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## Republic of Benin

Ministry of Agriculture, Livestock and Fisheries

# Additional Financing to Agricultural Competitiveness and Export Diversification Project (P180505) and Agricultural Competitiveness and Export Diversification Project -P168132

## For Negotiations ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

May 9, 2024

### **ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

- 1. The Republic of Benin (the Recipient) is implementing the Agricultural Competitiveness and Export Diversification Project (P168132) (the Project), with the involvement of the Ministry of Agriculture, Livestock and Fisheries (MAEP), as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide the Original Financing (P168132) and Additional Financing (P180505) for the Project, as set out in the referred agreements. This ESCP supersedes the previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for Project referred to above.
- 2. The Recipient shall ensure that the Project is carried out in accordance with Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, the capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
- 3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
- 4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the Ministry of Agriculture, Livestock and Fisheries and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient, represented by the Minister of Economy and Finance. The Recipient shall promptly disclose the updated ESCP.

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY	
MONITORING AND REPORTING				
A	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) aspects; (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.	Submit quarterly reports to the Association, throughout Project implementation starting from the Effective Date.  Submit each report to the Association no later than fifteen (15) days after the end of each reporting period as it is the case for the parent Project.	Project Management Unit within MAEP (PMU)	
В	INCIDENTS AND ACCIDENTS  Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse 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  Provide the Association with sufficient details regarding the incident and /or accident, indicating the immediate measures taken or planned to remedy it,	Notify the Association not later than 48 hours of becoming aware of the incident or accident and not later than 24 hours in cases of fatality or SEA/SH.  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 in accordance with the SEA/SH prevention and management action plan.	PMU	
	including any other information provided by a contractor and/or supervising entity, where appropriate.  Subsequently, upon request of the Association, prepare a detailed report on the incident or accident and propose measures to address it and prevent its			

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	recurrence. This requirement has been implemented under the parent project and will continue to be implemented also for the additional financing.	Provide subsequent report to the Association within a maximum of five (5) working days of becoming aware of the incident or accident, unless a different timeframe is agreed with the Association. 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.  This systematic reporting system shall remain in place throughout the Project implementation.	
C. ESS 1:	CONTRACTORS MONTHLY REPORTS  For the Additional Financing and as in the Parent Project, require contractors, suppliers, and supervising firms to provide monthly site monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.  ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND II	Submit monthly reports to the Association, and as annexes to the reports to be submitted under Action A above (quarterly report), from the signing of the contracts, and throughout the duration of Project's works.	<ul><li>PMU</li><li>Contractors</li><li>Services</li><li>providers/</li><li>suppliers</li></ul>
1.1	ORGANIZATIONAL STRUCTURE  The Parent Project has set up an organizational structure, the Project  Management Unit (PMU) with qualified personnel and appropriate resources to support the management of environmental, social, health and safety (ESHS) risks of the Project. The PMU will be equipped with a Monitoring-Evaluation and Environment Unit which will include staff recruited as part of the Parent Project, in particular the Environmental Safeguards Specialist (SSEnv) and the Social Development and Gender Specialist (SDSG) to ensure the implementation of the E&S documents prepared under the Additional Financing.	The PMU set up under the Parent Project shall be maintained until the Closing Date of the Project, as set out in the Financing Agreement.	PMU

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	This unit will oversee monitoring the environmental and social measures to be implemented by the service providers' teams with which the PMU will conduct the Project activities.  The E&S specialists will be maintained, and the Monitoring-Evaluation and Environment Unit will be equipped with qualified additional staff and sufficient resources to support the risks and impacts management of the Project, in particular: i) a Specialist in Environmental Safeguards and ii) a Specialist in Social Development and Gender.  Just like in the Parent Project, 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 this ESCP, Financing Agreement, and the Project Implementation Manual (PIM).	The two (2) additional environmental and social specialists within the PMU shall be recruited no later than three (3) months after the Effective Date of the additional financing of the Project.  The organizational structure, including E&S specialists, shall be maintained throughout the Project implementation.	
1.2	<ol> <li>Adopt and implement, if necessary, an environmental and social impact assessment (ESIA), and prepare and implement the corresponding Environmental and Social Management Plan (ESMP) for the subprojects/activities that require it, in particular the sub-projects under components 1, 2 and 3 of the Project, consistent with the relevant ESSs;</li> <li>Adopt and implement an environmental and social management framework (ESMF), consistent with the relevant ESSs;</li> </ol>	1. Site-specific ESIA/ESMPs shall be prepared, disclosed, consulted, and adopted before implementation of the relevant Additional Financing activities and implemented throughout the implementation of the said activity.	PMU

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	<ol> <li>Ensure that the implementing agencies, contractors, subcontractors, and supervising engineer associated with the sub-projects adopt and implement the ESIA and the ESMP specific to the site of the sub-project, as set out in the ESMF. The activities of the proposed sub-projects described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</li> <li>Adopt Sectoral Strategic Environmental and Social Assessments (SESA) to integrate environmental and social issues into future reform-related investment programs/projects; assess the environmental and social risks and impacts associated with the implementation of the reform and establish the framework for environmental and social assessments for further projects that will derive from the National Seed Sector Strategy, and the new National Agricultural Investment and Food and Nutritional Security Plan.</li> </ol>	<ol> <li>The ESMF developed, disclosed, consulted upon, and adopted on 3 May 2020 shall be updated, disclosed, consulted and adopted no later than one month after Effective Date of the additional financing of the Project and be implemented thereafter throughout Project implementation.</li> <li>Adopt the ESMP before launching the bidding process for the respective subprojects/activities before implementing the projects/activities that require the adoption of an ESMP.</li> <li>The SESA shall be prepared, adopted and disclosed no later than six months after Effective Date of the additional financing of the Project</li> </ol>	
1.3	Incorporate the relevant aspects of the ESCP, including inter alia the relevant E&S instruments and security documents and / or plans, as well as the labor management procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising Engineer, as in the Parent Project.	During the preparation of the procurement documents and before the signing of the contract and effective start of the relevant services or works, like the parent project. Throughout the Project implementation.  Supervise contractors and supervising Engineers, throughout the Project implementation.	PMU

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	As in the Parent Project, the Recipient shall continue to 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 E&S instruments referred to in section 1.2 above with regard to additional financing.		
1.4	TECHNICAL ASSISTANCE  Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity-building activities, training, and any other technical assistance activities under of the Project, including, inter alia potential environmental and social instruments to be supported under the TA, are carried out in accordance with terms of reference acceptable to the Association and consistent with the ESSs.  Ensure that any outputs of technical assistance activities are consistent with terms of reference.	Throughout Project implementation	PMU
1.5	a) Ensure that the CERC Manual includes a description of the ESHS risk assessment and management arrangements, including, if applicable, the CERC-ESMF that will be included or referred to in the CERC Manual for the implementation of the CERC component, in accordance with the ESSs.  b) Adopt any environmental and social instruments that may be required for activities under the CERC Component of the Project, in accordance with the CERC Implementation Manual and the ESMF-CERC and the ESSs, and thereafter implement the measures and actions required under said environmental and social instruments, within the timeframes specified in said E&S instruments	<ul> <li>a) The adoption of the CERC Manual in form and substance acceptable to the Association, is a withdrawal condition under Section I.D of Schedule 2 of the Financing Agreement for the Project.</li> <li>b) Adopt any required E&amp;S instruments and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&amp;S instruments is required. Implement the E&amp;S instruments in accordance with their</li> </ul>	PMU     Designated authority for the CERC

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
		terms, throughout Project implementation.	
ESS 2:	LABOR AND WORKING CONDITIONS		
2.1	LABOR MANAGEMENT PROCEDURES  The labor management procedures (LMP) prepared and adopted for the parent Project (including, inter alia, the provisions on working conditions, management of the employer-worker relationship, occupational health and safety (including personal protective equipment and emergency preparedness and response), code of conduct (including relating to sexual exploitation and abuse as well as sexual harassment), forced labor, child labor, migrant workers, the grievance mechanism and applicable requirements for contractors, subcontractors and supervising firms) shall be updated to take into account the discrimination or exclusion of vulnerable persons and communities in accordance with the requirements of ESS2 and in a manner acceptable to the Association.	The LMP developed, disclosed and adopted on 30 April 2020, shall be updated, disclosed, consulted and adopted no later than one month after Effective Date of the additional financing of the Project and be implemented throughout the Project implementation.	PMU
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS  Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with the provisions of ESS2.  The Grievance Mechanism (GM) developed for Project workers in the LMP of the Parent Project, shall be updated to take into account, in addition to SEA / SH, specificities relating to vulnerable persons and to new intervention communities where additional financing activities take place, as described in the LMP, and consistent with the provisions of ESS 2 and the applicable national legislation.  Ensure that workers who use this GM are not subjected to any form of discrimination or retaliation from employers.	The GM established, and operationalized under the Parent Project shall be updated, disclosed, consulted and adopted no later than one month after Effective Date of the additional financing of the Project and shall be maintained throughout the implementation of the Project.	PMU
	RESOURCES EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:		
3.1	RATIONAL USE OF RESOURCES:		PMU

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	Develop, adopt, implement rationalization measures on raw materials, energy and water use and the maintenance of its quality, and reflect those measures in the updated ESMF and ESIAs/ESMPs to be prepared under Action 1.2 above for the sub-projects/ activities, to manage efficient consumption of these resources in accordance with ESS3 and in a manner acceptable to the Association.	Before the start of construction works and implemented and maintained throughout the Project implementation.	
3.2	POLLUTION PREVENTION AND MANAGEMENT  Waste and Hazardous Materials Management:  Update, adopt, implement measures, and reflect those measures in the ESMF and ESIAs / ESMPs, to manage waste and hazardous materials in accordance with ESS 3 and in a manner acceptable to the Association.	Before the actual start of construction works. These measures and actions shall be maintained and implemented throughout the Project implementation.	PMU
	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.  Pesticides management:	The same timeframe as for the adoption and implementation of the ESMP.	
	The Pest Management Plan (PMP) prepared for the Parent Project, shall be updated to take into account the related risk of agrochemical use of additional agricultural speculations, in accordance with the requirements of ESS3 and in a manner acceptable to the Association.  Ensure that prevention and management measures for risks and potential impacts provided in the PMP, are implemented in accordance with ESS3 and in a manner acceptable to the Association.	The PMP developed, disclosed, consulted upon, and adopted on 3 May 2020 shall be updated, disclosed, consulted and adopted no later than one month after Effective Date of the additional financing of the Project and be implemented thereafter throughout Project implementation.	
<b>ESS 4:</b> 4.1	COMMUNITY HEALTH AND SAFETY TRAFFIC AND ROAD SAFETY		
4.1	THATTIC AND NOAD SAFELT		PMU

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	As in the parent Project, ensure that contractors / supervising entities develop, adopt, and implement measures and actions to assess and manage the risks related to traffic and road safety (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.	Before the start of construction works and throughout the Project implementation.	
4.2	The Recipient shall and shall ensure the contractors / supervising entities to, develop, adopt, and implement measures and actions to assess and manage the following additional financing-related risks and impacts, in accordance with ESS 4 requirements, taking into account exposure to substances that may be causes by the Project, the influx of labor and migrant workers, the risks of GBV / SEA / SH and violence against children, behavior of Project workers in relation to the respect of the customs and customs of the communities, security risks of labor influx, response to emergency situations, and include mitigation measures in the ESMP to be prepared in accordance with the ESMF, and in a manner acceptable to the Association.	Same timeframe as for the adoption and implementation of the ESMPs.	PMU
4.3	RISKS OF SEXUAL EXPLOITATION AND ABUSE AS WELL AS SEXUAL HARASSMENT  Adopt and implement an SEA / SH action plan as provided for in Action 1.2 and contained in the ESMP to assess and manage the risks of SEA / SH.	The SEA / SH action plan was disclosed on 31 March 2022 and is being implemented throughout the implementation of the Project.	PMU
4.4	Security risks  The Recipient shall prepare the security risks assessment and, thereafter, update, adopt, and implement the Security Management Plan (SMP), for the Project, to manage the risks of recurring security incidents and threats under the additional financing and taking into account the context of the new intervention communities, in accordance with the requirements of ESS 1 and ESS 4 in a manner acceptable to the Association.	Adopt a SMP prior to starting relevant works and implement throughout the Project implementation.	PMU

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
		The action plan shall be updated as necessary, according to the evolution of the security context of the additional financing subprojects areas.	
ESS 5:	LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEN	I ΛΕΝΤ	
5.1	RESETTLEMENT POLICY FRAMEWORK  The Resettlement Policy Framework (RF) prepared for the Parent Project shall be updated, 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.	The RPF developed, disclosed, consulted upon, and adopted on 3 May 2020 shall be updated, disclosed, consulted and adopted no later than one month after Effective Date of the additional financing of the Project and be implemented thereafter throughout Project implementation.	PMU
5.2	RESETTLEMENT PLANS  Adopt and implement a resettlement action plan (RAP) for each Project activity for which the resettlement policy framework requires such action plan, as indicated in the RPF, and consistent with ESS 5.	Adopt and implement the respective Resettlement Action Plans or Audits including ensuring that, before taking possession of the land and related assets, full compensation has been provided and, if necessary, displaced persons have been resettled and relocation allowances have been granted before any use of the sites considered for Project activities.	PMU
5.3	GRIEVANCE MECHANISM  Ensure that the Grievance Mechanism (GM) related to the relocation is reflected in the Project RPF, site-specific RAP and SEP and take into account the SEA/SH. This GRM must be operational and accessible to all those involved in land acquisition and resettlement activities.	Before the start of the implementation of the RAP or Audit, and then throughout the Project implementation.	PMU

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
6.1	BIODIVERSITY RISKS AND IMPACTS  Adopt and implement biodiversity management measures as described in the ESMF, in application of the ESIA guidelines prepared for the Project activity, and consistent with ESS 6.  Where a site-specific ESIA / ESMP identifies significant impacts on biodiversity, the Recipient shall prepare, adopt, and implement a Biodiversity Management Plan.	Same timeframe as for the adoption and implementation of the ESMF and ESIAs/ESMPs., thereafter implementation of these measures throughout Project implementation.	PMU
<b>ESS 8:</b>	CULTURAL HERITAGE		
8.1	CULTURAL HERITAGE RISKS AND IMPACTS  Adopt and implement a Cultural Heritage Management Plan (likely to be affected by the Project, if applicable), as described in the ESMF, in application of the ESIA and ESMP guidelines prepared for the Project activity and in accordance with ESS8.	Adopt the Cultural Heritage Management Plan with the ESMP before the start of the works, then implement these measures throughout the Project implementation.	PMU
8.2	CHANCE FINDS  Describe and implement the "chance finds" procedures as mentioned in the ESMF. Likewise, any ESIA/ESMP to be prepared shall include such a section on cultural heritage.	Same timeline as for the adoption and implementation of the ESMF and the site-specific ESIA/ESMP, thereafter implementation of procedures throughout Project implementation.	PMU
ESS 10	: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION  Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation.	The SEP has been revised to reflect changes through restructuring and the additional financing. It has been disclosed, consulted, and adopted on 24 April, 2024. Thereafter, SEP shall be implemented throughout Project implementation.	PMU

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
10.2	Establish, disclose, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.  The GM is equipped to receive, register complaints about SEA / SH and facilitate their resolution, by referring survivors to competent service providers in the field of gender-based violence, all in a safe, confidential, and results-oriented manner.  The GM shall be supported by a communication plan so that the local populations affected by the Project are informed of the existence of this mechanism and know	The GM is established, active and shall be maintained and operated throughout Project implementation.	PMU
2121	the procedures for filing and handling complaints and other remedies		
RC1	Trainings shall be organized for the PMU staff, the strategic partners, the executives of the APRM structures, the stakeholders, the members of the affected communities, the Project workers, etc. on the following topics:  TRAINING ON ENVIRONMENTAL AND SOCIAL STANDARDS	Three (3) months after the start of the Project activities and once a year for the first three (3) years of the Project.	PMU
	<ul> <li>ESS1: Assessment and management of environmental and social risks and impacts;</li> <li>ESS 2: Labor and working conditions;</li> <li>ESS 3: Resource efficiency and Pollution Prevention and Management;</li> <li>ESS 4: Community health and safety;</li> <li>ESS 5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement;</li> <li>ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</li> </ul>		

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	<ul> <li>ESS 8: Cultural heritage;</li> <li>ESS 10: Stakeholder engagement and information disclosure.</li> <li>The training shall target:         <ul> <li>NGOs working in the agricultural, environmental, and social fields in the Project areas;</li> <li>Technical structures</li> <li>Local authorities;</li> <li>professional agricultural organizations (OPA)</li> </ul> </li> </ul>		
RC2	Organize the training of project workers and strategic partners, farmers and farm cooperative in occupational health and safety, including the prevention of emergency situations and modalities of preparation and response to emergency situations.  OCCUPATIONAL HEALTH AND SAFETY TRAINING:	Prior to the start of employment of newly recruited workers and those already working, training will be provided quarterly to ensure training of all staff.	PMU
	<ul> <li>Contractors and supervisory entities shall train all workers involved in project activities, including security personnel, on occupational health and safety, first aid equipment, prevention of emergency situations, preparation, and intervention (how to prepare and react to such situations);</li> <li>PMU in close collaboration with ATDA and farm cooperatives shall organize training for Beneficiaries of subsidized fertilizers, on good agrienvironmental and safety practices for the storage and rational use of fertilizers.</li> <li>Risk management in the workplace;</li> <li>Waste management;</li> <li>Grievance Management (GM).</li> </ul>	Throughout Project implementation.	

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	Contractors shall also ensure that their subcontractors' workers are trained on the same subjects. The training shall target:  - Contractors;		
	<ul> <li>Contractor's workers (including subcontractors);</li> <li>Control offices;</li> <li>PMU and implementation agencies</li> </ul>		
	Information, Education and Communication (IEC)		
	Sensitize the contractors' workers, including subcontractors' workers and the supervising entity mobilized on the construction sites, to environmental and social standards as well as inappropriate behaviors related to SEA / SH		
RC3	TRAINING ON WORK AND WORKING CONDITIONS	Prior to the start of employment of newly	PMU
	<ul> <li>Conditions of employment under national labor la;</li> <li>Code of conduct for contractors and subcontractors;</li> <li>workers' organizations;</li> <li>Rules on child labor and the minimum age for admission to employment;</li> <li>Workers' rights;</li> <li>Discrimination and Harassment / SEA / SH.</li> </ul>	recruited workers and those already working, training shall be provided quarterly to ensure training of all staff.	
	The training is aimed at the following actors:		
	<ul> <li>Project partners' workers</li> <li>Contractor's workers (including subcontractors)</li> <li>Supervising Engineer;</li> <li>NGOs working in the social field in the Project area.</li> </ul>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
RC4	<ul> <li>ENVIRONMENTAL AND SOCIAL MANAGEMENT TRAINING:</li> <li>This training shall provide knowledge about:         <ul> <li>The process of environmental and social selection and classification of subprojects;</li> <li>The procedures for organizing and implementing the ESIA and the Resettlement Action Plan (RAP);</li> <li>Environmental policies, procedures, and legislation in the Republic of Benin;</li> <li>ESMP and RAP implementation monitoring process</li> </ul> </li> <li>The training is aimed at the following actors:         <ul> <li>PMU (Backup Specialists);</li> <li>PMU and implementation agencies</li> </ul> </li> </ul>	Prior to the start of employment of newly recruited workers and those already working, training shall be provided annually to ensure training of all staff.	PMU
RC5	<ul> <li>Central and local technical structures involved in the Project.</li> <li>TRAINING ON THE GRIEVANCE MECHANISM:</li> <li>The training shall focus on the following modules:         <ul> <li>Registration and processing procedure;</li> <li>Complaint resolution procedure;</li> <li>Documentation and handling of complaints;</li> <li>Use of the procedure by the different actors;</li> </ul> </li> <li>The training is aimed at the following actors:         <ul> <li>National, departmental, and communal complaint management committees;</li> <li>Central and local technical structures involved in the Project (ATDA and DDAEP)</li> <li>Local authorities;</li> </ul> </li> </ul>	Prior to the start of employment of newly recruited workers and those already working, training will be provided quarterly to ensure training of all staff.	PMU

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	- NGOs and OPA		
RC6	<ul> <li>SEA / SH RISK TRAINING:</li> <li>Awareness and measures to prevent and mitigate the risks of EAS/HS;</li> <li>The themes, activities and target audiences shall be defined in the updated SEA/SH action plan;</li> <li>Dissemination of the updated SEA/SA action plan (activities, target groups);</li> <li>Handling of SEA/SH complaints</li> <li>The training is aimed at the following actors:</li> <li>Implementation agencies</li> <li>Central and local technical structures involved in the Project (DPV, ATDA and DDAEP)</li> <li>Local authorities;</li> </ul>	Before the start of employment of newly recruited workers and those who are already working, training will be provided quarterly to ensure training of all relevant staff, actors, and stakeholders.	PMU
RC7	<ul> <li>NGOs and OPA</li> <li>TRAINING ON RISKS AND MANAGEMENT DURING WORKS TARGETING WORKERS:</li> <li>SEA/SH, child labor and forced labor;</li> <li>GRM including the SEA/SH related grievance mechanism</li> <li>Compliance with the code of conduct clearly mentioning the prohibition of SEA/SH and the penalties in case of misconduct, etc.;</li> <li>Pollution and damage during work;</li> <li>Occupational Health and Safety.</li> </ul>	Before the start of work and organize regular refresher sessions	PMU
RC8	INFORMATION/AWARENESS-RAISING ON POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS TARGETING LOCAL POPULATIONS/COMMUNITIES:	Before the start of the works and throughout Project implementation.	PMU

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
Information/awareness-raising on potential environmental and social risks,		
including on SEA/SH in the Project, in order to encourage their commitment and		
involvement in the identification of measures that will help minimizing and		
mitigating adverse environmental and social risks and impacts related to Project		
implementation.		