



Republic of Benin



GULF OF GUINEA NORTHERN REGIONS SOCIAL COHESION PROJECT
(P175043)



ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

February 28, 2022



ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of the Republic of Benin (the “Recipient”) shall implement the Gulf of Guinea Northern Regions Social Cohesion Project (P175043) (hereinafter the “Project”) through the Technical Secretariat for Coordination of the Social Cohesion Project (Secrétariat Technique à Coordination du Projet de Cohésion Sociale, SETCO). The International Development Association (the “Association”) has agreed to provide funding for the Project.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. This ESCP sets out the material measures and actions to be carried out or caused to be carried out by the Recipient, including the timeframes for carrying out the actions and measures, the institutional, staffing, training, monitoring, and reporting arrangements, grievance management and the environmental and social assessments and instruments to be prepared or updated, consulted, disclosed, or re-disclosed, adopted, and implemented in accordance with the ESSs.
3. The Recipient shall also comply with the provisions of all other environmental and social documents required under the Environmental and Social Framework (ESF) and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF) incorporating the Pest Management Plan (PMP), the Resettlement Framework (RF), the Labor Management Procedures (LMP), the Stakeholder Engagement Plan (SEP), the Grievance Mechanism (GM), the Sexual Exploitation and Abuse /Sexual Harassment (SEA / SH) Prevention and Management Action Plan, the Security Risk Assessment (SRA) and the Security Management Plan (SMP); and all other instruments and deadlines specified.
4. The Recipient shall be responsible for compliance with all the requirements of the ESCP, even when the implementation of certain specific measures and actions is carried out by the ministries or agencies mentioned in paragraph 1 above.
5. The implementation of the material measures and actions defined in this ESCP shall be monitored and reported to the Association by the Recipient, in accordance with the requirements of the ESCP and the terms of the Legal Agreement, and the Association shall monitor and evaluate the progress and completion of these measures and actions throughout the Project implementation.
6. As agreed between the Association and the Recipient, this ESCP may be revised as necessary, during the Project implementation to reflect the adaptive management of Project changes and unforeseen circumstances, or in response to the assessment of the Project’s performance under this ESCP. In such circumstances, the Recipient shall accept the changes with the Association and revise the ESCP accordingly to reflect the agreed-upon changes. The agreement on the amendments to the ESCP shall be documented by the exchange of letters signed by the Association and the Recipient or its delegate. The Recipient shall promptly disclose the revised ESCP.

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
MONITORING AND REPORTING			
A.	<p>REGULAR REPORTING:</p> <p>The Recipient shall prepare and submit to the Association regular environmental and social monitoring reports indicating the performance of the Project, including but not limited to: (i) environment, social, health and safety (ESHS); (ii) ESCP implementation; (iii) stakeholder engagement activities, and operation of SEA / SH sensitive grievance mechanism (s); (iv) the preparation and implementation status of the E&S documents required under the ESCP.</p>	<p>Quarterly reports, starting from Effective Date, prepared throughout the implementation of the Project</p>	<p>Project Implementation Unit (PIU)</p>

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
<p>B</p>	<p>INCIDENTS AND ACCIDENTS: The Recipient shall promptly notify the Association any incident or accident related to the Project that has, or is likely to have, a significant negative impact on the environment, the affected communities, the public or Project workers. These incidents or accidents can be linked to: water and soil pollution, poisoning by pesticides, damage to the property of an individual or a community, the degradation of a particular ecosystem such as a protected area, incidents or accidents on the Project sites, land conflicts, labor migration, discrimination (for example, discrimination against women, young people, people with disabilities, and minority groups, migrating populations from other regions of the country or abroad), the exclusion of vulnerable or disadvantaged individuals or groups, cases of SEA / SH, working conditions, child labor, forced labor, handling of Project-related complaints, etc.</p> <p>The Recipient shall provide the Association with sufficient details regarding the incident and /or accident, indicating the immediate measures taken or planned to remedy it, including any other information provided by a contractor and/or supervising entity, where appropriate.</p> <p>Subsequently, upon request of the Association, the Recipient shall prepare a report on the incident or accident and propose measures to prevent its recurrence.</p>	<p>Notify the Association within 48 hours of becoming aware of the incident or accident.</p> <p>Ensure the provision of assistance to survivors of SEA / SH for medical care, psychosocial support and legal assistance by way of referral to relevant SEA / SH service providers in the Project area within 48 hours.</p> <p>This systematic reporting system shall remain in place throughout the Project implementation.</p> <p>A detailed report shall be prepared and provided within a maximum of 5 working days.</p> <p>The reporting of SEA / SH cases shall be based on the principle of confidentiality and security of the survivor's identity and shall be kept in a secure location with limited access.</p>	<p>PIU</p>
<p>C.</p>	<p>CONTRACTORS MONTHLY REPORTS: As part of the contractors and suppliers' contracts, contractors and suppliers are required to provide the PIU with monthly site monitoring reports on environmental, social, health and safety aspects.</p> <p>These monthly reports shall be sent to the Association by the Recipient upon request, as needed.</p>	<p>Monthly reports prepared from the signing of the contracts, and throughout the duration of Project's work.</p>	<ul style="list-style-type: none"> - PIU - Contractors - Services Provider/Suppliers

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MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
<p>1.1 ORGANIZATIONAL STRUCTURE:</p> <p>The Recipient shall create and maintain an organizational structure, the Project Coordination Unit (PIU) within the Technical Secretariat for Coordination of the Social Cohesion Project (SETCO), with qualified staff and appropriate resources to support the management of environmental, social, health and safety (ESHS) risks of the Project.</p> <p>The PIU shall recruit or appoint (i) an Environmental specialist, and a Social specialist (including SEA/SH aspects) to ensure the implementation of the E&S documents prepared under the Project; and (ii) a Security specialist, charged with all security monitoring/management aspects, including liaison with the armed forces, local communities, and security audits of the Project sites.</p> <p>SETCO, through its regional branches involved in the Project, will recruit E&S focal points to support the work of the E&S specialists of the national PIU. These specialists shall regularly report to the national PIU regarding the environmental and social compliance of activities at the local level.</p> <p>The qualifications, experiences, and terms of reference for the recruitment of all these E&S and security specialists shall be approved by the Association.</p> <p>The Recipient shall ensure, through the coordinator of the Project, that the specialists in environmental and social safeguards carry out their missions relating to the environmental and social management of the Project, including the prevention and management of the SEA/SH, and in accordance with the Project Implementation Manual (PIM).</p>	<p>The PIU shall be set up prior to the Project Effective Date.</p> <p>Environmental and social specialists within PIU's Regional branches shall be recruited not later than three (3) months after the Effective Date</p> <p>The organizational structure, including E&S and Security specialists, shall be maintained throughout the Project implementation.</p>	<p>- Technical Secretariat for Coordination of the Social Cohesion Project (SETCO) -PIU</p> <p>-PIU</p> <p>PIU</p>

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT:</p> <p>The Recipient shall prepare, consult, adopt, disclose, and implement the Environmental and Social Management Framework (ESMF) to identify and assess the risks and potential negative environmental and social impacts of the Project (including inter alia, security risks, SEA / SH), as well as appropriate mitigation measures. A particular emphasis shall be placed on consulting women’s groups to identify their needs and suggestions during the assessment and other vulnerable person or groups to ensure integration of their particular needs into the Project risks mitigation measures.</p>	<p>The Environmental and Social Assessment Instrument (ESMF) has been prepared, disclosed, consulted, and adopted on December 18, 2021, and shall be implemented thereafter throughout the Project implementation.</p> <p>Site-specific ESIA/ESMPs shall be prepared before implementation of the relevant Project activities and implemented throughout cycle of said activity.</p>	PIU

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<p>1.3</p>	<p>MANAGEMENT TOOLS AND INSTRUMENTS:</p> <p>The Recipient shall develop, disclose, consult upon, adopt, and implement the following risk assessment and management tools and instruments, in accordance with the ESSs and in a manner acceptable to the Association:</p> <ul style="list-style-type: none"> - Environmental and Social Management Framework (ESMF) including a Pest Management Plan (PMP); - Resettlement Framework (RF); - Resettlement Plan (s) (RP); - Labor Management Procedure (LMP); - Stakeholder Engagement Plan (SEP), including the Grievance Mechanism (GM) at Project level; - Security Risk Assessment (SRA) and the Security Management Plan (SMP); - Environmental and Social Impact assessments specific to each site (ESIA, with site-specific ESMPs, SEA/SH action plans, E&S audit (s), as needed); - SEA / SH Prevention and Management Action Plan 	<p>ESMF and RF have been developed, disclosed, consulted upon, and adopted on December 18, 2021, and December 14, 2021, respectively.</p> <p>SEP has been developed and disclosed before the Project Appraisal.</p> <p>The LMP has been developed, disclosed, consulted upon, and adopted on February 7, 2022.</p> <p>SRA has been developed and adopted before the Project Appraisal.</p> <p>The SMP shall be developed and adopted before the Project Effective Date.</p> <p>Site-specific instruments shall be prepared, disclosed, consulted upon, and adopted prior to the start of any activity requiring the development of a specific E&S instrument and shall be thereafter implemented throughout Project implementation</p> <p>The SEA / SH Prevention and Management Action Plan shall be developed, disclosed, consulted upon, and adopted no later than three (3) months after the Project Effective Date.</p> <p>All these instruments shall be implemented throughout the duration of the Project.</p>	<p>- PIU</p>

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
1.4	<p>MANAGEMENT OF CONTRACTORS:</p> <p>The Recipient shall incorporate the relevant aspects of this ESCP, including the relevant E&S and security documents and / or plans, as well as the LMP, into the ESHS specifications of the procurement documents and contracts with contractors and Supervising Engineers.</p> <p>The Recipient shall ensure that contractors and service providers (i) comply with the ESHS specifications of their respective contracts, and (ii) ensure that their subcontractors comply with the ESHS specifications of their respective contracts in accordance with the management tools and instruments referred to in section 1.3 above.</p>	<p>During the preparation of the procurement documents and before the signing of the contract and effective start of the relevant services or works.</p> <p>Implementation and maintenance of these measures throughout the Project implementation.</p> <p>Supervise contractors and supervising Engineers, throughout the Project implementation.</p>	- PIU

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<p>1.5</p>	<p>THIRD PARTY MONITORING: The Recipient shall mobilize, if necessary, local relevant regulatory authorities, technical institutions involved in the Project, NGOs, community organizations, etc. to complete or verify the monitoring information to monitor the environmental and social performance of the Project.</p> <p>The results of their monitoring shall be included in the quarterly reports which the Recipient shall prepare.</p> <p>The Recipient shall also recruit national or international experts to complete and verify the compliance of the risk management of SEA / SH and security risks as part of the Project, where appropriate, with terms of reference, qualifications, and experience acceptable to the Association.</p> <p>The Recipient shall require the third-party consultant, responsible for monitoring, to prepare and submit monitoring reports, which shall be promptly made available to and discussed with the Association and shall promptly take any measures that may be requested by the Association upon its review of the third-party monitor consultant reports.</p>	<p>Throughout the Project implementation</p>	<ul style="list-style-type: none"> - PIU - Third party monitor
<p>1.6</p>	<p>TECHNICAL ASSISTANCE: The Recipient shall ensure that consultations, studies, capacity, and skills building, training and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, which incorporate the relevant ESSs requirements.</p> <p>Ensure that any outputs of technical assistance activities are consistent with the ESSs.</p>	<p>Throughout the Project implementation</p>	<p>PIU</p>

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1.7	<p>CONTINGENT EMERGENCY RESPONSE COMPONENT (CERC) :</p> <p>a) The Recipient shall prepare a standalone CERC-ESMF and ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements including, if applicable, CERC-ESMF that has been included or referred to in the CERC Manual for the implementation of Contingent Emergency Response, in accordance with the ESSs and in a manner acceptable to the Association.</p> <p>b) In the event of a crisis leading to the activation of the CERC, the Recipient shall prepare, consult, adopt and disclose all E&S instruments that may be required for activities under the Contingent Emergency Response Component (CERC) of the Project, in accordance with the CERC Manual and, if applicable, CERC-ESMF and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.</p>	<p>a) The preparation and adoption of the CERC Manual and, where applicable, the standalone CERC-ESMF in a form, and substance acceptable to the Association is a condition of withdrawal condition under section [XXX] of Schedule 2 of the Financing Agreement for the Project.</p> <p>b) Submit the required E&S instrument to the Association's prior review and approval and adopt it prior to carrying out the relevant Project activities for which the E&S instrument is required.</p> <p>Implement the E&S instruments in accordance with their terms, throughout the Project implementation.</p>	- PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES:</p> <p>The Recipient shall develop, adopt, and implement Labor Management Procedures (LMP) prepared for the Project (including, inter alia, the prohibition of SEA / SH, child labor, and forced labor) in accordance with the requirements of ESS2 and in a manner acceptable to the Association.</p>	<p>The LMP has been developed and adopted on February 7, 2022 and will be implemented throughout the implementation of the Project.</p>	- PIU

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2.2	<p>PROJECT WORKERS' GRIEVANCE MECHANISM :</p> <p>The Recipient shall establish, maintain, and operationalize a Grievance Mechanism (GM) for Project workers, sensitive to SEA / SH, as described in the LMP, in accordance with the provisions of the ESS 2 and the applicable national legislation.</p> <p>The Recipient shall ensure that workers who use this GM are not subjected to any form of discrimination or retaliation from employers.</p>	<p>The GM shall be established, and operationalized prior to the recruitment of workers, and shall be maintained throughout the implementation of the Project.</p>	<ul style="list-style-type: none"> - PIU
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES :</p> <p>The Recipient shall prepare, adopt, and implement the occupational health and safety (OHS) measures specified in the ESIA / ESMP and ensure that the Project contractors develop and implement an OHS plan, all in accordance with ESS 2 and in a manner acceptable to the Association.</p>	<p>The final OHS plan shall be established before the start of the works. These measures shall be maintained throughout the implementation of the Project.</p>	<ul style="list-style-type: none"> - PIU - Supervising Engineer. - Contractors and suppliers
2.4.	<p>EMERGENCY PREPAREDNESS AND RESPONSES</p> <p>The Recipient shall adopt and implement emergency preparedness and response measures and reflect those measures in the Project ESMF and ESIA / ESMP.</p> <p>The Recipient shall ensure that the Project Contractors prepare, adopt, and implement an emergency preparedness and response plan. The emergency circumstances of each sub-project shall be identified in the ESIA reports and the contractor's ESMP (C-ESMP) or in an ESMP for community-driven development work (CDD), as well as the measures for their prevention and management shall be notified in said reports.</p> <p>The Recipient shall immediately report any major emergency (e.g., spills, attacks, pollution, accidents causing significant damage) in accordance with section B of this ESCP.</p>	<p>Before the start of the works and throughout the implementation of the Project.</p>	<ul style="list-style-type: none"> - PIU - Supervising Engineer - Contractors and suppliers

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
ESS 3: RESOURCES EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:			
3.1	<p>POLLUTION PREVENTION AND MANAGEMENT:</p> <p>Waste and Hazardous Materials Management: The Recipient shall develop, adopt, implement measures, and reflect those measures in the Project ESMF and ESIAs / ESMPs, to manage waste and hazardous materials in accordance with ESS 3 and in a manner acceptable to the Association.</p> <p>The Recipient shall ensure that the contractors develop, adopt, and implement a waste and hazardous materials management plan (common and specific waste) in accordance with the provision of the ESMF and site specific ESIA/ESMP, in a manner acceptable to the Association.</p> <p>Pesticides management:</p> <p>The Recipient shall ensure that the prevention and management measures for risks and potential impacts provided for in the Pest Management Plan (PMP), included in the Project ESMF, are applied in a manner acceptable to the Association.</p>	<p>The measures shall be adopted before the actual start of the relevant works.</p> <p>These measures and actions shall be maintained and implemented throughout the implementation of the Project.</p>	- PIU
3.2	<p>RESOURCE EFFICIENCY :</p> <p>The Recipient shall develop, adopt, implement rationalization measures on raw materials, energy and water use and the maintenance of its quality, and reflect those measures in the Project ESMF and ESIAs/ESMPs, to manage efficient consumption of these resources in accordance with ESS3 and in a manner acceptable to the Association.</p>	<p>The measures shall be adopted before the start of works and implemented and maintained throughout the Project implementation.</p>	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
ESS 4: COMMUNITY HEALTH AND SAFETY			

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY /ENTITY
4.1	<p>TRAFFIC AND ROAD SAFETY:</p> <p>The Recipient shall and shall ensure that contractors / supervising entities develop, adopt, and implement measures and actions to assess and manage the risks related to traffic and road <i>safety</i> (including, among others, a road traffic and safety plan, in particular a plan for the movement of construction equipment and detour routes), in accordance with ESS 4 requirements.</p>	<p>Before the start of works and maintained throughout the Project implementation.</p>	<ul style="list-style-type: none"> - PIU - Supervising engineer - Contractors
4.2	<p>COMMUNITY HEALTH AND SAFETY :</p> <p>The Recipient shall ensure the contractors / supervising entities develop, adopt, and implement measures and actions to assess and manage the following Project-related risks and impacts, in accordance with ESS 4 requirements and in a manner acceptable to the Association:</p> <p>SEA / SH risks</p> <p>The Recipient shall develop, disclose, consult upon, adopt, and implement the SEA/SH prevention and mitigation action plan referred to in section 1.3 above.</p> <p>Risks associated with the spread of COVID-19</p> <p>The Recipient shall develop, disclose, consult upon, adopt, and implement the action plan as part of the ESIA/ESMP for the prevention and management of risks related to the spread of COVID-19, prepared to manage this risk on all Project work sites.</p> <p>Security risks</p> <p>The Recipient shall assess the security risks and, thereafter, develop, adopt, and implement the standalone Security Management Plan (SMP), prepared for the Project, to manage the risks of recurring security incidents and threats under the Project, all in accordance with the requirements of ESS 1 and ESS 4 in a manner acceptable to the Association.</p>	<p>Prior to the start of the effective work. These measures shall be maintained throughout the implementation of the Project.</p> <p>The SEA / SH Prevention and Management Action Plan shall be developed, disclosed, consulted upon, and adopted no later than three (3) months after the Project Effective Date.</p> <p>Three (3) months after Project Effective Date and throughout the Project implementation. The COVID-19 prevention action plan shall be updated as necessary to respond to the contexts of the sub-project areas.</p> <p>The SMP shall be developed and adopted prior to the Project Effective Date and implemented throughout the implementation of the Project. The action plan shall be updated as needed, depending on the evolution of the security context of the sub-project areas.</p>	<ul style="list-style-type: none"> - PIU - Supervising engineer - Contractors

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY /ENTITY
<p>4.3</p> <p>SECURITY PERSONNEL</p> <p>The Recipient shall prepare, adopt, and implement a stand-alone Security Management Plan (SMP), based on the Security Risk Assessment (SRA) in accordance with the requirements of ESS 4, in a manner acceptable to the Association.</p> <p>The following measures shall be adopted to ensure that the engagement to security or personnel (in the implementation of Project activities), for provision of security of Project workers, sites and / or assets, is carried out in accordance with ESS 4:</p> <p>a. Assess the risks and impacts of engaging security personnel and implement measures to manage these risks and impacts, (including a stand-alone security risk management plan), guided by the principles of proportionality and good international industry practices, and by applicable law, with regard to the recruitment, rules of conduct, training, equipping and monitoring of such security personnel;</p> <p>b. Adopt and apply standards, protocols and codes of conduct for the selection and use of security personnel, and screen such personnel to verify that they have not engaged in illegal or abusive behavior in the past, including SEA / SH or excessive use of force;</p> <p>c. Ensure that such personnel are properly instructed and trained, prior to deployment and on a regular basis, on the use of force and proper conduct, as outlined in the Project Operational Manual, the ESMF, and the Security Management Plan ;</p> <p>d. Ensure that the stakeholder engagement activities under the SEP include a communication strategy on the involvement of security personnel in the Project;</p> <p>e. Ensure that any concerns or grievances regarding the conduct of security personnel are received, monitored, documented (considering the need to protect confidentiality), resolved through the Project grievance mechanism (see action 10.2 below) and reported to the Association no later than two (2) days after being received; and</p> <p>f. When the Association so requires, after consultation with the Recipient: (i) promptly appoint a third-party monitoring consultant, whose terms of reference, qualifications and experience are satisfactory to the Association, in order to visit and monitor the Project area where security personnel are deployed, collect relevant data and communicate with Project stakeholders and beneficiaries; (ii) request the third-party consultant in charge of monitoring to prepare and submit monitoring reports, which shall be quickly made available to the Association and discussed with it; and (iii) promptly take any action requested by the Association after examining the reports of the monitoring third party consultant.</p>	<p>Before the effective start of activities</p> <p>During and after the execution of the Project.</p>	<ul style="list-style-type: none"> - PIU - Contractors - -Security services - Supervising entity or consultant 	

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ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
<p>5.1</p> <p>RESETTLEMENT FRAMEWORK AND RESETTLEMENT PLANS:</p> <p>The Recipient shall develop, disclose, consult, adopt, and implement a Resettlement Framework (RF) for the Project, in accordance with ESS 5, while ensuring that women and other vulnerable individuals and groups have equal access to resettlement-related opportunities and compensation and that any risks, potentially associated with resettlement are considered in the RF, in a manner satisfactory to the Association.</p> <p>Where appropriate, develop, disclose, consult, adopt and implement a site-specific Resettlement Plan (RP), for identified sites as provided in the RF and consistent with ESS 5. All RPs shall be approved by the Association and disclosed nationally and on the website of the Association’s Website.</p> <p>The Recipient shall inform the Association of all voluntary donations of land before their acquisition. The Recipient shall verify and document the conditions foreseen in the ESS 5 for the donation of land.</p>	<p>RESETTLEMENT FRAMEWORK AND RESETTLEMENT PLANS:</p> <p>The RF has been prepared, disclosed, consulted, and adopted on December 14, 2021, and will be implemented throughout the Project implementation.</p> <p>Disclose, adopt, and then implement the respective RP, before the start the Project activities or works to which the RP relates.</p>	<ul style="list-style-type: none"> - PIU - National Agency of Domains and Land (ANDF) housed within the Ministry of the Economy and Finance. 	
<p>5.2.</p> <p>MONITORING AND REPORTING:</p> <p>The Recipient shall prepare an implementation report for the monitoring of any land acquisition and resettlement activities.</p> <p>This report shall be submitted to the Association for approval before the start of relevant works.</p>	<p>Before the start of relevant works.</p>	<ul style="list-style-type: none"> - PIU - Implementing agency - NGO 	

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5.3	<p>GRIEVANCE MECHANISM (GM):</p> <p>The Recipient shall ensure that the Project RF and site-specific RPs reflect the Project GM, and are sensitive to SEA/SH, to which complaints and comments on involuntary resettlement associated with the Project may also be addressed.</p> <p>This GM shall be operational and accessible to all those affected by land acquisition and resettlement activities.</p>	Before the start of RP implementation	<ul style="list-style-type: none"> - PIU - Implementing agency - NGO
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS:</p> <p>The Recipient shall implement the biodiversity management measures set out in the Project ESMF and the ESIA / ESMP in a manner acceptable to the Association.</p> <p>Where a site-specific ESIA / ESMP identifies significant impacts on biodiversity, the Recipient shall prepare, adopt, and implement a Biodiversity Management Plan.</p> <p>Specific E&S instruments shall be submitted to the Association for approval before launching procurement documents and contracts with contractors and supervising entities.</p>	Before the start of Project activities.	<ul style="list-style-type: none"> - PIU
ESS 7: INDIGENOUS PEOPLES/ SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Not applicable to the Project		
ESS 8: CULTURAL HERITAGE			

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8.1	<p>CHANCE FINDS:</p> <p>The Recipient shall develop, adopt, and implement a management plan for the cultural heritage that may be affected by the Project, if any, as well as procedures relating to chance finds as described in the ESMF. Clauses on these “chance finds” shall be included in all works contracts, even in cases where the probability is very low.</p> <p>This “chance finds” procedure shall also be carried out by the PIU, in collaboration with the communities for the activities to be implemented by the community workers and as part of the CDD approach.</p> <p>The ESMF proposes a procedure in the event of the “chance finds” of cultural remains, in accordance with national legislation and the practices of the ministry responsible for culture. Likewise, the ESIA / ESMP to be prepared shall include such a section on cultural heritage. These measures shall be consistent with e ESS 8 requirements.</p>	Before the start and throughout the work.	PIU
ESS 9: FINANCIAL INTERMEDIARIES			
	Not applicable to the Project		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>PREPARATION AND IMPLEMENTATION OF THE STAKEHOLDER ENGAGEMENT PLAN:</p> <p>The Recipient shall prepare, disclose, consult upon, adopt, and implement a Stakeholder Engagement Plan (SEP) including measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation, all in accordance with ESS10 and in a manner acceptable to the Association.</p> <p>The Recipient shall recruit a local NGO or a local specialized agency to support the implementation and monitoring of the SEP.</p>	<p>The SEP has been disclosed prior to Project Appraisal and shall be finalized and adopted prior to the Effective Date.</p> <p>SEP shall be implemented throughout the Project implementation.</p>	- PIU

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<p>10.2</p>	<p>PROJECT GRIEVANCE MECHANISM (GM):</p> <p>The Recipient shall establish, disclose, maintain, and operate an accessible Grievance Mechanism (GM), to receive and facilitate the resolution of concerns and grievances related to the entire Project, promptly and effectively, in a transparent manner, culturally appropriate and readily accessible manner to all Project-affected-parties, at no cost and without retribution, including concerns and grievances filed anonymously, all in accordance with ESS 10.</p> <p>The GM shall also receive, register, and address concerns and complaints related to SEA / SH in a safe and confidential manner, with specific entry points for survivors and shall ensure a referral system to provide assistance to survivors as required, through identified GBV service providers in the Project area.</p> <p>The GM shall be supported by a communication plan to ensure that the local populations affected by the Project are aware of the existence of this mechanism and know the procedures for filing and handling complaints and other remedies.</p>	<p>The GM shall be operational prior to the Effective Date.</p> <p>The GM shall be maintained and shall remain operational throughout the implementation of the Project</p>	<ul style="list-style-type: none"> - PIU - Psychosocial and legal assistance centers
<p>CAPACITY BUILDING (TRAINING)</p>			

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<p>CB1</p>	<p>Training on environmental and social standards :</p> <ul style="list-style-type: none"> - ESS 1 : Assessment and management of environmental and social risks and impacts - ESS 2: Labor and working conditions and the Labor Management Procedures (LMP) - ESS 3: Resource efficiency and Pollution Prevention and Management - ESS 4: Community health and safety and security management plan (SMP) - ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement - ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources - ESS 8: Cultural heritage - ESS 10: Stakeholder engagement and information disclosure and the Stakeholder Engagement Plan <p>The training should target the following stakeholders:</p> <ul style="list-style-type: none"> - Project Steering Committee / Regional Coordination Committee (RCC) - PIU (Social specialist, Environmental specialist, Security specialist, Procurement specialist) - Environmental and Social Focal Points in local level - NGO working in the environmental and social fields in the Project areas - -Relevant Technical entities - Benin Environmental Agency (ABE) - Relevant territorial authorities. 	<p>Three (3) months after the recruitment of environmental, social and security specialists, and once every six (6) months throughout the implementation of the Project</p>	<p>PIU with the support of other consultants/ Training Center engaged by the Project if necessary.</p>
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<p>CB2</p>	<p>Occupational health and safety training: Contractors and supervising entities shall train all workers involved in Project activities, including security personnel, on occupational health and safety, first aid equipment, prevention of emergencies and how to prepare for and react to such situations. Contractors shall also ensure that the workers of their subcontractors are trained on the same subjects. The training should target the following stakeholders: - Contractors - Contractor’s workers (including any subcontractors) -Community workers - Supervising entities - PIU</p> <p>Information, Education and Communication (IEC) Raise awareness among contractors’ workers, including subcontractors’ workers, community workers, and supervising entity mobilized on the sites to the environmental and social standards as well as on respect for of anti-COVID-19 barrier gestures.</p>	<p>Prior to the start of employment of newly recruited workers and those already working, training would be provided quarterly to ensure that all staff are trained.</p> <p>Throughout the Project implementation</p>	<p>- PIU</p>
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<p>CB3</p>	<p>Training on labor and working conditions</p> <ul style="list-style-type: none"> - Conditions of employment under national labor law; - Code of conduct for suppliers / service providers and subcontractors; - - workers' organizations; - - Rules on child labor and minimum working age; - - Workers' rights; - -Worker complaints and SEA / SH complaints - -Discrimination and harassment (SEA / SH) incidence at work. <p>The training shall target the following actors:</p> <ul style="list-style-type: none"> - Contractor's workers (including any subcontractors) - Community workers; - Supervising Engineers; - NGOs working in the social field in the Project area. 	<p>Before the start of employment of newly recruited workers and those already working, training shall be provided quarterly to ensure that all staff are trained.</p>	<p>- PIU</p>
<p>CB4</p>	<p>Training on environmental and social management</p> <p>This training shall provide knowledge on:</p> <ul style="list-style-type: none"> - the process of environmental and social selection and classification of sub-projects; - the procedures for organizing and carrying out the ESIA and the RP; - environmental policies, procedures and legislation in Benin; - Implementation monitoring process of the ESMP and the RP. <p>The training shall target the following actors:</p> <ul style="list-style-type: none"> -PIU (social specialist, environmental specialist, security specialist, procurement specialist) -Central and local technical structures involved in the Project; - ABE 	<p>Prior to the start of employment of newly recruited workers and those already working, training would be provided annually to ensure that all staff are trained.</p>	<p>- PIU</p>

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<p>CB5</p>	<p>Training on grievance mechanism</p> <p>The training shall focus on the following modules:</p> <ul style="list-style-type: none"> - Registration and processing procedure; - Complaints’ resolution procedure; - Documentation and handling of complaints; - Use of the procedure by the various stakeholders; - SEA / SH complaints. <p>The training shall target at the following actors:</p> <ul style="list-style-type: none"> - PIU (social and environmental specialists, security specialist, procurement specialist) - Local or regional committees for monitoring or grievance management committees. - Representatives of local communities - Relevant Technical entities - Relevant territorial local authorities concerned - NGO working in the social field in the Project area. 	<p>Prior to the start of employment of newly recruited workers and those already working, training shall be provided quarterly to ensure that all staff are trained.</p>	<p>- PIU</p>
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<p>CB6</p>	<p>SEA / SH Risk Training</p> <ul style="list-style-type: none"> - Awareness and measures to prevent and mitigate the risks of SEA / SH ; - Themes, activities, and target audiences shall be defined in the SEA / SH action plan; - -Dissemination of the SEA / SH action plan (activities, target groups); - SEA / SH complaint handling <p>The training shall target the following actors:</p> <ul style="list-style-type: none"> - PIU (environmental and social specialists, security specialist, procurement specialist, monitoring and evaluation specialist), - Relevant Central and local technical entities, - ABE - Relevant local authorities and communities ; - NGOs working in the social field in the Project area. 	<p>Prior to the start of employment of newly recruited workers and those already working, training would be provided quarterly to ensure that all staff, actors, and stakeholders involved are trained.</p>	<ul style="list-style-type: none"> - PIU
<p>CB7</p>	<p>Training on risks and management during works targeting workers</p> <ul style="list-style-type: none"> -SEA / SH, child and forced labor; - GM - including the SEA / SH related grievance mechanism; - Compliance with the code of conduct clearly mentioning the prohibition of SEA / SH and the penalties in the event of misconduct, etc. -Pollution and damage during the Project works, -Occupational Health and Safety. 	<p>Before the start of work and organize regular refresher sessions</p>	<ul style="list-style-type: none"> - PIU - Contractors
<p>CB8</p>	<p>Information / awareness on potential environmental and social risks targeting local populations / communities:</p> <p>Information / awareness on potential environmental and social risks, including the Project SEA / SH, to elicit their commitment and participation in the identification of measures aimed at minimizing and mitigating negative environmental and social risks and impacts related to Project implementation.</p>	<p>Before the start of the works and throughout the implementation of the Project</p>	<ul style="list-style-type: none"> - PIU - Contractors - Supervising engineer / supervising entity