

**Federal Republic of Nigeria**  
**Nigeria Distributed Access through**  
**Renewable Energy Scale – Up Project**  
**(P179687)**

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

**Additional Financing Appraisal Stage Version**

**20/04/2026**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Nigeria (the Recipient) is implementing the Nigeria Distributed Access to Renewable Energy Scale-Up (DARES) Project (the Project) with the involvement of the Rural Electrification Agency (REA), as set out in the Original Financing Agreement and the Additional Financing for Nigeria DARES Grant Agreement (the Agreements). The International Development Association (the Association) and the International Bank for Reconstruction and Development and the Association (the Bank), acting as administrator of the Single-Donor Trust Fund to Support the Nigeria DARES Project with Forfeited Funds, have agreed to provide the original financing and additional grant for the Project, as set out in the Agreements. This ESCP supersedes previous version of the ESCP for the Project and shall apply both to the original financing and the additional grant for the Project referred to above.
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 and the Bank. 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 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, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association and the Bank. Said E&S documents may be revised from time to time with prior written agreement by the Association and the Bank. As provided for under the referred Agreements, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association, the Bank and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association, the Bank and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Bank and the Recipient's Representative specified in the Agreements. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT</b>			
A	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Maintain the Project Management Unit (PMU) with qualified staff and resources to support management of environmental, social, health and safety (E&amp;S) risks and impacts of the Project including a Social Specialist, an Environmental Specialist, Gender / GBV specialist, OHS, Grievance Management (GM) Officer to support project implementation.</p>	Maintain the PMU, and retain qualified E&S specialist, OHS, GBV / Gender, GM and communication specialist throughout Project implementation.	REA
B	<p><b>CAPACITY BUILDING PLAN/MEASURES</b></p> <p>Prepare, update and implement the capacity building plan including the following:</p> <ul style="list-style-type: none"> <li>• Training for PMU staff, stakeholders, communities, developers on Stakeholder mapping and engagement.</li> <li>• Specific aspects of environmental and social impact assessment</li> <li>• Emergency preparedness and response</li> <li>• Community health and safety.</li> <li>• ESMS</li> <li>• ESF</li> </ul>	Throughout Project implementation	REA
<b>MONITORING AND REPORTING</b>			
C	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Association/Bank regular monitoring reports on the environmental, social, health and safety (E&amp;S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> <li>• Status of preparation and implementation of E&amp;S documents required under the ESCP.</li> <li>• Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan.</li> <li>• Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them.</li> <li>• E&amp;S performance of contractors and subcontractors as reported through [monthly] contractors' and supervision firms' reports.</li> <li>• Number and status of resolution of incidents and accidents reported under action E below.</li> <li>• Screening report of mini grid sites</li> </ul>	Submit quarterly reports to the Association/Bank throughout Project implementation, commencing after the Effective Date.	REA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
D	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>Require developers and supervising firms / Independent Verification Agency (IVA) to provide monthly monitoring reports on E&amp;S performance in accordance with the metrics specified in the respective sub-grant agreement documents and contracts and submit such reports to the Association/Bank.</p>	<p>Submit the monthly report to the Association/Bank upon request OR as annexes to the reports to be submitted under action C above.</p>	<p>REA / IVA</p>
E	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the Association/Bank of any incident or accident relating 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 those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association/Bank upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association/Bank, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Notify the Association/Bank no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Association/Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association/Bank.</p>	<p>REA / IVA</p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b></p> <p>1. Update and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p>	<p>1. Update the ESMF no later than three (3) months after the effectiveness of the AF for Nigeria DARES Grant Agreement and thereafter implement the ESMF throughout Project implementation.</p>	<p>REA / Developers</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. Require all developers (including REA where relevant) to prepare and implement the site-specific Environmental and Social Management Plan (ESMP), as set out in the ESMF. The subprojects activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.	2. Prepare the ESMP and incorporate the ESMP as part of the respective sub-grant agreements with developers for the respective subproject activity prior to the carrying out of subproject activity that requires the preparation of such ESMP. Once finalized, implement the respective ESMP throughout Project implementation.	
1.2	<b>MANAGEMENT OF CONTRACTORS</b> Incorporate the relevant aspects of the ESCP, including, <i>inter alia</i> , ESMPs, the Labor Management Procedures, and code of conduct, into the E&S specifications of the procurement and sub-grant documents and contracts with contractors / developers and supervising firms / IVA. Thereafter ensure that the contractors/Developers and supervising firms/IVA comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association/Bank.	As part of the preparation of procurement / sub-grant documents and respective contracts. Supervise contractors / IVA throughout Project implementation. Copies of relevant contracts provided to the Association/Bank upon request.	REA
1.3	<b>TECHNICAL ASSISTANCE</b> Carry out the consultancies, studies (including E&S Audit), capacity building, training, and any other technical assistance activities under the Project including, <i>inter alia</i> , specific ESMPs, GMs, GBV Accountability and Response Framework in accordance with terms of reference acceptable to the Association/Bank, that are consistent with the ESSs. Thereafter prepare and finalize the output of such activities in compliance with the terms of reference.	Throughout Project implementation.	REA / Developer
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<b>LABOR MANAGEMENT PROCEDURES</b> Update and implement the Labor Management Procedures (LMP) for the Project in addition to the provision of the Nigeria Labour law.	Update the LMP not later than three (3) months after the effectiveness of the AF for Nigeria DARES Grant Agreement and thereafter implement the LMP throughout Project implementation.	REA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.2	<p><b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</b></p> <p>Prepare and implement an OHS Management Plan to assess and manage the OHS risks and impacts of the Project as part of the ESMPs.</p> <p>Require contractors/ developers and subcontractors to prepare and implement OHS Management Measures or Plan in accordance with the contractor / developers ESMP.</p>	Prepare the OHS Management Plan prior to commencement of subproject activities and thereafter implement the plan throughout Project implementation.	REA / Developers
2.3	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Establish workers grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	Developers
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE MANAGEMENT PLAN</b></p> <p>Prepare and implement a Waste Management Plan (WMP), as part of the ESMP prepared for the Project, to manage hazardous and non-hazardous waste, consistent with ESS3.</p>	Adopt the WMP prior to commencement of subproject activities and thereafter implement the WMP throughout Project implementation.	Developers / REA
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action [1.1] above.</p>	Same timeframe as for the preparation and implementation of the ESMP.	Developers / REA
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action [1.1] above.</p>	Same timeframe as for the preparation and implementation of the ESMP.	Developers / REA
4.2	<p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, including, <i>inter alia</i>, behavior of Project workers, risks of labor influx, child labor, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</p>	Same timeframe as for the preparation and implementation of the ESMPs.	Developers / REA
4.3	<p><b>SEA AND SH RISKS</b></p> <p>Update and implement a SEA/SH Action Plan to assess and manage the risks of SEA and SH.</p>	Update the SEA/SH Action Plan no later than three (3) months after the effectiveness of the AF for Nigeria DARES Grant Agreement and thereafter implement the SEA/SH Action Plan throughout Project implementation.	REA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.4	<p><b>SECURITY MANAGEMENT</b></p> <p>Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities as set out in the Security risk assessment and security management plan and reflect same in the sub-grant agreement with developers.</p>	Prior to the contractor/ developer's mobilization to site and share plan with the Association/Bank.	Developer / REA
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p><b>RESETTLEMENT FRAMEWORK</b></p> <p>1. Adopt and implement the Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.</p> <p>2. Prepare and implement a Livelihood Restoration Plan (LRP) for each activity under the Project as set out in the RPF and consistent with ESS5.</p>	<p>1. Update, adopt and implement the RPF throughout Project implementation.</p> <p>2. Prepare and implement the respective LRP prior to carrying out the relevant works, including ensuring that before taking possession of the land and related assets, full compensation has been provided and displaced people have been resettled and moving allowances have been provided.</p>	<p>REA</p> <p>REA / Developer</p>
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS</b></p> <p>Adopt and implement a Biodiversity Management Plan (BMP) as part of the ESMP consistent with ESS6.</p>	Prepare the BMP prior to commencement of Project activities and thereafter implement the BMP throughout Project implementation.	Developer / REA
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<p><b>CULTURAL HERITAGE RISKS AND IMPACTS</b></p> <p>Describe and Implement a Cultural Heritage Management Plan (CHMP) as part of the ESMP consistent with ESS8.</p>	Same as action 1.1	Developers / REA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
8.2	<p><b>CHANCE FINDS</b></p> <p>Describe and implement the chance finds procedures as part of the ESMP of the Project.</p>	Describe the chance find procedures in the ESMP and. Implement the procedures throughout Project implementation.	Developer / REA
<b>ESS 9: FINANCIAL INTERMEDIARIES</b> [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
9.1	<p><b>ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)</b></p> <p>Adopt, maintain, and implement acceptable ESMS to identify, assess, manage, and monitor the environmental and social risks and impacts of private developers' subprojects that receive support from the DARES project. The ESMS will include policies, procedures, screening, monitoring, and grievance handling along with supporting tools for undertaking E&amp;S due diligence and monitoring of developer's activities.</p>	Before selecting developers and before signing of sub-grant agreement. Once established, maintain, and implement the ESMS throughout Project implementation.	Developer / REA
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN</b></p> <p>Update and implement a Stakeholder Engagement [Framework] 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.</p>	Update the SEP no later than three (3) months after the effectiveness of the AF for Nigeria DARES Grant Agreement and thereafter implement the SEP throughout Project implementation.	REA
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>	Establish an E-grievance mechanism linked to SERVICOM E-GM portal no later than three (3) months after the effectiveness of the AF for Nigeria DARES Grant Agreement and thereafter maintain and operate the mechanism throughout Project implementation.	REA
<b>INDICATORS FOR IMPLEMENTATION READINESS</b>			
<p>The following actions are indicators for implementation readiness:</p> <p>[Indicate the actions by their numbers in the first column of the ESCP].</p> <p>Update the ESMF Update RPF</p>			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
Update the LMP Update the SEP Establish and Implement a GM system.		