ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)





Rural Access and Agricultural Marketing Project Scale-Up (RAAMP-SU)

Environmental and Social Management Framework ESMF

FINAL REPORT

JUNE 2024



RAAMP-SU

Environmental and Social Management Framework (ESMF) for the Nigeria Rural Access and Agricultural Marketing Scale-Up Project (RAAMP-SU)

EXECUTIVE SUMMARY

ES 1: Project Background

The Federal Government of Nigeria (FGN) has requested the World Bank (WB) to increase the number of states participating in the current Nigeria Rural Access and Agricultural Marketing Project (RAAMP). Presently, there are 19 pioneer participating states under RAAMP, however the next phase of the RAAMP program, which will be the Rural Access and Agricultural Marketing Project – Scale Up (RAAMP-SU) will be open to all states in Nigeria (36 states including the Federal Capital Territory (FCT). The project will be guided by the Government's Rural Travel and Transport Program (RTTP). The lead implementing agency is the Federal Department of Rural Development (FDRD) of the Federal Ministry of Agriculture and Food Security (FMAFS). The Federal Project Management Unit (FPMU) which is currently overseeing RAAMP will direct and coordinate the affairs of the RAAMP-SU on behalf of FDRD, while the state governments of the prospective states will implement the RAAMP-SU through State Project Implementation Units (SPIUs). The Project Development Objective (PDO) of RAAMP - SU is to improve rural access while strengthening the financing and institutional framework for a sustainable rural road network in prospective states. The RAAMP Scale-Up will focus on connecting rural communities to local agricultural markets such as roadside agro-logistics hubs, social amenities such as schools and hospitals, introduce innovative approach of Green Roads for Water into the project design to enhance the resilience of the project as well as promote social cohesion at rural level.

The Scale-up has been designed to have four (4) components as detailed in chapter two of this report, these include:

- Component A: Improvement of Improvement of Resilient Rural Access
 The component comprises three subcomponents:
 Sub-Component A.1: Climate-Informed Rural Roads Rehabilitation/Upgrade
 Sub-Component A.2: Technical support for Rural Roads rehabilitation/upgrade
 Subcomponent A.3: Social inclusion and promotion of gender equality
- Component B: Climate Resilient Asset Management
 This component comprises of two sub-components:
 Sub-Component B.1: Asset Management Improvement and Resilience Scale Up.
 Sub-Component B.2: Development and implementation of a climate risk informed road asset
 management system
- Component C: Institutional Strengthening and Project Management
 The component comprises of two sub-components:
 Sub-Component C.1: Project Management
 Sub-Component C.2: Institutional Strengthening and sector reforms.
- Component D: Contingent Emergency Response

The proposed RAAMP Scale Up shall be a nationwide project which is open to all 36 states of the country and the Federal Capital Territory (FCT) to participate in the project provided they meet the selection requirements.

ES 2: Rationale for the RAAMP-SU ESMF

The overall environmental and social risks of the project are Moderate. Eight out of the ten Environmental and Social Standards: ESS1 (Assessment and Management of Environmental and Social Risks and Impacts), ESS2 (Labor and Working Conditions), ESS3 (Resource Efficiency and Pollution Prevention and Management), ESS4 (Community Health and Safety), ESS5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement), ESS6 (Biodiversity Conservation and Sustainable Management of Living Natural Resources), ESS8 (Cultural Heritage), and ESS10 (Stakeholder Engagement and Information Disclosure) are relevant to the RAAMP-SU.

Environmental and Social Management Framework (ESMF) for the Nigeria Rural Access and Agricultural Marketing Scale-Up Project (RAAMP-SU)

Under the Parent Project (RAAMP), an ESMF was prepared in line with the World Bank Operational Policies. The rational for preparing this ESMF is to update the existing ESMF in line with the requirements of the World Bank Environmental and Social Framework (ESF), and to assist FDRD in examining the environmental and social risks and impacts of the RAAMP-SU. It guides the FDRD to assess potential environmental and social risks and impacts of the SU's interventions when subprojects' locations cannot be determined during project preparation. It sets out the principles, rules, guidelines, and procedures to assess the potential environmental and social (E&S) risks and impacts. It provides adequate information on the area in which subprojects are expected to be sited, including any potential E&S vulnerabilities of the area; and on the potential impacts that may occur and mitigation measures that might be expected to be used.

ES 3: Objectives of the ESMF

The overall objective of this ESMF is to revise/update and adopt the existing ESMF to guide E&S management under the RAAMP-SU. The updated framework will provide guidelines for assessing the environmental, socioeconomic, and health risks and impacts of the project as well as recommending appropriate generic mitigation measures and monitoring plans in line with the relevant Environmental and Social Standards (ESS).

ES 4: Legal and Administrative Frameworks

Several laws and regulations apply to the RAAMP-SU to promote environmental and social sustainability of the project. The regulatory power for all environmental matters is vested in the Federal Ministry of Environment (FMEnv), which is charged with the responsibility of ensuring that all developmental projects are carried out in compliance with relevant environmental laws and regulations including relevant International Laws and Conventions. This ESMF has been prepared in line with relevant Nigeria Laws including the Environmental Impact Assessment (EIA) Act CAP E12 LFN 2004 and the National Policy on the Environment, 1989 (Revised 2016), Nigeria Labor Law (2004), Child right Act (2003), National Gender Policy (2006), Nigerian Land Use Act of 1978, World Bank Environmental and Social Framework and the World Bank Group Environmental Health and Safety Guidelines amongst others as detailed in chapter 3 of this report.

ES 5: Environmental and Social Baseline Conditions

Nigeria, situated in West Africa along the Gulf of Guinea, spans 923,768km², with a coastline of 853km. It shares borders with Benin, Cameroon, Chad, and Niger, boasting a territorial sea of 12 nautical miles and an exclusive economic zone of 200 nautical miles. The nation is administratively divided into 36 states and the Federal Capital Territory. The 36 states are further sub-divided into 774 LGAs. The states are further aggregated into six geopolitical zones: North-West, North-East, North-Central, South-East, South-South, and South-West geopolitical zones. The environmental and social baseline conditions of the project area is summarized in the table below.

Environmental	Baseline (Physical and Biological)
Topography	Nigeria has five major geographic regions. A low coastal zone along the Gulf of Guinea; hills and low plateaus north of the coastal zone; the Niger–Benue River valley; a broad stepped plateau stretching to the northern border with elevations exceeding 1,200 m; and a mountainous zone along the eastern border, which includes the country's highest point, Chappal Waddi (2,419 meters). Source: Geography of Nigeria (2022)
Hydrology & Surface Water: There are many rivers in Nigeria but the two principal river systems are the Niger – Be Hydrogeology Chad. The Niger River, the largest in West Africa, flows 4,000 km from Guinea through Mali, Niger, Benin, before emptying into the Gulf of Guinea. The Benue River and largest tributary flows 1,400 km from Ca Nigeria, where it empties into the Niger River. The country's other river system involves various rivers that the Yobe River, which then flows along the border with Niger and empties into Lake Chad.	
	Groundwater: The major aquifers in Nigeria are Basement aquifers, Sedimentary basins, Volcanic plateau, and River alluvium. There are eight major regional aquifer systems, 30 local and minor aquifers and 36 aquicludes, aquitards, and aquifuges in Nigeria. Generally, groundwater in most of the aquifers in Nigeria are fresh with low concentrations of total dissolved solids (<500 mg L-1). However, groundwater is exposed to active pollution in major cities and rural communities due to increased urbanization, indiscriminate waste disposals, industrial activities etc. Source: Nigeria Hydrological Services Agency (2018)
Geology	Nigeria's land mass is made up of two main rocks, Precambrian basement rocks which covers about two-thirds of the country's landmass and Sedimentary rocks of Cretaceous about half of the country. Other minor formations are the Tertiary Volcanics, Tertiary sediments etc. The Precambrian basement rocks consisting of gneisses, migmatites, schist, and various metamorphic rocks and granites Source: Nigeria Geological Survey Agency (NGSA)

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Environmental Baseline (Physical and Biological)		
Climate	The project area of influence (which cuts across Nigeria) is divided into three main climatic regions: Tropical Rain Forest Region, Near Desert Region, and Savannah Region. However, due to unequal elevations in different parts of the country, there are differences in temperature and rainfall distribution. The tropical rainforest region covering the southern part of the country, has an annual rainfall of around 2,000 mm (80 inches), the near desert region covering the far north of the country with an annual rainfall around 500 mm (20 inches) and the savannah region covering the central portion of the country has annual rains around 1,000 mm (40 inches). The climate in Nigeria is semi-arid in the north, and humid in the south. Source: World Bank Climate Change Knowledge Portal	
	Climate Impacts and Vulnerability of Project Prospective States Climate impacts and vulnerability vary across the RAAMP-SU Prospective States and the FCT. States within the same or similar ecological zone share broadly the same climate impacts and vulnerabilities. Flooding is a dominant climate impact in the North-Central states of Benue, Kogi, Kwara, Nasarawa, FCT, and Niger. Niger State also experiences drought, and this can be linked to its proximity to the northwest. The main impact of climate change in the North (North East and North West) is desertification, land degradation, and drought. For the south (South East, South West and South South), the major types of climate change impacts are flooding, gully and coastal erosions which have led to loss of arable land. It is important to point out that for the entire country, temperature changes are constant climate change impacts. This has resulted from an increase in global warming, and of course irregular rainfall patterns. Source: Climate Impacts, Policies and Actions at the Sub-national Level in Nigeria (2023) – Department of Climate Change; Federal Ministry of Environment (FMEnv)	
Soil	Soil types in Nigeria vary according to their composition, physical, chemical, morphological and mineralogical characteristics. These vary from Sandy Clay, Sandy Loam, Clay Loam in the North West and North East geopolitical zones (with some Concretionary Clay in the North East); mostly Sandy Clay in the North Central geopolitical zone with few patches of Clay Loam and Sandy Loam. In the South West, the soil type is largely Sandy Loam and Clay Loam. In the South West of Clay Loam and Clay Loam. In the South Sandy Loam together with Sandy Loam and Clay Loam. In the South East, the soil type is mostly Sandy Clay and traces of Sandy Loam. Source: Nigeria Institute of Soil Science	
Vegetation	Savannah and Forest are the predominant types of vegetation in Nigeria. The savannah vegetation stretches from the central parts of Nigeria to the extreme northern parts. It is divided into: i) Sahel savannah: in the North-Eastern borders, ii) Short grass Sudan savannah: stretching from upper western borders to the North-Western borders and, iii) Woodland/Tall grass Guinea Savannah (lying below the short grass savannah and covering the central states and parts of the eastern region of the country). The tropical forest vegetation covers the remaining southern portion of the country and is divided into three types: i) Rain Forest with tall trees, ii) Fresh water swamp consisting of both fresh and saltwater swamps and iii) Mangrove Forest which is made up of mangrove vegetation. Source Nigeria Conservation Foundation (NCF)	
Biodiversity & Nature Protection.	Nigeria ranks 36th in the world of countries with the highest biodiversity. It is widely believed that the areas surrounding Calabar in Cross River State contain the world's largest diversity of butterflies. The drill monkey is only found in the wild in Southeast Nigeria. The total number of higher plant species in Nigeria is 4,715 (of which 119 are threatened). For mammals, the total number of species is 274, and for breeding birds the total known species is 286. According to the International Union for Conservation of Nature (IUCN) Red List, Nigeria has a total of 23 critically endangered, 42 endangered and 104 vulnerable animal species. Those classified as critically endangered in Nigeria include the Niger Delta red colobus (<i>Piliocolobus epieni</i>), Cross River gorilla (<i>Gorilla gorilla diehli</i>), Gambles's relic (<i>Pentaphlebia gamblesi</i>), Gambles's flatwing (<i>Neurolestes nigeriensis</i>) and Perret's toad (<i>Sclerophrys perreti</i>). Nigeria has 1,001 protected areas (nature reserves, wilderness areas, national parks), covering a total 5.5 million ha. The total land area under protection represents 6% of the total land area. Under categories I and II (the highest level of protection) Nigeria has 2.5 million ha. Sources: International Union for Conservation of Nature (IUCN); Protected Plant	

Social Baseline	
Population &	Nigeria is the most populous country in Africa and the 6th most populous country in the world. Nigeria has the 16th
Demographics	highest percentage population under 18 Years of age in the world (50.4 % of the population). Nigeria's population is
	estimated to be 223,804,632. This is based on the annual exponential population growth rate of 2.41%. Sources:
	National Boundary Commission (NBC); National Population Commission (NPC)
Gender Based	In Nigeria, there are currently 39,109 reported cases, with 1,849 fatal cases, 27,228 closed cases, 11,881 open
Violence	cases, and 571 Convicted Perpetrators (March, 2024). Currently, there are 893 GBV service providers across all
	states in Nigeria recognized by the Federal Ministry of Women Affairs. Importantly, besides interpersonal and sexual
	violence, child marriage and Female Genital Mutilation are the other culturally harmful practices prevalent across
	Nigeria. Conflict in the North East has further contributed a steep rise in targeted violence against women and children
	by Boko Haram increasingly for abduction and violence. Remarkably, in Nigeria, Donor-funded projects are
	encouraging the inclusion of practices, assessments and activities that factor in GBV risks assessment and mapping
	of GBV services as well as preparation of GBV action plans to aid safe implementation of their programs/projects
	especially where influx of labour and other factors may increase SEA/SH/GBV risks. Source: Federal Ministry of
	Women Affairs – National Gender Based Violence Dashboard
Land Use	The estimated land area of Nigeria is 923,768 km ² . Land use varies based on location and the needs of the
Pattern,	community. In 2021, Nigeria had an arable land area of roughly 36.9 million hectares. In addition, 6.6 million hectares
Agricultural	were under permanent crops, while 25.2 million hectares were under permanent meadows and pastures. Agriculture

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Social Baseline		
Production	is a key activity for Nigeria's economy after oil. Major produce in the north are cereals (such as millet, millet), rice,	
and	maize, beans, soya beans and vegetables. Irish potato, yam, potato is the main agricultural produce in the middle	
Livelihoods	belt while cassava, cash crops such as cocoa, coffee, cola nuts and cashew nuts are grown in the south-western	
	Nigeria, also, red oil production and cassava are exceptionally produced at the south-eastern region. Sources:	
	https://www.statista.com	
Employment,	Estimate from the Nigerian Bureau of statistics (NBS) indicates that unemployment rate in Nigeria surged to 5% in	
Economy and	the third quarter of 2023 from 4.2% in the previous quarter, while youth unemployment stands at 8.6%. The Nigerian	
Poverty	economy rests on two pillars: oil/gas and agriculture. Both sectors contribute 65% - 70% of GDP, while the secondary	
	sector (manufacturing contributes about 7% and the tertiary sector (transport, trade, housing etc.) contributes about	
	25%. Source: Nigeria Bureau of Statistics (NBS)	
Water Supply	Poor access to improved water and sanitation in Nigeria remains a major contributing factor to high morbidity and	
and Sanitary	mortality rates among children under 5 years (UNICEF). The use of contaminated drinking water and poor sanitary	
Conditions	conditions result in increased vulnerability to water-borne diseases, including diarrhoea which leads to deaths of more	
	than 70,000 children under 5 years annually (UNICEF). 73% of the diarrhoeal and enteric disease burden is	
	associated with poor access to adequate water, sanitation and hygiene, and is disproportionately borne by poorer	
	children. Source: United Nations International Children's Emergency Fund UNICEF	

ES 6: Identified Environmental and Social Risks and Impacts

The positive impacts associated with the RAAMP-SU Implementation include:

- Intervention works will help reduce the risk of erosion and flooding in communities within the corridor of selected sites as a result of proper drainage and culvert construction.
- Rural roads rehabilitation will improve the transportation of agricultural products and commodities to markets, reducing post-harvest losses therefore promoting more efficient and sustainable farming practices.
- Institutional Strengthening Supporting state Ministries, Departments and Agencies (MDAs), CBOs, NGOs, and Development Partners, etc. in provision of technical assistance guidance and monitoring of road rehabilitation activities undertaken in the project areas, and other parts of the state.
- Encourage direct and indirect investments in the agricultural and rural development sector.
- Improve access to social services including schools, religious areas, healthcare facilities etc.
- Rehabilitation of rural roads will improve transportation infrastructure, making it easier for the locals to commute.
- The proposed intervention works will positively impact women by providing them with easier access to
 markets, education, and healthcare (where available). This can contribute to women's empowerment and
 participation in economic and social activities. Additionally, women and children who have to walk across
 the narrow rugged rural roads to fetch water and wash clothes will have better and safer access to water
 points due to the intervention works.
- Increase in employment and economic activity is expected to occur during sub-projects implementation.

The adverse E&S risks and impacts associated with Components A & B and the corresponding mitigation measures are presented in the table below. E&S impacts and mitigation measures for pre-rehabilitation and operation phases are included in the report (Chapter 5 and 6)

Rehabilitation/Construction Phase		Mitigation Measures
Environmental Risks	Environmental Impacts	
Air Pollution	 Air Pollution from fugitive dusts and carbon emissions from exhaust fumes during civil works and operation of work vehicles and equipment, respectively 	Measures should be targeted at dampening or watering the road surface using water trucks or sprinkler systems, distributing Personal Protective Equipment (PPEs) such as nose masks or respirators to workers/community members, and reducing emissions by retrofitting with emission controls for vehicles and ensuring that vehicles are serviced regularly. Maintain a speed limit of 40km/hr. on earth-based roads (dirt roads).
Soil Pollution	Soil Pollution: Leakages from construction wastes such as disused oil (fuel, lubricants), cement, and paint may occur	Measures should be targeted at storing of hazardous materials such as oil, fuel, lubricants, cement, and paint in designated containers.

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Re	habilitation/Const	ruction Phase	Mitigation Measures
			Liaise with the appropriate waste management agency for the proper evacuation and disposal of hazardous waste materials. Use of drip pans. Management of maintenance workshops or onsite maintenance.
•	Noise level increases	 Noise level increase during civil works and operation of work vehicles and equipment. 	Early notification of community members on work schedule. Provide project workers, community members (e.g. students, roadside traders, farmers, etc.) with PPEs such as earplugs or earmuffs and Implement noise control measures during construction, such as mufflers or silencers on machinery and fulfils the requirements of ESS 2 As much as possible, avoid work during late evenings or night hours (between 6:00pm to 6:00am).
•	Energy wastage	 Energy wastage due to inefficient or unnecessary consumption of energy resources e.g., diesel, electricity 	Measures should be targeted at ensuring resource efficiency and alternating operations to reduce energy losses
•	Generation of Construction and Demolition (CD) wastes	 Significant amounts of wastes will be generated onsite. These wastes may include debris, top soil, disused materials and containers, food wastes etc. 	Measures should be embedded in sub-project level Waste Management Plans (WMPs). Measures should focus on source reduction, sorting, collection, reusing, recycling, transporting, containment, treatment final disposal etc. Fulfils the requirements of ESS 3 Measures should include plans which address waste collection at source. Fulfils the requirements of ESS 3
•	Surface water contamination	 Possible pollution of surface water via oil/lubricant spills from machinery, batteries acid etc. Construction of river crossings may result in sediment runoffs in nearby streams/rivers 	Measures should be targeted at implementing spill prevention and containment.
•	Impacts on Natural Habitats	 Possible disruption of local habitats and wildlife during excavation 	Mitigation measures should be targeted at conducting thorough habitat surveys prior to excavation activities to identify sensitive areas and wildlife habitats. Establish buffer zones around sensitive habitats to prevent direct disturbance. Furthermore, these zones should be marked clearly to restrict access to them during road rehabilitation. For excavations around borrow pits, ensure that all open pits are reclaimed to the normal topography of the land, the reclamation should be followed by reafforestation/ replanting with native vegetation.

Rehat	bilitation/Const	ruction Phase	Mitigation Measures
Socia	Social Risks Social Impacts		
•	Noise level increases	 Residents of communities may experience unusual noise specifically, from civil works and use of heavy machineries. 	Mitigation measures should be targeted at utilizing scheduling movement options to reduce or minimize the impacts of noise disturbances around residential areas/locations.
• (Grievances, Complaints, Disruption of	 Grievances from community locals as a result of relocation of structures within the ROW Negative impact on host community dynamics as an outcome 	Implement Grievance Redress Mechanism (GRM) at the level of the sub-project
	Activities and Vandalism	 from labour influx a. Impact on existing infrastructures which may be accidentally damaged or destroyed during the movement of heavy-duty vehicles and equipment 	Early and continuous Stakeholder Engagement is mandatory and fulfils the requirements of ESS 10 Implement a Resettlement Action Plan (RAP) or Abbreviated Resettlement Action Plan (ARAP)
• (Grievance and Conflicts	Grievances may arise due to activities around sacred sites	Implement Physical Cultural Resources Management Plan and or a Chance Find Procedure
•	Risk of violent or non-violent conflicts	 Conflicts of interests may arise during decision making at the project implementation level; between Contract workers and general labour, etc. 	Implement GRM at the level of the sub-project/ intervention works.
		G , (, (, (), (Stakeholder Engagement
			Mitigation measures should be implemented through provisions in the Contractors Environmental and Social Management Plan (CESMP).

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		Stakeholder Engagement, Sensitization and capacity building for all cadre of workers should be conducted.
Risk of Illicit Behaviour and Crime	 Theft, physical assaults and substance abuse attributable to labour influx. Additionally, there may be increase in unprotected sexual intercourse due to labour influx thereby increasing the risks of Sexually Transmitted Diseases (STDs) and Sexually Transmitted Infections (STIs). 	Implement Labour Management Procedure (LMP) Awareness and training and Enforcement of the CoC cadres.
Risk of social conflicts	 Labour influx may lead to: Risk of social conflicts between local community and the construction workers 	Implement LMP; training and enforcement of the CoC cadres
 Risk of illicit behaviour 	 Risk of illicit behaviour and practices e.g., substance abuse which may also be on the increase following the influx of migrant contractor workers across project locations. 	Conduct Security Risk Assessment (SRA) prior to commencement of civil works and implement SMP during the project life cycle. Contractors should include
Security risks and threats	 Contracted workers such as Contractors may be exposed to security threats such as vandalization and destruction of their assets and possibly kidnapping. 	their own security measures and plans in the CESMP
SEA/SH and VAC (GBV)	 Women and girls may be exposed to Sexual Harassment (SH)/Sexual Exploitation and Abuse (SEA) as a result of interactions with workers and possibly followers. 	Gender Based Violence (GBV) risk assessment and mapping of GBV services; Align with Project GBV mitigation Plan
		Sensitization campaigns and awareness against SEA/SH/GBV
Child Safety	Children may be exposed to various forms of violence from workers.	Enforcement of all Cadres of CoCs etc
 Exposure to accidents 	 Unreclaimed and abandoned borrow pits may pose safety risks for children and other persons in communities. Likely accidents while pedestrians are crossing access roads. 	Applications of suitable measures that fulfil the requirements of ESS 4 e.g., Community Health and Safety Plan
		Preparation of Borrow Pit Management and Reclamation Plan
		Preparation of Traffic Management Plan (TMP)
 Security risks and threats 	 Communities already exposed to security risks and threats may experience heightened security threats due to ongoing intervention works. E.g., kidnapping. Similarly, communities void of security risks and threats may suffer such when sub- projects commence. 	Mitigation measures should be targeted at conducting SRA prior to commencement of civil works and implement Security Management Plan (SMP) during the project life cycle
 Restricted access along project locations 	 Road users may suffer restricted access to selected roads when intervention works are ongoing 	Early notification and sensitization of community members (e.g. students, roadside traders, farmers, etc.)
 Physical and Economic Displacement 	 Implementation of civil works may result to reclamation of the Right-of-Way (ROW) and impact on livelihoods. 	Implement RAP or ARAP
Occupational Risks	Occupational Impacts	
OHS Risks	Most activities could predispose personnel to hazards. "Unsafe behaviours" and "Unsafe conditions" will pose a serious Occupational Health and Safety (OHS) risk.	Measures should apply the "Hierarchy of Controls" according to OHS principles – Elimination, Substitutions, Engineering Controls, Administrative Controls and PPEs.

ES 7: Guidance on Environmental and Social Assessment

In fulfilment of the requirements of the Nigeria EIA Act CAP E12. LFN 2004 and ESS 1, the RAAMP-SU will prepare environmental and social assessments for subprojects/intervention works envisaged to have potential adverse environmental and social risks and impacts. The assessment to be carried out should be proportionate to the potential risks and impacts of the intervention works, and will assess, in an integrated way, all relevant direct, indirect and cumulative environmental and social risks and impacts associated with **Component A**; **Sub-Component A.1** (Rehabilitation/Upgrade of about 3,000 km of rural roads, repairing, and strengthening of old bridges and culverts, slope stabilization, erosion protection improvements, surface repairs or

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resurfacing and other engineering solutions, and Component B; Sub-Component B.1 (Civil works relating to maintenance of 3,500 km of rural roads).

Environmental and Social Screening - Similar to the ESF, the Environmental Assessment Department of the Federal Ministry of Environment mandates that a review of all proposed investment projects or sub-projects be undertaken through a process called an initial environmental examination (Screening). The purpose of the screening is to categorize projects or sub-projects based on propensity/likelihood to result in potential adverse environmental and social risks and impacts, and identify the level of environmental assessment required. In this regard, screening for sub-projects/intervention works under the RAAMP-SU shall be in accordance with the Nigeria EIA Procedures (2021), and the requirements of ESS 1. The Screening will be undertaken primarily by the RAAMP-SU SPIUs under the guidance of the FPMU. The significant environmental and social risks and impacts/areas of concern shall be captured in the Environmental Screening and Scoping Report, and a Terms of Reference (ToR) shall be prepared for the E&S Assessment for the proposed intervention work(s).

ES 8: Institutional Arrangements for Implementation of the RAAMP-SU ESMF

The institutional arrangements, Roles and Responsibilities for the RAAMP-SU Implementation is presented belowS/NOrganizationsESMF Roles and Responsibilities

Gove	ernmental Organizations	
1.	Federal Ministry of Environment (FMEnv)	The FMEnv shall provide the guidelines and procedures required for in-country disclosure of the ESMF and subsequent E&S assessments to be prepared at the state levels through its EA Department. Currently, the EA department has provided supporting staff to the RAAMP-SU FPMU who in addition help bring the integration of the country's E&S framework (where and when necessary) in RAAMP-SU implementation. The FMEnv will also aid the RAAMP-SU FPMU in coordinating with its departments and agencies on monitoring responsibilities as regards this ESMF and other program instruments where required. Currently, the FPMU has environmental officers seconded from the FMEnv to support the project, and this structure will be adopted for the RAAMP-SU.
2.	Federal Ministry of Agricultural and Food Security (FMAFS)	The FMAFS is the implementing ministry and shall coordinate and liaise directly with the FDRD on ESMF implementation matters. In addition, it will speed up coordination activities (where required) with other federal ministries involved in ESMF implementation so as to facilitate information sharing, strategizing, and shall report ESMF and overall RAAMP-SU implementation to the Federal Executive Council (FEC).
3.	Federal Department of Rural Development (FDRD)	The FDRD is the department overseeing the affairs of the RAAMP-SU on behalf of the FMAFS. The Federal Project Steering Committee is domiciled in this department and will support project decisions at the ministerial level.
4.	Federal Ministry of Labour and Employment (FMLE)	The FMLE is the federal ministry concerned with relations between workers and employers. It will exercise responsibility in ESMF implementation by ensuring implementation activities especially those involving workers are consistent with the provision of the National Policy on Labour (1999), the RAAMP-SU LMP and support the safeguards unit of the FPMU in assuring the requirements of ESS 2 are in keeping throughout project implementation. The FMLE will as well support labour and OHS compliance at the state levels through its 36 labour offices including the labour office in the FCT. The Department for OHS of the ministry will act principally on the ministry's behalf.
5.	Federal Ministry of Women Affairs (FMWA)	The FMWA was created consequent upon the response to The United Nations agreement to establish Institutional Mechanisms for advancing Women and Women matters. Specifically, the FMWA through its Department for Women and Gender Affairs will support ESMF implementation through mainstreaming its women and gender affairs approach with the GBV action plan for RAAMP-SU and the Bank's Good Practice Note - Addressing SEA/SH in Human Development Operations. Currently, the FMWA has seconded an officer to support the RAAMP FPMU.
6.	State Ministry of Women Affairs (SMWA)	Depending on their mandate they shall assist ESMF implementation on gender issues and in the mapping of GBV services. Additionally, partner with the SPIUs in sensitization and awareness campaigns and grassroots programs/initiatives targeted at women inclusion and development. Currently, many of the SPIUs have gender officers seconded from the SMWA to support the project, this model will be adopted for the RAAMP-SU states.
7.	Federal Project Management Unit (FPMU)	Serve as the central coordinating body for the implementation of the ESMF across all RAAMP- SU states. Develop and disseminate guidance materials, templates, and training programs to support SPIUs in implementing the requirements of the ESSs relevant to RAAMP-SU. Monitor and evaluate the performance of SPIUs in complying with environmental and social standards and requirements. Facilitate knowledge sharing and exchange of best practices among SPIUs to enhance

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S/N	Organizations	ESMF Roles and Responsibilities
		Management Dian (CMD) ato
8.	State Project Implementation Units (SPIUs)	Implement the ESMF at the state level, ensuring that the requirements of the relevant ESSs are integrated into all RAAMP-SU subprojects. Conduct environmental and social assessments and prepare necessary E&S instruments, such as Environmental and Social Management Plans (ESMPs) and Resettlement Action Plans (RAPs) etc. Provide training and capacity building to SPIU staff and stakeholders on the ESF, the relevant ESSs to RAAMP-SU, E&S compliance requirements, etc. Establish and maintain Grievance Redress Mechanisms including SEA/SH GRM, to address community concerns related to environmental and social risks and impacts of subproject activities. States shall also conduct SRA and implement their SMPs as part of ESMF implementation.
9.	Safeguards Units	Safeguards units in the FPMU and SPIUs consist of environmental, social and GBV officers and shall take lead in assuring that sub-projects/intervention works designed and implemented by RAAMP-SU are in keeping with the requirements of the ESSs. They shall ensure that E&S assessments prepared by Consultants' meet the Banks's requirements and play a role in liaisons with the SMEnvs/FMEnv in registering sub-projects/intervention works and seeing to their disclosure. Importantly, SPIUs shall conduct E&S assessments; which shall be reviewed by the FPMU Safeguards Unit and cleared by the Bank. All Safeguard responsibilities summarised in numbers 7&8 of this Table shall be driven by the Safeguards Unit.
10.	National Emergency Management Agency (NEMA)/States Emergency Management Agency (SEMAs)	NEMA shall provide supportive coordinating responsibilities to the FDRD/FPMU in the event of emergencies and natural disasters; while the State Emergency Management Agency (SEMA) shall provide same at state levels. NEMA shall collaborate with RAAMP-SU in aligning its approaches in the National Disaster Management Framework with the requirements of ESS 4 (WB Guidance Notes on Community Health and Safety - Emergency Preparedness and Response), where applicable. NEMA and the SEMAs will support ESMF implementation through Emergency Preparedness and Response approaches.
11.	States Ministry of Environment (SMEnvs)	The SMEnvs shall exercise the power of the FMEnv at the level of the states such that in ESMF implementation they will provide the E&S policy framework to guide RAAMP-SU civil works implementation. In addition, SMEnvs shall participate in project consultations, disclosure of cleared E&S instruments and monitoring of ESMF implementation at the state levels.
12.	State Environmental Protection Agencies/State Waste Management Agencies (SEPAs/SWMAs)	The SEPAs shall enforce environmental regulatory compliance at the state levels respectively. Statutorily, they are mainly responsible for ensuring the overall protection of various aspects of the built, physical and biological environment by ensuring limits set by the FMEnv are not exceeded during development works. The SEPAs may be directly involved in waste management activities, however, in some states the responsibility for waste management is handled by the SWMAs. Generally, at the state level, the SWMAs undertake the task of providing guidelines for enforcing proper waste management procedures. In some instances, the SWMAs may have designated dumpsites for specific types of waste and guide the process for waste conveyance to the dumpsites by waste generators or procure the services of licensed waste collection vendors to carry out the services of waste collection, treatment and final disposal. SPIUs shall leverage on the relationships with SWMAs to assure that environmentally sound and sociably accountable management of waste is a primary requirement during the implementation of civil works.
13.	Rural Access Road Agencies (RARAs)	The state RARAs will be very effective in the operation phase of the implementation of this ESMF by carrying out road maintenance across the RAAMP-SU states.
14.	Other Interested Parties	Stakeholder identification for technical support MDAs shall be a continuous process in the implementation of the ESMF as well as during the preparation of requisite E&S instruments. In this regard, other interested parties may be identified and found to be relevant for ESMF implementation as further stakeholder engagement continues either at the federal or state levels. Such parties based on their statutory mandate shall be assigned appropriate responsibilities depending on their relevance to aspects of ESMF implementation i.e. Physical Cultural Resources, Biodiversity etc.
Non-	Governmental Organizatio	ons
1	Consultants	Consultant(s) will be procured by the FPMU and SPIUs to undertake the preparation of required E&S instruments; and/or other requisite reports (if needed). They will liaise with the E&S Technical Assistance (TAs) Consultants and E&S Officers of the FPMU and SPIUs respectively. Consultants may also be required to conduct capacity building on ESMF implementation and/or implementation of management plans described in E&S instruments.
2	Contractors	Contractors shall abide by all environmental and social clauses established in the bidding documents and contract agreements. They shall sign and implement the Code of Conduct and comply to their mitigation responsibilities for E&S risks and impacts as provided in the E&S assessments (e.g. ESMPs) including their respective CESMPs. In order to enable successful

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S/N	Organizations	ESMF Roles and Responsibilities
		Contractors shall include E&S and GBV focal persons as part of their work force and an OHS/Community, Health, Safety, Environment and Security officer or manager. Additionally, Contractors shall comply to the LMP provisions to drive ESMF implementation.
3	Supervisory Consultants	Supervisory Consultants shall be responsible to monitor, keep in check, ensure quality assurance and optimal delivery of the Contractors contract. Their E&S responsibilities will require monitoring mitigation measures ascribed to Contractors, review of the CESMP, verification of signed CoCs etc. They shall also form parts of the actors required to implement and monitor some of the management plans captured in this ESMF. Similar to Contractors, Supervisory Consultants shall include E&S and GBV focal persons as part of their work force; as well as an OHS/Community, Health, Safety, Environment and Security officer or manager.
4	Civil Society Organizations (CSOs), Non- Governmental Organizations (NGOs), Community Based Organizations (CBOs) and Other Interested Parties.	At national level and sub-national levels when properly engaged by the project (through stakeholder engagements and consultations), CSOs, NGOs and CBOs could drive sensitization and awareness programs on rural development, labour influx, community health and safety, SEA/SHGBV, etc.
5	The World Bank	The World Bank has overall responsibility to ensure that its ESF and ESSs are complied with. In addition, the Bank will be responsible for the final review and clearance of ESMF; as well as the giving of a "no objection" to the Terms of Reference for E&S instruments (ESMPs, ESIAs, GAP, RPF, RAPs, LMPs, SRAs, SMPs, etc.).

ES 9: Stakeholder Engagement

Consultations for the ESMF involved a combination of virtual meetings and physical consultations, taking into account the "Public Consultations and Stakeholder Engagement in WB-supported Operations when there are Constraints on Conducting Public Meetings" (such as insecurities in some of the states). The consultations were held from 20th March – 2nd April, 2024. The consultation and public engagement process for developing the ESMF included stakeholders such as the Federal Project Management Unit (FPMU), State Project Implementation Units (SPIUs), Rural Access and Road Agencies (RARAs), Federal and State-Level Implementing MDAs (Federal Ministry of Environment/State Ministry of Environment (FMEnv/SMEnv), Federal Ministry of Labour and Employment (FMLE), State Ministries of Land, State Ministries of Work, State Ministries of Women Affairs, State Environmental Protection Agencies/State Waste Management Agencies (SEPA/SWMA), State Emergency Management Agencies (SEMA)), both at the existing and new states, Local Communities, and Road Users. A summary of key concerns, suggestions discussions is provided below:

- FMEnv Updates on relevant regulatory frameworks were shared. The Deputy Director of the Department of Environmental Assessment confirmed changes in Nigeria's EIA procedures and charges as of 2021. Notably, adjustments were made to charges for screening, scoping, and registration of environmental social assessment as contained in the EIA Procedures and Charges Regulation 2021.
- SPIUs Consultations were held with the SPIUs of the RAAMP-SU Prospective States (where available) and it was observed that most of the states already have a functional SPIU under RAAMP and the SPIUs have acquired various levels of competencies for management of environmental, social and GBV risks, however, some SPIUs are yet to set up project offices and procure office equipment.
- RARAs Consultations with the SPIUs further revealed that while some states (Adamawa, Akwa Ibom, Bauchi, Ekiti, Jigawa, Kaduna, Kano, Kebbi, Kogi, Niger, Ogun, Ondo, Oyo, and Plateau states) have passed the bill to establish RARA, they are still awaiting their inauguration. In states where the RARAs have not been established, there are variations in their structure and function, with some states having separate agencies like the Road Maintenance Agency (Anambra) and Road Traffic Agency (Kano). The agencies have been established to take ownership of road rehabilitation projects in the states.
- NEMA The consultation with NEMA revealed that while there are standard procedures for accidents and emergency management, there is no specific protocol tailored to the road construction sector. However, they expressed their optimism for the RAAMP-SU and informed of their readiness to support its successful implementation. Furthermore, they solicited that the RAAMP-SU maintain an open channel of communication and continuously engage them whenever they require their services.

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- SEPAs/SWMAs The consultation with SMWAs revealed that, while there are waste management frameworks in place in all states, these frameworks do not adequately cover waste management in rural communities. Each state has its waste management agency, with varying practices such as incineration and landfill use.
- State Ministries of Works Stated that the objectives and components of RAAMP-SU align with some of
 their functions and voiced their willingness to partake in the implementation of the project. Some states have
 Area Engineers who represent the ministry at the local level. These engineers specialize in rural roads and
 have extensive knowledge of their respective LGAs, particularly roads that are in poor condition and near
 major farms. Utilizing their expertise, they could play a valuable role in the road selection process by offering
 insights on roads that are very important to local communities. The ministry representatives emphasized the
 need for continuous engagement and inclusion of their ministry in all phases of RAAMP-SU.
- Communities Stakeholders have raised concerns about their exclusion from the decision-making process
 regarding the selection of sub-projects or intervention works within their communities during past projects. This
 absence of involvement has led to the development of rural road infrastructure that fails to address the specific
 needs of certain communities, especially when compared to other roads. Additionally, community members
 have noted that access roads leading to project sites, such as those for culvert and bridge installations, are
 often in poor condition and inaccessible. Despite this, these access roads are overlooked and not given priority
 for rehabilitation.

Refer to Chapter 9 for more details on Stakeholder Consultation.

ES 12: ESMF Cost Estimate

The total estimated cost for the ESMF implementation and monitoring for all project locations is estimated at One Million, Six Hundred and Eleven Thousand, One Hundred and Seventy-One Dollars, Sixty Cents Only (USD 1,611,171.60). This is equivalent to One Billion, Eight Hundred and Thirteen Million, Eight-Three Thousand and Three Hundred Naira Only (1,813,083,300.00 NGN).