

**Adolescent Girls Initiative for Learning and  
Empowerment (AGILE) Project (P170664)**  
**ENVIRONMENTAL and SOCIAL  
COMMITMENT PLAN (ESCP)**

**May 2020**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Nigeria (the Recipient) is implementing the Adolescent Girls Initiative for Learning and Empowerment Project (the Project), with the involvement of the following ministries and bodies: The Federal Ministry of Education (FME) and the States selected to participate in the Project (Participating States). The International Development Association (the Association) has agreed to provide financing for the Project.
2. The Federal Republic of Nigeria through FME and Participating States will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out a summary of material measures and actions and any specific documents or plans, as well as the timing for each of these.
3. The Federal Republic of Nigeria will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Plans (ESMP), Resettlement Action Plans (RAP) and Stakeholder Engagement Plans (SEP), and the timelines specified in these E&S documents.
4. The Federal Republic of Nigeria is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry or Participating States, referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by The Federal Republic of Nigeria as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and The Federal Republic of Nigeria, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, The Federal Republic of Nigeria will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the Federal Republic of Nigeria. The Federal Republic of Nigeria will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Federal Republic of Nigeria shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<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 Environmental and Social documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	<p><i>Each Six (6) months throughout project implementation</i></p> <p><i>Starting December 2020</i></p>	FME and the Participating States.
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the Association of any incident or accident related to or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including without limitation any allegations of gender-based violence, Project-related occupational accidents or fatalities, or labor unrest. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken to address it, and include information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p><i>Promptly and no later than 48 hours after taking notice of the incident or accident. Report to the Association.</i></p> <p><i>A subsequent report would be provided within a timeframe acceptable to the Association, as requested.</i></p>	FME and the Participating States.
C	<p><b>CONTRACTORS MONTHLY REPORTS</b></p> <p>Contractors are required to provide monthly monitoring reports to the FME and the Participating States. The monthly reports would be submitted to the Association by the Federal Republic of Nigeria upon request.</p>	<p><i>Monthly</i></p>	FME and the Participating States.
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain throughout project implementation an organizational structure with qualified staff and resources to support management of Environmental &amp; Social risks in sufficient numbers including at least one Environmental Specialist and one Social Specialist in the State and Federal PIU.</p>	<p><i>An organizational structure including the hiring of one (1) Environmental Specialist and one (1) Social Specialist will be established within one month after project effectiveness</i></p> <p><i>The organizational structure, including the specialists, should be maintained throughout Project implementation</i></p>	FME and the Participating States.
1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <p>Adopt, disclose and implement the Environmental and Social Management Framework (ESMF) prepared for the Project, in a manner acceptable to the Association. The Recipient will prepare an ‘expanded ESMF’ within which a social assessment will be embedded. The assessment will help the Recipient understand the key social inclusion and risk issues and determine the potential impacts on different stakeholders. The ESMF, shall include a section on Labor Management Procedure and a social analysis that will identify key social inclusion and risk issues, and the impact on different stakeholders.</p>	<p><i>The ESMF was disclosed on 29 January 2020 and shall be implemented throughout Project implementation.</i></p>	FME
1.3	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>Screen any proposed subproject in accordance with the ESMF prepared for the Project, and, thereafter, draft, adopt, and implement the subproject Environmental and Social Management Plan (ESMP), as required, in a manner acceptable to the Association.</p>	<p><i>The ESMF, RPF, LMP and SEP were disclosed on 29<sup>th</sup> January 2020</i></p> <p><i>ESMP(s) will be prepared once subproject site is identified and prior to launching the bidding process.</i></p>	FME and the Participating States.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&amp;S documents and/or plans, and the Labor Management Procedures and GBV/SEA Action Plan measures into the ESHS specifications of the procurement documents with contractors. Contractors will be evaluated based on inter alia their response to the E&amp;S requirements.</p> <p>Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts.</p>	<p><i>Prior to launching bidding processes</i></p> <p><i>Maintain procedures for management of and ensure compliance by contractors and subcontractors throughout Project implementation</i></p>	Participating States.
1.5	<p><b>MANAGEMENT OF FEDERAL MINISTRY OF EDUCATION AND THE PARTICIPATING STATES.</b></p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&amp;S documents and/or plans, the Labor Management Procedures, and the GBV/SEA Action Plan into the subsidiary agreement to be entered between the Recipient and the Participating States for the implantation of the Project.</p>	Before commencement of Project activities in a Participating State	Recipient
10	<p><b>STATE-LEVEL CAPACITY BUILDING</b></p> <p>Conduct state-level institutional capacity assessment of implementing agencies in selected states and implement capacity building activities to close identified gaps.</p>	<i>Within the first year of Project implementation</i>	FME and the Participating States.
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Update, adopt, and implement the Labor Management Procedure (LMP) that have been developed for the Project and also included as a chapter in the ESMF.</p>	The ESMF and LMP were disclosed on 29 January 2020	FME and the Participating States.
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish, maintain and operate a grievance mechanism for Project workers as described in the LMP and consistent with ESS2.</p>	<i>Prior to engaging project workers and maintained throughout Project implementation</i>	FME and the Participating States.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.3	<p><b>CAPACITY BUILDING OF PROJECT WORKERS</b></p> <p>Implement capacity building of Project Workers to increase awareness of social and environmental risks, code of conduct, mitigation measures including the association's procurement processes and ESF.</p>	<i>Within 2 months after project effectiveness for FPCU and SPIUs and throughout Project implementation when relevant</i>	FME and the Participating States.
2.4	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>Prepare, adopt and implement occupational, health and safety (OHS) measures specified in the ESMPs.</p>	<i>ESMPs to be prepared once subproject site is known and prior to launching bidding process and maintained throughout Project implementation.</i>	FME and the Participating States.
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b>			
3.1	<p><b>WASTE MANAGEMENT PLAN:</b></p> <p>Prepare, adopt, and implement a Waste Management Plan, acceptable to the Association, to manage the waste that may be generated from the minor civil works following the protocol of reduce, reuse and recycle. In addition, to encourage and promote energy efficiency, pollution prevention and management, the Recipient will use energy saving and efficient bulbs including biodegradable materials where applicable.</p>	<i>This will be prepared as part of the Environmental and Social Management Plan(s) to be prepared once subproject site is identified and prior to launching bidding process and implemented throughout Project implementation</i>	FME and the Participating States.
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY:</b></p> <p>Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs to be developed under action 1.3 above.</p>	<i>By commencement of civil works and maintained throughout Project implementation.</i>	FME and the Participating States.
4.2	<p><b>COMMUNITY HEALTH AND SAFETY:</b></p> <p>Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities, and include these measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Association. These may include, where relevant, mitigation measures to minimize/manage the risks/impacts associated with uncovered or barricaded or unfenced and/or unsigned hazardous such as excavated sites, trenches, and exposed electric cables.</p>	<i>By commencement of civil works and maintained throughout Project implementation.</i>	FME and the Participating States.

4.3	<p><b>GBV AND SEA RISKS:</b> Prepare a Gender-Based Violence (GBV) Assessment to inform the development of the GBV Action Plan.</p> <p>Prepare, adopt, and implement a stand-alone GBV/ SEA/SH Action Plan, to assess and manage the risks of GBV and sexual exploitation and abuse (SEA). The GBV/ SEA/SH Action Plan will be reviewed bi-annually and updated annually by the respective project implementing entities in a manner acceptable to the Association.</p>	<p>The Recipient prepared a GBV Assessment and it was cleared by the Association on 26 February 2020.</p> <p><i>Submit the GBV/ SEA/SH Action Plan for the Association's approval before the preparation of the procurement documents for works/Project activities at a school. Once approved, the GBV/ SEA/SH Action Plan is maintained and implemented throughout Project implementation.</i></p>	FME and the Participating States.
4.4	<p><b>SECURITY RISKS:</b> Given the inclusion of Borno State, as well as potential security risks in other participating states, the Recipient shall prepare a Security Risk Assessment (SRA). Where relevant, as part of the ESMP, the Recipient will prepare, adopt, and implement a Security Personnel Management Plan consistent with the requirements of ESS4, in a manner acceptable to the Association. In implementing the security risk prevention and mitigation measures, the Recipient will be guided by the principles of proportionality and Good International Industry Practice (GIIP), and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of security personnel.</p>	<p><i>The SRA will be developed before the carrying out of the respective Project activity and no later than within 6 months of Project Effectiveness.</i></p> <p><i>The Security Personnel Management Plan shall be adopted and implemented in a manner satisfactory to the Association, prior to engaging security personnel and thereafter implemented throughout Project implementation.</i></p>	FME and the Participating States.
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT:</b>			
5.1	<p><b>RESETTLEMENT PLANS:</b> The project is not planning to finance activities that will involve land acquisition, restrictions on land use, or involuntary resettlement. Nonetheless, risks remain as a result of the possibility of displaced people occupying abandoned schools that are identified for refurbishment. Prior to any refurbishment or renovation of schools, the recipient will prepare, adopt, and implement resettlement plans (RAPs) in accordance with ESS 5 and consistent with the requirements of the Resettlement Policy Framework (RPF) that has been prepared for the Project, and thereafter adopt and implement the respective RAPs before carrying out the associated activities, in a manner acceptable to the Association.</p>	<p>The RPF was disclosed and adopted on 29 January, 2020 and shall be maintained throughout Project implementation.</p> <p><i>RAPs to be prepared once subproject site is known and prior to launching bidding process</i></p>	FME and the Participating States.
5.2	<p><b>GRIEVANCE MECHANISM</b> Prepare, adopt, maintain and operate a grievance mechanism to address resettlement related complaints, as described in the SEP.</p>	<p><i>Prior to commencement of resettlement activities.</i></p>	FME and the Participating States.

<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES:</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS:</b> Prepare, adopt, and implement site specific ESMPs that include mitigation measures to minimize and manage the risks and impacts associated with natural habitats, in accordance with the guidelines of the ESMF prepared for the Project, and in a manner acceptable to the Association.	<i>Prior to construction of structure that may affect biodiversity.</i>  <i>ESMP(s) shall be prepared once subproject site is identified and prior to launching the bidding process and implemented throughout the project.</i>	FME and the Participating States.
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES.</b> There are no Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the Project area. Therefore, ESS7 is not relevant for the Project.			
<b>ESS 8: CULTURAL HERITAGE:</b>			
8.1	<b>CHANCE FINDS:</b> The project will not finance activities that will affect cultural heritage however, the treatment of Physical Cultural Resources (PCR) including archaeological relics, fossils, human graves, shrines, sacred trees or groves that may be encountered will follow a Chance Finds Procedure that will be elaborated, adopted and implemented as described in the ESMP.s	<i>Environmental and Social Management Plan(s) including Chance Find Procedure acceptable to the Association will be prepared once subproject site is identified and prior to launching the bidding process. Implemented throughout Project implementation.</i>	FME and the Participating States.
<b>ESS 9: FINANCIAL INTERMEDIARIES:</b> The Project will not involve the use of financial intermediaries. ESS9 not relevant.			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b> Prepare, adopt, disclose, and implement the Stakeholders Engagement Plan (SEP), including GRM.  SEP to be incorporated into the Project’s management system, adequate staffing and budget will be allocated for the implementation of the SEP.	<i>The SEP was disclosed on 29 January 2020. SEP to be implemented throughout Project implementation.</i>	FME and the Participating States.
10.2	<b>PROJECT GRIEVANCE MECHANISM:</b> Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP.	<i>Grievance mechanism to be established by Effectiveness and operated throughout Project implementation.</i>	FME and the Participating States.



CAPACITY SUPPORT (TRAINING)			
CS1	Training of Project team on the Association procurement processes and ESF for project workers	<i>Within two months after effectiveness and throughout the project as required</i>	FME and the Participating States.
CS2	Training on occupational health and safety for project workers	<i>Prior to commencement of civil workers and as required during project implementation</i>	FME and the Participating States. Funding from project budget