

Public Disclosure Authorized

**Federal Republic of Nigeria and Borno State Government**

**Modernizing Financial and Data Management Systems  
(P178727)**

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

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June 2022

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

### INTRODUCTION

1. The Federal Republic of Nigeria; Borno State Government (Recipient) will implement the Modernizing Financial and data Management Systems Project (P178727), with the involvement of the Borno State Government, as set out in the Project Grant Agreement. The International Bank for Reconstruction and Development (the Bank), acting as the administrator of Modernizing Financial and data Management Systems, has agreed to provide financing for the Project, as set out in the referred agreement.
2. The Federal Republic of Nigeria; Borno State Government (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 International Bank for Reconstruction and Development (the World Bank). The ESCP is a part of the Project Grant Agreement unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Federal Republic of Nigeria; Borno State Government 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 International Bank for Reconstruction and Development (the World Bank). Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the International Bank for Reconstruction and Development (the World Bank).
4. As agreed by the International Bank for Reconstruction and Development (the World Bank) and the Federal Republic of Nigeria; Borno State Government (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 Federal Republic of Nigeria; Borno State Government (Recipient) through Borno State Ministry of Finance, Budget and Economic Planning and the International Bank for Reconstruction and Development (the World Bank) agree to update the ESCP to reflect these changes through an exchange of letters signed between the International Bank for Reconstruction and Development (the World Bank) and Federal Republic of Nigeria; Borno State Government Commissioner for Finance, Budget and Economic Planning, Borno State Ministry of Finance, Budget and Economic Planning. The Federal Republic of Nigeria; Borno State Government 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>The Recipient on a quarterly basis, will prepare and submit to the Association 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 mechanism(s). The Recipient shall also submit any report requested therein. In addition, activities on the SEP and AESR will also be documented and disclosed.</p>	<p>Submit quarterly report to the Bank throughout project implementation, commencing. Submit report not later than 5 days after end of each report period. A compilation of these reports will be provided at the end of the project.</p>	<p>Project Coordinator / M&amp;E officer</p>
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the [World Bank/Bank/Association] 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 [specify other examples of incidents and accidents, as appropriate for the type of operation]. 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>a. Subsequently, at the [World Bank/Bank/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 Bank not later than 48 hours, after learning of the incident or accident.</p> <p>Provide subsequent report within a time frame acceptable to the Bank</p>	<p>Project Coordinator / Safeguard officers</p>
C	<p><b>CONTRACTORS’ MONTHLY REPORTS</b></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/Bank/Association].</p>	<p>Submit the monthly report to the Bank upon request and include same as annex to the quarterly report under action A above.</p>	<p>Project Coordinator / M&amp;E / safeguards officers</p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain a Project Coordination Unit (PCU) - consisting of qualified personnel including one environmental and social officer, one GRM officer and one Gender focal person including consultants for capacity support on environmental and social due diligence.</p>	<p>Establish and maintain PCU as set out in the grant agreement and maintain throughout project implementation.</p>	<p>Project Coordinator</p>

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1.2	<p><b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <ol style="list-style-type: none"> <li>1. Conduct environmental and social screening prior to installation of the IFMIS equipment's.</li> <li>2. Develop occupational health and safety plan</li> </ol>	<p>Submit to the Bank screening report prior to installation of equipment's. Adopt and implement occupational and health and safety plan throughout project implementation. .</p>	<p>Project Coordinating Unit (PCU) Focal Person, MCRP Safeguards person</p>
1.3	<p><b>MANAGEMENT OF CONTRACTORS / SUPPLIERS</b></p> <ol style="list-style-type: none"> <li>a. Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&amp;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.</li> </ol>	<p>As part of procurement documents and prior to preparation of tender documents.</p>	<p>Procurement officer / Project coordinator</p>
1.4	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project, including the LMP, 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>Throughout Project implementation</p>	<p>Project Coordinator / Safeguard officers</p>
<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) 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>	<p>Prior to engagement of the primary supplier / contractor</p>	<p>Project Coordinator / Safeguards officer</p>
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></p> <p>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</p>	<p>Adopt the SEP prior to commencement of project activities and implement throughout project implementation</p>	<p>Project Coordinator /Safeguards officer.</p>

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	culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.		
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>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>	Develop and operationalize project level GRM not later than 3 months after effectiveness.	Project Coordinator / Safeguards officer.
<b>CAPACITY SUPPORT</b>			
CS1	<p><b>Health and safety at work</b></p> <p>The PIU staff / supplier shall be trained on health and safety at work, including on the prevention of emergencies, and how to prepare for and respond to such situation as well as COVID-19 protocol.</p>	During the implementation of the Project	Project coordinator
CS2	<p>The PIU staff / supplier shall be trained on:</p> <ul style="list-style-type: none"> <li>• Stakeholders Mapping and Engagement</li> <li>• Environmental and Social Commitment Plan (ESCP),</li> <li>• Labour and working condition</li> <li>• Grievance Redress Procedure</li> </ul>	During project implementation.	Project Coordinator