

**Government of Benin
Ministry of Health**

**BENIN COVID₁₉ PREPAREDNESS AND
RESPONSE PROJECT (P173839)**

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

March 30, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Benin (hereinafter the Recipient) will implement the Benin - COVID-19 Preparedness and Response Project-P173839 (the **Project**), with the involvement of the multisectoral steering committee of the Global Health Security Agenda, including the Ministry of Health (MOH), Ministry of Agriculture and Livestock, the Ministry of living conditions and sustainable development, one representative of the National Association of Municipalities of Benin, 2 representatives of Civil society, the National Council to Combat HIV/AIDS, Tuberculosis, Malaria, Hepatitis and Epidemics (CNLS-TP) and REDISSE (Regional Disease Surveillance Systems Enhancement-Phase III in Benin - P161163). The International Development Association (*hereinafter the Association*) has agreed to provide financing for the Benin - COVID-19 Preparedness and Response Project-P173839.
2. The Recipient will 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 will 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 will 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 will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the Recipient. The Recipient will 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.	Ministry of Health through the REDISSE-Phase III Project Coordination Unit
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE: The existing institutional and implementation arrangements that is used by the REDISSE-Phase III project will be maintained for this COVID-19 project. Therefore, (i) the multisectoral steering committee of the Global Health Security Agenda, including the Ministry of Health (MOH), Ministry of Agriculture and Livestock, the Ministry of Living Conditions and Sustainable Development, one representative of the National Association of Municipalities of Benin, 2 representatives of civil society chaired by the Head of the National Council to Combat HIV/AIDS, Tuberculosis, Malaria, Hepatitis and Epidemics (CNLS-TP), assisted by a technical committee that will oversee annual project planning, monitor project progress, and approve annual reports; (ii) the project coordination unit (PCU) of REDISSE (Regional Disease Surveillance Systems Enhancement-Phase III in Benin - P161163) will 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 procurement, financial, M&E, and environmental and social safeguard specialists. Additional staff will be hired during project implementation (i.e , a deputy coordinator and a communications specialist) to assist the coordinator in ensuring a strong alignment with REDISSE-Phase III project and in implementing the project in a cost-effective manner.	The new operation will be implemented by REDISSE-Phase III team. That PCU already includes an environmental specialist and a social specialist that will be maintained throughout the Project implementation. They will support the E&S risk assessment and preparation of E&S risk management instruments during the project preparation process and will oversee the E&S risks management of the project during the project implementation. The project will also hire a deputy coordinator and communications specialist during project implementation.	Ministry of Health and REDISSE-Phase III Project Coordination Unit (Coordinator and E&S Specialists)

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</p> <p>a. Prepare and disclose the project <i>Environmental and Social Management Framework (ESMF)</i></p> <p>b. Assess the environmental and social risks and impacts of proposed Project activities, in accordance with <i>Environmental and Social Management Framework (ESMF)</i>, prepared pursuant to the provisions of the [Financing/Loan/Grant] Agreement], 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>c. 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 ESHGs, and other relevant Good International Industry Practice (GIIP) including (<i>the WHO guidelines on COVID19</i>) in a manner acceptable to the Association.</p> <p>d. 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. Update environmental and social management plans or other instruments based on updated guidance by WHO on COVID19.</p> <p>e. Assess et set up mitigation measures to manage the project’s risk of Gender Based Violence (GBV) including Sexual Exploitation and Abuse Sexual Harassment</p>	<p>a. ESMF to be prepared (update of the REDISSE’s ESMF) no later than 30 days after project Effectiveness. 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. No later than 30 days after the project Effectiveness Date and maintained the implementation of mitigation measures throughout Project lifecycle</p>	<p>Ministry of Health and REDISSE-Phase III Project Coordination Unit (Coordinator and E&S Specialists)</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	<p>EXCLUSIONS: Exclude the following type 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) impacts Activities that have high probability of causing serious adverse effects to human health and/or the environment other than during 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 (disabilities, ethnic minorities, internally displacement persons, etc.), that may involve economic or physical resettlement through land acquisition or impacts on cultural heritage All the other excluded activities set out in the ESMF of the Project. 	These exclusions shall be applied as part of the screening process conducted under action 1.2.a. above.	Ministry of Health - REDISSE-Phase III Project Coordination Unit (Coordinator and E&S Specialists)
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.	Throughout the project life of cycle	Ministry of Health and REDISSE-Phase III Project Coordination Unit (Coordinator and E&S Specialists)
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>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, 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>	Throughout Project implementation.	Ministry of Health and REDISSE-Phase III Project Coordination Unit (Coordinator and E&S Specialists)
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
	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.		
ESS 4: COMMUNITY HEALTH AND SAFETY			
	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; 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			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
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, 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 shall be updated no later than 30 days following the project's Effectiveness Date. The SEP shall be implemented throughout Project implementation.	Ministry of Health and REDISSE-Phase III Project Coordination Unit (Coordinator, E&S Specialists and Communication Specialist)
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 Project effectiveness. It will be updated as needed during Project implementation.	Ministry of Health and REDISSE-Phase III Project Coordination Unit (Coordinator, E&S Specialists and Communication Specialist)
10.3 GRIEVANCE MECHANISM: Accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Association.	Throughout Project implementation.	Ministry of Health and REDISSE-Phase III Coordination Unit (Coordinator and E&S Specialists)
CAPACITY SUPPORT (TRAINING)		
Provide capacity support including training for PIU staff based on identified need to support the management of ESHS risks and impacts of the Project Training of health workers and other stakeholders such as surface technicians regarding E&S risks and waste management 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.	A comprehensive training plan will be prepared no later than 30 days after project Effectiveness. It will be implemented immediately and throughout Project implementation.	Ministry of Health in coordination with the Association. REDISSE-Phase III Project Coordination Unit (Coordinator E&S Specialists and Communication Specialist) The recruitment of a specialized NGO may be necessary to provide these trainings.