

**Federal Ministry of Education
Adolescent Girls Initiative for Learning and
Empowerment (AGILE) Project Additional
Financing (P179281)**

[Draft]
**ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

June 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Nigeria (hereinafter the Recipient) is implementing the Additional Financing of the Adolescent Girls Initiative for Learning and Empowerment Project (the Project), with the involvement of the Federal Ministry of Education (FME) through the National Project Coordinating Unit (NPCU) at the Federal level, and the respective State Ministry of Education (SME) through its Project Implementing Units (PIUs) at state level, as set out in the Financing Agreement. The World Bank has agreed to provide financing for P170664 and additional financing P179281 for the Project, as set out in the referred agreement(s). This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for Project referred to above.
2. The Federal Republic of Nigeria (hereinafter the Recipient) shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the World Bank. The ESCP is a part of the Financing Agreement and the Project Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the World Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the World Bank.
4. As agreed by the World Bank and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the Additional Financing of the Adolescent Girls Initiative for Learning and Empowerment (the Project) and the World Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the World Bank and Federal Ministry of Finance, Budget and National Planning. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the World Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	<p>Submit bi-annual] reports to the World Bank throughout Project implementation, commencing after the Effective Date.</p> <p>Submit each report to the World Bank no later than 7 days after the end of each reporting period.</p>	Federal Ministry of Education and the Participating States
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the World Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. Labor unrest, disease outbreaks and security incident.</p> <p>Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the World Bank request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the World Bank no later than 48 hours after learning of the incident or accident.</p> <p>Notify the World Bank of SEA/SH incidents within 24 hours of learning of the incident.</p> <p>Provide subsequent report to the World Bank within a timeframe acceptable to the World Bank.</p>	Federal Ministry of Education and the Participating States
C	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the World Bank.</p>	Submit the monthly reports to the World Bank as annexes to the reports to be submitted under action A above.	Federal Ministry of Education and the Participating States Environmental and Social team
D	<p>NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS</p> <p>Notify the World Bank of any referral submitted to the Dispute Avoidance and Adjudication Board (DAAB) to initiate a process of compliance review in relation to a contractor's obligations to prevent and respond to sexual exploitation and abuse (SEA), and/or sexual harassment (SH) specified in the respective works contract with such contractor; and, in the event of any such referral, notify the World Bank of: (i) the DAAB's decision on such referral; (ii) the contractor's Notice of Dissatisfaction, if any, with such DAAB decision; (iii) any notification received on</p>	No later than 7 days after the issuance or receipt, as applicable, of the relevant document (i.e., referral to the DAAB, issuance of DAAB decision, Notice of Dissatisfaction, notice of commencement of emergency/full arbitration, emergency/full arbitration order, as applicable).	Federal Ministry of Education and the Participating States

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	the commencement of an emergency arbitration proceeding or full arbitration proceeding in relation to the DAAB’s decision; and (iv) the resulting emergency arbitration order and/or full arbitration order, if any.		
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain an environmental and social management unit within the State Project Implementation Units (SPIU) that is tasked with ESHS management with qualified staff and resources to support management of ESHS risks and impacts of the Project including an Environmental Specialist, a Social Specialist, a Gender-based specialist, and a Security Advisor.</p>	<p>Maintain the E&S unit in the NPCU and establish an E&S unit in the SPIUs as set out in the loan agreement.</p> <p>The Environmental, and Social and GBV/Gender Officers will be fully deployed from the Ministry of Environment and the Ministry of Women Affairs respectively prior to Project effectiveness, and thereafter maintain these positions throughout Project implementation. The Security Advisor will be hired no later than three months after effectiveness and thereafter maintained throughout Project implementation.</p>	Federal Ministry of Education and the Participating States
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. Adopt and implement site-specific Environmental and Social Management Plan (ESMP) for construction and rehabilitation works, consistent with the relevant ESSs.</p> <p>2. Adopt and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p> <p>3. NPCU and SPIUs to adopt and implement the Environmental and Social Management Framework (ESMF) and SPIUs to adopt and implement site-specific Environmental and Social Management Plan (ESMP), as set out in the ESMF.</p>	<p>1. Adopt the ESMP prior to construction and rehabilitation works, and thereafter implement the ESMP throughout Project implementation.</p> <p>2. Adopt the ESMF prior to completion of project appraisal, and thereafter implement the ESMF throughout Project implementation.</p> <p>3. Adopt the ESMP before launching the bidding process for the respective subproject prior to the carrying out of subproject activity that requires the adoption of such ESMP. Once adopted, implement the respective ESMP throughout Project implementation.</p>	Federal Ministry of Education and the Participating States
1.3	<p>MANAGEMENT OF CONTRACTORS</p>	As part of the preparation of procurement documents and respective contracts.	Federal Ministry of Education and the Participating States

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.	Supervise contractors throughout Project implementation.	
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the World Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p> <p>Additionally, each state will engage Technical Assistants (TAs) on Environment (1) and Social/GBV (1).</p>	<p>Throughout Project implementation.</p> <p>The Technical Assistants on Environment and Social/GBV will be hired and engaged within one month after project effectiveness. TAs should be maintained in the first year of implementation and renewed if required throughout Project implementation</p>	Federal Ministry of Education and the Participating States environment and social team
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	Adopt the LMP prior to completion of project appraisal and thereafter implement the LMP throughout Project implementation.	Federal Ministry of Education and the Participating States
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.	Federal Ministry of Education and the Participating States environment and social team
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Adopt and implement a Waste Management Plan (WMP) as part of the ESMP, to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	Adopt the WMP (as part of the ESMP) and implement the WMP throughout Project implementation.	Federal Ministry of Education and the Participating States environment and social team
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.2 above.</p>	Adopt the ESMP prior to construction and rehabilitation works, and thereafter implement the ESMP throughout Project implementation.	Federal Ministry of Education and the Participating States

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2 above.	Adopt the ESMP prior to construction and rehabilitation works, and thereafter implement the ESMP throughout Project implementation.	Federal Ministry of Education and the Participating States
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities including behavior of Project workers, risks of labor influx, response to emergency situations and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.	Adopt the ESMP prior to construction and rehabilitation works, and thereafter implement the ESMP throughout Project implementation.	Federal Ministry of Education and the Participating States
4.3	SEA AND SH RISKS Adopt and implement a SEA/SH Action Plan as part of the GBV Action Plan and Accountability & Response Framework to assess and manage the risks of SEA and SH.	Adopt the SEA/SH Action Plan and Accountability & Response Framework before construction, and thereafter implement throughout Project implementation.	Federal Ministry of Education and the Participating States
4.4	SECURITY MANAGEMENT Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, as set out in the ESMF and Security Management Plan, guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.	Prior to engaging security personnel and thereafter implemented throughout Project implementation.	Federal Ministry of Education and the Participating States
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT POLICY FRAMEWORK Adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.	Adopt the RPF prior to project appraisal and thereafter implement the RPF throughout Project implementation.].	Federal Ministry of Education and the Participating States
5.2	RESETTLEMENT PLANS Adopt, and implement Resettlement Action Plans (RAPs) in accordance with ESS 5 and consistent with the requirements of the Resettlement Policy Framework (RPF) and consistent with ESS5.	Adopt and implement the respective RAP, including ensuring that before taking possession of the land and related assets, full compensation has been provided and displaced people have been resettled and moving allowances have been provided.	Federal Ministry of Education and the Participating States
5.3	GRIEVANCE MECHANISM Adopt and implement a grievance mechanism to address resettlement related complaints, as described in the RPF, SEP and RAP.	Adopt and implement the grievance mechanism prior to commencement of resettlement activities	Federal Ministry of Education and the Participating States
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
6.1	<p>BIODIVERSITY RISKS AND IMPACTS Adopt and implement a Biodiversity Management Plan (BMP) as part of the site-specific ESMP, in accordance with the guidelines of the ESMF prepared for the Project, and consistent with ESS6.</p>	Adopt the BMP prior to and during construction.	Federal Ministry of Education and the Participating States
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES: Not Applicable			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS Adopt and implement a Cultural Heritage Management Plan (CHMP) as part of the ESMF and site-specific ESMPs to be developed, and consistent with ESS8.</p>	Adopt the CHMP prior to, and during construction	Federal Ministry of Education and the Participating States
8.2	<p>CHANCE FINDS Describe and implement the chance finds procedures, as part of the ESMF and site-specific ESMPs to be developed.</p>	Implement the procedures prior to, and during construction	Federal Ministry of Education and the Participating States
ESS 9: FINANCIAL INTERMEDIARIES: Not Applicable			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p>	Adopt the SEP prior to project appraisal and thereafter implement the SEP throughout Project implementation.	Federal Ministry of Education and the Participating States
10.2	<p>PROJECT GRIEVANCE MECHANISM Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	Establish the grievance mechanism by completion of project appraisal and thereafter maintain and operate the mechanism throughout Project implementation.	Federal Ministry of Education and the Participating States
CAPACITY SUPPORT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
CS1	<ul style="list-style-type: none"> • Training of Project team on the Association procurement processes and ESF for project workers • ESF Capacity building • Specific aspects of social risk management, including GBV SEA/SH risks, resettlement planning, voluntary land donation, stakeholder engagement; impacts and mitigation measures for NPCU and PIU teams. • Implementation of Grievance Redress Mechanism • How to conduct stakeholder engagement in light of COVID-19 • Occupational Health and safety at work including those related to COVID-19 and civil works • Addressing SEA/SH issues in World Bank financed Projects • Addressing E&S requirement in Community Driven Development projects • Security Protocol and Management 	During project implementation	Federal Ministry of Education and the Participating States
CS2	<ul style="list-style-type: none"> • Occupational Health and safety at work including those related to COVID-19 and civil works • Emergency prevention and preparedness and response Strategy • Security Management Strategies 	During project implementation	Federal Ministry of Education and the Participating States