



**AFRICAN DEVELOPMENT
BANK GROUP**

ENVIRONMENTAL AND SOCIAL SYSTEM ASSESSMENT (ESSA)

SECOND PHASE OF SUPPORT TO NATIONAL AGRICULTURAL GROWTH SCHEME – AGRO- POCKET (NAGS 2.0) | P-NG-AA0-042

FEDERAL REPUBLIC OF NIGERIA

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ABBREVIATIONS

AfDB	:	African Development Bank
ATASP-1	:	Agriculture Transformation Agenda Support Project – Phase 1
AEFPF	:	African Emergency Food Production Facility
BTOR		Back to Office Report
CBN	:	Central Bank of Nigeria
CME	:	Coordinating Minister of the Economy
COVID-19	:	Coronavirus
DLI		Disbursement Linked Indicator
E&S	:	Environmental and Social
ERGP	:	Economic Recovery and Growth Plan
FADC		Food & Agribusiness Development Consult
FA ESMP		Financial Agreement Environmental and Social Management Plan
FDAE	:	Federal Department of Agriculture Extension
FEPSAN	:	Fertilizer Producers and Suppliers Association of Nigeria
FGN	:	Federal Government of Nigeria
FISS	:	Farm Input Support Service
FMAFS	:	Federal Ministry of Agriculture and Food Security
FMF	:	Federal Ministry of Finance
GDP	:	Gross Domestic Product
GRM		Grievance Redress Mechanism
IERD	:	International Economic Relations Department
ISS		Integrated Safeguards System
LCRI	:	Lake Chad Research Institute
NAERLS	:	National Agricultural Extension and Research Liaison Services
NAFDAC		National Agency for Food and Drug Administration and Control
NAGS-AP	:	National Agriculture Growth Scheme – Agro Pocket
NATIP	:	National Agricultural Technology and Innovation Policy
NCRI	:	National Cereals Research Institute
NDP	:	National Development Plan
NESREA		National Environmental Standards and Regulations Enforcement Agency
NGN	:	Nigerian Naira
NFQC	:	National Fertilizer Quality Control
NFQCR	:	National Fertilizer Quality Control Regulations
NRCRI	:	National Root Crops Research Institute
RBF	:	Results Based Financing
SEAH		Sexual Exploitation Abuse and Harassment
SEEDAN	:	Seed Entrepreneur Association of Nigeria
TAAT	:	Technologies for African Agricultural Transformation
TWC	:	Technical Working Committee
YEIB		Youth Entrepreneurship Investment Bank

EXECUTIVE SUMMARY

Building on the commendable outcomes of the Support for National Agro-pocket Scheme Phase 1, the Federal Government of Nigeria approached the African Development Bank to provide a follow-on financing for the Phase 2 to deepen support for Nigeria's agricultural business value chain. The uniqueness of this transaction is premised on leveraging existing systems and capacity to achieve the targeted outcomes across five results areas and on the use of an innovative financing instrument (RBF) to strengthen the country's operational and safeguarding systems. The five results areas include:

Results Area 1: Increased Production and Productivity of Selected Staple Crops

- *The objective of this results area is to deploy enablers that will systematically contribute to the quantity of key staple foods produced in Nigeria by small holder as well as medium to large scale farmers through effective dissemination of scientifically proven technology packages and ICT innovations. The two key outputs of this result areas are: (i) Farmers' access to quality inputs improved using the Agro-Pocket ICT Portal; and (ii) ICT based agri-tech and fintech innovations developed for production and productivity improvement services.*

Results Area 2: Strengthened Local Agricultural Seed Production System

- *The objective of this area is to strengthen production and delivery of quality, high yielding climate resilient nutrition rich varieties of selected staple crops. The outputs for this results area are: (i) Certified high productivity and climate resilient nutrient-dense seeds produced locally; and (ii) Seed certification mechanism strengthened.*

Results Area 3: Key staple food value chains are more resilient to climate change shocks

- *The objective of this results area is to ensure that farmers respond appropriately to early warnings and receive effective extension services and insurance to minimize losses caused by adverse climate change occurrences. It will also promote clean energy options such as solar pumps for irrigation. The outputs for this results area are: (i) Farmers are more resilient to climate change through adapting efficient technologies and practices and guided response to early warning information; and (ii) Extension services strengthened delivered closer to the beneficiaries using public and private extension services providers.*

Results Area 4: Strengthened private sector activities in selected key staple food value chains

- *The objective of this area of results is to crowd in private sector investment in the production of staple foods and other agricultural products and services. The outputs for this results area are: (i) Acceleration in transition of micro and small-scale staple crops farms (up to 2 ha) to medium to large scale farms/commercial farms (beyond 5 ha); (ii) Promotion/Strengthening of youth-led and women led private initiatives such as conversion of crop residue / other bye products to feed for animals; delivery of private extension; etc.; and (iii) Private sector partners e.g. Flour Millers Association of Nigeria mobilized and linked to farmers. The operation will provide incentives in the form of inputs to farmers who expand their production area.*

Results Area 5: Improved Governance and Monitoring of Agri Food Sector

- *The objective of this results area is to support, modernise and harmonize gender-responsive agri-food governance and monitoring and evaluation systems to improve real time information for policy formulation and planning. The output areas for this include: (i) ICT technologies are in place to improve governance of the Agri Food Sector; and (ii) Agri-Foods decision making capacity is strengthened.*

Rationale for ESSA Preparation. In line with the AfDB's RBF Policy, the country's environmental and social systems are adopted for mainstreaming of safeguards requirements in programme implementation. Accordingly, it was imperative that the national environmental and social system is assessed against the Bank's ISS requirements, which often has more stringent provisions for ensuring adherence to international best practices in programme implementation. The scope of activities undertaken during the Environmental and Social System Assessment exercise consists of:

- (i) identification of the Program's environmental, health, safety, and social risks;
- (ii) assessment of the legal and policy framework for environmental and social management, including a review of relevant legislation, rules, procedures, and institutional responsibilities that are to be adopted by the Program;
- (iii) assessment of the implementing institutional capacity and performance to manage potential adverse environmental and social issues; and
- (iv) proffering recommendation of specific actions to address gaps in the Program's environmental and social management system, and in the policy and legal framework and implementation capacity.

Program Environmental and Social Categorization. With reference to the national categorization framework, all agricultural and rural development projects and programs are classified as Category II except where the project site is in close proximity to Environmental Sensitive Areas (Coral reefs, Mangrove swamps, Small islands, tropical rainforest, Areas with erosions prone soils, Areas prone to desertification (and semi-arid zones), Natural conservation areas, Areas which harbour protected or endangered species, Areas of unique scientific interest, Areas of historic or archeological interest or culture and Heritage sites).

Based on the review of planned activities, the Program was classified as Category 2 in line with Bank's Integrated Safeguards System (ISS), according to the categorization memorandum approved on 16th October 2024. Thus, all investments likely to be classified as high E&S risk (Category 1), according to the Bank's ISS, are not eligible under this program. The justification for the E&S categorization has been based on the nature, scale, sensitivity, and location of the proposed project interventions. Program activities such as supply and installation of pumps for irrigation (small scale solar-powered, compressed natural gas (CNG)-powered pumps etc.) and utilization of soil/crop specific fertilizer blends and agrochemicals have the likelihood to generate limited, site-specific, and reversible E&S impacts.

Program Climate Risk Review and Categorization. Preliminary screening under the Bank's Climate Safeguards System has classified this Program as a Category 2 operation. This reflects its moderate vulnerability to climate risks—such as intensifying drought conditions in the northern states and increased

precipitation along with sea level rise in the southern and coastal areas. Moreover, the high incidence of poverty and the heavy reliance of vulnerable populations on agriculture and natural resources further exacerbate the impacts of climate change on crop yields, farmer incomes, livelihoods, nutrition, and overall food security. However, technologies exist to reduce the impacts of climate change while increasing productivity and building resilience among vulnerable communities in Nigeria. These actions will contribute to climate change mitigation and the creation of green jobs in rural areas, whilst addressing the needs of vulnerable groups, youth and women and enhancing gender equality, improved nutrition, social equity and inclusive development.

Program Gender Assessment and Categorization. This project is Category 2 according to the Bank Gender Marker System, as a women empowerment perspective will be applied across components and actions towards the reduction of gender gaps in outcomes. Considering the National Gender Policy in Agriculture and the National Gender Policy of the Federal Government the project will include targets in jobs creation, skills development and procurement for women enterprises in the results framework. A Gender Action Plan will be developed to guide the work on women advancement and the reduction of gender gaps. Amongst others there will be a women empowerment strategy for the reduction of gender gaps in results area, a target of parity (30%) in the training of new seed inspectors and young entrepreneurs, affirmative action for women cooperatives and gender diverse cooperatives and a gender responsive governance for the agri-food sector. T

Assessment of Nigeria's Environmental and Social System. Nigeria has established a fairly robust architecture for mainstreaming environmental, social, climate and gender considerations in (agricultural) projects. However, despite the rich structural, institutional and legal frameworks, the effectiveness and efficiency of policy instruments, law enforcement and governing institutions remain subpar due to limited technological, technical, financial, and institutional capacity and resources. The inevitable consequence of this asymmetry in Policies and Praxis is evident in less impressive results recorded by programmes that were supposed to achieve wide-ranging transformational effects. In recent years, a number of initiatives have been implemented to address these challenges, and some modest outcomes have been realised; still, there is ample opportunity to further strengthen the country's system in order to fully align with the Bank's ISS requirements.

Assessment of E&S Capacity Program Implementing Entity. Based on the experience from the National Agricultural Growth Scheme's Phase 1, the Project Implementing Unit (PIU) demonstrated limited E&S capacity; therefore, it is crucial to ascertain the state-level safeguards implementation capacity to ensure adequate mainstreaming of environmental, social, social, social, gender and climate lens in the delivery programme. The Action Plan

Assessment of Reputational Risk to the Bank. The Borrower, the Executing Agency and Program Implementing Entity are well acquainted with the Bank's E&S requirements and will utilise lessons learned from previous and ongoing programs to improve E&S performance at the institutional and project-/program levels. Overall, the assessment of reputational risks to the Bank is rated from Medium to Low across different risk indicators discussed in Section 7.

Environmental and Social Safeguards System Strengthening Action Plan. The ESSA has established guidelines on actions to drive sound environmental and social management practices within the Program at the national and subnational levels. It provides a useful framework to inform decision-making by the relevant authorities in the Borrower's country and supports the Bank's internal review and decision process associated with the Program. Given that the core objective of the ESSA is the strengthening of national environmental and social system, institutional capacity building with a budget of not less than 200,000UA has been incorporated into the Program E&S Action Plan. By developing capacity of institutions at the national and subnational level, the implementation of Program activities across the 36 States and the FCT will comply with not only national legislation and guidelines but also the Bank's ISS requirements.

The Bank worked closely with the Borrower in preparing the ESSA; however, the findings, conclusions, and opinions expressed in the documents are those of the AfDB. The recommended actions derived from this assessment have been extensively discussed and agreed upon with the Borrower and will be incorporated into the Financing Agreement Environmental and Social Management Plan (FA ESMP).

The African Development Bank will work closely with the Borrower during project implementation to ensure that the Program Action Plan are duly executed in a manner that does not occasion any reputational risks and that further strengthens the country's national environmental and social system. Adhering to international best practices not only supports the country's aspirations to achieve food security but also protects its human and social capital which are critical levers for sustained economic productivity and socio-ecological resilience.

1. INTRODUCTION

Nigeria is a developing economy with diverse ecological settings covering a land area of 923,770 km². Nigeria is not only the most populous country in Africa, but it also has the fourth highest Gross Domestic Product (GDP) as at the end of 2024¹, and has rich natural resources including oil and gas, solid minerals, and precious metals. Agriculture employs many Nigerians, but significant challenges impact productivity. Agriculture employs 38% of the labour and contributes 25.2% of GDP. Low agriculture sector productivity is attributed to poor access to quality inputs (seeds and fertilizer), poor land tenure systems, low levels of irrigation farming, climate change, land degradation, and weak industrial value chains. Insurgency, armed banditry and perennial crop farmer-herder conflicts further affect agricultural development. These factors, combined with an overvalued Naira, have choked agriculture output and increased food imports.

The increase in the costs of food, fertilizer and fuel has led to more Nigerians slipping into food and nutrition insecurity. According to the Cadre Harmonise Analysis Report published in November 2024; staple food prices rose to averages above 75%, impacting negatively on households' capacity to maintain acceptable dietary intake and Food Consumption (FC) outcomes. Seventy percent of the Households are in phase 2 or 3 (between Stress and Crisis levels) in Food Consumption Score, Household Dietary Diversity Score and Household Hunger Scale. During the upcoming 2025 lean season the numbers of persons in the Critical Phases of Food and Nutrition Insecurity may increase by 32.2% to reach 33,159,535 representing 16% of the overall analysed populations, and a 25.3% increase from the estimated 26,459,666 projected for same period of 2024; indicating worsening Food and Nutrition Insecurity (FNI) situation in the country.

In recent times, the country has experienced more pronounced adverse effects of Climate Change in its agri-systems including widespread floods in years 2022 and 2024 and prolonged dry-spells in major staple foods growing areas in 2024, which has influenced harvested areas and crop productivity: In 2022, assessments of the floods indicated that in 15 of the most flood-affected states, about 768 000 hectares of farmland were destroyed. Faced with similar situation in year 2012, the Federal Government of Nigeria used the lessons learned to build resilience into agricultural planning by developing dry season rice farming for the first time in Nigeria. The need to optimize land use by multiple cropping on the same fields using irrigation in Nigeria is further necessitated by insecurity challenges that hampers expansion of agricultural activities in some areas of the country leading to localized production shortfalls. Nigeria's rapidly growing population will exert pressure on demand for food. The country's population is projected to increase to 402 million by 2050 from current 234 million people, making Nigeria the third most populous country globally.

However, food production potential in Nigeria is high with Agriculture contributing to 25.2% of the GDP and Nigeria's agricultural land area estimated at 69 million hectares (75% of the total land area) of which 34 million hectares are arable. This land comprises of rich agro-ecological zones that support production of most commodities consumed in the country. Most of Nigeria's rural population, which represents 48% of the national population) are smallholder farmers cultivating less than 2 hectares of land. These constitute about 70% of total farming population and produce up to 90% of national output. Inadequate support to this group has confined them to traditional farming methods, reflected in low productivity and limited opportunities for value addition.

To address these issues and exploit its agricultural potential, the Federal Government of Nigeria prioritized structural transformation and policy reforms that sought to promote diversification and ensure food security. To do this, the Federal Ministry of Agriculture and Food Security (FMAFS) adopted the National Agricultural Technology and Innovation Policy -2022 – 2027 (NATIP). The Policy considers a mix of short-term and medium-term multi-stakeholder approaches towards ensuring resilience, recovery and growth and, at the same

1 <https://www.statista.com/statistics/1120999/gdp-of-african-countries-by-country/>

time, achieving a shift from subsistence farming to modern agriculture capable of ensuring national food security and contributing significantly to the national economic diversification drive and creating at least 12 million jobs.

In line with NATIP, Nigeria has presented its Food and Agriculture Delivery Compact (FADC), at the High-Level Summit on Food Sovereignty and Resilience in January 2023 organized in Dakar by the Bank and the AU. The Compact for Nigeria targets an additional yearly production of 3.2 million tons of wheat, 2.5 million tons of rice, 2.0 million tons of maize, 36 million tons of cassava, 2.4 million tons of sorghum and one billion litres of milk by 2027. To achieve this, average yields of 8 mt/Ha for rice and 6 mt/Ha for wheat are expected with support from the Technologies for Africa Agriculture Transformation (TAAT) Program which promotes the supply and adoption of most suitable high yield, climate-resilient and nutrition-rich varieties seed.

The operation was strategically designed to extend the implementation of key policy thrusts for the Agricultural sector in Nigeria. This includes the Food and Agriculture Delivery Compact which was presented by the country at the Feed Africa II Summit held in Dakar in January 2023; the National Wheat Self Sufficiency Strategy (2023-32) which was developed with assistance from the Bank and National Seed Policy (2023). The finalization of the wheat strategy and seed policy were both policy actions of the NAGS-AP sector Budget Support Operations. It is also aligned to the Priority Area III of the National Rice Development Strategy II (2020-30) which emphasizes Improvement in Seed Development and Other Production Inputs. The proposed operation will also support the enforcement the National Fertilizer Quality Control Act; and National Fertilizer Quality Control Regulations (NFQCR) that safeguards the interest of farmers against nutrient deficiencies, adulteration, misleading claims and short weight; as well as the interest of the fertilizer companies.

The proposed operation is therefore aligned with national and continental priorities as it targets implementing the intervention areas and commodities prioritized in the NATIP and FADC. It directly responds to the country's development issues in the area of food sovereignty as well as reduction of food importation through expansion of production major food commodities that are imported such as wheat.

Rationale for the Bank's Engagement and Evaluation of Country's Environmental and Social System

The proposed project is backed by The Bank's Feed Africa Strategy for Agriculture Transformation in Africa (2016 – 2025) with the objective of reducing the then US\$ 35 bn food imports. The fulfilment of the strategy relies on the creation of three simultaneous conditions. These include: (i) A large-scale dissemination of agriculture productivity-increasing technologies and inputs; (ii) Development of input and output market structures and incentives that allow the full realization of the value of increased production; and (iii) A well-functioning and vibrant private sector to sustain the gains from modern agricultural practices. A gender mainstreaming and women and youth economic empowerment approach across agriculture value chain is central to this strategy.

The Bank has continuously supported the Agricultural Sector of the country with its financial and knowledge products. Its current agriculture sector portfolio totals \$899 million in loans and grants is being used to finance infrastructure development for production and value addition, agribusiness development and building resilience to environmental and climate change effects. The ongoing operations are: i) Support to National Agricultural Growth Scheme Agro-Pocket (\$134 million); ii) Special Agro-Industrial Processing Zone Programme – Phase 1 Project (\$538 million including co-financing); iii) Agricultural Transformation Agenda Support Project -Phase 1 (\$142 million); iv) Plateau State – Potato Value Chain Support Project (\$11 million); v) Programme for Integrated Development and Adaptation to Climate Change in the Niger Basin Nigeria Project(\$23 million) – ; vi) Yobe State Environmental and Climate Change Action Project (\$50 million); and vii) Humanitarian and

Food Security Response to Effect of Floods (\$1 million).

The proposed operation will utilize production infrastructure installed by ATASP-1 including the 10,000 Ha of irrigable land developed and the production areas which have been opened through the construction of all-weather roads and bridges. It will also prepare farmers for production of some of the feedstock that will be processed in the Agriculture Transformation Centres and Agro-Industrial Hubs of the SAPZs. In addition, the RBF will provide opportunities for Youth to promote their agri-businesses through accessing financing from the Youth Entrepreneurship Investment Bank (YEIB). YEIB aims at promoting private sector-led inclusive economic development, by creating entrepreneurship opportunities for the youth. It will also opportune AgriTech promotion through linkages to Investment in Digital and Creative Enterprise Project which is promoting economic growth and job creation in Nigeria by supporting the development of digital and creative industries.

When the African Development Bank provides financial support using the results-based financing (RBF) mechanism in support of objectives agreed with the Bank, the Bank conducts an environmental and social (E&S) system assessment of the programme/project, in collaboration with the Borrower. The Bank's approach focuses on the Borrower's country frameworks (often termed country systems²), benchmarking relevant Borrower agencies against the objectives and outcomes of the Bank's Operational Safeguards (OSs) to ensure that they have the competency and resources to carry out RBF activities in a manner consistent with these objectives and outcomes. The Environmental and Social System Assessment (ESSA) report details the evaluation of the Borrower's country systems and is consulted on by stakeholders and disclosed by the Bank and the Borrower prior to appraisal phase.

This report describes the programme and the associated environmental and social risks and also presents an assessment of the program's environmental and social system. Furthermore, it provides an evaluation of the program's implementing entity's capacity and performance and recommends an action plan for strengthening environmental and social safeguards system. An overview of the Bank's exposure to potential reputational risk is examined with a view to identifying applicable mitigants. Finally, the report presents a monitoring and implementation plan which includes metrics for measuring and monitoring the program's E&S system performance.

² A country's 'Environmental and Social Safeguard System' refers to the country's own policies, procedures, and institutional mechanisms for applying safeguards. Core environmental management functions of public agencies include policy and law formulation, integration of E&S policies, greening of development policies, the establishment of E&S standards, compliance and quality assurance, support to public and private entities on E&S management, and application of decision-making procedures for mainstreaming climate change into development interventions.

2. PURPOSE AND OBJECTIVES OF ENVIRONMENTAL AND SOCIAL SYSTEM ASSESSMENT

2.1. Overview of Environmental and Social System Assessment (ESSA)

The Bank Group's Policy on Results-based Financing (RBF) presents the rationale for adopting RBF instruments to support a Regional Member Country's development program. Specifically, the Bank leverages RBF instruments to advance sustainable development agenda by improving the capacity of counties and agencies to effectively manage climate, environment and social considerations. The Bank's ISS serves as the benchmark for determining the equivalence and acceptability of the country's environmental and social system and informs the approach for safeguards assessment and improvement at the national and subnational levels. A key guiding principle of the proposed RBF instrument is its pivotal focus on identifying and strengthening the institutional capacity needed for an RBF-supported program to achieve its desired results including positive results with respect to the management of climate, environment and social (CES) risks.

2.2. National Environmental and Social System

A country's 'Environmental and Social Safeguard System' refers to the country's own policies, procedures, and institutional mechanisms for applying safeguards. Specifically, the national Environmental and Social System is considered as being all the components of the policy/strategy, legislation, and regulations of the country, both national and local which the borrower uses as the basis focuses to regulate, evaluate and manage the environmental and social risks and impacts that arise from the implementation of investments in its jurisdiction

The National E&S System has three (3) interlinked and interdependent components comprising the following:

Component 1:

Relevant aspects of national, regional and **local legislations and regulations**

Component 2:

Institutions for regulation, monitoring, and implementation of laws and regulations

Component 3:

resources and capacities at the level of institutions, agencies and other structures involved in carrying out environmental and social assessments (ESAs),
implementation, supervision, monitoring and enforcements of environmental and social aspects connected to the investment projects concerned

Typically, the core environmental management functions of public agencies include policy and law formulation, integration of E&S policies, greening of development policies, the establishment of E&S standards, compliance and quality assurance, support to public and private entities on E&S management, and application of decision-making procedures for mainstreaming climate change into development interventions.

2.3. ESSA Methodology

The ESSA methodology is focused on understanding and assessing the program activities, benefits and risks associated with various activities, environmental and social conditions, and the existing institutional mechanism at various levels for implementation, management, policies, and regulatory aspects against the provisions of the Bank's ISS. The overarching objective of the approach is to identify and analyse key process and institutional strengths and gaps with a view to recommending an action plan to not only address the gaps but also to ensure achievement of anticipated sustainable environmental and social outcomes under the Program using extant effective systems.

The ESSA was prepared through a combination of reviews of existing program materials (especially the Draft Nigeria Environmental and Social Country System Assessment) available technical literature, interviews and consultations with government staff and other stakeholders and partners. The assessments were carried out through a comprehensive review of relevant government (national and state) policies, legislation, institutional roles and capacities, program procedures, and assessment of the available capacity across the 36 States and Federal Capital Territory.

The main tasks consist of the following:

Task 1: Screening and Scoping of Environmental and Social Risks of the Proposed RBF Program Activities:

The Bank's team conducted a comprehensive review of program documents and other available details to understand the ongoing program and the extent and nature of various activities involved. A thorough understanding of the scope of program activities provides a basis for determining the suitability of the program for RBF instrument. Specifically, it helped in ascertaining that no activities with the potential for significant and irreversible adverse impacts is included in the program planned activities and that the program activities do not fall within the Bank's Exclusion List.

Task 2: Review of National and Subnational Policy, Regulatory and Institutional Framework

The Bank conducted a comprehensive literature review of existing policies, regulations, standards at the National, State, Local level applicable to overall environmental and social management and various program activities. It should be noted that the review process involved a streamlined approach by contextualising the exercise based on the program's sector, while also addressing the broader context of the country's environmental and social system. The exercise covered the review of project documents, previous ESSA documentation from World Bank-funded projects in Nigeria, and back-to-office (BToR) reports of supervision missions of previous and ongoing AfDB projects and programs in the sector. The Bank also reviewed the existing policy/Environmental and Social Management Frameworks (EMFs) of other national projects for understanding the frameworks used to manage environmental aspects in similar programs. The Bank's ISS was used as a benchmark for assessing the robustness and adequacy of the country's environmental and social

system. The benchmarking exercise was based on a comparative analysis between the requirements of each Operational Safeguards (Borrower Requirements) & requirements of National requirements (policies, legislation, regulation, norms & standards)

Task 3: Assessment of Environmental and Social Risks of the Program

The Program description captures sufficient details about the benefits of the planned activities, including increase in productivity and resilience of food production system, enhanced livelihoods for women and youths, deepened capacity for driving climate-smart agriculture. The Bank assessed the risks associated with the program implementation across the 36 States and the Federal Capital Territory which straddle different ecological zones with varying socio-ecological features.

Task 4: Assessment of Institutional Capacities and Constraints:

The analysis also featured evaluation of E&S governance systems and institutional relationships to identify the roles, responsibilities, and structure of the relevant institutions responsible for implementing the program, including coordination between different entities at the National and Subnational levels. Furthermore, the review examined the management of environmental and social aspects in an existing program and previous Bank-support projects, mainly through risk avoidance, reduction, mitigation, and management and enhancing the benefits during project design, implementation, and Monitoring and Evaluation (M&E) stages. As part of the review, a gap assessment was undertaken to ascertain the suitability and sufficiency of current mechanisms for managing environmental and social risks and enhancing programs' benefits. The scope of evaluation also covered gap analysis in terms of monitoring & enforcement capacity and practices, including aspects relating to staffing and resource supply, availability and adequacy of guidance documents, frameworks and relevant digital tools, and co-ordination mechanisms between agencies to manage the environmental and social aspects of the Program across its lifecycle.

Task 5: Joint Consultation Meetings (IERD, NAGS-AP Secretariat, Mission Team) with Key Stakeholders:

In collaboration with the Borrower, the Bank's Team held physical and virtual joint consultation sessions with key stakeholders on the 05 February 2025 and 06 February 2025 to discuss the opportunities and challenges in implementing the Program activities leveraging lessons learnt from previous and ongoing projects. The key stakeholder group engaged during the Preparation Mission include:

Sectoral Stakeholders	i.	Seed System: NASC, SEEDAN
	ii.	Fertilizer and other Agro-Chemicals (Blenders & Agro-Dealers)
	iii.	ICT Service Providers, National Identification Authority
	iv.	Farmer Associations (AFAN, WFAN, RIFAN, others)
	v.	Aggregators & Processors (FMN, AFEX,
	vi.	6) Others
Development Partners		IFAD, FAO, JICA, USAID, Gates Foundation, World Bank Group, others
Others		Research & Academia

Task 6: Disclosure of ESSA by the Bank and the Borrower

Disclosure of the draft ESSA was carried out on X May 2025, through a hybrid validation workshop involving National and Subnational levels participants, invitations were sent out to all the relevant State Ministries and department representatives and other relevant stakeholders such as non-governmental organizations (NGOs) and development partners to give comments on the draft ESSA report. In line with the Bank's Policy on Disclosure and Access to Information, the final ESSA incorporating comments from stakeholders shall be disclosed on the Borrower's website before the appraisal of the program. The Bank will also disclose the ESSA report on the AfDB website.

3. PROGRAM DESCRIPTION & ENVIRONMENTAL AND SOCIAL RISKS

3.1. PROGRAM DESCRIPTION

The Federal Government of Nigeria unveiled its eight-point Agenda to facilitate sustainable development of the country. These are: (i) Reform the economy to deliver sustained inclusive growth; (ii) Strengthen national security for peace and prosperity; (iii) Boost Agriculture to achieve food security; (iv) Unlock energy and natural resources for sustainable development; (v) Enhance infrastructure and transportation as enablers of growth; (vi) Focus on education, health and social investment as essential pillars of development; (vii) Accelerate diversification through industrialization, digitization, creative arts, manufacturing and innovation; and (viii) improve governance for effective service delivery.

In line with the foregoing, the Federal Ministry of Agriculture and Food Security (FMAFS) is facilitating the implementation of the following Ministerial Deliverables signed with the President of Nigeria for the period 2023 to 2027. The deliverables include; (i) Work with States and Local Governments, and private sector to open up land to boost production (farming) of key foods based on their competitive /comparative advantages; (ii) Work with States and Local Governments and private sector to boost processing of key staple foods based on their comparative advantages; and (iii) Eliminate government bottle-neck to rapid commercialization of improved varieties and breeds of food crops and animals among others.

Based on these, an interlinked ministerial priority action for immediate, short, medium and long terms has been developed by FMAFS. Immediate priority actions included implementation of the dry season wheat production starting from November 2023 as part of National Agriculture Growth Scheme – Agro Pocket (NAGS-AP) program. The NAGS-AP program is designed to catalyze government's efforts at increasing the supply of locally produced food with the intended effect of reducing food inflation and building resilience to external shocks in international food supply chains. Strategic priority areas of interest to the Program are: (i) Seed

production and distribution systems; (ii) Quality fertilizer (and other agro chemicals) manufacturing and distribution systems; and (iii) inclusion, gender equality and women advancement. The Program is intentional in efforts at wheat and cereals production due to the magnitude of the effect of the multiple shocks on these commodities and its attendant burden on Nigeria's foreign exchange, vis-a-vis the untapped opportunities to produce them in Nigeria currently. The Program is financed through the national budget to engender budgetary support for inputs and agricultural extension services while supporting NAGS to crowd - in investments for and facilitate other needful enablers such as mechanization, irrigation, storage and others.

The short-, medium- and long-term priority actions aligned to the operation include:

- (i) Reform the National Research System to serve as the engine of growth for innovative solutions to strategic value chains, increase productivity (yields) of the country's food security and export crops, livestock and fisheries;
- (ii) Prepare a Joint Action Plan with the Federal Ministry of Water Resources to unlock the huge irrigation potential of the River Basin Development Authority and other flood plains in the country to guarantee all year-round food production;
- (iii) Identify all available vacant farmlands in various Federal Government Institutions to bring them into food production to enhance food security indices;
- (iv) Institutionalize and consolidate Nigerian Food Systems dashboard for informed quality planning, policy decision and information dissemination on the state of food and nutrition in the country;
- (v) Development of digital /ICT Mobile-based Agro-Industry System and E-extension platforms to support farmers through establishment of the national centres in the 6 agro-ecological zones of Nigeria while the command-and-control office will be in Abuja;
- (vi) Develop comprehensive soil fertility mapping and soil information system for food security; and
- (vii) Use Fintech solutions, wallets shall be created for all financial disbursement to deliver directly to the targeted end users.

Eight Hundred and Twenty-Seven Billion Naira (NGN827 Billion) which is approximately \$590 million of the Federal Government of Nigeria's NGN49.7 trillion is allocated to the agricultural sector. The Federal Budget will be used to finance sector activities including the Food Security Crops Value Chain Development Programs (ERGP1208771) and Development of digital mobile based extension and advisory systems to support farmers' productivity (ERGP30208769). The operation will partially support these budget lines.

The project aims to reinforce Nigeria's food security by strengthening the value chains of four key staple crops (wheat, rice, maize, and cassava) while promoting social inclusion, gender equality, and resilience to climate change. The project will deploy proven technology packages and ICT innovations to improve farmers' access to quality inputs and enhance productivity. It will strengthen local agricultural seed production systems, ensuring the availability of high-yielding, climate-resilient nutrition dense crop variety seeds. The project will also enhance farmers' resilience to climate change through adaptation technologies, early warning systems, crop insurance and promote use of solar pumps. Private sector investment will be encouraged to support agricultural activities and optimize financial gains from crop residues. Governance and monitoring systems will be modernized with ICT platforms to improve real-time information for policy formulation and planning. By focusing on gender-responsive strategies, youth engagement, and conflict sensitivity, the project aims to create a more inclusive, resilient, and productive agricultural sector in Nigeria, contributing to national food security, economic diversification, and social cohesion.

3.1.1. Results Areas

Based on the lessons from the implementation of the NAGS-AP operation and emerging agri-food systems challenges in Nigeria, the proposed RBF Programme will have five reinforcing Results Area described as follows:

Results Area 1: Increased Production and Productivity of Selected Staple Crops

The objective of this results area is to deploy enablers that will systematically contribute to the quantity of key staple foods produced in Nigeria by small holder as well as medium to large scale farmers through effective dissemination of scientifically proven technology packages and ICT innovations. The two key outputs of this result areas are: *(i) Farmers' access to quality inputs improved using the Agro-Pocket ICT Portal; and (ii) ICT based agri-tech and fintech innovations developed for production and productivity improvement services.* These will include improved extension, mechanization, financial and appropriate soil moisture and nutrient control services delivery. Considering women unequal situation in agriculture and access to land and resources, and the Ministry of agriculture National Gender Strategy, this will be carried out with a gender perspective towards the reduction of gender gaps.

Results Area 2: Strengthened Local Agricultural Seed Production System

The objective of this area is to strengthen production and delivery of quality, high yielding climate resilient nutrition rich varieties of selected staple crops. The outputs for this results area are: *(i) Certified high productivity and climate resilient nutrient-dense seeds produced locally; and (ii) Seed certification mechanism strengthened.* Through the operation, the mandated National Agriculture Research Institutes (NARI) - such as National Cereals Research Institute (NCRI) for rice; Lake Chad Research Institute (LCRI) for wheat; Institute for Agricultural Research (IAR) for maize and National Root Crops Research Institute (NRCRI) for Cassava– will be supported to ensure availability of foundation seeds for certified seed production by private seed companies. The National Agriculture Seed Council (NASC) will be strengthened to effectively certify local seeds that have been produced and issue CODEX for effective monitoring, using its in-house capacity and private seed certification as considered in the National Seed Policy for Nigeria 2023. A gender responsive system will be implemented towards the reduction of gender gaps in this area.

Results Area 3: Key staple food value chains are more resilient to climate change shocks

The objective of this results area is to ensure that farmers respond appropriately to early warnings and receive effective extension services and insurance to minimize losses caused by adverse climate change occurrences. It will also promote clean energy options such as solar pumps for irrigation. The outputs for this results area are: *(i) Farmers are more resilient to climate change through adapting efficient technologies and practices and guided response to early warning information; and (ii) Extension services strengthened delivered closer to the beneficiaries using public and private extension services providers.* Gender across these value chains, and in insurance initiatives, will be considered to reduce gender gaps. NAGS-AP will coordinate with the National Hydrological Services Agency (NIHSA) and Nigerian Meteorological Agency (NiMeT) to provide farmers with early warning information on potential flooding and draught situations and offer guidance to minimize crop losses. It will also support farmers to undertake crop insurance in accordance with the National Agriculture Crop Insurance policy and deliver climate change related extension services through public institutions and private sector experts.

Results Area 4: Strengthened private sector activities in selected key staple food value chains

The objective of this area of results is to crowd in private sector investment in the production of staple foods and other agricultural products and services. The outputs for this results area are: (i) *Acceleration in transition of micro and small-scale staple crops farms (up to 2 ha) to medium to large scale farms/commercial farms (beyond 5 ha);* (ii) *Promotion/Strengthening of youth-led and women led private initiatives such as conversion of crop residue / other by products to feed for animals; delivery of private extension; etc.; and* (iii) *Private sector partners e.g. Flour Millers Association of Nigeria mobilized and linked to farmers.* The operation will provide incentives in the form of inputs to farmers who expand their production area. It will also identify and support initiatives that optimize financial gains from crop residues, and catalyze private sector participation in extension services, seed certification services and others e.g. food fortification of wheat and maize products.

Results Area 5: Improved Governance and Monitoring of Agri Food Sector

The objective of this results area is to support, modernise and harmonize gender-responsive agri-food governance and monitoring and evaluation systems to improve real time information for policy formulation and planning. The output areas for this include: (i) *ICT technologies are in place to improve governance of the Agri Food Sector;* and (ii) *Agri-Foods decision making capacity is strengthened.* Specifically, the operation will support the Department of Policy Planning of FMAFS, IERD of the FMF and the CME's office with tools and training for informed and accurate monitoring and evaluation of the agri-food systems to inform policy, programmes and project design & formulation; and respective monitoring & evaluation.

3.1.2. Program Beneficiaries

The stakeholders for the operation will include all value chain actors in the production and marketing of key staples crops in Nigeria. They will include mandated research institutions such as LCRI, NCRI, IAR and NRCRI where various productivity enhancing technologies are generated including the production of breeder seed; technology dissemination institutions such as Federal Department of Agriculture; Federal Department of Agriculture Extension; Farm Input Support Services Department; Federal Department of Policy Planning; and the National Agriculture Seed Council and relevant departments in state level ministries responsible for Agriculture. They will also include actors in the seed production and fertilizer manufacturing chain, notably seed companies; fertilizer manufacturers, blenders and agro-input dealers; and ICT service providers. Others will include farmers and farmer-based organizations, aggregators, warehouse operators, primary and secondary processors (both large and small scale).

The Program will support the FGN policy of providing enhanced access to quality and affordable agricultural inputs to staple crop farmers. Specifically, the Program will provide improved climate adapted agricultural production technologies, including certified seeds of heat tolerant wheat, drought tolerant and nutrient-dense maize, high yielding rice and soybean varieties, mineral fertilizer and other agro-chemicals, as well as advisory/extension services for 560,000 wheat farmers for the 2025/6 dry season wheat farming; 2,800,000 wheat, rice, maize and cassava farmers in year 2026 wet and dry seasons; 2,960,000 in year 2027; 3,120,000 in year 2028; 3,280,000 in year 2029 and 3,600,000 in year 2030. Each farmer will be supported with inputs twice; the first support will be up to 50% by the project and the second 25%; following which the farmer will graduate from the operation. In addition, some 500 medium to large scale farmers who have land holdings of 10Ha and above will be specially supported with inputs as change agents. Twenty thousand farmers will also be given

solar powered water pumps.

3.1.3. Programme Financing

In 2025, the total budgetary allocation to the agricultural sector is about \$590 million; which when maintained computes to \$2.95 billion in the ensuing 5 years. The operation will assist the government in executing its budget for Food Security Crops Value Chain Development Programs (ERGP1208771); Development of digital mobile based extension and advisory systems to support farmers' productivity (ERGP30208769); Intensive Dry and Wet Season Rice Production in various zones (ERGP2024231737-42); and Intensive Root Crops Production across the Six Agro-ecological zones (ERGP2024231742) which as a total yearly budget estimated as \$250 million for year 2025. Within the period, the Bank will finance this operation with \$200 million, which is 6.8% of the total sector budget and 16% of the total budget for the aligned programmes. It also recognizes a Japanese Food Emergency Loan (15 billion Japanese Yen) which will be disbursed to the Nigerian authorities in 2025; and contributions by other development partners including the Islamic Development Bank, through parallel financing arrangements.

For wheat and rice cultivation, expenditure comprising of seed and agro-inputs, mechanization, irrigation and labour costs \$700/ha and the revenue estimate at conservative yields of 3mt/ha is \$1,714/ha, making the activity highly profitable. Detailed cost benefit analysis will be undertaken during the Project Appraisal. Meanwhile, the project will lead to additional financial benefits for the agro-input dealers, fertilizer and other agro-chemical manufactures / blending companies, and seed companies. It will also lead to non-financial benefits such as institutional strengthening for the NASCs and mandated NARIs; and reinvigorate the national seed system and fertilizer quality control.

3.1.4. Institutional Framework for Program Implementation

The operation will be governed by a **National Steering Committee** that is chaired by the Hon. Minister of Finance & Coordinating Minister of the Economy (CME). Other members of the NSC are the Ministers of Federal Ministries of Agriculture and Food Security; Environment, Water Resources, and Sanitation; Livestock Development; Budget Planning. The NSC will be supported by a **Technical Working Committee** (TWC) chaired by the Permanent Secretary of the Federal Ministry of Agriculture and Food Security. Other members of the group are the International Economic Resources Department (IERD) of the Federal Ministry of Finance; made up of Directors of the Federal Department of Policy and Planning; Farm Inputs Support Services Department (FISS); Federal Department of Agriculture (FDA); Federal Department of Agriculture Extension (FDAE); Director General of National Agricultural Seed Council; Director General of the River Basins Authority; Seed Entrepreneur Association of Nigeria (SEEDAN); Fertilizer Producers and Suppliers Association of Nigeria (FEPSAN); National Agro-Input Dealers Association (NAIDA); All Farmers Association of Nigeria (AFAN) and the NAGS National Project Coordinator as Secretary.

The Federal Ministry of Agriculture and Food Security shall be the **Executing Agency** for the Operation, and the National Agriculture Growth Scheme (NAGS) Secretariat will be the **Implementing Agency**. The Secretariat is headed by the National Project Coordinator. It has ten (10) units, namely Agricultural Extension Services; ICT; Subsidy Management; Monitoring and Evaluation; E&S Safeguards, Legal, Procurement, Finance & Accounts, Administration and Communications & Partnership. Working with other relevant departments of FMAFS and State Coordinators for the NAGS, the NAGS Secretariat will be responsible for the

day-to-day implementation of the activities of the Program and report to a Technical Working Committee (TWC) described above.

The NAGS Secretariat has its Coordination Unit, managed by the National Coordinator and a Deputy. It has Five (5) main Technical Units namely: Agricultural Extension Unit, ICT Unit, Subsidy Management Unit, M&E and Communication and Partnership; and other key staff for fiduciary (procurement, finance), environmental and social safeguard and human resources. Notably, the proper staffing of the E&S function is critical to mainstreaming safeguards in the program operations. The Agriculture Service Unit has staff with expertise in Extension Farm Inputs, Land Use; Agricultural Market Research and Policy Analysis at the Federal Level; and Field Operations Officers at the State and Regional Levels. The ICT has software developers, network administrators and data analysts, while the Subsidy Management Unit has subsidy officers and financial analysts; and the Communication and Partnership Unit has Communication Officers and Partnership Officers. The NAGS-AP secretariat has a dashboard that provides real-time information on inputs delivery and uses restricted platforms for information sharing and addressing emerging issues at the various redemption centres. It collaborates with security agencies (Police, DSSS, and NSCDC) for crowd control and maintenance of law and order at the centres and FISS and NASC for controlling the quality of the seed and agro-inputs delivered to farmers. The Secretariat also works with TAAT and selected NARIs for monitoring and evaluation during the crop husbandry.

The monitoring and evaluation of the progress towards targets for the proposed RBF will be carried out by NAGS secretariat alongside the reporting on the implementation of the NAGS. NAGS Secretariat has demonstrated capacity and skills to undertake the monitoring and evaluation activity of the RBF program through results-based management frameworks. The National Steering Committee will provide high level oversight to ensure efficient use of the allocated funds. An Independent Verification Agency (IVA) will be selected to verify the attainment of DLIs before the release of funds, in accordance with the agreed schedule. The skills for undertaking Monitoring and Evaluation activities will be enhanced through capacity building of staff from the Federal Ministry of Finance, Federal Ministries of Agriculture and Food Security and the Executing Agencies under Results Area 5.

3.2. PROGRAM ENVIRONMENTAL AND SOCIAL RISKS

3.3.1. E&S Categorization

The African Development Bank's Integrated Safeguards System (2023) outlines a three-tiered categorization framework described as follows:

Category 1: High-risk operations likely to cause significant and/or irreversible adverse environmental and/or social impacts on a large scale, or to significantly affect environmental or social components that the Bank or the borrowing country considers sensitive. This includes projects classified as *high risk* under national legislation or *moderate-risk* projects financed by the Bank in a low environmental and social (E&S) implementation capacity or fragile context.

Category 2: Moderate-risk operations likely to cause adverse E&S impacts that are lower than in Category 1 operations, medium-scale, easily reversible, and readily minimized by applying appropriate management and mitigation measures, or incorporating internationally recognized design criteria and standards. These include projects classified as *moderate risk* under national legislation, or *low-risk* projects financed by the Bank in a lack of E&S implementation capacity or fragile context.

Category 3: Low-risk operations that do not directly or indirectly adversely affect the environment and that are unlikely to induce adverse social impacts. This category does not require a formal ESA although E&S mitigation or maximization measures may be included/recommended in the project design.

This categorization system takes into account: (i) the nature and magnitude of E&S risks and impacts of subprojects; (ii) the sectoral and geographical context; and (iii) the type of financing, in assigning an E&S Category to a project. The Bank's E&S Categorization System closely aligns with the national E&S categorization framework as outlined in the Environmental Impact Assessment (EIA) Procedures and Charges Regulations, 2021. The Fifth Schedule offers guidance on EIA categorization which consists of three levels including Category I (High Risk), Category II (Medium Risk) and Category III (Low Risk) similar to the three-tiered system adopted by the Bank as already described.

With reference to the national categorization framework, all agricultural and rural development projects and programs are classified as Category II except where the project site is in close proximity to Environmental Sensitive Areas (Coral reefs, Mangrove swamps, Small islands, tropical rainforest, Areas with erosions prone soils, Areas prone to desertification (and semi-arid zones), Natural conservation areas, Areas which harbour protected or endangered species, Areas of unique scientific interest, Areas of historic or archeological interest or culture and Heritage sites).

Based on the review of planned activities, the Program was classified as Category 2 in line with Bank's Integrated Safeguards System (ISS), according to the categorization memorandum approved on 16th October 2024. Thus, all investments likely to be classified as high E&S risk (Category 1), according to the Bank's ISS, are not eligible under this program. The justification for the E&S categorization has been based on the nature, scale, sensitivity, and location of the proposed project interventions. Program activities such as supply and installation of pumps for irrigation (small scale solar-powered, compressed natural gas (CNG)-powered pumps etc.) and utilization of soil/crop specific fertilizer blends and agrochemicals have the likelihood to generate limited, site-specific, and reversible E&S impacts.

3.3.2. Program's Environmental and Social Risks

The key risks that are associated with the project include:

- i) **Chemical degradation of soil** may result from insufficient or inappropriate use of mineral fertilizers, failure to recycle nutrients contained in crop residues, and failure to correct changes in soil pH that result from long-term use of nitrogen fertilizers and excessive use of poor-quality water, resulting in salinization.
- ii) **Contamination of ground and surface water** with parameters exceeding approved regulatory limits on account of the use of agrochemicals;
- iii) **Exposure to Hazardous Products, including Pesticides and Herbicides** - Potential exposures to pesticides include through dermal contact (e.g., in storage rooms or from leaking containers or splashes/spillage) during preparation, mixing, and application; inhalation during preparation, mixing, and application; and in storage rooms; and ingestion by swallowing the pesticide or contaminated foodstuffs.
- iv) **Exposure to organic dust** - Threshing, handling, and storage of grain generate potentially high

concentrations of organic dust, including particles from grain, fungi, and bacteria, as well as inorganic material.

- v) **Occupational health and safety hazards** resulting from operational activities involving ergonomics and physical activities. **Risk of serious injury and fatality** on account of fire and explosions due to inappropriate handling of CNG-powered pumps.
- vi) **Emissions of persistent organic pollutants (POPs)** due to burning pesticide-treated agricultural wastes and by-products (e.g., pesticide containers) which can contribute to environmental pollution.
- vii) **Vulnerability and community safety-related risks** due to potential exposure to pesticides (e.g., spray drift, improper disposal and use of packaging and containers for domestic chores) and presence of pesticides or by-products in potentially harmful concentrations in foodstuffs and postharvest products. Other related issues include increased risk of vehicle or machinery injuries on roads and access routes around the community.
- viii) **Violation of labour and other rights** on account of workers' engagement during program implementation across all the states
- ix) **Sexual Exploitation Abuse and Harassment (SEAH)** risks in relation to women and youths' access, inclusion and participation in program activities, especially in conflict-ridden beneficiary States and regions.
- x) **Personal Security and Safety risks** may be triggered as a result local and communal crisis or region-specific security challenges, including incursion of insurgents into farming communities, farmers-herder clashes, and kidnapping menaces. Community exposure to the influx of migrant workers may potentially result in conflict due to cultural and political reasons.

3.3.3. Program's Climate Risk Review and Categorization

Nigeria is particularly prone to climate change and is vulnerable to key climatic impact drivers such as sea level rise, aridity, heavy and unpredictable rainfall, mean air temp increase, frequent flash floods, and heatwaves. Nigeria's Climate Vulnerability and Adaptability Score Card using the Notre Dame Global Adaptation Initiative (ND-GAIN) Country Index, ranks Nigeria 154th out of 181. A vulnerability score of 0.486 indicates high susceptibility. Nigeria's high score indicates climate risk and adaptation difficulties, and the agricultural sector is highly vulnerable to climate change. In the northern states, increasing drought intensity and prolonged dry spells have led to reduced soil moisture and diminished crop yields, while the southern and coastal areas are facing the risk of intensified flooding and sea level rise. These extreme weather events contribute to disruptions in planting season, crop failures, and overall food insecurity. The high dependency of rural populations on smallholder farming exacerbates the impacts, as these communities often have limited adaptive capacity (National Climate Policy for Nigeria, 2021). Furthermore, climate-induced variability increases pest and disease incidences, further undermining production of key staple crops such as wheat, rice, maize, and cassava.

Preliminary screening under the Bank’s Climate Safeguards System has classified this Program as a Category 2 operation. This reflects its moderate vulnerability to climate risks—such as intensifying drought conditions in the northern states and increased precipitation along with sea level rise in the southern and coastal areas. Moreover, the high incidence of poverty and the heavy reliance of vulnerable populations on agriculture and natural resources further exacerbate the impacts of climate change on crop yields, farmer incomes, livelihoods, nutrition, and overall food security. However, technologies exist to reduce the impacts of climate change while increasing productivity and building resilience among vulnerable communities in Nigeria. These actions will contribute to climate change mitigation and the creation of green jobs in rural areas, whilst addressing the needs of vulnerable groups, youth and women and enhancing gender equality, improved nutrition, social equity and inclusive development.

To counter these vulnerabilities, the NAGS 2.0 program will implement a suite of climate adaptation strategies, that are fully aligned with Nigeria’s National Adaptation Plan and the National Climate Policy such as the implementation of Climate Smart Agriculture (CSA), the Blue Economy and nature-based approaches. CSA includes climate-resilient technologies such as climate-adaptive seeds, land-use best practices to capture and store carbon, irrigation technology to minimize water footprint, and risk insurance to cover failed crop seasons and livestock assets. The NAGS 2.0 program will also support the deployment of digital technologies to accelerate adaptation to climate change for over 40 million smallholder producers. Investments in the Blue Economy will increase per capita annual fish consumption from 10 to 20 kg, improving food and nutritional security through the sustainable utilization of aquatic and marine resources. Nature-based solutions will protect and enhance biodiversity and carbon stores. These technologies will increase productivity, climate-proof food supply chains, and help communities adapt to climate change, whilst creating millions of green jobs.

The NAGS 2.0 program will also support the provision of Early Warning Systems and Extension Services and strengthening collaborations with the Nigerian Meteorological Agency to provide timely climate forecasts and advisories; enhancing extension services to disseminate best practices and enable farmers to adjust planting calendars based on weather predictions. It will also provide capacity building and institutional development on integrated climate risk management.

3.3.4. Gender Equality and Women Empowerment

This project is Category 2 according to the Bank Gender Marker System, as a women empowerment perspective will be applied across components and actions towards the reduction of gender gaps in outcomes. Considering the National Gender Policy in Agriculture and the National Gender Policy of the Federal Government the project will include targets in jobs creation, skills development and procurement for women enterprises in the results framework. A Gender Action Plan will be developed to guide the work on women advancement and the reduction of gender gaps. Amongst others there will be a women empowerment strategy for the reduction of gender gaps in results area, a target of parity (30%) in the training of new seed inspectors and young entrepreneurs, affirmative action for women cooperatives and gender diverse cooperatives and a gender responsive governance for the agri-food sector. Taking into account the risks identified related to Violation of labour and other rights and Community exposure to influx of migrant workers potentially resulting

in conflict, and also in gender-based violence in public spaces, a social education and communication plan on gender equality and women advancement will be developed.

4. ASSESSMENT OF THE ENVIRONMENTAL AND SOCIAL SYSTEM OF THE PROGRAM

This chapter explores general and sectoral national political and legal, environmental and social frameworks that are critical to the successful implementation of the Program. It offers insight into the architecture of the country's environmental and social system that supports the mainstreaming of safeguards requirements in the project design and execution. In addition, it presents a review of key broad and sectoral policies and frameworks connected to public consultation, disclosure and access to information and grievance redress mechanisms which are key levers for ensuring participatory inclusion of relevant stakeholders in the project. Based on the assessment, high-level recommendations are presented for integration in the project implementation to ensure that the underlying project objectives and environmental and social outcomes are achieved.

4.1. Political and legal framework for the country's environmental and social assessment:

This section highlights policies (environmental, land, social protection, etc.), laws, regulations, national environmental and social assessment procedure, procedures for obtaining permits, etc. that are relevant to the Program's implementation.

Nigeria's political architecture comprises a federation of thirty-six (36) states, seven-hundred and seventy-four (774) local government areas (LGAs), with one federal capital territory (FCT). The country operates a three-tier governance structure consisting of a Federal Government, and States and Local Governments at the national and subnational levels respectively. The Constitution of the Federal Republic of Nigeria 1999 (as amended in

2010, 2017 and 2023³) is the primary legal framework of the country. The Constitution vests in the Federal Government three types of power: legislative, executive and judicial power, with associated organs, institutions and mechanisms to operationalize these powers. It further unequivocally establishes provision for the constitution of a local government system⁴. At all levels of government, there are statutes including, acts, regulations, policies, edicts and byelaws.

A review of the most relevant national and sectoral policies, legislation and institutional framework critical to applying an environmental and social lens into the Program is presented as follows:

- I. **The Constitution of the Federal Republic of Nigeria 1999 (as amended in 2010, 2017 and 2023:** As the main legal instrument of the country, the Constitution of the Federal Republic of Nigeria 1999 (as amended) contains provisions on food security and the protection and preservation of the natural and human environment. In Chapter 2 (Fundamental Objectives and Directive Principles of State Policy), sections 16A, 17 and 20 outlines provisions on food security, social and environmental objectives as highlighted in the following paragraphs:

Section 16A- Food Security⁵

(1) The State shall direct its policy towards ensuring that –

- a) strategies that guarantee food security of the nation regarding availability, accessibility, and affordability of food to the citizens are initiated, undertaken, and implemented;*
- b) the means of production, conservation and distribution of food are upgraded and improved upon on a continuous basis; and*
- c) adequate measures are provided to ensure that food security of the nation is not compromised by any individual, group, or institution.*

(2) The State shall promote and sustain activities that enhance food security.

Section 17 – Social Objectives

(1) The State social order is founded on ideals of Freedom, Equality and Justice.

(2) In furtherance of the social order-

- a) every citizen shall have equality of rights, obligations and opportunities before the law;*
- b) the sanctity of the human person shall be recognised and human dignity shall be maintained and enhanced;*
- c) governmental actions shall be humane;*
- d) exploitation of human or natural resources in any form whatsoever for reasons other than the good of the community, shall be prevented; and*

³ <https://faolex.fao.org/docs/pdf/nig164561.pdf>

⁴ Section 7: The system of local government by democratically elected local government councils is under this Constitution guaranteed; and accordingly, the Government of every State shall, subject to section 8 of this Constitution, ensure their existence under a Law which provides for the establishment, structure, composition, finance and functions of such councils.

⁵ [Section 16A is inserted by the Constitution of the Federal Republic of Nigeria, 1999 ((Fifth Alteration) (No. 34) Act, 2023]

- e) *the independence, impartiality and integrity of courts of law, and easy accessibility thereto shall be secured and maintained.*

(3) *The State shall direct its policy towards ensuring that-*

- a) *all citizens, without discrimination on any group whatsoever, have the opportunity for securing adequate means of livelihood as well as adequate opportunity to secure suitable employment;*
- b) *conditions of work are just and humane, and that there are adequate facilities for leisure and for social, religious and cultural life;*
- c) *the health, safety and welfare of all persons in employment are safeguarded and not endangered or abused;*
- d) *there are adequate medical and health facilities for all persons;*
- e) *there is equal pay for equal work without discrimination on account of sex, or on any other ground whatsoever;*
- f) *children, young persons and the age are protected against any exploitation whatsoever, and against moral and material neglect;*
- g) *provision is made for public assistance in deserving cases or other conditions of need; and*
- h) *the evolution and promotion of family life is encouraged.*

Section 20 - Environmental Objectives

The State shall protect and improve the environment and safeguard the water, air and land, forest and wildlife of Nigeria.

II. Harmful Waste (Special Criminal Provisions) Act. 1988 No 42

The Harmful Waste (Special Criminal Provisions) is an Act to prohibit the carrying, depositing and dumping of harmful waste on any land, territorial waters and matters relating thereto. The Act declares all activities relating to the purchase, sale, importation, transit, transportation, deposit, storage of harmful wastes to be prohibited and declared unlawful, the provisions of the Customs, Excise Tariff, Etc. (Consolidation) Act 1988, or any other enactment, or law notwithstanding. The Act declares that any person who, without lawful authority: (a) carries, deposits, dumps, or causes to be carried, deposited or dumped, or is in possession for the purpose of carrying, depositing or dumping, any harmful waste on any land or in any territorial waters or contiguous zone or Exclusive Economic Zone of Nigeria or its inland waterways; or; (b) transports or causes to be transported or is in possession for the purpose of transporting any harmful waste; or; (c) imports or causes to be imported or negotiates for the purpose of importing any harmful waste; or; (d) sells, offers for sale, buys or otherwise deals in any harmful waste, shall be guilty of a crime under the this Act. Other provisions of the Act deal with prosecution, crimes by body corporate and penalties.

III. Criminal Code Act Cap C38 LFN, 2004

The Nigerian Criminal Code makes it an offence punishable with up to 6 month's imprisonment for any person who:

- Violates the atmosphere in any place to make it noxious to the health of persons in general dwelling or carryon business in the neighbourhood, or passing along a public way; or

- Does any act which is, and which he knows or has reason to believe to be, likely to spread the infection of any disease dangerous to life, whether human or animal.

IV. The Penal Code Act Cap 53 LFN 2004

The Penal Code Act Cap 53 LFN 2004 is the principal criminal law in Nigeria's northern states. It supplements the Penal Code of the Northern States with federal provisions, covering various offenses like treason, mutiny, and counterfeiting. Whereas the Penal Code Act Cap 53 LFN 2004 does not directly address environmental pollution as a primary focus and does not explicitly criminalize environmental pollution as a specific offense, the Act's provisions can be applied to related crimes that may arise from such pollution.

Specifically, the Penal Code can be used to prosecute individuals who engage in actions that lead to or worsen environmental pollution, such as:

- **Public nuisance:** to prosecute individuals or organizations who create a public nuisance that harms the environment, such as illegal dumping or the emission of toxic substances.
- **Criminal trespass:** If someone enters or occupies land without permission and in the process damages the environment or causes pollution, such a person could be prosecuted for criminal trespass.
- **Assault and other offenses:** as applicable, actions that cause environmental damage could also be construed as assault, especially if they endanger human health or safety.

V. Land Use Act CAP L5 LFN, 2004

The land acquisition in Nigeria is achieved through 1) customary land tenure where land is inherited from one's ancestors, 2) willing-buyer-willing seller and 3) via allocation by government. The Land Use Act aimed to ease access to land for all Nigerians, prevent speculative purchases of communal land, streamline and simplify the management and ownership of land. The Act also aimed to make land available to governments at all levels for development and provide a unified system of administration of rights of occupancy for a secured land tenure. It vests all land in the State governments and Local governments making them the ultimate authorities over land ownership and management. Whereas the State government oversees land administration within its boundaries, lands outside the urban centers, i.e., rural land, is vested in the Local government.

The LUA defines the principles related to land tenure and defines the powers of state governors, to issue "certificates of occupancy", and conditions for issuing certificates and property development licenses in urban centers. Likewise, the LUA empowers the Local Government authorities to grant "statutory rights of occupancy" of lands within their respective jurisdictions.

The Local Government has the authority to administer and regulate the use of such land within its jurisdiction. The LUA provides for the establishment of a Land Allocation Advisory Committee (LAAC) to advise the Local Government on any matter connected with the management of land. The LAAC also has the responsibility to advise on matters related to the resettlement of people affected by land take.

The Act also provides guidelines for fixing and revising ground rent penalties and compensation for improvement of land. The state governors are vested with the power to revoke any right of occupancy under certain circumstances, with provisions for compensation and re-settlement within its jurisdiction. The LUA also defines the jurisdiction of high courts and other courts in land-related matters.

VI. Water Resources Act (Cap. W2 LFN 2004), Amendment in 2016

Water Resources Act 2004, as amended in 2016, has vested the rights and control of water in the Federal Government. Section 18 (1) of the WRA Cap. W2 LFN 2004 was amended in 2016, to review upward the stipulated fines and penalties for offences under the Act. The WRA stipulates that the Federal Government is responsible for the use and control of all surface and groundwater and of any watercourse affecting more than one State as described in the Schedule to WRA. This includes the totality of the content of the river, including the water, the bed and banks thereof, are by virtue of WRA, vested in the Government of the Federation. The federal government for the purpose is obliged to; “promote the planning, development and use of Nigeria's water resources; ensure the co-ordinate activities that are likely to influence the quality, quantity, distribution, use and management of water; ensuring the application of appropriate standards and techniques for the investigation, use, control, protection, management and administration of water resources; and facilitating technical assistance and rehabilitation for water supplies.

The provisions of the WRA shall not be construed as infringing or constituting a compulsory acquisition of any right over, or interest in property. Notwithstanding the fact that the WRA has vested the rights and control of such water courses that traverse more than one state in the Federal Government, WRA has also granted the rights to the use of water as follows:

“...any person may take water without charge for his domestic purpose or for watering his livestock from any watercourse to which the public has free access; or may use water for the purpose of fishing or for navigation to the extent that such use is not inconsistent with any other law for the time being in force; or who has a statutory or customary right of occupancy to any land, may take and use water from the underground water source or if abutting on the bank of any watercourse, from that watercourse, without charge for domestic purposes, for watering livestock and for personal irrigation schemes.”

The WRA clearly defines the process for acquisition of rights to use or take water, stating that *“any person or any public authority may acquire a right to use or take water from any watercourse or any groundwater described in the Schedule to this Act for any purpose in accordance with the provisions of this Act and any regulations made pursuant thereto.”*

Notwithstanding any other provision of the WRA, the Minister shall have power to define the places from which or the way and the times at which such water may be taken or used, including during actual or predicted time of water shortages, the amount which may be taken by any person. The Minister shall also prohibit, temporarily or permanently, the taking or use of water from any source if, in the opinion of the Minister, the use of such water would be hazardous to health, or when the rights granted to user are likely to override the public interest. The Minister shall also enforce the need for certification and licensing of any person undertaking the work of

drilling for water. Under WRA, the Minister is empowered to regulate the place, depth, manner of construction or mode of operation of any borehole or well; and to determine the times that groundwater may be abstracted. The nationally centralized water licensing system makes it easier to obtain a license by satisfying a common licensing requirements, as compared to meeting multiple requirements where the water catchment cuts across states (comprising 36 autonomous units and a Federal Capital Territory) and multiple LGAs (774). A major challenge, however, is that almost every industrial and commercial activity involving water, or use of water requires licensing the issuance of which is government by the Water Use License Regulation (WURL) 2016, as amended in 2020. Specifically, the WURL has listed a wide range of licensable activities (a total of 19) and licensable uses (20 in total). Thus, compliance with WRA is a very important requirement for AfDB funded projects in Nigeria, and it shall be noted that possession of land tenure rights does not override the need for compliance with WURL.

VII. Water Use and License Regulation 2016 (as amended 2020)

The Water Use and License Regulation (WURL) was enacted specifically to protect, conserve and control water resources for equitable and sustainable social and economic development and to maintain environmental integrity. The WURL also ensures an equitable and sustainable allocation, supply and distribution of water resources to foster best practices and conduct. In addition, the Act prescribes licensing for specified categories of water uses and specifies the conditions for licensing. The technical requirements for licenses or authorized developers and water service providers and users, as well as the infrastructure used for water services meet the technical, social and commercial obligations in a manner that promotes the wellbeing of citizens. The WURL states that “licensees are accountable and responsive to customer and community needs: and that *“public water services are supplied efficiently and economically in accordance with standards that reasonably meet the social, industrial and commercial needs of the community.”*

Part I, Section 2(1) of WURL has granted certain categories of users the right to use water without a license. That is, they do not need to grant any license to use water, so long as they do use water in accordance with the provisions of WURL under Section 2(1-4). These categories of water users include, among others, the use of water for personal purposes, subsistent living, cultural purposes, feeding of livestock, storage of water for purposes, etc. Part I, Section 3(1) declares that the right to use water, with or without license, is independent of the rights to ownership or occupancy of a land. That is to say that the right to own or occupy any parcel of land does not also grant the right to use water in the parcel of land or any other land, without a license, if such use requires licensing as specified in Part II of WURL.

VIII. National Agricultural Technology and Innovation Policy -2022 – 2027 (NATIP)

The Policy considers a mix of short-term and medium-term multi-stakeholder approaches towards ensuring resilience, recovery and growth and, at the same time, achieving a shift from subsistence farming to modern agriculture capable of ensuring national food security and contributing significantly to the national economic diversification drive and creating at least 12 million jobs.

The Policy built on the Agricultural Promotion Policy (APP), launched in 2016, aimed to address challenges in the sector, including food insecurity and reliance on imports. The APP aimed to enhance the performance of the agricultural sector through various interventions. It focused on boosting productivity, achieving food security, and diversifying the economy. The policy aimed to ensure adequate food supply and reduce reliance on imports and sought to diversify the economy by promoting agricultural exports and creating jobs within the sector. The policy also focused on enhancing productivity through various interventions, such as improved access to land, inputs, and technologies. It encouraged private sector investment in the agricultural sector to drive growth and innovation; promoted the integration of agricultural value chains to improve efficiency and profitability; and emphasized sustainable practices to ensure long-term productivity and environmental protection. Furthermore, the policy supported the development of essential infrastructure, such as roads, storage facilities, and processing plants, to facilitate agricultural production and trade.

IX. The Pest Control of Produce (Special Powers) Act, 1968

The Pest Control of Produce (Special Powers) Act in Nigeria, enacted in 1968, grants special powers to inspectors to inspect produce for pests at sea and airports before export. This Act complements the Produce (Enforcement of Export Standards) Act, and its provisions are supplemental to the latter. The Act also allows for the making of regulations to further regulate pest control in port areas and other matters ancillary to the Act's provisions. The primary goal is to ensure that produce exported from Nigeria is free from pests before it leaves the country. Inspectors are authorized to carry out inspections for pests at all sea and airports in Nigeria. The Act's provisions are applicable to produce intended for export, whether from or into Nigeria, subject to the Act. The Act allows the making of regulations to address specific aspects of pest control in port areas and other related matters, as detailed in the 1989 Regulations. Any provisions in the Produce (Enforcement of Export Standards) Act that conflict with the Pest Control of Produce (Special Powers) Act are to be read subject to the latter.

X. Agricultural (Control of Importation) Act Cap A13 LFN 2004

The Agricultural (Control of Importation) Act Cap A13 LFN 2004 is a Nigerian law that regulates the importation of agricultural products, particularly to control the introduction of plant diseases and pests. It allows the Minister of Agriculture to make regulations that restrict or prohibit the importation of certain goods if they are suspected of carrying diseases or pests. The Act also grants powers to officials to examine, detain, or destroy imported goods that may be infected

Permit Requirement: According to the FAO, a permit is required for the importation of certain items like living plants, seeds, and soil.

Phytosanitary Certificates: Importers are often required to provide phytosanitary certificates (certificates confirming the absence of diseases or pests) along with their import documents.

Examination and Detainment: Authorized officers have the power to inspect and detain imported goods to ensure compliance with the regulations.

Destroying or Treating Infected Goods: If goods are found to be infected, authorized officers may order their destruction or treatment to remove the disease or pest.

Penalties for Offences: The Act outlines penalties for violating its provisions, such as prosecution and fines.

XI. National Agricultural Seeds Council Act, 2019

The National Agricultural Seeds Council Act of 2019 aims to promote a dependable seed industry, regulate seed registration, and protect farmers from poor quality seeds. It establishes the National Agricultural Seeds Council⁶ (NASC) as a legal entity with the authority to regulate seed certification, sales, importation, exportation, and use. The Act also provides for variety development, plant variety protection, and seeds law enforcement.

Implementation of the NASC Act provides farmers with access to certified improved seeds, protection from fake or adulterated seeds, and potentially increased income. The Act contributes to poverty reduction, enhanced food production, and improved agricultural productivity. The Act provides the legal basis for official testing certification, sales, importation, exportation, and use of seeds. The Act includes provisions for variety development and plant variety protection (PVP). The Act establishes mechanisms for enforcing seed laws and regulations.

XII. National Fertilizer Quality Control Act 2019

The National Fertilizer Quality Control Act 2019 aims to regulate and ensure the quality of fertilizers in Nigeria. The Act's objectives include Promoting Agricultural Productivity (by ensuring the quality of fertilizers, the Act aims to promote agricultural productivity and food security); Protecting Consumers from substandard fertilizers, which can harm crops and the environment; and Regulating the Fertilizer Industry, promoting fair competition and preventing unfair trade practices. The key provisions include:

Regulation of Fertilizer Quality: The Act establishes standards for fertilizer quality, including labeling, packaging, and composition requirements.

Registration and Licensing: Fertilizer manufacturers, importers, and distributors must register and obtain licenses from the relevant authorities.

Quality Control Measures: The Act mandates quality control measures, including testing and inspection of fertilizers, to ensure compliance with standards.

Enforcement and Penalties: The Act provides for enforcement mechanisms, including penalties for non-compliance, such as fines and revocation of licenses.

Consumer Protection: The Act aims to protect consumers by ensuring that fertilizers meet quality standards, thereby promoting agricultural productivity and food security.

XIII. National Fertilizer Quality Control Regulations (NFQCR)

The National Fertilizer Quality Control Regulations (NFQCR) aim to ensure the quality and safety of fertilizers in Nigeria. The NFQCR's objectives include Ensuring Fertilizer Quality (Protecting farmers and the environment by ensuring fertilizers meet quality standards); Promoting Agricultural Productivity (by ensuring

⁶ <https://seedcouncil.gov.ng/>

fertilizer quality, the regulations aim to promote agricultural productivity and food security); Regulating the Fertilizer Industry, promoting fair competition and preventing unfair trade practices. The key aspects include:

Fertilizer Registration: *Fertilizers must be registered with the relevant authority before being imported, manufactured, or sold.*

Labeling and Packaging: *Fertilizers must be properly labeled and packaged to ensure accurate information and safe handling.*

Quality Control: *Fertilizer manufacturers and importers must implement quality control measures to ensure compliance with standards.*

Inspections and Testing: *Regular inspections and testing are conducted to ensure compliance with regulations.*

Penalties for Non-Compliance: *Penalties, such as fines and revocation of licenses, may be imposed for non-compliance.*

XIV. Federal Ministry of Agriculture and Food Security

The Federal Ministry of Agriculture and Food Security (FMAFS), formerly known as *The Federal Ministry of Agriculture and Rural Development (FMARD)*, was established in 1966 with a clear vision to ensure food security and promote agricultural sustainability in Nigeria. The Federal Ministry of Agriculture and Food Security in Nigeria has the mandate to develop the agricultural sector and promote rural socio-economic development. This includes ensuring food security in crops, livestock, and fisheries, stimulating agricultural employment, and promoting the production and supply of raw materials to agro-allied industries. FMAFS also aims to provide markets for agro-industrial products, generate foreign exchange, and facilitate rural socio-economic development. FMAFS's mandate is executed through its various organs comprising 12 Technical Departments, 13 Service Departments, 4 Federal Universities and 46 Parastatals/Agencies⁷.

XV. National Agricultural Land Development Authority (Amendment) Act 2016⁸

The Act to establish a National Agricultural Land Development Authority to provide, among other things, strategic public support for land development. The objectives of the Authority shall be to:

- provide strategic public support for land development;
- promote and support optimum utilization of Nigeria's rural land resources for accelerated production of food and fibre;
- encourage and support economic-size farm holdings and promote consolidation of scattered fragment holdings;
- encourage the evolution of economic-size rural settlements;

⁷ <https://agriculture.gov.ng/about-us/>

⁸ <https://www.nalda.gov.ng/about>

- provide gainful employment opportunities for rural people, raise rural incomes and improve on the general living standards in rural areas;
- expand productive capacity in agriculture and regain export capability in traditional and non-traditional crops; etc.

4.2. Environmental regulatory and institutional framework

This section describes the relevant regulatory framework applicable to the Program and the relevant rules and procedures (as applicable); institutional responsibilities, including the different decision-making levels, for the implementation of environmental management; internal review and authorization procedures such as licensing; consultation process required; publication of information; complaint handling mechanisms; monitoring and surveillance of the implementation of E&S instruments, among other salient issues.

I. National Policy on Environment (Revised), 2016

Nigeria's National Policy on Environment (NPEnv), as revised, provides guidance for managing the environmental (and social) concerns, and protecting the natural resources of the country. The strategic objective of NPEnv is to coordinate environmental protection and natural resources conservation for sustainable development, while NPEnv's specific objectives include:

- ensure that the quality of Nigeria's environment promotes good health and well-being;
- foster sustainable natural resource utilization and restoration/maintenance of biodiversity of Nigeria's ecosystems;
- promote individual and community participation in environmental improvement initiatives;
- provide clarity on the linkages between E&S and economic development issues; and
- stimulate public awareness and engendering a national culture of environmental preservation.

II. Federal Ministry of Environment

The Federal Ministry of Environment (FMEnv) is the arm of the Federal Government that is saddled with the executive responsibility of protecting the Nigerian environment, conserving her natural resources and fostering sustainable development of the country. The FMEnv was created in 1999 and mandated to be the guardian of Nigeria's natural environment, resources and actualize the national and global vision of the Federal Republic of Nigeria.

The Ministry also serves as the best agent for domestication of global environmental practices. The vision of FMEnv is "to be a Nation that develops in harmony with its environment", while the mission is to "to ensure environmental protection, natural resources conservation and sustainable development". The mandate of the FMEnv can be summarized as follows:

- Securing a conducive environment for good health and wellbeing of fauna and flora, while promoting sustainable use of natural resources;
- Restoring and maintaining the ecosystem, ecological process and preserving biodiversity, and promoting awareness and understanding of environmental linkages; and

- Cooperating with other Ministries Departments and Agencies, the private sector and local and international civil society organizations on environmental matters.

III. Environmental Impact Assessment Act, (EIA Act CAP E12 LFN, 2004)

The Environmental Impact Assessment (EIA) Act was enacted as EIA Decree, 1992 but became an Act of parliament now known as EIA Act CAP E12 LFN, 2004. The EIA Act is a crucial legislation that prescribes the mandatory consideration of potential environmental impacts of projects before they are undertaken. Due consideration for the provisions of the EIA Act is crucial in the decision-making process for any development project in Nigeria. In general, the EIA act spells out the objectives and the general principles guiding the environmental impact assessment in Nigeria. The prime objective of the EIA Act is to foster sustainable development by identifying, mitigating and managing the environmental and social impacts of development projects.

III. National Environmental Standards & Regulations Enforcement Agency (NESREA) Act, 2007

NESREA is an agency of the Federal Ministry of Environment that is responsible for enforcing environmental standards and regulations in Nigeria, with the exception of the oil and gas sector. The NESREA (Establishment) Act of 2007 confers on the agency the duty to protect the environment, biodiversity conservation for sustainable development of Nigeria's natural resources. In addition, NESREA is saddled with roles that include coordination and liaison with relevant stakeholders within and outside Nigeria on matters of enforcement of environmental standards, regulations, rules, laws, policies and guidelines.

The NESREA Act empowers the Agency (NESREA) to enforce all environmental laws, guidelines, policies, standards, and regulations in Nigeria, excluding the oil and gas sector. The Act also empowers NESREA to enforce compliance with international environmental agreements, protocols, conventions, and treaties to which Nigeria is a signatory. Some relevant NESREA regulations include:

- **National Environmental (Air Quality Control) Regulations 2014:** The objective of the National Environmental (Air Quality Control) Regulations 2014 is for improved control of Nigeria's air quality for enhancement of flora and fauna, human health and other resources affected by air quality deterioration.
- **National Environmental (Surface and Groundwater Quality) Control Regulation 2011:** The objective of the regulation is to restore, enhance and preserve the integrity of Nigeria's surface water, maintain existing water uses and control pollution of water bodies. The Regulations also set the standard for water quality and prohibit discharges that could result in the deterioration of water quality without approval granted under the Regulations.
- **National Environmental (Sanitation and Wastes Control) Regulations 2009:** The objective of the regulation is to minimise pollution and promote the adoption of sustainable and environment-friendly practices in environmental sanitation and waste management. These Regulations make adequate provisions for waste control and environmental sanitation, including punishments in cases of malfeasance.
- **National Environmental (Ozone Layer Protection) Regulations 2009:** The Regulations prohibit the importation or manufacture, either in part or whole of facilities that produce any ozone-depleting substance. The Regulations also prohibit the release of any ozone-depleting substance into the

atmosphere from any equipment, part of equipment or fire extinguishing equipment, except during firefighting.

- **National Environmental (Chemicals and Pesticides) Regulations, Statutory Instrument no. 92 of 2023.:** These Regulations, made under provisions of section 34 of the National Environmental Standards and Regulations Enforcement Agency (Establishment) (Amendment) Act 2007, apply to: restricted or banned chemicals and pesticides; storage, usage, and marketing of chemicals, pesticides and other agrochemicals; import and export of these substances; manufacture and import, of Mercury-Added Products (MAPs) and paints.

The objectives of these Regulations are:

- protecting human health and environment from the harmful effect of chemicals, pesticides and other agrochemicals;
- contributing to the sustainable development of agriculture and the conservation of the environment;
- ensuring an Environmentally Sound Management (ESM) of chemical and pesticides within their life cycle for the protection of human health and environment;
- supporting and strengthening the implementation of chemicals related international conventions and agreements;
- enforcing the Rotterdam Convention on the Prior Informed Consent (PIC) procedure for certain hazardous chemicals and pesticides in international trade;
- enforcing the ban on Persistent Organic Pollutants (POPs);
- controlling the transboundary movement of chemicals, pesticides, agrochemicals, wastes and their disposal;
- minimising pollution arising from the manufacture, use and disposal of Mercury-added products, and enforcing ban on these products;
- reducing Mercury emissions;
- promoting public information and education on Mercury hazards;
- eliminating the use of paints and coatings containing added lead compounds;
- providing standardised warning labels for all paints and other coating products to better inform consumers and workers of the hazards of lead exposure from paint products;
- preventing and reducing adverse effects of chemicals and pesticides.

Matters covered by these Regulations include:

- classification of chemicals and pesticides as hazardous substances;
- banned and restricted chemicals and pesticides;
- hazard signs and labelling requirements;
- handling and treatment of hazardous substances and their residues;
- transportation clearance and requirements;
- storage and safe use of hazardous substances;
- chemical waste classification and labelling, and recycling of waste;
- registration of chemicals and pesticides and issuance of clearance;
- testing of pesticides;
- control of levels of lead in paints and coatings;
- drafting of an emergency preparedness and response plan;
- general code of practice for a safe use of pesticides and other agrochemicals;

- enforcement notice and powers of the competent Agency; offences and penalties.

IV. Harmful Waste (Special Criminal Provisions etc.) Act CAP HI LFN 2004

The Harmful Waste Act (HWA) was enacted to prohibit any entity from carrying, dumping or depositing harmful wastes in the air, land or waters of Nigeria, except with expressed lawful authority. The contravention of the HWA is considered a criminal offence, and such contravention attracts life imprisonment, in addition to forfeiture of land or anything used to commit the offence.

V. National Agency for Food and Drug Administration and Control (NAFDAC)

The National Agency for Food and Drug Administration and Control was established by Decree No. 15 of 1993 as amended by Decree No. 19 of 1999 and now the National Agency for Food and Drug Administration and Control Act Cap N1 Laws of the Federation of Nigeria (LFN) 2004 to regulate and control the manufacture, importation, exportation, distribution, advertisement, sale and use of Food, Drugs, Cosmetics, Medical Devices, Packaged Water, Chemicals and Detergents (collectively known as regulated products).

The functions of NAFDAC as provided in the enabling law that establishes it are to:

- Regulate and control the importation, exportation, manufacture, advertisement, distribution, sale and use of food, drugs, cosmetics, medical devices, bottled water, Chemicals and detergents (Regulated Products);
- Conduct appropriate tests and ensure compliance with standard specifications designated and approved by the Council for effective control of quality of regulated products and their raw materials as well as their production processes in factories and other establishments;
- Undertake appropriate investigation into the production premises and raw materials for regulated products and establish relevant quality assurance systems, including certification of the production sites and of the regulated products;
- Undertake inspection of imported regulated products and establish relevant quality assurance systems, including certification of the production sites.
- Compile standard specifications regulations and guidelines for the production, importation, exportation, sales, distribution and registration of regulated products;
- Undertake the registration of foods, drugs, cosmetics, medical devices bottled water, Chemicals and detergents;
- Control the exportation and issue quality certification of products intended for export;
- Establish and maintain relevant laboratories or other institutions in strategic areas of Nigeria as may be necessary for the performance of its functions;
- Pronounce on the quality and safety of Products after appropriate analysis;
- Take measures to ensure that the use of narcotic drugs and psychotropic substances are limited to only medical and scientific purposes;
- Grant authorization for the import and export of narcotic drugs and psychotropic substances as well as other controlled substances;
- Collaborate with National Drug Law Enforcement Agency (NDLEA) in the bid to eradicate drug abuse in Nigeria;

- Advice Governments, the private sector and other interested bodies regarding the quality, safety and regulatory provisions on regulated products;
- Issue guidelines, grant approvals and monitor the advertisement of food, drugs, cosmetics, medical devices, bottled water, Chemicals and detergents;
- Compile and publish relevant data resulting from the performance of the functions of the Agency or from other sources;
- Sponsor such national and international conferences as may be considered appropriate;
- Liaise with relevant establishments within and outside Nigeria in pursuance of its functions and;
- Carry out such activities as are necessary or expedient for the performance of their functions.

NAFDAC has established up to 20 Directorates with different responsibilities, including those relevant to the agriculture sector and current Program such as:

- **Chemical Evaluation and Research (CER) Directorate:** Chemical Evaluation and Research Directorate has the mandate to safeguard public health by ensuring that only the right chemicals are manufactured, imported, exported, distributed, sold and used in Nigeria. The directorate is structured into four (4) divisions: Chemical Import Control Division (CIC), Agrochemicals and Controlled Chemicals Division (AC/CC), Chemical Monitoring and Risk Assessment Division (CM&RA) and Chemical Research & Review Division (CR&R).
- **Veterinary Medicine and Allied Products (VMAP):** The Directorate is mandated to regulate and control the manufacture, importation, exportation, sales, advertisement, distribution and use of: Veterinary Drugs, Veterinary Vaccines and Biologics, Pet Food – food for cat, dogs and other companion animals such as parrot etc, Animal Feed – complete cattle feed, Fish feeds, Poultry feeds etc., Animal feed concentrates, premix, additives, supplements and Fish meal- raw materials in feed production, Pesticides – Herbicides, Insecticides, Fungicides etc, and Agrochemicals – Fertilizers (Organic & Inorganic), Soil conditioners, Plant growth substance etc.

The core functions of VMAP consist of the following:

- Providing science-based advice and information on the quality, safety and efficacy of veterinary medicines, veterinary products, pesticides, and agrochemicals.
- Develop and promote standards, regulations, and guidelines in consultation with Government Agencies, professionals and stakeholders on veterinary medicines, veterinary products pesticides and agrochemicals.
- Regulate the manufacture and distribution of feed, feed ingredients, feed additives and drugs for animals.
- Regulate and control the safe use of pesticides and agrochemicals, feed ingredients, veterinary drugs and food for pet and companion animals.
- Conduct scientific research to establish appropriate regulatory measures to ensure safe and responsible use of veterinary medicine and allied products.
- Conduct industrial outreach to clarify the respective roles of industry and the Agency in veterinary medicines and allied products safety.
- Monitor production facilities and maintain vigorous inspection oversight to ensure standards are maintained.

Additional information relating to VMAP service offering and permit application and issuance processes can be accessed here: <https://nafdac.gov.ng/about-nafdac/nafdac-organisation/directorates/veterinary-medicine-and-allied-products/>

- **Investigation And Enforcement Directorate (IED):** The Investigation and Enforcement Directorate (IED) was established in 2001 to combat Substandard and Falsified (SF) Drugs, Unwholesome Foods, as well as other NAFDAC Regulated Products. The Head office of IED is in Lagos, supported by three outstation offices in Asaba- Delta state, Kaduna- Kaduna state and in the Federal Capital Territory. The functions of the IED are:
 - The Directorate is the arm of NAFDAC, principally responsible for ensuring compliance with the Agency's mandate on regulatory activities.
 - Coordinate enforcement activities of other Directorates, zonal and states offices of NAFDAC Nationwide.
 - Conduct Surveillance/Intelligence gathering on suspected products/premises/persons.
 - Carry out investigative activities and raids.
 - Investigation of cases of alleged contravening of NAFDAC laws and regulations
 - Collaborate with the Legal Services Directorate during arraignment and prosecution of suspects.
 - Conducts destruction of Substandard, Fake, Counterfeit, Expired, and other Unregistered NAFDAC regulated products.
 - Coordinates the storage of NAFDAC Regulated Products in the Agency's warehouses.
 - Collaborate with relevant stakeholders within and outside Nigeria in pursuance of the functions of the Agency in relation to the mandate of the Directorate.

NAFDAC has published a number of guidelines relevant to the agriculture sector and the current Program include:

- [GUIDELINES FOR ISSUANCE OF PERMIT TO IMPORT SEVERELY RESTRICTED CHEMICALS \(PESTICIDES, AGROCHEMICALS AND FERTILIZERS\) AND PERMIT TO IMPORT CHEMICALSUBSTANCES LISTED INSCHEDULEI, II, AND III OF THE 1997 CHEMICALWEAPON CONVENTION](#)
- [GUIDELINES FOR LABELING OF CHEMICALS MANUFACTURED IN NIGERIA](#)
- [GUIDELINES FOR WAREHOUSE INSPECTION](#)
- [PERMIT FOR CLEARANCE OF IMPORTED SEVERELY RESTRICTED CHEMICALS \(PESTICIDES, AGROCHEMICALS AND FERTILIZERS\) AND PERMIT FOR CLEARANCE OF IMPORTED CHEMICAL SUBSTANCES LISTED IN SCHEDULE I, II, AND III OFTHE1997 CHEMICAL WEAPON CONVENTION](#)
- [GUIDELINES FOR PRODUCTION INSPECTION OF CHEMICAL MANUFACTURING FACILITIES IN NIGERIA 2023](#)
- [NAFDAC GOOD MANUFACTURING PRACTICE GUIDELINES FOR CHEMICALS AND CHEMICAL PRODUCTS 2023](#)

- GUIDELINES FOR ISSUANCE OF PERMIT FOR CLEARANCE OF IMPORTED RESTRICTED AND AGROCHEMICALS (DUE FOR REVIEW SINCE 2023)
- GUIDELINES FOR REGISTRATION OF IMPORTED PESTICIDES IN NIGERIA (DUE FOR REVIEW IN 2026)
- GUIDELINES FOR REGISTRATION OF PESTICIDES MADE IN NIGERIA (DUE FOR REVIEW IN 2026)
- GUIDELINES FOR LISTING AS PESTICIDES, AGROCHEMICALS, FERTILIZERS, BIO-PESTICIDES AND BIO-FERTILIZERS MARKETERS (RENEWAL) (DUE FOR REVIEW IN 2026)
- GUIDELINES FOR ISSUANCE OF PERMIT TO IMPORT BULK PESTICIDES, AGROCHEMICALS AND FERTILIZERS (NEW APPLICANTS) (DUE FOR REVIEW IN 2026)
- GUIDELINES FOR ISSUANCE OF PERMIT TO IMPORT BULK PESTICIDES, AGROCHEMICALS AND FERTILIZERS (RENEWAL) (DUE FOR REVIEW IN 2026)
- GUIDELINES FOR LISTING AS PESTICIDES, AGROCHEMICALS, FERTILIZERS, BIO-PESTICIDES AND BIO-FERTILIZERS MARKETERS (RENEWAL) (DUE FOR REVIEW IN 2026)
- GUIDELINES FOR CLEARING OF IMPORTED GENERAL CHEMICALS, AGROCHEMICALS AND RAW MATERIALS AT PORTS OF ENTRY IN NIGERIA (DUE FOR REVIEW IN 2026)
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VI. National Environmental Health Practice Regulation Act 27, 2016

The main thrust of the Act is to:

- Provide a guideline for the enforcement of the regulatory powers in the Act;
- Prevent and abate nuisances;
- Protect, preserve and promote the physical and social well-being of the public;
- Prevent and control the incidence of communicable diseases through environmental health intervention;
- Reduce environmental hazards to health;
- Safeguard and maintain the aesthetic value of the environment;
- Promote the general welfare of the public by regulating the sanitary construction and sanitation of all premises; and
- Regulate private and public sector collaborations for purposes of maintaining adequate sanitation and promoting public health and safety.

VII. National Policy on Waste Battery Management 2022

This policy recognises that batteries used to power automobiles, industrial equipment and alternative energy systems may contain lead, lead alloys, lead and lithium compounds and dilute sulphuric acid, which if not correctly managed in an environmentally sound manner, can contaminate the environment and pose health risks

to the people. The policy identifies the proper management of waste batteries as a priority issue, taking into consideration the objectives of the National Policy on Environment, the Harmful Waste Act Cap HI LFN 2004 and the United Nations Basel and Bamako Conventions, of which Nigeria is a signatory. The specific objectives of the policy include the provision of standard guidelines regulating waste batteries management and strengthening institutions and human capacities for effective implementation of waste batteries policy in Nigeria, amongst others.

VIII. Climate Change Act 2021

The Climate Change Act 2021 (CCA) is Nigeria's efforts at mitigating the impact of climate change and promoting sustainable development. The CCA provides a framework for climate actions at the national level that positions Nigeria to achieve long-term goals in terms of climate change mitigation and adaptation. The CCA espouses the mainstreaming of climate actions and programs into environmental policies and national development towards net-zero greenhouse gas emissions by the year 2050-2070.

In June 2024, the Nigerian President approved the mandate for the Special Envoy on Climate Action (SPEC) with powers and roles derived from the CCA. The CCA also provides for a Climate Change Fund (CCF), which receives sundry sums, subventions and grants and donations, funding from International Organizations, fines and charges from private and public entities, carbon tax and carbon emission trading. The Fund is used for the payment of salaries and other emoluments of members of the Council, for funding new climate change mitigation projects, for conducting assessments of climate change impact on vulnerable communities. The CCA provides for a system of carbon budgeting, aiming at controlling and limiting the temperature increase according to Nigeria's international obligations.

IX. National Climate Change Policy, 2021-2030

The National Climate Change Policy (NCCP) in Nigeria was developed by the National Council on Climate Change, an agency of the Federal Ministry of Environment. The NCCP is the framework that guides Nigeria's response to the challenge of climate change and aims to foster low-carbon and high-growth economic development, to build a climate-resilient society and strengthen national institutions and regulatory mechanisms (policy, legislative and economic) for the governance of climate change.

The CCA facilitated the establishment of The Nigeria Climate Change Policy Response and Strategy (NCCPRS), the framework guiding Nigeria's response to the development challenges posed by climate change, which was developed through a participatory process involving relevant Ministries, Departments, and Agencies at Federal and State levels, private sector operators, and the communities. The formulation of action plan and implementation framework, sensitization, capacity building and strengthening in research and development in climate change matters, climate change governance, financing Nigerian Climate Change Policy Response and Strategy (NCCPRS) programmes, and international cooperation.

X. State Ministries of Environment

In each of the 36 states of the federation, there is a Ministry of Environment and/or an Environmental Protection Agency that is charged with the responsibility of providing a decent, orderly and reasonable conducive environment for habitable society, as contained in the assignments of Ministerial responsibilities. Inter alia, the State Ministries of Environment are empowered to give direction to all issues concerning the environment within its state, to monitor and to control pollution and disposal of solid, gaseous and liquid wastes generated by various facilities in their states. Some of the functions of the State Ministries of Environment include:

- Liaising with the Federal Ministry of Environment to achieve healthy or better management of the environment via development of National Policy on Environment;
- Co-operating with FMEnv and other National Departments/Agencies in the performance of environmental functions including environmental education/awareness to the citizenry;
- Responsibility for monitoring waste management standards;
- Responsibility for general environmental matters in the State; and
- Monitoring the implementation of EIA studies and other environmental studies for all development projects in the State, even though the federal legislation serves as the benchmark in the execution of standards in the states.

4.3. Social regulatory framework

This section presents an overview of the relevant social regulatory and institutional frameworks applicable to the Program and the relevant rules and procedures; institutional responsibilities for implementing social management, including roles and responsibilities for program areas that might include vulnerable groups and individuals, rights, procedures and requirements; social conflict; surveillance and monitoring, including indicators; scope of social assessment and / or social analysis.

I. Nigerian Labour Act, Cap L1 2004

The Nigerian Labour Act is a comprehensive legislation that governs labour practices in Nigeria. The Act was enacted to repeal and replace the Labour Code Act and consolidate the law relating to labour. The Nigerian Labour Act aims to regulate employment contracts and relationships between employees and employers. Consequently, the Act provides for protection of wages, contracts of employment, and sets terms and conditions of employment. The key provisions of the Nigeria Labour Act include the following:

- provides for the issuance of employment contracts for all employees;
- stipulates the minimum wage that must be paid to employees;
- regulates the working hours, rest periods, and conditions for overtime;
- provides for leave entitlements, including annual leave, sick leave, and maternity leave;
- governs termination of employment and redundancy procedures; and
- sets the basis for employee benefits to those eligible.

In addition, the Nigerian Labour Act addresses workplace safety by mandating employers to comply with the provisions of the Factories Act, to ensure the safety of workers, provide of a safe workplace and work equipment,

and ensure that work equipment is in safe working conditions. The Labour Act provides for mandatory benefits such as pension and gratuity, and compensation for work-related injuries, illnesses, or death. It provides for fair treatment and protection against unfair dismissal, suspension, termination, demotion, or other sanctions; and protection of wages, which must be paid in legal tender compliance with legitimate payment schedules.

II. The National Policy on Employment (NPE), 2017

Whereas legislative powers are shared between the Federal and State governments, the Federal government has exclusive power over labour issues such as trade unions, industrial relations, and worker welfare. However, both the Federal and State governments can legislate occupational safety and health, as well as promote industrial, commercial, or agricultural development. The NPE was formulated with the assistance of, and in collaboration with, the International Labour Organization to address employment challenges in Nigeria.

The NPE is guided by Section 17 of the 1999 Constitution that espouses the following:

- Equal opportunity for all citizens to secure employment without discrimination;
- Just and humane working conditions with adequate leisure and social facilities;
- Protection of health, safety, and welfare of workers; and
- Equal pay for equal work regardless of sex or other discriminatory grounds.

The aims and objectives of Nigeria's National Employment Policy include: i) Accelerate employment generation; ii) Reduce high rates of unemployment; and iii) Achieve full, productive, and freely chosen employment. Key strategies for realizing the aims and objectives of the National Policy on Employment include revitalizing the private sector, transforming agriculture, improving infrastructure, enhancing market access for businesses; and providing credit facilities.

III. National Policy on Occupational Safety and Health 2006 (Revised 2020)

The National Policy on Occupational Safety and Health derived its main ground from the 1999 constitution, which in section 17 (3c) prescribes that the Nigerian State shall make laws and bye-laws to preserve the health and well-being of workers in workplaces. The goal of the National Policy on Occupational Safety and Health 2020 is to facilitate the improvement of occupational safety and health performance in all sectors of the economy and ensure the harmonisation of workers' rights protection with regional and international standards.

IV. The Child Rights Act (CRA 2003)

The CRA codifies the rights of children in Nigeria and implements the core principles that were enshrined in the 1989 Convention on the Rights of the Child (CRC) and the 1990 African Union Charter on the Rights and Welfare of the Child. Each state must adopt and implement the Act in its territory for the CRA to become law. However, only 35 of the 36 states have adopted and implemented the CRA, leaving the state of Kano in northern Nigeria with a legal statute that does not meet international standards for the prohibition against the use of children in illicit activities. The relevant provisions in the Child Rights Act that prohibit child labour are:

- Section 28(2) states: “No child shall be employed or work in an industrial undertaking and nothing in this subsection shall apply to work done by children in technical schools or similar approved institutions if the work is supervised by the appropriate authority”.
- Section 28(3) states: “Any person who contravenes any provision of subsection (1) or (2) of this section commits an offence and is liable on conviction to a fine not exceeding fifty thousand Naira or imprisonment for a term of five years or to both such fine and imprisonment”.
- Section 28(4) stated: “Where an offence under this section is committed by a body corporate, any person who at the time of the commission of the offence was a proprietor, director, general manager or other similar officer, servant or agent of the body corporate shall be deemed to have jointly and severally committed the offence and may be liable on conviction to a fine of two hundred and fifty thousand Naira”.
- Section 29 of Child Rights Act recognized and incorporated the provisions of sections 59-63 of the Labour Act, meaning that section 59 -63 of the Labour Act is applicable to children under the Child Rights Act.
- Section 30 (1) prohibits the buying, selling, hiring or dealing in children.
- Section 32 (2) prohibits the use of children for the following: begging for alms, prostitution, domestic or sexual labour or other immoral purposes; as a slave or for practices similar to slavery like, sale or trafficking, debt bondage or serfdom and forced or compulsory labour, hawking of goods or services on main streets, brothels or highways, for production of pornography or pornographic performance, for the production or trafficking of illegal drugs and for any purposes that deprives the child the opportunity to attend and remain in school. These relevant provisions in Section 30 and 32 of the Child Rights Act align with the unconditional and condition Worst Form of Child Labour in the ILO Convention No.182

V. NATIONAL POLICY ON CHILD LABOUR (PHASE II) 2022

Nigeria's National Policy on Child Labour (Phase II) 2022 aims to eliminate child labor in the country, particularly in its worst forms. This policy reflects the government's commitment to combating child labor by providing a legal framework and creating an enabling environment for its eradication. The key objectives of the Policy are:

- **Prevention and Protection:** Prevent children from engaging in child labor and protect those already involved
- **Withdrawal and Rehabilitation:** Withdraw children from child labor and provide rehabilitation support
- **Education and Vocational Training:** Provide access to education and vocational training for children
- **Poverty Alleviation:** Address poverty as a root cause of child labor
- **Collaboration and Partnership:** Foster collaboration among stakeholders, including government agencies, NGOs, and international organizations

The Specific Objectives include:

- a. To provide guidelines for ratification and timely domestication and implementation of all relevant, ratified international conventions and protocols by National and State Assemblies including ILO Convention 189; and for the harmonization of the minimum age of employment in Nigeria.
- b. Provide guidelines for awareness creation, advocacy and sensitisation among the general populace about the evil effects and consequences of child labour in Nigeria as well as its prevention.
- c. Provide guidelines and modalities for concrete direct action projects and programmes by governments and other relevant stakeholders at all levels, in combating child/forced labour.
- d. Provide guidelines for effective resource mobilisation and sustainability of action programmes. and projects amongst Implementing Partners and Agencies.
- e. Provide a coordinating and networking framework of action. programmes among stakeholders and Implementing Agencies on the elimination of child/forced labour in Nigeria with a view to strengthening and streamlining efforts.
- f. Provide guidelines for monitoring, evaluating and reviewing policies, legislation, regulations on projects and programmes on child/forced labour.
- g. Provide guidelines for child and youth participation in the elimination of child/forced labour.
- h. Develop and implement a national research agenda for a national database on child/forced labour

The policy is implemented by the Federal Ministry of Labour and Employment, which works closely with other government agencies, NGOs, and international organizations, such as the International Labour Organization (ILO). The ministry has also developed programs to address child labor, including Child Labour Programme: (aims to eliminate child labor in Nigeria) and National Steering Committee for the Elimination of Child Labour (oversees implementation and monitoring of child labor policies).

VI. National Action Plan on the Elimination of Child Labour (2021-2025)

Nigeria's National Action Plan (NAP) on the Elimination of Child Labour (2021-2025) aims to eradicate child labor in the country. Developed by the Federal Ministry of Labour and Employment, this plan bridges gaps identified in the previous NAP (2013-2017) and aligns with Target 8.7 of the Sustainable Development Goals (SDGs). The plan also emphasizes the need for:

- **Strengthening laws and enforcement:** Improving labor inspection, prosecution of offenders, and protection of victims.
- **Social programs:** Implementing initiatives like education and vocational training to prevent child labor.
- **Collaboration:** Working with international organizations, NGOs, and stakeholders to leverage resources and expertise.

Key aspects of the plan include:

- **Goals:** Eliminate the worst forms of child labor by 2025 and all child labor by 2030.
- **Coordination:** Establishes a National Steering Committee for the Elimination of Child Labor (NSCCL) to oversee implementation, comprising representatives from government agencies, faith-based organizations, NGOs, ILO, and UNICEF.

- **Implementation:** Includes time-bound activities, monitoring, and evaluation mechanisms for quarterly progress assessments.
- **Focus areas:** Addresses child labor in various sectors, including agriculture, mining, domestic work, and commercial sexual exploitation.

VII. Employee Compensation Act of 2010

An Act to provide compensation for injuries and death suffered by workers in the course of their employment. This legislation, the first of its kind in Nigeria, sought to incorporate international standards as they relate to worker's compensation. It caters to the welfare of injured workers.

The Act makes the following mandatory for employers:

- Pay compensation to any of their employees who suffers injury from any accident arising out of and in the course of his employment; and
- Pay compensation to the person or persons entitled to the estate of any of his employees who dies from an accident arising out of and in the course of his employment.

VIII. National Gender Policy in Agriculture 2019⁹

The National Gender Policy on Agriculture aims to promote gender equality and empower women in Nigeria's agricultural sector. The policy's objectives include Promoting gender equality and empowering women in agriculture; Improving agricultural productivity and food security through gender-responsive approaches; and Enhancing women's empowerment and decision-making capacity in agriculture.

Key aspects include:

Promoting Women's Participation: Encouraging women's participation in agricultural decision-making, production, and marketing.

Addressing Gender Disparities: Addressing disparities in access to land, credit, extension services, and other resources.

Empowering Women: Empowering women through capacity building, training, and support services.

Mainstreaming Gender: Mainstreaming gender considerations in agricultural policies, programs, and projects.

Monitoring and Evaluation: Establishing mechanisms for monitoring and evaluating progress towards gender equality in agriculture.

The goal of the gender policy is to ensure equal opportunities and access to resources, services and agricultural programmes in Nigeria regardless of gender as a means of providing economic security growth in Nigeria. In addition to the Policy, the FMAFS (previously FMARD) developed the National Gender Action Plan (NGAP)

⁹ <https://www.cgiar.org/annual-report/performance-report-2019/gender-policy-on-agriculture-in-nigeria/>

for Agriculture in Nigeria which is a strategic framework that aims to promote gender equality and women's empowerment in Nigeria. In the context of agriculture, the NGAP may include:

Gender Mainstreaming: Integrating gender considerations into agricultural policies, programs, and projects.

Women's Empowerment: Empowering women through capacity building, training, and support services.

Access to Resources: Improving women's access to land, credit, extension services, and other resources.

Decision-Making: Increasing women's participation in decision-making processes in agriculture.

Monitoring and Evaluation: Establishing mechanisms for monitoring and evaluating progress towards gender equality in agriculture.

IX. Violence Against Persons (Prohibition) Act 2015

The Violence Against Persons (Prohibition) [VAPP] Act prohibits all forms of violence, including physical, sexual, psychological, and domestic, and harmful traditional practices. The main aim is to "prohibit all forms of violence against people, ensure appropriate punishment for offenders, and provide maximum protection and effective remedies for victims". VAPP Act criminalized Sexual Gender Based Violence (SGBV), Harmful Practices (HP) and Violence Against Women and Girls (VAWG). The VAPP Act expanded the definition of rape to include non-consensual penetration of anybody opening of any, and by any, of the genders. Thus, both males and females can be perpetrators as well as victims of rape. This Act aligns with aspects of OS7, however, the VAPPA Act is a federal law and most the states have not domesticated it due to socio-cultural dissention, therefore, suffers weak enforcement.

X. Federal Ministry of Women Affairs and Social Development (FMWA&SD)

The Federal Ministry of Women Affairs and Social Development (FMWA&SD) plays a critical role in advocating for women's rights, empowerment, and social well-being in Nigeria. The Ministry focuses on promoting the development of women and children. mandate and purpose of the FMWA&SD are to realize the government's actions on issues around gender, children and matters affecting the aged persons and those with disabilities. The ministry is instrumental in initiating policy guidelines and leading efforts toward gender equality and mainstreaming at both the national and international levels.

The vision and focus of the FMWA&SD are to ensure equal access to social, economic, and wealth creation opportunities for all, regardless of gender, in Nigeria. To this end, FMWA&SD focuses on the protection of children, the aged, and people with disabilities, by engaging critical stakeholders in both the private and public sectors to prioritize the concerns of these groups in national development processes.

The ministry collaborates with various organizations including UN-Women, to advance gender equality and social Development. The goals of the ministry are achieved through its flagship agency, the National Centre for Women Development (NCWD). The NCWD was established in 1992, and it is modelled after the International Research and Training Institute for the Advancement of Women (INSTRAW). The NCWD plays a crucial role in advancing women's rights, empowerment, and well-being in Nigeria.

The focus of NCWD is on training and economic empowerment of, especially rural women, women to better their lives. In addition to training and research, NCWD also engages in advocacy against gender-based violence and it launched the gender-based violence (GBV) Dashboard to capture reported cases of violence against women. In November 2023, the National Resource Centre for Women in Politics (NRCWP) commissioned to support women's active participation in politics, in collaboration with UN Women, a collaborative UN-sponsored program promoting women's participation in politics and decision-making in Nigeria.

XI. National Centre for Women Development

The National Centre for Women Development (NCWD) is an important agency under the Federal Ministry of Women Affairs and Social Development, established by Decree No. 11 Section 1 (5) of 1995. The NCWD was commissioned on October 17, 1997, and modelled after the United Nations International Research and Training Institute for the Advancement of Women (INSTRAW). NCWD is charged with the responsibility of stimulating and promoting the development of Nigerian Women. The NCWD facilitates the formulation of policies, skills development and income generating activities for the Nigerian women in both urban and rural centres. The NCWD is the databank on women and development in Nigeria and offers guidance and counselling to Nigerian women and engages in promoting gender equality and women's empowerment in Nigeria.

XII. Management of Land Acquisition

Land holdings in Nigeria can be broadly classified into public/government, private, and communal. Public/government lands are lands owned by government comprising federal, state and local governments and their agencies. Private lands are defined as those whose ownership is vested in private individuals, families, and lands under customary tenancies. Communal lands are lands which have their ownership vested in communities. These lands are usually administered by community leaders with the assistance of their councils of elders.

The legal basis for land acquisition and resettlement in Nigeria is the Land Use Act of 1978 which was modified in 1990. The critical sections regarding land acquisition are as follows:

- **Section 1:** Subject to the provision of this Act, all land comprised in the territory of each state in the Federation is hereby vested in the Governor of each state and such land shall be held in trust and administered for the use and common benefit of all Nigerians in accordance with the provision of this Act.
- **Section 2:** (a) All land in urban areas shall be under the control and management of the Governor of each State; and (b) all other land shall be under the control and management of the local government within the area of jurisdiction in which the land is situated.

Therefore, according to the Land Use Act, all land in Nigeria is vested in the Governor of each State and shall be held in trust for the use and common benefit of all people. The administration of land area is divided into urban land which is directly under the control and management of the Governor in each State; and non-urban land, which is under the control and management of the Local Government. The Governor of each State has the right to grant statutory rights of occupancy to any person or any purpose; and the Local Government will have

the right to grant customary rights of occupancy to any person or organization for agricultural, residential and other purposes.

The program activities do not involve any form of land acquisition; hence, no further assessment of the program's capacity was undertaken.

4.4. Public Consultation, disclosure, and access to information

In Nigeria, several policies and legislation make provisions for public consultation, disclosure and access to information considering the importance of inclusive stakeholder participation in planning and decision-making for investments / sub-projects and in implementation. A high-level overview of relevant policies and legislation is presented as follows:

- **Freedom of Information Act (2011):** Provides citizens with the right to access information and promotes transparency in governance.
- **Environmental Impact Assessment (EIA) Act Cap E12 (LFN 2004):** Requires public participation and stakeholder engagement in environmental impact assessments.
- **National Environmental (Sanitation and Wastes Control) Regulations, 2009:** Mandates public consultation and participation in waste management planning.
- **Land Use Act 1978:** Requires consultation with relevant stakeholders, including communities and individuals, before land acquisition or allocation.
- **Public Procurement Act, 2007:** Promotes transparency and accountability in public procurement processes, including stakeholder engagement and grievance mechanisms.
- **National Policy on Public Private Partnerships (PPPs):** Encourages stakeholder engagement and consultation in PPP projects.
- **Nigeria Extractive Industries Transparency Initiative (NEITI) Act, 2007:** Promotes transparency and accountability in the extractive industries, including stakeholder engagement and grievance mechanisms.
- **National Human Rights Commission (Amendment) Act, 2010:** Provides a framework for addressing human rights issues, including grievance mechanisms.

The Nigerian Agricultural Seeds Council has developed a website for dissemination of information and provision of guidelines to relevant stakeholders. The key guidelines published include:

- Guidelines and Manual for Rice Seed Certification and for National Agricultural Seeds Council Authorized Agents (Accessible: <https://seedcouncil.gov.ng/guidelines-and-manual-for-rice/>)
- Guidelines and Manual for Maize Seed Certification and for National Agricultural Seeds Council Authorized Agents (Accessible: <https://seedcouncil.gov.ng/guidelines-and-manual-for-maize/>)

Similarly, the Nigerian Seed Portal Initiative (<https://www.seedportal.org.ng/>) offers useful information regarding seed varieties and promotes innovation. The portal offers a directory for sourcing quality seeds from reputable Seed Companies in Nigeria.

4.5. Grievance Redress Mechanisms

In Nigeria, the legal system provides various avenues for seeking recourse in respect of any grievance. The judicial system such as the Supreme Court, Appeal Court, High Courts, Magistrate Court receives petition on matters between aggrieved parties in line with matters placed under their respective jurisdiction. Furthermore, there is unfettered access to the Public Complaints Commission where individuals and groups can lodge complaints against administrative injustice and get redress. Similarly, the Ministry of Justice makes provisions for Legal Aids Council established under the law (Legal Aids CAP L9, 2011) which provides legal aid and advice to people with low income, among others. Some state governments also have different institutional arrangements for providing free legal services to the poor and vulnerable, for example, Public Defender Law and Multidoor Courthouse Law in Delta State Nigeria; and the Special People's Law in Lagos State Nigeria.

The financial and technical interventions provided by the development finance institutions have played a significant role in influencing socially responsible practices across different projects in several States in Nigeria. Accordingly, project-specific Grievance Redress Mechanisms have been developed and implemented in order to meet the requirements of international financiers and partners. For example, partnership with the World Bank for the Rural Access and Agricultural Marketing Project (RAAMP)¹⁰ project led to the preparation of a Resettlement Policy Framework in 2018 which applies to project activities implemented across 18 States in Nigeria. Similarly, the implementation of ATASP-1 across four special agroecological zones involved the development and implementation of GRM. Typically, the structure of grievance resolution combines formal and informal (traditional or communal) approaches to ensure cultural appropriateness in the handling of grievances.

The implementation of NAGS AP 2.0 is expected to leverage the experience of the FMAFS and NAGS Secretariat in other sectoral interventions to develop and implement a robust GRM for addressing any emerging concerns from program host communities and other stakeholders. In addition to facilitating accessibility to the justice system when required, the GRM will protect complainants from any retaliatory action and systematize dissemination of information on grievance resolutions, archiving documentary records and evidence.

¹⁰ <https://ead.gov.ng/wp-content/uploads/2018/06/RPF-for-RAAMP-reviewed-120418Nneka.pdf>

The findings of the Environmental and Social System assessment are summarized in the form of a traffic light system focused on overall legal framework of the Country; (ii) presence of strategies and instruments to support policy; and (iii) the implementation practice based on experiential knowledge documented in research literature, insights elicited from highly experienced environmental and social safeguards professionals and other authoritative sources. The comparative analysis was undertaken with the following lens: (i) Applicable Operational Safeguards (Borrower Requirements); (ii) Compliance with national approval and monitoring /enforcement procedures; (iii) National grievance management procedures as applicable to projects; (v) Civil Society Organisation (CSO) capacity to positively influence public decision making; (vi) Access to information – E&S reports; (vii) Existence of E&S training centers, reference laboratories for environmental analysis; (viii) Existence of recognized corps of ESA Professionals (Chartered Professional Institutes); and (ix) Environmental Justice Mechanism.

Table 1: Assessment of the Country's E&S System Against Applicable Operational Safeguards of the Bank's ISS

Legend for ESSA

	The National E&S System is fully compliant with the Bank's ISS requirements, as evidenced by robust practices
	The National E&S System is moderately effective, but it does not fully comply with the Bank's ISS requirements, as evidenced by current practices.
	The National E&S System is deficient in comparison with the Bank's ISS requirements, as evidenced by current practices.

Obligations of the Borrower (Reference for analysis)	National Legal Framework	Policies, Strategies and procedures to support the legal framework	National /Subnational Practices	Example of Weaknesses and Specific Elements Proven to Strengthen
Environmental and Social Operational Safeguards 1: Environmental and Social Risk and Impact Assessment and Management Objectives The aim of this overarching Operational Safeguard (OS), together with the OSs that complement it, is to maintain environmental and social (E&S) considerations, including those related to climate change vulnerability, into Bank operations and thereby contribute to sustainable development in the continent. General Requirements				The Social Impact Assessment Guideline and the National Standards for Social Impact Assessment in Nigeria (2017) need to be updated to (sufficiently) address critical issues such as: <ul style="list-style-type: none"> • lack of coverage of sexual exploitation, abuse and harassment (SEAH) and gender-based violence (GBV) risks, • Social risks arising from climate vulnerability and climate-induced hazards • lack of detailed guidance on estimation of compensation at full replacement cost for affect assets and institutional coordination for determining adequate compensation regime for Project Affected People, • lack of explicit guidelines on the reporting structures for a Resettlement Action Plan (RAP), Livelihood Restoration Plan (LRP), and Stakeholder Engagement Plan (SEP), and Community Development Plan (CDP)

Obligations of the Borrower (Reference for analysis)	National Legal Framework	Policies, Strategies and procedures to support the legal framework	National /Subnational Practices	Example of Weaknesses and Specific Elements Proven to Strengthen
<p>The Borrower shall assess, manage, and monitor the E&S risks and impacts of the project throughout the project life cycle so as to meet the requirements of the OSs in a manner and within a time frame acceptable to the Bank.</p> <p>The Borrower shall:</p> <ol style="list-style-type: none"> conduct an ESA of the proposed project, including stakeholder engagement; undertake stakeholder engagement and disclose appropriate information in accordance with OS10; develop an Environmental and Social Plan (ESMP) and implement all measures and actions set out in the financing agreement including the ESMP; and conduct monitoring and reporting on the E&S performance of the project against the OSs 				<ul style="list-style-type: none"> Timeline threshold for response to grievance submitted (60 days) is somewhat long and could be reduced to 30 days to ensure timeliness of grievance resolution. <p>Some other areas for improvement consist of the following:</p> <ul style="list-style-type: none"> ESIA Technical Expertise and Capacity Constraints: The quality of EIAs in terms of technical depth and procedural fidelity has been observed to be at variance with international best practice due to inadequate skilled professionals and expertise, worsened by migration abroad for better opportunities. Political & Systemic Interference: Political interest of key actors in Nigeria has had ripple effects across all sectors including the entrenching a new cultural of bias in EIA process and assessment. Inadequate (Lack of) Robust Strategic Environmental and Social Assessment (SESA) and Cumulative Impact Assessment (CIA): Given Nigeria's commitment to bridging infrastructure gap and accelerating energy access to unserved and underserved populations, a number of policies, programmes and projects have been rolled out without proper consideration of the strategic and cumulative impacts of such developments. The transition from fossil fuel to cleaner energy alternatives has been projected to create at least 100,000 jobs according to the Energy Transition Plan (2022); however, there have been no national and subnational assessment to ascertain the magnitude of impact and the potential green jobs that will be unlocked. Ensuring that Cumulative Impact Assessment of projects is thoroughly done is of great concern to regulators, stakeholders and consultants. Data Deficiency and Integrity: One of the major issues with the quality of EIAs is data gaps due to unavailability in the required format, lack of access to women in project communities due to cultural and religious issues, restriction of access to communities due to heightened security risks, improperly calibrated equipment, mishandling of media samples and other human-induced errors, among others. The difficulty in obtaining often undermines the core objectives of establishing baseline environmental and social conditions against which project impacts may be evaluated in an ongoing manner.

Obligations of the Borrower (Reference for analysis)	National Legal Framework	Policies, Strategies and procedures to support the legal framework	National /Subnational Practices	Example of Weaknesses and Specific Elements Proven to Strengthen
				<ul style="list-style-type: none"> • Financial and Budgetary Constraints: Funding is a critical element that underpins the degree of effectiveness and efficiency of regulatory authorities in enforcing the provisions of the EIA Act. Owing to limited financial resources, the Federal Ministry of Environment (FMEnv. and NESREA and other State Ministries of Environment are unable to deploy their full supervisory strength towards ensuring proper environmental stewardship and compliance. This also has implication for attracting and retaining talented workforce that will deepen institutional knowledge and drive best practices across various sectors. • Bureaucratic Legislative Process: A revised EIA Act has been presented to the national legislature but it has yet to be passed into Law for more than a decade which has impeded progress with respect to enhancing sections of the extant legislation that should have been replaced with more relevant guidance that are necessitated by emerging best practices and new global standards, principles and frameworks. This delay has had serious implications for enhancing enforcement and compliance mechanisms. • Review and update of the EIA Sectoral Guidelines for Agriculture and Rural Development, 2013: Based on a comprehensive search of publicly accessible data repositories, the EIA Sectoral Guidelines for Agriculture and Rural Development, 2013 is not available in the public domain and could have resulted in the lack of consideration of EIA requirements in the Guidelines for the Establishment of Fertilizer Manufacturing and Blending Plant (accessible here: https://nfmp.gov.ng/guidelines). The Federal Ministry of Environment should update the Guideline to raise awareness about environmental and social risks associated with the agriculture sector and key mechanisms for mitigating the negative impacts on people and the environment. Key messages from the guidelines should be translated into major local languages and pidgin to raise awareness among people with no formal education and those with primary to secondary education.
Environmental and Social Operational Safeguard 2: Labour and Working Conditions Objectives of OS 2 The objectives of OS2 are as follows: • To protect workers' rights.				Supply chain risks in the Agriculture Sector: The nature and magnitude of environmental and social risks across value chains in the agriculture sector is often insufficiently factored into risk assessment of programs and projects. Therefore, a lifecycle and value chain lens should increasingly be applied in risk assessment to ensure full coverage of the spectrum risks associated with any project or program.

Obligations of the Borrower (Reference for analysis)	National Legal Framework	Policies, Strategies and procedures to support the legal framework	National /Subnational Practices	Example of Weaknesses and Specific Elements Proven to Strengthen
<ul style="list-style-type: none"> • To promote safety and health in the workplace. • To promote the fair treatment, non-discrimination, and equal opportunity of project workers. • To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this OS) and migrant workers, contracted workers, community workers, and primary supply workers, as appropriate. • To prevent the use of all forms of forced labour and child labour. 				<p>Whereas child labour and forced labour are often associated with the production of cassava, cocoa and livestock herding. These issues continue to prevail within the agriculture sector and may expose children to hazardous environment where agrochemicals are used to improve productivity.</p> <p>Although Nigeria has established mechanisms for addressing child and forced labour, a number of challenges still persist in the form of insufficient funding (hindering effective enforcement and implementation), informal economy (many children work in unregulated sectors, making protection and enforcement challenging), and regional disparities in domesticating (variations in laws and enforcement across states, with Kano state not prohibiting the use of children in illicit activities).</p> <p>In 2023, 733 labor inspectors conducted 17,068 worksite inspections, finding 453 child labor violations. The outcome of the investigations into suspected cases of the worst forms of child labor could not be confirmed even when prosecutions were initiated, or perpetrators were convicted¹¹.</p> <p>Overall, Nigeria's National Action Plan for the Elimination of Child Labor and Its Worst Forms (2021-2025) demonstrates the government's commitment to eliminating child labor; however, effective implementation to address existing challenges will be integral to achieving its goals.</p> <p>Inadequate Extension Services Capacity: Based on interview granted by top government official¹² and research findings, Nigeria is struggling with chronic deficiencies in extension services capacity. According to Nigeria Country Report 2020 issued by the African Seed Access Index¹³, the number of farmers served by extension officer is in the ratio 7,500:1, suggesting acute shortage of capacity. This estimate is even considered conservative due to the paucity of data. Without adequate workforce, it is difficult to train farmers on different environmental and social risks that could be exposed to through various agricultural practices, including the use of agrochemicals. The government needs to work with local and international partners</p>

¹¹ <https://www.dol.gov/agencies/ilab/resources/reports/child-labor/nigeria>

¹² <https://businessday.ng/agriculture/article/how-ineffective-agric-extension-service-undermines-nigerias-food-security/>

¹³ <https://ageconsearch.umn.edu/record/317016/files/Nigeria%20Country%20Report%202020.pdf>

Obligations of the Borrower (Reference for analysis)	National Legal Framework	Policies, Strategies and procedures to support the legal framework	National /Subnational Practices	Example of Weaknesses and Specific Elements Proven to Strengthen
				to bridge this human capital gap in order to effectively mainstream environmental and social safeguards at the subnational levels.
<p>Environmental and Social Operational Safeguard 3: Resources Efficiency and Pollution Prevention and Management</p> <p>OS3 sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life cycle in a manner consistent with Good International Industry Practice (GIIP). Throughout the different phases of the project's life cycle, i.e. planning and design, construction, commissioning, operations, and decommissioning, the Borrower is required to assess and evaluate resource efficiency and pollution-prevention techniques and implement them, taking into consideration their technical and financial feasibility and cost-effectiveness.</p> <p>As part of project preparation, in the Environmental and Social Assessment (ESA), the Borrower evaluates the potential impacts of pollutant discharges and resulting ambient concentrations to the environment, considering potential receptors, and assesses risks and impacts related to the following: Environmental/ecological carrying capacity, Ecosystem services, Land use (current and future), soils, and agriculture, Surrounding communities and poverty conditions, Local, regional, and transboundary potential impacts, Proximity to environmentally sensitive areas and populations, Proximity to surface and groundwater sources, Current and future water body use, and Potential cumulative impacts.</p> <p>The objectives of OS3 are as follows:</p> <ul style="list-style-type: none"> • To promote the sustainable use of resources, including energy, water, and raw materials. • To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities. • To avoid or minimize project-related emissions of short and long-lived climate pollutants. 				<p>NESREA should ensure timely review of key guideline documents whose period of effectiveness has passed and commence preparation for the review of guidelines whose effectiveness will lapse in the next one year. These include:</p> <ul style="list-style-type: none"> • GUIDELINES FOR ISSUANCE OF PERMIT FOR CLEARANCE OF IMPORTED RESTRICTED AND AGROCHEMICALS (DUE FOR REVIEW SINCE 2023) • GUIDELINES FOR REGISTRATION OF IMPORTED PESTICIDES IN NIGERIA (DUE FOR REVIEW IN 2026) • GUIDELINES FOR REGISTRATION OF PESTICIDES MADE IN NIGERIA (DUE FOR REVIEW IN 2026) • GUIDELINES FOR LISTING AS PESTICIDES, AGROCHEMICALS, FERTILIZERS, BIO-PESTICIDES AND BIO-FERTILIZERS MARKETERS (RENEWAL) (DUE FOR REVIEW IN 2026) • GUIDELINES FOR ISSUANCE OF PERMIT TO IMPORT BULK PESTICIDES, AGROCHEMICALS AND FERTILIZERS (NEW APPLICANTS) (DUE FOR REVIEW IN 2026) • GUIDELINES FOR ISSUANCE OF PERMIT TO IMPORT BULK PESTICIDES, AGROCHEMICALS AND FERTILIZERS (RENEWAL) (DUE FOR REVIEW IN 2026) • GUIDELINES FOR LISTING AS PESTICIDES, AGROCHEMICALS, FERTILIZERS, BIO-PESTICIDES AND BIO-FERTILIZERS MARKETERS (RENEWAL) (DUE FOR REVIEW IN 2026) • GUIDELINES FOR CLEARING OF IMPORTED GENERAL CHEMICALS, AGROCHEMICALS AND RAW MATERIALS AT PORTS OF ENTRY IN NIGERIA (DUE FOR REVIEW IN 2026) <p>Other areas for improvement have been covered under OS 1 above.</p>

Obligations of the Borrower (Reference for analysis)	National Legal Framework	Policies, Strategies and procedures to support the legal framework	National /Subnational Practices	Example of Weaknesses and Specific Elements Proven to Strengthen
<ul style="list-style-type: none"> • To avoid or minimize generation of hazardous and non-hazardous waste. • To minimize and manage the risks and impacts associated with pesticide use. 				
<p>Environmental and Social Operational Safeguard 4: Community Health, Safety and Security</p> <p>OS4 addresses the health, safety, and security risks to and impacts on project-affected communities and the corresponding responsibility of the Borrower to avoid or minimize them, with particular attention to people who, due to their particular circumstances, may be vulnerable.</p> <p>Objectives</p> <p>The objectives of OS4 are as follows:</p> <ul style="list-style-type: none"> • To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project or operation lifecycle from both routine and non-routine circumstances. • To help promote public health and safety across the project's area of influence by, inter alia, promoting and supporting programmes that aim at preventing the spread of major communicable diseases. • To promote quality and safety, and considerations relating to climate change in the design and construction of infrastructure, including dams. • To avoid or minimize community exposure to project-related traffic and road safety risks, diseases, and hazardous materials. • To ensure that effective measures to address emergency events are in place. • To ensure that the safeguarding of personnel and property through the provision of public or private security is carried out in a manner that avoids or minimizes risks to the project- 				<p>Poor Handling of Hazardous Materials by Farmers: Amusat et al. (2023)¹⁴ reported that many farmers wash and use containers of pesticides for various domestic activities including storing water, performing ablution and carrying food, resulting in exposure to serious health impacts. A probable reason for this practice is lack of awareness of farmers of the dangers of these hazardous agrochemical containers, which needs to be factored into program interventions where Extension Agents provide iterative training to farmers on the safe storage and handling of agrochemicals. Furthermore, a Take-back Voucher System may be deployed to retrieve used agrochemical containers from categories of beneficiaries that are susceptible to exposure, for example, older men and women, people with poor vision, among others. Promoting public information and education on hazardous materials management is crucial to preventing and reducing adverse effects of chemicals and pesticides.</p> <p>According to Ugbelu (2022)¹⁵, in a study involving 5,800 farmers in Nsukka Agricultural Zone, farmers reported various health impacts resulting from the use of agrochemicals including but not limited to:</p> <ul style="list-style-type: none"> • Chest Pain • Eye Irritation • Headache • Skin rashes/itching • Excessive salivation/vomiting • Difficulty in breathing • Dizziness • Coughing • Physical weakness • Throat and Nose irritation

¹⁴ https://www.mediresonline.org/secure/uploads/articles/1689329233Overview_of_Pesticide_Usage.pdf

¹⁵ <https://jfsr.afass.org.ng/index.php/JFSR/article/download/6/5>

Obligations of the Borrower (Reference for analysis)	National Legal Framework	Policies, Strategies and procedures to support the legal framework	National /Subnational Practices	Example of Weaknesses and Specific Elements Proven to Strengthen
<p>affected communities and in a manner consistent with international human rights standards and principles.</p> <ul style="list-style-type: none"> • To help prevent against sexual exploitation, abuse and sexual harassment (SEAH) of members of the community by project workers. 				<p>Analysis of data indicated that there is a direct correlation between the level of exposure of farmers and their level of education – farmers with only primary education experienced more severe exposure than their counterparts with at least secondary level education. The study notes that although farmers may be generally knowledgeable about the harmful effects of agrochemicals, they often do not adhere to the use of personal protective equipment (PPE) requirements when applying and handling hazardous substances and waste streams.</p> <p>It is crucial to enhance awareness among industry associations, farmers' cooperatives, and other stakeholders on the proper storage, use, transport, and handling of agrochemicals and hazardous materials. Partnerships and collaboration among key government institutions and agencies, government and private sectors and national and subnational institutions should be fostered in order drive enhanced awareness among farmers and improve adherence to guidelines on the application of agrochemical.</p>
<p>Environmental and Social Operational Safeguard 6: Habitat and Biodiversity Conservation, and Sustainable Management of Living Natural Resources</p> <p>This Environmental and Social Operational Safeguard (OS) outlines the requirements for the Borrower to:</p> <p>(i) identify and implement opportunities to conserve and sustainably use biodiversity and natural habitats; and</p> <p>(ii) observe, implement, and respond to requirements for the conservation and sustainable management of priority ecosystem services.</p> <p>Objectives</p> <p>The objectives of OS6 are as follows:</p> <ul style="list-style-type: none"> • To protect and conserve biodiversity and different types of habitats. • To apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity, with the aim of conserving biological diversity and ecosystem integrity. • To reinstate or restore biodiversity informed by the mitigation hierarchy, including where some impacts are 				<p>Paucity of Long-term Pollution Monitoring Studies: Inadequate research on the effect of agrochemicals on the environment limits the availability of ample empirical findings to link excessive and improper use of agrochemicals to environmental pollution of water courses and adverse health effects on farmers. Thus far, there is no publicly available record of major long-term study (at least 5-10 years) focused on ongoing monitoring of selected rivers and soil within agroecological zones where agrochemicals have been used on farmlands. The availability of such studies would have helped in ascertaining, beyond theory-based analogies, specific ecological transformations that have occurred in different agroecological zones resulting from poor agrochemical applications.</p>

Obligations of the Borrower (Reference for analysis)	National Legal Framework	Policies, Strategies and procedures to support the legal framework	National /Subnational Practices	Example of Weaknesses and Specific Elements Proven to Strengthen
<p>unavoidable, through implementing biodiversity offsets to achieve “no net loss but net gain” of biodiversity.</p> <ul style="list-style-type: none"> • To promote the sustainable management of living natural resources. • To support livelihoods of local communities, including vulnerable groups, and inclusive economic development through the adoption of practices that integrate conservation needs and development priorities. • To sustain the availability and productivity of ecosystem services to maintain benefits for the affected communities and sustain project performance. • To integrate natural resources effectively into sustainable economic development and protect the vital local and global environmental services and the values of natural resources. 				
<p>Environmental and Social Operational Safeguard 7: Vulnerable Groups</p> <p>Vulnerable individuals and groups: (i) are usually exposed to several risks and adverse impacts at once; (ii) are more sensitive to these risks and impacts, having been subject to pre-existing discrimination, financial, socio-economic, cultural, and/or gender inequalities, due to their geographical location, their dependence on the environment, and/or limited access to justice and decision-making; and (iii) have a weaker adaptive capacity.</p> <p>Objectives</p> <p>The objectives of OS7 are as follows:</p> <ul style="list-style-type: none"> • To ensure that vulnerable groups and individuals are identified as early as possible in Bank Group operations and that engagement is meaningful, taking into account individuals’ and communities’ specificities, and delivered in an appropriate form. <p>To affirm, respect, and protect the rights and interests of vulnerable individuals and groups throughout the life cycle of the project or investment.</p> <ul style="list-style-type: none"> • To recognize, respect, and preserve the culture, knowledge, and practices of highly vulnerable cultural groups and 				<p>Enhanced Protection of Vulnerable Population: As highlighted under OS 1, the areas for improvement of the Social Impact Assessment Guideline and the National Standards for Social Impact Assessment in Nigeria (2017) will address issues relating to protecting vulnerable people.</p> <p>Gender-responsive Approach: The African Seed Access Index (TASAI) Nigeria Country Report (2020) reported the gender-related findings of a survey involving 56 seed companies with a total of 127 management positions including positions such as managing director, assistant managing director, farm manager, finance manager, production/operations manager, and marketing manager. The representation of women in management positions among the 56 seed companies range from 4% to 14%, demonstrating women’s participation as owners and/or managers of seed businesses in Nigeria is low. When a value chain lens is applied, a similar trend will likely persist all through.</p> <p>The Federal Ministry of Agriculture and Food Security should enhance the implementation of The National Gender Policy on Agriculture by developing Program-specific Gender Action Plan to ensure adequate mainstreaming of gender-lens in all projects and programmes implemented by the Ministry by coordinating jointly with the Ministry of Women Affairs and Social Development.</p> <p>There is limited capacity in Ministry of Women Affairs and Social Development to tackle the issues of SEA/SH and other issues relating to gender and youths which can</p>

Obligations of the Borrower (Reference for analysis)	National Legal Framework	Policies, Strategies and procedures to support the legal framework	National /Subnational Practices	Example of Weaknesses and Specific Elements Proven to Strengthen
<p>minorities including indigenous peoples, and to provide them with an opportunity to adapt to changing conditions that could arise due to project activities in a manner and in a time frame acceptable to them.</p> <ul style="list-style-type: none"> • To adopt a gender-responsive approach to the management of E&S impacts, which takes into account the rights and interests of women and girls, men, and boys, including paying specific attention to the differentiated burden of impacts that women and girls might face. • To identify and avoid adverse impacts of Bank operations on the lives and livelihoods of vulnerable individuals and groups, including women and girls, and HVRM including indigenous peoples. Where avoidance is not feasible, reduce, minimize, mitigate, compensate or effectively remedy impacts. • To obtain the Free, Prior, and Informed Consent (FPIC) of affected HVRM in the three circumstances described in para. 36 of this OS. • To promote development benefits and opportunities for vulnerable groups, including women and girls, minorities and HVRM in a manner that is accessible, culturally appropriate, and inclusive. • To improve project design and promote local support by establishing and maintaining an ongoing relationship based on meaningful consultation with the vulnerable groups affected by a project, set of activities or initiatives throughout the project lifecycle. 				<p>limit their access to the program. State Governments should organize regular enlightenment programmes for the public and capacity building programs for staff of gender/women ministries.</p> <p>The Violence Against Persons (Prohibition) [VAPP] Act is a federal law and most of the States have not domesticated it due to socio-cultural dissention, therefore, the VAPPA Act suffers weak enforcement. The Federal Government should drive further engagement with State Governments to encourage adoption and domestication of the Act across the country.</p>
<p>Environmental and Social Operational Safeguard 10: Stakeholder Engagement and Information Disclosure</p> <p>OS10 applies to all of the Bank Group's funded operations. The Borrower shall engage with stakeholders as an integral part of the project's ESA and project design and implementation, as outlined in OS1</p> <p>Objectives</p> <p>The objectives of OS10 are as follows:</p>				<p>Inadequate Stakeholder Participation in the EIA Review Process: For reasons, including economic, administrative and political pressure, it has been observed that stakeholders (non-governmental organisations (NGOs), community-based organisations (CBOs), faith-based organisations (FBO) and the General Public) have increasingly exhibited apathy towards the review and provision of comments on Draft EIA reports during Public Disclosure of the document. This trend could be attributable to weak feedback mechanism that provides assurance to stakeholders that their comments have been adequately incorporated in the project design and implementation. Stakeholder Engagement should commence early on from program or project conceptualization and design and ongoingly throughout the lifecycle. It is important for government agencies to overcome silo-based tendencies</p>

Obligations of the Borrower (Reference for analysis)	National Legal Framework	Policies, Strategies and procedures to support the legal framework	National /Subnational Practices	Example of Weaknesses and Specific Elements Proven to Strengthen
<ul style="list-style-type: none"> • To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders, and build and maintain a constructive relationship and channels of communication with them, in particular project-affected parties. • To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and E&S performance. • To promote and provide the means for safe, effective, and inclusive engagement with project affected parties, inclusive of women's perspectives, in an equitable manner, and vulnerable groups, in a manner free of reprisal, throughout the project life cycle on issues that could potentially affect them. • To enhance project benefits and mitigate harm to local communities. • To ensure that appropriate project information on E&S risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format. • To provide project-affected parties with accessible and inclusive means to provide input, raise issues, questions, proposals, concerns, and grievances, and allow Borrowers to respond to and manage such grievances. • To promote development benefits and opportunities for project-affected communities, taking into account the needs of women, including vulnerable groups, in a manner that is accessible, equitable, culturally appropriate, and inclusive. 				<p>by exchanging information and deepening meaningful collaboration, leveraging one another's complementary strengths to overcome barriers and mitigate program/project risks.</p> <p>Digitization and Digitalization of EIA Process through Enhanced Technology Integration: There remains significant opportunities for various regulatory agencies to deepen technology integration in their operations. Whereas there have been some notable improvements demonstrated by FMEnv and NESREA in making guidelines, regulations and reports publicly available through enhanced disclosure practices, there are ample opportunities in leveraging Artificial Intelligence in strengthening capacity for driving improved compliance and building capacity of stakeholders. In certain instances, NESREA's website is inaccessible due to technical issues, which undermines accessibility to information in a timely manner. In addition, whereas the FMEnv discloses ESIA and RAP reports on its website, the webpage could be designed to be more interaction and built as a database with a search bar for accessing historical and recent reports.</p>

From the foregoing, it is evident that Nigeria has established a fairly robust architecture for mainstreaming environmental, social, climate and gender considerations in (agricultural) projects. However, despite the rich structural, institutional and legal frameworks, the effectiveness and efficiency of policy instruments, law enforcement and governing institutions remain subpar due to limited technological, technical, financial, and institutional capacity and resources. The inevitable consequence of this asymmetry in Policies and Praxis is evident in less impressive results recorded by programmes that were supposed to achieve wide-ranging transformational effects. In recent years, a number of initiatives have been implemented to address these challenges, and some modest outcomes have been realised; still, there is ample opportunity to further strengthen the country's system in order to fully align with the Bank's ISS requirements. While the next chapter focuses on Program-related capacity assessment, the one that follows it presents some recommendations for enhancing the country and Program's environmental and social systems.

5. ASSESSMENT OF NATIONAL AGRICULTURE GROWTH SCHEME SECRETARIAT ENVIRONMENTAL & SOCIAL CAPACITY AND PERFORMANCE

The NAGS operation financed under the Africa Emergency Food Production Facility (AEFPF) was used as a pilot to the delivering certified seeds of climate-adapted crop varieties, mineral fertilizers and quality agricultural extension services to boost food production and productivity using an E-voucher system which will be put to scale with the proposed operation. The operation which is a Program Based Operation supported the agricultural sector of the country to among others, roll out an ICT based system that was used to deliver growth enhancement technologies comprising of climate proof, nutrition rich seeds and planting materials for wheat, rice, maize, sorghum, millet, soybean and cassava; quality tested locally manufactured / blended fertilizer; and other agro-chemicals to 634,043 farmers using about 600 last mile agro-inputs dealers. Through the implementation of the NAGS-AP the wheat seed in Nigeria has been improved through the importation of 6,750mt of heat tolerant improved seeds from Mexico that is adaptable to Nigeria climatic conditions; revamped wheat production in Nigeria and achieved about 300% in harvested area within its first year of implementation. This contributed to an estimated achievement of 10% wheat self-sufficiency in 2024 from less than 3% in 2023; and is expected to improve to 20% in 2025.

The impact of the NAGS operation was monitored and assessed independently throughout its implementation through: i) Farmers Surveys conducted by the National Agricultural Extension and Research Liaison Services (NAERLS); and ii) remote sensing analysis conducted. The proposed intervention will build on the established protocols and lessons of NAGS-AP and expand the support to at least 5 million farmers. The technology package for farmers will be built on a 0.5Ha unit of analysis and farmers will graduate from the support after receiving the support twice, with 50% contribution for inputs in the first time and 25% in the second.

Importantly, the NAGS-AP implementation has led to the setting up of the NAGS Secretariat and the Federal Ministry of Agriculture and Food Security with a full complement of technical, fiduciary, safeguard and support staffs to implement the NAGS programme nationwide. It has also built the capacity and interest of private sector agribusinesses in seed production, agro-inputs dealership and fertilizer manufacturing; and established agro-dealership networks with nodes at farm clusters. The private sector involvement in the production and delivery of inputs to farmers crowds in investment in the sector and this further engender sustainability of the activities, as the agro-input dealers and others will build capacity to operate within the farming communities. Technology uptake by farmers especially for production of wheat has been accelerated and offtake arrangements are being enhanced and expanded. The main fulcrum for the success of the implementation of these activities has been the strong political will and interest at the national as well as the state levels to ensure food security in the country.

Additionally, NAGS-AP has reformed, strengthened and enhanced coordination of the FMAFS and other actors in the crops production ecosystem including seed companies and agro-input dealers. These were achieved through the implementation of the following policy actions in the Project: (i) NATIP approved by the Federal Executive Council (FEC) and accessible in the FMARD website; (ii) Development of the NATIP Investment Plan; (iii) Establishment of NATIP Committees. (iv) Establishment of NAGS Implementation Secretariat;(v) Reactivation of Agro-Pocket; (vi) Finalization and Dissemination of National Strategy for Wheat Self-Sufficiency in Nigeria; and (vii) Completion of the new National Seed Policy. These actions have led to the re-establishment of an institution and standard operating practices (SOP) for delivery of quality inputs to real farmers modelled around the erstwhile e-wallet system which was used in Nigeria between 2011 and 2015.

Having established the administrative and governance framework underpinning the NAGS AP project implementation for the Phase 1, the assessment of the Implementing Agency's E&S capacity focuses on three critical aspects including administrative and governance processes, technical expertise and staff adequacy, sufficiency of financial resources and regulatory compliance.

Budgetary Allocation and Approval Process. Although the budget captured resources for the execution of E&S-related activities, the E&S Officers could not undertake field supervision consistently due to a bureaucratic approval process, which requires sign-off of the Permanent Secretary of the Ministry of Agriculture and Food Security. The delay in securing approval often hinders the team's response to urgent matters requiring immediate attention. Based on the periodic report from NAGS Phase 1, a major constraint is the delay in the approval of the contract for the preparation of an Integrated Pest Management Plan (IPMP). The IPMP is currently under review by the Bank.

Sufficiency of Financial Resources. In line with the Bank's E&S reporting requirement, NAGS Phase 1 is expected to conduct an Environmental and Social Performance Audit (ESPA) on an annual basis and submit the report to the Bank for review and clearance. As highlighted in the Q4 2024 Report, the Program's E&S budget (N60,000,000) was grossly insufficient to cover all the activities to be undertaken all through the 36 States and the Federal Capital Territory. Therefore, the ESPA was not prepared and submitted to the Bank in line with the provisions of the Loan Agreement.

E&S Technical Expertise and Staff Adequacy. For the implementation of the National Agricultural Growth Scheme's Phase 1, the Project Implementation Unit (PIU) is staffed with a permanent E&S specialist, seconded by the Federal Ministry of Environment. The program's E&S specialist is supported by an E&S Officer from the Agricultural Transformation Agenda Support Program Phase 1 on a part-time basis. The staffing arrangement suggests that there was no clear plan for provisioning of sub-national E&S officers who should work collaboratively with the national counterparts to ensure adequate mainstreaming of safeguards requirements across all the States and the FCT. Additionally, the E&S Safeguards team did not include a gender specialist who should drive the incorporation of gender lens in the program implementation. The lack of subnational E&S safeguards officers was evident from a number of observations documented from field supervision including but not limited to the following:

- Agro-dealers did not enforce the use of personal protective equipment (PPEs) to minimize workers' exposure to hazardous materials and inhalation of organic dusts,
- Improper storage facilities for fertilizers. Provision for wooden pallets was either non-existent or was limited, as fertilizer bags were seen stored on bare floors,
- Improper arrangements for distribution of fertilizers at redemption centers which could potentially result in occupational health and safety hazards,
- Although the NAGS-AP secretariat developed an Agricultural Input Distribution Catalogue which highlights measures for safe and environment-friendly operations, there was no evidence of proper implementation by Agro-dealers

Regulatory Compliance. The program facilitated the issuance of applicable permits and licenses to the accredited agro-dealers by the relevant national authorities. Examples of permits and licenses issued are National Seed Council of Nigeria for seeds certification, Farm Input Support Services (FISS) for fertilizer and agro-

chemical permits for importers, manufacturer's permit, and certificates of lending among others. Obtaining relevant regulatory permits and licenses was a pre-requisite for engaging any agro-dealer.

Based on the experience from the National Agricultural Growth Scheme's Phase 1, the Project Implementing Unit (PIU) demonstrated limited E&S capacity; therefore, it is crucial to ascertain the state-level safeguards implementation capacity to ensure adequate mainstreaming of environmental, social, gender and climate lens in the delivery programme.

6. ENVIRONMENTAL AND SOCIAL SAFEGUARDS SYSTEM STRENGTHENING ACTION PLAN

This section presents a summary of the main actions to be undertaken during the program implementation. The recommended actions cover aspects requiring NAGS Secretariat to improve performance of their system within its defined administrative procedures. It also includes mitigation measures to address specific environmental, social, climate and gender impacts, or organizational measures to improve the overall effectiveness of the implementation. The recommendations are presented in a tabular format showing the detailed planned program of action, allocation of institutional responsibilities, timing, indicators of achievement of actions and estimated budget. The identified areas for improvement, capacity building needs and defined actions are to be implemented as disbursements linked indicators (DLI) or to be integrated into the program action plan.

Table 2: Program's Environmental and Social Safeguards System Strengthening Action Plan

#	Issue	Recommended Action	Institutional Responsibility	Timeline	Deliverable	Estimated Budget
1	Organisational effectiveness A. Insufficient Budgetary Allocation for E&S Supervision Mission. Although the budget captured resources for the execution of E&S-related activities, the E&S Officers could not undertake field supervision consistently due to a bureaucratic approval process, which requires sign-off of the Permanent Secretary of the Ministry of Agriculture and Food Security.	<p>Allocate sufficient budget for all Program-related E&S activities, including periodic E&S Supervision Mission.</p> <p>Establish a Delegation of Authority Matrix (DAM) that outlines an agile governance structure for Program Management. The DAM should state who has the authority to make specific decisions or approve certain actions based on specific guidelines to streamlining decision-making processes and ensuring accountability. The DAM should be designed to achieve sound and agile decision-making that addresses barriers of approval delay for critical operations.</p>	<p>FMAFS</p> <p>NAGS -AP 2.0 Secretariat</p>	Before commencement of Program activities	<p>Documented E&S Budget for Program Implementation</p> <p>Delegation of Authority Matrix (DAM) Chart and associated guidelines</p> <p>Annual Work Plan, including E&S implementation plan</p> <p>Periodic E&S Implementation Report submitted to and cleared by the Bank</p>	(N) 300,000,000 (This captures both Monitoring & Supervision exercises)
	B. Non-submission of Annual Environmental and Social Audit Report. In line with the Bank's E&S reporting requirement, NAGS Phase 1 is expected to conduct an Environmental and Social Performance Audit (ESPA) on an annual basis and submit the report to the Bank for review and clearance. As highlighted in the	Prepare and submit Annual Environmental and Social Audit Report.	NAGS-AP 2.0 Secretariat	Annually after the commencement of Program activities	<p>TOR for Annual ESPA submitted to and cleared by the Bank</p> <p>Annual Environmental and Social Audit Report submitted to the Bank</p>	(N) 270,000,000

#	Issue	Recommended Action	Institutional Responsibility	Timeline	Deliverable	Estimated Budget
	Q4 2024 Report, the Program's E&S budget (N60,000,000) was grossly insufficient to cover all the activities to be undertaken all through the 36 States and the Federal Capital Territory. Therefore, the ESPA was not prepared and submitted to the Bank in line with the provisions of the Financing Agreement.					
	<p>C. E&S Technical Expertise and Staff Adequacy. For the implementation of the National Agricultural Growth Scheme's Phase 1, the Project Implementation Unit (PIU) is staffed with a permanent E&S specialist, seconded by the Federal Ministry of Environment. The program's E&S specialist is supported by an E&S Officer from the Agricultural Transformation Agenda Support Program Phase 1 on a part-time basis.</p> <p>The staffing arrangement suggests that there was no clear plan for provisioning of sub-national E&S officers who should work collaboratively with the national counterparts to ensure adequate mainstreaming of safeguards requirements across all the States and the FCT. Additionally, the E&S Safeguards team did not include a gender specialist who should drive the incorporation of gender lens in the program implementation.</p>	<p>At the national level, recruit Environmental and Climate Safeguards Specialist (1); Social Safeguards Specialist (1) and Gender Specialist (1) on a full-time basis to ensure adequate capacity for mainstreaming climate, environment, social and gender lens in Program implementation.</p> <p>At subnational levels, make provisions for Environmental and Social Safeguards Specialist (1) and Gender Specialist (1) either on a permanent basis to ensure adequate mainstreaming of mainstreaming climate, environment, social and gender lens in Program implementation across the 36 States and the FCT. For the purpose of reporting, regional coordinators may be appointed to collate reports</p>	<p>FMAFS</p> <p>State Ministries of Agriculture and Rural Development</p> <p>NAGS -AP 2.0 Secretariat</p> <p>AfDB (validation and support, if necessary)</p>	<p>Before commencement of Program activities</p>	<p>CVs of Environmental and Climate Safeguards Specialist; Social Safeguards Specialist and Gender Specialist at the national level</p> <p>Confirmation of State-level E&S Capacity in Quarterly E&S Implementation Report.</p>	(N) 35,000,000
2	<p>Environmental Management</p> <p>Delay in Preparation of Integrated Pest Management Plan (IPMP): The delay in securing approval often hinders the team's response to urgent matters requiring immediate attention. Based on the periodic report from NAGS Phase 1, a major constraint is the delay in the approval of the contract for the preparation of an Integrated Pest Management Plan (IPMP). The IPMP is currently under preparation by the appointed consultant.</p>	Finalize and implement the Integrated Pest Management Plan (IPMP) for Program activities at the national and subnational levels.	<p>FMAFS</p> <p>State Ministries of Agriculture and Rural Development</p> <p>NAGS -AP 2.0 Secretariat</p>	<p>Before commencement of Program activities</p> <p>Continuous throughout the Program lifecycle.</p>	<p>Final IPMP submitted to and cleared by the Bank.</p> <p>Quarterly IPMP implementation report submitted to the Bank</p> <p>Training records and feedback from participants</p>	Captured under Monitoring & Supervision.

#	Issue	Recommended Action	Institutional Responsibility	Timeline	Deliverable	Estimated Budget
					at the national and subnational levels.	
3	Social - Grievance Redress Mechanism No records of Grievance Redress Mechanism for NAGS-AP Phase 1. This is because there are no regional level E&S officers as well as lack of going on monitoring duties by the E&S officers on account of limited financial resources.	Develop and implement a robust Program-specific Grievance Redress Mechanism that is cascaded across the 36 States and the FCT.	FMAFS State Ministries of Agriculture and Rural Development NAGS -AP 2.0 Secretariat	Before commencement of Program activities	Program-specific Grievance Redress Mechanism submitted to and cleared by the Bank. Periodic reports on GRM implementation	(N) 45,000,000
4	Climate Change Preliminary screening under the Bank's Climate Safeguards System has classified this Program as a Category 2 operation. This reflects its moderate vulnerability to climate risks—such as intensifying drought conditions in the northern states and increased precipitation along with sea level rise in the southern and coastal areas.	Develop a Program-specific Climate Adaptation Strategies, that are fully aligned with Nigeria's National Adaptation Plan and the National Climate Policy such as the implementation of Climate Smart Agriculture (CSA), the Blue Economy and nature-based approaches.	FMAFS State Ministries of Agriculture and Rural Development NAGS -AP 2.0 Secretariat AfDB (validation and support, if necessary)	Before commencement of Program activities	Program-specific Climate Adaptation Strategies submitted to and cleared by the Bank.	Captured under Training & Capacity Building
5	Gender Mainstreaming Amongst others there will be a women empowerment strategy for the reduction of gender gaps in results area, a target of parity (30%) in the training of new seed inspectors and young entrepreneurs, affirmative action for women cooperatives and gender diverse cooperatives and a gender responsive governance for the agri-food sector.	Develop a Program-specific Gender Action Plan to guide the work on women advancement and the reduction of gender gaps. The GAP should reflect local contexts of the various States where the Program is implemented.	FMAFS State Ministries of Agriculture and Rural Development NAGS -AP 2.0 Secretariat AfDB (validation and support, if necessary)	Before commencement of Program activities	Program-specific Gender Action Plan submitted to and cleared by the Bank.	(N) 30,000,000.00
6	Occupational Health and Safety • Agro-dealers did not enforce the use of personal protective equipment (PPEs) to minimize workers' exposure to hazardous materials and inhalation of organic dusts,	Incorporate Environment, Health and Safety (EHS) clauses in contractual documents for Agro-dealers.	FMAFS State Ministries of Agriculture and Rural Development	Before commencement of Program Activities	Evidence of Environment, Health and Safety (EHS) clauses in contractual documents for Agro-dealers.	60,000,000.00. Also, all agro-dealers/contractors shall provide the relevant PPEs to all their workforce

#	Issue	Recommended Action	Institutional Responsibility	Timeline	Deliverable	Estimated Budget
	<ul style="list-style-type: none"> • Improper storage facilities for fertilizers. Provision for wooden pallets was either non-existent or was limited, as fertilizer bags were seen stored on bare floors, • Improper arrangements for distribution of fertilizers at redemption centers which could potentially result in occupational health and safety hazards, • Although the NAGS-AP secretariat developed an Agricultural Input Distribution Catalogue which highlights measures for safe and environment-friendly operations, there was no evidence of proper implementation by Agro-dealers 	<p>Develop and implement a Hazardous Materials Management Plan to improve management practices of toxic chemicals and substances. The HMMP should cover the following aspects as a minimum:</p> <ul style="list-style-type: none"> • classification of chemicals and pesticides as hazardous substances; • banned and restricted chemicals and pesticides; • hazarding signs and labelling requirements; • handling and treatment of hazardous substances and their residues; • transportation clearance and requirements; • storage and safe use of hazardous substances; • chemical waste classification and labelling, and recycling of waste; • registration of chemicals and pesticides and issuance of clearance; • testing of pesticides; • drafting of an emergency preparedness and response plan; <p>Ensure that Extension Agents are trained in and use appropriate management procedures for the storage, handling, and application of all types of fertilizers, including organic wastes. The Agents should cascade the training to smallholder farmers in a culturally sensitive manner.</p> <p>Personal Protective Equipment (PPE) should be</p>	<p>NAGS -AP 2.0 Secretariat</p> <p>AfDB (validation and support, if necessary)</p>	<p>Before commencement of Program Activities</p> <p>Continuous throughout Program lifecycle</p> <p>Continuous throughout Program lifecycle</p>	<p>Hazardous Materials Management Plan submitted to and cleared by the Bank.</p> <p>Training Manual and Training Plan for Extension Agents covering EHS practices and requirements.</p> <p>EHS Inspection Checklist for Redemption Centres and Safety Data Sheets for agrochemical products.</p>	<p>(N) 15,000,000</p> <p>(N) 210,000,000.00</p> <p>To be provided by the NAGS-AP HQ (E&S Component)</p>

#	Issue	Recommended Action	Institutional Responsibility	Timeline	Deliverable	Estimated Budget
		used according to the Safety Data Sheets (SDS) of the product or according to a risk assessment of the fertilizer product. SDS should be available at across all State Redemption Centers.				
7	Stakeholder Engagement Inadequate stakeholder engagement and participation in program design and implementation. For example, NESREA and NAFDAC were not part of the key institutions engaged during the Phase 1 despite the scope of their respective mandates covering agrochemicals use, permit issuances and enforcement.	Develop and implement a robust Stakeholder Engagement Plan that maps all relevant key stakeholders covering government agencies and institutions, private sector organisations, civil society organisations (CSO), academia and research institute, industry associations, and international partners.	FMAFS State Ministries of Agriculture and Rural Development NAGS -AP 2.0 Secretariat AfDB (validation and support, if necessary)	Before commencement of Program Activities Continuous throughout Program lifecycle	Stakeholder Engagement Plan Records of Stakeholder Engagement Activities	(N) 90,000,000
8	Identified gaps in the country's Environmental and Social System particularly in the Agriculture Sector as detailed in Table 1 under Section 4, to mention a few: <ul style="list-style-type: none"> • lack of coverage of sexual exploitation, abuse and harassment (SEAH) and gender-based violence (GBV) risks, • Social risks arising from climate vulnerability and climate-induced hazards • lack of detailed guidance on estimation of compensation at full replacement cost for affected assets and institutional coordination for determining adequate compensation regime for Project Affected People, • lack of explicit guidelines on the reporting structures for a Resettlement Action Plan (RAP), Livelihood Restoration Plan (LRP), and Stakeholder Engagement Plan (SEP), and Community Development Plan (CDP) • Timeline threshold for response to grievance submitted (60 days) is somewhat long and could be 	Given the range of gaps identified in Table 1 under Section 4, the Borrower should work with the Bank to strengthen country's environmental and social system by facilitating capacity building sessions on Environment, Climate and Gender Safeguards to PIU (made up of only government staff) at the Federal	FMAFS State Ministries of Agriculture and Rural Development NAGS -AP 2.0 Secretariat AfDB	During program implementation	E&S System Strengthening Capacity Building Sessions for PIU, with participation at the Federal and State levels.	TBD

#	Issue	Recommended Action	Institutional Responsibility	Timeline	Deliverable	Estimated Budget
	reduced to 30 days to ensure timeliness of grievance resolution.					

7. ASSESSMENT OF THE REPUTATIONAL RISK TO THE BANK

This Chapter presents a high-level analysis of the overall E&S risk to which the borrower and the Bank are exposed if the Program was not performing satisfactorily. Reputational risk to the Bank can stem from various sources, including operational shortcomings, questionable judgments, external attacks, inadequate AfDB post-approval E&S support to borrowers, projects that have negative environmental impacts can damage and those that are perceived as having negative social impacts, such as displacement of communities or violation of human rights and even financial losses.

The overall Program risk assessment and mitigation measures are presented in Table 3 below:

Table 3: Overall Program Risk and Mitigation Measures

Risk Category	Risk Description	Rating	Mitigation measures	Risk Owner
Political and Governance	This encompasses the assessment to the project development objective stemming from the country's political situation and governance context	Low	Establish clear roles and responsibilities for different stakeholders, to avoid confusion and overlapping decision making. Establish transparent decision-making process and regular communications channels to keep all parties informed about project progress and challenges. Create contingency plans for potential political or regulatory changes that could impact the project timeline or funding.	FGN
Macroeconomic	The country's economy is exposed to fluctuations in the international market prices (particularly fuel, food, and other commodities). Also, domestic sources of macroeconomic risks such as inflation rate can consequently slow down economic growth	Medium	The Bank will continue to work in close coordination with other partners to enhance macro-fiscal dialogue with Fed. Govt, and to share information necessary for quick and effective response to economic shocks.	FGN
Fiduciary risk	Lack of transparency, fairness and accountability in implementation of Program activity	Medium	An Independent Verification Agency (IVA) will be selected to verify the attainment of DLIs before the release of funds, in accordance with the agreed schedule. A procurement audit shall be performed by the Bureau of Public Procurement (BPP) or by an Independent Consultant if BPP is not able to do so on funded by the program, in line with the national procurement laws and regulations	FGN

Risk Category	Risk Description	Rating	Mitigation measures	Risk Owner
Capacity of Implementing Entity/Agency	Implementation delay: Project completion delays and failure to meet performance requirements	Low	Implementation capacity of the Executing Agencies will continue to be enhanced, and internal systems improved through capacity building to mitigate delays in project delivery. Invest in technology solutions that can enhance efficiency and productivity during implementation,	FGN
	Poor coordination between various government agencies involved in implementing NATIP and institutional sustainability		NAGS will be strengthened to co-ordinate some of the schemes aligned with NATIP including the Agro-Pocket. The Committees at the various levels will support coordination as well. The institutional arrangement will augment existing institutions and expertise to enable continuity of Program activities after the funding period.	
Insecurity	Pockets of banditry, insurgency and other conflict affect supply of inputs and farming activities	low	The Program will rely on security advise and temporarily exclude insecure areas where farming activities cannot be undertaken	FGN

The E&S reputational risk assessment builds on the overall risk evaluation of the Program to determine the likelihood and magnitude of key risk factors. The critical reputational risk indicators are assessed as below in Table 4.

Table 4: E&S-related Reputational Risk Assessment for the Bank

#	Reputational Risk Indicator	Program Assessment	Risk Rating
1	Borrower's failure to comply with the E&S provisions reflected in the Financing/Legal Agreement.	The Borrower, the Executing Agency and Program Implementing Entity are well acquainted with the Bank's E&S requirements and will utilise lessons learned from previous and ongoing programs to improve E&S performance at the institutional and project-program levels. The NAGS-AP project did not submit Annual Environmental and Social Audit Report and delayed the preparation of the Integrated Pest Management Plan due to weak coordination and insufficient budgetary allocation for E&S workstreams. The Bank will support the Borrower to implement the Program using the country's systems with a view to addressing gaps identified by the ESSA.	Medium
2	Non-compliance with procedures or failure to resettle Project Affected People (PAP) due to unavailability of resources (land and finance) or use of forced eviction, while related activities are being implemented.	Program activities do not require any land acquisition; therefore, risks associated with resettlement is not applicable.	Low
3	Critical/acute pollution and/or nuisance events that entail medium to long term	The Program activities include provision of capacity building on Sustainable, Climate-Smart Agricultural Practices which will raise	Low

#	Reputational Risk Indicator	Program Assessment	Risk Rating
	threats to communities' health and natural resources that sustain livelihoods or economic activities.	awareness on measures to avoid pollution of the environment. Most of the Program activities are unlikely to result in or contribute to pollution of natural environment.	
4	Persistent records of non-compliance to national labour laws (abuse of workers' rights) and recurrent accidents and fatalities	The review of historical reports based on project implementation under the NAGS-AP Phase 1 did not reveal any occurrence of serious accidents and fatalities. Given the nature of program activities, the likelihood of recurrent and fatalities is considered low. Furthermore, there have been no report to the Bank of persistent abuse of workers on previous and ongoing projects supported by the AfDB.	Low
5	Ongoing and recurrent complaints and grievance redress processes from project affected persons and other institutional stakeholders	Although no documentation on Grievance Mechanism for NAGS-AP Phase 1 was available for review, the likelihood of ongoing and recurrent complaints is considered low. The NAGS 2.0 will be build on the performance of the Phase 1 project activities to enhance stakeholder management. The use of digital voucher system and other technological tools will enhance transparency and improve accountability systems.	Low
6	Persistent weaknesses in Borrower's E&S risk management capacity.	A review of Borrower's E&S Capacity under NAGS-AP, indicated that there are technical, financial and institutional gaps that need to be addressed.	Medium
7	Weaknesses in project preparation due diligence.	The Bank has a dedicated Project Team with multidisciplinary expertise that will conduct due diligence on the Program. The Bank's mechanism for ensuring Quality at Entry will address any potential weakness in project preparation due diligence.	Low
8	Legacy issues in inadequate land compensation.	The Program activities do not involve any land acquisition, so legacy issues do not apply.	Low

8. PROGRAM MONITORING AND IMPLEMENTATION SUPPORT

The monitoring and evaluation of the progress towards targets for the proposed RBF will be carried out by NAGS secretariat alongside the reporting on the implementation of the NAGS. NAGS secretariat has demonstrated capacity and skills to undertake the monitoring and evaluation activity of the RBF program through results-based management frameworks. The National Steering Committee will provide high level oversight to ensure efficient use of the allocated funds. An Independent Verification Agency (IVA) will be selected to verify the attainment of DLIs before the release of fund, in accordance with the agreed schedule. The skills for undertaking Monitoring and Evaluation activities will be enhanced through capacity building of staff from the Federal Ministry of Finance, Federal Ministries of Agriculture and Food Security and the Executing Agencies under Results Area 5.

The Bank in its supervision of the NAGS operation has used independent institutions to verify the information on farmers that have been supported and area cultivated as follows: NAERLS has undertaken telephone survey of a representative sample of farmers that have received inputs to ascertain that they are genuine farmers and did receive the inputs. This was to appreciate the propensity for roundtripping and ensure success of the intervention. In addition, the Bank undertook a satellite mapping and remote sensing work to estimate the actual hectareage of wheat that was cultivated in the season. Such independent verifications will be used in the Bank's supervision of the RBF.

Table 5: Program E&S Monitoring Plan

Monitoring Parameter	Indicators	Monitoring Frequency	Means of Verification	Responsibility
Climate and Environment	Number of specific actions completed based on the Climate Adaptation Strategies	Quarterly/Annually	Cleared Quarterly E&S Implementation Report	FMAFS/ NAGS Secretariat AfDB
	Implementation of Applicable E&S instruments such as Integrated Pest Management Plan (IPMP), Hazardous Materials Management Plan (HMMP), Stakeholder Engagement Plan (SEP) and Grievance Redress Mechanism (GRM).	Quarterly/Annually	Cleared Quarterly E&S Implementation Report	FMAFS/ NAGS Secretariat AfDB

Monitoring Parameter	Indicators	Monitoring Frequency	Means of Verification	Responsibility
Gender Action Plan	Number of actions completed based on the Gender Action Plan	Quarterly/Annually	Cleared Quarterly E&S Implementation Report	FMAFS/ NAGS Secretariat AfDB
Periodic E&S Reporting	Number of E&S reports submitted to the Bank	Quarterly	Cleared Quarterly E&S Implementation Report	FMAFS/ NAGS Secretariat AfDB
	Number of E&S Reports cleared by the Bank			AfDB
	Submission of Annual Environmental and Social Audit Report	Annually	Cleared Annual Environmental and Social Audit Report	FMAFS/ NAGS Secretariat AfDB
E&S Budget	Total amount (in naira or USD) allocated to E&S workstreams	Annually	E&S Budget Extract from Annual Work Plan	FMAFS/ NAGS Secretariat AfDB
E&S Capacity and Competency	Number of E&S Staff at the National PIU	Once/Annually	Cleared CVs of E&S Safeguards Staff at the National PIU	FMAFS/ NAGS Secretariat
	Number of States with designated E&S Safeguards Officers		List of State-level E&S Safeguards Officer in E&S Implementation Report	AfDB
	Number of E&S-related and other capacity building attended by E&S Safeguards Staff	Quarterly/Annually	Cleared Annual Training Plan, Training Budget, Training attendance records, Training Materials, Training Certificates, and Training Photo Session	FMAFS/ NAGS Secretariat AfDB
	Number of E&S-related capacity building facilitated by NPIU to different categories of Program Beneficiaries (disaggregated by type and size)	Quarterly/Annually	Annual Training Plan, Training Budget, Training attendance records, Training Materials, Training Certificates, and Training Photo Session	FMAFS/ NAGS Secretariat AfDB

Monitoring Parameter	Indicators	Monitoring Frequency	Means of Verification	Responsibility
	Number of Agro-dealers and Smallholder farmers trained on the IPMP.			
	Number of E&S Supervision Mission undertake by NPIU Staff to Beneficiary States	Bi-Annually/ Annually	E&S Supervision Budget E&S Supervision Report	FMAFS/ NAGS Secretariat AfDB
Country Environmental and Social System Strengthening	Number of capacity building sessions facilitated providing institutional support for the PIU (made up of only government staff) at Federal and State levels. Number of participants in the capacity building sessions at the Federal and State levels.	Annually/ At least once during the project implementation phase	Budget for PIU E&S Capacity Strengthening (not less than 200,000UA) E&S Capacity Building Report for PIU (including photos, attendance records, official communication records, etc.)	FMAFS/ NAGS Secretariat AfDB

9. CONCLUSION

In line with the AfDB's RBF Policy, the country's environmental and social systems are adopted for mainstreaming of safeguards requirements in programme implementation. Accordingly, it was imperative that the national environmental and social system is assessed against the Bank's ISS requirements, which often has more stringent provisions for ensuring adherence to international best practices in programme implementation. The scope of activities undertaken during the Environmental and Social System Assessment exercise consists of (i) identification of the Program's environmental, health, safety, and social risks; (ii) assessment of the legal and policy framework for environmental and social management, including a review of relevant legislation, rules, procedures, and institutional responsibilities that are to be adopted by the Program; (iii) assessment of the implementing institutional capacity and performance to manage potential adverse environmental and social issues; and (iv) proffering recommendation of specific actions to address gaps in the Program's environmental and social management system, and in the policy and legal framework and implementation capacity.

The ESSA has established guidelines on actions to drive sound environmental and social management practices within the Program at the national and subnational levels. It provides a useful framework to inform decision-making by the relevant authorities in the Borrower's country and supports the Bank's internal review and decision process associated with the Program. Given that the core objective of the ESSA is the strengthening of national environmental and social system, institutional capacity building with a budget of not less than 200,000UA has been incorporated into the Program E&S Action Plan. By developing capacity of institutions at the national and subnational level, the implementation of Program activities across the 36 States and the FCT will comply with not only national legislation and guidelines but also the Bank's ISS requirements.

The Bank worked closely with the Borrower in preparing the ESSA; however, the findings, conclusions, and opinions expressed in the documents are those of the AfDB. The recommended actions derived from this assessment have been extensively discussed and agreed upon with the Borrower and will be incorporated into the Financing Agreement Environmental and Social Management Plan (FA ESMP).

The African Development Bank will work closely with the Borrower during project implementation to ensure that the Program Action Plan are duly executed in a manner that does not occasion any reputational risks and that further strengthens the country's national environmental and social system. Adhering to international best practices not only supports the country's aspirations to achieve food security but also protects its human and social capital which are critical levers for sustained economic productivity and socio-ecological resilience.

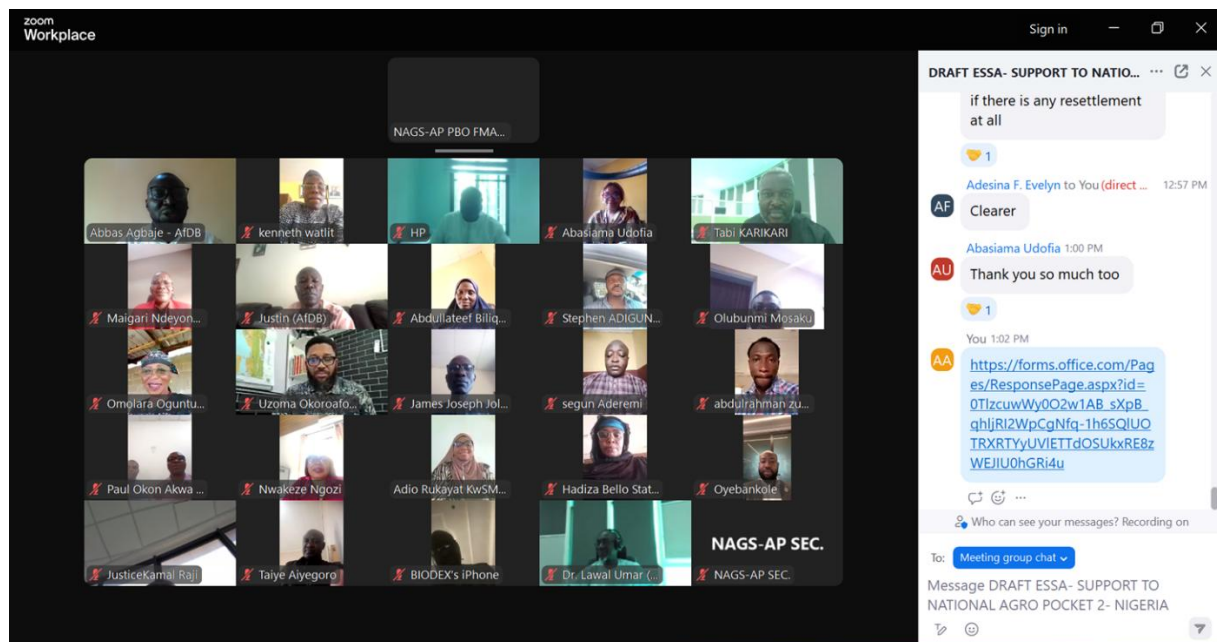
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ANNEXES

Annex 1: Evidence of Public consultation with Stakeholders



zoom Workplace

Sign in Recording... View

Abbas Agbaje - AFDB is talking...

NAGS-AP PBO FMA... abama samuel (NA...

Taiye Aiyegoro Dr. Lawal Umar (Olubunmi Mosaku ALABELEWE SA MR NED

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Hadiza Bello St... Stephen ADIGU... Musa Salah Adesina F. Evelyn Absalom Akwaras

Hadiza Bello Stat... Stephen ADIGU... Musa Salah Adesina F. Evelyn Absalom Akwaras

Chirwe Monica ... Philip Cobbina SULAIMAN MU... Vivian Obenney... Ibrahim Moham...

Ndifreke Akpan Isa Isyaku Hotoro Khadija ishaku... Nasir Mohamm... Sani Bako fago

Ndifreke Akpan Isa Isyaku Hotoro Khadija ishaku... Nasir Mohammed Sani Bako fago

Audio Video Participants Chat React Share Host tools More Leave

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Clearer

Abasiama Udofia 1:00 PM

Thank you so much too

You 1:02 PM

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Who can see your messages? Recording on

To: Meeting group chat

Message DRAFT ESSA- SUPPORT TO NATIONAL AGRO POCKET 2- NIGERIA

ID	Start time	Completion time	Email	Name	Last modified	Name2	Institution	Role
1	5/27/25 12:40:59	5/27/25 12:41:41	T.KARIKAPI@AFDB	TABI KARIKAPI		Tabi KARIKAPI	African Development	Chief Agro-Industry Officer / Task Manager
2	5/27/25 12:41:50	5/27/25 12:42:14	O.AGBELLUSI@afdb	OYEBANKOLE OYEDAPO AGBELLUSI		Oyebankole Agbelusi	AFDB	SNSC
3	5/27/25 12:42:45	5/27/25 12:43:06	anonymous			Kamaldeen Raji	AFEX	Managing Director
4	5/27/25 12:42:52	5/27/25 12:43:36	anonymous			Sani Bako Fago	FMAFS	State Coordinator FMAFS KATSINA STATE FIELD OFFICE
5	5/27/25 12:42:57	5/27/25 12:43:47	anonymous			Abama samuel	NAGS-AP	Monitoring and Evaluation officers
6	5/27/25 12:43:05	5/27/25 12:43:51	anonymous			Dr. Lawal Umar	AFDB	Consultant
7	5/27/25 12:43:03	5/27/25 12:43:56	anonymous			Stephen Adigun	Seed Entrepreneurs	Ag. Executive Secretary
8	5/27/25 12:42:55	5/27/25 12:44:07	anonymous			Baba Ibrahim Muhar	CropIT Nigeria Limit	Field Operation Manager
9	5/27/25 12:43:03	5/27/25 12:44:14	anonymous			Abdulrahman Zubair	kebbi state ministry	Ag. HOD laboratories, department of environmental assessment and industrial compliance
10	5/27/25 12:43:08	5/27/25 12:44:20	anonymous			Ilies Abdulghaniyy	C Kwara State Ministry	Ag. Director in charge of Climate Change and Environmental Assessment
11	5/27/25 12:43:04	5/27/25 12:44:20	anonymous			Hadiza Bello Abdul	Federal Ministry of A State	Coordinator
12	5/27/25 12:43:11	5/27/25 12:44:21	anonymous			ISHAKU APDO BUB	NAGS-AP	NPC
13	5/27/25 12:42:51	5/27/25 12:44:33	anonymous			Adio Rukayat	Kwara State Min. Of	Assistant Chief Scientific Officer/Head EIA UNIT.
14	5/27/25 12:43:02	5/27/25 12:44:53	anonymous			Vivian Collins-Oberu	FMAFS, Rivers state	State Coordinator, Rivers State.
15	5/27/25 12:42:59	5/27/25 12:44:54	anonymous			Adesina Fumilayo I	Oyo State Ministry of Director	Pollution Monitoring and Quality Control
16	5/27/25 12:44:29	5/27/25 12:45:20	anonymous			ADESOLA TOYINNE	NAGS-AP	HEAD, AGRICULTURAL SERVICES
17	5/27/25 12:45:11	5/27/25 12:45:51	anonymous			Kenneth Walit Naan	FMA&FS	State coordinator
18	5/27/25 12:45:03	5/27/25 12:46:34	anonymous			Isa Isyaku Hotoro	Federal Ministry of A	Kano State coordinator
19	5/27/25 12:45:54	5/27/25 12:46:45	anonymous			Mohammed Hamadi	African Development	E&S Safeguards Compliance Consultant
20	5/27/25 12:44:17	5/27/25 12:46:50	anonymous			Nasir Mohammed	Verdant Agri -Tech	National Lead of Verdant for the NAGS-AP project
21	5/27/25 12:45:45	5/27/25 12:46:54	anonymous			Nwkeze Ngozi	FMAFS	State Coordinator Enugu State
22	5/27/25 12:45:14	5/27/25 12:46:56	anonymous			James J. Jolly	FMAFS, Nasarawa	State Coordinator
23	5/27/25 12:45:34	5/27/25 12:47:02	anonymous			Olubunmi Paul	CropIT Nigeria Limit	Deputy Managing Director
24	5/27/25 12:46:29	5/27/25 12:47:17	anonymous			Abdulleef Biligis F	FMAFS	Oyo State
25	5/27/25 12:45:08	5/27/25 12:47:46	anonymous			Azeez Opeoluwa Mo	Ministry of Environr	Scientific Officer
26	5/27/25 12:47:39	5/27/25 12:49:30	anonymous			Adefesobi Oluwaloyi	FMAFS	State Coordinator, Oyo State
27	5/27/25 12:43:17	5/27/25 12:49:57	anonymous			Abasiama Udofia	Ministry of Environr	Pollution Control and Environmental Health (Reviewer)
28	5/27/25 12:51:21	5/27/25 12:53:00	anonymous			Sulaiman Musa	FMAFS /OBE STA	State Coordinator
29	5/27/25 12:55:15	5/27/25 12:56:05	anonymous			Tabi KARIKAPI	African Development	Chief Agro-Industrial Officer, AHAI 3 Task Manager
30	5/27/25 12:58:25	5/27/25 12:59:23	anonymous			Absalom Akwaras L	Federal ministry of A	State coordinator FMAFS, Gombe state
31	5/27/25 13:00:06	5/27/25 13:00:46	anonymous			Adereimi Olusegun	Federal ministry of A	State Coordinator
32	5/27/25 12:55:57	5/27/25 13:00:53	anonymous			CHIDMA FRANCES	NAGS-AP	HEAD, ICT
33	5/27/25 13:00:20	5/27/25 13:02:02	anonymous			MICHAEL KINGSLE	NAGS-AP	E & S COMPLIANCE OFFICER
34	5/27/25 13:02:10	5/27/25 13:03:21	anonymous			ISHAKU HAGGAI	NAGS-AP	AGRICULTURAL OFFICER
35	5/27/25 13:03:18	5/27/25 13:04:19	anonymous			Alibelewe Sal	Kwara State Ministry	AGS/Head of Climate Change Unit
36	5/27/25 13:03:51	5/27/25 13:07:55	anonymous			Uzoma OKOROAFD	The African Develop	Environmental & Social Safeguards and Compliance Officer
37	5/27/25 13:09:23	5/27/25 13:10:58	anonymous			Kenneth Naankang	FMA&FS	State coordinator

Annex 2 Evidence of Disclosures in-Country and Bank's website

Disclosure link to be inserted.