



REPUBLIC OF BENIN

**Société des Infrastructures Routières et de
l'Aménagement du Territoire (SIRAT SA)**

**Grand Nokoué Sustainable Urban Mobility
Project (GN-SUMP) (P180579)**

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

[Negotiated Version]

03/31/2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Benin (the Recipient) will implement the Grand Nokoué Sustainable Urban Mobility Project (the Project), with the involvement of the Société des Infrastructures Routières et de l'Aménagement du Territoire (SIRAT), as set out in the Financing Agreement and the Project Agreement (the Agreements). The International Development Association (the Association) has agreed to provide the financing for the Project, as set out in Agreements.
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. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreements.
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, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreements, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Representative specified in the Agreements. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	ORGANIZATIONAL STRUCTURE a. Establish and maintain within the SIRAT a PIU with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project including an environmental specialist with strong background in health and safety and a social and gender specialist who will also handle stakeholder engagement and SEA/SH, all with qualifications and terms of reference acceptable to the Association.	a. Establish the PIU no later than one (1) month after the Effective Date and thereafter maintain the PIU and staffing positions throughout Project implementation. b. Finalize and start implementing the collaboration arrangements prior to the start of project activities.	SIRAT
B	CAPACITY BUILDING PLAN/MEASURES Prepare and implement the capacity building plan including the following capacity building measures: Training of PIU staff, stakeholders, affected community members, project workers and consultants on, but not limited to, the following subjects: <ul style="list-style-type: none"> • Project Management (scope, implementation, monitoring and reporting) • World Bank Environmental and Social Framework (including the Environmental, Social Standards (ESSs)) • Grievance Redress Mechanism • Community health and safety • Occupational Health and Safety • Environmental and Social Monitoring and Reporting • GBV/SEA risk management and child rights protection • Gender and Disability inclusion • Information on World Bank's Safeguards Incidents Reporting Tool (ESIRT) provided. 	The capacity building plan shall be prepared, approved before the end of each year and implemented annually throughout Project implementation.	PIU
MONITORING AND REPORTING			
C	REGULAR REPORTING Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include: <ul style="list-style-type: none"> • Status of preparation and implementation of E&S documents required under the ESCP. 	Submit quarterly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the World Bank no later than 15 days after the end of each reporting period.	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. Number and status of resolution of incidents and accidents reported under action E below. Monitoring of environmental and social indicators, labor management, taking into account vulnerable people. 		
D	CONTRACTORS' MONTHLY REPORTS Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.	Submit these monthly reports to the Association as annexes to the reports to be submitted under action C above.	PIU
E	INCIDENTS AND ACCIDENTS Notify the Association of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request. Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.	Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request. Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.	PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS		PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>1. Implement the Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) of the improvement of access routes and traves of Cotonou (ATC) Lot 1 under Component 3.2 of the Project , the final version of which, consistent with the relevant ESSs, was disclosed on March 30, 2025.</p> <p>2. Prepare, disclose, consult, adopt and implement Environmental and Social Assessments (ESAs), and corresponding Environmental and Social Management Plans (ESMPs) for sub-projects under Components 2, 3 and 4 of the Project respectively, consistent with the relevant ESSs.</p> <p>3. Implement the Environmental and Social Management Framework (ESMF) for the Project, which was prepared, adopted and disclosed on January 20, 2025, consistent with the relevant ESSs.</p> <p>4. Prepare, disclose, consult, adopt and implement the Strategic Environmental and Social Assessment (SESA) to accompany the urban mobility strategy under Part 1, consistent with ESSs.</p> <p>5. Assess the implementation of contractors ESMPs (C-ESMPs), consistent with ESSs.</p>	<p>1. Implement the ESMP, disclosed on March 30, 2025, throughout Project implementation.</p> <p>2. Prepare the relevant ESA and ESMP prior to the start of the relevant works, and thereafter implement the ESA and ESMP throughout Project implementation.</p> <p>3. Implement the ESMF throughout Project implementation.</p> <p>4. No later than two (02) years after the Effective Date and thereafter implement throughout Project implementation.</p> <p>5. Assess the implementation of the C-ESMPs periodically from the commencement of the civil works and throughout Project implementation.</p>	
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the ESIA and corresponding ESMPs, the Waste Management Plan (WMP), the Occupational Health and Safety (OHS) Management Plan, the Labor Management Procedures, and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Provide copies of relevant contracts to the Association upon request.</p>	PIU
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Carry out the consultancies, feasibility studies, capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the</p>	<p>Throughout Project implementation.</p>	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Association, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.		
1.5	<p>ASSOCIATED FACILITIES</p> <p>1. Ensure that the Strategic Environmental and Social Assessment (SESA), disclosed on November 18, 2024, and the standalone preliminary ESIA as addendum to the ESMF, agreed with the Association and disclosed on January 14, 2025, are both implemented in accordance with ESSs.</p> <p>2. Enter collaboration arrangements with ADELAC to manage E&S risks and impacts of the activities of the lake transport.</p> <p>3. Ensure that the dredging of the Lake Nokoue is carried out in accordance with the applicable requirements of this ESCP and the ESSs, including, inter alia, the Lake Transport Safety Plan including emergency response measures in case of boats capsizing and sinking.</p>	<p>1. Throughout Project implementation.</p> <p>2. Finalize and start implementing the collaboration arrangements prior to the start of lake transport activities.</p> <p>3. Throughout Project implementation.</p>	PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Implement the Labor Management Procedures (LMP) for the Project, which was prepared, adopted and disclosed on February 12, 2025, consistent with ESS2.</p>	Implement the LMP throughout Project implementation.	PIU Project contractors and subcontractors
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</p> <p>Require contractors and subcontractors to prepare and implement OHS Management Measures or Plan in accordance with ESMF, ESIAs and the World Bank Group Environmental, Safety and Health Guidelines.</p>	Prepare the OHS Management Plan prior to the commencement of civil works, and thereafter implement the plan throughout Project implementation.	PIU Project contractors and subcontractors
2.3	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Prepare and implement a Waste Management Plan (WMP), as part of the ESMPs to be prepared under action 1.1 above to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	Same timeframe as for the preparation and implementation of the ESMPs.	PIU Project contractors and subcontractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMPs to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the ESMPs.	PIU Project contractors and subcontractors
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY a. Incorporate measures to manage traffic and road safety risks as required in the ESMPs to be prepared under action 1.1 above. b. Implement the Road Safety Plan (RSP) of the ATC 1 under Component 3.2 of the Project, disclosed on March 20, 2024.	a. Same timeframe as for the preparation and implementation of the ESMP. b. Implement the RSP throughout Project implementation..	PIU
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, risks of labor influx, response to emergency situations, and any requisite SEA/SH measures and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.	Same timeframe as for the preparation and implementation of the ESMPs.	PIU
4.4	SECURITY MANAGEMENT Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities as set out in the ESMF.	Prior to engaging security personnel, and thereafter throughout the Project implementation.	PIU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
5.1	<p>RESETTLEMENT FRAMEWORK and PLANS</p> <p>1. Implement the Resettlement Policy Framework (RPF) for the Project, which was prepared, adopted and disclosed on January 24, 2025, consistent with ESS5.</p> <p>2. Prepare, disclose, consult, adopt and implement a Resettlement Plan (RP) for each activity as set out in the RPF and consistent with ESS5. An escrow account will be opened to ensure the availability of funds.</p> <p>3. Implement the RAP of ATC 1 under Component 3.2 of the Project, which was prepared, adopted, and disclosed on March 21, 2025.</p>	<p>1. Implement the RPF throughout Project implementation.</p> <p>2. Prepare, disclose, consult, adopt and implement the respective RP prior to carrying out the relevant works, including ensuring that before taking possession of the land and related assets, full compensation has is either paid or secured, to the satisfaction of the Association, nd as applicable displaced people have been resettled and moving allowances have been provided.</p> <p>3. Implement the RAP prior to carrying out the relevant work on the ATC 1 under Component 3.2 of the Project.</p>	PIU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>1. Incorporate measures consistent with ESS6 to manage biodiversity risks and impacts as required in the ESMPs to be prepared under action 1.1 above.</p> <p>2. Enter collaboration arrangements with Agence Beninoise de l'Environnement (ABE) to support the management E&S risks and impacts of the Project on the Ramsar site 1018, consistent with ESS6.</p> <p>3. To address biodiversity risks and impacts associated with activities under Component 3, implement the biodiversity measures incorporated in the ESAs to be prepared under action 1.1 above in accordance with ESS6.</p>	<p>1. Same timeframe as for the preparation and implementation of the ESMP.</p> <p>2. Finalize and start implementing the collaboration arrangements no later than twelve (12) months after the Effective Date,</p> <p>3. Throughout Project implementation</p>	PIU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES Not applicable			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p>	Throughout Project implementation	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Screen Project sites in accordance with ESS8 to avoid impacts on cultural heritage sites where possible.</p> <p>Prepare and implement a Cultural Heritage Management Plan (CHMP) as part of the ESMP, in accordance with the guidelines of the ESMF prepared for the Project, and consistent with ESS8.</p>	Prepare the CHMP as part of the ESMP prior to commencement of any activities that would have significant impact on cultural heritage, and thereafter implement the CHMP throughout Project implementation.	
8.2	<p>CHANCE FINDS</p> <p>Apply the chance finds procedures described in the ESMF in the case of any encounter with cultural heritage during the works.</p>	Implement the procedures throughout Project implementation	PIU
ESS 9: FINANCIAL INTERMEDIARIES Not applicable			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>Update, disclose, adopt and implement the Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, that has been disclosed on January 30, 2025 and which 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.</p>	Update the SEP prior to the start of the civil works or the lake transport, and thereafter implement the SEP throughout Project implementation.	PIU
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, 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.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p> <p>While the operationalization of the Project GM is pending, register any Project-related complaints through the GRM of the Benin Building Resilient and Inclusive Cities Program (P176653) and of the Cotonou Rainwater Sanitation Program - PAPC (P167359) under SIRAT coordination.</p>	Establish the grievance mechanism no later than 3 months after Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation.	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
INDICATORS FOR IMPLEMENTATION READINESS			
<p>The following actions are indicators for implementation readiness:</p> <ul style="list-style-type: none"> i) Establishment of PIU in SIRAT and frequent reporting on the E&S performance of the project; ii) E&S Training of staff within Specialized Implementing Agencies, such as MCVT's DGDU, ADELAC and DAPMF, ANaTT, CNSR, MEF's USMEF, , etc. ; iii) Implementation of agreements/conventions between SIRAT and ABE; iv) Memorandums of Understanding or other written agreements/arrangements between SIRAT and other technical agencies to ensure proper coordination of E&S risk management activities; v) E&S effectiveness or disbursement conditions, if deemed warranted; vi) E&S assessments and plans to be prepared by the Recipient at the onset of implementation of any activity; vii) other project-specific requirements related to E&S readiness for implementation. 			