the project and operational phases of its interventions. Safeguards Units will largely take responsibility for this activity. The Accident investigation should attempt to identify the root cause of the accident through a root-cause analysis and not limit the investigation to only surface causes as this might be misleading. Furthermore, the entire process should be able to provide details on i) time of accident, ii) place of accident iii) gender, age, height of person(s) involved, iv) number of injured persons or mortalities, v) photographs of accident scenes, vi) summaries of one-on-one interview or focus group discussions with eyewitnesses etc. **(See Annex 11: Sample Accident Investigation Form)**. More so the analysis should as well produce data such as monthly incident and accident rates, near misses, loss hours, etc. **Notably, accident investigation and analysis meet the requirements of ESS 4.**

##### 6.7.1.2 Accident Investigation and Analysis Reporting

Where the accident occurs at a state-level intervention work or sub-project, the Safeguards Unit of the respective RAAMP-SU Prospective States and the FCT shall conduct the accident investigation and analysis together with the Supervisory Consultant and Contractor using the World Bank Group’s Environment and Social Incident Response Toolkit (ESIRT)<sup>60</sup>. The Report shall be submitted to the Safeguards Unit at the RAAMP-SU FPMU for review, clarifications and comments before submission of a final ESIRT report (containing a thorough Root Cause Analysis - RCA) to the Bank. Findings of RCA will be used by the Contractor and SPIUs to develop measures to be included in a Safeguards/Standards Corrective Action Plan (SCAP). Similarly, if required, the SPIU responsible for the intervention works shall report the accident to the appropriate authorities in the State (e.g., FMLE) after

<sup>60</sup> The ESIRT shall adhere to the following steps: Step 1- Initial Communication, Step 2 - Classification - Assessing the severity of the incident, Step 3 – Notification Who needs to know about the incident? Step 4 – Investigation What happened and why? Step 5 – Response, Step 6 – Follow up

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consultations with the Safeguards Unit at the RAAMP-FPMU. If an accident occurs at the level of the FPMU, the report shall be made directly to the Bank and the FDRD on request. It is also noteworthy to state that several states have existing protocols for reporting and documenting data centrally and have suggested that their state systems be maintained (also for accidents) where appropriate.

**Note:** A Fatality Tracking System (FTS) for OHS has been developed by the Bank to: i) provide task teams a tool to monitor and report on fatalities that occur in connection with their projects, ii) track actions taken to address problems that cause fatality, iii) aggregate data used to highlight hotspots and to focus attention where preventive measures are needed most to help avoid future incidents, iv) reporting to Regional Vice Presidents (RVPs) and network Vice Presidents (VPs) on fatalities every quarter.

### 6.7.1.3 Adopting Good Practice Notes (GPNs) on Community Health and Safety (CHS)

In its attempt to address potential CHS hazards and risks, it is essential and pertinent that the RAAMP-SU through the FPMU and SPIUs adopts the ESF GPNs on CHS. The GPN may also be included in the bidding documents for Contractors, so as to establish guidance and ensure conformity with the RAAMP-SU in its approach towards avoiding, reducing or mitigating adverse impacts on CHS; which should be consistent with the requirements of ESS4. The process for adopting GPNs on CHS should address the following ESS4 requirements i) Community Health and Safety, ii) Infrastructure and Equipment Design and Safety, iii) Safety of Services, iv) Traffic and Road Safety, v) Ecosystem Services (where applicable), vi) Community Exposure to Health Issues, vii) Management and Safety of Hazardous Materials, viii) Emergency Preparedness and Response and ix) Security. See **Annex 10 Excerpts on Good Practice Notes on Community Health and Safety**.

### 6.7.1.4 Emergency Prevention, Preparedness and Response

ESS 4 mandates Borrowers engaged in projects having the potential to generate emergency events to conduct a Hazard Risk Assessment (HRA) as part of the environmental and social assessment undertaken pursuant to ESS1. Based on the results of the HRA, the Borrower will prepare an **Emergency Response Plan (ERP) (See Annex 5)** in coordination with the relevant local authorities and the affected community. Comparably, emergency prevention, preparedness and response may be part of environmental and social assessments prepared by the respective RAAMP-SU Prospective States and the FCT, and more explicitly an essential aspect of the CESMPs to be prepared by the Contractors. At a national level, the National Emergency Management Agency (NEMA) provides coordinating responsibilities in the event of emergencies, while the State Emergency Management Agency (SEMA) provides same sub-nationally. NEMA has provided RAAMP-SU with its National Disaster Management Framework, which has been adopted in this ESMF and streamlined to practically suite coordination and response to emergencies during implementation at state-level. The schematic in Figure 15 is adopted from the national approach and shall be applied by the RAAMP-SU to respond to emergencies.

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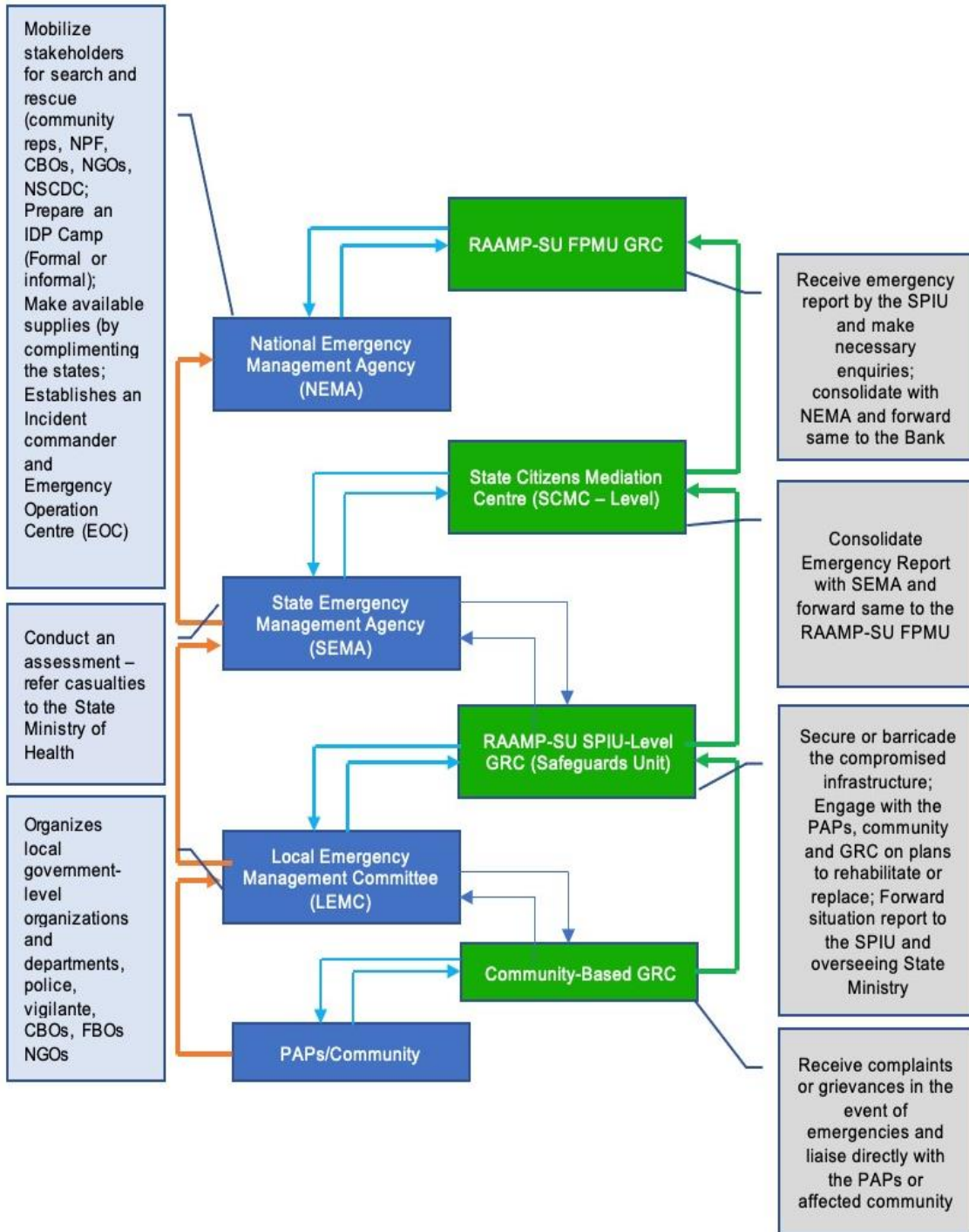


Figure 15: Emergency Response Schematic Chart for RAMP-SU

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Consequently, where conventional approaches by government agencies may be designed to respond or react more to emergencies rather than plan to prevent them, RAAMP-SU will fully apply emergency prevention, preparedness and response requirements of ESS 4 and the EHSGs. If any emergency was to occur during the implementation of sub-projects, a greater number is likely during the rehabilitation/construction phase.

Based on field visits and review of the 2023 report on Climate Impacts, Policies and Actions at the Subnational Levels in Nigeria, unanticipated incidents<sup>61</sup> which may arise from both natural and man-made hazards may include:

### Natural Hazards:

- **Heavy Rainfall and Flooding:** Intense rainfall, especially during the rainy season in some RAAMP-SU Prospective States, may lead to flooding along road rehabilitation/construction sites, causing erosion, washouts, and delays in construction activities. Notable at-risk states include Kogi, Edo, Kwara, Oyo, Anambra, Enugu, Bayelsa, Cross River, Adamawa, Katsina, Kano, etc.
- **Soil Erosion:** Nigeria's varied terrain may include areas within RAAMP-SU Prospective States, which are prone to soil erosion. This could threaten intervention works, damage infrastructure, thus requiring additional stabilization measures.
- **Tropical Storms:** RAAMP-SU Prospective States which are within the country's coastal regions are susceptible to tropical storms, which could bring strong winds, heavy rainfall, and storm surges, which have the potential to cause damage to proposed intervention works during the construction and operation phases. Notable at-risk states include Lagos, Delta, Ondo, Bayelsa, Rivers, Akwa-Ibom, Cross River, etc.
- **Drought and Desertification:** In arid regions of Nigeria where most of the North-West and North-East RAAMP-SU Prospective States occupy, drought conditions and desertification may lead to soil degradation and instability, affecting crop yield and food for local communities. These natural disasters may as well pose challenges for proposed intervention works in the form of aggravating soil instability, causing sand encroachment and increasing infrastructure vulnerability. This means that sub-project designs may require adaptation strategies for both the sub-projects and the communities where they are located.

### Man-Made Hazards:

- **Community Opposition and Protests:** Local communities may raise concerns or protests against sub-projects/intervention works due to environmental, social, or property rights issues, leading to delays, disputes, or even project cancellations.
- **Security Concerns:** In certain RAAMP-SU Prospective States affected by insecurity and conflict, sub-projects/intervention works including workers may face security threats such as vandalism, theft, or attacks, impacting project timelines and workers safety.
- **Material Shortages and Supply Chain Disruptions:** Unforeseen shortages of construction materials or disruptions in the supply chain due to factors such as transportation challenges, market fluctuations etc. may delay construction activities.
- **Utility Interference:** Encountering unexpected conflicts with existing underground utilities such as water pipelines, gas lines, or electrical cables during excavation and construction may require sub-project redesign, reappraisal, re-screening and scoping, re-routing and could cause delays.
- **Political and Regulatory Challenges:** Changes in government policies, regulations, or bureaucratic processes may occur unexpectedly, leading to delays, additional approvals, or legal hurdles that affect the progress of sub-projects/intervention works.

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<sup>61</sup> "Unanticipated incidents" refer to events or occurrences that happen unexpectedly or without prior warning. These incidents are not foreseen or predicted, and they often catch people off guard because they were not prepared for them. Unanticipated incidents can range from minor inconveniences to major emergencies, depending on the context in which they occur. For RAAMP-SU implementation, understanding and managing unanticipated incidents is crucial for minimizing their impact and ensuring preparedness for future unforeseen events.

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- **Accidents and Worksite Injuries:** On-site accidents, injuries, or fatalities involving construction workers or equipment could occur unexpectedly, requiring immediate response, investigation, and potential adjustments to safety protocols.

### 6.7.2 Security Risk Assessment and Management

It is required that all RAAMP-SU Prospective States prepare a “**Security Risk Assessment (SRA) and Security Management Plan (SMP) (See Annex 4)**” for the assessment and management of security risks associated with the implementation of intervention works and other activities in their respective states. The SRA should take into perspective the pre-existing security risks in the RAAMP-SU states and in particular, risks in the locations selected for proposed subprojects/intervention works. The SRA will also identify those security risks and threats<sup>62</sup> which are likely to occur or increase as a result of the project. The process should as well identify assets requiring protection from such risks and threats. Figure 16 below provides guidance on the approach to be adopted by RAAMP-SU in conducting the SRA.

Based on the application of the Mitigation Hierarchy to determine the risk level of security risks and threats, the resulting SMP should proffer mitigation measures proportionate to the risk level assigned to the threat. For example, low risk threats may require simple fencing and lighting of premises, while substantial and high-risk threats may require procurement of professional or armed security services, and or liaison with agencies of the security infrastructure in the states or nationally. **See Annex 4: Guidance for Drafting Security Management Plan**

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<sup>62</sup> **Physical threats:** crime, terrorism, kidnapping, gender-based violence, **Organizational threats:** legal challenges, corruption, blackmailing, **Environmental threats:** natural disasters, health and medical problems, stress



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### 1 Actor Mapping

**Who:** At national and state-levels, key individuals, groups, organizations, state institutions and other stakeholders responsible for security or capable of affecting security operations and arrangements established by RAAMP-SU should be identified, mapped and sorted e.g., “non-risk/threat causing” and “risk/threat causing” actors. Positive actors will improve the resilience and security infrastructure set-up by RAAMP-SU. Negative Actors however, may include criminal groups, kidnapers, terrorist etc.

**What:** RAAMP-SU shall enquire, assess and evaluate the influence – political, social, economic, risks, ethnic, religious threats and opportunities the “Actors” may play in implementation of the project

### 2 Identification of Security Risks and threats

A critical approach in the SRA for RAAMP-SU will be to identify threats to project implementation, and especially in the RAAMP-SU participating states and the FCT. These threats may delay subproject implementation and completion; delay payment to Contractors, increase workforce and community casualties in project locations etc. Some of the threats to be considered may include:

- **Violence-related Risks and Threats:** (Targeted armed robbery attack, non-targeted armed conflict, Kidnapping, Terrorism, Use of Improvised Explosive Device (IEDs), bombing), SEA/SH, Civil unrest, religious violence, Crime, Other types of violence.
- **Project Structuring and Arrangement Risks and Threats:** Reputation risk, financial risks, Legal risks (work permits, compliance with quality assurance and control). Note that the security arrangements made on a particular RAAMP-SU intervention may also pose risks and threats on project workers, Contractors staff and local communities.
- **Environmental and Social Risks and Threats:** Natural hazards (flooding, soil erosion, coastal erosion), Medical risks (access to suitable medical treatment for staff), Health-related issues (food, water, disease, stress), Traffic and roadside accidents, surface water contamination or pollution, Farmers/herdsmen clashes etc.

### 3 Assess and Evaluate the Risks and Threats

Once the types of threats have been identified by the FPMU or SPIUs as the case might be, they should be evaluated and the level of risk to all the cadres of staff as captured in the LMP, assets, subprojects/intervention works, operations etc. This will help clarify how severe the risks/threats are and how much priority it must be given. Additionally, the Risk Classification in the ESF can be applied to ascertain which security risks and threats are Low Risk, Moderate Risk, Substantial Risk and High Risk.

### 4 Develop Strategies to Reduce Risk & Vulnerabilities

Once the threats that may affect subproject implementation and operations or other programs of the RAAMP-SU have been identified and evaluated, and the risks rated, SPIUs are required to recommend risk mitigation measures to address these vulnerabilities in the form of an SMP. The goal of security risk management (as captured in the SMP) is Avoid, Reduce and Mitigate barriers to delivering RAAMP-SU Components' deliverables. Additionally, the SMP should enable all cadres or workforce e.g., Contractors, to stay engaged and implement the scope of works or work orders in their Contract Agreement despite the level of risk. Developing the SMP is a critical step in ensuring that RAAMP-SU through its participating states and the FCT, is taking all reasonable steps to avoid, reduce and minimize the security risks and threats before committing Direct workers, Contracted workers, Primary supply workers, resources, etc.

Figure 16: SRA Process to Guide Preparation of SRAs and SMPs by RAAMP-SU SPIUs



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### 6.7.3 Labour and Working Conditions

#### 6.7.3.1 Working Conditions and Management of Relationships

The RAAMP-SU has developed and shall implement Labour Management Procedures (LMP) applicable to the project. These procedures set out the way in which project workers will be managed, in accordance with the requirements of national law and ESS 2. The purpose of the LMP is to facilitate planning for the project and help identify the resources necessary to address the labour issues associated with the project. Furthermore, ESS2 also requires that measures relating to Occupational Health and Safety (OHS) be applied to the RAAMP-SU. The OHS measures will include the requirements of ESS 2, and will take into account the General EHSGs and, as appropriate, the industry-specific EHSGs and other Good International Industry Practice (GIIP).

#### 6.7.3.2 Occupational Health and Safety (OHS) Good International Industry Practices (GIIP)

OHS hazards, risks and opportunities throughout implementation activities, especially involving workers shall be addressed in the environmental and social assessment, likewise supporting documents from Contractors such as the CESMP. The nature of the OHS risks shall be dependent on the type of work being undertaken. These risks may present from an environmental<sup>63</sup> and social<sup>64</sup> perspective. The Hierarchy of Controls<sup>65</sup> shall be applied in addressing OHS risks and impacts.

##### 6.7.3.2.1 Contractors Occupational Health and Safety Policy

Contractors procured by RAAMP-SU to implement sub-projects/interventions shall maintain a statement of commitment to assure the health and safety of their workers, especially those engaged as unskilled personnel from host communities/project areas. Similarly, prospective states, through their RAAMP-SU SPIUs should demonstrate commitment to safety of all types of workers under their project. Contractors should have their own corporate OHS Policies and Occupational Health and Safety Management Systems (OHSMS), which may be captured in the CESMP or as a single document. The respective RAAMP-SU SPIUs shall ensure that the provisions of the Contractors OHS policy are been fulfilled especially towards its workforce involved in civil works under the project.

##### 6.7.3.2.2 OHS Planning

SPIUs and Contractors should take note of the following OHS inputs:

- a) **Incorporating health and safety when preparing engineering designs and work designs:** This requires that the preparation of engineering designs and drawings is a thoughtful process, where health and safety is factored into every detail. The design should be such that it eliminates, substitutes, controls (reduces) and creates a barrier (personal protection) for workers during the rehabilitation/construction phase, including project beneficiaries. For example, OHS inclusion in design will include substituting asphalt and petroleum-based products with recycled materials such as Recycled Asphalt Pavement (RAP), bio-asphalt or bio-bitumen in the design; and/or ergonomic criteria for workstation design with consideration to potential health and safety hazards and risks for office-based workers.
- b) **Accountability on the part of management and labour towards health and safety of the workplace:** It is pertinent for all worker types<sup>66</sup> to understand that they are liable; legally bound or subject to giving an

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<sup>63</sup> from exposure to toxins, atmospheric/weather stress, dusts, infectious pathogens, hazardous energy etc.

<sup>64</sup> Work schedule timeline; lack of break and resting periods, poor or no workers compensation packages etc

<sup>65</sup> Hierarchy of Controls: Elimination, Substitution, Engineering Controls, Administrative Controls and Personal Protective Equipment (PPEs)

<sup>66</sup> **Worker Types as captured in the RAAMP-SU LMP**

##### a) Direct workers

Direct workers include people employed or engaged directly by the Government of Nigeria. This category of workers will comprise a mix of government civil servants from various relevant line ministries, staff of the FPMU, SPIUs, and those deployed as technical consultants' Officer. Additional workforce at the SPIU will be determined at State level. The FPIU/SPIUs will be set up prior to Program effectiveness and are maintained throughout Program implementation.

##### b) Contracted workers

Contract workers include people employed or engaged through the RAAMP-SU FPMU and RAAMP-SU SPIUs and third parties to perform work related to core functions of the Project, regardless of location. Two broad categories of contracted workers are expected. Firstly, consultant service providers who will provide implementation support services to the FPMU and SPIUs. Secondly, the staff of contractors, suppliers, and sub-contractors etc. The requirements of

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account on OHS as it applies to their work jurisdictions and work scope, including responsibilities either as part of management or part of labour. This further implies that an effective accountability system should be part of the OHS Management efforts of the FPMU, SPIUs and Contractors etc. To a minimum, the accountability system should consist of the following elements:

- 1. Formal Standards of Performance:** It is important that safety policies and disciplinary procedures be clearly stated in writing and made available to all Contractors etc. It is necessary to educate all employees (RAAMP-SU staff, Contracted Workers etc.) on these policies and procedures. Make sure they certify that they have read, understood, and will comply with those safety policies and procedures. This should be done during sensitive activities for example **during procurement of Contractors, when Contractors are procuring their personnel**, and monthly, quarterly or annually thereafter. If standards of acceptable behaviour and performance are not established and clearly communicated to the workforce, an effective accountability system is impossible. This could be a stand-alone documentation or form part of the CoC for Contractors.
- 2. Adequate Resources and Psychosocial Support:** Before the RAAMP-SU FPMU, SPIUs or relevant parties are justified in administering appropriate consequences; likewise, Contractors to their workers, the means and methods to achieve the standards of performance that have been established should first be provided. The Contractor's OHS Manager, should assure that communities where civil works will be carried out are safe, and free from any forms of social unrest or fragility. Where such is beyond the control of the Contractor, the project should assure that its **SMP** is implementable. This however should not restrict the Contractor from carrying out its own due diligence and making its own security arrangements. Furthermore, Contractors should provide their workers with all physical resources and psychosocial support required to carry out their work in a safe and healthful manner.
  - **Physical Resources.** Ensure safe and healthful conditions, Safe tools, equipment, machinery, materials, workstations, facilities, environment.
  - **Psychosocial Support.** Ensure safe behaviors such as effective safety education and training, reasonable work schedules and production quotas, human resource programs, safe work procedures, competent management, and leadership.
- 3. A System of Performance Measurement:** This will require a deliberate and committed approach by the RAAMP-SU to maintain data and statistics on OHS within its operations. Where SPIUs record, document, store and share information and data; such OHS data should include to a minimum i) accident rates, ii) injuries, iii) deaths, iv) near misses, v) lost hours, vi) compensation costs/paid, vii) number of trainings on certain OHS subject areas e.g., sanitation safety and other parameters/Key Performance Indicators (KPIs). The performance measurement should be based on the SMART criteria. It should be Specific, Measurable, Achievable, Relevant and Time-bound (SMART). Suitable analytical tools should be applied by well trained personnel. The idea here is that OHS officers/managers of the Contractors are to generate data which should be shared with the SPIUs and forwarded to the FPMU and Bank respectively.
- 4. Appropriate Application of Effective Consequences:** Effective consequences increase desired behaviours or decrease undesired behaviours. If Contractors/workers safety performance meets or exceeds the standards set by the project, some sort of recognition should follow. On the other hand, if Contractors/workers make an informed choice not to comply with the safety provisions in this ESMF or other requisite documents such as OHS mitigation measures captured in E&S instruments, the CESMP etc., some sort of appropriate corrective action should follow. Careful planning is critical to ensure consequences are effective. Note that consequences for negative behaviour are only justified when Training, Resources, Enforcement, Supervision and Leadership (TRESL) have been provided. i.e., from *FPMU to SPIUs; SPIUs to Contractors and Communities; Contractors to Workers; etc.*
- 5. Continuous Evaluation and Auditing of the Contractor's Occupational Health and Safety Management Framework/Occupational Health and Safety Management Plan (OHSMF/OHSMP) for Accountability:** For the RAAMP-SU to enjoy the benefits of good OHSMF/OHSMPs implementation throughout the project cycle., performance measurement is required, must be regular, detailed, identify strengths and weakness and proffer corrective actions. **This shall be measured during an Environmental and Social Audit (ESS1).**

paragraphs 9 to 33 of ESS2 will apply to contracted workers. Contractors will also employ people from the community that have the required capacity and skill.

### c) Primary Supply Workers

Primary Supply workers include people employed or engaged by the GoN's as primary suppliers. These are suppliers who, on an ongoing basis, provide directly to the Projects goods or materials essential for the core functions of the project. The FPMU and SPIU teams must ensure that contractors or suppliers engaged to work in this Project have sound environmental and social management practices in place. Therefore, all suppliers to the RAAMP-SU must be assessed to ensure compliance to the required environmental and social management standards. The assessment should be embedded in the tendering, hiring and contracting processes, and any due diligence measures required in the sourcing of supplies for the activities. The bidding documents for works will include specific requirements that minimize the use of workers from outside the vicinity. While hiring labour from local communities, the contractors will ensure that workers are hired as contract labour and not temporary/day wage labour to the extent possible. The contract documents for works as well as for monitoring consultants require explicit Codes of Conduct to be signed by all workers. Periodic mandatory training of all workers on SEA issues and Code of Conduct. The contractor shall develop a Gender Based Violence (GBV) Action Plan including an Accountability and Response Framework to be included in the CESMP. The requirements of paragraphs 39 to 42 of ESS 2 will apply to primary supply workers.

### d) Government civil servants

Where government civil servants are working in connection with the RAAMP-SU, whether full-time or part-time, they will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the Program. ESS2 will not apply to such government civil servants, except for the provisions of paragraphs 17 to 20 (Protecting the Work Force) and paragraphs 24 to 30 (Occupational Health and Safety).

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### 6.7.3.2.3 OHS Programs for Contractors

Contractors shall develop OHS programs which should be implemented throughout the life cycle of the intervention works. These programs should strengthen the operationalization of the Contractor's OHSMPs and likewise, present opportunities for improvement, lessons learnt and information sharing amongst prospective states. Broadly, these OHS programs should result in simple implementable plans or processes which will feed into the implementation of mitigation measures described in the E&S risk assessment, for the Contractor. The Programs will enable improvement in institutional and technical capabilities. See Table 23 below for examples of OHS programs relevant to RAAMP-SU.

**Table 23: Examples of OHS Programs**

OHS PROGRAMS
<p><b>Projects' Output:</b> A plan of set actions to achieve the expected outcomes of the project.</p> <p><i>For example, a Mechanical Safety Program for proposed intervention works at a rural road site should result in a non-complex plan to identify and control/manage all potential mechanical hazards or risks associated with the rehabilitation works. Such could be prepared by the Contractor and included in the Contractors Environmental and Social Management Plan (CESMP).</i></p> <p><i>Alternatively, all these programs can be incorporated into a general OHSMP for all potential hazards and risks associated with a particular or series of intervention works.</i></p>
<p>Examples include Programs for:</p> <ol style="list-style-type: none"><li>1. OHS Training</li><li>2. Hazard Identification and Risk Assessment</li><li>3. Accident Investigation and Analysis, and Worker's Compensation Claims</li><li>4. Fire Safety</li><li>5. Electrical and Mechanical Safety</li><li>6. Violence Protection Program (excerpts or clauses can be included in the CoC)</li><li>7. Hazard Communication (HAZCOM)</li><li>8. Ergonomics Management</li><li>9. PPEs Procurement and Management</li><li>10. Confined Space</li><li>11. Log Out/Tag Out (LOTO)</li><li>12. Emergency Planning, Preparedness and Response</li><li>13. COVID 19 Prevention and Response</li></ol>

### 6.7.3.2.4 Personal Protective Equipment (PPEs)

Required PPEs must be procured and used for the particular kind of work. RAAMP-SU SPIUs and their Contractors must maintain a PPE inventory or log. Supervisory Consultants and Safeguards Specialist will enforce the use of proper PPEs where and when they are required, at all times. In confined spaces must use required PPEs such as ventilators.

### 6.7.3.2.5 Code of Conduct for Addressing SEA/SH

The Code of Conduct (CoC) should set out the minimum standards expected from the Bank for its Vendors (Contractors, Consultants etc). Largely, it should contain clauses that address proper behaviour of workers engaged under the RAAMP-SU especially in the areas of SEA/SH, VAC and GBV as a whole. Emphatically, the CoC should be included in the bidding documents of Contractors to be engaged by the SPIUs and must be filled by all personnel engaged to undertake intervention works. To a minimum, the CoC shall include the following types: i) Contractors' CoC, ii) Manager's CoC, and iii) Individual CoC. SPIUs must ensure that CoCs also provide comprehensive guidelines on preventing and responding to GBV including SEA/SH and VAC. This should include clear definitions of prohibited behaviours (e.g. forceful and non-consented sexual intercourse especially with minors, cat calls, stalking, alcohol/drug abuse onsite during work hours, fighting, horseplay etc.). The project should

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establish reporting mechanisms in line with the GBV Action Plan (See Annex 6), disciplinary actions, and support services for victims/survivors. Additionally, there should be a robust system<sup>67</sup> in place to monitor compliance and enforce accountability (See GBV Accountability and Response Framework in section 6.10.2) Furthermore, the proposed types of CoC (Contractors', Managers', and Individual CoC) should be tailored to address the specific roles and responsibilities within the project, with a focus on fostering a safe and respectful working environment for all stakeholders (See Annex 6 for GBV Action Plan).

### 6.7.4 Considerations for Selecting Workers' Campsites and Staging Areas

To ensure ease of coordination of operations, a site office and campsite will be established, while each Contractor will be required to identify a staging area for plants & equipment. The locations for the establishment of the Contractors' campsites would be determined in consultation with the IE Resident Engineer, of the respective RAAMP-SU SPIUs (importantly safeguard unit input is required) and the local communities, taking into account the following aspects.

#### Selection Condition/Criteria

- Located outside the protection zone of watercourses (100 m) and wetlands
- Located within an acceptable distance from existing residential areas
- Not located in areas with intact vegetation
- Not located in or around a school premise
- The contractor must first obtain the necessary licenses and consents from the local authorities or from the owner of the needed area;
- The contractor must submit for the prior approval of the Resident Engineer, the implementation design and other project structures and specifications related to the camps and sites that are intended to be built;
- The contractor shall take all necessary measures and precautions to ensure that the execution of the works is carried out in accordance with environmental, legal and regulatory requirements, including those set out in this document; The contractor shall take all measures and precautions to avoid any disturbance in the local communities and among the users of the road, as a result of the project execution;
- All contractor workers (resident and non-resident) must sign CoCs (sample in Annex 12) against GBV/SEA/SH and other illicit behaviours;
- The areas occupied by the camps and sites must be recovered at the end of the project, when the contractor is demobilized, through the replacement of previously existing conditions, unless other uses are intended;
- The contractor must ensure that Separate rooms will be provided for male and female workers and that all necessary sanitary facilities complying with World Health Organization (WHO) regulations will be provided for workers to include but not limited to separate toilets for male and female, portable water with well-placed overhead tanks, wash basins and concrete and covered septic tanks.

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<sup>67</sup> A key element of the CoC is the sanctions that may be applied if an employee is confirmed as a SEA/SH perpetrator. The sanctions need to be proportional to the violation. Prior to imposition of sanctions, if a worker raises a credible challenge to alleged violation with the CoC, the worker's employer should place the worker on administrative leave pending a full and fair review to determine the veracity of said allegation(s). Examples of potential sanctions include the following: a) Informal warning; b) Formal warning; c) Additional training; d) Loss of up to one week's salary; e) Suspension of employment (either administrative leave as above or without payment of salary), for a minimum period of one month up to a maximum of six months; f) Termination of employment; and/or, g) Referral to the police or other authorities as warranted. (Source: WB GPN on SEA/SH in IPF involving major civil works)

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### 6.7.5 Resource Efficiency

The designs of subprojects/intervention works should seek the efficient use of energy during civil works implementation and apply the resource efficiency requirements of ESS 5. Additionally, RAAMP-SU shall adopt measures specified in the EHSs to optimize energy usage, to the extent technically<sup>68</sup> and financially<sup>69</sup> feasible. Activities consider efficiency in the use of raw materials, water, labour, and other resources. Essentially, vehicles and equipment can be turned off when not in use to reduce fuel use and carbon emission. Water used in intervention works to the extent where possible, can also be reused. Additionally, workers camps and equipment staging areas may be provided with lighting through use of energy saving bulbs or solar panels. This could help reduce electricity consumption and consequent recurrent payment of high electricity bills.

### 6.7.6 Land Acquisition, Physical and Economic Displacement

The ESMF recommends that the design of sub-projects/interventions involving civil works under Components 1 and 2 of RAAMP-SU, consider the potential for such designs to contribute to risks and impacts relating to physical and economic displacement of PAPs; in the potential project sites across the 36 states and the FCT. Furthermore, the likelihood of involuntary resettlement resulting from implementation of intervention works and the potential for compensation to PAPs, should be assessed during the preparation of the E&S Assessment. Affirmatively, while the Resettlement Action Plan (RAP), shall address directly and in particular, all matters of physical and economic resettlement resulting from the implementation of subprojects/intervention works, it is ideal and a requirement of ESS 1, that mitigation measures for involuntary resettlement be captured in the E&S assessment.

### 6.7.7 Considerations for Biodiversity Assessment as Part of the E&S Assessment

Depending on how proposed roads identified by states traverse forest areas and vegetation and the potential for proposed intervention works to adversely impact biodiversity around project locations, the environmental and social assessment will consider direct, indirect, and if need be, also consider cumulative project-related impacts on habitats and the biodiversity they support such as forest reserves and protected areas. E&S assessments carried out by the states shall as well consider threats to biodiversity, for example, habitat loss, degradation and fragmentation, invasive alien species, overexploitation, hydrological changes, nutrient loading, pollution and incidental take, as well as projected climate change impacts.

### 6.7.8 Cultural Heritage

In the design of subprojects/intervention works, RAAMP-SU SPIUs shall consider the risks and impacts to cultural heritage. This is in compliance to the requirements of ESS 8, which is also relevant to RAAMP-SU. Such consideration will extend to all phases of the sub-projects/intervention works (pre-rehabilitation/pre-construction; rehabilitation/construction and operation). Similarly, risks and impacts to cultural heritage shall be addressed in the E&S assessment(s) prepared for eligible subprojects/intervention works. Consultations with relevant stakeholders (Federal and State Ministries of culture and tourism etc.), PAPs, review of available heritage inventories, maps, and land or coastal surveys, are all steps that can help to identify cultural heritage, and to understand the nature and significance of the potential environmental and social risks and impacts of sub-projects/intervention works on such heritage. The E&S Assessment shall include a Cultural Heritage Management Plan (CHMP)/Physical and Cultural Resource Management Plan (PCRMP) to address cultural heritage. The box below shows Key Guide for E&S Safeguards Officers, E&S Consultants, Supervisory Consultants, Contractors, etc.

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<sup>68</sup> technical feasibility is based on whether the proposed measures and actions can be implemented with commercially available skills, equipment, and materials, taking into consideration prevailing local factors such as climate, geography, demography, infrastructure, security, governance, capacity, and operational reliability

<sup>69</sup> Financial feasibility is based on relevant financial considerations, including relative magnitude of the incremental cost of adopting such measures and actions compared to the project's investment, operating, and maintenance costs,



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### **Key Guide for E&S Safeguards Officers, E&S Consultants, Supervisory Consultants, Contractors etc.**

The requirements of this ESS 8 will apply to all sub-projects/intervention works that are likely to have risks or impacts on cultural heritage. This will include intervention works which:

- Involve excavations, demolition, movement of earth, flooding, or other changes in the physical environment;
- Are located within a legally protected area or a legally defined buffer zone;
- Are located in, or in the vicinity of, a recognized cultural heritage site; or
- Are specifically designed to support the conservation, management, and use of cultural heritage

### 6.7.9 Borrow Pit Acquisition, Excavation, Reclamation and Management

Contractors shall prepare a Borrow Pit Management and Reclamation Plan as part of their implementation activities. This may be a stand-alone document or part of the CESMP. Generally, the following guidelines should be adopted for acquiring borrow pit:

- Conduct thorough site assessments to identify suitable locations for borrow pits that minimize environmental impacts and community disruption.
- Use scientifically based criteria to select suitable borrow pit sites, taking into account factors such as soil conditions, topography, vegetation, existing land use, proximity to construction sites, availability of desired materials, geological suitability, environmental sensitivity, and potential impacts on local communities.
- Identify and assess the potential impacts of borrow pit operations on local flora and fauna, including habitats, endangered species, and biodiversity hotspots. Implement measures to minimize habitat disturbance and protect sensitive ecosystems. Prioritize sites with minimal ecological sensitivity, avoiding areas with high biodiversity, protected habitats, or cultural significance.
- Ensure compliance with local, national, and international regulations governing land use, environmental protection, and community engagement and obtain all necessary permits and approvals from relevant regulatory authorities before commencing excavation activities.
- Conduct series of geotechnical tests such as particle size distribution analysis, soil classification tests, compaction tests, etc. to assess the suitability of the soil materials and to evaluate the engineering properties of the soil to ensure it meets the requirements for the rehabilitation activities.
- For existing borrow pits, implement erosion and sediment control measures, such as silt fences, sediment traps, and erosion control blankets, to prevent soil erosion and minimize sediment runoff into water bodies.
- Ensure early consultations with local communities and stakeholders to solicit their input, concerns, and consent regarding the acquisition and operation of the borrow pit. Respect local rights and traditional land use practices.
- Obtain a land lease agreement document with the owners of lands to be used as borrow pits as well as a Social License to Operate (SLO)
- Implement health and safety measures to protect workers and nearby communities from hazards associated with borrow pit operations, including exposure to dust, noise, and heavy machinery. Provide training and personal protective equipment (PPE) as necessary.
- Develop a borrow pit reclamation and management plan to restore borrow pit sites to a safe and environmentally sustainable condition once excavation activities are completed. This may involve backfilling, grading, landscaping, and revegetation to minimize visual impacts and promote ecosystem recovery.
- Develop closure plans to guide the decommissioning and restoration of borrow pit sites once excavation activities are completed.



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### 6.7.10 GBV Action Plan for RAAMP-SU – Key Considerations

In the implementation of Components A – D, impacts on gender; some of which could be beneficial or adverse are likely to occur. Furthermore, during the implementation of multiple sub-projects/interventions requiring major civil works across the states; the influx of labour into project communities may increase the risks of SEA/SH and likelihood of its occurrence in different forms. This expresses that from an E&S risks and impacts perspective, certain actions are required to ensure the identification, assessment, and addressal of GBV issues. On this background, it is imperative that SPIUs prepare a project-specific Gender-Based Violence Action Plan (GBV Action Plan) in line with Annex 6 which should reflect the considerations of the World Bank’s GPNs for Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing (IPF) involving Major Civil Works, alongside GIIPs for addressing SEA/SH in rural development projects. In an Integrative manner, the GBV Action Plan for the states should ensure that specific needs and priorities of both women and men are captured across the prospective states and the FCT so that they are addressed where feasible, practically, and sustainably.

#### 6.7.10.1 ESF Requirements on SEA/SH

The ESF’s ESSs set out the requirements for Borrowers relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the World Bank. While the ESF itself does not explicitly mention SEA/SH, various ESSs are in alignment with the recommendations of this GPN for addressing SEA/SH, including:

- ESS1: Assessment and Management of Environmental and Social Risks and Impacts;
- ESS2: Labor and Working Conditions;
- ESS4: Community Health and Safety; and
- ESS10: Stakeholder Engagement and Information Disclosure.

#### 6.7.10.2 RAAMP-SU GBV Action Plan Minimum Requirements

The following are the minimum requirements expected by the states in preparing their GBV-Action Plan. The GPNs explains that a GBV Action Plan is recommended for Moderate, Substantial and High-risk projects. Importantly, the activities to be outlined in the RAAMP-SU GBV Action Plan, will vary in accordance with the level of risk i.e., the higher the SEA/SH risks, the more the GBV Action Plan will need to address. See Table 24 for RAAMP-SU States’ GBV Action Plan Minimum Requirements.

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**Table 24: RAAMP-SU States' GBV Action Plan Minimum Requirements.**

<b>During Project Preparation</b> Project Planning, Design	<b>Gender Analysis</b>	It is important that the RAAMP-SU conducts a gender analysis early in the project. The gender analysis should be throughout the 36 RAAMP-SU states and the FCT, leveraging on stakeholder engagement, data gathering and site visits to communities; so as to understand the roles, needs, and priorities of women and men in the rural communities where the project shall be intervening. Such needs may cut across transportation, access to markets, healthcare, education and other services. The gender analysis will help in designing interventions that are responsive to gender dynamics.
	<b>Stakeholder Engagement (Application of the SEP)</b>	Early stakeholder Engagement, particularly at the community-level will ensure meaningful participation of women in particular and men in the planning, design of sub-projects/intervention works. This will create opportunities for women (especially) in the Northern states to voice their concerns, suggestions and preferences throughout the project cycle.
	<b>Capacity Building</b>	GBV SEA/SH awareness activities will be conducted in all the project implementation communities. GBV SEA/SH sensitization will also be provided for all RAAMP-SU project staffs, consultants, contractors and workers. When done early during project design, capacity building programs for women may enhance their skills and knowledge in areas such as road maintenance, rehabilitation/construction and project management. This will help empower women from project-benefiting communities to participate in RAAMP-SU interventions and activities, and benefit from opportunities they may bring. Project workers will also undergo a capacity building workshop on SEA/SH.
	<b>Assessment of Project SEA/SH Risks</b>	<p>RAAMP-SU will assess the SEA/SH risks of its proposed interventions and identify and implement prevention and mitigation measures to address the risks. Based on the GPNs, there are two considerations for the assessment of the projected related SEA/SH risks. These include:</p> <ul style="list-style-type: none"> <li>• <b>Project-related SEA/SH Risk Assessment:</b> RAAMP-SU will conduct and assessment of the risk of exacerbation/ introduction of SEA or SH at the Community level; and</li> <li>• <b>Capacity Assessment:</b> assessment of the local capacity of formal systems to prevent and respond to GBV, including SEA/SH, and the availability of safe and ethical service provision for survivors, especially children</li> </ul> <p>The assessment of SEA/SH risks has to be undertaken by the RAAMP-SU and assisted by the World Bank Task Team through its due diligence.</p> <p><b>N/B</b> For the RAAMP-SU FPMU, the assessment of SEA/SH risks be undertaken as part of project preparation, particularly during community consultations. For the Bank's Task Team, the SEA/SH risks screening shall be done using the World Bank's SEA/SH Risk Assessment Tool.</p> <p>Additionally, the assessment should ascertain the "areas of impact" which broadly are the I) <b>Project sites/locations</b> - This includes both the actual locations where civil works will be conducted, and also the associated areas such as the locations of workers' camps, etc. ii) The area of impact beyond the project site includes <b>communities adjoining the project</b>. This extends beyond the specific location where civil works are being carried out. These communities are at risk of SEA/SH, particularly when workers are highly mobile; and iii) There are also <b>regional and national areas of impact</b> that will not be affected by the specific interventions of a project but may benefit through institutional strengthening and other efforts to address SEA/SH risks.</p>
<b>Throughout the Project</b> Project Planning, Design	<b>Addressing SEA/SH Risks</b>	To address SEA/SH risks, the action plan will incorporate a mapping of GBV services/service providers. Each RAAMP-SU State and the FCT shall conduct its GBV mapping to capture GBV prevention and response actors across the project locations. The mapping shall incorporate an assessment of the capabilities of the service

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		<p>providers to provide quality survivor-centered services, including GBV case management, acting as a victim advocate, and in providing referral services to link to other services.</p> <p>Development of a GBV Action Plan including an Accountability and Response Framework as part of the E&amp;S assessment, these requirements will be required to be reflected in the CESMP. States should include GBV mitigations and Labour Influx Management Plan.</p> <p>RAAMP-SU SPIU Procurement Officers are to ensure SEA/SH requirements and expectations in the bid documents are clearly defined in the Contractor's bidding documents.</p> <p>SPIUs shall evaluate the Contractor's SEA/SH Accountability Framework in the CESMP (See Table 26 below)</p> <p>Processes should be put in place for Contractors and all project workers to understand and sign the Code of Conduct including penalties for non-compliance.</p> <p><b>Addressing SEA/SH risks through the Procurement Process</b>          Embedding SEA/SH requirements in procurement processes is a critical mechanism to ensure legal accountability for addressing SEA/SH in projects. Recent revisions to World Bank procurement requirements have strengthened measures to address SEA/SH risks in World Bank-financed operations. Standard Bidding Documents (SBDs), which the Borrower agrees to apply for international competitive procurement, provide the basis for ensuring that contractors and consultants fulfil their GBV obligations. The requirements to comply are enshrined in the covenants of the Financing Agreement.</p>
	<p>Responding to SEA/SH Cases</p>	<ul style="list-style-type: none"> <li>• Identifying GBV Service Providers: All projects are recommended to identify GBV services provider(s), including those with expertise to provide services to child survivors</li> <li>• SPIUs should have a framework for properly handling SEA/SH complaints</li> <li>• The GBV Action plan shall also provide procedures for Resolving and Closing a Case based on the GPNs</li> <li>• For the purpose of SEA/SH, there shall be a dedicated GBV- GRM, which shall be implemented in the RAAMP-SU states. The GRM will have easy access and a functional referral pathway in order to collate complaints related to SEA/SH and refer survivors.</li> <li>• GBV Officers shall undertake regular M&amp;E of progress on GBV activities, including reassessment of risks, mitigation measures, grievance uptake procedure as appropriate.</li> <li>• The FPMU and SPIUs are to have GBV Specialists and GBV officer who will be responsible for guiding all aspects of GBV under the project. Similarly, Supervisory Consultants and Contractor are recommended to have GBV Focal persons as part of their workforce. GBV focal persons at the community level will also be identified to support the implementation of the GBV-GRM.</li> <li>• As part of RAAMP GBV Response, there will be GBV Intermediary service providers at the state level who are expected to receive GBV complaints and cases and refer them to the appropriate service providers based on the needs of the survivor.</li> </ul>

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### 6.7.10.3 Accountability and Response (A & R) Framework for RAAMP-SU

The Accountability and Response Framework outlines the procedures for handling incidents, should they occur, including investigation protocols, timelines, and potential disciplinary actions for breaches of the Code of Conduct by workers. Contractors are contractually obligated to ensure that workers adhere to the Code of Conduct and implement disciplinary measures. The Draft Accountability and Response Framework, which includes an SEA/SH Action Plan, will be finalized in collaboration with the contractor and incorporated into the Contractors-Environmental and Social Management Plan (C-ESMP). This framework also includes procedures for internally reporting SEA/SH allegations to ensure accountability, a referral pathway for directing survivors to appropriate support services, and guidelines for maintaining confidentiality when handling cases. Table 25 below. Shows the accountability and response framework for RAAMP-SU.

**Table 25: Accountability and Response Framework for RAAMP-SU**

Function	GRC	Intermediary service provider	Other GBV Service Providers	Works Contractor	Supervising Engineer	PIU Staff	SEA/SH Committee	Third Party Monitor
Receive grievances	✓	✓						
Document and register grievances	✓	✓						
Inform survivors about legal and internal data-sharing obligations	✓	✓						
Notify GM operators World Bank in accordance with the required reporting protocols						✓		✓
Refer survivors to relevant GBV service providers	✓	✓						
Provide support services to survivors	✓	✓	✓					
Review grievances and determine the likelihood that they are project-related							✓	
Recommend sanctions for perpetrator in accordance with employment contract and local law and follow up on the recommendations				✓	✓	✓		
Report action taken to project-level GRM so that the case can be closed	✓	✓						
Monitor, track, and provide regular reports to the implementing agency	✓	✓					✓	✓
Respond to survivors	✓	✓	✓					

See GBV Action Plan for Full Details (Annex 6)

## 6.8 COVID-19 Health and Safety of the Workforce

Under RAAMP-SU, workplaces could be high-risk environments for COVID-19 outbreaks and subsequent community transmission. Identifying, understanding, and implementing effective workplace COVID-19 Infection Prevention and Control (IPC) measures is critical to protect the RAAMP-SU workforce. Implementing COVID-19 measures for the workforce would involve a comprehensive approach to ensure that safety and well-being of all worker types under the RAAMP-SU while maintaining project operations. The RAAMP-SU FPMU/SPIUs should identify measures to address COVID-19. A systematic approach to planning and recognizing the challenges associated with rapidly changing circumstances in the event of a sudden COVID-19 incident, will help the project put in place the best measures possible to address the situation. SPIUs should refer to guidance issued by relevant

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authorities – Nigeria Center for Disease Control (NCDC), Federal Ministry of Health (FMOH), State Ministries of Health (SMoHs) and the World Health Organization (WHO). Some key measures to be undertaken will include:

- **Working Remotely:** The project should encourage working remotely whenever possible. Provide necessary tools and resources for employees to work effectively from home.
- **Social Distancing:** In cases where working remotely is not feasible, the FPMU and SPIUs should implement social distancing measures in the workplace. This may include rearranging workstations, staggering shifts, and limiting the number of employees in common areas.
- **Hygiene Practices:** Promote regular handwashing with soap and water. Provide hand sanitizers in common areas and encourage their use. Ensure proper sanitation of frequently touched surfaces such as doorknobs, workstations, shared equipment and materials.
- **Personal Protective Equipment (PPE):** The project should provide appropriate PPEs such as masks, gloves, and face shields, especially in situations where social distancing is challenging or not possible. Similarly, the Contractors should procure PPEs for their staff and workers.
- **Health Screenings:** In the case of a reported incidence/outbreak, the project shall implement health screenings such as temperature checks and symptom assessments before employees enter the workplace. Workers should be encouraged to stay home if they feel unwell or exhibit any COVID-19 symptoms. Health screenings should be a sustainable practice and not limited to only COVID-19.
- **Communication and Training:** Communication Specialists in the FPMU and SPIUs shall maintain effective simple and accessible channels on information on COVID-19 safety protocols and other directives.
- **Vaccination Support:** The project should encourage vaccination by providing information about vaccine availability, benefits, and safety. Consider offering vaccination clinics or providing paid time off for employees to receive the vaccine.
- **Monitoring and Adaptation:** Continuously monitor the effectiveness of COVID-19 measures and adapt policies as needed based on changing circumstances, local regulations, and public health guidance.

### 6.9 Consultation and Participation Plan (ESS10)

The SEP prepared for the RAAMP-SU in line with ESS 10 already provides consultation participation strategy to be adopted during project implementation. Accordingly, the FPMU and SPIUs shall adopt the strategy in the SEP for all stakeholder engagements processes under the project.

### 6.10 Guideline for preparation of Environmental and Social Monitoring Plan

The ESMP (either contained in the ESMP instrument or ESIA instrument) should also outline environmental and social monitoring procedures that shall be implemented during the execution and operation of the sub-projects/intervention works in order to determine the implementation success of the mitigation and monitoring measures and improve the E&S performance of the subprojects/intervention works. The ESMP should include monitoring objectives that specify the type of monitoring activities that will be linked to the mitigation measures, costs and responsible persons/institutions for monitoring. Specifically, the monitoring section of the ESMP should provide:

- A specific description and technical details of monitoring measures that include the
  - ✓ **parameters to be measured,**
  - ✓ **methods of measurement,**
  - ✓ **sampling locations,**
  - ✓ **frequency of monitoring,**
  - ✓ **performance indicators,**
  - ✓ **detection limits (where appropriate), and**
  - ✓ **definition of thresholds that will signal the need for corrective actions.**

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Monitoring and reporting procedures should aid in ensuring the early detection of conditions that necessitate particular mitigation measures and to furnish information on the progress and results of mitigation.

### 6.11 Monitoring Program

The main purpose of this monitoring program is to ensure that the various tasks detailed in the ESMP particularly the mitigation measures are implemented in an effective manner, and to evaluate program impacts on the key environmental and social parameters. RAAMP-SU will adopt the process of a) compliance monitoring and b) effects monitoring. See details below:

**Compliance Monitoring:** The purpose of the compliance monitoring is to ensure that Contractors implement the mitigation measures provided and captured in the respective ESMPs are effectively and timely implemented (either contained in the stand-alone ESMP or ESIA instrument). This monitoring will generally be carried out by responsible parties who by mandate of their corporate functions are required to check E&S compliance of project activities. Particularly for RAAMP-SU, such responsibility will broadly fall to the RAAMP-SU FPMU/SPIUs, Supervisory Consultants, SEPAs/SWMAs, CSOs/NGOs and other interested parties such as MDAs which may be identified during stakeholder engagement for the preparation of the E&S assessment (ESMP/ESIA).

**Effects Monitoring During Project Implementation:** Monitoring the effects of mitigation and monitoring measures during implementation of the ESMP is crucial for ensuring that SPIUs stay on track in meeting the objectives of the site-specific ESMP, and as well as deliver on the anticipated beneficial E&S outcomes/impacts of the sub-projects/intervention works. Key steps to be carried out by SPIUs in order to monitor effects of ESMP implementation shall include; a) establishing clear objectives and indicators, b) conducting baseline assessments so that changes to air quality, noise, water quality, etc. can be monitored and checked during sub-projects/intervention works implementation, c) collecting data systematically (i.e. number of grievances), d) analyzing and reporting findings regularly, e) soliciting feedback from PAPs and interested parties, f) practicing adaptive management, g) managing sub-projects risks and impacts (security risks, climate vulnerability, timeline for delivery of sub-projects by Contractors, Force Majeure, change in government policy, SEA/SH, etc.), h) fostering a culture of learning, and i) conducting periodic evaluations.

**Monitoring Parameters:** The monitoring parameters shall include the following (however not limited)

- **Parameters to be measured:**
  - ✓ Incidence of respiratory symptoms reported by workers and site personnel
  - ✓ Use of PPES; nose masks, earmuffs
  - ✓ Level of project acceptance amongst PAPs
  - ✓ Frequency and nature of recorded grievances
- **Methods of measurement**
  - ✓ Surveys and Interviews
  - ✓ Checks and Verifications
  - ✓ Review of grievance logbook
  - ✓ Visual observation
- **Sampling locations**
  - ✓ Construction site and nearby communities
  - ✓ Camp Office
  - ✓ Equipment staging areas
  - ✓ Drainage terminal
- **Frequency of monitoring,**
  - ✓ Weekly
  - ✓ Bi-Weekly
  - ✓ Monthly
  - ✓ Quarterly



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- **Performance indicators**
  - ✓ Air quality parameters are within FMENV/NESREA/WHO permissible limits.
  - ✓ Contractors' compliance to mitigation measures
  - ✓ Effectiveness of erosion control measures in minimizing sediment runoff and erosion
  - ✓ Zero or reduced number of incidents and accident cases
- **Definition of thresholds that will signal the need for corrective actions**
  - ✓ Limits on pollution levels
  - ✓ Community grievances
  - ✓ Worker safety incidents
  - ✓ Biodiversity loss.

### 6.12 ESMP Implementation Cost

Estimated cost will be prepared for all the mitigation and monitoring measures to be proposed in the site-specific ESMPs. The cost estimates for some of the mitigation measures to be identified in the ESMP will be part of the civil works contracts to be issued to prospective Contractors. Some mitigation measures (mapping for GBV services and preparation of site-specific GBV Action Plans, training, RAP implementation etc) will also be implemented by experts and shall also be costed (if required).

#### 6.12.1 ESMP Matrix Table

Conventionally, the ESMP Matrix table is designed to address the activities, adverse E&S risks and impacts, mitigation measures and responsible parties/institutions according to the phases of the project (pre-rehabilitation/pre-construction, rehabilitation/construction, and operation phases). The mitigation measures and other relevant details in the ESMP included as a stand-alone ESMP report or part of the ESIA report, may be best presented in such a matrix table presentation. The matrix table amongst other inclusions should to a minimum present and describe the following:

- **Proposed Sub-projects/Intervention Works and their Activities:** The ESMP shall include the type of intervention works and the activities resulting in potential adverse environmental and social risks and impacts. This provides clarity on the causes of such E&S risks and impacts.
- **Environmental and Social Components or Receptors:** This describes the environmental and social components, receptors or sensitivity receiving the adverse impact of the activities as a result of implementing proposed sub-projects/intervention works e.g., Air, Surface Water, Soil, etc.
- **Environmental and Social Risks and Impacts:** This should outline all the potential adverse environmental and social risks and impacts that are associated with the sub-projects/intervention works throughout the phases of the intervention (pre-rehabilitation/pre-construction, rehabilitation/construction and operation phases).
- **Mitigation:** Based on the environmental and social risks and impacts identified in the prepared ESMPs/ESIA, the ESMP matrix table should describe with technical details the mitigation measures, (applied according to the mitigation hierarchy) as appropriate.
- **Monitoring:** The ESMP should also outline environmental and social monitoring procedures as described in section 6.11.
- **Responsible Parties/Institutions:** The ESMP should also provide a specific description of responsible parties/institutions, (i.e., who is responsible for implementing the mitigation measures and carrying out the monitoring regime for operations, supervision, enforcement, financing, reporting and capacity building). Additionally, the ESMP should include an estimate of the costs of the measures and activities recommended so that the SPIUs can budget the necessary funds. Similar to the process for carrying out

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the ESIA, the mitigation and monitoring measures recommended in the ESMP should be developed in consultation with all the affected groups to include their concerns and views in the sub-project/intervention works design. Ultimately, mitigation measures assigned to the prospective Contractors should be included in the bidding documents alongside the cost allocation for implementing the mitigation measures. These will also form clauses in the contract agreement between the RAAMP-SU SPIUs and their respective Contractors assigned to undertake civil works.

See Table 26 for ESMP Matrix Table

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**Table 26: Mitigation and Monitoring Plan**

**ESMP – PRE-REHABILITATION/PRE-CONSTRUCTION PHASE**

S/N	Activity	Potential Impacts	Mitigation Measures	Responsibility For Mitigation	Cost of Mitigation	Parameters to be Measured	Method of Measurement	Performance Indicator	Sampling Location	Frequency of Monitoring	Responsibility for Monitoring	Cost of Monitoring
<b>A. ENVIRONMENTAL IMPACTS</b>												
1.	<b>Site clearing</b> <b>Siting of staging areas and workers campsites</b> <b>Mobilization of Equipment to site</b> <b>Relocation of structures within the ROW</b>	The release of fugitive dusts during site clearing, siting of workers campsites and construction dust during offload of construction materials	Mitigation should be targeted at dampening or watering the road surface using water trucks or sprinkler systems,  Distributing PPEs such as nose masks or respirators to workers/ PAPs  Maintain a speed limit of 40km/hr. on earth-based roads (dirt roads).	Contractor	<b>To Be Determined (TBD) in the E&amp;S instruments to be prepared by the SPIUs</b>	Watering and distribution of PPEs schedule	Inspection	Reduction of fugitive and construction dust	Along transportation corridors	Weekly	RAAMP-SU SPIUs (Safeguards Specialists); SMEEnvs; Supervisory Consultant	<b>To Be Determined (TBD) in the E&amp;S instruments to be prepared by the SPIUs</b>
2.	<b>Mobilization of Equipment to site</b>	Carbon emissions from exhaust fumes of vehicles during mobilization/transportation of equipment to project locations	Measures should be targeted at ensuring that vehicles are serviced;  Undergo Vehicle Emission Testing (VET) And Vehicle Exhaust Screening (VES).	Contractors	<b>TBD</b>	Carbon emissions from exhaust fumes of vehicles	Inspection	Reduction of carbon emissions from exhaust fumes of vehicles	Along transportation corridors	Weekly	RAAMP-SU SPIUs (Safeguards Specialists); SMEEnvs; Supervisory Consultant	<b>TBD</b>
3.	<b>Mobilization of workers, equipment and other materials into work areas</b>	Localized loss of topsoil due to stacking of heavy-duty equipment  Leakages from stacked equipment and	Measures should include limiting zone of vehicle and equipment weight impacts (designate an	Contractors	<b>TBD</b>	Area designated for parking and stacking equipment	Inspection	No/reduced loss of topsoil	Equipment storage areas	One-Off	RAAMP-SU SPIUs (Safeguards Specialists);	<b>TBD</b>

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S/N	Activity	Potential Impacts	Mitigation Measures	Responsibility For Mitigation	Cost of Mitigation	Parameters to be Measured	Method of Measurement	Performance Indicator	Sampling Location	Frequency of Monitoring	Responsibility for Monitoring	Cost of Monitoring
	<b>Siting of staging areas</b>	subsequent intrusion of oil and chemical substances into soil.	<p>area for parking and stacking equipment);</p> <p>Installation of impermeable surface at the limit zone to contain potential leakages.</p> <p>Liaise with the appropriate waste management agency for the proper evacuation and disposal of hazardous waste materials.</p> <p>Use of drip pans.</p> <p>Management of maintenance workshops or onsite maintenance.</p>					Reduction in leakages from stacked equipment			Supervisory Consultant	
4.	<p><b>Site clearing</b></p> <p><b>Relocation of structures within the ROW</b></p> <p><b>Removal of topsoil/dilapidated asphalt from roads</b></p>	Site clearing and removal of structures within the ROW activities may lead to the generation of brush piles and vegetative debris (e.g., grass clippings, leaves, brush pruning, tree limbs and stumps) and Construction and Demolition Wastes (CD-Wastes).	<p>Measures should be targeted at preparation of a WMP (See Annex 17)</p> <p>Engage the services of waste disposal and management agency to evacuate waste</p>	<p>Contractors</p> <p>State Waste Management Agencies (SWMAs)</p>	TBD	Stockpiles of vegetative debris, CD-Waste, and removed top soil/earth material within the ROW.	Inspection	<p>Compliance to preparation of a WMP.</p> <p>Letter of Engagement/Agreement</p>	Within the ROW	Weekly	<p>RAAMP-SU SPIUs (Safeguards Specialists);</p> <p>Supervisory Consultant</p>	TBD

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S/N	Activity	Potential Impacts	Mitigation Measures	Responsibility For Mitigation	Cost of Mitigation	Parameters to be Measured	Method of Measurement	Performance Indicator	Sampling Location	Frequency of Monitoring	Responsibility for Monitoring	Cost of Monitoring
		Additionally, the removal of top soil/dilapidated asphalt from roads in preparation for the intervention works may also generate heaps of removed top soil/earth material.										
5.	Same as A1 above	Noise impacts during siting staging areas and workers campsite, relocation of structures within the ROW, and operation of project vehicles	<p>Early notification of community members on work schedule.</p> <p>Measures should be targeted at retrofitting vehicle exhausts with sound-control or sound-proofing devices and providing PPEs, specifically ear muffs to workers during siting of staging areas and workers campsites, relocation of structures within the ROW, operation of project vehicles</p> <p>As much as possible, avoid work during late evenings or night hours (between</p>	Contractors	TBD	<p>Vehicle retrofitting</p> <p>Provision of ear muffs to workers</p>	<p>Checks &amp; Validation</p> <p>Inspection</p>	Contractor's compliance	Along project corridor	During siting of staging areas and workers campsite, relocation of structures within the ROW, and operation of project vehicles	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD

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S/N	Activity	Potential Impacts	Mitigation Measures	Responsibility For Mitigation	Cost of Mitigation	Parameters to be Measured	Method of Measurement	Performance Indicator	Sampling Location	Frequency of Monitoring	Responsibility for Monitoring	Cost of Monitoring
			6:00pm to 6:00am).									
					TBD							TBD
<b>B. SOCIAL RISKS AND IMPACTS</b>												
1.	<b>Site clearing</b> <b>Siting of staging areas and workers campsites</b> <b>Mobilization of Equipment to site</b> <b>Relocation of structures within the ROW</b>	Noise disturbances during pre-rehabilitation activities	<p>Early notification of community members on work schedule.</p> <p>Measures should be targeted at retrofitting vehicle exhausts with sound-control or sound -proofing devices. Provide PPEs, specifically ear muffs.</p> <p>As much as possible, avoid work during late evenings or night hours (between 6:00pm to 6:00am).</p>	Contractors	TBD	Noise levels	Noise level measurement	Noise levels are within National Environmental (Noise Standard and Control (55dB)	Offload sites	During Pre-rehabilitation phase	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD
2.	<b>Same as B1</b>	<p>Grievances from community locals as a result of relocation of structures within the ROW</p> <p>Negative impact on host community dynamics as an outcome from labour influx</p>	<p>Implement a RAP or an ARAP as the case may be</p> <p>Ensure early and continuous stakeholders' engagement</p>	Contractors,	TBD	<p>Implementation of RAP</p> <p>Stakeholders Engagement</p> <p>Preparation of a project level GRM</p>	<p>Checks and Validation</p> <p>Inspection</p>	Compliance to mitigation measures	Project corridor	During pre-rehabilitation phase	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD



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S/N	Activity	Potential Impacts	Mitigation Measures	Responsibility For Mitigation	Cost of Mitigation	Parameters to be Measured	Method of Measurement	Performance Indicator	Sampling Location	Frequency of Monitoring	Responsibility for Monitoring	Cost of Monitoring
		Impact on existing infrastructures which may be accidentally damaged or destroyed during the movement of heavy-duty vehicles and equipment  Intrusion into farmlands and possibly sacred sites  Grievances, conflicts, poor perception of the project and reduced stakeholders' satisfaction	A project Level Grievance Redress Mechanism (GRM) should be prepared to address grievances. Specially, the environmental and social assessment report for sub-project should contain a chapter on Grievance Redress at the sub-project level.  Ensure inclusion of host communities in decision making and project benefits			Inclusion of host communities in project benefits	One-on-one interviews					
3.	Same as B1	Possible conflicts of interest between Contractors, RAAMP-SU SPIUs and interest groups in the community who might like to provide unskilled labour services to the Contractors  Possible conflicts between farmers and contractor workers	A project level GRM should be prepared to address grievances. Specially, the environmental and social assessment report for sub-projects/intervention works should contain a chapter on Grievance Redress at the	Contractor  RAAMP-SU SPIUs (Safeguards Unit)	TBD	Number of conflicts of interest  Number of locals in Contractor's workforce	Visual Observation  Inspection of recruitment records	Contractor's Compliance	Project Corridors	Monthly	FPMU  RAAMP-SU SPIUs (Safeguards Specialists);  Supervisory Consultant	TBD

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S/N	Activity	Potential Impacts	Mitigation Measures	Responsibility For Mitigation	Cost of Mitigation	Parameters to be Measured	Method of Measurement	Performance Indicator	Sampling Location	Frequency of Monitoring	Responsibility for Monitoring	Cost of Monitoring
4.	Same as B1	Traffic impacts may occur when heavy duty vehicles are conveying equipment to and from project sites, along main town/city routes.	Prepare TMP (See Annex 15)  Liaise with road traffic control agencies e.g., FRSC	Contractor	TBD	Preparation of TMP	Inspection	Frequency of traffic impacts	Along main town/city routes	During transport of construction materials	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD
5.	Same as B1	Incidents and/or accidents may occur during transportation of materials to project site.	Prepare TMP (See Annex 15)	Contractor	TBD	Preparation of TMP	Visual Observation	Zero accidents	Project corridors	During operation of work vehicles	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD
6.	Same as B2	Displacement or relocation of persons (Mainly owners of structures and farmlands within the ROW.	The RAAMP-SU should see to the implementation of a RAP or an ARAP	RAAMP-SU SPIUs (Safeguards Unit)	TBD	Implementation of RAP or ARAP	Checks and Verifications	Zero grievance from loss of farmlands or structures	Project Corridor	One-Off	FPMU  RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD
<b>Sub-total cost</b>					<b>TBD</b>							<b>TBD</b>
<b>C.</b>	<b>OCCUPATIONAL HEALTH AND SAFETY RISKS AND IMPACTS</b>											
1.	<b>Mobilization of Equipment to site</b>	Air pollution from exhaust fumes of vehicles and equipment moving into work areas may occur. This may pose an occupational health risk (respiratory infections and diseases), especially for people living in and carrying out activities around the proposed intervention work corridors, as well as	Preparation of an Occupational Health and Safety Management Plan (OHSMP) to guide management of OHS risks (See Annex 14). The OHSMP may focus on use of nose masks and ear muffs	Contractor	TBD	Compliance with OHSMP	Visual Observation  Interviews	Compliance to mitigation measures proffered in OHSMP;	Project Corridor	Weekly	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD

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S/N	Activity	Potential Impacts	Mitigation Measures	Responsibility For Mitigation	Cost of Mitigation	Parameters to be Measured	Method of Measurement	Performance Indicator	Sampling Location	Frequency of Monitoring	Responsibility for Monitoring	Cost of Monitoring
		contractor personnel conveying equipment to the project locations										
2.	Same as C1	Exposure of workers to increased noise pollution during movement of equipment to work areas and offloading of construction materials		Contractor	TBD							TBD
Sub-Total					TBD							TBD
Total					TBD							TBD

### ESMP – REHABILITATION/CONSTRUCTION PHASE

S/N	Activity	Potential Impacts	Mitigation Measures	Responsibility For Mitigation	Cost of Mitigation	Parameters to be Measured	Method of Measurement	Performance Indicator	Sampling Location	Frequency of Monitoring	Responsibility for Monitoring	Cost of Monitoring
D.	ENVIRONMENTAL IMPACTS											

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S/N	Activity	Potential Impacts	Mitigation Measures	Responsibility For Mitigation	Cost of Mitigation	Parameters to be Measured	Method of Measurement	Performance Indicator	Sampling Location	Frequency of Monitoring	Responsibility for Monitoring	Cost of Monitoring
1.	<b>Civil Works</b>  <b>Operation of Work Vehicles</b>	Air Pollution from fugitive dusts and carbon emissions from exhaust fumes as during civil works and operation of work vehicles and equipment, respectively	Measures should be targeted at dampening or watering the road surface using water trucks or sprinkler systems, distributing PPEs such as nose masks or respirators to workers/PAPs, and reducing emissions by retrofitting with emission controls for vehicles and ensuring that vehicles are serviced regularly  Maintain a speed limit of 40km/hr. on earth-based roads (dirt roads).	Contractor	TBD	Air Quality	Inspection	Reduction in fugitive dusts	Project Corridor	Monthly	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD
2.	<b>Operation of Work Vehicles</b>	Soil Pollution: Leakages from construction wastes such as disused oil (fuel, lubricants), cement, and paint may occur	Measures should be targeted at storing of hazardous materials such as oil, fuel, lubricants, cement, and paint in designated containers or areas with impermeable floors and to prevent leaks and spills.  Liaise with the appropriate waste management agency for the proper evacuation and disposal of hazardous waste materials. Use of drip pans.	Contractor	TBD	Leakages from construction wastes	Inspection	Contractor's Compliance	Project Corridor	Weekly	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD

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S/N	Activity	Potential Impacts	Mitigation Measures	Responsibility For Mitigation	Cost of Mitigation	Parameters to be Measured	Method of Measurement	Performance Indicator	Sampling Location	Frequency of Monitoring	Responsibility for Monitoring	Cost of Monitoring
			Management of maintenance workshops or onsite maintenance.									
3.	Same as D1	Noise level increases during operation of work vehicles and equipment	<p>Early notification of community members on work schedule.</p> <p>Provide PAPs with PPEs such as earplugs or earmuffs and implement noise control measures during construction, such as mufflers or silencers on machinery.</p> <p>As much as possible, avoid work during late evenings or night hours (between 6:00pm to 6:00am).</p>	Contractor	TBD	Use of PPEs and Implementation of noise control measures	Inspection	Contractor's Compliance	Project Corridor	As when required	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD
4.	Same as D1	Energy wastage due to inefficient or unnecessary consumption of energy resources e.g., diesel, electricity	Measures should be targeted at ensuring resource efficiency and alternating operations to reduce energy losses	Contractor	TBD	Resource efficiency	Inspection	Contractor's Compliance	Project Corridor	As when required	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD
5.	Civil Works	Significant amounts of wastes will be generated onsite. These wastes may include debris, top soil, disused materials and containers, food wastes etc.	Measures should be embedded in sub-project level WMPs. Measures should focus on source reduction, sorting, collection, reusing, recycling, transporting, containment, treatment final disposal etc.	Contractor	TBD	Waste management	Inspection	Compliance to preparation of a WMP.	Project Corridor	Weekly	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD

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S/N	Activity	Potential Impacts	Mitigation Measures	Responsibility For Mitigation	Cost of Mitigation	Parameters to be Measured	Method of Measurement	Performance Indicator	Sampling Location	Frequency of Monitoring	Responsibility for Monitoring	Cost of Monitoring
6.	Same as D1	<p>Possible pollution of surface water via oil/lubricant spills from machinery, batteries acid etc.</p> <p>Construction of river crossings may result in sediment runoffs in nearby streams/ivers</p>	Measures should be targeted at implementing spill prevention and containment	Contractor	TBD	Pollution of surface water and runoffs into nearby streams	Inspection	Contractor's compliance	Project Corridor	One-Off	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD
7.	Same as D1	Possible disruption of local habitats and wildlife during excavation	<p>Mitigation measures was targeted at conducting thorough habitat surveys prior to excavation activities to identify sensitive areas and wildlife habitats.</p> <p>Establish buffer zones around sensitive habitats to prevent direct disturbance. Furthermore, these zones should be marked clearly to restrict access to them during road rehabilitation.</p> <p>For excavations around borrow pits, ensure that all open pits are reclaimed to the normal topography of the land, the reclamation should be followed by reforestation/ replanting with native vegetation.</p>	Contractor	TBD	Disruption of local habitats	Inspection	Contractor Compliance	Project Corridor	Weekly	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD



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S/N	Activity	Potential Impacts	Mitigation Measures	Responsibility For Mitigation	Cost of Mitigation	Parameters to be Measured	Method of Measurement	Performance Indicator	Sampling Location	Frequency of Monitoring	Responsibility for Monitoring	Cost of Monitoring
Sub-total					TBD							TBD
<b>E. SOCIAL RISKS AND IMPACTS</b>												
1.	<b>Civil Works</b>  <b>Operation of Work Vehicles</b>	Residents of communities may experience unusual noise specifically, from civil works and use of heavy machineries.	Mitigation measures should be targeted at utilizing scheduling movement options to reduce or minimize the impacts of noise disturbances around residential areas/locations.	Contractor	TBD	No of complaints	Noise Measurement	Noise levels are within permissible limits	Project Corridor	As when required	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD
2.	<b>Same as E1</b>	Grievances from community locals as a result of relocation of structures within the ROW Negative impact on host community dynamics as an outcome from labour influx  Impact on existing infrastructures which may be accidentally damaged or destroyed during the movement of heavy-duty vehicles and equipment  Other causes of Grievances may include: Obstruction to certain access points during civil works  SEA/SH (GBV)  Child labour	Implement GRM at the level of the sub-project  Early and continuous Stakeholder Engagement is mandatory	Contractor	TBD	GRM processes	Interviews	Zero grievances	Project Corridor	Weekly	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD

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S/N	Activity	Potential Impacts	Mitigation Measures	Responsibility For Mitigation	Cost of Mitigation	Parameters to be Measured	Method of Measurement	Performance Indicator	Sampling Location	Frequency of Monitoring	Responsibility for Monitoring	Cost of Monitoring
3.	<b>Civil Works</b>	Grievances may ensue as a result of relocation/intrusion of/into sacred sites, reserved areas or locations of significant cultural history along the project locations.	Implement Physical Cultural Resources Management Plan and or a Chance Find Procedure	Contractor	TBD	PCR processes	Interviews  Visual Observation	Contractor Compliance	Project Corridor	Weekly	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD
4.	<b>Same as E3</b>	Conflicts of interests may arise during decision making at the program implementation level; between Contractual workers and general labour, etc. .	Implement GRM at the level of the sub-project.  Implement mitigation measures in the C-ESMP.  Stakeholder Engagement, Sensitization and capacity building.  Enforce CoC;	RAAMP-SU SPIU (safeguards unit)	TBD	Compliance to all requirements and procedures	Report reviews  Inspections  One-on-One interviews etc.	Effectiveness of instruments and procedures	Project Corridor	Weekly	FPMU  RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD
5.	<b>Same as E3</b>	Increased risk of illicit behaviour and crime (such as theft, physical assaults and substance abuse) attributable to labour influx. Additionally, there may be increase in unprotected sexual intercourse due to labour influx.	Implement LMP  Awareness and training and  Enforcement of the CoC cadres	Contractor	TBD	Compliance to all requirements and procedures	Report reviews  Inspections  One-on-One interviews etc.	Effectiveness of instruments and procedures	Project Corridor	Weekly	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD
6.	<b>Same as E1</b>	Labour Influx: Risk of social conflicts  Risk of illicit behaviour and practices	Implement Labour Management Plan, LMP; training and enforcement of the CoC cadres.	Contractors	TBD	Contractors Compliance	Inspections, observations	Better and safer working conditions	Project Corridor	Bi-Monthly	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD

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S/N	Activity	Potential Impacts	Mitigation Measures	Responsibility For Mitigation	Cost of Mitigation	Parameters to be Measured	Method of Measurement	Performance Indicator	Sampling Location	Frequency of Monitoring	Responsibility for Monitoring	Cost of Monitoring
7.	Same as E1	Contracted workers such as Contractors may be exposed to security threats such as vandalization and destruction of their assets and possibly kidnapping	Conduct SRA prior to commencement of civil works and implement SMP (See Annex 4) during the project life cycle.  Contractors should include their own security measures and plans in the CESMP	Contractors	TBD	Conduct of SRA	Inspections, observations	Better and safer working conditions	Project Corridor	Bi-Monthly	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD
8.	Same as E1	GBV: Women and girls may be exposed to SH/SEA as a result of interactions with workers and possibly followers.	GBV risk assessment and mapping of GBV services; Align with Program GBV mitigation Plan  Sensitization campaigns and awareness	RAAMP-SU (Safeguards Unit) Independent Consultant CSOs	TBD	Frequency of sensitization programs	Reports	No. of trained/sensitized persons	Project Areas	Bi-Monthly	FPMU RAAMP-SU SPIUs Supervisory Consultant	TBD
9.	Same as E1	VAC: Children may be exposed to various forms of violence from workers.	Enforcement of all Cadres of CoCs (See Annex 12) etc.	RAAMP-SU SPIUs (Safeguards Specialists);	TBD	Unacceptable Workforce behaviours	Reports, inspections	Compliance to CoC enforcement	Project Areas	Bi-Monthly	FPMU RAAMP-SU SPIUs Supervisory Consultant	TBD
10.	Same as E3	Unreclaimed and abandoned borrow pits may pose safety risks for children and other persons in communities.  Likely accidents while pedestrians are crossing access roads.	Community Health and Safety Plan (See Annex 10)  Preparation of Borrow Pit Management and Reclamation Plan (See Annex 16)  Preparation of TMP (See Annex 15)	Contractor	TBD	Reclamation of borrow pits  Unacceptable Workforce behaviours; unsafe works and hazardous conditions	Reports and inspections; audits	Contractor Compliance	Project Areas	Bi-Monthly	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD

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S/N	Activity	Potential Impacts	Mitigation Measures	Responsibility For Mitigation	Cost of Mitigation	Parameters to be Measured	Method of Measurement	Performance Indicator	Sampling Location	Frequency of Monitoring	Responsibility for Monitoring	Cost of Monitoring
11.	Same as E1	Communities already exposed to security risks and threats may experience heightened security threats due to ongoing intervention works. E.g., kidnapping.	Mitigation measures should be targeted at conducting SRA prior to commencement of civil works and implement SMP during the project life cycle	Security Personnel	TBD	Community vulnerability and insecurity rates	Surveys and Interviews	Community perception  Zero insecurity issues	Project Corridor	Monthly	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD
12.	Same as E1	Road users may suffer restricted access to selected roads when intervention works are ongoing	Early notification and sensitization of PAPs	Contractor	TBD	Grievances from restricted access	Surveys and Interviews	Contractor Compliance	Project Corridor	Monthly	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD
13.	Same as E1	Implementation of civil works may result to reclamation of the ROW and impact on livelihoods.	Implement RAP or ARAP	RAAMP-SU SPIUs (Safeguards Specialists);	TBD	Reclamation process	Surveys and Interviews	Zero complains/ Loss of livelihoods	Project Corridor	One-Off	RAAMP-SU FPMU	TBD
					TBD							TBD
<b>F.</b>	<b>OCCUPATIONAL HEALTH AND SAFETY RISKS AND IMPACTS</b>											
1.	Civil Works	Most activities could predispose personnel to hazards. "Unsafe behaviours" and "Unsafe conditions" will pose a serious OHS risk.	Measures should apply the "Hierarchy of Controls" according to OHS principles – Elimination, Substitutions, Engineering Controls, Administrative Controls and PPEs.	Contractor	TBD	Compliance with Hierarchy of Controls	Visual Observation  Interviews	Compliance to mitigation measures	Project Corridor	Weekly	RAAMP-SU SPIUs (Safeguards Specialists); Supervisory Consultant	TBD
<b>Sub-total cost</b>					TBD							TBD
<b>Total</b>					TBD							TBD

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### ESMP – OPERATION PHASE

S/N	Activity	Potential Impacts	Mitigation Measures	Responsibility For Mitigation	Cost of Mitigation	Parameters to be Measured	Method of Measurement	Performance Indicator	Sampling Location	Frequency of Monitoring	Responsibility for Monitoring	Cost of Monitoring
<b>G. ENVIRONMENTAL IMPACTS</b>												
1.	Same as A1	Deterioration of local air quality due to the release of dust and exhaust gases	Installation of speed breakers and speed limit to reduce vehicular speed	Contractor	TBD	Installation of speed breakers and limits	Inspection	Compliance	Project Corridor	One-Off	RAAMP-SU SPIUs (Safeguards Specialists);	TBD
<b>Sub-total cost</b>					<b>TBD</b>							<b>TBD</b>
<b>H. SOCIAL RISKS AND IMPACTS</b>												
1.	Same as A1	Workers will be relieved of their duties at the commencement of the operational phase.	Describing clauses clearly, and duration of engagement in contract agreements.		TBD	Contract Agreements	Review of acknowledgement copies of Contract Agreements	Acceptance and understanding of Contract clauses	Project Corridors/ RAAMP-SU	Monthly	RAAMP-SU SPIUs (Safeguards Specialists);	TBD
2.	Same as A1	Increase in road accidents long rehabilitated roads	Installation of speed breakers and speed limit to reduce vehicular speed	Contractor	TBD	Installation of speed breakers and limits	Inspection	Compliance	Project Corridor	One-Off	RAAMP-SU SPIUs (Safeguards Specialists);	TBD
<b>Sub-total cost</b>					<b>TBD</b>							<b>TBD</b>
<b>Total</b>					<b>TBD</b>							<b>TBD</b>

This ESMF cannot ascertain the cost of mitigation and monitoring as this will be decided when the site-specific E&S assessments are been prepared by the states.

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### 6.12.2 Monitoring and Reporting

As described in the ESMP matrix table (Table 27), monitoring for evaluating the environmental and social performance of mitigation measures will be done all through the sub-project/intervention works phases (Pre-Rehabilitation/Pre-Construction, Rehabilitation/Construction and Operation Phases) and specifically for sub-projects/intervention works screened for approval for the preparation of an environmental and social assessment. Summarily, monitoring will be conducted for ESMF implemented and subsequently ESMP implementation for sub-projects/intervention works.

### 6.12.3 Procedures for Adaptive Management of Risks During Monitoring Site-Specific ESMPs or Sub-Projects/Intervention Works Under RAAMP-SU

The RAAMP-SU shall adopt the following steps/procedures for adaptive management of risks during monitoring for ESMP implementation.

- Supervisory Consultants shall conduct regular inspections of ongoing civil works to assess progress, quality, and Contractors' adherence to technical specifications as captured in the engineering designs/drawings including environmental and social clauses in their contracts. This information helps identify potential risks such as delay in civil works completion or meeting required milestones, material shortages, or non-compliance with the requirements of the ESSs (especially where Contractors are fully responsible e.g. in preparation of CESMP, Labour Influx Management Plan, Borrow Pit Management and Reclamation Plan).
- Supervisory Consultants shall ensure quality control by monitoring construction activities to ensure that materials are used appropriately (resource efficiency – ESS 3). Contract LOTs requirements, method statements, construction techniques etc. should be followed correctly. Where designs should adopt the Green Roads for Water Approach, Supervisory Consultants shall ensure that Contractors are complying. Road upgrades and rehabilitation works should be built to expected standards and designs should ensure resilience to climatic factors such as flooding and erosion; and should be sustainable. Any deviations from quality standards should be promptly addressed to prevent “stop work orders”, grievances from PAPs or interested parties etc.
- Safeguards units of SPIUs shall ensure effective and routine E&S monitoring. E&S risks and impacts of construction activities, such as soil erosion, water pollution, removal of structures from the ROW of rural roads etc. must be monitored to see how these impacts change existing baseline conditions and their chance of reversibility. By tracking these impacts, SPIUs can ensure that Contractors implement mitigation measures or adopt alternative designs, adjust construction practices etc., to minimize adverse risks and impacts and ensure compliance with regulatory requirements and the ESSs.
- Grievance Redress Mechanism (GRM): The RAAMP-SU GRM, sub-project GRM, and GBV GRM need to be brought into play for the purpose of gathering feedback from local communities regarding the E&S impacts of sub-projects/intervention works. This information can help identify social risks and grievances early on, allowing all levels of the GRM to address concerns, resolve conflicts, and maintain positive relationships with affected persons at their respective levels and refer them upwards where need be.
- Safeguards units (in association with Consultants' if required) shall use obtained monitoring data to identify emerging risks, cumulative impacts and assess their potential impact on project activities, timelines, and budgets.
- Effective E&S monitoring at the state level will allow for the application of monitoring information to aid RAAMP-SU generally in adaptive decision-making in real-time or adjust project plans as necessary to address identified risks and challenges. This may involve reallocating resources, revising construction schedules, conducting design reviews and preparing updated engineering designs, updating security risks assessments, revisiting watershed studies, identifying new or emergent disaster/hazard risks in project locations or engaging with relevant stakeholders to find collaborative solutions.



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- Regular reporting on E&S monitoring should also be carried out by Safeguards Units and Supervisory Consultants where applicable. Monitoring reports shall be forwarded to the RAAMP-SU FPMU Safeguards Unit for review, evaluation and further actions.

### Reporting Procedures

The reporting procedures are presented in Table 27 below

**Table 27: Reporting Procedures**

Phase	Responsibilities	Deliverables	Accountability
Pre-Rehabilitation/ Pre-Construction	RAAMP-SU SPIU Safeguards Specialists	Report of monitoring activities including any specific events	RAAMP-SU FPMU, FMEnv on request
Rehabilitation/ Construction	RAAMP-SU Safeguards Specialists	Two (2) monitoring Reports, the first to be prepared mid-way into the rehabilitation/construction and the other upon completion of all sub-projects/intervention works	RAAMP-SU FPMU, FMEnv on request
	RAAMP-SU Safeguards Specialists	Additional Reports according to specific conditions e.g., grievances, Accidents, serious environmental/social impacts etc	RAAMP-SU FPMU, FMEnv on request
Operation	RAAMP-SU Safeguards Specialists	Final Monitoring Report including all monitoring activities throughout project implementation	RAAMP-SU FPMU. Report to be archived and made available to the World Bank, & FMEnv on request

### Record Keeping and Control

The RAAMP-SU SPIUs are required to keep records providing evidence on environmental and social monitoring and E&S performance evaluation for sub-projects/intervention works. Such records should be built upon feedback from individual monitoring plans prepared for subprojects/intervention works; and from a general compliance perspective through the demonstration of oversight functions and supervision by the RAAMP-SU FPMU. These documents should be made available to the Bank and FMEnv upon request.

### Contractual Measures

Most of the mitigation measures may be obligatory for the Contractors implementing sub-projects/intervention works during the Pre-Rehabilitation/Pre-Construction, Rehabilitation/Construction and Operation Phases. Contractual measures should include:

- Environmental and Social clauses: Environmental and social mitigation measures to be undertaken by the Contractor.
- Cost of mitigation measures only be added to the cost of the contractual document as a provisional sum.
- Need to prepare a CESMP which should emphasize specifically, the Contractor's approach to minimizing environmental and social impacts during implementation of sub-projects/intervention works. The CESMP should take guidance from the Contractor's mitigation responsibilities as presented in the ESMP. The CESMP must be submitted by the Contractor and approved by the RAAMP-SU SPIUs before works commence.
- Contractor's Code of Conduct – Preventing SEA/SH, VAC:** A Contractor's Code of Conduct should be prepared by the Contractor and signed; and should form part of the bids/contract agreement. To a minimum, the Code of Conduct should address: Standards of Conduct such as (a) Conflicts of interest (b) quality of products and services, (c) health and safety- reporting injuries and unsafe conditions (d) workplace violence, labour and human rights, ethics, customer relations, reporting violations, (e) sex with a person under 18 is prohibited etc.
- Individual Code of Conduct Preventing SEA/SH, VAC:** At a minimum, the individual code of conduct should spell out acceptable behaviour, consequence of violation, the routes for resolution of conflicts in any instance where personal interests conflict general interests regarding to the sub-projects/intervention works, outside

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work conduct, due diligence in providing required services, individual commitment to sustainable environmental practice during project implementation activities, etc.

- **Manager’s Code of Conduct Preventing SEA/SH, VAC:** The Manager’s Code of Conduct should to a minimum address: Manager’s obligations to workers which include i) worker’s compensation plan, ii) resolution of conflict among workers (iii) obligations to payment of workers’ salaries (iv) workers’ health care (v) general communication protocol (vi) disciplinary procedures (vii) procurement recruitment and termination procedures, etc.

### ESMF Cost Estimates

This ESMF cannot ascertain the cost of mitigation and monitoring as this will be decided when the site-specific E&S assessments are prepared by the states.

The total cost for the Disclosure of the ESMF and Capacity Building for the ESMF Implementation throughout the period of the project is estimated at **One Million, Two Hundred and Six Thousand, Seven Hundred and Eleven Dollars, One Cent Only (USD 1,206,711.01)**. This is equivalent to **One Billion, Eight Hundred and Thirteen Million, Eight-Three Thousand and Three Hundred Naira Only (1,813,083,300.00 NGN)**. See Table 28 below. The 5-year capacity building plan for the ESMF implementation is provided in Section 7.4.1 (Table 31).

**Table 28: ESMF Overall Estimate**

S/N	Item	Responsibility	Estimated Cost (NGN)	Estimated Cost (US\$)
1.	Mitigation	Contractors and other parties involved in mitigation	TBD	TBD
2.	Monitoring	RAAMP-SU FPMU; FMEnv; etc SPIUs, SMEnv; SEPAs;	TBD	TBD
<b>Sub-total</b>			Nil	Nil
3.	Capacity Building (5 Years Plan)	RAAMP-SU FPMU & SPIUs; Supervisory Consultants & Contractors; Community GBV-GRM Focal persons, etc.	1,711,500,000.00	1,139,101.50
4.	Disclosure	RAAMP-SU FPMU (Federal level disclosure)/RAAMP-SU SPIU (States, LGAs and Local Level)	15,246,000.00	10,147.09
5.	<b>Sub - Total</b>		1,726,746,000.00	1,149,248.59
6.	Contingency	5% of Sub-Total	86,337,300.00	57,462.43
<b>TOTAL</b>			<b>1,813,083,300.00</b>	<b>1,206,711.01</b>

**Note:** USD to Naira exchange rates as at May 14, 2024 1 USD = NGN 1,502.50 was applied and figures rounded up.

### 6.13 Environmental and Social Audit

As part of the entire process of assessing the environmental and social performance of the sub-projects/intervention works carried out by states and the FCT, the procurement of professional services from qualified E&S Consultants shall be sort for by the RAAMP-SU FPMU to conduct an environmental and social audit for all project civil works activities. The timing for the E&S audit shall be agreed upon by the FPMU and the Bank so that it is carried out at a time when adequate and substantial information on E&S performance of sub-projects/intervention works and reasonable evaluation can be achieved. The objective of the E&S audit broadly will be to assess and establish the performance of the project activities and their compliance to the ESSs.

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### ESMF Implementation Schedule

The activities related to achieving implementation of the ESMF are provided in Table 29 below.

**Table 29: Schedule for the RAAMP-SU Implementation Prior to ESMF Disclosure to Operation Phase of Sub-Projects**

S/N	Activity Description	Responsibility	RAAMP-SU ESMF IMPLEMENTATION PHASE				
			Prior to ESMF Disclosure	After ESMF Disclosure	Before Commencement of civil Works	During Civil Works	During Operation Phase of Sub-projects
1.	Stakeholder Engagement	All Worker Types describe in the LMP					
2.	ESMF Intentional Arrangement Actors Planning & Strategy Meetings	FPMU					
3	Capacity Building on ESMF Implementation for SPIUs	FPMU					
4	Review and Approval of Budget for ESMF Implementation	Bank/FPMU					
5.	E&S Screening/Scoping of Subprojects/Intervention Works	SPIUs/SMEEnv					
6	Preparation of E&S Assessments (ESMPs Mainly). Unless E&S risk ratings increase to a higher risk rating.  Disclosure of States E&S assessments	SPIUs/Independent Consultants					
7	Training of Supervisory Consultants, Contractors and	FPMU/SPIUs					
8	Implementation of ESMPs/CESMPs	SPIUs/Contractors/Responsible Institutions					
9	E&S Monitoring and Performance Evaluation	Responsible Institutions, identified in instruments					
10	Submission of E&S progress reports to the Bank Implementation Support Missions	FPMU/SPIUs					

# CHAPTER 7 – ENVIRONMENTAL, SOCIAL AND HEALTH & SAFETY CAPACITY ASSESSMENT

## **7.1 Capacity Assessment of the Partner Organizations of the RAAMP Project**

The parent project (RAAMP) is funded by contributions from the GoN through the FMAFS. The project is being supported by the International Development Association (IDA), a member of the World Bank Group, through Investment Project Financing (IPF) and the L'Agence Francaise de Development (French Development Agency or AFD) in the form of a loan. Additionally, at the national level, RAAMP partner organizations include the FMWA, FMEnv, Federal Ministry of Works (FMW), Federal Ministry of Lands, Housing & Urban Development (FMLHUD), Federal Ministry of Finance (FMoF). At the state level, depending on which ministry or MDA has been mandated by the state government to lead RAAMP implementation in the state, partner organizations cut across, States Ministries of Agriculture and Rural Development, Women Affairs, Social Development, Environment, Works, Lands; as wells as State Agencies – SEPA, SWMAs etc. RAAMP-SU will leverage on these existing partnerships and much more; but with the inclusion of the RARAs which are expected to ensure sustainability of the project's inputs and outputs post RAAMP-SU.

### **7.1.1 Objectives of the Assessment**

The Objective of the capacity assessment is to evaluate and ascertain the institutional capacities of the partner organizations for RAAMP to support the implementation of RAAMP-SU. For the international and national partners saddled with higher responsibilities, the assessment aims to highlight the technical capacity and experience of the organizations in planning, driving, and achieving outputs for Donor-funded projects, especially in Nigeria. Generally, for all 36 states and the FCT, the objective is to assess the existing environmental, social, health and safety legislative framework which gives the requisite MDAs the leadership advantage to drive E&S expectations of the RAAMP-SU. For states already participating in the parent project, the capacity assessment also seeks to adopt lessons learnt as a front runner for better implementation of RAAMP-SU. It also provides insights on the strengths, weaknesses and opportunities as regards environmental, social, health and safety performance; organizational actions to support staffing capabilities as well as institutional threats which may impede optimization of the RAAMP-SU PDO and expected results.

### **7.1.2 The Approach**

The following approach has been applied to undertake the capacity assessment for RAAMP and RAAMP-SU:

- a. Identification of equivalent state policies, laws and regulations to the relevant ESSs and their requirements.
- b. Analysis of environmental, social, health and safety legal and regulatory provisions.
- c. Development of a Capacity building/training plan for RAAMP-SU staff and supporting MDAs on ESMF implementation subject areas (ESF, ESSs, E&S assessments, SRA, GBV, etc.).
- d. E&S capacity assessment of RAAMP implementing agencies (main agency, co-implementing and other agencies involved in E&S management).
- e. Overall evaluation of strengths, weakness and institutional threats as regards E&S performance.

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### 7.2 Result of the Capacity Assessment

Section 6.2.1 provides a listing of the relevant ESSs and equivalent policies, laws and regulations at the state level. Section 6.2.2 provides a state level analysis of gaps in government policies, laws and regulations (kindly refer to Chapter 3, Section 3.4 for the Gap Analysis of World Bank Requirements and National Laws). A SWOT analysis (strengths, weakness opportunities and institutional threats) was conducted to assess the capacity of the SPIUs to implement the ESMF at the level of the states and this is presented in Table 32 below.

#### 7.2.1 Relevant ESSs and Equivalent Policies, Laws and Regulations

It has already been stated that RAAMP-SU will be operating on the basis of the ESF. The prospective RAAMP-SU states and the FCT policies, laws and regulations and their relevant ESSs has been included in Chapter 3, Sub-section 3.1.8, Table 4

##### 7.2.2.1 Environment – Gaps and Capacity Building Measures

There are gaps in the frameworks to drive the sustainability of ecosystem services, assessment of risks and impacts of developments on biodiversity, etc. Generally, more states lack policies, laws and regulations on biodiversity conservation. Therefore, institutional strengthening and capacity building are required. The capacity building should emphasize determination of buffer zones from natural, forest, game reserves, etc. for road rehabilitation projects. Additionally, capacity building requirements shall encompass strategies for increasing resilience of ecosystems to development projects such as intervention works that will be undertaken by RAAMP-SU.

##### 7.2.2.2 Social – Gaps and Capacity Building Measures

There is a wide understanding amongst some MDAs in the states on the implementation of projects where the Bank's OP 4.12 (Involuntary Resettlement) was triggered, and also in the implementation of projects running on the ESF for which ESS 5 is relevant. This presents an advantage for the SPIUs to meet the requirements of ESS 5 during RAAMP-SU implementation, in that there is vast experience in RAP implementation, monitoring, and grievance redress. It is noteworthy to state that the Land Use Act of 1978 is brought into effect at the state level in the issues of land acquisition, in that the Act extends ownership of all lands to the governor of the state. Additionally, in order to strengthen social performance of SPIUs, capacity building on other social aspects such as gender capture, GBV and SEA risks, GBV Action Plan for RAAMP-SU implementation, GBV GRM, and project GRM implementation, etc. will be of immense value to SPIUs in their capacity to address social matters that may arise during RAAMP-SU implementation.

##### 7.2.2.3 Occupational Health and Safety (OHS) – Policies, Laws and Regulations Analysis

More robust guidelines, measures and actions are required to ensure and assure RAAMP-SU implementation meets the requirements of ESS 2 and requisite EHSGs. This means that the project will need to establish stronger working relationships with the FMLE (at the national level), labour offices and bureaus of labour at the state level, for the purpose of capacity building and knowledge sharing on policies relevant to OHS which will likewise improve RAAMP-SU implementation and align with the requirements of ESS 2 and requisite EHSGs. Furthermore, more elaborate capacity building on OHS will be required to enable SPIUs Safeguard teams administer adequate guidance to Supervisory Consultants and Contractors during implementation of intervention works.

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### 7.3 Roles and Capacities of Agencies Involved in E&S Risk Management

#### 7.3.1 Main Implementing Agency of the Parent Project - RAAMP

**Role** - The Federal Department of Rural Development (FDRD) is the main implementing agency of the parent project under the FMAFS and shall extend this position in the implementation of RAAMP-SU. It performs E&S responsibilities through the RAAMP FPMU which has a makeup of staff from the FDRD, other implementing agencies and Technical Assistance Consultants. The FPMU furthermore administers its responsibilities through different offices/positions and importantly through its safeguard unit/team for the carrying out of E&S roles and responsibilities (majorly oversight functions, capacity building, review of E&S documents, instruments, liaison with the Bank's E&S specialists, guidance and advisory to SPIUs etc.). The Safeguards team/unit will also assist RAAMP-SU implementation, as it has gained experience overtime in the assessment and management of E&S risks and impacts associated with the implementation of RAMP, RAMP2, and RAAMP (the parent project). The FPMU safeguards unit comprises of Environmental and Social Safeguard Officers (ESOs & SSOs) respectively, GBV Officers, and Technical Assistance Consultants (TAs) on Environment, Social Development and GBV respectively. Similar to the FPMU, the E&S structure for the SPIUs consist of TAs (Environment, Social Development and GBV) including Environmental, Social Development and GBV Officers.

**Capacity to assure E&S Risk Management under RAAMP- SU** - The FPMU has the capacity to assure E&S risk management under RAAMP-SU by overseeing, advising on, and directing the preparation, review, clearance and disclosure procedures of requisite E&S instruments as it is trained on Bank procedures, the ESF, ESSs, GPNs, Guidance Notes, EHSGs, etc. The staffing levels at the FPMU are sufficient with adequate experience to carry out assigned roles. The FPMU demonstrates a robust capacity to oversee state level implementation; such that activities for example, subprojects/intervention works meet the requirements of the ESSs relevant to RAAMP-SU and much more. The TAs are well-equipped to facilitate training sessions tailored to the specific needs of RAAMP-SU Prospective States and the FCT; ensuring comprehensive understanding and effective implementation of the ESMF and management plans which may be included in subsequent environmental assessments. Similarly, the ESOs, SSOs and GBV Officers within the FPMU are equipped with the necessary skills and expertise to seamlessly drive E&S performance under RAAMP-SU. While the TAs are contracted experts, the ESOs have been seconded by their respective ministries (FMEnv, FML, FMWA) to support the parent project and likewise RAAMP-SU. There is also cross-cutting subnational experience in the safeguards unit which shall be beneficial considering that RAAMP-SU will have a nationwide coverage.

#### 7.3.2 Supporting Agencies of Parent Project - RAAMP

The E&S risks management roles of the RAAMP co-implementing agencies (FMEnv, FMWA and FML) are summarized below.

**Roles** – The FMEnv provides environmental policy integration, and environmental compliance assurance functions to support the parent project and shall extend these to RAAMP-SU. It will also compliment E&S actions captured in the ESCP for RAAMP-SU through the national environmental regulatory frameworks, where the national provisions are materially consistent with the requirements of the ESSs. Additionally, the FMEnv will make available the procedures and guidelines for registration and disclosure of E&S instruments. Importantly, it has provided staff from its EA department to support the parent project and likewise RAAMP-SU. The FMWA through its Women and Gender Affairs Department is likewise supporting RAAMP and consequently RAAMP-SU with GBV Officers. It is also driving RAAMP to achieve gender equality, women's participation, mapping of GBV service providers, reducing project implementation risks contributing to SEA/SH (such as labour influx) etc. To achieve its set goals nationally and subnationally, the Women and Gender Affairs Department of the FMWA works in close collaboration with Gender Desk Officers in line Ministries and Agencies, Women focused Non-Governmental Organizations and Cooperative Groups, Civil Society Groups, Legislatures etc. across the states which should benefit RAAMP-SU implementation. The FMLHUD is responsible for sustainable and effective use and management of land and orderly development of urban and rural areas as well as safe, planned and adequate housing for socio-economic development. For RAAMP it provides



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guidance on the provisions and application of the Land Use Act (1978) and is a principle consultative partner for the project on matters surrounding land use and involuntary resettlement. It will support RAAMP-SU in achieving the requirements of ESS 5 where the national provisions are materially consistent with the requirements of this ESS and ESS 1. Moreso, the FMLHUD has provided staff to support the FPMU as SSOs on land related matters.

**Capacity to assure E&S Risk Management under RAAMP- SU** – The FMEnv has developed the national environmental framework to support the protection of the environment, assessment and management of environmental and social risks and impacts of development projects in the country. With this in perspective, it has institutional capacity and strengths on environmental subject matter cutting across environmental and social assessment, climate change, erosion and coastal zone management, forest conservation, pollution control etc. Several staff of the FMEnv have been involved in the implementation of donor-funded projects in-country, including Bank funded projects. Some of the federal ministry's personnel are currently involved in donor funded project implementation which is evidence of up-to-date capacity to provide guidance and policy oversight in the management of E&S risks associated with RAAMP-SU implementation. The FMWA has been involved in women education, empowerment, and capacity building programs through government and donor funded mechanisms. The federal ministry is routinely engaging with women groups directly and in coordination with partner organizations and MDAs at the state levels. This gives it an advantage to support and advise on gender capturing activities to be undertaken during RAAMP-SU implementation, contribute to learning experiences and assist in the implementation of the RAAMP-SU action plan. The FMLHUD is conversant with its own regulatory provisions on land use and also those of the Bank as a result of its engagement on Bank funded projects (closed and on-going). Several of its staff have been involved in the RAP review process for numerous projects. This experience will add value to meeting the requirements of ESS 5 during RAP preparation and implementation for subprojects amongst many other technical proficiencies (hard and soft skills, knowledge and abilities needed to perform required tasks).

### 7.3.3 Other Agencies Important for E&S Safeguards of RAAMP Project

Multiple MDAs at the state levels are involved in RAAMP implementation and have staff which constitute some of the SPIUs which are currently in existence. Similarly, for RAAMP-SU especially where states do not have SPIUs the same constitution from requisite ministries will be adopted. However, a lead ministry shall be appointed depending on the mandate issued by the respective state governors to champion RAAMP-SU implementation. It is important to note that the design for RAMP-SU is for the RARAs to take responsibility for the rural road rehabilitation eventually. Subsequent section is the SWOT analysis that addresses the E&S capacity of the states. See Table 30 below.

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**Table 30:SWOT analysis that addresses the E&S capacity of the states**

SWOT Analysis - Environment, Social and Health			
Strengths	Gaps	Opportunities	Threats
<ul style="list-style-type: none"> <li>SPIU has participated in several capacity building programs on GBV, Road screening, OHS, World Bank Safeguard Policies. (Abia)</li> <li>SPIU has experience in preparing E&amp;S instruments under RAAMP. (Abia, Anambra, Edo, Enugu, Kano, Kogi, Plateau)</li> <li>Establishment of Abia State Road Traffic and Safety Management Agency</li> <li>Good synergy with relevant MDAs. (Adamawa, Bayelsa, Benue, Jigawa, Edo, Kaduna, Plateau)</li> <li>Presence of functional laws, policies and regulatory framework on environment and social development. (Anambra, Jigawa, Enugu, Kano, Zamfara)</li> <li>Evidence of Tripartite (government, communities unions, &amp; individuals) engagement in investments of basic services in rural areas (Anambra, Jigawa, Kano)</li> <li>Presence of grievance and conflict resolution mechanisms and structures at the community level (Anambra, Enugu, Jigawa, Kano)</li> <li>The existence of a major legal and regulatory framework for waste management. (Anambra, Enugu, Jigawa, Kano, Zamfara)</li> <li>Presence of agencies responsible for waste management, and climate change in the state. (Anambra, Enugu, Jigawa, Kano, Nasarawa, Zamfara)</li> <li>Establishment of Rural Access Roads Agency (RARA). (Bauchi, Benue, Kano, Kogi)</li> <li>Functional SPIU under RAAMP (Abia, Adamawa, Anambra, Enugu, Kano, etc.)</li> <li>High preparedness for the implementation of RAAMP-SU. (Anambra, Bayelsa, Bauchi, Enugu, Kano)</li> <li>Presence of community-led and owned vigilante security services. (Anambra)</li> <li>ESMP Developed, GBV referral pathway established, GRM established at the grass roots. (Adamawa)</li> <li>High involvement of the Town union leadership in the proposed activities of RAAMP-SU. (Enugu, Anambra)</li> <li>Establishment of Road Maintenance/ Traffic Agency. (Jigawa, Taraba, Zamfara)</li> <li>SPIU boasts strong knowledge of equivalent and relevant regulatory framework in the state. (Bayelsa)</li> <li>Strong representation of line ministries within the SPIU particularly from the State Ministry of Women and Children (SMWA), Ministry of Transport, Ministry of Environment. (Bayelsa)</li> <li>Extensive capacity building initiatives attended by various safeguard officers, including workshops on monitoring and evaluation, citizen engagement, safeguard policies, climate change resilience, and</li> </ul>	<ul style="list-style-type: none"> <li>Huge divide between the availability of laws and policies, and their implementation &amp; enforcement. (Abia, Adamawa, Anambra, Jigawa, Kano)</li> <li>Poor synergy with MDAs. (Abia, Bauchi)</li> <li>Poor knowledge of regulatory framework by the SPIU available within the state. (Abia, Bauchi, Kogi)</li> <li>Lack of training on ESF for personnel in relevant MDAs and the SPIU. (Adamawa, Enugu)</li> <li>Absence of functional laws, policies and regulatory framework on environment and social development. (Anambra, Bauchi, Taraba)</li> <li>Limited capacity building for SPIU and MDAs. (Adamawa, Nasarawa, Taraba)</li> <li>No provisions on OHS in the state. (Adamawa, Bayelsa)</li> <li>Lack of training on E&amp;S assessment for personnel in relevant MDAs. (Anambra, Nasarawa)</li> <li>Lack of prepared safeguard instruments. (Bauchi, Benue, Enugu, Jigawa, Nasarawa,)</li> <li>Lack of training on WB ESSs and ESF. (Bauchi, Bayelsa, Plateau)</li> <li>Low female participation and representation in the SPIU. (Edo, Jigawa, Plateau, Zamfara)</li> <li>Limited development projects in the state, indicating a gap in infrastructure and economic development. (Benue)</li> <li>Lack of permanent office space for Enugu SPIU. (Enugu)</li> <li>Lack of infrastructure and equipment for waste treatment plant. (Enugu)</li> <li>Lack of data on carbon emissions in the state. (Enugu)</li> </ul>	<ul style="list-style-type: none"> <li>Potential for collaboration with MDAs. (Abia)</li> <li>Capacity building on ESSs, and climate resilience measures into road construction and maintenance projects. (Abia, Bayelsa, Jigawa, Plateau, Zamfara)</li> <li>Huge potential for a state-focused vulnerability assessment of climate change. (Anambra, Bayelsa)</li> <li>Capacity building for MDAs as training on ESMF. (Adamawa, Edo, Enugu, Kano, Plateau, Zamfara)</li> <li>Potential for collaboration with security apparatus and exchange of information on security matters, strengthening security measures and project safety. (Adamawa, Bauchi, Benue, Kaduna)</li> <li>GBV referral pathway established, enhancing social safeguard measures. (Adamawa)</li> <li>GRM established at the grassroots level, promoting community involvement and grievance redressal. (Adamawa)</li> <li>Development of safeguard instruments based on the studies already carried out, under AFDB. (Anambra)</li> <li>Generation of data on carbon emissions in the state. (Anambra, Jigawa)</li> <li>Presence of functional private recycling plants. (Anambra)</li> <li>Opportunity to leverage the well-established data bank for effective project planning and decision-making, enhancing</li> </ul>	<ul style="list-style-type: none"> <li>Possible compliance issues, legal challenges, or ineffective implementation, due to poor knowledge of regulatory frameworks. (Abia)</li> <li>Lack of documented correspondence to show establishment of RARA in the state. (Adamawa)</li> <li>Limited execution of E&amp;S responsibilities due to lack of regulatory framework. (Adamawa)</li> <li>Lack of synergy between MDAs. (Anambra, Enugu, Zamfara)</li> <li>Personnel in relevant MDAs lack knowledge on E&amp;S assessments due to lack of trainings. (Anambra)</li> <li>Potential of political interference is high which could undermine the integrity of the ESMF implementation. (Anambra)</li> <li>Although there is relative security architecture in the state owned by rural community town unions, the general security outlook of the state requires constant vigilance and intelligence gathering. (Anambra)</li> <li>Lack of knowledge in the preparation of safeguard instruments. (Bauchi)</li> <li>Lack of documented correspondence to show establishment of RARA in the state. (Bayelsa, Edo, Nasarawa)</li> <li>Risk of non-compliance due to lack of capacity building on ESS, potentially leading to project delays or cancellations. (Bayelsa)</li> <li>Threat of ongoing insecurity disrupting project activities and hindering community participation and engagement. (Benue)</li> <li>Potential negative impacts on project outcomes and stakeholder confidence due to the lack of previous development projects. (Benue)</li> <li>Lack of recent capacity-building initiatives for SPIU/MDAs may result in inadequate project oversight and implementation, affecting project outcomes and stakeholder satisfaction. (Edo)</li> <li>Continued gender imbalance in project participation may undermine inclusivity and social cohesion, impacting project effectiveness and sustainability. (Edo)</li> <li>Potential of political interference is high. (Enugu)</li> </ul>

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Environmental and Social Management Framework (ESMF) for the Nigeria Rural Access and Agricultural Marketing Scale-Up Project (RAAMP-SU)

SWOT Analysis - Environment, Social and Health			
Strengths	Gaps	Opportunities	Threats
<p>security risk assessment, enhancing the skills and knowledge base of the team. (Kaduna)</p> <ul style="list-style-type: none"> <li>Preparation of safeguards instruments such as the ESMP, RAP demonstrating proactive measures towards ensuring environmental and social compliance in project implementation under RAAMP. (Kaduna)</li> <li>Availability of relevant legislation and policies such as the VAPP Law, Edo State Gender Policy, Child Rights Law, and Social Protection Policy, providing a framework for addressing gender issues and safeguarding vulnerable groups. (Edo)</li> <li>Existence of a Grievance Redress Mechanism (GRM) in place, allowing for the escalation and resolution of community grievances, thereby promoting transparency and accountability in project implementation.</li> <li>Presence of community leaders and local court systems for handling cases, facilitating dispute resolution and promoting community participation and ownership in project activities. (Taraba)</li> <li>Memorandum of Understanding (MoU) with Civil Defense soldiers to enhance security in project communities, demonstrating proactive measures to ensure the safety and security of project personnel and assets. (Taraba)</li> <li>Good level of capacity building in the state, particularly on safeguards, monitoring and evaluation, and procurement, indicating efforts to enhance the skills and knowledge of personnel involved in project implementation. (Kogi)</li> <li>Experience in the preparation of E&amp;S instruments. (Kogi)</li> <li>Strong political will from state government to support the RAAMP-SU through the Hunters association, Peace Corps, and Livestock Management committee to address security concerns at community levels which have been successful in expelling herdsmen in communities that may pose security risks to project implementation. (Bayelsa)</li> <li>Good rapport with community leaders and youth leaders across the state. (Bayelsa)</li> <li>The safeguards unit has received capacity building on GBV. (Benue)</li> <li>Capacity building on administrative and procurement staff. (Benue)</li> <li>Good implementation and enforcement of relevant policies and laws in the state addressing gender equality and protection against violence, including the PEPSA, Gender Policy, VAPP Law, and Child's Right Law, enhancing social inclusivity and protection of vulnerable groups. (Plateau)</li> <li>Relative calm and security in most areas, supported by the presence of security apparatus such as Operation Safe Haven, ensuring safety of life and properties and enabling uninterrupted project activities. (Plateau)</li> </ul>	<ul style="list-style-type: none"> <li>There are gaps in implementation of existing framework for Waste management in the state as there exists challenges in management of waste in rural communities. (Enugu)</li> <li>Poor implementation &amp; enforcement of existing laws and policies. (Enugu)</li> <li>SPIU formed and classified as RAAMP with personnel, but yet to have office and pieces of equipment. (Jigawa)</li> <li>Absence of specialists in the RAAMP office with experience in World Bank projects. (Jigawa)</li> <li>Need for advanced training in monitoring, project management, and information and communication technology (ICT), highlighting gaps in specialized skills required for efficient project implementation and management. (Kaduna)</li> <li>Although there is a framework for Waste management in the state, there were huge visible challenges associated with Waste management especially in rural communities. (Kano)</li> <li>Limited regulatory framework in the state. (Nasarawa)</li> <li>There are no Safeguard officers only the Project Coordinator, Accountant and procurement officer at the moment. (Nasarawa)</li> <li>SPIU formed and classified as RAAMP with personnel, but not functional due internal crisis. (Zamfara)</li> <li>ZAGIS has not participated in a World Bank RAP or capacity building. (Zamfara)</li> </ul>	<p>project efficiency and outcomes. (Bauchi)</p> <ul style="list-style-type: none"> <li>Potential for further engagement with GBV service providers and stakeholders to address social issues and ensure project inclusivity and gender sensitivity. (Bauchi)</li> <li>Potential for establishing safeguards instruments to address GBV and environmental safety concerns. (Benue)</li> <li>Opportunity to attract development projects and investments to address infrastructure gaps and stimulate economic growth. (Benue)</li> <li>Development of safeguard instruments based on the studies already carried out, under RAMP-2. (Enugu)</li> <li>Implementation of Climate Change laws. (Enugu)</li> <li>SPIU personnel are well qualified and easily trainable for world bank ESMF and other guidelines. (Jigawa)</li> <li>Development of safeguard instruments using world bank ESF and guidelines. (Jigawa)</li> <li>There is avenue to increase female representation at the SPIU and MDA's. (Jigawa)</li> <li>Opportunity to enhance capacity building efforts in monitoring, project management, and ICT, enabling the team to acquire advanced skills and competencies necessary for effective project execution and delivery. (Kaduna)</li> <li>Increased synergy between MDAs and SPIU. (Kano, Nasarawa)</li> </ul>	<ul style="list-style-type: none"> <li>Lack of dedicated office space and necessary equipment, may lead to operational inefficiencies and difficulties. (Jigawa)</li> <li>Personnel in relevant MDAs lack knowledge of E&amp;S assessments due to lack of trainings. (Jigawa)</li> <li>Potential of political interference is high. (Jigawa)</li> <li>Threat of insecurity in certain areas of the state may disrupt implementation of project activities, compromise personnel safety, and hinder project progress and outcomes. (Kaduna)</li> <li>While RARA bill has been passed, no updated information on the establishment of RARA. (Kaduna)</li> <li>Personnel in relevant MDAs lack ESMF knowledge due to lack of trainings. (Kano)</li> <li>Potential of political interference is high. (Kano)</li> <li>Absence of safeguards officers. (Nasarawa)</li> <li>Moderate security challenges in proposed project communities may pose risks to project implementation and personnel safety, potentially leading to disruptions and delays in project activities. (Taraba)</li> <li>Sensitization on gender-based violence (GBV) conducted in only three LGAs may limit the effectiveness of efforts to address GBV issues across the state, necessitating broader and more comprehensive outreach and awareness campaigns. (Taraba)</li> <li>Risk of non-compliance due to lack of capacity building on ESS, potentially leading to project delays or cancellations. (Plateau)</li> <li>Gender imbalance in project participation may lead to unequal access to project benefits and opportunities, potentially exacerbating social disparities and inequalities. (Plateau)</li> <li>Presence of insecurity and banditry activities across all local government areas. (Zamfara)</li> <li>Potential of political interference is high. (Zamfara)</li> <li>Lackadaisical attitude of SPIU &amp; MDA's. (Zamfara)</li> <li>Personnel in relevant MDAs lack ESMF knowledge due to lack of trainings. (Zamfara)</li> </ul>

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SWOT Analysis - Environment, Social and Health			
Strengths	Gaps	Opportunities	Threats
<ul style="list-style-type: none"> <li>Staff trained on climate resilient practices and a security management plan in place to address potential security threats to the project. (Bauchi) SPIU received trainings on Conflict Assessment methods to identify potential Risk and Mitigation Approaches using Environmental Information System and for all Project core/support staff. (Enugu)</li> <li>Presence and involvement of security agencies, forest guards and local vigilante groups in the state. (Enugu)</li> <li>20% female representation at the SPIU and across the MDA's. (Kano)</li> <li>Several trainings on ESMF for personnel in relevant MDAs. (Kano)</li> <li>Relative peace across the state as there have been no incidence of insecurity or banditry recorded. (Kano)</li> <li>There is an existing GRM Structure at the community level across the state. (Nasarawa)</li> <li>Establishment of the Nasarawa state Rural Road Agency. (Nasarawa)</li> <li>Some MDAs have had training on other projects e.g., ACREsAL, CSDP. (Nasarawa) Collaboration of SPIUs with NGO's and CSO's on child right protection and GBV. (Zamfara)</li> <li>Presence of Zamfara Geographic Information Service (ZAGIS) which has comprehensive information and application guidelines in handling land related issues with regards to several state projects. (Zamfara)</li> </ul>		<ul style="list-style-type: none"> <li>Opportunity to further strengthen capacity building efforts in areas such as safeguards, monitoring and evaluation, and gender-responsive management, enhancing the competency and effectiveness of project personnel. (Kogi)</li> <li>Potential for collaboration with traditional rulers representing each LGA and community sensitization activities to foster community engagement and ownership of project initiatives, facilitating smoother project implementation and sustainability. (Kogi)</li> <li>Opportunity to address gender disparities and promote gender equality through targeted interventions and initiatives, fostering inclusivity and diversity in project implementation. (Plateau)</li> <li>Opportunity for MDAs to develop and implement policy and regulatory frameworks on environment and social development in the state, providing a comprehensive framework for sustainable development and environmental protection. (Taraba)</li> <li>Potential for capacity building initiatives to enhance the skills and knowledge of SPIU team. (Taraba)</li> <li>Development of E&amp;S instruments using world bank ESF and guidelines. (Zamfara)</li> <li>Potential for collaboration with ZAGIS By utilizing the accurate geospatial data and application guidelines provided by ZAGIS, the SPIU can enhance project</li> </ul>	

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Environmental and Social Management Framework (ESMF) for the Nigeria Rural Access and Agricultural Marketing Scale-Up Project (RAAMP-SU)

SWOT Analysis - Environment, Social and Health			
Strengths	Gaps	Opportunities	Threats
		planning, execution, and monitoring, thereby increasing the efficiency and effectiveness of ESMF implementation. (Zamfara)	

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Environmental and Social Management Framework (ESMF) for the Nigeria  
Rural Access and Agricultural Marketing Scale-Up Project (RAAMP-SU)

### 7.4 Capacity Building Plan

A continuous capacity building process is required in order to ensure that an E&S compliance culture is embedded in the operations of all MDAs directly and indirectly associated with ESMF implementation for RAAMP-SU. Capacity building on the ESSs and other subject areas supporting project operations which are consistent with the requirements of the ESSs shall be carried out on a planned basis throughout the implementation of the RAAMP-SU (2024 – 2029). Importantly, the capacity building framework or plan will focus on a) the improvement of technical capacity of staff to meet expected assigned E&S responsibilities (preparation, review and implementation of E&S instruments, action plans, etc.); b) procurement and supply of material resources to aid the carrying out of E&S roles and responsibilities (e.g. PPEs, E&S screening checklists, environmental monitoring devices or software, etc.), c) opportunities for benefiting from learning experiences in-country, regionally and abroad (technical workshops, project performance review, case studies from similar rural road projects etc.). Table 31 below presents the capacity building plan for ESMF implementation.



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Environmental and Social Management Framework (ESMF) for the Nigeria Rural Access and Agricultural Marketing Scale-Up Project (RAAMP-SU)

### 7.4.1 Training Plan

The capacity building requirements for the implementation of the ESMF is described in Table 31 below.

**Table 31: ESMF Implementation Capacity Building Requirements**

S/N	Year	Training Modules/Program	Participants	Facilitators/Responsibility	No. of Participants	Location	Duration	Estimated Cost NGN	Estimated Cost USD
1.	Year 1 - 2024	Nigeria EIA Procedures and Charges; Screening, Scoping, Disclosure	Safeguard Units in the RAAMP-SU FPMU & SPIUs;	FMEEnv/SMEEnv; FPMU (TA Environment; ESO)	300	Central	2 days each	50,000,000.00	33,278
		Land Use Act 1978 (Government Procedures in Land Acquisition, Compensation and Comparison with the requirements of ESS5)	Safeguard Units in the RAAMP-SU FPMU & SPIUs;	RAAMP-SU FPMU (TA Social Development, SSO – Lands and Resettlement Matters).	300	Central	2 days each	50,000,000.00	33,278
		ESMF Implementation (Screening, Including of E&S Clauses in Bidding Documents, CESMP, Institutional Roles and Responsibilities, SRA Preparation, etc.)	Safeguard Units in the RAAMP-SU FPMU & SPIUs;	Consultant	300	6 Geopolitical Zones	4 days each	120,000,000.00	79,867
		Environmental and Social Assessment Preparation; Review Monitoring and Reporting	Safeguard Units in the RAAMP-SU FPMU & SPIUs	RAAMP-SU FPMU Safeguards Unit	228	Central	4 days each	80,000,000.00	53,245
		WB ESF and Requirements of Relevant ESSs for RAAMP-SU	Safeguard Units in the RAAMP-SU & SPIUs	RAAMP-SU FPMU Safeguards unit	228	Central	2 days each	45,000,000.00	29,950
		ESHGs	Safeguard Units in the RAAMP-SU FPMU & SPIUs	Consultant	300	6 Geopolitical Zones	5 days each	100,000,000.00	66,556
		Rural Roads Administration, Construction/Rehabilitation, Operation, Supervision and Maintenance.	SPIUs	RARAs/Relevant State MDA.	111	Each State	2 days each	111,000,000.00	73,877
		GBV Action Plan/Good Practice Note	Safeguard Unit in SPIUs	RAAMP-SU FPMU (TA GBV; GBV Officers).	111	6 Geopolitical Zones	3 days each	80,000,000.00	53,245
<b>Sub-Total for Year 1</b>								<b>636,000,000.00</b>	<b>423,296</b>
2.	Year 2 – 2025	Climate Vulnerability Assessment	RAAMP-SU FPMU & SPIUs	Consultant	228	6 Geopolitical Zones	3 day each	70,000,000.00	46,589
		Emergency Preparedness and Response: Disaster Risk Management	Safeguards Unit at the SPIUs	RAAMP-SU FPMU /NEMA/SEMas	228	6 Geopolitical Zones	2 days each	45,000,000.00	29,950

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S/N	Year	Training Modules/Program	Participants	Facilitators/Responsibility	No. of Participants	Location	Duration	Estimated Cost NGN	Estimated Cost USD
		Accident Reporting/Root Cause Analysis/ESIRIT.	RAAMP-SU SPIUs; Supervisory Consultants & Contractors	RAAMP-SU FPMU	300	6 Geopolitical Zones	2 days each	45,000,000.00	29,950
		SRA/SMP Implementation and Monitoring	RAAMP-SU SPIUs; Supervisory Consultants & Contractors	RAAMP-SU FPMU	300	6 Geopolitical Zones	2 days each	45,000,000.00	29,950
		Technical Approach to alternative options for project designs to reduce design related E&S risks during project implementation.	Safeguards Unit at the SPIUs	Consultant	228	6 Geopolitical Zones	1 day	25,000,000.00	16,639
		Learning Workshop	All RAAMP-SU Implementing Institutions (where required)	World Bank/RAAMP-SU FPMU	Proposed to be sorted in 6 "batches". Each batch will comprise a mixture of representatives from different SPIUs across the 6 geopolitical zones to improve the learning experience.	Central	14 – 18 days	200,000,000.00	133,111
<b>Sub-Total for Year 2</b>								<b>430,000,000.00</b>	<b>286,189</b>
	Year 3 - 2026	Procurement of E&S/OHS Technical Support Material Resources and Commodities (PPEs, Software, etc.)	N/A	RAAMP-SU FPMU	N/A	All States	TBD	15,000,000.00	9,983
		ESS1 Extensive Training Session on Guidance Notes and Application Review on its Implementation in Sub-project activities at the states.	Safeguard Units in the RAAMP-SU SPIUs	World Bank/RAAMP-SU FPMU/Consultant	75	Central	2 days each	15,000,000.00	9,983
		ESS 5 Extensive Training Session on Guidance Notes and Application Review on its Implementation in Sub-project activities at the states.	Safeguard Units in the RAAMP-SU SPIUs	World Bank/RAAMP-SU FPMU/Consultant	75	Central	2 days each	15,000,000.00	9,983
		ESS 10 Extensive Training Session on Guidance Notes and Application Review on	Safeguard Units in the RAAMP-SU SPIUs	World Bank/RAAMP-SU FPMU/Consultant	75	Central	2 days each	15,000,000.00	9,983

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Environmental and Social Management Framework (ESMF) for the Nigeria Rural Access and Agricultural Marketing Scale-Up Project (RAAMP-SU)

S/N	Year	Training Modules/Program	Participants	Facilitators/Responsibility	No. of Participants	Location	Duration	Estimated Cost NGN	Estimated Cost USD
		its Implementation in Sub-project activities at the states.							
		Waste Management and considerations for ESS 3	Supervisory Consultants & Contractors	RAAMP-SU SPIU Safeguards Unit	TBD	6 Geopolitical Zones	1 day each	55,500,000.00	36,938
		Learning Workshop	All RAAMP-SU Implementing Institutions (where required)	World Bank/RAAMP-SU FPMU	Proposed to be sorted in 6 "batches". Each batch will comprise a mixture of representatives from different SPIUs across the 6 geopolitical zones to improve the learning experience.	Central	14 – 18 days	200,000,000.00	133,111
<b>Sub-Total for Year 3</b>								<b>315,500,000.00</b>	<b>209,981.00</b>
6.	Year 4 – 2027	Post-Project Implementation Monitoring	RAAMP-SU SPIUs	RAAMP-SU FPMU	148	Central	5 days	60,000,000.00	39,933
		Sustainable management of sub-projects/intervention works - Operation and Maintenance (O&M)	RAAMP-SU SPIUs and RARAs	World Bank/RAAMP-SU FPMU/Consultant	148	Central	2 days	50,000,000.00	33,278
		Technical/Learning Workshop	All RAAMP-SU Implementing Institutions (where required)	World Bank/RAAMP-SU FPMU	Proposed to be sorted in 6 "batches". Each batch will comprise a mixture of representatives from different SPIUs across the 6 geopolitical zones to improve the learning experience.	Central	14 – 18 days	200,000,000.00	133,111
<b>Sub-Total for Year 4</b>								<b>310,000,000.00</b>	<b>206,322</b>

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Environmental and Social Management Framework (ESMF) for the Nigeria Rural Access and Agricultural Marketing Scale-Up Project (RAAMP-SU)

S/N	Year	Training Modules/Program	Participants	Facilitators/Responsibility	No. of Participants	Location	Duration	Estimated Cost NGN	Estimated Cost USD
7.	Year 5 – 2028	Final Workshop on Lessons Learnt,	RAAMP-SU SPIUs	World Bank/RAAMP-SU FPMU	300	Central	5 days	120,000,000.00	79,867
<b>Sub-Total for Year 5</b>								<b>120,000,000.00</b>	<b>79,867</b>
<b>Grand Total Training Cost</b>								<b>1,811,500,000.00</b>	<b>1,205,655.00</b>

The exchanged rate use was at May 14, 2024 1 USD = NGN 1,502.50

**Note:** Training estimates are considered to cater for i) Resource persons ii) participants per diems, hotel accommodation, feeding, transportation, ii) venue hiring, iv) local travels, v) training materials etc.

The estimated Budget for capacity building on ESMF Implementation throughout the project cycle is **NGN 1,811,500,000 (USD1,205,000)**.

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Environmental and Social Management Framework (ESMF)  
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### 7.4.2 Monitoring and Evaluation

Generally, states currently participating in RAAMP, as well as other states which may be part of the RAAMP-SU exhibit capacity in monitoring and evaluating project performance. This is largely due to their involvement in previous donor-funded projects, where environmental and social monitoring and evaluation were integral components. Many of these projects mandated the presence of Monitoring and Evaluation (M&E) officers within their SPIUs to oversee M&E responsibilities. Drawing from this experience, RAAMP-SU implementation benefits from a solid foundation in M&E practices. Furthermore, capacity-building programs on M&E have been conducted across the states by various organizations such as USAID, EU, DFID, and the Bank, particularly for previous projects like RAMP, RAMP2, and RAAMP under the FMAFS. Bank-funded projects often prioritize the establishment of Management Information Systems (MIS), enabling MIS officers to effectively manage, store and retrieve documents and reports on project implementation and monitoring. Additionally, there is a culture of information sharing among projects within the states. States that have benefitted from bank-funded projects have also been involved in implementation support missions, leading to the preparation of aid memoirs that incorporate lessons learned for future projects. In summary, the capacity for M&E exists yet there are opportunities for continuous improvement through capacity building and learning experiences.

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Environmental and Social Management Framework (ESMF)  
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Up Project (RAAMP-SU)

# CHAPTER 8 – INSTITUTIONAL FRAMEWORK

## 8.1 Key Institutions/Persons Involved in the Implementation of the RAAMP-SU ESMF

The Key Institutions/Persons to be involved in the implementation of the RAAMP-SU ESMF shall include the FPMU (largely through its safeguards unit), SPIUs (largely through their safeguards units), Civil Society Organizations (CSOs) – especially those concerned with gender inclusion and GBV (SEA/SH/VAC), and supporting MDAs at the federal (FMAFS, FMEnv, FDRD, FMLE, FMWA, NEMA) and state levels (SMEnvs, SEPAs, SWMAs, SEMAs, RARAs, FRSC state offices, CBOs and other “Interested Parties” which will be identified in the implementation of continuous stakeholder engagement during RAAMP-SU implementation). Importantly, some states have not established SPIUs. This may at this time create some difficulty in assigning particular responsibilities for ESMF implementation in these states (Notably, Nasarawa, Rivers, Delta, Lagos states and the FCT). However, some MDAs such as Ministry of Environment, Ministry of Agriculture and Rural Development, Ministry of Urban and Rural Development, Ministry of Women and Social Affairs etc.; in the states without SPIUs were engaged as regards RAAMP-SU and their capacity to implement the ESMF.

### 8.1.1 Governmental and Non-Governmental Organizations

A brief description of the roles of Governmental and Non-Governmental Organizations involved in ESMF implementation is summarized in Table 32 below.

**Table 32: Roles and Responsibilities of Governmental and Non-Governmental Organizations**

S/N	Organizations	ESMF Roles and Responsibilities
<b>Governmental Organizations</b>		
1.	FMEnv	The FMEnv shall provide the guidelines and procedures required for in-country disclosure of the ESMF and subsequent E&S assessments to be prepared at the state levels through its EA Department. Currently, the EA department has provided supporting staff to the RAAMP-SU FPMU who in addition help bring the integration of the country's E&S framework (where and when necessary) in RAAMP-SU implementation. The FMEnv will also aid the RAAMP-SU FPMU in coordinating with its departments and agencies on monitoring responsibilities as regards this ESMF and other program instruments where required.
2.	FMAFS	The FMAFS is the implementing ministry and shall coordinate and liaise directly with the FDRD on ESMF implementation matters. In addition, it will speed up coordination activities (where required) with other federal ministries involved in ESMF implementation so as to facilitate information sharing, strategizing, and shall report ESMF and overall RAAMP-SU implementation to the Federal Executive Council (FEC).
3.	FDRD	The FDRD is the department overseeing the affairs of the RAAMP-SU on behalf of the FMAFS. The Federal Project Steering Committee is domiciled in this department and will support project decisions at the ministerial level.
4.	FMLE	The FMLE is the federal ministry concerned with relations between workers and employers. It will exercise responsibility in ESMF implementation by ensuring implementation activities especially those involving workers are consistent with the provision of the National Policy on Labour (1999), the RAAMP-SU LMP and support the safeguards unit of the FPMU in assuring the requirements of ESS 2 are in keeping throughout project implementation. The FMLE will as well support labour and OHS compliance at the state levels through its 36 labour offices including the labour office in the FCT. The Department for OHS of the ministry will act principally on the ministry's behalf.
5.	FMWA	The FMWA was created consequent upon of the response to The United Nations agreement to establish Institutional Mechanisms for the advancement of Women and Women matters. Specifically, the FMWA through its Department for Women and Gender Affairs will support ESMF implementation through mainstreaming its women and gender affairs approach with the GBV action plan for RAAMP-SU and the Bank's Good Practice Note - Addressing SEA/SH in Human Development Operations. Currently, the FMWA has



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S/N	Organizations	ESMF Roles and Responsibilities
		seconded an officer to support the RAAMP FPMU. Similarly, states with SPIUs have the same structure which will be adopted for new states/SPIUs.
6.	SMWA	Depending on their mandate they shall assist ESMF implementation on gender issues and in the mapping of GBV services. Additionally, partner with the SPIUs in sensitization and awareness campaigns and grass root programs/initiatives targeted at women inclusion and development.
7.	FPMU	Serve as the central coordinating body for the implementation of the ESMF across all RAAMP-SU states. Develop and disseminate guidance materials, templates, and training programs to support SPIUs in implementing the requirements of the ESSs relevant to RAAMP-SU. Monitor and evaluate the performance of SPIUs in complying with environmental and social standards and requirements. Facilitate knowledge sharing and exchange of best practices among SPIUs to enhance implementation. Coordinate RAAMP-SU GRM implementation, GBV Action Plan, project Security Management Plan (SMP) etc.
8.	SPIUs	Implement the ESMF at the state level, ensuring that the requirements of the relevant ESSs are integrated into all RAAMP-SU subprojects. Conduct environmental and social assessments and prepare necessary E&S instruments, such as Environmental and Social Management Plans (ESMPs) and Resettlement Action Plans (RAPs) etc. Provide training and capacity building to SPIU staff and stakeholders on the ESF, the relevant ESSs to RAAMP-SU, E&S compliance requirements etc. Establish and maintain Grievance Redress Mechanisms including SEA/SH GRM, to address community concerns related to environmental and social risks and impacts of subproject activities. States shall also conduct SRA and implement their SMPs as part of ESMF implementation.
9.	Safeguards Units	Safeguards units in the FPMU and SPIUs shall take lead in assuring that sub-projects/intervention works designed and implemented by RAAMP-SU are in keeping with the requirements of the ESSs. They shall ensure that E&S assessments prepared by Consultants' meet the Banks's requirements and play a role in liaisons with the SMEnvs/FMEnv in registering sub-projects/intervention works and seeing to their disclosure. Importantly, SPIUs shall conduct E&S screening of subprojects and shall prepare screening reports and TORs for E&S assessments; which shall be reviewed by the FPMU Safeguards Unit and cleared by the Bank. All Safeguard responsibilities summarised in numbers 7&8 of this Table shall be driven by the Safeguards Unit.
10.	NEMA/SEMAs	NEMA shall provide supportive coordinating responsibilities to the FDRD/FPMU in the event of emergencies and natural disasters; while the State Emergency Management Agency (SEMA) shall provide same at state levels. NEMA shall collaborate with RAAMP-SU in aligning its approaches in the National Disaster Management Framework with the requirements of ESS 4 (WB Guidance Notes on Community Health and Safety - Emergency Preparedness and Response), where applicable. NEMA and the SEMAs will support ESMF implementation through Emergency Preparedness and Response approaches.
11.	SMEnvs	The SMEnvs shall exercise the power of the FMEnv at the level of the states such that in ESMF implementation they will provide the E&S policy framework to guide RAAMP-SU civil works implementation. In addition, SMEnvs shall participate in the E&S screening of projects and in the disclosure of cleared E&S instruments at the state, Local Government Areas (LGA) and community levels.
12.	SEPA/SWMAs	The SEPAs shall enforce environmental regulatory compliance at the state levels respectively. Statutorily, they are mainly responsible for ensuring the overall protection of various aspects of the built, physical and biological environment by ensuring limits set by the FMEnv are not exceeded during development works, also ensure that developments meet environmental requirements, e.g. proper siting, air, noise, water quality monitoring etc. As regards RAAMP-SU, they shall coordinate with the SPIUs as required and as well with Consultants, Supervisory Consultants, and Contractors during the preparation of E&S instruments and implementation of subprojects/intervention works respectively. The SEPAs may be directly involved in waste management activities, however, in some states the responsibility for waste management is handled by the SWMAs. Generally, at the state level, the SWMAs undertake the task of providing guidelines for enforcing proper waste management procedures. In some instances, the SWMAs may have designated dumpsites for specific types of waste and guide the process for waste conveyance to the dumpsites by waste generators or procure the services of licensed waste collection vendors to carry out the services of waste collection, treatment and final disposal. SPIUs shall leverage on the relationships with SWMAs to assure that environmentally sound and socially accountable management of waste is a primary requirement during the implementation of civil works.

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S/N	Organizations	ESMF Roles and Responsibilities
13.	RARAs	The state RARAs will be very effective in the operation phase of the implementation of this ESMF by carrying out road maintenance across the RAAMP-SU states.
14.	Other Interested Parties	Stakeholder identification for technical support MDAs shall be a continuous process in the implementation of the ESMF as well as during the preparation of requisite E&S instruments. In this regard, other interested parties may be identified and found to be relevant for ESMF implementation as further stakeholder engagement continues either at the federal or state levels. Such parties based on their statutory mandate shall be assigned appropriate responsibilities depending on their relevance to aspects of ESMF implementation i.e. Physical Cultural Resources, Biodiversity etc.
<b>Non-Governmental Organizations</b>		
1.	CSOs, NGOs, CBOs and Other Interested Parties.	At national level and sub-national levels when properly engaged by the project (through stakeholder engagements and consultations), CSOs, NGOs and CBOs could drive sensitization and awareness programs on rural development, labour influx, community health and safety, SEA/SHGBV, etc.
2.	The World Bank	The World Bank has overall responsibility to ensure that its ESF and ESSs are complied with. In addition, the Bank will be responsible for the final review and clearance of ESMF; as well as the giving of a "no objection" to the Terms of Reference for E&S instruments (ESMPs, ESIAs, GAP, RPF, RAPs, LMPs, SRAs, SMPs, etc.).

### 8.1.2 Consultants

Consultant(s) will be procured by the FPMU and SPIUs to undertake the preparation of required E&S instruments; and/or other requisite reports (if needed). They will liaise with the E&S Technical Assistance (TAs) Consultants and E&S Officers of the FPMU and SPIUs respectively. Consultants may also be required to conduct capacity building on ESMF implementation and/or implementation of management plans described in E&S instruments.

### 8.1.3 Contractors

Contractors shall keep to all environmental and social clauses established in the bidding documents and contract agreements. They shall sign the Code of Conduct and comply with their mitigation responsibilities for E&S risks and impacts as provided in the E&S assessments (e.g. ESMPs) including their respective CESMPs. In order to enable successful implementation of the ESMF including provisions furnished in disclosed E&S assessments, Contractors shall include E&S and GBV focal persons as part of their work force; as well as an OHS/Community, Health, Safety, Environment and Security officer or manager. Additionally, Contractors shall comply to the LMP provisions to drive ESMF implementation.

### 8.1.4 Supervisory Consultants

Supervisory Consultants shall be responsible to monitor, keep in check, ensure quality assurance and optimal delivery of the Contractors contract. Their E&S responsibilities will require monitoring mitigation measures ascribed to Contractors, review of the CESMP, verification of signed CoCs etc. They shall also be part of the actors required to implement and monitor some of the management plans captured in this ESMF. Similar to Contractors, Supervisory Consultants shall include E&S and GBV focal persons as part of their work force; as well as an OHS/Community, Health, Safety, Environment and Security officer or manager.

## 8.2 RAAMP-SU Project Implementation Arrangement

The institutional and implementation arrangements of RAAMP-SU will follow those of the parent project RAAMP. The FPMU, under the FMAFS and the SPIUs, will be responsible for implementation of project activities at the federal and state levels, respectively. The FPMU is well established at the federal level, while 19 participating States on the parent project have established SPIUs with staff of varied competencies. RAAMP-SU will continue to build capacity in rural road planning, development, maintenance and management, ESF, fiduciary and monitoring, and evaluation (M&E) at both the FPMU and SPIUs levels. One of the criteria for States to participate in the Scale-up to is to have a well-established SPIU office with technically qualified staff required to manage the project. The parent project would provide technical support to new States to establish their respective SPIUs, including in-house training of staff by the FPMU. However,

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under the RAAMP-SU, it is proposed for SPIUs to be embedded within the RARA. A major limitation to this proposal is that based on findings in the course of preparation of this ESMF, some states while having passed the laws for the setup of RARAs and implementation of the SFR, are yet to establish the agency. Nonetheless, some states have established their RARAs while others have established similar agencies with jurisdiction over both urban and rural roads for example Kano Road Traffic Agency (KAROTA) and Road Traffic Department, Anambra State Road Maintenance Agency (ARMA) and Enugu State Road Maintenance and Development Agency. The FPMU and SPIUs will be led by a National Coordinator (NCR) and State Project Coordinators (SPCs) respectively.

The existing implementation arrangement for the parent project (RAAMP) according to the Project Implementation Manual (PIM) is described in Table 33 below.

**Table 33: Implementation arrangement for the parent project according to the PIM**

Institution	Main Role
<b>Federal Level</b>	
Federal Ministry of Finance (FMoF)	<ul style="list-style-type: none"> <li>• Interlocutor of multilateral and bilateral financing agencies in Nigeria; and</li> <li>• Advise the World Bank on the account details and authorized signatories.</li> </ul>
Federal Ministry of Agriculture and Food Security (FMAFS)	<ul style="list-style-type: none"> <li>• Lead ministry of RAAMP implementation.</li> </ul>
National Technical Steering Committee (NTSC)	<ul style="list-style-type: none"> <li>• Chaired by the Permanent Secretary (PS) of FMAFS and will meet every quarter, or more often if required;</li> <li>• Overall strategic and policy guidance on all activities supported under the project;</li> <li>• Coordination of project activities among the participants and the removal of any obstacles to the implementation of the project; and</li> <li>• Ensuring strategic monitoring and oversight of the project implementation.</li> </ul>
Federal Project Management Unit (FPMU) [under the FMAFS]	<ul style="list-style-type: none"> <li>• Led by a National Coordinator (NCR);</li> <li>• Overall project coordination role;</li> <li>• Overseeing and guiding the overall administration of procurement, environmental and social safeguards management, and communication of the project;</li> <li>• Carrying out overall coordination, supervision, monitoring and evaluation of project activities;</li> <li>• Providing technical and capacity building support to prospective states;</li> <li>• Engaging an independent technical audit firm to support quality assurance and comprehensive technical auditing tasks; and</li> <li>• Reporting to the NTSC; and Communication, coordination and reporting with development partners.</li> </ul>
Office of the Accountant General of the Federation (OAGF)	<ul style="list-style-type: none"> <li>• Oversight function of Federal Project Financial Management Department (FPFMD);</li> <li>• Ensuring deployment of qualified and adequate financial management staff from the accounting unit of FPFMD, to be responsible for financial management of the project; and</li> <li>• Ensuring deployment of qualified and adequate financial management staff from the internal audit unit of FPFMD, to perform internal audit functions.</li> </ul>
Federal Project Financial Management Department (FPFMD)	<ul style="list-style-type: none"> <li>• Financial management of federal level activities;</li> <li>• Responsible for the preparation of project budgets, monthly reports, interim unaudited financial reports, and annual financial statements covering all project activities with inputs from the state PFMs;</li> <li>• Application of managerial, financial, operational and budgetary controls including conduct of the internal audit of the federal level activities;</li> <li>• Arranging for and coordinating external audit for the project</li> </ul>
<b>State Level</b>	
State ministry or entity in charge of rural roads/rural transport (State Ministry of Agriculture and Rural Development or State Ministry of Public Works or MDA depending on the state).	<ul style="list-style-type: none"> <li>• Anchor ministry or entity for RAAMP implementation at state level.</li> </ul>

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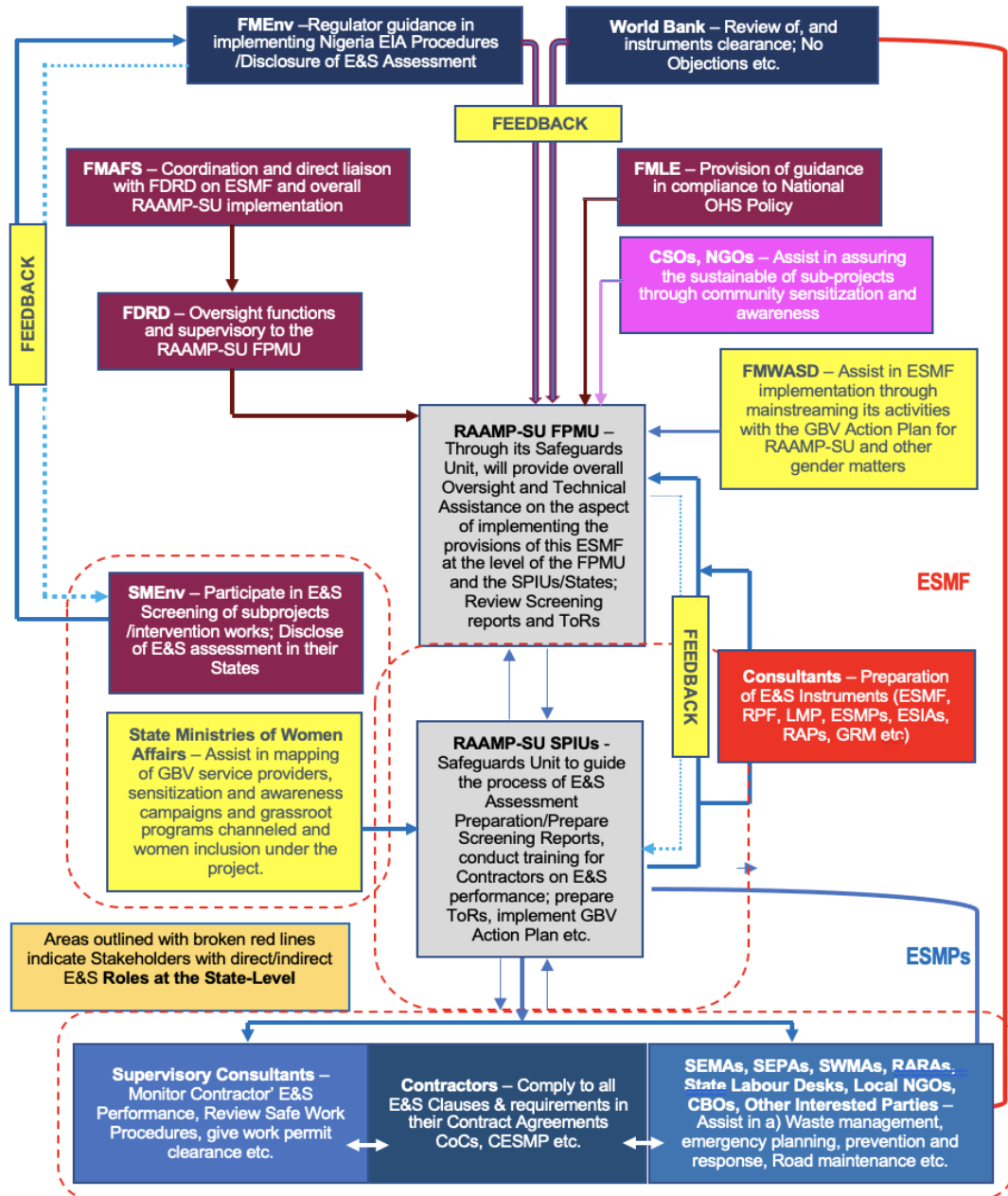
Institution	Main Role
Any other technical ministries or MDAs	<ul style="list-style-type: none"> <li>To provide technical support to the implementation of RAAMP at state level.</li> </ul>
State Project Monitoring Committee (SPMC)	<ul style="list-style-type: none"> <li>Chaired by the Permanent Secretary (PS) of the supervising/ anchored ministry;</li> <li>Overall monitoring of the project activities in the state;</li> <li>Overall strategic, policy guidance and oversight of all project activities within the state; and</li> <li>Facilitating the coordination of activities and the removal of any obstacles to the implementation of the project.</li> </ul>
State Project Implementation Units (SPIUs)/Anchored at ministries, departments and agencies (MDAs)	<ul style="list-style-type: none"> <li>Led by a State Project Coordinator (SPC);</li> <li>Ensuring technical management of the project within the state in accordance with the agreed engineering, safeguards and fiduciary standards; and</li> <li>Overall planning, administration of procurement, environmental and social safeguards management, and communication related functions of the project within the state;</li> <li>Monitoring and evaluation of the project within the state;</li> <li>Reporting to the SPMC and the FPMU on the status of the project implementation; and</li> <li>Implementation of any guidance provide by SPMC.</li> </ul>
Office of the Accountant-General of the State (OAGS)	<ul style="list-style-type: none"> <li>Oversight State Project Financial Management Unit (SPFMU); and</li> <li>Ensuring the deployment of qualified and adequate staff from the accounting and internal audit units to the SPFMU.</li> </ul>
Project Financial Management Unit (PFMU)	<ul style="list-style-type: none"> <li>Financial management of the project within the state;</li> <li>Preparation of budgets, monthly reports, interim unaudited financial reports, and annual financial statements covering state activities; and</li> <li>Conducting internal audit of the state level activities.</li> </ul>

### 8.3 Institutional Arrangements for ESMF implementation in RAAMP-SU

The institutional arrangements for RAAMP-SU ESMF implementation as presented in Tables 34 and 35 above (Sub-section 8.1.1), take into note, the importance and relevance of all critical and major stakeholders concerned with the environment, social development, occupational health and safety, community health and safety etc. in relation to coordinative management of envisaged E&S risks and impacts associated with RAAMP-SU implementation as a whole. The actions to be taken by all actors are expected to ensure that the requirements of ESSs 1-6; 8 &10 are met throughout ESMF implementation. The organogram for the institutional arrangement for this ESMF implementation is described in Figure 17 below.

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**ESMF** – To be implemented throughout RAAMP-SU implementation nationally and sub-nationally.  
**ESMPs** – To be implemented during the implementation of sub-projects/intervention works. Mitigation measures for E&S risks and impacts shall be carried out by responsible institutions identified in the respective E&S assessment prepared for the sub-project.

Figure 17: Institutional arrangement for this ESMF implementation

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### 8.3.1 During Project Implementation

RAAMP-SU implementation will encompass a range of activities, subprojects and intervention works proposed under all Components of the project (Components A, B, C, and D). Specifically, the majority of activities during project implementation will revolve around upgrading 3000km of rural roads, implementing rehabilitation works for climate resilience and flood protection (such as repairing and reinforcing old bridges and culverts, slope stabilization etc.) under Component A1; maintaining 3,500 km of rural roads under Component B1; third-party monitoring for SEA/SH, gender, grievance redressal and rural road safety of rural roads under Component C2; and Contingent Emergency Response under Component D amongst others. This necessitates active involvement of the institutions identified for ESMF implementation such that broad E&S concerns are managed throughout the project and required plans/strategies needed for sustainability of the project implemented (e.g. GBV action plan, SMP, RPF, LMP, ESMPs, RAPs etc.). Institutions and organizations that will be actively involved in ESMF implementation will include but not limited to FPMU, SPIUs, Consultants, Supervisory Consultants, Contractors, SEPAs, SWMAs, etc. The FMEnv, FMWA, FDRD, and others described in Tables 32 above, shall be involved depending on the level of engagement required.

### 8.3.2 Post Project Monitoring Period

At this stage, it is assumed that most RAAMP-SU Components' activities may have been completed and are undergoing performance review, monitoring and evaluation. In the context of ESMF implementation, civil works and subproject activities may have been completed during this period and probably in their defect liability period (especially for roads). Since the states shall be directly responsible for implementation, monitoring plans captured in E&S instruments shall present site-specific directives on monitoring responsibilities, whereas the monitoring framework for E&S risks and impacts captured in this ESMF (See Chapter 6, Section 6.10 and 6.11) will provide guidance to the FPMU, SPIUs and other institutions responsible for E&S monitoring. Organizations and institutions involved during this phase will include particularly those with statutory responsibilities for monitoring, performance review, maintenance, corporate social responsibility, operations etc. Notable organizations will include RARAs, CSOs, NGOs, SPIUs, FPMU (which will review monitoring reports of the states), and the World Bank (which will plan implementation support missions and mid-term review). Consultants procured for the purpose of performance evaluation, E&S audits, etc. will also play roles during the post project monitoring period.



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# CHAPTER 9 – STAKEHOLDER ENGAGEMENT AND DISCLOSURE

## 9.1 Requirements of ESS 10: Stakeholder Engagement and Information Disclosure for RAAMP-SU

ESS 10 (Stakeholder Engagement and Information Disclosure) requires that Borrowers will engage with stakeholders throughout the project lifecycle. This engagement shall commence as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. Additionally, ESS 10 requires that the nature, scope, and frequency of stakeholder engagement is proportionate to the nature and scale of the project and its potential risks and impacts. To this effect, RAAMP-SU has prepared a Stakeholder Engagement Plan (SEP) consistent with ESS 10. The SEP shall guide consultation processes throughout the implementation of RAAMP-SU, it will continuously identify new stakeholders and will be updated as need be. Stakeholder engagement is an inclusive process. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. For this reason, stakeholders' engagement for RAAMP-SU must be started early in the project as it guarantees the obtainment of 'Social License to Operate (SLO)' by signaling to communities and other local stakeholders that their views and well-being are considered important. The sections that follow shall detail the methodology, tools and outcomes of consultations with key stakeholders in the course of preparing this ESMF as well as the procedure for future stakeholder engagements to be carried out during RAAMP-SU implementation. The procedure for information disclosure for the project shall also be provided in the subsequent sections.

## 9.2 Stakeholder Engagement and Information Disclosure (ESS 10)

### 9.2.1 Objectives of the Consultations

In line with the objectives of ESS 10, the specific objectives of the consultations carried out for the RAAMP-SU ESMF are as follows:

- To establish a systematic approach to stakeholder engagement that will help RAAMP-SU identify stakeholders/PAPs and build and maintain a constructive relationship with them.
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project lifecycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow RAAMP-SU to respond to and manage such grievances.

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### 9.2.2 Methodology and Tools for the Consultation

Considering that specific project sites where sub-projects/intervention works will be implemented have not yet been determined, the consultation and public engagement process for developing the ESMF was limited to the FPMU, SPIUs, RARAs, Federal and State-Level Implementing MDAs, both at the existing and new states, Local Communities, Road Users, etc. Consultations with potential Project Affected Persons (PAPs) directly impacted by RAAMP-SU implementation in prospective states will be conducted in the project communities' once sites are identified and selected. As part of the stakeholder engagement process, a stakeholder mapping was conducted in collaboration with the FPMU prior to consultation meetings.

The following steps were taken for the stakeholders' engagement process

- a) Identification of Stakeholders
- b) Prioritization of Stakeholders
- c) Understanding the Identified Stakeholders and their areas of influence/interest
- d) Mapping of Stakeholders

The stakeholder engagement process is provided in Table 34 below.

**Table 34: Stakeholders Engagement Process**

S/N	Key Stakeholder Engagement Activities	Stakeholders Identified	Level of Influence on the Project
	<ul style="list-style-type: none"> <li>✓ Desktop study, Literature reviews on RAAMP-SU Prospective States and the FCT; program area of influence</li> <li>✓ Mapping of primary stakeholders (specifically interested Parties)</li> <li>✓ Initial identification of stakeholders in association with rural development, agriculture, state infrastructure projects</li> <li>✓ Introductory stakeholders' engagement and meetings for discussions and feedback on relevant rural access, transportation, agriculture, community and local issues, including grievance redress, Gender Based Violence (sexual harassment and SEA) and opinions from Civil Society Groups</li> </ul>	RAAMP-SU FPMU	The influence of the FPMU on the project extends to overall project management and oversight.
		RAAMP-SU SPIUs	Implementation of RAAMP-SU at the state level and coordination with relevant MDAs
		FMEEnv	The FMEEnv is the apex regulatory ministry, overseeing issues of environmental management in the country. Through its EA department, the FMEEnv shall provide advisory and decision making on in-country E&S procedures necessary to be adopted by RAAMP-SU.
		FMLE	It shall provide advisory services on land acquisition, land use, and land management practices that align with RAAMP-SU objectives.
		FMWA/SMWA	It shall provide advisory services on gender mainstreaming, and GBV/SEA issues. It shall ensure that the project incorporates gender considerations and support in monitoring the RAAMP-SU social performance and advocate for the integration of social development best practices.
		SEPA/SMEEnv	Influence the enforcement of regulations guiding the E&S screening of sub-projects/intervention works. Are critical for disclosure of the ESMF and subsequent E&S assessments in the respective states.
		State Ministry of Agriculture	Being that the RAAMP-SU project is domiciled with FMAFS, the state ministries of agriculture are an unarguably important stakeholders in the sense that part of the goals of the RAAMP-SU is to increase access to markets and transportation of agro-products. The ministries are essential in leading the regulatory framework in their states which supports the aforementioned goals.
		Ministry of Rural Development	Responsible for policy formulation which supports rural and development projects in their states. Additionally, they coordinate and provide technical supports to co-operatives within the corridors of prospective locations

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			for sub-projects/intervention works to be carried out by the states.
		NEMA/SEMA	NEMA/SEMA will provide supportive coordinating responsibilities to the FPMU/SPIU in the event of emergencies and natural disasters.
		Civil Society Organizations (CSOs)	For social inclusion, advocacy, sensitization, community liaison.

*It should be noted that not all states have SPIUs currently. States without SPIUs are being evaluated based on their E&S capacities to determine their readiness to support RAAMP-SU implementation. The FPMU is as well providing support in the structuring of the SPIUs in such state.*

Consultations for the ESMF involved a combination of virtual meetings and physical consultations, taking into account the “**Public Consultations and Stakeholder Engagement in WB-supported Operations when there are Constraints on Conducting Public Meetings**” (such as insecurities in some of the states). The major tools/steps followed included i) permitting smaller meetings, and conducting consultations in small-group sessions, such as focus group meetings ii) conducting meetings through GSM phone conference calls, online channels, Zoom and Google Meet and iii) creation of online chat groups appropriate for the purpose, based on the type and category of stakeholders. Furthermore, a questionnaire to enable stakeholder engagement and information gathering from MDAs and SPIUs was developed for the purpose of this ESMF. The rationale for the questionnaire is to provide support to the Consultant’s inquisition on delicate subject matter from a state-based point of view necessary for preparing the ESMF and ensuring it captures significant issues. The schedule for these engagements is outlined in Table 35 below.

**Table 35: Stakeholder Engagement Schedule for the ESMF.**

Schedule	Consultation Type	Stakeholders
20 <sup>th</sup> – 22 <sup>th</sup> March, 2024	Virtual Meetings	FPMU, SPIUs, Implementing MDAs,
25 <sup>th</sup> March – 2 <sup>nd</sup> April, 2024	Physical Consultations	FMEnv, FMLE, FMWA. SPIUs, RARAs, Implementing MDAs, Local Communities, Road Users, etc.

The comprehensive discussion including concerns and responses by the stakeholder and consultant are extensively documented in Annex 20 Nonetheless, a summary of the outcomes of the stakeholder engagements are provided in Section 9.2.3 below.

### 9.2.3 Outcomes of Consultation Meetings

The summary of major issues and concerns raised by the stakeholders based on the public consultations are provided below.

**Table 36: Outcomes of Consultations Meetings with RAAMP-SU Stakeholders**

Stakeholder Group	Major Issues, Concerns and Contributions
Federal Ministry of Environment (FMEnv)	<ul style="list-style-type: none"> <li>The consultation with the FMEnv yielded invaluable insights into the intricacies of the E&amp;S screening process. Updates on relevant regulatory frameworks were shared, with the Deputy Director of the Department of Environmental Assessment confirming changes in Nigeria's EIA procedures and charges as of 2021. Notably, adjustments were made to charges for screening, scoping, and registration of environmental social assessment.</li> <li>In the aspect of participation in E&amp;S assessments, it was clarified that FMEnv's involvement would stem from state ministry teams rather than directly from the federal team.</li> </ul>
Federal Ministry of Labour and Employment (FMLE)	<ul style="list-style-type: none"> <li>The 2020 revision of the National Policy on OHS was discussed, along with ongoing efforts to develop Road Construction Safety Regulations. The</li> </ul>

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Stakeholder Group	Major Issues, Concerns and Contributions
	<p>FMLE expressed readiness to support RAAMP-SU in labour and worker management during civil works implementation.</p>
SPIUs	<ul style="list-style-type: none"> <li>• Consultations were held with the SPIUs of the RAAMP-SU Prospective States (where available) and it was observed that most of the states already have a functional SPIU under RAAMP and the SPIUs have experience in preparing E&amp;S instruments. However, some SPIUs are yet to set up project offices and procure office equipment.</li> <li>• There is synergy with all RAAMP-SU implementing MDAs in most states, fostering collaboration and coordination in project management and E&amp;S monitoring of the project, while some states have poor synergy with relevant MDAs e.g. Abia, Bauchi, Zamfara, etc.</li> <li>• There has been little or no capacity-building for the SPIUs and MDAs specifically on the ESSs across most states, hence the need for future capacity building in this area.</li> <li>• While states like Taraba, Adamawa, Bauchi, Nasarawa have absence of policy or regulatory frameworks on environmental and social development in the state, states like Anambra, Enugu, Jigawa, Kano, etc. had policies or regulatory frameworks yet there is still a huge divide between the availability of laws and policies, and their implementation and enforcement.</li> <li>• In Edo, Jigawa, Plateau, Zamfara there is gender imbalance in the project participation, indicating a need for strategies to enhance female involvement in project implementation and decision-making processes.</li> </ul>
RARAs	<ul style="list-style-type: none"> <li>• Consultations with the SPIUs further revealed that while some states (Adamawa, Akwa Ibom, Bauchi, Ekiti, Jigawa, Kaduna, Kano, Kebbi, Kogi, Niger, Ogun, Ondo, Oyo, and Plateau states) have passed the bill to establish RARA, they are still awaiting their inauguration. In states where the RARAs have not been established, there are variations in their structure and function, with some states having separate agencies like the Road Maintenance Agency (Anambra) and Road Traffic Agency (Kano). The agencies have been established to take ownership of road rehabilitation projects in the states.</li> </ul>
SMEnvs	<ul style="list-style-type: none"> <li>• The consultation with the SMEnvs revealed that most SMEnvs do not have specific policies on environmental management but they leverage on the EIA CAP E12 LFN, 2004. For every project, EIA is always conducted and the EIA always includes the health and safety of the workers and community. Management of environmental risks in development projects is handled by the ecological department, environmental assessment department etc.</li> <li>• The representatives of the SMEnvs buttressed the need for inclusion of the SMEnvs at all phases of the project.</li> </ul>
NEMA	<ul style="list-style-type: none"> <li>• The consultation with NEMA revealed that while there are standard procedures for accidents and emergency management, there is no specific protocol tailored to the road construction sector.</li> <li>• NEMA employs a multisectoral approach to disaster risk management, coordinating with various organizations. Specific plans like the National Disaster Response Plan; and Search, Rescue, and Epidemic Response Plan are in place for emergencies across different sectors including road accidents, aviation building collapse, and others.</li> <li>• They expressed their optimism for the RAAMP-SU and informed of their readiness to support its successful implementation. Furthermore, they solicited that the RAAMP-SU maintains an open channel of communication and continuously engage them whenever they require their services.</li> </ul>

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Stakeholder Group	Major Issues, Concerns and Contributions
SEPA/SWMA	<ul style="list-style-type: none"> <li>The consultation with SMWAs revealed that, while there are waste management frameworks in place in the all states, these frameworks do not adequately cover waste management in rural communities. Each state has its waste management agency, with varying practices such as incineration and landfill use.</li> </ul>
SEMA	<ul style="list-style-type: none"> <li>The consultation with the SEMAs revealed that some states have established local government emergency management committees in various LGAs. These committees comprise of various stakeholders from the communities.</li> <li>Furthermore, committees respond to disasters and receive training from SEMA to handle local emergencies effectively. Additionally, compensation is provided to affected individuals. However, this compensation is for natural disasters and not man-made errors.</li> </ul>
State Ministries of Works	<ul style="list-style-type: none"> <li>Consultations with state Ministry of Works revealed that it is part of their responsibilities to be involved in the construction of rural road networks, control flood and erosion etc. They expressed excitement that the objectives and components of RAAMP-SU aligns with some of their functions and voiced their willingness to partake in the implementation of the project.</li> <li>Some states such as Imo state have Area Engineers who represent LGAs in the State. These engineers specialize in rural roads and have extensive knowledge of their respective LGAs, particularly roads that are in poor condition and near major farms. Utilizing their expertise, they could play a valuable role in the road selection process by offering insights on roads that are very important to local communities. The ministries emphasized the need for continued engagement and inclusion of the ministry in all phases of RAAMP-SU.</li> </ul>
State Ministries of Land	<ul style="list-style-type: none"> <li>In the RAAMP-SU Prospective States, the ministries of lands expressed familiarity with compensation matters related to land issues. They emphasized the importance of adhering to proper protocols during the implementation of RAAMP-SU. This includes conducting consultations with various stakeholders such as community leaders, district heads, and youth chairmen. This approach ensures that all parties involved are aware of the process and their rights, thereby promoting trust and cooperation.</li> </ul>
State Ministries of Women Affairs	<ul style="list-style-type: none"> <li>Consultation with SMWAs revealed that the ministry is very involved in managing social risks associated with the inclusion of women and vulnerable groups as beneficiaries in development projects, as well as addressing GBV risks in the states.</li> <li>The ministry employs social welfare and/or community development officers stationed at various area offices across the LGAs. These officers collaborate with communities to enhance the initiatives of both the Local Government and the Ministry of Women Affairs.</li> <li>Particularly, most SMWA collaborate with NGOs/CBOs to achieve their goals. It was also revealed that most SPIUs have good synergy with the SMWAs, for which most GBV officers in the SPIU are representatives from the ministry.</li> </ul>
Communities	<ul style="list-style-type: none"> <li>The communities appreciated RAAMP-SU and expressed their optimism and acceptance of the project.</li> <li>Stakeholders have raised concerns about their exclusion from the decision-making process regarding the selection of sub-projects or intervention works within their communities during past projects. This absence of involvement has led to the development of rural road infrastructure that fails to address the specific needs of certain communities, especially when</li> </ul>

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Stakeholder Group	Major Issues, Concerns and Contributions
	<p>compared to other roads. Additionally, PAPs have noted that access roads leading to project sites, such as those for culvert and bridge installations, are often in poor condition and inaccessible. Despite this, these access roads are overlooked and not given priority for rehabilitation.</p> <ul style="list-style-type: none"> <li>Stakeholders highlighted the importance of conducting thorough and timely consultations before the implementation of sub-projects or intervention works. This is to ensure that communities are fully informed about the proposed timeline for the commencement of civil works. By doing so, communities can make necessary arrangements and adjustments to their farming activities or other livelihoods, minimizing potential disruptions and conflicts.</li> <li>During consultations, community heads and youth chairmen highlighted the importance of providing employment opportunities for the local youth during the implementation phase of the project.</li> <li>Communities in the southern states, with a particular focus on flood-prone states like Bayelsa, Delta, and Rivers, have strongly advocated for the timely completion of road rehabilitation projects before the onset of the rainy season. According to the elders of these communities, as soon as the rainy season commences, many of their communities become cut off from basic services such as healthcare, education, and marketplaces.</li> <li>Grievances across communities are handled by their local leaders and traditional rulers, constituting mostly of a secretary, treasurer, youth leader and other council members from within the community. Grievances that cannot be solved amongst grieving parties are usually brought before the council. The aggrieved party also has the option of seeking redress through the courts if he/she is not satisfied with the decision of the local council.</li> </ul>

### 9.3 Consultations and Communication Guideline (ESS10)

In line with the requirements of ESS 10, RAAMP-SU will undertake regular and continuous engagement with the stakeholder groups identified in accordance with the SEP developed for RAAMP, throughout the project lifecycle. This will involve consulting and liaising with communities and stakeholders during sub-project implementation, conducting extensive consultations with the direct Project Affected Persons (PAPs) at the grassroots level, and engaging with institutional stakeholders during future E&S assessments. Information disclosure will be geared around the planning and preparatory stages of the project to ensure sustainability of the project design through the capture and inclusion of PAP opinions (where necessary), in order to achieve outcomes consistent with ESS 10. SPIUs of the RAAMP-SU Prospective States will build upon the channels of communication and engagement already established with stakeholders by virtue of this ESMF. Future consultations will adhere to the principles of Free, Prior and Informed Consent (FPIC), ensuring an accessible and unrestricted engagement process accompanied by timely disclosure of relevant and understandable information. In particular, the RAAMP-SU will seek feedback from stakeholders on the environmental and social performance of the project. The framework for the future consultations with project communities is presented in section 9.3.1.

#### 9.3.1 Community Engagement and Stakeholders Participation (ESS10)

Table 37 below provides a guideline for future community consultations.

**Table 37: Guideline for Future Community Engagements.**

Description	Objective/Purpose	Responsibility	Time/Period	Location
Consultations with communities and other stakeholders	<ul style="list-style-type: none"> <li>Information dissemination;</li> <li>Obtainment of Social Licence to Operate (SLO);</li> </ul>	SPIUs (Communication Specialist,	During Project Implementation	Project coverage areas (selected sites where



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Description	Objective/Purpose	Responsibility	Time/Period	Location
during project implementation	<ul style="list-style-type: none"> <li>Building confidence and a sense of ownership;</li> <li>Sensitization and creating awareness about risks and impacts;</li> <li>Minimizing conflicts and frictions.</li> </ul>	Safeguards Unit, etc.); Contractors.		proposed sub-projects/ intervention works will take place).
Consultations with communities and other stakeholders during future E&S assessments for identified sub-projects/intervention works.	<ul style="list-style-type: none"> <li>Identify and understand potential E&amp;S risks and impacts of sub-projects from the community's perspective.</li> <li>Share information about the project, including its objectives, potential impacts, and mitigation measures.</li> <li>Disclose and seek feedback and input from the community on the project's design, implementation, and potential alternatives.</li> <li>Incorporate community feedback and concerns into the project's decision-making process and design, leading to more socially and environmentally sustainable outcomes.</li> </ul>	E&S Consultant; SPIUs (Safeguards Unit).	<p>During E&amp;S assessment</p> <p>During E&amp;S assessment (once draft the draft report is available for discussion and feedback) before submission to Bank for clearance.</p>	Consultation meeting at all selected Sites; FGD at all selected sites
Consultations with communities	Liaison with communities and project beneficiaries	SPIUs, RARAs, etc.	Post Project Period	As and when necessary

### 9.3.2 Citizen Engagement

The RAAMP-SU project will adopt and implement a robust citizen engagement activity throughout the project implementation and across all the project components. All sub-project activities will be implemented while including consultations with the beneficiaries at the community level including women, persons with disabilities, other vulnerable groups and ethnic minority groups to ensure full participation in the process of selection and design of the local interventions. The citizen engagement process will align with the Stakeholders engagement plan and will ensure equal access for women and other vulnerable groups, and their equal participation in the project activities. To improve beneficiaries' participation, a beneficiary satisfaction survey will be conducted annually to measure quality of participation and to close the feedback loop.

### 9.4 Grievance Redress Mechanism (GRM)

A GRM is an accessible and inclusive system, process, or procedure that receives and acts upon complaints and suggestions for improvement in a timely fashion and facilitates resolution of concerns and grievances arising in connection with a project. An effective grievance mechanism provides project-affected parties with redress and helps address issues at an early stage. RAAMP-SU shall operate with the Beneficiary Feedback and Grievance Redress Mechanism (BF&GRM) prepared for the parent project to address grievances from PAPs as a result of environmental and social issues arising from civil works implementation at the prospective states. However, where there are changes during subproject/intervention works implementation, the RAAMP BF&GRM may be updated to capture and reflect these changes. Specifically, civil works related disputes, complaints and grievances will emanate from the implementation of components A and B of the RAAMP-SU project. SPIUs of the prospective states will ensure that grievance redress procedures are in place and would monitor those procedures to ensure that logged in grievances are handled and redressed properly with effective feedback mechanisms.

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### 9.4.1 The RAAMP-SU GRM Structure

The RAAMP-SU shall adopt the GRM structure of the parent project to manages complaints and grievances that will arise during sub-projects/intervention works implementation. This GRM structure includes a six-step approach: **a) Uptake; b) Sort and Process; c) Acknowledge and Follow Up; d) Verify, Investigate and Act; e) Monitor and Evaluate, and f) Provide Feedback to the Complainant.** GRCs will be established at different project levels, starting at the community level, to ensure local ownership and resolution of disputes. These committees will be formed with the assistance of the SSO and the technical assistants. GRCs will also be established at the SPIUs and at the FPMU. Project stakeholders and affected persons will be notified of the escalation process for unresolved issues to judicial redress, although efforts will be made to resolve cases at the lowest level possible. The SSO at the SPIU will handle serious grievances received directly or through the community-based GRC. However, initial handling and recording of complaints will primarily occur at the community level. If issues remain unresolved, the SPIU serves as the next level of appeal. If the SPIU cannot resolve a project-related dispute, the grievance is then escalated to the [State Citizens Mediation Center \(SCMC\)/State Project Steering Committee](#). **If the grievance is not resolved at this level, it is channeled to the FPMU** for guidance on further action. Figure 18 below shows the Schematic Showing the Levels of GRC for RAAMP-SU.

### 9.4.2 Composition of Local/Site Specific GRC (Community Level)

The first level of GRC is formed at the communities, easily accessible to community members, the village head, and women's representatives, etc. This committee will report to the SPIU through a **Community Grievance Focal Person**. Communities where civil works will be implemented under RAAMP-SU shall nominate up to ten individuals to form a community-based GRC, including representatives from: **a) Traditional Leaders, b) Opinion Leaders or Influencers, c) Women, d) Youth, e) Community Grievance Focal Person, F) Minority Group(s) within the Community, such as Non-Indigenous Settlers.** The responsibilities of the community based GRC are summarized below.

- Receive, acknowledge and register complaints presented at the community level.
- Settle project related disputes at community level.
- Operate dedicated telephone hotline(s) for complaints.
- Project information dissemination.
- Coordination of town hall meetings and other stakeholder engagements.

Grievances logged in at this level shall be addressed within 5 days from its receipt.

### 9.4.3 Composition of the GRC at the RAAMP-SU SPIU

The second level of redress is at the SPIU. This committee shall comprise of SPIU members including the Project Coordinator, Social Safeguard Officer, etc. and other state level representative from within the State Project Monitoring Committees (SPMC). If the complainant does not accept the solution offered by the SPIU-GRC, then the complaint is referred to the SPMC. The GRC to be established within the SPIU, shall be chaired by the Social Safeguards Specialist, and will comprise of the following:

- State Project Coordinator
- SPIU Social Safeguard Officer
- SPIU Environmental Safeguards
- SPIU GBV Officer
- SPIU Communication Specialist

**The SPIU GRC shall be responsible for:**

- Coordinating the entire grievance mechanism at the state level;
- Resolving disputes that are within their power or control;

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- Making recommendations for action to the GRC at the FPMU in the case of issues of extreme importance or urgency;
- Offering the interested parties, the option of referral to the Citizens' Rights/Mediation Centre under the respective state Ministry of Justice or sharia courts in some cases. This feedback to the complainant shall be done through the relevant community-based GRC in the case of grievances that are either unresolvable at the FPMU level or found at the SPIU level to be extraneous to the execution of the RAAMP; and
- Provide adequate resources to offset operational administrative costs of the community based GRCs

### 9.4.4 State Citizens Mediation Center (SCMC)/ State Project Steering Committee

This will depend on the structure that is applicable to each state.

#### Roles and Responsibilities of State Citizens' Rights/Mediation Centers

- Settle disputes that are referred from SPIU – Document Terms of Settlement (TOS) of cases referred to it
- Second arbitrators to Community-based GRC sessions upon request by the SPIU Social Safeguard Specialist.
- The RAAMP GRM will be integrated into the existing SCMC and shall use existing arrangements and SOP. If disputes cannot be resolved by the SCMC GRC, the case will be referred to the FPMU GRC within 5 days.

### 9.4.5 Composition of the GRC at the RAAMP-SU FPMU

The FPMU which forms the fourth level of GRM will be required to intervene in grievances beyond the state level resolution.. The main roles of the FPMU GRC are to;

- oversee the operations of the GRMs in the various prospective states
- allow affected parties, who are unhappy with how their complaint has been handled by the first, second and third tiers GRCs to apply for a reconsideration of their cases and,
- E&S feedback or issues that has not been handled by and filed directly to the SSO, Community based GRCs, GRCs, SPIU and, SCMC.

The FPMU GRM shall consist of the following members:

- the National Coordinator, RAAMP-SU
- FPMU Social Safeguard Officer (GRM Coordinator)
- FPMU Environmental Safeguard Officer
- FPMU GBV Officer
- FPMU Communications Officer

This committee shall receive monthly reports on status of disputes/complaints from the SPIU GRC and shall provide approvals or guidance on action items in the report. Court Redress can be sort where the aggrieved party is not satisfied with the judgement given by the GRC at the FPMU level, and the SPIU must inform them of their rights to seek redress as the final resort in the court of law.

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Figure 18: Schematic Showing the Levels of GRC for RAAMP-SU.

### 9.5 Communication and Consultation Strategy (ESS 10)

The communication plan for RAAMP-SU have already been provided in the SEP prepared for RAAMP. It shall be driven by citizens engagement tools and include the use of tools like town hall meetings, toll-free lines, radio programs (in local languages), Phone-in, etc. Mobile apps shall also be created according to the need of the stakeholders. These tools aim to ensure project acceptance and maximize impact through active and passive engagement. Key channels include the project website, social media, workshops, training sessions, webinars, surveys, and press releases. The RAAMP-SU SPIUs will oversee the design, implementation, and monitoring of the future stakeholder engagements under the project in accordance with the SEP. The communication department will manage project-wide stakeholder management programs, with the communication specialist providing oversight in various project functions.

#### 9.5.1 Information Disclosure

The RAAMP-SU ESMF shall be disclosed nationally, locally (states and communities) and at the World Bank Infoshop. The procedure for the disclosure of the ESMF is provided in Table 38 below.

Table 38: ESMF Disclosure Procedure

S/N	Action	Remarks
1	Disclosure in 2 National newspapers	The RAAMP-SU FPMU will disclose the ESMF as required by the Nigeria EIA public notice and review procedures
2	Disclosure in 2 state newspapers	
3	Disclosure in 2 local newspapers	
4	Disclosure at the, FMEEnv office and the SMEnv in all RAAMP-SU Prospective States and the FCT	
5	Disclosure at the RAAMP-SU office	
6	Disclosure on the World Bank external website or Infoshop	The ESMF will be disclosed according to the World Bank Disclosure Policy- OP/BP 17.50

Importantly, the ESMF shall be disclosed at the national and state levels. A tentative budget for the disclosure of the ESMF is provided in Table 39 below. Similarly, E&S instruments to be prepared for sub-projects/intervention works at the RAAMP-SU Prospective States shall also be disclosed locally (i.e. at the states, LGAs and community) by the SPIUs. Additionally, the safeguards unit of the SPIUs shall follow up to ensure that all instruments prepared for their sub-projects are disclosed at the WB Infoshop according to the Bank's disclosure policy (OP 17.5).

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**Table 39: Estimated Total Cost for the ESMF Disclosure**

Level	Quantity	No of Copies	Cost for ESMF Production and Disclosure	Total Amount (NGN)	Total Amount (USD)
National	1	20	60,000	1,200,000	798.67
State, LGA and Communities	37	6	60,000	13,320,000	8,865.22
<b>Sub-Total</b>				<b>14,520,000</b>	<b>9,663.89</b>
Contingency (5% of Sub-Total Cost)				726,000	483.19
<b>Total Disclosure Cost</b>				<b>15,246,000</b>	<b>10,147.09</b>

### 9.5.2 Access to Information

Access to information is the right of individuals and communities to seek, receive, and impart information about the project that may affect them. It includes information about project design, potential risks and impacts, mitigation measures, and grievance redress mechanisms. Meaningful stakeholder engagement depends on timely, accurate, accessible, and comprehensible information. In line with the requirements of ESS 10, the RAAMP-SU SPIUs shall make available project-related information as early as possible in the project cycle and in a manner, format, and language appropriate for each stakeholder group. Formats to provide information may include presentation printouts, nontechnical summaries, project leaflets, and pamphlets. Ideally, maps of the project area and non-technical drawings should be included in the materials. Documents used in stakeholder consultation should be made available to stakeholders, for example on community public notice boards, and, where possible, on the RAAMP-SU website.

# CHAPTER 10 – CONCLUSION AND RECOMMENDATIONS

## **The recommendations below have been provided for the proposed project**

- It is important that the FPMU streamlines procedures with the FMEnv with regards to registering sub-projects and disclosure. It is substantial that this is done to enable early handshakes with the FMEnv. Additionally, it is also pertinent that the RAAMP-SU Prospective States SPIUs carry the SMEnv along during the screening of sub-projects especially when the E&S assessments is been determined.
- Sub-project/intervention works design should take into consideration its impacts on the biophysical and socioeconomic environment. This is critical as it will help reduce the impacts of sub-projects relating to involuntary resettlement. It is important that potential sites and locations for sub-projects/intervention works be properly assessed so that alternatives that benefit the communities more in terms of project design are chosen or adopted.
- Sub-projects/intervention works design should take into cognizance, locations that are already prone to erosion such that the design does not exacerbate the occurrence of erosion, likewise flooding. Rather, designs should add value and enable the correction where and if possible, of pre-existing issues such as erosion and flooding.
- States should do a proper mapping of markets for construction materials, etc. so that when Contractors are been procured, they can be referred to these markets. this will help for the sourcing of materials from the market, rather than the Contractors exploiting natural resources, which might result to some form of habitat loss or environmental degradation.
- The full requirements of ESS 5 must be fully taken into consideration where sub-projects/intervention works will result to physical and economic displacement and subsequent preparation of RAPs.
- In the light of ESS2, the project should take OHS very critical. Assumptions should not be made that the Consultant Occupational Health and Safety Management System (OHSMS) is fully intact. E&S officers and TAs working with the SPIUs should do an independent audit of the Consultants OHSMS and make recommendations where there are gaps. This will help enforce the Contractors compliance to health and safety. Additionally, Supervisory Consultants are expected to do the same.
- It is important that all safeguards' offices are trained on the application of the ESIRT such that there can be a uniform way of reporting accidents that might occur in the course of implementing sub-projects/intervention works. Refer to section 5.6.2.
- Similarly, all E&S officers, especially for the new states joining need to undergo ESF training. Significantly, they need to be trained on the GPNs for the ESSs generally and more specifically, those that are relevant to RAAMP-SU implementation.
- There should also be capacity building on SEA/SH(GBV) and VAC. This should be done through the GBV specialist of the FPMU for all GBV officers that will be involved in the RAAMP-SU implementation. Additionally, while this ESMF provides the summary of gender capture from a regional perspective, at the state level, this should be more specific understanding the issues relating to gender capture so that this can help add value in the activities directed at implementing the GBV Action Plan.
- Gender inclusion should be a prerequisite for this project. At the level of workforce. SPIUs should have a good balance of male and female workers. This should also apply to the procurement of services. FPMUs and SPIUs should see that Consultants teams have gender inclusion likewise companies providing Supervisory Consultant services and also Contractors that will be implementing. The project should encourage gender inclusiveness structurally throughout every form of workforce that will be involved or play a role in RAAMP-SU implementation. Additionally, there should be regular sensitization at the community. Where committees need to be formed at



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the community levels for the purpose of RAAMP-SU implementation, monitoring of RAAMP-SU activities, gender inclusion should be a factor and key consideration.

- At the end of the project, depending on how the project chooses to phase intervention works, it is important that an environmental and social audit is conducted twice or thrice throughout the course of RAAMP-SU implementation.
- The RAAMP-SU Prospective States and the FCT should engage and have continuous stakeholder engagements with the SEMAs for the purpose of implementing the emergency response.
- Where some states do not already have Security Consultants, it is important that they procure Security Consultants, to enable them prepare state specific SRAs and SMPs. The Security Consultant will also provide continuous and updated information on the security risks and threats in the states. Such information will also be used when sub-projects/intervention works are being designed and when Contractors have been procured to implement them. The provisions of the specific state's SMPs should also be made available to Contractors to enable them have their own internal security planning.
- Following on the options suggested in the "Important note" in Chapter 5, sub-section 5.4.1, cost consideration for E&S assessments should be done thoughtfully. Costs should be considered where E&S assessments for a singular work package and where the decision is for the E&S assessments to be for a selection of work packages, there should be a proper cost assessment for the contracts that will be issued to prepare the E&S assessments.
- The project might want to consider RAAMP-SPIUs conduct a mapping of PCR across the locations for their sub-projects/intervention works. Such information will be of value to enterprises that might be procured to prepare E&S assessments. This should also be considered for protected areas, game reserves, etc.

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# ANNEX 1 – Terms of Reference

## 1. BACKGROUND AND CONTEXT

The Federal Government of Nigeria (FGN) has requested the World Bank to increase the number of the Nigeria Rural Access and Agricultural Marketing Project (RAAMP) participating states. There are 19 pioneer participating states under the current project, however, the next phase of RAAMP program, which will be the RAAMP Scale-Up<sup>70</sup> would be open to all states in Nigeria. The project development objective of RAAMP Scale-Up is to improve rural access and agricultural marketing in selected participating states whilst enhancing sustainability of the rural and state road networks. The project will be guided by the Government's Rural Travel and Transport Policy (RTTP). The lead implementing agency is the Federal Department of Rural Development (FDRD) of the Federal Ministry of Agriculture and Rural Development (FMARD). The Federal Project Management Unit (FPMU) is overseeing the project on behalf of FDRD, while the respective state government of the participating states will implement it through the State Project Management Units (SPIUs).

The RAAMP Scale-Up (RAAMP-SU) will focus on connecting rural communities to: local agricultural markets such as roadside agro-logistics hubs; social amenities such as schools and hospitals; introduce green rural transport; as well as promote social cohesion at rural level. The RAAMP-SU will provide fund to complete planned activities under RAAMP in participating States which could not be implemented due to inflation and currency fluctuation. In addition, the RAAMP-SU will fund other States that meet the criteria to join the project. The scale-up would emphasize institutional strengthening such as operationalising the Rural Access Road Agency (RARA), State Road Fund (SRF), Road Asset Management System, Green rural transport Strategy, Road Safety Management, digitalized outcome monitoring, skill development for management of rural roads as well as gender-targeted opportunities. State roads that close the connectivity loop will also be included on the Scale-up project.

## 2. PROJECT COMPONENTS

The scale-up would maintain the four existing RAAMP components and aim to introduce more content and innovation for better result as well as the addition of a New Component.

Component A: Improvement of Resilient Rural Access

- (i) Subcomponent A.1: Climate-informed Rural roads rehabilitation/upgrade
- (ii) Subcomponent A.2: Technical support for Rural Roads rehabilitation/upgrade
- (iii) Subcomponent A.3: Social inclusion and promotion of gender equality

Component B: Climate Resilient Asset Management

- (i) Subcomponent B.1: Asset management improvement and Resilience Scale up
- (ii) Subcomponent B.2: Development and implementation of a climate risk informed road asset management system

Component C: Institutional Strengthening and Project Management

- (i) Subcomponent C.1: Project Management
- (ii) Subcomponent C.2: Institutional Strengthening and sector reforms

Component D: Contingent Emergency Response

## 3. RATIONALE FOR THE ESMF

The rationale for preparing this ESMF is to assist FDRD in examining the environmental and social risks and impacts of the RAAMP-SU subprojects. It guides the FDRD to assess potential environmental and social risks and impacts of the SU's interventions when subprojects' locations cannot be determined during project preparation. It sets out the principles, rules, guidelines, and procedures to assess the potential environmental and social (E&S) risks and impacts. It provides adequate information on the area in which subprojects are expected to be sited, including any potential E&S vulnerabilities of the area; and on the potential impacts that may occur and mitigation measures that might be expected to be used.

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<sup>70</sup> RAAMP refers to the parent parent project with 19 pioneer states  
RAAMP-Scale-UP (RAAMP-SU) denotes the planned scale up program open to all states in Nigeria

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RAAMP-SU activities have the potential to generate environmental and social risks and impacts. Potential risks and impacts on the environment side includes noise and dust generation, delay in travel time due to traffic obstruction, accident risks to road users, potential pollution to water resources from poor waste management while on the social side includes community health & safety risks such as accidents/spread of STDs, risks of GBV/SEA/SH, disruption of social amenities like electric power poles, potential labour influx, minor agricultural land take, impacts on properties, disruption of agricultural activities, relocation of shrines, likely exclusion of vulnerable people from consultations and project benefits and, potential difficulties to reach out affected communities as a result of security challenges.

Eight (8) of the Environmental and Social Standards (ESSs) are deemed relevant to the RAAMP-SU activities, namely:

- ESS1: Assessment and Management of Environmental and Social Risks and Impacts,
- SS2: Labor and Working Condition,
- ESS3: Resource Efficiency and Pollution Prevention and Management,
- ESS4: Community Health and Safety,
- ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement,
- ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources,
- ESS8: Cultural Heritage and,
- ESS10: Stakeholder Engagement and Information Disclosure.

RAAMP has an existing Environmental and Social Management Framework (ESMF) which was prepared in 2018, under the World Bank Operational Safeguards. Against this backdrop, the FPMU requires the services of a consultant firm to update the existing ESMF with the view of covering all States in the entire country under the RAAMP-SU. The preparation of the ESMF is to be guided by the WB ESF and in compliance with the relevant Environmental and Social Standards (ESS).

#### 4. OBJECTIVES OF THE ESMF

The overall objective is to revise/update and adopt the existing ESMF to guide E&S management under the RAAMP-SU. The updated framework will provide guidelines for assessing the environmental, socio-economic, and health risks and impacts of the project as well as recommending appropriate generic mitigation measures and monitoring plans in line with the relevant Environmental and Social Standards (ESS). It should contain generic mitigation measures and plans to enhance positive outcomes and reduce, offset adverse risks and impacts. Once subprojects sites are identified and the necessary planning information is made available, site-specific screening will be conducted and risk and impact mitigation measures proportional to risks and impacts shall be considered. The updated ESMF shall also provide provisional cost estimation, and information on the agency or agencies responsible for addressing project risks and impacts, including capacity of these institutions/agencies to manage environmental and social risks and impacts.

With the overall objective of updating the existing RAAMP ESMF, the specific objectives of the assignments are to update:

- The inventory of likely potential environmental and social risks and impacts that may arise when the RAAMP-SU subprojects' locations are determined;
- Roles and responsibilities of stakeholders to be involved in the identification and implementation of E&S risks and impacts mitigation measures;
- Subproject screening procedures as well as forms, guidance, and checklists to assist in generating and providing E&S technical inputs to subprojects;
- Existing screening procedure for identifying the environmental and social risks and impacts associated with the SU subprojects;
- Existing TORs for preparing ESF/safeguards instruments (such as ESIA/ESMPs) ;

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- Existing E&S capacity assessment of the project implementation entities including their capacity to screen subprojects and monitor the implementation ESF instruments within the context of the relevant ESS' objectives and requirements and make proposals for capacity enhancement intervention proportional to the risk of the project;
- The budget requirement for implementation of E&S risks and impacts - keeping in mind price inflation and exchange rate differentials;
- Existing public consultation plan to an outline of a stakeholder engagement plan;
- And define environmental and social standards performance indicators.

### 5. DETAILED SCOPE OF WORK FOR THE PREPARATION OF THE ESMF

The RAAMP-SU is to be implemented in all States of the FGoN. The scope of this ESMF will cover all 36 States and those subproject activities are likely to be supported by the SU. The project is expected to be implemented during the period between 2024 - 2029. With this context, the updated ESMF scope of work include but not limited to:

- a. Taking visits to the States to assess the likely environmental and social risks and impacts associated with each project component and potential subproject across the 36 States.
- b. Updating the existing ESMF, the applicable Laws and regulations; conducting specific environmental and social surveys; updating mitigation, monitoring, and institutional arrangements,
- c. Updating the technical details for each mitigation measure including types of impacts to which it relates, the conditions under which it is required (e.g., continuously or in the event of contingencies), as well as preliminary design, equipment descriptions, and operating procedures, as appropriate. Estimate the impacts and costs of the mitigation measures for each of the activities separately and of the institutional and training requirements to implement them.
- d. Recommending feasible and cost-effective measures to prevent or reduce significant negative impacts to acceptable levels. Apart from mitigation of the potential adverse impacts on the environmental and social components, the ESMF shall identify opportunities that exist to induce positive impacts of sub-projects.
- e. Including measures for emergency response to accidental events (land slips during construction or operation.), as appropriate.
- f. Updating Occupational Health and Safety measures incorporated into the ESMF. Provide Environmental, Social, Health and Safety (ESHS) Guidelines in accordance with the WB requirements.
- g. Including/ updating plans (i.e. guidelines for road construction contractors to prepare the Contractor's ESMP), such as for management and redevelopment of borrow areas and construction camps, waste management plan, traffic management plan, working conditions and management of workers, management of chemical, hazardous and non-hazardous material/waste, noise, occupational health and safety of workers and community, SEA/SH, labor influx (workers accommodation, COVID-19 and HIV/AIDS prevention etc.), and other key impacts under contractors' control. The actual plans will need to be prepared by the road construction contractors with the help of these sample plans. In addition, the ESMF shall include good practice guidelines, related to construction and upkeep of plant and machinery.
- h. Updating the monitoring plan for implementation of the ESMF, for different stages of the project (pre-construction, construction, operation). The Consultant shall update the performance indicators, approach of monitoring, and frequency. The performance indicators should include both quantitative and qualitative types, but the Consultant shall consider practicality aspect and provide approach for monitoring each identified indicator.
- i. Updating the environmental supervision, monitoring and auditing requirements. The monitoring program shall specify performance indicators, monitoring parameters (air, water, noise, and soil), reference standards, monitoring method, frequency, duration, location, and reporting on progress and results of mitigation. All environmental lab testing (if required) shall be conducted by an approved environmental lab by the Federal Ministry of Environment. In

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addition, the program will specify what action should be taken and by whom in the event that the proposed mitigation measures fail, either partially or totally, to achieve the level of environmental and social protection expected.

- j. Providing implementation schedule for measures that must be carried out as part of the sub-project, showing phasing and coordination with overall project implementation plans; and estimated cost and sources of funds for implementing the ESMF (integrated into the total project cost tables).
- k. Ensuring implementation costs of mitigation measures and actions are integrated into the project's overall planning, design, budget, and implementation. An indicative outline of ESMF is provided in **Annex A**.
- l. Including a section in the ESMF (details to be included in Annex), on security risks and impact assessment, including security risks to project workers, RAAMP, and activities. This Security Risk Assessment (SRA) as part of the ESMF will include a determination of the level of security required for the project aligned with the ESS1. Where such risks are considered low, security arrangements might consist of simple measures, such as fencing or signs and security guards at night. Where security risks are considered more substantial, the SPIU and/or contractors might choose to engage private security providers or work with public security personnel to provide protection in high-risk situations, particularly in situations of fragility, conflict and violence (FCV).

The SRA will provide the recommendation for the preparation of a Security Management Plan where there are high security risks. The Security Mitigation measures will be provided in the ESMF. These measures will provide the design and implementation of the security arrangements for the project including the assessment of security risks during the life of the project. Note that these security arrangements for a project may themselves pose risk to and impacts on project workers and local communities in line with ESS 4. Responsibilities for execution and supervision of each of the mitigation and enhancement measures shall be specified in the ESMF.

- m. The ESMF will also have a detailed organogram showing all actors to be involved in ESMF implementation, monitoring, reporting, independent supervision and auditing, their relationship to overall project construction and operational management teams and contractors, and points of interface with independent oversight entities. Organogram should indicate entry points for local citizen engagement and NGO participation in monitoring and reporting.
- n. In addition, the Consultant will assess the management of such risks at the project and sub-project levels, including whether a system is in place and functions to address risks related to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), including Gender-Based Violence (GBV) and Violence Against Children (VAC) in line with the project's ESMF, ESSs, and the World Bank's Good Practice Note on SEA/SH (which also covers GBV/VAC).
- o. The Consultant shall identify unanticipated incidents arising from both natural and man-made hazards, shall prepare **Emergency Response Plan (ERP)** particularly for the construction stage.
- p. **Gender-Based Violence Action Plan (GAP)** will be developed as per the WB guidelines for SEA/SH for the entire project. It will encompass all parameters regarding Gender Based Violence (GBV) for the road construction. GAP will also cover pre-, during and post-implementation parameters of GBV aspects which includes workshops trainings, and administration under applicable laws by both provincial and national. Detailed Scope and an indicative outline is provided in **Annex B**
- q. **Grievance Redress Mechanism (GRM)** will be added as Annexure in the ESMF to provide an easy to access, efficient as well as effective means of resolving sub-project-related grievances and complaints in a timely and amicable manner.
- r. **Environmental and Social Screening Checklist(s)** would be required as mandatory part of ESMF, which serves as decision-making tool while indicating the environmental and social risks involved, type of E&S assessments required on sub-projects (specially according to the World Bank Regulations).



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- s. **Draft TORs for preparing ESIA/ESMPs** would be added as an Annex in the ESMF for post-appraisal phase of the project indicating the scope of work for detailed environmental and social assessments as required for project specific areas and activities.
- t. The Consultant will, in coordination with the FPMU provide technical assistance in incorporation of final data acquired during the assignment for the preparation of Environmental and Social Commitment Plan (ESCP).
- u. The ESMF will include:
- A description of Proposed RAAMP-SU components and project activities
  - Regulatory and institutional framework and capacity assessment
  - Comprehensive Baseline Data to include:
    - (a) Physical environment: project location; geology; topography; soils; climate and meteorology; ambient air quality; surface and ground water hydrology and quality etc.
    - (b) Biological environment: flora; fauna; rare or endangered species; sensitive habitats, including parks or preserves, significant natural sites, etc
    - (c) Socio-economic environment: land use, land tenure and human settlements patterns, gender issues, vulnerable groups, disability inclusion.
    - (d) Public Health condition of each project specific area- water and sanitation conditions, communicable and non- communicable disease profile, access to health services
  - Based on the fact that sub-project locations and activities have not been determined, the ESMF will provide a description of the procedure for carrying out environmental and social assessment of site-specific impacts of sub-projects to be financed under RAAMP-SU.
  - A comprehensive assessment of the potential environmental and social impacts (positive and negative) of the project; potential negative impacts to highlight include: Civil work/labour influx and associated impacts such as Gender Based Violence; Occupational Health and Safety; Community Health and Safety; Displacement and conflict/fragility; other broader social issues such as risk of elite capture; social exclusion of the most marginalized/vulnerable (e.g. persons with disabilities, IDPs, survivors of sexual violence); stigmatization and isolation of communities that adopt social norms of girls' access to education; Social conflicts within homes (e.g. intimate partner violence) and across communities due to cash support provided to parents/guardians; etc.
  - A generic ESMP table for different intervention typologies to be financed under the RAAMP-SU as a whole (understanding that site-specific activities may require site specific plans). The ESMF should recommend feasible and cost-effective measures to prevent or reduce significant environmental and social impacts to acceptable levels, estimate the impacts and costs of those measures. Institutional responsibility for mitigation and monitoring should be clearly specified and articulated.
  - Identification of the capacity building needs and recommendations of actions to strengthen the line Ministries to ensure sustained environmental and social compliance;
  - Environmental and social assessment screening checklist for screening the potential impacts of site-specific interventions which would provide guidance for the preparation of site-specific safeguards instruments.
  - The ESMF will also describe procedures for updating site-specific instruments of sub-projects which are initiated but not completed under the parent project (RAAMP) and are being transferred for financing under RAAMP-SU. The update will ensure that existing instruments for uncompleted and transferred sub-projects are proportional to the E&S risks associated with the interventions.
  - The ESMF must describe how monitoring information will be applied to adaptively manage risks during project implementation. This will include a clear description of steps to be taken by appropriate project implementation entities (government team, supervision consultants, contractors) to make adjustments in risk management and mitigation effort in site-specific instruments.
  - A summary of Grievance Redress Procedure for the project

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- Security Risk Assessment
  - Environmental, Social, Health and Safety (ESHS) Guidelines in accordance with the WB requirements
- v. During the assessment, the consultant will collaborate and work closely with:
- The Federal Project Management Unit (FPMU)
  - Federal Ministry of Women Affairs
  - Federal and State Ministries of Environment
  - Other key institutions involved in the project.

### 6. INFORMATION DISCLOSURE

The Consultant should maintain a record of the public consultation and the records should indicate: means used to seek the views of affected stakeholders (such as consultations, surveys etc.); the date and location of the consultation meetings, a list of the attendees and their affiliation and contact address; and summary minutes.

### 7. DELIVERABLES & TIMELINES

By way of illustrations, and not limitation, ESMF to be submitted by the Consultants to FPMU as part of deliverable under consultancy services will include the following:

**Environmental and Social Management Framework (ESMF)** document prepared as per the contents provided in **Annex A**, including following annexures of;

- a. Security Risk Assessment (SRA) including SEA/SH risks & GBV
- b. Emergency Response Plan (ERP)
- c. Gender-Based Violence Action Plan (GAP)
- d. Grievance Redress Mechanism (GRM)
- e. Environmental & Social Screening Checklist
- f. TORs for ESIA, ESMP preparation for roads construction or rehabilitation works

The Timeline for completion of the deliverable and end of contract is 10 Weeks

#	TASK	Number of Copies	Due Date
1	Submission of Inception Report and Workplan	Three (3) hard copies and one electronic copy in a USB drive shall be submitted to the FPMU	One Week after signing of Contract
2	Submission of draft ESMF to FPMU	Three (3) hard copies and one electronic copy in a USB drive shall be submitted to the FPMU	6 <sup>th</sup> Week after contract signing
3	Conduct stakeholder/ Validation workshop on draft ESMF	Part of final draft report	7 <sup>th</sup> Week after contract signing
4	Submission of draft final ESMF including feedback from the validation meetings and incorporating comments from the FPMU and the WB	Three (3) hard copies and one electronic copy in a USB drive shall be submitted to the FPMU	8 <sup>th</sup> Week after contract signing
5	Final ESMF	Ten (10) hard copies and three (3) electronic copies in a USB drive shall be submitted to the FPMU	10 <sup>th</sup> Week after contract signing

### 8. QUALIFICATION AND EXPERIENCE OF KEY EXPERTS

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No.	Key Expert	Qty	Minimum Qualification and Experience
1	Team Leader Environmental Management Specialist/ engineer	01	The candidate should have Master's degree or equivalent in environmental engineering/science with minimum 10 years of experience of which at least 8 years on environmental impact assessment on infrastructure development projects and experience of preparing environmental management plans. The candidate must have working knowledge of the World Bank's ESF. Experience in preparation/implementation of ESMP under the ESF in at least two World Bank or multilateral funded projects is required.
2	Deputy Team Leader Social Development Specialist	01	At least 10 years of experience working on social development issues and Social Impact Assessments and Management Plans. Experience on social impact assessment on infrastructure development projects. The candidate must have working knowledge of the World Bank's ESF. Experience in preparation/implementation of ESMP or social assessments under the ESF in at least two World Bank or multilateral funded projects is required. Specific experience in RAP, GRM, Labour management is required. S/he should have a post-graduate degree in a relevant social science (development studies, sociology, urban studies, anthropology, etc.)
3	Jr. Environmental Management Specialist/ engineer	01	The candidate should have Master's degree or equivalent in environmental engineering/science with minimum 5 years of experience of which at least 5 years on environmental impact assessment in infrastructure development projects and experience of preparing environmental management plans. The candidate must have full knowledge of the World Bank's guidelines, procedures and operational policies/directives. Experience of working as environmental expert in at least two World Bank or multilateral funded projects is required or preparing/implementing ESMPs.
4	Jr. Social Development Specialists	01	At least 5 years of experience working social development issues and Social Impact Assessments and Management Plans. Some experience should also be in development projects, specifically on RAP, GRM and labor issues. Experience of working on development projects in Nigeria will be preferred. Experience of working on World Bank funded projects will be advantageous. S/he should have a post-graduate degree in a relevant social science (development studies, sociology, urban studies, anthropology, etc.)
5	Gender/GBV Specialist	01	At least 5 years of experience working on gender and GBV/SEA/SH management and prevention. issues especially with women. Experience of working on World Bank funded projects will be advantageous. S/he should have a university degree in a relevant social science (gender studies, development studies, sociology, etc.). The candidate should have specific experience in GBV Mapping, GBV Accountability & Response Framework, GBV prevention and Survivor-centred approach.
6	Occupational Health & Safety Specialist	01	At least 5 years of experience in occupational health & safety risk management on infrastructure projects. The candidate should have an OHS certification in ISO, NEBOSH or an equivalent, in addition to a relevant first degree. Experience of working on World Bank funded projects will be advantageous.

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### 9. CONDUCT OF THE CONSULTANTS

- The Consultant will, at all times, be expected to carry out the assignment with the highest degree of professionalism and integrity. The Consultant will be expected to conduct his/her duties in an open and transparent manner;
- The Consultant will not, under any circumstance, take any actions or be seen to be taking any actions, which may hinder or prevent the RAAMP Project from
- executing this assignment;
- The Consultant will study all RAAMP guidelines and policies and will be expected to ensure that the assignment is concluded with the strictest adherence to all such policies and regulations;
- The Consultant will not, under any circumstances, take any material decision pertinent to this assignment without the express permission and written consent of an authorized representative of RAAMP Project; and
- The Consultant will not, under any circumstances, discuss, divulge or use any information regarding this assignment or any other transaction conducted as part of the FGN's Program, without the express written permission of an authorized representative of RAAMP Project.

### 10. FEES AND REIMBURSABLES

Consultant fees and reimbursable (travel costs, organization of consultation meetings with key stakeholders) shall be included in the proposal/ Workplan.

The following milestone payment will be adopted:

Inception Report – 20%

Draft ESMF Report – 40%

Draft Final ESMF Report – 20%

Final Report – 20%

#### **Annex-A: Indicative Outline of Environmental & Social Management Framework**

##### Executive Summary

##### Chapter 1: Introduction

##### 1.1 Introduction

##### 1.2 Purpose of the ESMF

##### 1.3 Sectoral Background (a brief)

##### 1.4 Rationale of the ESMF

##### 1.5 Approach and Methodology of the ESMF

##### 1.6 Structures of this ESMF

##### Chapter 2: Project Description

##### 2.1 Description of the RAAMP Project

##### 2.2 Project Development Objectives (PDO)

##### 2.3 Project Beneficiaries

##### 2.4 Project Location

##### 2.5 Project Components

##### Chapter 3: Overview of Policy, Legal and Regulatory Framework

##### 3.1 Review of National Environmental and Social Policy, Legal and Regulatory Framework

##### 3.2 Applicable International Treaties Signed by the Government of Nigeria

##### 3.3 World Bank's Environmental and Social Framework

##### 3.4 Gap Analysis of World Bank Requirements and National Laws

##### 3.5 Application of World Bank Policies, Acts and Rules on RAAMP components and their Classification

##### 3.6 Application of WB ESSs

##### Chapter 4: Potential Key Environmental and Social Impacts

##### 4.1 Impact Assessment and Prediction (as per relevant ESSs)

##### 4.1.1 Impact Assessment Methodology

##### 4.2 Potential Key Environmental and Social Impacts of the sub-projects (as per relevant ESSs)

##### 4.2.1 Potential Environmental and Social Impacts Related to Project Siting

##### 4.2.2 Potential Environmental and Social Impacts during Project Implementation

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### 4.2.3 Environmental and Social Impacts on completion

#### Chapter 5: Environmental and Social Management Procedures

- 5.1 General Principle (ESS 1-10)
- 5.2 Environmental and Social Assessment and Management Process (ESS 1)
  - 5.2.1 Screening
- 5.3 Environmental and Social Impact Assessment
- 5.4 Specific Activities and Responsibilities in the Environmental and Social Assessment process
- 5.5 Environment and Social Management Plan (ESMP)
  - 5.5.1 Scope and Objectives of ESMP
  - 5.5.2 Inclusion of Relevant Components of ESMP in Contract Documents
  - 5.5.3 Payment Milestones
  - 5.5.4 Guideline to Incorporate Environmental Management in Bid Documents
  - 5.5.5 Environmental Codes of Practice (ECoPs)
- 5.6 Mitigation Measures to Address Environmental Impacts
- 5.7 Required Site Specific Management Plans (as per relevant ESSs)
- 5.8 COVID-19 Health and Safety of the Workforce
- 5.9 Consultation and Participation Plan (ESS10)
- 5.10 Guideline for preparation of Environmental and Social Monitoring Plan
- 5.11 Monitoring Program
- 5.12 ESMP Implementation Cost

#### Chapter 6: Environmental, Social and Health & Safety Capacity Assessment

- 6.1 Capacity Assessment of The Partner Organizations of the RAAMP Project
  - 6.1.1 Objectives of the Assessment
  - 6.1.2 The Approach
- 6.2 Result of the Capacity Assessment
  - 6.2.1 ESS and Equivalent Policies, Laws and Regulations
  - 6.2.2 Analysis of Gaps in Government Policies, Laws and Regulations
- 6.3 Roles and Capacities of Agencies Involved in ES Risk Management
  - 6.3.1 Main Implementing Agency of RAAMP Project
  - 6.3.2 Co-implementing Agencies of RAAMP Project
  - 6.3.3 Other Agencies Important for E&S Safeguards of RAAMP Project
- 6.4 Capacity Building Plan
  - 6.4.1 Training Plan
  - 6.4.2 Monitoring and Evaluation

#### Chapter 7: Institutional Framework

- 7.1 Key Institutions/Persons Involved in the Implementation of the RAAMP ESMF
  - 7.1.1 Governmental and Non-Governmental Organizations
  - 7.1.2 Consultants
  - 7.1.3 Contractors
- 7.2 Project Implementation Arrangement
- 7.3 Institutional Arrangements for ESMF implementation in RAAMP Project
  - 7.3.1 During Project Implementation
  - 7.3.2 Post Project Monitoring Period

#### Chapter 8: Stakeholder Engagement and Disclosure

- 8.1 Requirements of ESS 10: Stakeholder Engagement and Information Disclosure of RAAMP
- 8.2 Stakeholder Consultations and Disclosure (ESS 10)
  - 8.2.1 Objective of the Consultations
  - 8.2.2 Methodology and Tools for the Consultation
  - 8.2.3 Outcomes of Consultation Meetings
- 8.3 Consultations and Communication Guideline (ESS10)
  - 8.3.1 Community Engagement and Stakeholders Participation (ESS10)
  - 8.3.2 Gender Analysis Procedures and Guidelines (ESS 1, 2, 4, 5, 7)

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- [8.4](#) [Grievance Mechanism \(ESS10\)](#)
- [8.4.1](#) [Composition of Local/Site Specific GRC](#)
- [8.4.1](#) [Composition of PIU and PSC level GRC](#)
- [8.5](#) [Communication and Consultation Strategy \(ESS10\)](#)
- [8.5.1](#) [Information Disclosure \(ESS10\)](#)
- [8.5.2](#) [Access to Information \(ESS10\)](#)

### **Annexure**

- [Annex 1: Sample Environmental and Social Screening Form & Checklist](#)
- [Annex 2: Terms of Reference \(ToR\) of the ESIA Study & Structure of the ESIA Report](#)
- [Annex 3: Security Risk Assessment \(SRA\) including Security Management Plan](#)
- [Annex 4: Emergency Response Plan \(ERP\)](#)
- [Annex 5: Gender Action Plan \(GAP\)](#)
- [Annex 6: Grievance Redress Mechanism \(GRM\)](#)
- [Annex 7. Terms of Reference for the preparation of ESIS and structure of the ESMP report.](#)
- [Annex 8. Summary of SEA/SH and GBV Action Plan](#)



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### **Annex-B: Detailed Scope of Work and Indicative outline of GAP**

The scope of the ToR relates to the Gender-Based Violence Action Plan. The project-specific Gender Action Plan (GAP) is a tool used to make certain gender mainstreaming tangible and overtly visible in project design and implementation as well as addressing SEA/SH risk associated to the Project.

The project-specific Gender Action Plan (GAP) is a tool to integrate gender in project design and implementation and address potential GBV risk that may occur in the Project. It ensures inclusion of women and other vulnerable members' needs by setting specific targets. Beside this, it also includes mechanism to ensure implementation of the gender design elements and gender monitoring and evaluation indicators. This process will equally assess and identify potential risk of GBV that may occur in rural areas due to labor influx and road construction Project and design possible actions and recommendation to mitigate or prevent risk.

(i) The GAP will enhance a culture of inclusion and empowerment for women in the workforce, where currently, they are very few and present in higher level technical positions. In addition, there is no present culture of awareness of such implementation, guidance and training's on women's issues in the work force as well as the issues they face at the educational and community level.

(ii) To ensure the efficient framework of the project in terms of design criteria, outputs and after effects, an effective GAP is necessarily important. Women and children are commonly more vulnerable to GBV issues ranging from SEA/SH, access to the basic facilities of health and education. However, while they are relatively bigger stakeholders, shoulder significant responsibility, and are at greater risk, they are often left out of the picture when project design and implementation decisions are being made. The GAP will also support preparatory work which will help address gender issues in the project and quotas, targets, design features of the project to address gender inclusion and facilitate women's involvement and/or ensure tangible benefits to them. A key part of this will include mechanisms to ensure implementation of the gender design elements and gender-Based Violence monitoring and evaluation indicator.

The GAP will thus ensure that women can influence decisions to improve and change the project design (infrastructure design as per the need and requirement of women), and women and men to be represented equally in all aspects of the community and project implementation outcomes. The GAP will take into account experiences in other similar implemented project studies, expert reviews, surveys etc.

The indicative outline for GAP is as follows:

#### **Chapter 1 – OVERVIEW**

##### **1.1 Data Collection Sources and Tools**

1.1.1 Data from Primary Resources

1.1.2 Data from Secondary Sources

##### **1.2 Gender Impact**

1.2.1 The Census Survey

1.2.2 Household Socio-Economic Survey

##### **1.3 Data Quality and Validation**

##### **1.4 Gender Databank**

#### **Chapter 2 – PROFILE OF THE PROJECT AREA**

##### **2.1 Context**

##### **2.2 Ethnographic and Social Assessment**

2.2.1 Settlement Pattern

##### **2.3 Social Development**

2.3.1 Education

2.3.2 Health

2.3.4 Drinking Water and Sanitation

2.3.4 Unemployment

2.3.5 Others

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### **Chapter 3 – SOCIO-ECONOMIC PROFILE OF AREA**

#### **3.1 An Overview**

#### **3.2 Demographic Profile**

3.2.1 Population and Household Size

3.2.2 Distribution of PAPs by Age and Gender

3.2.3 Educational Levels of the

3.2.4 Occupational Background

3.2.5 Household Well-being/Livelihood

3.2.6 Ownership of Consumer Durables

3.2.7 Family Expenditure

3.2.8 Livestock Ownership

#### **3.3 Access to Social Amenities**

#### **3.4 Poverty Impacts**

#### **3.5 Law and Order and Security Situation**

#### **3.6 Women Issues and Development Needs**

#### **3.7 Other Information**

### **Chapter 4 – COMMUNITY PARTICIPATION, CONSULTATION AND DISCLOSURE**

#### **4.1 Community Participation and Consultation**

4.1.1 Introduction

4.1.2 Identification of Project Stakeholders

4.1.3 Stakeholder Consultation

#### **4.2 GAP Disclosure**

### **Chapter 5 – INSTITUTIONAL ARRANGEMENTS**

### **Chapter 6 – INSTITUTIONAL SET UP**

### **Chapter 7 – COORDINATION INITIATIVES**

### **Chapter 8 – TRAINING IN GAP IMPLEMENTATION**

### **Chapter 9 – IMPLEMENTATION OF GAP**

### **Chapter 10 – MONITORING AND EVALUATION**

#### **10.1 Introduction**

#### **10.2 Monitoring of GAP Implementation**

10.2.1 Internal Monitoring

10.2.2 External Monitoring

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# ANNEX 2 – RAAMP-SU Sample E&S Screening Checklist

Relevant ESSs	Specific Questions for Proposed Sub-projects/Intervention works	Yes/No/Probably	Risk Categorization			
			Low	Moderate	Substantial	High
<b>ESS 2: Labour and Working Conditions</b>	Is the workforce requirement of the project low (10-15 workers), moderate (16-35 workers), substantial (36-60 workers) or large (61 & above)?					
	Could the working environment pose a potential OHS risks or threat to technical and unskilled staff (e.g. gas leakage, exposure to chemicals and/or other hazardous materials, electric shocks, use of potentially hazardous tools, machinery and equipment, exposure to heights, etc.)?					
	Does the sub-project design and nature of work schedule require a GRM for workers?					
	Will use of the hierarchy of controls require Elimination, Substitution, Engineering, and Administrative Controls?					
	Will the sub-project design require the Contractors to prepare site-specific management plans (e.g. Cultural Heritage Management Plan, Borrow Pit Management Plan, etc.)?					
<b>ESS 3: Resource Efficiency, Pollution Prevention and Management</b>	Could the sub-project directly or indirectly use natural resources, e.g. wood from trees, etc.					
	Will the sub-project require sourcing of materials from nearby markets or will the Contractor require long travel to source and transport resource materials to site?					
	What type/kind/source of energy will be required during for the sub-project					
	Could the sub-project directly and/or through a third party: significantly consume or cause consumption of water (> 5,000 m <sup>3</sup> /day), or other resources?					
	Likely sources of water for the sub-project?					
	What are the envisaged sanitary requirements for the Contractor? No of Toilets, etc.?					
	Could the sub-project directly and/or through a third party: generate or cause generation of solid, liquid or gaseous wastes?					
	Could the sub-project directly and/or through a third party: use, cause use of, or manage the use, storage or disposal of hazardous materials and chemicals.					
	What are the waste streams to be generated by the sub-project?					
	What is the estimated quantity of waste to be generated by the sub-project?					
	Will the sub-project require liaison with local environmental and waste management agencies for the safe evacuation, transportation and disposal of wastes generated?					
	Will the sub-project result in offensive/odorous conditions?					
	Will the intervention result in changes in ground water level, water courses, flow of underground water?					
What is the level and effect of noise from the sub-project implementation?						

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Relevant ESSs	Specific Questions for Proposed Sub-projects/Intervention works	Yes/No/Probably	Risk Categorization			
			Low	Moderate	Substantial	High
	What are the general climatic changes effects on ambient temperature of the sub-project area					
	Will there be changes in groundwater level, water courses, flow of underground water.					
	Will the sub-project lead to the generation of fugitive dust?					
	Will the sub-project result in carbon emissions and noxious gases leading to an increase in baseline air quality?					
	Will the sub-project result in soil contamination and pollution					
	Will contaminants be released into surface waters within and around the sub-project corridors thereby leading to their contamination?					
<b>ESS 4: Community Health and Safety</b>	Could the sub-project pose risks and have potential negative impacts to the health, safety and security (e.g., potential risks associated with project-related civil works, potential for community exposure to water-borne, water-related, and vector-borne diseases) of the project-affected communities during its lifetime?					
	Will the presence of the Contractor and his workforce in the community lead to an increase in the spread of a) STIs and STDs b) COVID-19 c) other communicable diseases?					
	Will the sub-project activities increase the risk of SEA/SH therefore requiring strong and effective measures for preventing GBV?					
	Will the sub-project aggravate or exacerbate existing natural hazards in the project locations e.g. Erosion, Flooding, etc. and pose adverse CHS risks to communities?					
	Are there pre-existing security risks in the project locations?					
	Will the sub-project design contribute to new security risks?					
	Will the Contractor require to make his own security arrangements?					
	Is the sub-project naturally prone to climate vulnerability and will there be need for Emergency Preparedness and Response Measures? Describe the type of climate vulnerability e.g. flooding, erosion					
	Is the sub-project design climate resilient considering environmental, topographical, and climate factors/conditions in the project area?					
	Is there high chance for accident involving community during implementation of civil works?					
	Will the sub-project require recurrent sensitization on road safety, traffic safety and community safety measures?					
<b>ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>	Could the sub-project potentially involve land acquisition?					
	Will the sub-project result in low, moderate, substantial or high level of physical displacement?					
	Quantify the physical assets that may be displaced?					
	Will the sub-project result in low, moderate, substantial or high level of economic displacement?					
	Quantify the economic assets that may be displaced?					

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Relevant ESSs	Specific Questions for Proposed Sub-projects/Intervention works	Yes/No/Probably	Risk Categorization			
			Low	Moderate	Substantial	High
	Will the sub-project require the preparation and implementation of a RAP?					
	Will the sub-project require compensation of affected persons?					
	If yes, will livelihood restoration program be required? What kind?					
	Does the project GRM address all issues associated with resettlement, compensation and livelihood restoration or will the project require a site-specific GRM?					
<b>ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>	Will the sub-project transverse any Protected Area, Natural Reserve, National Parks, Forests, etc.?					
	What is the distance of the sub-project to the protected areas?					
	Will the proximity of the sub-project to the reserve require the SPIU to engage the authorities of the protected area to establish buffer zones?					
	Will the project result in habitat fragmentation, habitat loss or destruction to ecosystem services?					
	Will sub-project activities pose significant threat to endangered species in the project area?					
	Will the sub-project require partnership, liaison, consultations with local, national, international organizations working in the area on biodiversity.					
	Will sub-project activities affect aquatic or terrestrial life forms and organisms e.g. for Southwestern states – West African Manatee; North Central States – Crocodiles; North East – Hippopotamus, Hyenas, etc.; South East – Antelopes, Duikers, etc.; South West – Hares, Antelopes, etc.?					
	Could the sub-project directly or indirectly undertake any activities located in natural habitats?					
<b>ESS 8: Cultural Heritage</b>	Could any cultural heritage and/or sites be present in the project area or area of influence?					
	Would the sub-project directly deal with such resources?					
	What type of cultural heritage will be affected (tangible or intangible)? Explain??					
	Will the sub-project result in the excavation, earth moving activities that may eventually lead to the uncovering of chance finds?					
	Will the sub-project require the development of a Cultural Heritage Management Plan?					
<b>ESS 10: Stakeholder Engagement and Information Disclosure</b>	What is the nature, extent, level of stakeholder analysis required for the project?					
	Who are the stakeholders to be identified?					
	What kind of detail should the stakeholder mapping provide?					
	What is the estimated number of PAPs?					
	To what extent will Interested Parties be involved?					
	What is the level of influence of Interested Parties to the project?					
	Will stakeholder engagement require large, small groups, one-on-one interviews, FGDs, etc.					
What kind of information disclosure is anticipated in the project?						

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Relevant ESSs	Specific Questions for Proposed Sub-projects/Intervention works	Yes/No/Probably	Risk Categorization			
			Low	Moderate	Substantial	High
<b>ESS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>	What is the rating of the sub-project according to the E&S risk classification?					
	Will the subproject cause significant negative environmental impact? Are these impacts sensitive, widespread or unprecedented? Please provide a brief description					
	Is the impact beyond the project area? Is the impact of project implementation beyond the scope of planning?					
	Are these major negative environmental impacts irreversible? Please provide a brief description					
	Based on the E&S Risk classification of the project what is the nature of the E&S assessment required in accordance with national laws and requirements of the ESSs		No Assessment	Site-Specific E&S Assessment	Site-Specific or Full E&S Assessment	Full E&S Assessment

**\*\*\*Estimated Magnitudes shall include one of Low, Moderate, Substantial or High\*\*\***

**Proceed to Prepare Screening Report and Terms of Reference for Consultancy Service**



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# ANNEX 3 – Terms of Reference (ToR) of the ESIA Study & Structure of the ESIA Report

## TERMS OF REFERENCE (ToR) FOR THE PREPARATION OF AN ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) FOR RURAL ACCESS & AGRICULTURAL MARKETING PROJECT – SCALE UP (RAAMP-SU)

### Project Background

The Federal Government of Nigeria (FGN) has requested the World Bank (WB) to increase the number of states participating in the current Nigeria Rural Access and Agricultural Marketing Project (RAAMP). Presently, there are 19 pioneer participating states under RAAMP, however the next phase of the RAAMP program, which will be the Rural Access and Agricultural Marketing Project – Scale Up (RAAMP-SU) will be open to all states in Nigeria (36 states including the Federal Capital Territory (FCT)). The project will be guided by the Government's Rural Travel and Transport Program (RTTP). The lead implementing agency is the Federal Department of Rural Development (FDRD) of the Federal Ministry of Agriculture and Food Security (FMAFS). The Federal Project Management Unit (FPMU) which is currently overseeing RAAMP will direct and coordinate the affairs of the RAAMP-SU on behalf of FDRD, while the state governments of the respective participating states will implement the RAAMP-SU through State Project Implementation Units (SPIUs).

### Project Development Objective

The Project Development Objective (PDO) of RAAMP-SU is to improve rural access while strengthening the financing and institutional framework for a sustainable rural road network in participating States. The RAAMP Scale-Up will focus on connecting rural communities to local agricultural markets such as roadside agro-logistics hubs, social amenities such as schools and hospitals, introduce innovative approach of Green Roads for Water into the project design to enhance the resilience of the project as well as promote social cohesion at rural level.

The Nigeria road network is relatively dense consisting of about 194,000 km of roads. This includes 34,000 km of federal roads, 30,000 km of state roads and 130,000 km of registered rural roads. The road density is about 0.21 km of roads per square kilometre. In spite of the relatively high road density, the rural accessibility index for Nigeria (defined as the proportion of the rural population living within 2 kilometres away from an all-weather road) is low, at only 25.5 percent, leaving about 92 million rural dwellers unconnected [RAAMP Project Appraisal Document, 2019]. Rural access is limited where the poor population is concentrated. These considerations demand the expansion and improvement of rural road network, and, also, conservation of rural road/transport assets.

### Project Components

The RAAMP-SU has been designed to have four (4) components; these are summarized below.

**Component A: Improvement of Resilient Rural Access:** The aim of this component is to ensure year-round rural access to socio-economic services, agriculture markets and job opportunities through the rehabilitation/upgrading of selected rural roads and their resilience to climate change impacts in participating states.

The component comprises three subcomponents:

**Subcomponent A.1: Climate-informed Rural roads rehabilitation/upgrade:** About 3000 km of rural roads to and from socio-economic community infrastructure will be rehabilitated or upgraded by the project as to enhance the resilience of the rural road network to climate change impacts and ensure year-round connectivity. The rural roads will be selected for rehabilitation or upgrading considering climate change related hazard levels, exposure and vulnerability of the rural roads, ancillary assets and of socio-economic benefits to communities

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served. The rehabilitation works will include climate resilience and flood protection measures, such as, repairing, and strengthening of bridges and culverts, slope stabilization, erosion protection improvements, road surface repairs or resurfacing and other engineering solutions. As much as possible, the project will adopt technical consideration facilitating the flow of water from surface and drainage of the main and upstream to rapidly capture flood waters and recycle them into agriculture activities. The project will also explore techniques from the Green Roads for Water approach and any additional physical measures, as needed. The envisaged civil works will also focus on local resource-based solutions/materials that are compatible with the local context/conditions.

**Subcomponent A.2: Technical support for Rural Roads rehabilitation/upgrade** required for the successful implementation of subcomponent A.1. including: (a) technical design (including consulting services for incorporating nature-based solutions and “Green Roads for water” approach), environmental and social safeguards instruments, and bidding document for project related activities; (b) monitoring and supervision of the implementation of the civil works, including the Occupational Health and Safety plan (OHS) and Road Safety Management during works as well as the resettlement action plan (RAP).

**Subcomponent A.3: Social inclusion and promotion of gender equality** will be fully integrated as part of the project through: (a) the scale up of the Maternal New-born and Child Emergency Transport Services (MANCETS) initiatives in participating states. Converted three-wheelers into mini ambulances, will be handed to health facilities identified along the roads to be rehabilitated and will contribute to reduction of rural maternal mortality and facilitate access of giving birth mothers to Primary Health Care PHCs centers. The National Emergency Medical Service and Ambulance System (NEMSAS) will support the project in the implementation and monitoring of this activity. (b) The establishment of an apprenticeship program within the RARAs to train young men and women engineers, with a particular focus on gender inclusion. As part of the program, a stipend will be provided to participants complemented by a mandatory rotation within several departments of the institution and mentorship by senior engineers. A non-bidding MOU between the RARAs, several engineering universities and contractors will be signed to facilitate the school to work transition.

**Component B: Climate Resilient Asset Management:** The aim of this component is to carry out climate informed maintenance activities to enhance the resilience of the rural road network, building on sector and institutional reforms established by the parent project, and the enhancement and of established climate resilient road asset management systems NiTRIMS in newly established state road authorities (RARAs).

This component comprises of two sub-components:

(i) **Subcomponent B.1: Asset management improvement and Resilience Scale up.** This subcomponent will finance: (a) climate risk informed routine and periodic maintenance of 3500 km of rural roads identified through the Annual Road Maintenance system (ARMP) by the established RARA in participating states; (b) technical design, environmental and social safeguards instruments, and bidding document for project related maintenance activities; (c) monitoring and supervision of the implementation of maintenance works.

(ii) **Subcomponent B.2: Development and implementation of a climate risk informed road asset management system.** This component entails: (a) The revision of road maintenance protocols to integrate climate resilience considerations in rural road maintenance activities (b) The development and integration of a climate risks module in the NiTRIMS system and the compilation and collection of the data required, including the establishment of data collection and compilation protocols, establishment of inter-agency cooperation agreements, and other provisions for continued system updates. (c) The addition of poverty, health, and education data (collected through satellite imagery and other sources of geospatial Big Data) to the NiTRIMS system layered with climate considerations for most climate vulnerable population segments, in road prioritization for rehabilitation and maintenance. (d) Rolling out use of NiTRIMS in all 36 states (building on activities from previous RAAMP phases, and (e) RARAs staff training and strengthening their capacities for adoption of NiTRIMS (with the additional climate and social considerations).

**Component C: Institutional Strengthening and Project Management:**

The component comprises of two sub-components:

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- (i) **Subcomponent C.1: Project Management** which will support project operating costs, training, project monitoring and impact evaluation activities. It will also cover TA consultancies including support to the Department of Lands under the Ministry of Agriculture and Food Security to address the resettlement activities systematically. This sub-component will also support project risk mitigation activities including third party monitoring for sexual exploitation and abuse (SEA), gender, Grievance Mechanism (GM).
- (ii) **Subcomponent C.2: Institutional Strengthening and sector reforms.** This entails the provision of technical advisory services and capacity strengthening activities, building on previous state-level sector reforms supported in earlier stages of the RAAMP program, as to ensure the sustainability of these institutions. Specifically, it will aim to cover: (a) Continuation of state-level road sector reforms activities, including identification, evaluation, and implementation of measures to improve institutional and financial sustainability of the newly established entities (RARA & SRF) in participating states. (b) TA to develop a climate risk assessment and management framework for the rural road network to inform transport planning and the selection of priority roads for investment (rehabilitation and upgrading). This component will also entail the development and operationalization of a climate risk management plan for rural roads (and served rural communities) at state level and at federal level, for mapping of possibilities of adoption of the “Green roads for water” approach. This subcomponent will also finance RARAs building capacities to conduct local level climate risk assessments as to inform road civil works related to road rehabilitation, upgrading, construction, and maintenance. Provision of TA and training on the revision of procurement protocols to integrate climate risks and resilience considerations in road construction/rehabilitation/upgrading designs, and incorporation of climate risks and resilience considerations in the rural roads asset management system. Support will also entail the development of national guidelines on climate resilient design standards for rural roads, bridges construction, rehabilitation, upgrading/retrofitting, and maintenance as well as the development of climate resilient technical standards. (c) Rural road safety’s institutional strengthening both on Federal and state level. (d) Support for the operationalization of the national rural road directorate (NDRR) to be mandated under the newly established national Agriculture development Fund (NADF), including operational budget, technical support for governance and institutional management, as well as building capacities related to climate risk management and incorporation of climate considerations in decision making

### Component D: Contingent Emergency Response

The component will address emergency needs as agreed with the government following an officially declared natural disaster. This component allows for possible reallocation of uncommitted project financing in the event of a natural disaster. As per standard Bank procedure, a CERC Manual and an Emergency Action Plan would be prepared separately and approved by the Bank, as a disbursement condition for the CERC. If this component is activated, the project will be restructured to reallocate funds, and to revise the PDO, indicators, and implementation arrangements as needed. The CERC activities will be carried out in accordance with the CERC Manual and the Emergency Action Plan.

### Purpose for the ESIA

The objective of this assignment is to conduct comprehensive environmental and social assessments to identify potential risks and impacts associated with sub-project activities. The aim is to prepare site-specific instruments for managing any adverse social and environmental effects that may arise from these activities.

Prior to the commencement of civil works for rehabilitation sub-projects, it is imperative to conduct an Environmental and Social Impact Assessment (ESIA) to evaluate the potential environmental and social effects of the construction activities. The ESIA will guide the development of an Environmental and Social Management Plan (ESMP), which will provide detailed procedures for identifying and addressing the anticipated social and environmental risks and impacts associated with the proposed construction works. These impacts will be site-specific, reversible, and manageable through the implementation of appropriate mitigation measures.

Due to the potential environmental and social risks and impacts associated with RAAMP-SU, the following Environmental and Social Standards applies:

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ESS 1: The ESIA should encompass a thorough environmental and social management plan for environmental and social risks and impacts associated with the RAAMP-SU project. This includes identifying potential risks to biodiversity, ecosystems, water resources, and local communities, as well as proposing mitigation measures to minimize adverse E&S risks and impacts and enhance positive outcomes, consistent with ESS 1.

ESS 2: The ESIA should include a comprehensive assessment of labor and working conditions throughout the project lifecycle. This entails evaluating employment practices, worker safety, working hours, remuneration, and social protection measures, as well as proposing measures to ensure compliance with relevant labor laws and international standards, in alignment with ESS 2.

ESS 3: The ESIA should include an evaluation of resource efficiency measures, such as the sustainable use of materials and energy, waste management practices, and pollution prevention strategies. It should identify opportunities to minimize resource consumption and environmental impacts throughout the project lifecycle, consistent with ESS 3.

ESS 4: The ESIA should assess potential impacts on community health and safety, including noise, air, and water pollution, GBV/SEA/SH/VAC and propose mitigation measures to address these impacts in accordance with ESS 4.

ESS 5: The ESIA should evaluate potential impacts on land use and land acquisition, including any displacement of communities or loss of livelihoods, and propose measures to minimize adverse impacts in line with ESS 5.

ESS 6: Where the screening has shown that the subprojects will impact on biodiversity, the TOR should recommend specific biodiversity measures or a Biodiversity Management Plan to address these impacts in accordance with ESS 6.

ESS 8: The ESIA should assess potential impacts on cultural heritage sites, physical resources and propose measures to mitigate adverse impacts in accordance with ESS 8.

ESS 10: The ESIA should evaluate potential impacts on indigenous peoples' rights, including any adverse effects on their livelihoods or cultural practices, and propose measures to address these impacts in line with ESS 10.

### Description of the sub-project

**SPIUs to include a brief description of the project environment.**

### Scope of Works

The scope of work for the consultancy service is to develop an Environmental and Social Impact Assessment that covers the identified sub-projects/intervention works which should detail the potential impacts associated with the proposed rehabilitation works and set out mitigation measures required to mitigate any potential impacts in the project activities.

The ESIA will be utilized by the contractor(s) to be commissioned by RAAMP-SU in the preparation of the required Contractor's ESMP (C-ESMP), which will form the basis of the site-specific management plan prior to works commencing. The ESIA will be used by the contractor to address all occupational health and safety (OHS) issues and community health and safety (CHS) issues associated with the proposed construction works. The preparation of this ESIA is an obligation under the World Bank's Environmental and Social Standard requirements as outlined in the RAAMP-SU ESMF. Generally, it is expected to provide guidance and recommendations for environmental and social safeguards as well as monitoring throughout the construction of the proposed project.

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The consultant will work in close collaboration with the RAAMP-SU SPIU environmental, social, GRM, GBV officers as well as the infrastructure engineers and other stakeholders as identified by the SPIU.

In that respect the sequencing of the technical/feasibility studies and the ESIA will be critical. The consultant (firm) will have to receive the draft technical/feasibility studies in order to take into account the technical variants of the proposed activities and also bring out clearly any major constraint that may arise due to the environmental and social risks on the ground for design consultant to consider while finalizing documents for the rehabilitation activities.

In each project site, the consultant (firm) will visit the roads proposed for rehabilitation. The consultant will take into account the proposed draft engineering designs. The consultant will consider all the ESSs relevant to RAAMP-SU as highlighted above and selects the management strategies needed to ensure that environmental risks and impacts are appropriately mitigated.

Tasks of the consultancy assignment include the following:

- Review the existing Project Appraisal Document (PAD), Environmental and Social Management Framework (ESMF), Environmental and Social Commitment Plan (ESCP) and Resettlement Policy Framework (RPF) prepared for RAAMP-SU.
- Review Environmental and Social Standards that are relevant to RAAMP-SU.
- Review of preliminary engineering designs and feasibility studies for the subprojects.
- Review the applicable policies, legal, administrative, and institutional framework.
- Environmental and Social Description of the project environment
  - Describe the existing status of the subprojects and project communities include schematic diagrams, maps, figures, tables and pictures.
  - Describe the physical (soil), biological (flora, fauna, endemic and endangered species), and social economic conditions in the subproject areas.
  - Sample collection
- Identify and summarize all anticipated significant adverse environmental and social risks and impacts from the proposed subproject activities; including the impacts of the proposed civil works/labour influx and associated impacts such as Sexual exploitation and abuse/sexual harassment (SEA/SH); Occupational Health and Safety; Community Health and Safety; Displacement and conflict/fragility; other broader social issues such as risk of elite capture; social exclusion of the most marginalized/vulnerable (e.g. persons with disabilities, IDPs, survivors of sexual violence); etc.
- Analysis of Project Alternatives – This section should include the examination of various alternative approaches to the project, considering their potential environmental, social, and economic risks and impacts. The alternatives could include but not limited to: “Do-Nothing” alternative”, Design alternatives, Alternative to project siting/location, Operational and technology Alternatives, Alternatives to project timing.
- Prepare an Environmental and Social Management Plan (ESMP). The ESMP should capture:
  - The potential environmental and social impacts resulting from project activities
  - The proposed mitigation measures;
  - The institutional responsibilities for implementation;
  - The monitoring indicators;
  - The institutional responsibilities for monitoring and implementation of mitigation measures;
  - The costs of activities
- Stakeholder Engagement including Grievance Redress Mechanism: Stakeholder engagement process focusing on free, prior and informed consultation (FPIC) shall be conducted with the community and other stakeholders, and take into account modalities of vulnerable and marginalized communities may be involved. The consultation shall include prior disclosure of information in a manner accessible and

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understandable to communities, key informant interviews, focus group discussion (male& female, youth) and public consultation. The consultation shall be documented with required facts, figures and evidence including participant list with contact details, photographs. Information shall be disclosed as per the requirement of National Regulations and the WB ESSs. This section shall describe the grievance redress mechanism. The GRM of RAAMP will support but not replace grievance mechanisms established at subproject level.

- Conclusion and Recommendation: Provide a comprehensive conclusion and recommendation section summarizing the findings of the ESIA, including the identification and assessment of environmental and social impacts, effectiveness of proposed mitigation measures, and compliance with relevant regulations and standards. This section should also present recommendations for minimizing adverse impacts, enhancing project benefits, and improving environmental and social performance throughout project implementation.

### Duration

The Consultant shall prepare time schedules to be submitted to the SPIU in accordance to this TOR. The time frame for the entire consultancy services is within six (6) months of contract signing.



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### Consultant Team

The Consultant shall provide experienced personnel to carry out the assignment with the following minimum qualifications:

S/N	Team Member	Qualifications	Experience in years
1.	Team leader - Environmental Specialist	MSc in Environmental Science or related field	Minimum 10 years of experience in the preparation of environmental and social assessment reports (ESIAs/ESMPs/RAP). – Participation in similar role in at least three World Bank funded projects in the last 5 years.
2.	Environmental Specialist II	BSc in Environmental Science or related field	At least 5 years working experience with specific experience in the preparation of ESIA/ESMP/RAP reports. – Participation in similar role in at three World Bank funded projects in the last 3 years.
3.	Social Specialist	MSc in Social Science, Sociology, or Anthropology	At least 8 years of experience in conducting social impact assessments for development projects,
4.	Environmental Engineer	BSc in Environmental Engineering or related discipline	6 years of experience in environmental engineering, with expertise in assessing and managing environmental impacts of infrastructure projects.
5.	Ecologist	PhD or Master's degree in Ecology, Biology, or related field	Minimum 10 years of experience in ecological assessments and biodiversity conservation. Knowledgeable about ecosystem services, habitat restoration, and wildlife management.
6.	GIS and Remote Sensing Specialist	BSc in Geographic Information Systems (GIS), Remote Sensing, or Geoinformatics	6 years of experience in spatial analysis and mapping for environmental assessments. Proficient in GIS software and satellite imagery analysis.
7.	Occupational Health and Safety Specialist	BSc in Occupational Health and Safety or related field	5 years of experience in occupational health and safety management, preferably in infrastructure projects. Knowledgeable about hazard identification, risk assessment, and safety protocols.
8.	Stakeholder Consultation Specialist	BSc in Social Science/Mass Communication or related discipline	At least 5 years working experience with specific experience in similar assignment. – Participation in similar role in at least three World Bank funded projects in the last 3 years.
9.	Gender Based Violence (GBV) Specialist	BSc Sociology or related discipline	At least 5 years work experience with specific experience in similar assignment. – Participation in similar role in at least three World Bank funded projects in the last 3 years

### Deliverables

**Inception Report:** An Inception report (3 hard copies and 1 soft copy) detailing the work plan for execution, review of relevant project documents and preliminary impacts identified shall be submitted to the SPIU one (1) month after contract signing.

**Draft Report:** A draft ESIA report (3 hard copies and 1 soft copy) shall be submitted to RAAMP-SU SPIU for review four (4) months from the date of contract signing.

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**Draft Final Report:** A Draft Final ESIA report (3 hard copies and 1 soft copy) shall be submitted to RAAMP SPIU considering all comments from the FPMU and World Bank for review five (5) months from the date of contract signing.

**Final Report:** A Final ESMP report (3 hard copies and 1 soft copy) shall be submitted to RAAMP SPIU considering all comments from the FPMU and World Bank has been incorporated into the report, six (6) months from the date of contract signing.

### Report Outline

- **Table of Contents**
- **List of Tables**
- **List of Figures**
- **Abbreviations and Acronyms**
- **Executive Summary**
- **Chapter 1: Introduction**
  - Background
  - Project Development Objectives
  - Project Components
  - Rationale for the ESIA
  - Objectives of the ESIA
  - Technical Approach and Methodology to the ESIA
- **Chapter 2: Policy, Legal and Administrative Frameworks**
  - Federal Level
  - State Level
  - Applicable International legal and administrative frameworks
  - World Bank Environmental and Social Standards
  - Assessment of the WB ESSs and Regulatory Framework for Environmental and Social risks and Impacts
- **Chapter 3: Project Description**
  - Introduction
  - Description of the Project
  - Proposed Works (Project Schedule, Construction Materials, Labour)
- **Chapter 4: Analysis of Project Alternatives**
  - Do-Nothing” alternative”
  - Design alternatives
  - Alternative to project siting/location
  - Operational and technology Alternatives
- **Chapter 5: Environmental and Social Description of the project environment**
  - Overview of Project Locations
  - Site-specific Biophysical and Social Description of the Project Areas
  - Assessment of Environmental Media in the sub-project areas (Water and Air Quality, Noise and Soil Analysis)
  - Description of social economic conditions in the subproject areas.
- **Chapter 6: Identification and Assessment of Environmental and Social Risks and Impacts**
  - Methods and techniques used in assessing and analyzing the environmental and social risks and impacts of the proposed project
  - Discussion of the potentially significant adverse environmental and social risks and impacts of the proposed project
  - Discuss the Climate Change Impact and its Mitigation Measures

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- Labour influx
- Description of the GBV risk (including a GBV Action Plan), and more broadly the ESHS expectations, and include appropriate mitigation measures. The basis of the GBV Action Plan should be provided as part of the ESMP.
- **Chapter 7: Environmental and Social Management Plan**
  - Institutional Arrangement for Implementation
  - Environmental and Social Management Plan
  - Capacity Building and Training
  - Implementation Schedule
  - Reporting
  - Disclosure
  - Budget Estimate
- **Chapter 8: Stakeholder Engagement**
  - Stakeholder Engagement Plan
  - Presentation of consultations with relevant stakeholders and affected persons
- **Chapter 9: Grievance Redress Mechanism**
  - Description of grievance redress mechanism address situations of conflicts or disagreements about some of the project activities
- **Chapter 10: Conclusion and Recommendations**

### Annexes

- Annex 1: Terms of Reference for the ESIA
- Annex 2: Socio-Economic Data Collection Instruments
- Annex 3: Attendance at Community Consultations
- Annex 4: General Environmental Management Conditions for Construction Contracts
- Annex 5: Waste Management Plan
- Annex 6: Occupational Health and Safety (OHS) Plan
- Annex 7: Borrow Pit Management Plan
- Annex 8: Sample Outline for Cultural Heritage Management Plan & Chance Find Procedure for the Protection of Physical Resources
- Annex 9: Code of Conduct for Gender-Based Violence
- Annex 10: Campsite Management Plan
- Annex 11: Labour Influx Plan
- Annex 12: Community Affairs, Safety, Health, Environment and Security (CASHES) Plan
- Annex 13: Traffic Management Plan (TMP)
- Annex 14: Sample Outline for Security Risk Management Plan

### Payment Milestones

20% upon submission of Inception Report

25% upon submission and acceptance of the Draft ESIA Report

25% upon submission and acceptance of the Draft Final ESIA Report

30% upon submission of the Final cleared ESIA Report

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# ANNEX 4 – Guidance for Drafting a Security Management Plan

*There are many ways to structure a Security Management Plan. The topics below are commonly included in comprehensive Security Management Plans. These can be used by companies developing their own security plans in-house, or by companies evaluating the security plans delivered by external consultants.*

*Text in black is sample text to use or modify. Text in **blue italics** is guidance to be considered and then replaced or removed.*

## A. Objectives, Mission, and Approach

### 1. Objectives of a Security Management Plan

- The plan is designed to guide the company's actions at the project in protecting against and mitigating risks of a security (as well as a human rights) nature that could threaten communities, employees, facilities, and ability to operate, as well as the reputation of the company and its global operations.
- The plan provides direction, organization, integration, and continuity to the security and asset-protection program. It is written with the understanding that effective security and regard for human rights are compatible.
- The systems outlined in the plan will be maintained throughout the lifetime of the project.
- The plan will be reviewed on an **annual** basis and after any change in the security-related context in which the project operates.

### 2. Mission of Company Security

- The mission of company security is to ensure that all staff, contractors, and visitors working at the project site and in the project area are able to do so in a safe and secure environment. It also ensures that all facilities are kept safe and secure, and that all project operations are unhindered. It provides effective security-operational support to all project activities.
- Project security will approach its mission with the understanding that good security and respect for the human rights of employees and communities are fully compatible, as reflected in security forces' behavior, communication, use of force, etc.
- *If applicable, describe the relationship between and relative responsibilities of project security and other third-party contractors and affiliated companies, such as Engineering, Procurement, and Construction (EPC) contractors.*

### 3. Approach of Project Security

*Discuss the project's overall integrated approach for security. For example:*

- Many security risks flow out of both inherent local social issues, such as ethnic tensions, and unrecognized issues between the project and local communities. As such, project Operations, Government Relations, and Community Relations staff are all involved in the security process.
- Key stakeholders from local communities are also included in assessing security risks and in considering how to mitigate and manage those risks. Security arrangements are transparent, to the extent possible and appropriate, and are included in disclosure to and consultation with the local communities.
- The project's grievance mechanism is an important tool for reducing potential security risks.

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### B. Policies and Standards

#### 1. References to Company Policies and Documents

The following company policies and documents guide security management:

- Project Security Risk Assessment
- Corporate Security Policy
- Ethics *[and/or Human Rights]* Policy
- Use of Force Policy

#### 2. Other Relevant Laws and Standards

The company adheres to the following guidelines, standards, and laws:

- National laws
- Applicable international laws
- Environmental and Social Standards
- Voluntary Principles on Security and Human Rights
- UN Code of Conduct for Law Enforcement Officials
- Basic Principles on the Use of Force and Firearms by Law Enforcement Officials

### C. Overview of Security Situation

#### 1. Project Setting

*Provide a general description of the national and project-area security environment. This would include descriptions of:*

- *Relevant demographic information, such as population age breakdown, unemployment, poverty, and inequality;*
- *Crime levels and type;*
- *Endemic political, social, or labor unrest;*
- *Terrorism or insurgency; and*
- *General attitude toward the project and associated issues.*

#### 2. Security Risks

*(Attach security risk matrix and Security Risk Assessment as annexes.)*

*This section should be based on the project Security Risk Assessment and should discuss:*

##### Internal Risks

- *These are caused by the illegal, unethical, or inappropriate behavior of project personnel or those directly affiliated with it.*
- *Most common risks would be employee theft, workplace violence, and labor unrest, potentially with associated sabotage.*
- *A security response might result in risks to employees or other individuals.*

##### External Risks

- *These are caused by the actions of people outside the project who seek to take advantage of opportunities presented by the development and operation of the project.*
- *These may include common criminal activity; disruption of the project for economic, political, or social objectives; and other deliberate actions that have a negative impact on the effective, efficient, and safe operation of the project. In extreme cases, these could include terrorism, armed insurgency, coups, or war.*

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- *A security response might result in risks to communities or individuals.*
- *The presence of security forces might pose additional risks to communities or individuals.*

### 3. Security Arrangements

#### Private Security

- *Describe who provides basic project-site protection, such as the project private security force (in-house or contracted).*

#### Public Security

- *Describe briefly the local public security forces that would be called on to assist the project. This would briefly outline location, capabilities, mission, and relation to the project.*

### D. Physical Security

*Provide an overall description of the project security approach and systems. More detailed design information (such as exact CCTV camera positioning) belongs in an annex. Ideally this section includes a description of the project's:*

- **Security Barriers**—*such as fences, gates, locks, fortifying facilities, and means of access control.*
- **Surveillance/Electronic Security Systems**—*including CCTV, Intrusion Detection Systems, and surveillance guard posts and patrols.*
- **Security Control Center**—*describing the means for bringing together reporting and controlling response.*

### E. Security Operating Procedures

*Provide a brief description of key security operating procedures. Detailed standards and procedures that provide a transparent and accurate process for managing security functions (such as checklists) should be contained in an annex. Key procedures should include a brief description of the following (as appropriate) and how they fit together:*

- **Boundary Security**—*how security will maintain control of the project's perimeter and channel people to access-control points.*
- **Access-Point Operations**—*the types of checks and screening for both people and vehicles at gates or other access points. Include entry and exit searches and purpose, and who is subject to it. Outline key ground rules, such as:*
  - Searches will only be conducted by security personnel who have received instruction and information regarding the procedure and the legal aspects of search and seizure;
  - Body searches will only be conducted by security personnel of the same gender.
- **Incident Response**—*how security will respond to an incident and who is responsible for responding. Responses should be based on proper and proportional use of force. Describe the role of public security, including when they are called and by whom.*
- **Security Patrols**—*what patrols check and how often.*
- **Travel Security**—*(if applicable) any special procedure for offsite travel security.*
- **Materials Storage and Control**—*(if applicable) any controls over the transport, inventory, and maintenance of any commercial explosives or chemicals (e.g., cyanide) necessary for the project. Note that these are stored in accordance with appropriate national laws and regulations.*
- **Information and Communication**—*procedures for categorizing, handling, and controlling sensitive information.*



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- **Firearms Security**—*project policy regarding firearms onsite, as well as the responsibilities and procedures for issuing and storing any security firearms, ammunition, and less lethal weapons. This should include:*
  - *Location for storage,*
  - *How weapons are secured during storage,*
  - *Records for issuance,*
  - *Who they may be issued to,*
  - *Safeguarding while in possession of the guard, and*
  - *Audits.*

*Include in an annex detailed standards and procedure for weapons issuance, storage, and audit.*

## F. Security Supervision and Control

### 1. Management Structure and Responsibility

- *Explain the overall lines of control, accountability, and supervision for the security effort.*
- *Define who supervises daily performance of the security-guard force and who has authority.*
- *Describe who has overall responsibility for security information sharing and communication.*

### 2. Responsibility for Conducting Security Risk Assessments

- *Discuss the responsibilities for conducting risk assessments, who participates in them (e.g., senior management, Community Relations team, key stakeholders from communities, etc.), and what the assessments cover.*

### 3. Cross-Functional Coordination

- *Describe interdepartmental coordination.* Community Relations, Human Resources, and Government Relations are important partners in project security.
- *Outline any planning/coordination activities between security and other departments, which may range from participation in security risk assessments to weekly meetings.*

## G. Private Security Force Management

### 1. Security-Guard Force Role

- Private security's role is to provide preventive and defensive services, protecting company employees, facilities, equipment, and operations wherever they are located.
- Private security personnel have no law-enforcement authority and will not encroach on the duties, responsibilities, and prerogatives reserved for public security forces.

### 2. Provision and Composition of the Security-Guard Force

*Describe whether members of the guard force are direct employees or from a third-party security provider.*

In developing its guard force, the project (*or its third-party provider*) will:

- Hire in accordance with national labor laws,
- Give preference in hiring to qualified local candidates where possible, and
- Promote diverse hiring practices, including gender and indigenous inclusiveness.

### Security Contractor Management (if applicable)

- The project assumes responsibility for the oversight of security.

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- *Describe how the project will actively set the standards for and oversee private security contractor selection and performance.*
- **Selection**—In selecting a security provider, the project will perform proper due diligence that will include screening for institutional reputation, training standards, procedures for screening employees, and any history of allegations of human rights abuses or other criminal behavior.
- **Contract provisions**—*Include any provisions (e.g., for uniforms and equipment).*
- **Active oversight of contractor performance**—To ensure proper performance, the project will undertake audits, assist with training, inquire into any credible allegations of abuse or wrongdoing, and monitor site performance on an ongoing basis.

### 3. Security Guard Background Screening

- The project *will perform and/or require its security provider to perform* valid background checks on potential employees to screen for any allegations of past abuses, inappropriate use of force, or other criminal activity and wrongdoing.
- No guard or employee on whom there is credible negative information on these checks will serve on the project.
- These checks will be documented and maintained in individual personnel records, which are subject to review by the project.

### 4. Security-Guard Force **Equipment**

- *Describe equipment to be provided to guards, including radios, non-lethal weapons, and any firearms and ammunition. Guards should only be armed if it is justified by the Security Risk Assessment and is the only viable and effective mitigation measure for a clear threat.*

### 5. Security Guard Use of Force

- The use of force by private security is only sanctioned when it is for preventive and defensive purposes in proportion to the nature and extent of the threat.
- When it is necessary to arm the guard force, the project will ensure that those who are armed exhibit high levels of technical and professional proficiency and clearly understand the rules for the use of force. This means being properly trained on using force effectively, proportionally, and with respect for human rights.

### 6. Security-Guard Force Training

- The project commits to maintaining the highest standards of guard-force technical and professional proficiency through a comprehensive training program. *Outline the training responsibilities of either the security provider or the company, as applicable.* The project will review any third-party security provider's training program and, where necessary, augment the training through the use of qualified third parties or direct instruction.
- The project will ensure that security personnel receive procedural or knowledge training in:
  - Basic guarding skills,
  - Guard-post orders and procedures,
  - Proper conduct and ethics/human rights,
  - Rules of engagement,
  - Rules for the use of force,
  - Adequate weapons training (as applicable), and

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- Health, Safety, and Environment (HSE) mandatory training.
- *Outline how training completion records will be kept.* Training will be open to inspection/audit.

## H. Managing Relations with Public Security

### 1. Public Security Force Role

- Public security forces have responsibility for responding to and investigating all criminal activity. They also have the primary responsibility for controlling demonstrations or civil disorder. For incidents involving criminal violations or potentially violent confrontations or demonstrations, they are requested to respond to protect company personnel and property.

### 2. Engagement with Public Security Forces

- *Describe how the project will maintain constructive relations with public security (typically the police and, under certain circumstances, the military) operating in the project area or responsible for assisting project security. The depth of this section will vary with the security arrangements involving local public security forces.*
  - *If it is only normal law-enforcement activities, such as investigating reported crimes or responding to an incident, ongoing engagement or liaison activity may be sufficient.*
  - *If public security forces are actually assigned to the project to provide some aspects of security, then this section should describe provision of any equipment or other support, the role of the public security force, joint contingency planning, and coordination mechanisms.*
  - *It should also discuss the establishment of any memorandum of understanding necessary to make the arrangements transparent.*

### I. Incident Reporting and Inquiry

- *Outline the grievance mechanism, reporting requirements and structure, and inquiry protocols about security incidents, use-of-force incidents, and allegations of abuse, misconduct, or other wrongdoing by security personnel.*
- *Discuss the responsibilities and timelines for conducting inquiries on allegations and incidents, including:*
  - The company makes a commitment to expeditious inquiry into any allegations of abuse or wrongdoing.
  - The private security contractor may conduct its own inquiry of an incident or allegation, but the project can conduct an independent inquiry on any serious abuse allegation or use-of-force incident.
  - The inquiry findings will include a recommendation of any appropriate disciplinary action and policy or procedure changes that may be needed.

### J. Community Engagement

- *Describe how the company will engage with communities on matters relating to security. This may be done in coordination with the Community Relations department, depending on the project.*
- The project acknowledges that it may have an impact on communities and strives to mitigate risks. It will do this by providing:
  - Regulations for guard offsite behavior,
  - Protocol for arrangements with public security,
  - Shared information on security arrangements (as appropriate), and
  - Grievance mechanism for community members to report issues.

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# ANNEX 5 – Emergency Response Plan during Projects/Construction

Projects in Road Construction Sector is widely recognized as one of the accident-prone activities. It should be understood that the size, materials, environment and complexity of sub-projects/intervention works significantly contributes to the various hazards and risks associated with road construction activities. In majority, slow response, lack of resources, or the absence of trained personnel at construction site will lead to chaos in an emergency. To minimize human suffering and financial losses, it is therefore strongly recommended to develop the emergency response plan before commencement of project.

The Emergency Response Plan shall include the following considerations:

### 1. Statutory Requirements

The entity shall ensure compliance of applicable National and State Rules & Regulations such as National Emergency Management Agency (Establishment, etc.) Act of 2004, NEMA National Disaster Response Plan, the Factories Act, 1987, etc. Applicability and status of compliance should be made part of Emergency Response Plan.

### 2. Pre-Emergency Planning

a) The process of hazard identification and risk assessment involves a thorough review construction activities such as Excavation, Structural Work, Laying of Asphalt & Concreting, Road Work, Cutting/Welding, Working in Confined Space, Proof/Pressure Testing, Working at Heights, Handling & Lifting Equipment, Vehicle Movement, Electrical, Demolition, etc. to identify potential On-Site & Off-Site emergencies.

b) Listing out On-Site (Level I & II) and Off-Site (Level III) Emergency Scenarios based on the consequences and resources.

### 3. Emergency Mitigation Measures

The entity shall have an effective Health, Safety and Environment Management System in place to ensure safety during construction activities: -

- a) Health, Safety and Environment (HSE) Policy
- b) Duties & Responsibilities of Contractor/Executing Agency
- c) Site planning and layout
- d) Deployment of Safety Officer/Supervision
- e) Safety committees with fair participation of workers;
- f) Safety audits and inspections shall be carried out with the help of prescribed checklists.
- g) Work permit system
- h) Personal protective equipment
- i) Safety awareness and training etc.

### 4. Emergency Preparedness Measures

- a) Emergency Drill & Exercise on identified scenarios and its evaluations
- b) Organizing trainings on Emergency Response
- c) Mutual Aid

### 5. Emergency Response Procedures

The entity shall prepare well planned and documented procedures to ensure prompt response. The action plan may be documented for all emergency scenarios, identified as On-site and Off-site.

### 6. Emergency Organization and Responsibilities

The Contractor shall formulate organization chart (emergency action flow chart) and define the roles and responsibilities of key personnel for handling the emergency situation effectively at project site. The contractor

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is shall also promptly seek the assistance of the relevant NEMA/SEMAs, Fire Services, etc. where necessary to initiate and follow up with emergency response proceedings.

### 7. Resources for Controlling Emergency

I) The available emergency control systems and facilities within the project/construction site shall be as under: -

- (a) Fire and gas detection system
- (b) Fire protection and firefighting system (Active and Passive)
- (c) Ambulance facility in house, if not available then should be available on urgent call basis.
- (d) Rescue facilities and personal protective equipment (PPEs)
- (e) First aid facilities.
- (f) Medical facility in house or tie up with nearby hospital/health centre
- (g) Internal and External Communication facilities along with alerting system
- (h) Assembly points
- (i) Escape route and evacuation zones

II) Internal and External Emergency contact numbers and addresses of police, SEMAs, fire services, hospitals, mutual aid industry, factory inspectors, Board, State Environmental Protection Agencies (SEPA), etc.

III) Addresses and Telephone Directory of Professional Emergency Responders, Technical Support Services.

### 8. Emergency Recovery Procedure

After the emergency, the following activities need to be carried out in detail.

- a) Information to statutory authorities
- b) Incident investigation.
- c) Damage assessment.
- d) Salvage of products, de-contamination, clean-up and restoration.
- e) A detailed report shall be prepared based on the entire experience of the incident, including restorations, limitations and lessons learnt.

## ANNEX 6 – GBV Action Plan

### OBJECTIVE AND SCOPE

The objective of the GBV Action Plan is to provide activities and guidelines to prevent and mitigate the risks of Gender-Based Violence, specifically SEA/SH in RAAMP and respond effectively and efficiently to any incidents that may occur. This plan will also extend to the RAAMP-SU implementation, and may be updated as required. The GBV Action Plan specifies GBV risks associated with labour influx and the mitigation measures for such GBV risks, including mapping of service providers, stakeholder's engagement and defining a response mechanism for SEA/SH incidences. While implementing the GBV Action Plan, the key guiding principles to be followed by RAAMP-SU will include:

- **SURVIVOR CENTRED APPROACH** – Under the RAAMP-SU, the Survivor Centred Approach shall be aimed at creating a supportive environment in which a survivor's rights and wishes are respected and in which s/he is treated with dignity and respect. The approach will help to promote a survivor's recovery and his/her ability to identify and express needs and wishes, as well as to reinforce his/her capacity to make decision about possible interventions.
- **CONFIDENTIALITY** – Measures have been established to ensure that only necessary information as requested and agreed by the survivor is shared.
- **RESPECT** – The RAAMP-SU GBV Action Plan recognizes that showing respect to a GBV survivor will aid the restoration of dignity, re-establish a sense of control and trust as well as understanding and managing reactions and trauma.
- **SAFETY** – The emotional and physical safety of survivors is key. Therefore, every form of assistance or action to a survivor under RAAMP-SU must ensure emotional and physical safety.
- **NON-DISCRIMINATION** - Survivors should receive equal and fair treatment regardless of their age, gender, race, religion, nationality, ethnicity, sexual orientation or any other characteristic and survivors should receive access to services regardless of the alleged identity of the incident perpetrator.
- **CONSENT FORM** - Consent forms must be issued to all survivors of GBV to fill before linking them to any services, the forms will equally be signed by various groups before carrying out any GBV focused-group-discussions (FGD) or interviews.

### SEA/SH RISKS IN THE PROJECT

The RAAMP-SU is a project planned to rehabilitate several rural roads nationwide. With this in mind, a large amount of work force will be required to undertake civil works sub-projects/intervention works in the prospective states. Therefore, the over-aching condition which will increase the risk of SEA/SH under RAAMP-SU implementation is Labour Influx. Importantly, Labour Influx leads to rapid migration and settlement of workers in a project area. Typically, in circumstances where labour/skills and goods and services required for a project are not available locally, increased disposable income can increase incidence of sexual exploitation and abuse and sexual harassment.

### MITIGATION MEASURES

In order to minimize the SEA/SH risks, the following mitigation measures will be put in place within the scope of RAAMP-SU:



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Mitigation Measure	Responsibility	Timeline	Parameter to be Measured	Performance Indicator	Cost
FPMU/SPIU to have GBV Specialist and TA's	Procurement Officers at the FPMU and SPIUs	After disclosure of the ESMF	Procurement announcements	Compliance with mandate of procurement of GBV specialists/TAs	TBD
SPIUs to have GBV Specialist in the supervision consultants' contract as key staff.	SPIU Procurement Officer with advisory from the SPIU safeguards team.	During preparation of contracts for Supervisory Consultants	Supervisory Consultant's (SCs) contract document	Compliance to inclusion of GBV specialist in SC's contract.	TBD
ESMF and ESMP to have GBV mitigation and labour influx management plans.	FPMU/SPIUs	ESMF – Prior to RAAMP-SU nationwide implementation  ESMP – Prior to implementation of intervention works for states.	Draft E&S Instruments (ESMF & ESMPs)		TBD
C-ESMPs to reflect GBV risk and mitigation actions.	Contractors	Prior to implementation of intervention works	Draft CESMPs	No of Contractor Personnel trained on GBV risk and requirement on Code of Conduct (CoC)	TBD
GBV-specific GRM process to be developed and operationalized	FPMU	Prior to RAAMP-SU project implementation nationwide	Draft GBV Action Plan Draft RAAMP-SU GRM	Existence of a standard referral pathway for GBV survivors that is accessible, confidential and responsive.	TBD
SPIU to clearly define GBV requirement and expectation in bidding documents	SPIU Procurement Officer with advisory from the SPIU safeguards team.	During preparation of contracts for engagement of contractors or consultancy services.	Contract and bidding document	Compliance to inclusion of GBV clauses in bidding document	TBD
Mapping out of service providers for GBV response	SPIUs	Prior to implementation of intervention works	No of GBV service providers mapped across the project areas per state.	Efficiency of referral pathway for survivors and ease of accessibility to service.	TBD
Engage an intermediary service provider (as stated in model2)	FPMU and WB	Prior to implementation of intervention works	Level of handling of allegations arising from the project	No of SEA/SH allegation sorted, processed and monitored.  No of GBV sensitization and awareness conducted.	TBD
GBV SEA/SH sensitization will be provided for all RAAMP project staffs, consultants, contractors and workers.	TA GBV and GBV Officers in the SPIU and FPMU	Prior and during project implementation.	GBV sensitization manuals, infographics, flyers; attendance sheets from sensitization.	No of awareness and sensitization program held  No of communities engaged, etc.	TBD
All project workers will understand and sign the Code of Conduct (CoCs)	SPIUs/Contractors	Prior to commencement of intervention works	Signed CoCs	Compliance to signing of CoCs  No of CoC's signed  No of trainings on SEA/SH for contractor workers	TBD

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Mitigation Measure	Responsibility	Timeline	Parameter to be Measured	Performance Indicator	Cost
Awareness raising activities will be conducted in all the project implementation communities.	SPIU	Prior and during project implementation.	GBV sensitization manuals, infographics, flyers; attendance sheets from sensitization.	No of awareness and sensitization program held  No of communities engaged, etc.	TBD
Capacity building workshop on SEA/SH will be provided to all project workers.	SPIU/SCs GBV Specialist	Prior and during sub-project implementation.	Training Reports, Pictures, Attendance sheets from capacity building.	No of trainings on SEA/SH for contractor workers	TBD
An easy access and functional GRM and a referral pathway will be operationalized in order to collate complaints related to SEA/SH and refer survivors.	SPIUs	Prior to project implementation at the RAAMP-SU	Draft GBV Action Plan Draft RAAMP-SU GRM	Existence of a standard referral pathway for GBV survivors that is accessible, confidential and responsive.	TBD
Introduce activities and programs to improve women inclusion and participation in the project.	FPMU and SPIUs	During project implementation	Level of women participation in community-level programs	No. of women with improved livelihoods due to community programs  Ratio of Women to Men benefitting from project initiatives  No of women with new technical skills as a result of initiatives introduced.	TBD
Engagement of Third-Party Organization	SPIUs	During project implementation	Monitoring reports	Frequency of reporting and provision of feedback to SPIUs and implementing MDAs	TBD

**Costs will be determined in detail by SPIUs during project implementation.**

### Accountability and Response (A & R) Framework for RAAMP-SU

The Accountability and Response Framework outlines the procedures for handling incidents, should they occur, including investigation protocols, timelines, and potential disciplinary actions for breaches of the Code of Conduct by workers. Contractors are contractually obligated to ensure that workers adhere to the Code of Conduct and implement disciplinary measures. The Draft Accountability and Response Framework, which includes an SEA/SH Action Plan, will be finalized in collaboration with the contractor and incorporated into the Contractors-Environmental and Social Management Plan (C-ESMP). This framework also includes procedures for internally reporting SEA/SH allegations to ensure accountability, a referral pathway for directing survivors to appropriate support services, and guidelines for maintaining confidentiality when handling cases. The Table below. Shows the accountability and response framework for RAAMP-SU.

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### Accountability and Response Framework for RAAMP-SU

Function	GRC	Intermediary service provider	Other GBV Service Providers	Works Contractor	Supervising Engineer	PIU Staff	SEA/SH Committee	Third Party Monitor
Receive grievances	✓	✓						
Document and register grievances	✓	✓						
Inform survivors about legal and internal data-sharing obligations	✓	✓						
Notify GM operators World Bank in accordance with the required reporting protocols						✓		✓
Refer survivors to relevant GBV service providers	✓	✓						
Provide support services to survivors	✓	✓	✓					
Review grievances and determine the likelihood that they are project-related							✓	
Recommend sanctions for perpetrator in accordance with employment contract and local law and follow up on the recommendations				✓	✓	✓		
Report action taken to project-level GRM so that the case can be closed	✓	✓						
Monitor, track, and provide regular reports to the implementing agency	✓	✓					✓	✓
Respond to survivors	✓	✓	✓					

### GBV SPECIFIC GRM ARRANGEMENTS

The RAAMP-SU Project SEA/SH allegations will be addressed differently from other project related grievances because of the sensitivity of GBV cases and how they directly affect an individual's wellbeing and safety. RAAMP-SU will adopt model #2 of the GRM document which links project grievance mechanism to an identify intermediary service provider to handle SEA/SH allegations. The intermediary service provider will be open to the use of all members of the communities as well as stakeholders. SEA/SH allegation can be reported through project-level GM Channels or through the complaint boxes or toll-free phone calls, writing, emails or directly to the intermediary service provider. Operators of the project level GM Channel would be trained to refer all SEA/SH allegation to the designated intermediary. If SEA/SH allegation is received through the formal grievance mechanism which is the intermediary, the intermediary will provide immediate support services in its sphere of competency with the informed consent of the survivor, such as health or psychosocial support or any intervention they can support then refer survivors to other relevant GBV service providers and coordinate with the Project SPIU GBV officer on survivor's behalf with the informed consent of the survivor. The intermediary service provider will equally provide survivors with information regarding the options for reporting and response, including referral to other existing service providers. It is for survivors to decide if they want to report through the grievance mechanism or if they just want to access services, or both. If a survivor wants to access services but does not want to file a formal

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grievance, that decision should be accepted. Survivors should give their consent for each of these steps, according to established response protocol.

RAAMP-SU will ensure women and girls participation at all levels of the project, so as to reduce women vulnerability to violence and as a way of granting equal access to both women and men. This will also help in revealing and preference for GRM Channels which they trust or feel comfortable to use and bring the added value of community members taking ownership of the project therefore reducing the occurrence of SEA/SH in the project.

The SEA/SH Grievance Mechanism i.e the intermediary, will put in place channels for registering, recording, and handling such cases in a safe and confidential manner. In addressing SEA/SH risks, RAAMP-SU will use the four key guiding principles (confidentiality, non-discrimination, survivor safety and security) and the survivor-centered approach using informed consent to systematically and adequately respond to the specific nature of SEA/SH cases.

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# ANNEX 7 – Sample Grievance Redress Mechanism for Sub-Projects Requiring E&S Assessment

## Introduction

This Annex has been prepared in reference to the Beneficiary Feedback (BF) and Grievance Redress Mechanism (GRM) prepared to serve as a blueprint for RAAMP-SU Prospective States and the FCT. The project's BF and GRM to be incorporated to existing arrangements, operationalized at each State and the FCT; and will have two objectives; i) serve as beneficiary feedback platform on the overall performance of the project in the prospective states and the FCT and, ii) serve as a dispute resolution mechanism on pertinent E&S issues. In addition, the grievance mechanism will serve as a tool for receiving allegations of SEA/SH caused by the Project in a survivor centric approach.

Consequently, The GRM for the proposed sub-projects/intervention works will adopt the provisions in the existing BF and GRM and will be applied at 3 levels namely; **Community Level, SPIU Level, State Citizens Mediation Centre (SCMC) and FPMU Level**. The structure and composition of these levels have been further discussed in subsequent sections. The GRM will assist the SPIUs to ensure that deliberate processes and procedures are put in place to capture, assess and respond to concerns from project beneficiaries, project executors and the general public during the implementation of the project. This will ensure smooth implementation of the sub-projects/intervention works, timely and effectiveness in addressing problems that may be encountered during implementation. Adherently, the grievance procedures as contained in the BF and GRM, will be made available to affected persons throughout the implementation period of the sub-projects/intervention works.

## Potential Grievances Related to RAAMP-SU and the Proposed Sub-Projects/ Intervention Works

Under the general RAAMP-SU project, and specifically as applies to the proposed wsub-projects/intervention works; the potential areas that grievances may arise from as a result of activities or inactivity include:

- Delay in execution of project leading to breakdown of trust
- Failure to generate opportunities for employment of locals in the communities
- Disruption to amenities, utilities, farms and socio-economic activities
- Inappropriate/Inadequate or inequitable consultant or behaviour
- Violation of human rights
- Blockage of access routes and consequent traffic congestion on adjoining roads
- Noise/ disturbance
- Fugitive dust from movement of vehicles along earth roads
- Accidents or injuries
- Soil and water contamination due to sediment run-off
- Sexual Exploitation and Abuse/Sexual Harassment of locals as a result of *labour* influx
- Land related matters, including trespass during sub-projects/intervention works
- Exclusion claims
- Physical and/or economic displacements caused by land acquisition or any other project activities
- Under Estimation of Compensation
- Delay in Compensation

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- Property Disputes Among PAPs
- Discrimination of Vulnerable Persons
- Obstruction of right of way Non-inclusion of community members in paid labour/workforce
- SEA/SH of locals as a result of labour influx

### Objectives of the GRM

The specific objectives of this GRM are as follows;

- a. Establish a prompt, easy to understand, culturally appropriate, consistent, acceptable and respectful mechanism to support the receiving, investigating and responding to complaints or grievances from community stakeholders.
- b. Ensure proper documentation of complaints or grievances and any corrective actions taken; and
- c. Contribute to continuous improvement in performance of the project through the analysis of trends and lessons learned.
- d. Resolve grievances when they occur, and mitigate their consequences, as well as preventing them from escalating;
- e. Achieve resolution of RAAMP-SU activity(s) related grievances and conflicts in a transparent, timely and efficient manner;
- f. Achieve improvement, and restore relationships among people and communities arising disputes or displeasure related to the RAAMP-SU activities;
- g. Provide communication channels for aggrieved persons to express their displeasure and be heard;
- h. Improve stakeholder participation and decision making through dialogues and registration of grievances and conflicts;
- i. Win the trust and confidence of project beneficiaries and stakeholders to create productive relationships between parties; and
- j. Allow communities to express views on negative impacts from the RAAMP-SU sub-projects/intervention works, on Contractors, work quality, malpractice, and so on.

### Grievance Uptake Channels

The following channels will be available for grievance uptake:

- In-person to the Grievance Redress Committee (GRC) focal persons
- During meetings organized by the community GRC (with participation of the aggrieved person and stakeholders)
- Use of complaint box
- Letter addressed to the GRC at the Community and SPIUs levels
- Telephone hotlines
- Toll-Free lines
- SMS (regular or short code SMS)
- Dedicated Mobile Applications
- Any other suitable channels to be recommended in future based on further citizens engagement activities.

### Key Steps and Processes for Handling Complaints through the GRM

In line with the BF and GRM, when a grievance is received and registered, necessary steps will be taken to resolve the issues namely: (See Figure 23)



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- a) Receipt and Registration of Grievance
- b) Feedback
- c) Verification, Screening and Sorting of Grievances

**Screening:** The investigation will determine, among other things, whether the matter has any links with the RAAMP-SU or whether the level at which it is presented can handle it. **In the case of SEA/SH complaint, the complaint will not be investigated but rather referred to the SPIUs for onward referral to the appropriate authority or service provider. If a complaint or feedback is found not to be linked to RAAMP-SU, the complainant or feedback provider should be informed of the decision to reject such a complaint; which must be done within 2 days of registration of the complaint or feedback.**

Other reasons why a complaint or feedback may be deemed not eligible and rejected shall include, but not limited - criminal issues relating to armed robbery, serious bodily harm, manslaughter or murder.

**Sorting:** Different types of grievances or complaints need different responses or ways to respond to them. Therefore, the grievance must be categorized to facilitate action appropriate to the type of grievance. Seven categories of complaints are proposed for the RAAMP-SU. These are;

- Resettlement and Compensation Issues
- Labour & Employment related issues
- Exclusion Claims
- Environmental Management Issues
- Health & Safety Concerns
- Project Management Issues e.g., project timelines, scope of works
- Others.

- d) Investigation and Consideration of grievances
- e) Implementation and Case Closing

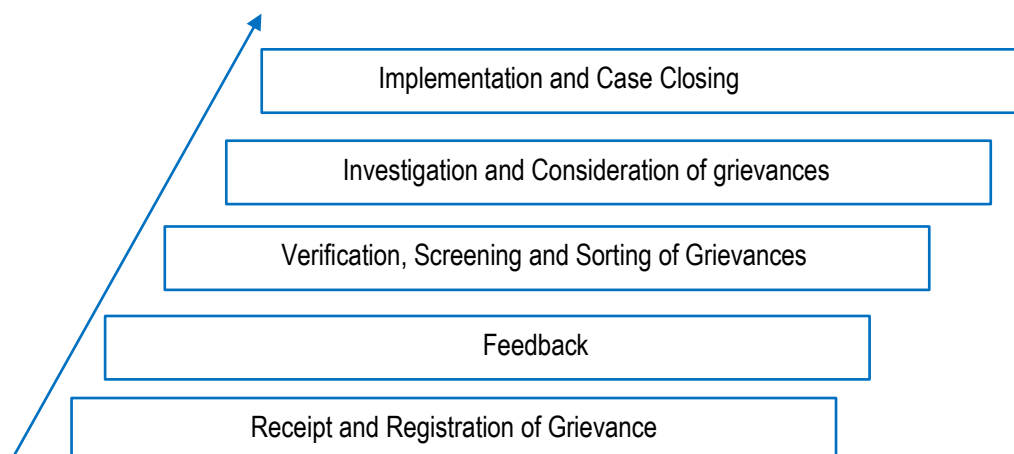


Figure 19: Schematic illustration of steps in grievance uptake

### Structure of Grievance Redress for RAAMP-SU

A three-level redress system in the form of Grievance Redress Committee (GRC) is planned to address all complaints during the implementation of RAAMP-SU sub-projects/intervention works. These include:

- Community level -
- SPIU level

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- State Citizens Mediation Centre (SCMC)
- FPMU Level

### **First Level of Redress: Community – Based GRC**

Considering that the traditional leaders are often engaged with diverse matters affecting their communities, and as such may not be readily available to participate directly in the day to day running of the RAAMP-SU GRM, a traditional ruler/leader shall be required to nominate a chief or palace elder to act in their place in the community-based GRC. Members of each proximate community shall be mobilized to nominate not more than ten persons into a community-based GRC, comprising of representatives of:

- The traditional leader
- Opinion leaders or community influencers
- Women
- Youth
- A Community Grievance Focal Person
- Any minority group(s) within the community e.g., non-indigenous settlers

**Summary of functions:** There shall be a GRC in each proximate cluster of project beneficiary communities along each proposed intervention work or Lot – depending on the distance between communities. The nomination of members of the GRC shall involve a participatory process to take place during a well-publicized town hall or community meeting, led by the traditional leadership and supported by the RAAMP-SU SPIUs. Local interest groups like NGOs/CSOs, respected citizens in the project communities and reputable community associations shall also participate in the selection of the GRC members. During the sensitization of the communities on the GRM, a Community Grievance Focal Person, would be selected based on a set of standard criteria.

#### Roles of the Community Grievance Focal Persons

- Be the main support for the RAAMP-SU GRM at community level.
- Receive training from SPIUs on roles and responsibilities.
- Be responsible for the Complaint Box and ensure that Complaint Forms are always available.
- Enter information into the incident intake form
- Promptly call the complaint in to the SPIUs Grievance Focal Person directly in the case of SEA/SH cases as soon as the incident is known.
- Refer SEA/SH survivors to support services available in the community, based on his/her consent, as per the GBV referral pathway detailed below and follow up with GBV cases, all while maintaining confidentiality to protect the survivor and remaining in close contact with the SPIUs.
- Enter the information into the incident intake form while maintaining the reporting protocol.
- Refer the allegation to needed assistance including GBV Service Providers and to the RAAMP-SU SPIUs GBV Consultants.
- Sensitize communities on SEA/SH and GBV services available/referral pathway.
- Ensure proper feedback is provided to complainants

### **Second Level of Redress: SPIU Level –RAAMP-SU SPIUs GRC**

The GRC established within the SPIUs, will receive and redress issues or matters presented to it from the Community-Based GRC. This GRC shall be chaired by the Social Safeguards Specialist of the respective RAAMP-SU Prospective States and the FCT, and comprising of:

- State Project Coordinator (Advisory)
- SPIU Social Safeguard Officer
- SPIU Technical Assistant on Social Safeguards

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- SPIU Environmental Safeguards Specialist
- SPIU Technical Assistant on Environmental Safeguard
- SPIU Technical Assistant on Gender Based Violence (GBV)
- SPIU Communication Specialist
- A representative of the State-level ADR Agency (e.g., Citizens' Rights/Mediation Centre)

Representatives of the project contractors shall also be invited when the need arises. Furthermore, the SPIUs GRC shall be responsible for:

- Coordinating the entire grievance mechanism at the state levels.
- Resolving disputes that are within their power or control.
- Making recommendations for action to the GRC at the FPMU in the case of issues of extreme importance or urgency.
- Offering the interested parties, the option of referral to the Citizens' Rights/Mediation Centre under the respective state Ministry of Justice. This feedback to the complainant shall be done through the relevant community-based GRC in the case of grievances that are either unresolvable at the FPMU level or found at the SPIU levels to be extraneous to the execution of the RAAMP-SU.
- Provide adequate resources to offset operational administrative costs of the community based GRCs.

### **Third Level of Redress: State Citizens Mediation Centre (SCMC)**

Following on the provisions in the general RAAMP-SU BF and GRM, The GRM for the RAAMP-SU Prospective States and the FCT will be integrated into the existing SCMC where existent and shall use existing arrangements and Standard Operating Procedures (If not in existence, this level may not be required). If disputes cannot be resolved by the SCMC GRC, the case will be referred to the FPMU GRC within 5 days.

### **Fourth Level of Redress: RAAMP FPMU GRC**

The FPMU GRC shall be the apex coordinating institution of the GRM. The main roles of the FPMU GRC are to; i) oversee the operations of the GRMs in the various prospective states and the FCT ii) allow affected parties, who are unhappy with how their complaint has been handled by the first, second and third tiers GRCs to apply for a reconsideration of their cases and, iii) E&S feedback or issues that has not been handled by and filed directly to the SSO, Community based GRCs, GRCs, SPIUs and, SCMC.

The FPMU GRM shall consist of the following members:

- A nominee from the office of the National Coordinator, RAAMP-SU
- FPMU Social Safeguard Officer
- FPMU Technical Assistant on Social Safeguard (GRM Coordinator)
- FPMU Technical Assistant on Environmental Safeguard
- FPMU GBV Specialist
- Head of Procurement or a nominee
- Elected representative of the community based GRCs from each of the four states

This committee shall receive monthly reports on status of disputes/complaints from the RAAMP-SU SPIU GRCs and shall provide approvals or guidance on action items in the report. If disputes cannot be resolve by the FPMU GRC, the affected or interested party will be advised to peruse the case in a court.

### **Referral to Law Court**

If the aggrieved person is unsatisfied with the resolution reached upon exhaustion of all available avenues for settlement, he/she would be advised to seek legal redress at the court of law. Referral to a law court should ordinarily be done after a case has been referred to the Citizens' Rights/Mediation Centre and is still without

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resolution, but it should be noted that the complainant reserves the right to choose their own preferred legal method of redress at any point.

### **Awareness of GRM**

GRM should be given a wide publicity among stakeholder groups such as affected parties, government agencies, and civil society organizations. Effective awareness of GRM process makes people better understanding about their options, depending on the types of complaints. However, measures should also be taken to encourage stakeholders not to submit false claims. Criteria for eligibility need to be communicated and also awareness campaigns should be launched to give publicity to the roles and functions of the GRM.

Awareness should include the following components:

- Scope of the sub-project/intervention works, potential positive and negative impacts etc.;
- Types of GRCs available; purposes for which the different GRMs can be accessed, e.g., air and noise pollution related grievances, grievances related to physical and economic displacement,
- Types of grievances not acceptable to the GRC.
- Eligibility to access the GRM.
- How complaints can be reported to those GRC and to whom, e.g., phone, postal and email addresses, as well as information that should be included in a complaint;
- Procedures and time frames for initiating and concluding the grievance redress process; boundaries and limits of GRM in handling grievances; and roles of different agencies such as project implementer (RAAMP-SU and funding agencies).
- A variety of methods can be adopted for communicating information to the relevant stakeholders. These methods could include display of posters in public places such as in government offices, project offices, community centers, hospitals and health clinics of the area.

Similarly, an effective awareness program should be arranged to educate the project stakeholders on the following:

- Members of GRC and its location
- Method of complaining or reporting the grievance
- Taking part in the GRC meeting (is any companions of the complainant allowed)
- The steps of resolving process and timeline adopted in this mechanism.
- Needed documents and evidence to support of the complaint.

### **Addressing SEA/SH/GBV in the GRM**

The GRM is also expected to address forms of GBV<sup>71</sup> such as SEA/SH of PAPs as a result of labour influx. To fulfill the role of addressing GBV, the Project has recruited GBV Technical Assistance Consultants at the FPMU and at the prospective states to support the implementation of the GBV Action Plans<sup>72</sup> including supporting the operationalization of the GRM. The sub-projects/intervention works GRM will adopt the survivor centered approach specifically for handling SEA/SH cases as captured in the RAAMP-SU BF and GRM. In addition, to the survivor centered approach the GBV-GRM shall address right to safety, respect, and confidentiality, of the complaint intake and management. There is need to ensure that GRM procedures and mechanisms for reporting allegations of SEA/SH are known to all GRM Focal Persons.

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<sup>71</sup> The Environmental and Social Incident Reporting Tool (ESIRT) provides for a classification of incidents of cases reported as indicative, serious or severe. All types of GBV cases are categorized as severe.

<sup>72</sup> A GBV Assessment was conducted for the RAAMP-SU during Project preparation. Consequently, a GBV Action Plan was developed, which itemizes specific measures the Project must follow during implementation.

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### Specific Principles Applicable to GRMs for Sexual Exploitation and Abuse

Confidentiality and anonymity. The GRM should:

- Have multiple channels through which complaints can be registered.
- Grievance Uptake Channels (GUCs) must be designed to allow complainants submit grievances in a confidential and anonymous way
- Unauthorized persons MUST not have access to complaints
- Personal details of complaints must not be disclosed if complainants wish to remain anonymous
- Allow safe and confidential reporting: survivors should be able to report SEA/SH without being identified publicly.
- Protect information about SEA/SH allegation, and in particular the identity of the survivor and those involved, at all times.
- Log SEA/SH cases separately from other cases and should not include identifiable information in a logbook. A separate coding system for names should be created and stored in a locked cabinet. The complaint logbook should also be stored in a different locked cabinet.

### Survivor-centricity and safety

The GRM should:

- Support the creation of a supportive, dignified and protective environment for the SEA/SH survivor, and full respect of his/her rights, wishes and choices.
- Be based on the survivor's informed consent, which needs to be guaranteed throughout the GM. Maintain confidentiality and anonymity as a fundamental way to guarantee survivors' safety: survivor files should not be discussed with anyone.
- Provide feedback on the case to the survivor only and exercise strong caution before communicating any results beyond the survivor.

### GRM Jurisdiction

This is a project specific GRM and applicable to solve the concerns of the stakeholders of the Project. This is however not intended to bypass Governments own redress process; rather intended to address affected people's concerns and complaints promptly, making it readily accessible to all segments of the affected people and is scaled to the risks and impacts of the Project. The Government Redress mechanism takes priority over this one.

The Figure 20 below shows the flow chart for the Grievance Redress Mechanism (GRM)

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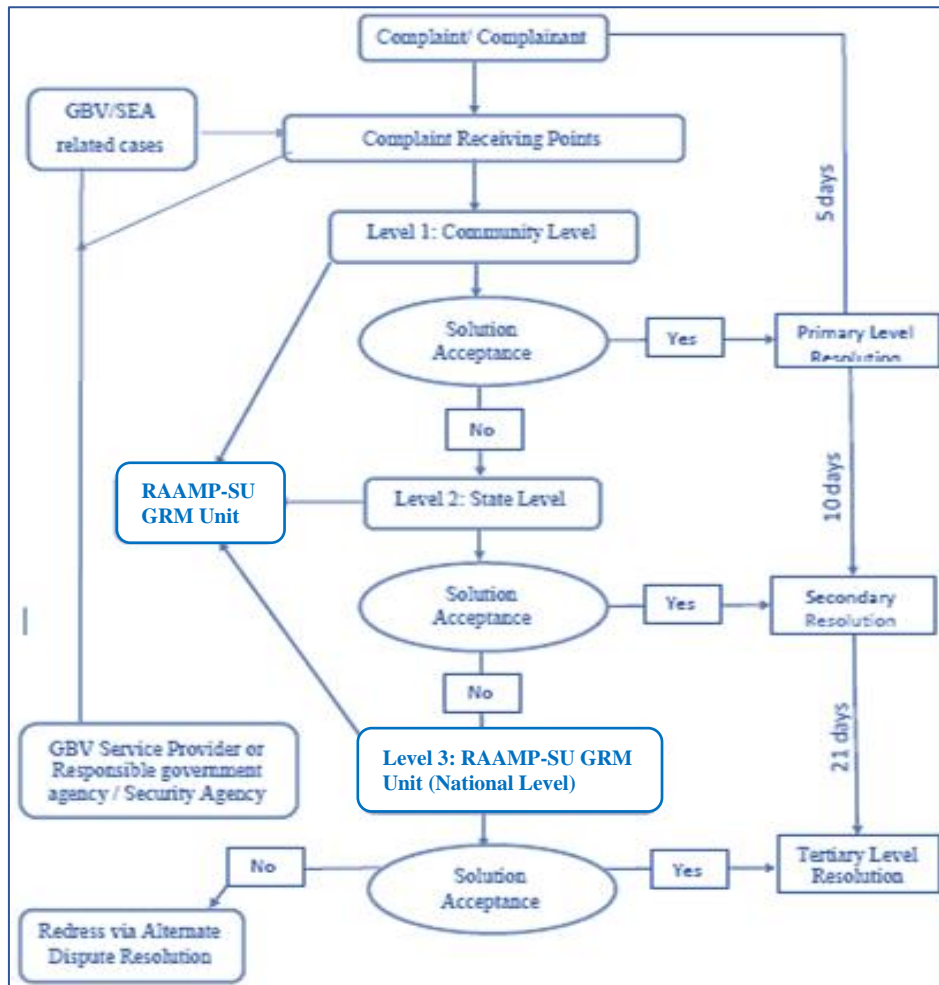


Figure 20: Flowchart RAAMP-SU GRM



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# ANNEX 8 – Terms of Reference (ToR) of the ESMP Study & Structure of the ESMP Report

## RURAL ACCESS & AGRICULTURAL MARKETING PROJECT – SCALE UP (RAAMP-SU) CONSULTANCY SERVICES FOR THE ENGAGEMENT OF A CONSULTANCY FIRM FOR THE PREPARATION OF ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP) FOR ROADS REHABILITATION

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### Background and Context

The Federal Government of Nigeria (FGN) has requested the World Bank (WB) to increase the number of states participating in the current Nigeria Rural Access and Agricultural Marketing Project (RAAMP). Presently, there are 19 pioneer participating states under RAAMP, however the next phase of the RAAMP program, which will be the Rural Access and Agricultural Marketing Project – Scale Up (RAAMP-SU) will be open to all states in Nigeria (36 states including the Federal Capital Territory (FCT)). The project will be guided by the Government's Rural Travel and Transport Program (RTTP). The lead implementing agency is the Federal Department of Rural Development (FDRD) of the Federal Ministry of Agriculture and Food Security (FMAFS). The Federal Project Management Unit (FPMU) which is currently overseeing RAAMP will direct and coordinate the affairs of the RAAMP-SU on behalf of FDRD, while the state governments of the respective participating states will implement the RAAMP-SU through State Project Implementation Units (SPIUs). The Project Development Objective (PDO) of RAAMP-SU is to improve rural access while strengthening the financing and institutional framework for a sustainable rural road network in participating States. The RAAMP Scale-Up will focus on connecting rural communities to local agricultural markets such as roadside agro-logistics hubs, social amenities such as schools and hospitals, introduce innovative approach of Green Roads for Water into the project design to enhance the resilience of the project as well as promote social cohesion at rural level.

1. The Nigeria road network is relatively dense consisting of about 194,000 km of roads. This includes 34,000 km of federal roads, 30,000 km of state roads and 130,000 km of registered rural roads. The road density is about 0.21 km of roads per square kilometre. In spite of the relatively high road density, the rural accessibility index for Nigeria (defined as the proportion of the rural population living within 2 kilometres away from an all-weather road) is low, at only 25.5 percent, leaving about 92 million rural dwellers unconnected [RAAMP Project Appraisal Document, 2019]. Rural access is limited where the poor population is concentrated. These considerations demand the expansion and improvement of rural road network, and, also, conservation of rural road/transport assets.
2. The RAAMP-SU has been designed to have four (4) components; these are summarized below.

**Component A: Improvement of Resilient Rural Access:** The aim of this component is to ensure year-round rural access to socio-economic services, agriculture markets and job opportunities through the rehabilitation/upgrading of selected rural roads and their resilience to climate change impacts in participating states.

The component comprises three subcomponents:

**Subcomponent A.1: Climate-informed Rural roads rehabilitation/upgrade:** About 3000 km of rural roads to and from socio-economic community infrastructure will be rehabilitated or upgraded by the project as to enhance the resilience of the rural road network to climate change impacts and ensure year-round connectivity. The rural roads will be selected for rehabilitation or upgrading considering climate change related hazard levels, exposure and vulnerability of the rural roads, ancillary assets and of socio-economic benefits to communities served. The rehabilitation works will include climate resilience and flood protection measures, such as, repairing, and strengthening of bridges and culverts, slope stabilization, erosion protection improvements, road surface repairs or resurfacing and other engineering solutions. As much as possible, the project will adopt technical

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consideration facilitating the flow of water from surface and drainage of the main and upstream to rapidly capture flood waters and recycle them into agriculture activities. The project will also explore techniques from the Green Roads for Water approach and any additional physical measures, as needed. The envisaged civil works will also focus on local resource-based solutions/materials that are compatible with the local context/conditions.

**Subcomponent A.2: Technical support for Rural Roads rehabilitation/upgrade** required for the successful implementation of subcomponent A.1. including: (a) technical design (including consulting services for incorporating nature-based solutions and “Green Roads for water” approach), environmental and social safeguards instruments, and bidding document for project related activities; (b) monitoring and supervision of the implementation of the civil works, including the Occupational Health and Safety plan (OHS) and Road Safety Management during works as well as the resettlement action plan (RAP).

- **Subcomponent A.3: Social inclusion and promotion of gender equality** will be fully integrated as part of the project through: (a) the scale up of the Maternal New-born and Child Emergency Transport Services (MANCETS) initiatives in participating states. Converted three-wheelers into mini ambulances, will be handed to health facilities identified along the roads to be rehabilitated and will contribute to reduction of rural maternal mortality and facilitate access of giving birth mothers to Primary Health Care PHCs centers. The National Emergency Medical Service and Ambulance System (NEMSAS) will support the project in the implementation and monitoring of this activity. (b) The establishment of an apprenticeship program within the RARAs to train young men and women engineers, with a particular focus on gender inclusion. As part of the program, a stipend will be provided to participants complemented by a mandatory rotation within several departments of the institution and mentorship by senior engineers. A non-bidding MOU between the RARAs, several engineering universities and contractors will be signed to facilitate the school to work transition

**Component B: Climate Resilient Asset Management:** The aim of this component is to carry out climate informed maintenance activities to enhance the resilience of the rural road network, building on sector and institutional reforms established by the parent project, and the enhancement and of established climate resilient road asset management systems NiTRIMS in newly established state road authorities (RARAs).

This component comprises of two sub-components:

**(i) Subcomponent B.1: Asset management improvement and Resilience Scale up.** This subcomponent will finance: (a) climate risk informed routine and periodic maintenance of 3500 km of rural roads identified through the Annual Road Maintenance system (ARMP) by the established RARA in participating states; (b) technical design, environmental and social safeguards instruments, and bidding document for project related maintenance activities; (c) monitoring and supervision of the implementation of maintenance works.

**(ii) Subcomponent B.2: Development and implementation of a climate risk informed road asset management system.** This component entails: (a) The revision of road maintenance protocols to integrate climate resilience considerations in rural road maintenance activities (b) The development and integration of a climate risks module in the NiTRIMS system and the compilation and collection of the data required, including the establishment of data collection and compilation protocols, establishment of inter-agency cooperation agreements, and other provisions for continued system updates. (c) The addition of poverty, health, and education data (collected through satellite imagery and other sources of geospatial Big Data) to the NiTRIMS system layered with climate considerations for most climate vulnerable population segments, in road prioritization for rehabilitation and maintenance. (d) Rolling out use of NiTRIMS in all 36 states (building on activities from previous RAAMP phases, and (e) RARAs staff training and strengthening their capacities for adoption of NiTRIMS (with the additional climate and social considerations).

**Component C: Institutional Strengthening and Project Management:**

The component comprises of two sub-components:

**(i) Subcomponent C.1: Project Management** which will support project operating costs, training, project monitoring and impact evaluation activities. It will also cover TA consultancies including support to the Department of Lands under the Ministry of Agriculture and Food Security to address the resettlement activities

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systematically. This sub-component will also support project risk mitigation activities including third party monitoring for sexual exploitation and abuse (SEA), gender, Grievance Mechanism (GM).

**(ii) Subcomponent C.2: Institutional Strengthening and sector reforms.** This entails the provision of technical advisory services and capacity strengthening activities, building on previous state-level sector reforms supported in earlier stages of the RAAMP program, as to ensure the sustainability of these institutions. Specifically, it will aim to cover: (a) Continuation of state-level road sector reforms activities, including identification, evaluation, and implementation of measures to improve institutional and financial sustainability of the newly established entities (RARA & SRF) in participating states. (b) TA to develop a climate risk assessment and management framework for the rural road network to inform transport planning and the selection of priority roads for investment (rehabilitation and upgrading). This component will also entail the development and operationalization of a climate risk management plan for rural roads (and served rural communities) at state level and at federal level, for mapping of possibilities of adoption of the “Green roads for water” approach. This subcomponent will also finance RARAs building capacities to conduct local level climate risk assessments as to inform road civil works related to road rehabilitation, upgrading, construction, and maintenance. Provision of TA and training on the revision of procurement protocols to integrate climate risks and resilience considerations in road construction/rehabilitation/upgrading designs, and incorporation of climate risks and resilience considerations in the rural roads asset management system. Support will also entail the development of national guidelines on climate resilient design standards for rural roads, bridges construction, rehabilitation, upgrading/retrofitting, and maintenance as well as the development of climate resilient technical standards. (c) Rural road safety’s institutional strengthening both on Federal and state level. (d) Support for the operationalization of the national rural road directorate (NDRR) to be mandated under the newly established national Agriculture development Fund (NADF), including operational budget, technical support for governance and institutional management, as well as building capacities related to climate risk management and incorporation of climate considerations in decision making

### Component D: Contingent Emergency Response

**The component will address emergency needs as agreed with the government following an officially declared natural disaster.**

However, this Consultancy will be focused on Component A: Improvement of Rural Access and Trading Infrastructure – activities include rehabilitation of 3000 km of rural roads to and from socio-economic community infrastructure to include climate resilience and flood protection measures, such as repairing, and strengthening of old bridges and culverts, slope stabilization, erosion protection improvements, surface repairs or resurfacing and other engineering solutions.

3. RAAMP-SU has been appraised by the Bank and developed on the basis of the World Bank’s Environmental and Social Framework (ESF). Considering the nature of these works, their scope, geographic coverage and client’s capacity, the following World Bank Environmental and Social Standards are relevant:

- ESS 1: Assessment and Management of Environmental and Social Risks and Impacts
- ESS 2: Labour and Working Conditions
- ESS 3: Resource Efficiency, Pollution Prevention and Management
- ESS 4: Community Health and Safety
- ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- ESS 6: Biodiversity Conservation and Sustainable Management of Natural Living Resources
- ESS 8: Cultural Heritage
- ESS 10: Stakeholder Engagement and Information Disclosure

The overall environmental and social risks of the project are Moderate. This is based on an initial environmental and social assessment of project activities. It is expected that the very limited adverse E&S risks and impacts are likely during project implementation; especially as the project does not contemplate constructing new roads and will essentially remain within the existing right-of-way.

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### Goal of the Assignment

7. The goal of the assignment is to identify the potential social and environmental risks and impact by conducting adequate environmental and social assessments and preparing site-specific instruments for managing the negative impacts associated with the Backlog Maintenance, Spot Improvement, Cross Drainages, and Upgrade work packages.

### Brief Description of The Project Area

8. *SPIUs to include a brief description of the project environment.*

### Description of Proposed Road Rehabilitation

The work package would involve engineering works such as, but not limited to, the following:

### Spot Improvement, Backlog Maintenance/Rehabilitation and Upgrade Works Packages

- Site clearance
- Earthworks (i.e. removal of unsuitable material and filling of lateritic material)
- Re-sealing / overlay of cracks and eroded carriageway sections
- Potholes patching
- Pavement works (i.e. construction of sub-base and base courses, priming, and thin asphaltting).
- Improvement / provision of culverts/ drains /slopes/embankments/other structures.
- Complete or slight resurfacing
- Widening of shoulders of the existing road.
- Miscellaneous works (i.e. provision of road markings, signs and other infrastructure).

10. These activities have the potential to generate environmental and social impacts including noise and dust generation; delay in travel time due to traffic obstruction, accident risks to road users, potential pollution to water resources from poor waste management, community health & safety risks such as accidents/spread of STDs, risks of GBV/SEA/SH, traffic congestion, security risks to workers such as kidnapping and banditry amongst others.

11. In line with the RAAMP-SU ESMF, an Environmental and Social Screening was conducted in XXX for the various interventions to ascertain the eligibility of the roads based on the environmental and social sensitivities, and the need for preparation of any site-specific instrument or otherwise. The screening identified the need to prepare an Environmental and Social Management Plan (ESMP) to adequately address the site-specific E&S risks and impacts envisaged due to the project activities for the XX roads.

12. Against this backdrop, the client desires to engage the services of a consultancy firm to prepare an Environmental and Social Management Plan (ESMP) for the Work Packages.

### Objectives and Scope of the Consultancy Firm

13. The objective of the consulting services is to prepare an Environmental and Social Management Plan (ESMP) for the XX roads (totaling XX km) proposed for phase 1 under XXXX State RAAMP-SU in line with the guidelines of the World Bank/IDA and the Nigeria EIA Act. In consistence with ESS 1, the ESMP shall eliminate adverse environmental and social risks and impacts, offset them, or reduce them to acceptable levels. The ESMP will also include the measures needed to implement these actions, addressing the adequacy of the monitoring and institutional arrangements for the upper and lower watersheds in the intervention sites.

### Objectives of the ESMP

14. The specific objective of the ESMP will be to assess the potential environmental and social risks and impacts of the proposed works as described in the detailed preliminary designs and prepare a detailed Environmental and Social Management Plan (ESMP) and develop appropriate mitigation measures to address the negative impacts. The ESMP will also outline mitigation costs & responsibilities, and a monitoring plan which will include monitoring parameters, frequency, responsibility and costs. The ESMP will advise any required updates to the engineering design based on impacts reduction strategies and mitigation measures, prior to finalization of the engineering design.

### Scope of Works

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15. The assignment is for the preparation of site specific ESMP for the Backlog maintenance, Spot Improvement, Upgrade and Cross Drainage in consistence with the requirements of ESS 1 and the ESSs. The ESMP should consist of a well-documented set of mitigation measures, monitoring, and institutional actions to be taken before and during implementation to eliminate adverse environmental and social risks and impacts, offset them, or reduce them to acceptable levels. It should also include the measures required to implement these actions, costing, and responsibility, addressing the adequacy of the monitoring and institutional arrangements in the intervention site.

16. The consultancy firm will work in close collaboration with the engineering design consultants and Akwa Ibom State RAAMP State Project Implementation Unit's (SPIU) safeguard team, and with other actors as directed by the SPIU. In that respect the sequencing of the technical/feasibility studies and the ESMP will be critical. The consultancy firm will have to consider the technical variants of the proposed activities and also in return inform the technical design consultants of any major constraint that may arise due to the social and environmental situation on ground.

The specific task for the consultancy firm shall include but not limited to the following:

- a) Review the existing PAD, ESMF and RPF prepared for the project;
- b) Review of the Project's PIM and Road Intervention Catalogue;
- c) Review of the WB Environmental and Social Standards relevant to the project;
- d) Review of preliminary engineering designs and technical /feasibility studies for the proposed project locations;
- e) Describe the proposed project by providing a description of the project relevant components and presenting schematic diagrams, maps, figures and tables.
- f) As appropriate in highly sensitive sites, describe and analyse the physical, biological and human environment conditions in the study area before project implementation. This analysis shall include the interrelations between environmental and social components and the importance that the society and local populations attach to these components, in order to identify the environmental and social components of high value or presenting a particular interest.
  - The following biophysical issues shall be taken into consideration; Climate, Air Quality, erosion/flooding patterns, drainage pattern, water quality (surface and aquifer characteristics), Soil, biological aspects: flora and fauna, endemic and endangered species.
- g) Identify the policy, legal and administrative framework relevant to the sub-projects.
- h) Define and justify the project study area for the assessment of environmental and social impacts.
- i) Assess the potential environmental and social risks and impacts related to project activities;
- j) Define appropriate mitigation/enhancement measures to prevent, minimise, mitigate, or compensate for adverse impacts or to enhance the project environmental and social benefits, including responsibilities and associated costs.
- k) Review institutional assessment and framework for environmental and social management.
- l) Identify responsibilities and actors for the implementation of proposed mitigation measures
- m) Assess the capacity available to implement the proposed mitigation measures and identify institutional responsibilities and needs for capacity building, if necessary, to implement the recommendations of the environmental and social assessment and associated costs
- n) The following socio-economic issues shall be addressed in the ESMP:
  - Using a mixed methods approach, the study shall establish the social baseline information before project intervention. Social baseline parameters to be determined for each of the spot improvement, Upgrade, Backlog Maintenance and Upgrade sites include;
    - Location
    - Community Organization and Governance
    - Pattern of social networks and interaction in the project area;
    - Access/Transport preferences of residents of project communities



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- population characteristics (number, demographic, literacy levels, other social characteristics, household characteristics, distribution of vulnerability within population around the project sites);
  - economy (prevalent occupations, employment rate, income distribution);
  - Availability of social services (health, education)
  - public services (types, capacity, and adequacy)
  - housing type;
  - Absorptive capacity of local communities for project-induced labour influx (worker/family).
  - Pattern of conflict and conflict resolution mechanisms in project communities
  - Factors driving Gender-Based Violence and Sexual Exploitation & Abuse risk in project areas
- A summary of the views of the population including vulnerable groups, determined through documented discussions with local communities.
  - Cultural: Summarize the possible effects of the project on historical/archaeological sites, heritage/artefacts, native religious or harvest sites of the affected communities and identification or development of mechanisms for handling chance findings.
- o) Carry out consultations with primary and secondary stakeholders in order to obtain their views about the project in consistence with ESS 10. These consultations shall occur during the preparation of the ESMP to identify key environmental and social issues and impacts, and after completion of the draft ESMP to obtain comments from stakeholders on the proposed mitigation/enhancement measures
- p) The consultancy firm shall also document how to manage risk related to Gender Based Violence (GBV) including Sexual Exploitation and Abuse and sexual harassment taken cognisance of (i) Develop a Labour Influx, (ii) Security issues, (iii) project GBV accountability and response framework. In doing these, the consultancy firm shall develop a labour influx, SEA/SH and Occupational Health and Safety Response Plan
- q) Develop a Grievance Redress Mechanism (GRM) which will be applied on the project. A GBV-specific Grievance Mechanism will also be developed to address complaints related to forms of GBV on the project.
- r) For ESMPs to capture the socio-economic, cultural and risk context for women, they should consider:
- Existing gender-specific statistics
  - Data and/or information on cultural and socio-economic practices for women
  - Information obtained from consultations carried out in the preparation of the project.
- s) Prepare an Environmental and Social Management Plan (ESMP). The ESMP should identify:
- The potential environmental and social impacts resulting from project activities
  - The proposed mitigation measures
  - The monitoring indicators
  - The institutional responsibilities for monitoring and implementation of mitigation measures
  - The costs of mitigation, monitoring activities and implementing the ESMP; and
  - A calendar for implementation.

17. In executing the above task, the consultancy firm shall carry out consultations with primary and secondary stakeholders in order to obtain their views about the project. These consultations shall occur during the preparation of the ESMP to identify key environmental and social issues and impacts, and after completion of the draft ESMP to obtain comments from stakeholders on the proposed mitigation/enhancement measures.

18. The following socio-economic issues shall be addressed in the ESMP:

- A summary of the impacted communities for the project: location, access, population (number, demographic and social characteristics); economy (employment rate, income distribution); services



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(types, capacity, and adequacy) and housing. The concern is the ability to provide workforce, service new development and absorb and adjust to growth (worker/family).

- A summary of the views of the population including vulnerable groups, determined through thoroughly documented discussions with local communities. These meetings and discussions must be documented and should show how issues and problems raised are or will be resolved (note that a Resettlement Action Plan (RAP) could be developed for the Site, and this is covered under separate TORs).
- Cultural: Summarize the possible effects of the project on historical/archaeological sites, heritage/artefacts, native religious or harvest sites of the affected communities and identification or development of mechanisms for handling chance findings.

Information will be gathered from field surveys and secondary data sources (interviews, structured questionnaires, in-depth interviews and focus group discussions).

19. The typical contents of an ESMP Report are presented hereafter in section XVI below. It shall be noted that the presentation of the Report may be adapted pending on the nature and specific requirements of the project.

### Ethical Requirements

20. Before undertaking any activity, the team will make sure that it understands all ethical considerations related to working GBV (in particular Sexual Exploitation and Abuse). The consultancy firm should not collect any primary data, they should NOT conduct interviews or research using the SEA survivors and will only make use of secondary sources and data. This is with the objective to minimize harm to women and children.<sup>73</sup>

### Qualification of Consultancy Firm

- The ESMP will be prepared by an Environmental and Social Management Consultancy Firm
- The consultancy firm must have a working knowledge of World Bank Environmental and Social Framework, Operational safeguards policies gained through hands-on experience in the preparation and implementation of environmental and social management plans in an urban/rural area.
- Team Members should have Advanced degree in environmental sciences, natural sciences, environmental management, social sciences and other related discipline
- The lead consultant personnel must have at least a master's degree in environmental sciences, natural sciences, environmental management or similar field
- The firm must have a minimum of 7 years' work experience in civil works contracts requiring Environmental management procedures including mitigation measures
- Proven skill in World Bank (WB) Environmental and Social safeguard policy implementation including addressing cross-cutting issues in development project and must have prepared at least three (3) ESMPs for World Bank funded projects.
- Qualified staff with experience in social safeguards/socioeconomics, occupational Health, SEA/GBV and Safety/HSE and relevant certification
- Excellent communication and report writing skills

### Staffing Requirement

The consulting firm is expected to have the following staff on the team for preparation of the ESMP with the following minimum requirement:

1. **Lead Consultant** (Environmental and Social Management Specialist) - MSc in Environmental Management Fields or similar qualification: At least 10 years' working experience, – 5 years specific experience in the preparation of environmental and social assessment reports (ESIAs/ESMPs/RAP).  
– Participation in similar role in at least three World Bank funded projects in the last 5 years.

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<sup>73</sup> "A woman may suffer physical harm and other forms of violence if a partner finds out that she has been talking to others about her relationship with him. Because many violent partners control the actions of their girlfriends or wives, even the act of speaking to another person without his permission may trigger a beating." For more information on ethical considerations see: VAWG Resource guide, <http://www.vawgresourceguide.org/ethics>

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2. **Environmental Scientist:** Advance degree in environmental sciences or a similar discipline – At least 5 years working experience with specific experience in the preparation of ESIA/ESMP/RAP reports. – Participation in similar role in at three World Bank funded projects in the last 3 years.
3. **Social Expert:** BSc Sociology or related discipline, at least 5 years work experience with specific experience in similar assignment. – Participation in similar role in at least three World Bank funded projects in the last 3 years
4. **Engineer:** Degree in engineering, at least 5 years work experience in with specific experience in civil works/road construction projects. - Participation in similar role in at least three World Bank funded projects in the last 3 years
5. **Mapping/GIS Specialist-** BSc. GIS/Remote Sensing or other related courses, at least 5 years working experience with specific experience in similar assignment – Participation in similar role in at three World Bank funded projects in the last 3 years – Evidence of familiarity with GIS, Arc Info, AutoCAD and other Geo Spatial Design Software.
6. **Stakeholder Consultation Specialist -** Degree in Social Science/Mass Communication or related discipline: At least 5 years working experience with specific experience in similar assignment. – Participation in similar role in at least three World Bank funded projects in the last 3 years
7. **Gender Based Violence (GBV) Specialist:** BSc Sociology or related discipline, at least 5 years work experience with specific experience in similar assignment. – Participation in similar role in at least three World Bank funded projects in the last 3 years

### Deliverables and Timing

- **Inception Report:** An Inception report (3 hard copies and 2 e-copies) detailing the work plan for execution, review of relevant project documents and preliminary impacts identified shall be submitted to the SPIU one (1) week after contract signing.
- **Draft Report:** A draft ESMP report (3 hard copies and 2 e-copies) shall be submitted to the Akwa Ibom RAAMP-SU SPIU for review two (2) weeks from the date of contract signing.
- **Final Report:** A Final ESMP report (3 hard copies and 2 e-copies) considering all comments from the FPMU and World Bank shall be submitted within four (4) weeks for clearance and No-Objection from the World Bank.

### Payment Milestone

- 20% upon submission of Inception Report
- 50% upon submission and acceptance of the Draft ESMP Report
- 30% upon submission of the Final cleared ESMP Report

### Project – Specific Background Document

- a. Environmental and Social Management Framework (ESMF)
- b. Resettlement Policy Framework (RPF)
- c. RAAMP Project Appraisal Document (PAD)
- d. RAAMP Project Implementation Manual (PIM)
- e. Civil work design report

### Duration

The duration of the assignment shall not exceed a period of four (4) Weeks

### Report Outline

LIST OF TABLES  
LIST OF FIGURES  
LIST OF PLATES  
ABBREVIATIONS AND ACRONYMS  
EXECUTIVE SUMMARY

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Environmental and Social Management Framework (ESMF) for the Nigeria Rural Access and Agricultural Marketing Scale-Up Project (RAAMP-SU)

### CHAPTER ONE: INTRODUCTION

- Background
- Description of the proposed intervention
- Scope of the assignment
- Rationale for ESMP
- Objectives of the ESMP

### CHAPTER TWO: POLICY, LEGAL & ADMINISTRATIVE FRAMEWORK

- Discussion of the World Bank Environmental and Social Standards (ESSs) relevant to RAAMP-SU and the proposed activity
- Summary of relevant local and federal policy, legal, regulatory, and administrative frameworks

### CHAPTER THREE: PROJECT DESCRIPTION

- Description of the Proposed Project, Project Component and Activities

### CHAPTER FOUR: DESCRIPTION OF PROJECT ENVIRONMENT

- Description of the area of influence and environmental baseline conditions including climate, air quality, erosion/flooding patterns (Vulnerability assessment), drainage pattern, water quality (surface and aquifer characteristics), soil, biological aspects: flora and fauna, endemic and endangered species.
- Analysis of socio-economic baseline conditions including livelihoods, economic opportunities, income, gender characteristics, age profile, health, transport access, existing community structures - at community, household, and individual levels

### CHAPTER FIVE: IDENTIFICATION AND ASSESSMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

- Methods and techniques used in assessing and analysing the environmental and social risks and impacts of the proposed project
- Discussion of the potentially significant adverse environmental and social risks and impacts of the proposed project
- Discuss the Climate Change Impact and its Mitigation Measures
- Labour influx
- Description of the GBV risk (including a GBV Action Plan), and more broadly the ESHS expectations, and include appropriate mitigation measures. The basis of the GBV Action Plan should be provided as part of the ESMP.<sup>74</sup>

### CHAPTER SIX: GRIEVANCE REDRESS MECHANISM

- Description of grievance redress mechanism (in alignment with the ESMP and Project Implementation Manual) to address situations of conflicts or disagreements about some of the project activities

### CHAPTER SEVEN : ENVIRONMENTAL & SOCIAL MANAGEMENT PLAN<sup>75</sup>

- Discussion of the proposed mitigation measures
- ESMP table
- Institutional responsibilities and accountabilities
- Capacity building plan
- Climate Change Adaptation Plan
- Monitoring and evaluation plan, including suitable indicators for the proposed project

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<sup>74</sup> The GBV Action Plan needs to include specific **arrangements** for the project by which GBV risks will be addressed. This includes considerations such as: a) Awareness Raising Strategy, which describes how workers and local communities will be sensitized to GBV risks, and the worker's responsibilities under the CoC; b) GBV Services Providers to which GBV survivors will be referred, and the services which will be available; and, c) GBV **Allegation Procedures**: How the project will provide information to employees and the community on how to report cases of GBV CoC breaches to the GRM.

<sup>75</sup> The ESMP should take into account that designation of responsibilities between contractor and Borrower may vary on a project-specific basis, in order to improve effectiveness and efficiency in implementation and associated results. To this end, the ESMP should follow the guidance in table 5 in the Labour influx guidance note: <http://pubdocs.worldbank.org/en/497851495202591233/Managing-Risk-of-Adverse-impact-from-project-labor-influx.pdf>

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- Costs of implementing the ESMP

### CHAPTER EIGHT: PUBLIC CONSULTATION

- Public consultation plan
- Presentation of consultations with relevant stakeholders and affected persons

### CHAPTER NINE: CONCLUSION AND RECOMMENDATIONS

### REFERENCES

### APPENDIX 1: TERMS OF REFERENCE FOR THE ESMP

### APPENDIX 2: SOCIO-ECONOMIC DATA COLLECTION INSTRUMENTS

### APPENDIX 3: ATTENDANCE AT COMMUNITY CONSULTATIONS

### APPENDIX 4: GENERAL ENVIRONMENTAL MANAGEMENT CONDITIONS FOR CONSTRUCTION

### CONTRACTS

### APPENDIX 5: WASTE MANAGEMENT PLAN

### APPENDIX 6: OCCUPATIONAL HEALTH AND SAFETY (OHS) PLAN

### APPENDIX 7: BORROW PIT MANAGEMENT PLAN

### APPENDIX 8: SAMPLE OUTLINE FOR CULTURAL HERITAGE MANAGEMENT PLAN & CHANCE FIND

### PROCEDURE FOR THE PROTECTION OF PHYSICAL RESOURCES

### APPENDIX 9: CODE OF CONDUCT FOR GENDER-BASED VIOLENCE

### APPENDIX 10 : CAMPSITE MANAGEMENT PLAN

### APPENDIX 11 : LABOUR INFLUX PLAN

### APPENDIX 12: COMMUNITY AFFAIRS, SAFETY, HEALTH, ENVIRONMENT AND SECURITY (CASHES) PLAN

### APPENDIX 13: TRAFFIC MANAGEMENT PLAN (TMP)

### APPENDIX 14: SAMPLE OUTLINE FOR SECURITY RISK MANAGEMENT PLAN **Annexes 9-22 has been included as a separate document. Kindly click on the link below to access these annexes:**

[https://docs.google.com/document/d/1auOSExvLm4s9L6dU7-yfmFhXiUQpUZ\\_4/edit?usp=sharing&ouid=105125066221616743658&rtpof=true&sd=true](https://docs.google.com/document/d/1auOSExvLm4s9L6dU7-yfmFhXiUQpUZ_4/edit?usp=sharing&ouid=105125066221616743658&rtpof=true&sd=true)