



SPECIAL AGRO-INDUSTRIAL PROCESSING ZONES (SAPZ II)

A.3.4. Template of the ESMP mandatorily annexed to the Financing Agreement (FA)

General considerations

1. The Federal Government of Nigeria is planning to implement the Special Agro-industrial Processing Zones (SAPZ) Phase II Project (the Project) in Nigeria. The Bank has agreed to provide financing, implementation support and monitoring for the Project.
2. The Federal Government of Nigeria will implement measures and actions of this Environmental and Social Management Plan¹ (**ESMP**) so that the Project meets all the requirements of the Bank Environmental and Social Operational Safeguards (**OS**) and the National Environmental and Social policy and legal requirements.
3. Where the ESMP refers to specific plans, whether they have already been prepared or are to be developed, the ESMP requires compliance with all mandatory provisions of such plans.
4. The table below summarizes the material measures and actions that are required, the basis of the requirement, the timing of the measure or action, and the criteria to be used for determining whether the required measure or action has been successfully achieved. The Federal Government of Nigeria is responsible for compliance with all requirements of the ESMP even when implementation of specific measures and actions is conducted by an entity different from the Project Implementation Unit (PIU).
5. Implementation of the material measures and actions set out in this ESMP will be monitored and reported to the Bank by The Federal Government of Nigeria as required by the ESMP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the measures and actions throughout implementation of the Project.
6. As agreed by the Bank and the Federal Government of Nigeria, this ESMP may be revised from time to time during Project implementation, to reflect adaptive risk management of project changes and unforeseen circumstances or in response to assessment of project performance conducted under the ESMP itself. In such circumstances, the Federal Government of Nigeria will propose and agree changes with the Bank and then update the ESMP to reflect such changes.

¹ The ESMP refers to all the E&S risks/impacts and measures, as approved in all the disclosed E&S documents and agreed between the Bank and Borrower. For projects involving multiple subprojects, that are identified, prepared and implemented during the course of the project, the Borrower will need to demonstrate to the Bank, before the project appraisal, through the preparation of E&S documentation of a sample of subprojects, that it has the capacity to carry out appropriate environmental and social assessment of subprojects, and prepare and implement such subprojects in accordance with the national laws and the OSs. (*Section III.2.3 of Bank's ESP and section D of OSI*)

Material Actions² to Manage the Project's E&S Risks and Impacts		Basis for Requirement	Key Performance Indicator	Indicative Timing/Deadline
Periodic E&S implementation report to the Bank		Bank's ESP and OS1	Reports submitted in time, in good standard	Two weeks after the due period
1.	Recruitment of E and S specialists as part of the Project implementation unit	Disclosed ESIA, OS1	Seasoned E&S specialists in the PIU	By Project effectiveness date
2.	Establishment of the Project Grievance Redress Mechanism (GRM) and disclosure to Public	OS1, OS10 and National requirements	Grievance Mechanism for SAPZ II is in place and disclosed to the public	Prior to the commencement of civil works
3.	Payment of compensation and reinstallation of affected people	OS10	RAP implementation/RAP completion Audit Report	Prior to the commencement of civil works
4.	Incorporation of site-specific E&S measures in the request for proposals (RFP)	OS1 & national requirements	Site-specific E&S measures embedded in RFP	Prior to the publishing of RFP adverts.
5.	Submission of high-risk activity's Contractor ESMP (C-ESMP) to Bank clearance	Bank's ESP and OS1	C-ESMP reviewed and cleared by the Bank	Prior to the mobilization of contractor to Site
6.	Establishment of the Contractor's Grievance Mechanism (GM) and information of workers	OS1, OS2, OS10 and Bank's Disclosure and Access to Information Policy	The outcome of the Grievance Mechanism (including no. of grievances received, resolved & outstanding) reflected in the monthly E&S monitoring report	Prior to the commencement of civil works
7.	Obtaining nationally required licenses prior to commencement of subjected activities (excavations, tree-cutting, working at height, working in confined spaces, etc.)	OS1, OS2 and national labor laws	All required licenses and permits obtained and documented prior to the commencement of any regulated activity.	License application made at least 30-60 days before the planned commencement of the respective activities, allowing enough time for review and approvals
8.	Preparation, approval, and disclosure of specific E&S documents during Project implementation, including prior review of Category 1 terms of reference by the Bank	Bank's ESP, OS1 and national requirements	All required E&S documents such as ESIA/RAP reviewed, cleared & disclosed by the FMEEnv/Bank	During project implementation
9.	Engagement with concerned stakeholders of each relevant specific E&S activity	OS1, OS10, Bank's Disclosure and Access to Information Policy	Stakeholder Engagement Plan is proportionate to the nature and scale of the SAPZ II Project, and its potential risks and impacts.	During project implementation

² Please add any relevant key actions and/or indicate "Not applicable" in the third column ("Basis for requirement") for actions that are not applicable to the project.

10.	Establishment of Emergency Preparedness and Response mechanism	OS1 & OS4, national legislation on contingencies et	Establishment of EPR Plan and procedures	Prior to the commencement of civil works
11.	Appropriate and timely handling of complaints/grievances	Bank's ESP and OS1	Percentage of complaints successfully resolved to the satisfaction of the complainant within the stipulated timeline	During project implementation
12.	Notification to riparian or alert to downstream exposed peoples	Bank's ESP and OS1, applicable International Treaty/Convention ratified	Not applicable	Not applicable
13.	Capacity building of key project implementers	OS1	SAPZ II E&S performance. No. of capacity building session held No. of project implementers trained	Monthly E&S Performance Report.
14.	Implementation of ESMS/ESAP ³	OS1 and OS9, national requirements	Monthly E&S Report	Monthly
14.1	<i>Approval of any required E&S management procedure</i>	Ditto	E&S management procedure approved by the Hon. Minister of Agriculture /Designated Authority.	Monthly
14.2	<i>Establishment of the E&S unit</i>	Ditto	Addition of 2 competent E&S staffing to the existing 2 personnel at the NPCU for effective management of the E&S aspects of both SAPZ Phase I and Phase II projects. Engagement of an Environmental Safeguards Officer (ESO) and a Social Safeguards Officer (SSO) at each participating states PIU	Prior to the commencement of project implementation
14.3	<i>Capacity Building of the E&S Unit</i>	Ditto	No. of Trainings conducted	During project implementation
14.4	<i>Dedicated E&S budget line item in the annual project budget</i>	Ditto	AWPB with E&S budget line	During project implementation
14.5	<i>Processing the Value Chain E&S due diligence</i>	Ditto	Monthly E&S report	During project implementation

³ Applies to non-sovereign operations and public sector projects implemented by permanent autonomous Agencies/Institutions.

15.	Suspending works in the event of EOHS risk or incident, immediately notify the Bank, and resume works only upon no-objection of the Bank.	Bank's ESP	Suspension of works and notification letter sent to the Bank	Immediately and no later than 48 hours after the occurrence
16.	Prepare the root-cause analysis (RCA) of any fatal EOHS incident and implement the Corrective Action Plan (CAP).	Bank's ESP and OS1	Detailed Root Cause Analysis including CAP Submitted to the Bank	Within 7 days of the incident
17.	Disclosure of Project's E&S reports to the public	OS1, OS10, Bank's Disclosure and Access to Information Policy	Number of Reports Disclosed	During project implementation
18.	Disclosure of all outstanding Project's E&S Reports (ESIAs and RAPs)	OS1, OS10, Bank's Disclosure and Access to Information Policy	Reference/Links to the published E&S reports	Before project approval
19.	Dedicated web page on the NPCU website for disclosure of E&S documents	OS1, OS10, Bank's Disclosure and Access to Information Policy	Reference/Links to the published E&S reports	Before project approval
20.	Incorporate the requirement for the establishment of an ESMS into the ESIA/ESMP for the Agro-Industrial Hub (AIH).	OS1	ESMP Section of the ESIA for the AIH contained ESMS requirements and associated costs	Before project approval
21.	Establishment of an ESMS for the AIH as an E&S management framework during the operation of the Hub.	OS1	ESMS procedures established by the Hub Management in line with the SAPZ Project's ESMS Policy and cleared by the Bank	Before commencement of any operational activity at the AIH.