

**NIGERIA COVID-19 PREPAREDNESS AND
RESPONSE PROJECT (P173980)**

**[Draft/Version for Negotiations]
ENVIRONMENTAL and SOCIAL
COMMITMENT PLAN (ESCP)**

May 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Nigeria (hereinafter the Recipient) shall implement the NIGERIA COVID-19 Preparedness and Response Project with the involvement of the Federal Ministry of Health (MoH) through the Project Implementing Unit within the Nigeria Center for Disease Control (NCDC) at the federal level, and the respective State Ministry of Health through its Project Implementing Unit at State level. The International Development Association (hereinafter the Association) has agreed to provide financing for the Project.
2. The Recipient shall 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 material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The Recipient is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
4. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by the Recipient as required by the ESCP and the conditions of the legal agreement, and the Association shall monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
5. As agreed by the Association and the Recipient, 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 Recipient and/or any delegated agencies shall agree to the changes with the WB and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the WB and the Recipient or delegated agencies. The Recipient or delegated agencies shall promptly disclose the updated ESCP.
6. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Recipient 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
MONITORING AND REPORTING		
A	<p>REGULAR REPORTING: 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, stakeholder engagement activities and grievances log.</p>	Starting from the Effective Date, every six-months during the Project's implementation in conjunction with the Project's progress reports.
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
1.1	<p>ORGANIZATIONAL STRUCTURE:</p> <p>a. The Federal MoH shall establish and maintain a project implementation unit (PIU) within the NCDC with qualified staff and resources to support the overall management of ESHS risks and impacts of the Project.</p> <p>b. Each State MOH shall establish and maintain a project implementation unit (PIU) within its State Epidemiological Unit with qualified staff and resources to implement and coordinate ESHS activities at the State level.</p>	<p>a. Federal MoH/NCDC-PIU to be maintained throughout Project implementation. In addition to the PIU coordinator, the following staff shall be hired at the Federal MoH/NCDC-PIU within 30 days of the Effective Date and maintained throughout Project implementation:</p> <p>One Environmental Specialist, one Social Specialist and one Health Communication Specialist. The current PIU E&S staff implementing the REDISSE II Project shall support the implementation of the ESHS activities until the appointment of the additional specialists specified above.</p> <p>b. State MoH-PIUs to be maintained throughout Project implementation. In addition to the PIU coordinator, the following staff shall be hired at each State MOH-PIUs within 30 days of the Effective Date and maintained throughout Project implementation:</p> <p>One additional Environmental, one Social and one Communication Specialists. The</p>
<p>a. Federal MoH/NCDC</p> <p>b. State MOH</p>		

		current State PIU E&S staff implementing the REDISSE II Project shall support the implementation of the ESHS activities at the State level until the appointment of the additional specialists specified above	
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</p> <p>a. Assess the environmental and social risks and impacts including SEA/SH risks of proposed Project activities, in accordance with the Environmental and Social Management Framework (ESMF) to be updated, disclosed, and adopted for the Project, including to ensure that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, have access to the development benefits resulting from the Project. The ESMF will be used to screen and identify the risks related to contracting and/or utilizing security forces to support e.g. construction of isolation units or other relevant activities supported under the project. In doing so, the environmental and social assessment will be guided by the principles of proportionality and GIIP, and by applicable law, in relation to engaging security forces, rules of conduct, training, equipping, and monitoring of security forces.</p> <p>b. Prepare, disclose, adopt, and implement any environmental and social management plans or other instruments required for the respective Project activities based on the assessment process, in accordance with the ESSs, the ESMF, the ESHGs, and other relevant Good International Industry Practice (GIIP) including relevant WHO Guidelines on COVID-19 response, in a manner acceptable to the Association.</p> <p>c. Incorporate the relevant aspects of this ESCP, including any environmental and social management plans or other instruments, ESS2 requirements, and any other required ESHS measures, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising</p>	<p>a.</p> <p>The existing ESMF of REDISSE II shall be updated, adopted for this Project and disclosed within 30 days after the Effective Date. Until the ESMF is approved, the Project shall apply the relevant WHO guidelines on COVID-19 response in a manner consistent with ESS1. Assessment to be conducted before carrying out relevant Project activities.</p> <p>b. Before carrying out the relevant Project activities, and thereafter throughout the carrying out of such activities.</p> <p>a. Before launching the procurement process for the relevant Project activities, and thereafter throughout the carrying out of such activities.</p> <p>b. Throughout Project implementation.</p>	MoH/NCDC/-PIU and State Level MOH -PIU

	<p>firms comply with the ESHS specifications of their respective contracts.</p> <p>d. Update environmental and social management plans or other instruments based on updated guidance by WHO on COVID19.</p>		
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	<p>EXCLUSIONS: Exclude the following types of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> • Activities that have high probability of causing permanent and/or irreversible adverse effects to human health and/or the environment • Activities that may have significant adverse social impacts and may give rise to significant social conflict • Activities that may cause long term, permanent and/or irreversible (e.g. loss of major natural habitat) adverse impacts • Activities that may involve resettlement or land acquisition/use restriction, or adverse impacts on cultural heritage; • All the other excluded activities set out in the ESMF of the Project. 	During the assessment process conducted under action 1.2.a. above.	MoH/NCDC-PIU
1.4	Provide medical and emergency services and supplies based on the urgency of the need, in line with the latest data related to the prevalence of the cases.	Throughout Project implementation	MoH/NCDC-PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT: Labor Management Procedures (LMP) shall be prepared, disclosed, adopted, and implemented consistent with ESS 2, in a manner acceptable to the Association. The LMP shall be incorporated into the updated ESMF.</p>	LMP shall be prepared, disclosed, adopted and incorporated in the ESMF within 30 days of the date of the Effective Date. The LMP shall be updated and revised periodically as necessary and implemented throughout Project implementation.	MoH/NCDC-PIU
2.2	The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association, including through, inter alia, implementing adequate occupational health and safety measures (including emergency preparedness and response measures), setting out grievance arrangements for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms specifically on labor management, worker accommodations, grievance procedures and SEA/SH policies.	Throughout Project implementation.	MoH/NCDC-PIU
2.3	The Recipient shall implement adequate occupational health and safety measures (including emergency preparedness and response measures) in line with the updated ESMF and WHO guidelines on COVID19 in all facilities, including laboratories, quarantine and isolation centers, and screening posts.	Throughout Project implementation.	MoH/NCDC-PIU
2.4	The Recipient shall ensure a non-discriminatory, decent work environment; including by ensuring that all health workers adhere to the WHO Code of Ethics and Professional conduct.	Throughout Project implementation.	MoH/NCDC-PIU
2.5	The Recipient shall implement grievance procedures set forth in the SEP	Throughout Project implementation	MoH/NCDC-PIU

	and establish a grievance hotline and assignment of focal points to address these grievances within MOH.		
2.6	The Recipient will ensure that specific prohibitions will be enacted in the deployment of security personnel for the construction activities, including no child labor and no forced labor.	Throughout Project implementation	MoH/NCDC-PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, measures to manage health care wastes and other types of hazardous and non-hazardous wastes. Update the National Health Care Waste Management Plan (NHCWMP) for the REDISSE II Project which includes Medical Waste Management procedures.		
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, measures to: minimize the potential for community exposure to communicable diseases; ensure that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable have access to the development benefits resulting from the Project; manage the risks of labor influx and use of security forces; and prevent and respond to sexual exploitation and abuse, and sexual harassment.	Throughout Project implementation.	MoH/NCDC-PIU
4.2	The Recipient will avoid or minimize the potential for community exposure to COVID 19 that could result from Project activities, taking into consideration differentiated exposure to and higher sensitivity of vulnerable groups. To this end, the ESMF and site specific ESMPs shall be prepared, consulted upon, approved and disclosed to mitigate the risks from civil works/rehabilitation of existing health buildings at community levels. In addition, the Project shall apply the WHO standards on COVID-19 response in a manner consistent with ESS1.	Throughout Project implementation	MoH/NCDC-PIU
4.3	SEA/SH risks related to the implementation of the COVID 19 operation shall be assessed and addressed during implementation, including screening and identifying corresponding measures to prevent and mitigate the SEA/SH risks. SEA/SH risks screening and mitigation measures shall be updated in the ESMF.	Throughout Project implementation	MoH/NCDC-PIU

4.4	Although the project activities are not envisaged to result in the large-scale use of security personnel, conduct Security Risk Assessments wherever relevant. Wherever security personnel is engaged in connection with Project activities, the Recipient will ensure that any security personnel engaged in the relevant activities associated with the Project have been: (i) screened to confirm that they have not engaged in past unlawful or abusive behavior, including SEA, SH or excessive use of force; (ii) adequately instructed and trained, on a regular basis, on the use of force and appropriate behavior and conduct (including in relation to SEA and SH); (iii) deployed in a manner consistent with applicable national law; and (iv) will follow strict rules of engagement, code of conduct, and avoid any escalation. The ESMF will provide guidance regarding how these measures will be integrated.	Throughout Project implementation	MoH/NCDC-PIU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	Not relevant		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	Not relevant.		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	Not relevant.		
ESS 8: CULTURAL HERITAGE			
8.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.		
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Not relevant.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN: Update, disclose and implement the Stakeholder Engagement Plan (SEP) consistent with ESS10, and in line with WHO provisions “Risk communication and community engagement (RCCE) readiness and response to the 2019 novel coronavirus (2019-nCoV)” (January 26, 2020) in a manner acceptable to the Association.	A draft SEP has already been prepared and disclosed and shall be updated no later than 30 days following the Effective Date. The SEP shall be implemented throughout Project implementation.	MoH/NCDC-PIU and

10.3	<p>GRIEVANCE MECHANISM: Accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Association. The project-level GRM shall accept grievances related to security and the use of security personnel as is required for any other complaint, and address worker and community concerns related to security personnel.</p>	The project Grievance Mechanism shall be operational and adequately resourced no later than 30 days after the Effective Date and thereafter maintained throughout Project implementation.	MoH/NCDC/-PIU and State Level MOH - PIU
CAPACITY SUPPORT (TRAINING)			
A.	<p>Training topics for personnel involved in Project implementation shall include (not limited to):</p> <ul style="list-style-type: none"> • COVID-19 Infection Prevention and Control Recommendations • Laboratory biosafety guidance related to the COVID-19 • Specimen collection and shipment • Standard precautions for COVID-19 patients • Risk communication and community engagement • WHO and Africa CDC guidelines on quarantine including case management • OHS protocols • Emergency response Preparedness • Hazardous Waste Management • Development and testing of a risk communication strategy and training materials Stakeholder engagement and community engagement 	Throughout Project implementation	MoH/NCDC/-PIU and State Level MOH - PIU