

**Federal Republic of Nigeria  
Ministry of Health and Social Welfare**

**Nigeria: Primary Healthcare Provision  
Strengthening Program  
(P504693)  
(Part 2 - Investment Project Financing  
Component)**

**For Negotiations**

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

**August 16, 2024**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Nigeria (the Recipient) will implement the Nigeria Primary Healthcare Provision Strengthening Program – HOPE PHC (the Operation), with the involvement of the Federal Ministry of Health and Social Welfare (FMOHSW) [and] [cause the Operation to be carried out by the following implementing entities (together the “Operation Implementing Entities”): (a) at the federal level, the National Primary Healthcare Development Association (NPHCDA), National Health Insurance Agency (NHIA), and Nigeria Center for Disease Control (NCDC), and, (b) in Participating States, the respective State Ministry of Health (SMoH), State Primary Healthcare Development Board (SPHCDB), State Supported Health Insurance Agency (SSHIA), Hospitals Management Board (HMB), and Drug Management Agency (DMA)] as set out in the Financing Agreement and the Grant Agreement (the “Agreements”). The International Development Association (the Association) and the International Bank for Reconstruction and Development, acting jointly as administrator of the Global Financing Facility, has agreed to provide financing for the Operation as set out in the referred Agreements. The Operation consists of a Program-for-Results Financing component described in Part 1 of Schedule 1 to the Agreements (the “Program”) and an IPF Component described in Part 2 of Schedule 1 to the Agreements (the “Project”).
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, 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 a manner acceptable to the Association. Once adopted, the said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the Ministry of Health & Social Welfare and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient’s Coordinating Minister of Health & Social Welfare. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health, and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&amp;S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanisms.</p>	Submit Six-monthly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than 14 days after the end of each reporting period.	National Program Coordination Unit (NPCU) within the SWAp Coordination Office (SCO) at the Federal Ministry of Health and Social Welfare (FMOHSW)
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the Association of any incident or accident related to the Project that has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public, or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury [Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>Notify the Association of fatality or SEA/SH incidents within 24 hours of learning of the incident.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association.</p>	NPCU
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain a qualified one Environmental and one Social staff and resources to support the management of ESHS risks and impacts of the Project at the [NPCU] and Participating states</p>	Hire one Environmental specialist and one Social specialist no later than one month after the Effective Date and maintain the position throughout Project implementation.	NPCU and BHCPF State Oversight Committees (BCPPF-SOCs)
1.2	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>Prepare, consult upon, adopt, disclose, and implement the following instruments in accordance with the ESSs and in a manner acceptable to the Association:</p> <p>i. Stakeholder Engagement Plan (SEP)</p>	<p>Prepare, disclose, consult upon, and adopt the SEP by August 19, 2024.</p> <p>Implement requirements of the SEP throughout Project implementation.</p>	NPCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> <li>ii. Labour Management Plan</li> <li>iii. Environmental and Social (E&amp;S) Screening Checklist</li> <li>iv. Environmental and Social Assessment</li> </ul>	<p>LMP shall be prepared, disclosed, consulted, and adopted no later than three months after the Effective Date and implemented throughout the Project lifecycle.</p> <p>E&amp;S Screening Checklist shall be developed no later than three months after the Effective Date and implemented by the SPIUs during Project implementation to screen activities for E&amp;S impacts.</p> <p>Environmental and Social Assessment report shall be prepared by the NPCU and submitted to the Association at the end of each calendar year, no later than 15<sup>th</sup> December of each year.</p>	
1.3	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project are carried out by terms of reference acceptable to the Association that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	NPCU
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Adopt, and implement the Labor Management Procedures (LMP) including, inter alia, provisions on working conditions, management of workers' relationships, occupational health and safety (OHS) (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 contracted workers such as Independent Verification Agencies (IVAs) or Monitoring and Evaluation (M&amp;E) consultants, consistent with ESS2.</p>	Adopt the LMP no later than three months after the Effective Date, but before engaging Project workers, and thereafter implement the LMP throughout Project implementation.	NPCU/BHCPF-SOC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.2	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b> Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Establish the grievance mechanism before engaging Project workers and thereafter maintain and operate it throughout Project implementation	NPCU/BHCPF-SOC
2.3	<b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b> Adopt and implement OHS as an annex to the LMP to mitigate risks to the human population and the environment because of transportation of goods and project personnel, e-wastes from procurement of electronic and solar equipment, and minor labor-related risks.	Same timeframe as action 2.1	NPCU/ BHCPF-SOC
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b> This standard is not relevant to the Project.			
<b>ESS 4: COMMUNITY HEALTH AND SAFETY:</b> This standard is not relevant to the Project.			
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b> This standard is not relevant to the Project.			
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES:</b> This standard is not relevant to the Project.			
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES:</b> This standard is not relevant to the Project.			
<b>ESS 8: CULTURAL HERITAGE:</b> This standard is not relevant to the Project.			
<b>ESS 9: FINANCIAL INTERMEDIARIES:</b> This standard is not relevant to the Project.			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b> Prepare, disclose, consult upon, 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.	Prepare, disclose, consult upon, and adopt the SEP by August 19, 2024. Implement the SEP throughout the Project implementation.	NPCU
10.2	<b>PROJECT GRIEVANCE MECHANISM</b> Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate the resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.  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.	Establish the grievance mechanism no later than three (3) months after the Effective date and thereafter maintain and operate the mechanism throughout Project implementation.  While the operationalization of the Project level GRM is pending, complaints will be submitted through the FMOHSW existing complaints channels such as SERVICOM.	NPCU
<b>CAPACITY SUPPORT</b>			
CS1	Capacity support to NPCU staff, stakeholders, and Project workers on:	Throughout Project implementation.	NPCU/ BHCPF-SOC

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> <li>• The E&amp;S implementation and management in a PforR operation, results verification, consultation, communication, etc.</li> <li>• ESF Fundamentals</li> <li>• GRM Training</li> <li>• Gender-based Violence prevention and response plan</li> <li>• Stakeholder mapping and engagement</li> <li>• E-waste and Healthcare Waste Management</li> <li>• OHS measures including on emergency prevention and preparedness.</li> <li>• Traffic management and Incident prevention</li> </ul>	.	