

Republic of Benin

**BENIN COVID₁₉ PREPAREDNESS AND
RESPONSE PROJECT**

**ENVIRONMENTAL and SOCIAL
COMMITMENT PLAN (ESCP)**

December 23, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Benin (hereinafter the **Recipient**) shall implement the Benin - COVID-19 Preparedness and Response Project-P173839 (the **Project**). The International Development Association (hereinafter the **Association**) has agreed to provide financing for the Project. The multisectoral steering committee of the Global Health Security Agenda, chaired by the Head of the National Council to Combat HIV/AIDS, Tuberculosis, Malaria, Hepatitis and Epidemics (CNLS-TP) shall oversee annual project planning, monitor project progress, and approve annual reports. This committee includes the Ministry of Health (MOH), the Ministry of Agriculture and Livestock, the Ministry of living conditions and sustainable development (MLCESD), one representative of the National Association of Municipalities of Benin, and two representatives of civil society. The project coordination unit (PCU) of REDISSE shall be responsible for day-to-day project implementation.
2. The Recipient shall implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The Recipient is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
4. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by the Recipient as required by the ESCP and the conditions of the legal agreement, and the Association shall monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
5. As agreed by the Association and the Recipient, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Recipient shall agree to the changes with the Association and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Association and the Recipient. The Recipient shall promptly disclose the updated ESCP.
6. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	REGULAR REPORTING: Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to, stakeholder engagement activities and grievances log.	Quarterly during the Project's implementation in conjunction with the Project's progress reports.	CNLS-TP through the REDISSE-Phase III Project Coordination Unit
B	NOTIFICATION OF INCIDENTS AND ACCIDENTS: Immediately report any incident or accident directly or indirectly related to the implementation of the project. These incidents or accidents may include pollution of soils, rivers and bodies of water, poisoning by chemicals, incidents or accidents on project sites or in treatment rooms, influx of patients, cases of discrimination based on sex such as exclusion of vulnerable people (women, young people, people with disabilities, minority groups), cases of GBV and SEA/SH as well as complaints management. Whatever the case, the PCU will provide sufficient details of the incident or accident, indicating the measures taken without delay to deal with it and including the information made available by all personnel, supplier or service provider departments and by the oversight entity, if applicable.	Without delay after learning of the incident or accident. A report will be provided within a time frame acceptable to the Association.	CNLS-TP through the REDISSE-Phase III Project Coordination Unit
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.1 ORGANIZATIONAL STRUCTURE: The CNLS-TP shall oversee annual project planning, monitor project progress, and approve annual reports. The existing institutional and implementation arrangements that is used by the REDISSE-Phase III project shall be maintained for this COVID-19 Project. Therefore, the project coordination unit (PCU) of REDISSE (Regional Disease Surveillance Systems Enhancement-Phase III in Benin - P161163) shall be responsible for the day-to-day Project implementation. The existing PCU, which is under the aegis of the CNLS-TP, is headed by a Project Coordinator and staffed with qualified environmental and social safeguard specialists. A deputy coordinator shall be hired during project implementation to assist the coordinator in ensuring a strong alignment with REDISSE-Phase III project and in implementing the project in a cost-effective manner.</p>	<p>The Project shall be implemented by the existing REDISSE-Phase III PCU. That PCU already includes an environmental specialist and a social specialist who shall be retained throughout Project implementation. Given the level of risk of sexual exploitation and abuse / sexual harassment, deemed to be substantial, the project will ensure the following:</p> <ul style="list-style-type: none"> • training of the PIU on core concepts of GBV/SEA/SH and mitigation measures outlined in the Good Practice Note, • signature of Codes of Conduct for PIU staff only (not health providers), plan to regularly brief all health personnel on standards of conduct, and dissemination of messages that clearly prohibit SEA/SH during the provision of health care, • health service providers have information on where GBV psychosocial support and emergency medical services can be accessed, • based on consultations with women and girls on safe and accessible uptake points, establish community feedback mechanisms on overall service provision that is also able to safely and ethically handle SEA/SH., and • monitoring of the implementation status of SEA/SH risk mitigation measures included in the parent project. 	<p>CNLS-TP through the REDISSE-Phase III Project Coordination Unit</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</p> <p>a. Assess the environmental and social risks and impacts of proposed Project activities, including SEA/SH risks, in accordance with the REDISSE III Environmental and Social Management Framework (ESMF) to be updated, disclosed and adopted for the Project, including to ensure that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, have access to the development benefits resulting from the Project.</p> <p>b. Prepare, disclose, adopt, and implement any environmental and social management plans or other instruments required for the respective Project activities based on the assessment process, in accordance with the ESSs, the ESMF, the EHSs, the Infection Prevention and Control and Waste Management Plan and other relevant Good International Industry Practice (GIIP) including relevant WHO guidelines on COVID19 in accordance with the requirements of the ESSs and in a manner acceptable to the Association.</p> <p>c. Incorporate the relevant aspects of this ESCP, including, inter alia, any environmental and social management plans or other instruments, ESS2 requirements, and any other required ESHS measures, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply with the ESHS specifications of their respective contracts.</p> <p>d. Update environmental and social management framework includes measures to identify risks and potential environmental and social impacts and outline appropriate mitigation measures based largely on adopting WHO guidance, World Bank EHS Guidelines and other good international industry practices (GIIP), in accordance with the requirements of the ESSs and in a manner acceptable to the Association.</p> <p>e. The project shall continue to promote the avoidance of SEA/SH by relying on the WHO Code of Ethics and Professional Conduct for all workers in the quarantine facilities as well as the provision of gender-sensitive infrastructure such as segregated toilets and adequate lighting in quarantine and isolation centers.</p> <p>f. The project shall implement the action plans of the environmental and social audits.</p>	<p>a. ESMF is updated disclosed both in the country and in the Association web site. Assessment to be conducted before the carrying out of the relevant Project activities.</p> <p>b. Before the carrying out of the relevant Project activities, and thereafter throughout the carrying out of such activities.</p> <p>c. Before launching the procurement process for the relevant Project activities, and thereafter throughout the carrying out of such activities.</p> <p>d. Throughout Project implementation.</p> <p>e. Throughout Project implementation.</p> <p>f. Throughout Project implementation.</p>	<p>The CNLS-TP through the REDISSE-Phase III Project Coordination Unit</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.3 EXCLUSIONS: Exclude the following types of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> • Activities that may cause long term, permanent and/or irreversible (e.g. loss of major natural habitat) adverse impacts • Activities that have high probability of causing serious adverse effects to human health and/or the environment not related to treatment of COVID19 cases • Activities that may have significant adverse social impacts and may give rise to significant social conflict or social exclusion for category of person or groups of persons • Activities that may affect lands or rights of people or group of people including vulnerable groups (persons with disabilities, ethnic minorities, internally displaced persons, etc.), that may involve economic or physical displacement through land acquisition or adverse impacts on cultural heritage • All the other excluded activities set out in the ESMF of the Project. 	<p>These exclusions shall be applied as part of the assessment process conducted under action 1.2.a. above.</p>	<p>The CNLS-TP through the REDISSE-Phase III Project Coordination Unit</p>
<p>1.4 Provide medical and emergency services and supplies based on the urgency of the need, in line with the latest data related to the prevalence of the cases.</p>	<p>Throughout Project implementation.</p>	<p>The CNLS-TP through the REDISSE-Phase III Project Coordination Unit</p>
<p>ESS 2: LABOR AND WORKING CONDITIONS</p>		
<p>2.1 LABOR MANAGEMENT: The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association, including through, inter alia, Labor Management Procedures (LMP) in the ESMF, implementing adequate occupational health and safety measures (including emergency preparedness and response measures), setting out grievance arrangements for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</p> <p>The LMP developed by the Government of Benin during the implementation phase that included a grievance mechanism will be executed in a manner acceptable to the Association.</p>	<p>Developed after the effective date and shall be implemented throughout the project life cycle</p>	<p>The CNLS-TP through the REDISSE-Phase III Project Coordination Unit</p>
<p>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p>		
<p>Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, measures to manage health care wastes and other types of hazardous and non-hazardous wastes.</p>		
<p>ESS 4: COMMUNITY HEALTH AND SAFETY</p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above including, inter alia, measures to: minimize the potential for community exposure to communicable diseases; ensure that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, have access to the development benefits resulting from the Project; where relevant, manage the risks of the use of security personnel; manage the risks of labor influx; and prevent and respond to sexual exploitation and abuse, and sexual harassment.		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	Not Relevant		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	Not Relevant		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Not Relevant		
ESS 8: CULTURAL HERITAGE			
	Relevant aspects of this standard shall be considered, as needed (such as for “chance finds”), under action 1.2 above.		
ESS 9: FINANCIAL INTERMEDIARIES			
	Not relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN: Update, disclose and implement the Preliminary Stakeholder Engagement Plan (SEP) consistent with ESS10, in a manner acceptable to the Association.	A Preliminary SEP has been prepared and disclosed. This preliminary SEP is updated, disclosed both in the country and on the Association web site. The SEP shall be implemented throughout Project implementation.	The CNLS-TP through the REDISSE-Phase III Project Coordination Unit
10.2	STAKEHOLDER ENGAGEMENT INFORMATION AND DISCLOSURE: Preparation of a detailed communication and awareness plan that is adapted to ensure that vulnerable and disadvantaged groups are adequately consulted and receive accessible information regarding the project. The preparation and the implementation of this plan will be financed under Component 1.	The detailed communication and awareness plan will be prepared, consulted and disclosed no later than 30 days after the Effective Date. It will be updated as needed during Project implementation. The PCU will also engage from the MOH a communications specialist in the field of public health awareness and communication to assist the project team during project implementation.	The CNLS-TP through the REDISSE-Phase III Project Coordination Unit
10.2	GRIEVANCE MECHANISM: Accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, including SEA/SH complaints, consistent with ESS10, in a manner acceptable to the Association.	Throughout Project implementation.	The CNLS-TP through the REDISSE-Phase III Coordination Unit
CAPACITY SUPPORT (TRAINING)			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<ul style="list-style-type: none"> • Provide capacity support including training for PIU staff based on identified need to support the management of ESHS risks and impacts of the Project; • Provide training of health workers and other stakeholders such as surface technicians regarding E&S risks and waste management; • Provide training of complaint management committees; • Provide training to staff of health delivery facilities including other workers on the adequate use of personal protection equipment and on diagnosis, care and notification of positive COVID-19 cases; and • Provide training on other pertinent environmental and social issues, including identification and management of SEA/SH risks. 	<p>A comprehensive training plan will be prepared not later than 30 days after the Effective Date and included in the ESMF. It will be implemented immediately and throughout Project implementation.</p>	<p>The CNLS-TP through the REDISSE-Phase III Project Coordination Unit The recruitment of a specialized NGO may be necessary to provide these trainings.</p>