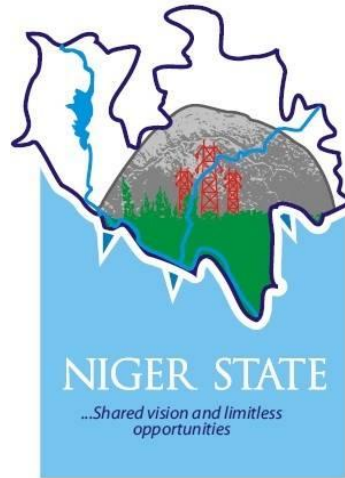




Environmental and Social Management Toolkit for FRILIA- Niger State, Nigeria



Environmental and Social Risk Management Toolkit

Prepared for Niger State Government

Issued according to Executive Order No. 5 of 2023 titled: Establishment, Adoption, and Implementation of Framework for Responsible and Inclusive Land Intensive Agricultural Investment (FRILIA) Order issued on 20th December, 2023

Prepared by:  **Greenswitch**

2ND DECEMBER, 2024



1 INTRODUCTION

1.1 *Introduction to the Environmental and Social Risk Management Toolkit*

The Environmental and Social Risk Management (ESRM) toolkit provides templates for environmental and social (E&S) standards pertaining to the operationalisation of the Framework for Responsible and Inclusive Land-Intensive Agricultural Investments (FRILIA) in Niger State. These E&S standards are typically regulated by the Niger State Ministry of Environment. Also, certain environmental and social components may be managed by the Niger State Environmental Protection Agency, Niger State Ministry of Agriculture Niger State Waste Management Agency depending on the scope of the FRILIA project. Therefore, the ESRM toolkit provides these related Ministries, Departments, and Agencies (MDAs) with the framework to guide the investor on implementing the various safeguards for E&S sustainability as it relates to their project value chain and life cycle.

1.2 *Scope of the Environmental and Social Risk Management Toolkit*

This toolkit provides an ESRM Framework for potential investment activities via FRILIA, from the planning to the operation stage of such investments. The ESRM toolkit covers the following:

- Examining the project's E&S viability through screening and due diligence procedures.
 - Collecting baseline E&S information to interpret potential impacts.
 - Managing potential impacts, both positive and negative (including climate change adaptation, resilience, and mitigation), in accordance with best practice guidelines.
 - Creating management plans to reduce negative impacts and/or improve positive impacts, as well as monitoring and evaluating their effectiveness.
- This toolkit is underpinned by the following FRILIA principles:
- Overarching principle: OV5. Responsible investment should protect against environmental damage.

1.3 *Outgrower Schemes*

Outgrower schemes are broadly defined as contractual agreements between small scale farmers and buyers of farm products, in terms of which:



- Farmers agree to supply an offtaker with agricultural produce to stated requirements of Quantity, Quality, Timing and Price; the offtaker agrees to buy the produce, often at a prior agreed price. Usually, the offtaker also provides some incentives such as pre-finance; seeds and fertilisers and other inputs; creditworthy contracts with the farmers; and knowledge of modern business farming.
- Outgrowing enables investors to obtain more produce without the need for acquiring more land, and without using additional capital.
- Outgrowing ensures the involvement of local farmers, introduces modern farming techniques, and contributes significantly to the economic upliftment and social harmony of the surrounding communities.
- Outgrowing keeps land and other natural resources in the hands of the community.

The Outgrower toolkit will enable such investors to follow an agreed pathway to identify, contract and work with smallholder farmers as Outgrowers and suppliers of essential feedstock.

It is worth noting that without outgrowers, Agri-investors would be forced to demand more land, and with that bring about all the problems that the FRILIA is trying to resolve. Outgrowers are therefore a key strategy for the success and sustainability of Agri-investment in Niger State.

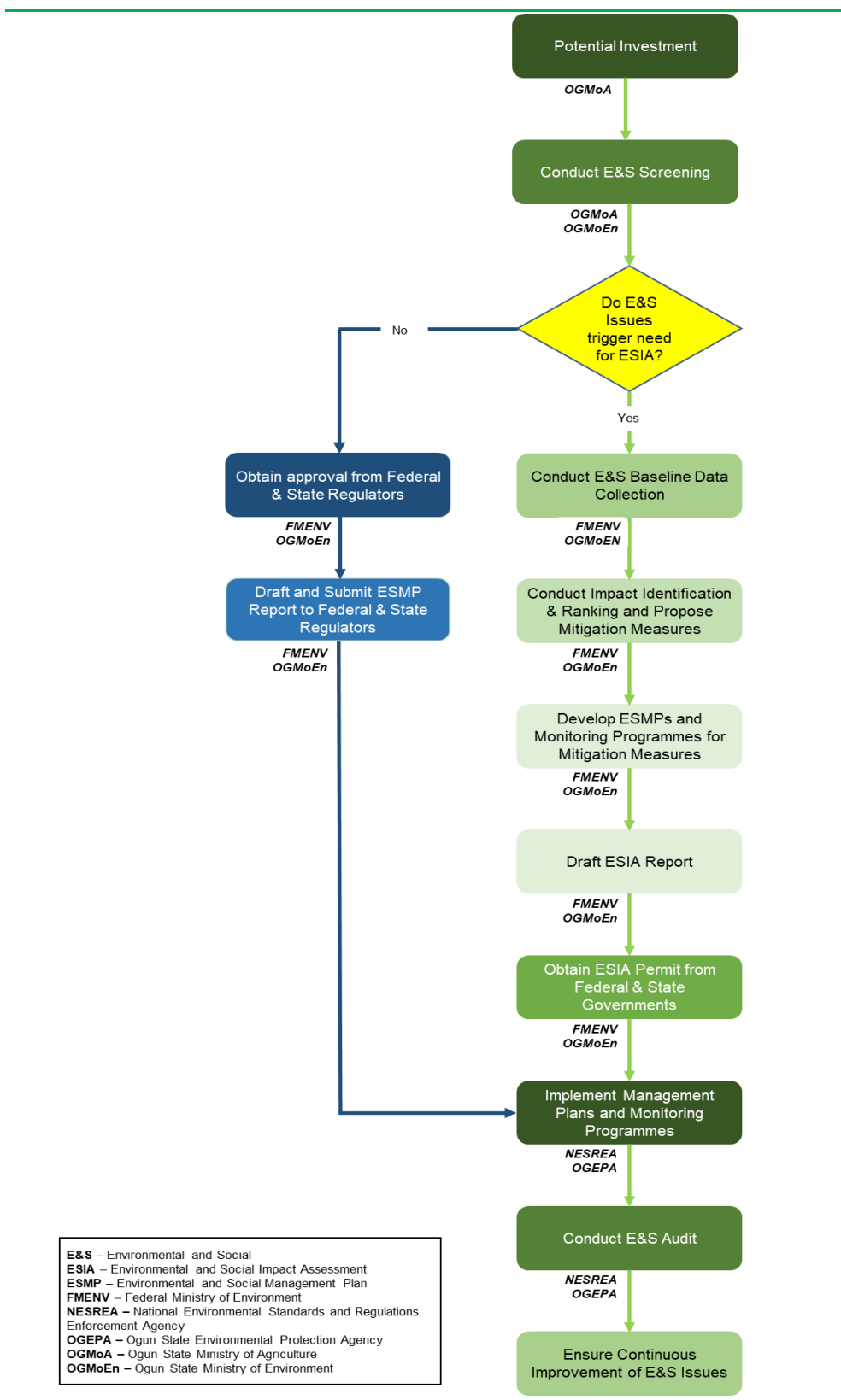


2 ENVIRONMENTAL AND SOCIAL RISK MANAGEMENT TOOLKIT PROCESS MAP

The ESRM toolkit process map (Figure 2.1) provides the journey for investors to manage and mitigate E&S risks and opportunities from the project inception stage to the monitoring and evaluation of the Environmental and Social Management Plans (ESMP). The process is also essential for regulators, communities, out-growers, and all other stakeholders to engage the investors across every phase of the project lifecycle regarding E&S risks, impacts and opportunities.



Figure 2.1 Typical ESRM Process Map for Projects under FRILIA



E&S – Environmental and Social
ESIA – Environmental and Social Impact Assessment
ESMP – Environmental and Social Management Plan
FMENV – Federal Ministry of Environment
NESREA – National Environmental Standards and Regulations Enforcement Agency
OGEPA – Ogun State Environmental Protection Agency
OGMoA – Ogun State Ministry of Agriculture
OGMoEn – Ogun State Ministry of Environment



2.1.1 *Stage 1 - Conduct E&S Screening*

Once a potential investment is identified by an investor and documented with the Niger State Ministry of Agriculture the investor and Niger State Ministry of Agriculture conduct an E&S Screening. This involves an initial assessment of the investment to understand the potential E&S impact. Investments can be categorized as High (Category I), Medium (Category II), or Low Risk (Category III). The E&S Screening Categorization Template (Template 1) provides the projects under each risk category.

If the screening reveals that the project is medium and high risk, then Stage 2 (Conduct E&S Baseline Data Collection) is triggered. If the project is low risk, then the investor and Niger State Ministry of Agriculture trigger Stage 11.

2.1.2 *Stage 2 - Conduct E&S Baseline Data Collection*

Medium and high risk projects will trigger the regulatory environmental and social impact assessment (ESIA) process. The Federal Ministry of Environment (FMENV), the regulatory body in charge of ESIA in Nigeria, has a step-by-step project on the ESIA. The FMENV implements these steps with the support of the Niger State Ministry of Environment. A summary of activities within each step and the roles and responsibilities of the investor, Niger State Ministry of Environment and FMENV are outlined in the Regulatory ESIA Process Template (Template 2).

Furthermore, medium and high-risk projects are likely to trigger all other toolkits. These include the Stakeholder Engagement (SE) toolkit, Outgrower and Food Security (OFS) toolkit, Involuntary Resettlement, Valuation and Compensation (IRVC) toolkit, Grievance Redress Mechanism (GRM) toolkit, Global Memorandum of Understanding (GMoU) toolkit, and Community Needs Assessment and Development Plan (CNDP) toolkit.

As part of the ESIA, data and information for the description of the existing environmental conditions of the project area shall be collected using appropriate methodologies for each parameter. Environmental aspects relevant to FRILIA projects include climate, geology and hydrogeology, air quality and noise, surface and groundwater quality, aquatic biodiversity (hydrobiology), soil, land use, terrestrial biodiversity (flora and fauna), and ecosystem services. The qualitative and quantitative parameters for each environmental aspect are shown in Template 3, the ESIA Baseline Data Collection Protocol for Environmental Parameters.

Similar to environmental data, information for the description of the existing socio-economic characteristics of the project area shall be collected using appropriate

methodologies. Social aspects relevant to FRILIA investments include demography, ethnicity, language, religion, vulnerable groups, administrative and socio-cultural institutions, migration trends and patterns, land acquisition, economics, livelihoods, community grievances and expectations, education, employment, health status and access to health services, security infrastructure and services, culture, settlement pattern, other infrastructure and stakeholder engagement. The qualitative and quantitative parameters for each social aspect are shown in Template 4, the ESIA Baseline Data Collection Protocol for Social Parameters. However, this is only primary information as the GMoU, GRM, CNDP, SE, and IRVC toolkits contain more specific details on data collection in relation to their respective social aspects.

2.1.3 Stage 3 - Conduct Impact Identification, Ranking, and Propose Mitigation Measures

Stage 3 involves impact identification, ranking, and development of mitigation measures as part of the ESIA process. The potential for an E&S impact exists where an environmental or social aspect has been identified (i.e., where a project activity has been determined to have the potential to interact with the biophysical and socio-cultural environment). This can be done using an interaction matrix of project activities versus receptors as shown in Tables 2.1 and 2.2 below.

Table 2.1 Sample of Project Activities vs Environmental Receptors for FRILIA Projects

Project Activities at Various Phases	Air Quality	Noise & Vibration	Soil	Groundwater & Aquifers	Surface water	Hydrological system	Landscape/ Topography	Terrestrial Flora & Fauna	Aquatic Flora & Fauna
Land Preparation									
Mobilization of Personnel, materials, and equipment to site	X	X	X		X				
Site clearing and preparation	X	X	X	X	X	X	X	X	X
Planting/Aquaculture/Livestock Rearing									
Civil work activities including construction of site access road, excavation, trenching,	X	X	X	X	X	X	X	X	X

construction of farm buildings									
Planting activities for crops, horticulture, and fibre; Aquaculture activities; Livestock rearing	X	X	X	X	X			X	
Waste generation and disposal			X	X	X			X	X
Farming Activities/Operations									
Farm management activities e.g., thinning, fertilizer application, watering, aquaculture and livestock feeding, harvesting, storage, etc.	X	X	X	X	X				
Equipment management and maintenance	X	X	X						
Waste generation and disposal	X		X	X	X			X	X

“X” is used to establish an interaction between a particular environmental or social receptor and the project activity

Table 2.2 Sample Project Activities vs Social Receptors for FRILIA Projects

Project Activities at Various Phases	Archaeology & cultural property	Land use	Population	Utilities & Infrastructure	Employment/ Income	Socio-cultural structure	Visual prominence	Occupational health and safety	Food safety & security
Land Preparation									
Site/Land Take	X	X							
Mobilization of Personnel, materials, and equipment to site		X	X	X	X	X		X	

Site clearing and preparation		X			X		X	X	
Planting/Aquaculture/Livestock Rearing									
Civil work activities including construction of site access road, excavation, trenching, construction of farm buildings		X	X	X	X	X	X	X	
Planting activities for crops, horticulture, and fibre; Aquaculture activities; Livestock rearing		X	X	X	X	X		X	X
Waste generation and disposal				X				X	X
Farming Activities/Operations									
Farm management activities e.g., thinning, fertilizer application, watering, etc.			X		X	X		X	X
Equipment management and maintenance								X	
Waste generation and disposal				X				X	X

The significance of each impact is then determined as a product of the impact magnitude (ranked as positive, negligible, low, medium, or high) and receptor sensitivity (ranked as low, medium, or high). The next paragraphs define impact magnitude and receptor sensitivity with samples of how they relate to typical FRILIA projects.

Impact Magnitude is in practice a continuum, and evaluation along the spectrum requires the exercise of professional judgement and experience. Each impact is evaluated on a case-by-case basis, and the rationale for each determination is noted. The magnitude designations employed for potential negative impacts are: Negligible, Low, Medium and High. Tables 2.3 and 2.4 below show samples of how impact magnitudes can be defined for environmental and social impacts regarding potential FRILIA projects in Niger State.

Table 2.3 Sample of Impact Magnitude Criteria for Environmental Impacts

Category	Ranking	Definition
High	4	Regional to national scale impact resulting in: Medium term change and/or damage to the natural environment and its ecological processes.

Category	Ranking	Definition
		<p>Reduction in regional habitat and species diversity.</p> <p>Direct loss of habitat for endemic, rare and endangered species of fauna and/or flora and for species' continued persistence and viability nationally and regionally (for species unable to disperse).</p> <p>Natural habitat restoration time 5-10 years and requiring substantial intervention.</p> <p>Breach of environmental regulations and company policy.</p> <p>Sustained adverse national media attention.</p> <p>Significant medium-term financial loss.</p> <p>Examples of potential Niger State FRILIA projects include large scale forestry (for fibre), large scale crop plantations, and medium-large scale livestock farming (especially ranching activities).</p>
Medium	3	<p>Local to regional scale impact resulting in:</p> <p>Short term change and/or damage to the natural environment and its ecological processes.</p> <p>Direct loss of habitat crucial for species' (including listed species) continued persistence and viability in the project area (for species unable to disperse).</p> <p>Introduction of exotic species of fauna in invasive floral species replacing resident 'natural communities' within the project area.</p> <p>Environmental stress lowering reproductive rates of species within the project area.</p> <p>Natural restoration time 2-5 years and requiring intervention.</p> <p>Potential breach of environmental regulations and company policy.</p> <p>Complaints from the public, authorities and possible local media attention.</p> <p>Medium-term financial loss.</p> <p>Examples of potential Niger State FRILIA projects include medium scale forestry (for fibre), medium scale crop plantations, medium scale livestock farming (especially ranching activities), large scale horticulture that can lead to introduction of exotic species, and medium-large scale aquaculture (especially on natural water bodies).</p>
Low	2	<p>Local scale impact resulting in:</p> <p>Short term change and/or damage to the local natural environment and its ecological processes.</p> <p>Short-term decrease in species diversity in selected biotopes/areas within the project area.</p> <p>Increased mortality of fauna species due to direct impact from project activities.</p> <p>Natural restoration within 2 years requiring minimal or no intervention.</p> <p>Public perception/concern.</p> <p>Short-term financial loss.</p>
Negligible	1	<p>Impact largely not discernible on a local scale being absorbed by the natural environment; areas adjacent to disturbed areas absorb exodus of species able to disperse.</p> <p>Restoration within 6 months without intervention.</p> <p>Public perception/concern.</p> <p>Minimal financial loss.</p>

Category	Ranking	Definition
		It may be rare for Niger State FRILIA projects to have low environmental impact magnitude.
Positive	+	<p>Activity has net positive and beneficial effect resulting in environmental improvement for example:</p> <p>Ecosystem health.</p> <p>Increase in magnitude or quality of habitat for rare and endangered species of fauna and flora as well as for those species known to naturally occur in the area.</p> <p>Growth of 'naturally occurring' populations of flora and fauna.</p> <p>Positive feedback from stakeholders.</p> <p>Potential financial gains.</p> <p>Examples of potential Niger State FRILIA projects include large scale forestry (for land restoration, carbon sinks, or reforestation purposes).</p>

Table 2.4 Impact Magnitude Criteria for Social Impacts

Category	Ranking	Definition
High	4	<p>Major impacts on human health (e.g. serious injury).</p> <p>Significant impact on the livelihoods of individuals (i.e. access to income source restricted over lengthy periods of time).</p> <p>Serious impact on access to community facilities and utilities (e.g. resettlement of large numbers (10s – 100s) of households).</p> <p>Notable consequence on the economy, at a local, regional and/or national level (e.g. virtually no local sourcing of supplies or personnel).</p> <p>Breach of economy, social policy and/or regulation.</p> <p>Examples of potential Niger State FRILIA projects include any forestry (for fibre) projects, any crop plantations, medium-large scale livestock farming (especially ranching activities), and aquaculture. Typically, most Niger State FRILIA projects will have medium to high social impact magnitude.</p>
Medium	3	<p>Modest impact on human health and well-being (e.g. noise, light, odor, dust, injuries to individuals).</p> <p>Moderate impact on individual livelihoods (e.g. restricted access to income source).</p> <p>Medium impact on access to community facilities and utilities (e.g. access to utilities restricted for long periods (weeks) of time).</p> <p>Moderate impact on the wider economy, at a local, regional and/or national scale (e.g. only moderate levels of employment and supplies sources within Nigeria).</p> <p>Potential breach of company social policy and/or legislation.</p> <p>Typically, most Niger State FRILIA projects will have medium to high social impact magnitude.</p>
Low	2	<p>Limited impact on human health and well-being (e.g. occasional dust, odors, traffic noise).</p> <p>Some impact on the livelihoods of individuals (e.g. isolated incidents related to ethnic tensions and some restrictions on access to income</p>

Category	Ranking	Definition
		<p>source). Natural restoration within 2 years requiring minimal or no intervention.</p> <p>Some impact on access to community facilities and utilities (e.g. access to cultural centers restricted to a limited extent, i.e. (days).</p> <p>Sparse impact on the wider economy, at a local, regional and national level (e.g. limited procurement).</p>
Negligible	1	<p>Possible nuisance to human health and well-being (e.g. occasional unpleasant odors)</p> <p>Very limited disruption caused to those earning their livings (e.g. no noticeable impact on heralding operations).</p> <p>Inconvenience experienced in accessing community facilities and utilities (e.g. electricity supply disruption for short (hours) period of time).</p> <p>Very limited impact on the wider economy at a local, regional and/or national scale (e.g. no discernable indirect and induced development).</p> <p>No impact on livelihood, community facilities and human health.</p> <p>It may be rare for Niger State FRILIA projects to have negligible social impact magnitude.</p>
Positive	+	<p>Beneficial improvement to human health.</p> <p>Benefits to individual livelihoods (e.g. additional employment opportunities).</p> <p>Improvements to community facilities/utilities.</p> <p>Increased economy (e.g. local procurement, sourcing of supplies).</p> <p>Typically, FRILIA is designed to ensure positive socio-economic impact on communities and farmers as seen from the various other toolkits designed to ensure the positive impacts of FRILIA is sustainably harnessed. These include Stakeholder Engagement, Outgrower, Involuntary Resettlement, Valuation and Compensation, Grievance Redress Mechanism, Community Needs Assessment and Development Plan, and Global Memorandum of Understanding.</p>

Receptor sensitivity: As stated above, in addition to characterizing the magnitude of impact, the other principal variable necessary to assign significance for a given impact is the value, and sensitivity/fragility of the receptor. This refers to economic, social, and/or environmental/ecological importance of the receptor, including reliance on the receptor by people for sustenance, livelihood, or economic activity, and to the importance of direct impacts to persons associated with the resource. The receptors-sensitivity designations commonly employed in E&S impact assessment process are low, medium and high which are universally acceptable. Samples of the typical sensitivity/fragility/value criteria for E&S receptors applicable to FRILIA projects are defined in Table 2.5.

Table 2.5 Sample of E&S Receptor-Sensitivity/Fragility/Value Criteria

Category	Ranking	Definition
<i>Physical Environment (for example, air quality)</i>		

Category	Ranking	Definition
High	3	All ambient conditions/concentrations exceed guideline limits and are indicative of the resource being impacted or polluted. There is no (or very little) assimilation capacity for increased concentrations/ change in conditions. An example is air pollution associated with livestock rearing or fertilizer application for crop plantations.
Medium	2	Some ambient conditions/concentrations exceed guideline limits while others fall within the limits. There is some small assimilation capacity for increased concentrations/ change in conditions. Resource use does affect other users. An example is the air pollution associated with aquaculture or land clearing stage for crop plantation.
Low	1	All ambient conditions/concentrations are significantly lower than guideline limits and there is capacity for assimilation for additional concentrations/ change in conditions. Resource use does not significantly affect other users. This may be rare for Niger State FRILIA projects based on their magnitude.
<i>Biological Environment (for example, terrestrial flora & fauna)</i>		
High	3	Specifically protected under Nigerian legislation and/or international conventions; listed as rare, threatened or endangered e.g., International Union for Conservation of Nature (IUCN). Considered to be of critical importance to the local use; and totally dependent on for livelihood or means of survival. An example is massive land clearing for forestry, ranching, or crop plantations.
Medium	2	Not protected or listed but may be a species common globally but rare in Nigeria with little resilience to ecosystem changes, important to ecosystem functions, or one under threat or population decline. Considered to be of moderate importance to the local use; and partially dependent on for livelihood or means of survival. An example is the land clearing associated with aquaculture farming.
Low	1	Not protected or listed as common / abundant, or not critical to other ecosystem functions. Considered to be of minor importance to the local use; and local communities do not depend on the resources for livelihood. This may be rare for Niger State FRILIA projects based on their magnitude.
<i>Socio-economic and health</i>		
High	3	Those affected will not be able to adapt to changes and continue to maintain pre-impact status. This can be associated with displacement and/or livelihood destruction and inadequate compensation. Typically, FRILIA is designed to avoid these potential negative impacts.
Medium	2	Able to adapt with some difficulty and maintain pre-impact status but only with a degree of support. This can be associated with displacement and/or livelihood destruction and inadequate compensation. Typically, FRILIA is designed to avoid these potential negative impacts.
Low	1	Those affected are able to adapt with relative ease and maintain pre-impact status. The aim of Niger State FRILIA projects is to ensure negative impact is as low as reasonably possible with a focus on enhancing positive impact.

Impact significance is the product of the impact magnitude and receptor sensitivity which is done using a matrix as shown in Figure 2.2 below. Qualitatively, the impact significance is then ranked on four (4) widely accepted levels: major, moderate, minor, or negligible.

Figure 2.2 Impact Significance Matrix

Impact Magnitude	4	4	8	12
	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	Receptor Sensitivity			

Based on its impact magnitude-receptor sensitivity/fragility/value score, each impact is then ranked into four (4) categories or orders of significance as illustrated in Table 2.6.

Table 2.6 Environmental Impact Significance Rankings

Ranking (Impact Magnitude x Sensitivity of Receptor)	Significance
9 - 12	Major
6 – 8	Moderate
3 – 5	Minor
1 – 2	Negligible

Negligible impacts are where a resource or receptor will not be affected in any way by a particular activity or the predicted effect is deemed to be ‘negligible’ or ‘imperceptible’ or is indistinguishable from natural background variations.

An impact of minor significance is one where an effect will be experienced, but the impact severity is sufficiently low (with or without mitigation) and well within accepted standards, and/or the receptor is of low sensitivity/value.



An impact of moderate significance is one within accepted limits and standards. Moderate impacts may cover a broad range, from a threshold below which the impact is minor, up to a level that might be just short of breaching a legal limit. The emphasis for moderate impacts is therefore on demonstrating that the impact has been reduced to a level that is as low as reasonably practicable (ALARP).

An impact of major significance is one where an accepted limit or standards may be exceeded, or high magnitude impact occurs to highly valued/sensitive receptors/resources.

Template 5 provides the potential E&S impacts and significance ranking associated with FRILIA projects. The impacts are based on project activities (pre-operations and operations). Although the Template is for a typical plant-based agriculture system, it can be modified as appropriate to suit other forms such as livestock rearing, poultry, agroforestry, aquaculture, etc. It is also not an exhaustive list and does not indicate the totality of impacts applicable to a FRILIA project. The Template only provides a guide as we understand that impacts are project specific.

Mitigation refers to measures or interventions necessary to avoid, minimize, reduce, or offset adverse impacts. The standard approach for selecting appropriate mitigation measures is:

- Avoid adverse impacts as far as possible by the use of preventive measures.
- Minimize or reduce adverse impacts to ALARP level; and
- Offset, remediate, or compensate for adverse impacts which cannot be mitigated or residual impacts which cannot be further reduced.

In proffering mitigation measures, preference should be given to avoidance or prevention of adverse impacts and where not feasible, measures which are practicable and cost-effective using the best available technology should be suggested while offset or compensation should be considered as the last resort.

Enhancement refers to the identification, management, and improvement of positive impacts. Enhancement of positive impact or opportunities should be managed with the development of adequate management plans and procedures as well as evaluation and monitoring tools to review progress.

The proposed recommendation for impact mitigation or enhancement measures (as shown in Template 6) should be based on the potential E&S impacts. Similarly, this Template is for a typical plant-based agriculture system and can be modified as appropriate to suit other forms such as livestock rearing, poultry, agroforestry,

aquaculture, etc. This is a non-exhaustive list and does not indicate the totality of recommendations applicable to project impacts. The table only provides a guide as we understand that recommendations vary by several factors such as the project specificity, scale, best available technology, sustainability, etc. Nonetheless, the overall aim is to ensure that the project-related impacts are mitigated to the barest minimum, avoided, or compensated for, while the opportunities are enhanced as much as practicable.

2.1.4 Stage 4 - Develop ESMP and Monitoring Programmes for Mitigation

An ESMP should be developed (outline shown in Template 7) for effective management of significant mitigation and enhancement measures. The ESMP shall be monitored, audited, reviewed, and improved as indicated in the paragraphs below. All other toolkits (SE, OFS, IRVC, GRM, GMoU, and CNDP) also have management plans which will be included in this ESMP if triggered.

For low-risk projects, where an ESIA was not triggered, approval will be sought from the Federal and State regulators (FMENV & Niger State Ministry of Environment) to develop an ESMP. Once granted, the ESMP should be developed using the outline provided in Template 7.

The E&S monitoring programme shall be produced from the ESMP to highlight the monitoring of compliance with mitigation measures. Template 8 shows the content of a typical monitoring programme in a tabular form including E&S parameters that would be monitored, the frequency, and the responsible party within the project management team. Similarly, the E&S monitoring programme will include the monitoring programmes of all other toolkits (SE, OFS, IRVC, GRM, GMoU, and CNDP). This will serve as the overall Monitoring and Evaluation Framework for the potential FRILIA project.

2.1.5 Stage 5 - Draft ESIA Report in line with Regulatory Guidelines

The most fundamental output of the ESIA process is an ESIA Report developed in line with national regulations and international best practices, especially the World Bank Environmental and Social Framework (ESF). The outline of an ESIA Report is shown in Template 9. Templates from all other toolkits (SE, OFS, IRVC, GRM, GMoU, and CNDP) will feed into the overall ESIA Report. Applicable sections/templates from other toolkits to be included in the ESIA Report has been discussed in the other toolkits.



2.1.6 Stage 6 - Obtain ESIA Permit for State and Federal Government

The product of the ESIA process is a permit from the FMENV and Niger State Ministry of Environment which serves as an approval of acceptance of the E&S risks, impacts, and mitigation measures proposed. It also serves as a seal of acceptance that other stakeholders (communities, media, the public) are satisfied with the ESIA approach and results.

2.1.7 Stage 7 - Implement Management Plans and Monitoring Programme

The FMENV, the National Environmental Standards and Regulations Enforcement Agency (NESREA), and the Niger State Environmental Protection Agency have mandated projects to submit evidence of the monitoring programme activities in Quarterly Reports; these reports are called the Environmental (and Social) Compliance Monitoring Reports which take the same outline as the E&S monitoring programme.

2.1.8 Stage 8 - Conduct Regulatory E&S Audit

The FMENV, NESREA, and Niger State Environmental Protection Agency have mandated projects to submit an Environmental (and Social) Audit Report (EAR) every three (3) years after commencement of operations. The EAR shall be developed in line with the National Guidelines for Environmental Audit in Nigeria of 2011 issued by NESREA. Template 10 shows the E&S Audit Reporting Template for a typical FRILIA project.

2.1.9 Stage 9 - Continuous Improvement of E&S Issues

The investor will ensure continuous improvement in practices addressing in E&S issues to align with global changes in best practices such as registering with the United Nations Global Compact (UNGC); indicating commitment to climate change issues by reporting on the Task Force on Climate-related Financial Disclosures (TCFD) and Carbon Disclosure Project; commitment to human rights by ensuring alignment of processes with the United Nations Guiding Principles on Human Rights; aligning and showing contributions to the achievement of the United Nations Sustainable Development Goals (UNSDGs); amongst others.

3 TEMPLATES FOR THE ESRM TOOLKIT

Templates		Description
ESRM Template 1	E&S Screening Categorisation	Covers the E&S screening criteria for FRILIA investments to be categorised as High (Category I), Medium (Category II), or Low Risk (Category III).
ESRM Template 2	Regulatory ESIA Process	Summarises activities within each step of the EIA process as mandated by the Federal Ministry of Environment (FMEnv) including the roles and responsibilities of the proponent, NSEPA and FMEnv.
ESRM Template 3	ESIA Baseline Data Collection Protocol (Environmental Parameters)	Includes guidelines and methodology for environmental data collection of the following parameters: climate, geology and hydrogeology, air quality and noise, surface and groundwater quality, aquatic biodiversity (hydrobiology), soil, land use, and terrestrial biodiversity (flora and fauna).
ESRM Template 4	ESIA Baseline Data Collection Protocol (Social Parameters)	Include guidelines and methodology for social data collection for the following parameters: demography, ethnicity, language, religion, vulnerable groups, administrative and socio-cultural institutions, migration trends and patterns, land acquisition, economics, livelihoods, community grievances and expectations, education, employment, health status and access to health services, security, culture, settlement pattern, and infrastructural services, and stakeholder engagement.
ESRM Template 5	Potential E&S Impacts and Significance Ranking	Covers the potential E&S impacts associated with FRILIA projects while the process of significance ranking would have been explained in the toolkit.
ESRM Template 6	Recommended Mitigation and	Outlines the proposed recommendation for impact mitigation or enhancement measures



	Enhancement Measures	
ESRM Template 7	Outline/Table of Contents for an ESMP	Provides the required content for an ESMP.
ESRM Template 8	E&S Monitoring Programme	Outlines expected content for such monitoring programme produced from the ESMP.
ESRM Template 9	ESIA Report Outline	Contains the ESIA report outline which will be developed in line with the FMENV Guidelines and World Bank Environmental and Social Framework (ESF).
ESRM Template 10	E&S Audit Reporting Template	Contains the auditing process and reporting guidelines in line with the National Environmental Standards and Regulations Enforcement Agency (NESREA) Guidelines for Environmental Audit, 2011.