



MINISTÈRE DU CADRE DE VIE  
ET DU DÉVELOPPEMENT DURABLE  
RÉPUBLIQUE DU BÉNIN

Integrated Project Management Unit  
/Project Implementing Unit (PIU)

Benin Gazetted Forests Management Project 2

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# Benin Gazetted Forests Management Project 2 (P508182)

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

**02/18/2025**

**DRAFT**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of the Republic of Benin (the [Borrower/Recipient]) will implement the Benin Gazetted Forests Management Project 2 (the Project), through the Project Implementing Unit (PIU) which is implementing the Benin Gazetted Forests Management (GFM) Project currently being implemented, under the supervision of the Ministry of Living Environment and Transport in charge of Sustainable Development, as indicated in the Original Loan Agreement (the Agreement). The International Development Association (the Association) acting as administrator, has agreed to provide the [original] financing for the Project, as indicated in the [Agreement].
2. The Government of the Republic of Benin shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESS) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation the foregoing, this ESCP sets out the material measures and actions that the Government of the Republic of Benin shall implement 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. Such E&S documents may be revised from time to time with the prior written consent of the Association. As provided for under the referred Agreement, the Government of the Republic of Benin shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed between the Association and the Government of the Republic of Benin, this ESCP will be revised from time to time, as necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Government of the Republic of Benin agree to update the ESCP to reflect such changes through an exchange of letters signed between the Association and the representative of the Government of the Republic of Benin specified in the Agreement or to the Ministry of Living Environment and Transport responsible for Sustainable Development. The Government of the Republic of Benin shall promptly disclose the 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.

CONCRETE MEASURES AND ACTIONS		CALENDAR	RESPONSIBLE ENTITY
<b>IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT<sup>1</sup></b>			
HAS	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Maintain the necessary staff of the current Project Implementing Unit (PIU) financed by the World Bank to provide adequate support in identifying and managing the environmental, social, health and safety (E&amp;S) risks and impacts of the project until the effective recruitment of the GFM Project 2 E&amp;S specialists.</p> <p>Recruit during the project implementation phase (i) an environmental specialist and (ii) a social specialist with, among other things, skills in GBV risk and impact management for the implementation of the project's E&amp;S risk management measures.</p>	<p>Within three (3) months after the Project comes into force and maintain throughout the life cycle of the Project.</p>	PIU
B	<p><b>CAPACITY BUILDING PLAN/MEASURES</b></p> <p>Conduct an assessment of law enforcement functions by relevant institutions (institutional assessment), including procedures, rules, staff arrangements, codes of conduct and existing relationships with communities living in or near gazetted forests, against good practices and international standards acceptable to the Bank.</p> <p>Prepare and implement capacity building measures for PIU staff, the General Directorate of Water, Forests and Hunting (DGEFC), the Technical Forest Management Units (CTAF), other stakeholders (communities, workers' groups, co-management structures) on (i) the risks of accidents/incidents related to forest management works and prevention and management measures, (ii) stakeholder mapping and engagement, (iii) specific aspects of environmental and social assessment, (iv) emergency preparedness and response, health and safety of workers, the community, (v) the complaint management mechanism, (vi) GBV/SEA-SH risks and management of allegations and complaints of sexual exploitation or abuse (SEA), or sexual harassment (SH); , (vii) biodiversity management, (viii), information collection and monthly reporting of E&amp;S measures planned for the project</p>	<p>Before the start of work and thereafter, implements measures throughout the implementation of the project.</p> <p>A training and capacity building plan will be developed for the entire duration of the project and implemented annually, with updates as necessary, throughout the project implementation cycle.</p>	PIU
<b>MONITORING AND REPORTING</b>			
C	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Association quarterly monitoring reports on the environmental, social, health and safety (E&amp;S) performance of the project. The</p>		PIU

<sup>1</sup>For all actions, consult with the country's attorney to ensure consistency with the legal agreement in cases where certain actions must be completed before the project becomes effective (effectiveness condition) or before certain disbursements can take place (disbursement condition).

CONCRETE MEASURES AND ACTIONS		CALENDAR	RESPONSIBLE ENTITY
	reports shall include, among others: (i) Progress on the preparation and implementation of the E&S documents required under the ESCP; (ii) Summary of stakeholder engagement activities carried out in accordance with the stakeholder engagement plan, (iii) Complaints submitted to the grievance mechanism, the grievance log and progress made in resolving them, (iv) E&S performance of contractors, co-management structures and subcontractors, reforestation groups as reported in the CTAF monthly reports, (v) Number and resolution status of incidents and accidents reported under Action E below, (vi) Update on biodiversity management, (vii) Summary of contractors' monthly reports and any other necessary elements/data to be shared.	Quarterly reports will be produced throughout the implementation of the Project and submitted to the Association no later than 15 days after the quarter has expired.	
D	<b>CONTRACTORS' MONTHLY REPORTS</b> In the context of works contracts, suppliers and service providers are required to provide monthly monitoring reports on the Environmental and Social performance of the works to the Project Implementing Unit (PIU). These reports will be forwarded to the Association by the PIU upon its request.	Monthly reports for contract work are provided throughout the term of the contract or subcontract.	- <b>PIU</b> - <b>CONTRACTORS</b>
E	<b>INCIDENTS AND ACCIDENTS</b>  Inform the Association of any incident or accident related to the project that has or is likely to have a significant adverse effect on the environment, affected communities, the public or workers, including those resulting in death or serious injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts on cultural heritage or biodiversity resources; environmental pollution; dam failure; forced or child labour; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA) or sexual harassment (SH); or epidemics. Provide available details of the incident or accident to the Association upon request.  Organize an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare and share with the Association and then implement a corrective action plan that sets out the measures and actions to be taken to remedy the incident or accident and prevent its recurrence.	Notify the Association no later than 48 hours after becoming aware of the incident or accident. The deadline is 24 hours for SEA-SH cases. Provide available details upon request.  A circumstantial incident report will be provided within a time frame acceptable to the Association. This reporting system will be observed throughout the Project	<b>PIU</b>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b>  1. Prepare, disclose, consult, adopt and implement in a manner acceptable to the Association, the environmental and social risk management instruments required within the framework of the project.	E&S risk management plans and other required instruments will be prepared, disclosed, adopted and subsequently implemented prior to the performance of relevant project activities throughout the project life cycle.	<b>PIU</b>

CONCRETE MEASURES AND ACTIONS		CALENDAR	RESPONSIBLE ENTITY
	<p>2. Prepare and implement an Environmental and Social Management Framework (ESMF) for the project and acceptable to the Association.</p> <p>3. Conduct screening to select sub-projects based on an assessment of the risks and environmental and social impacts of the proposed project activities, including the risks of sexual exploitation and abuse/sexual harassment (SEA/SH), social exclusion, particularly of vulnerable individuals and groups, in accordance with the project's environmental and social management framework (ESMF).</p>	<p>The ESMF will be developed and approved by the Association 3 months after the project financing comes into effect.</p> <p>Pre-screening is carried out for all planned actions and appropriate E&amp;S instruments are developed</p>	
1.2	<p><b>MANAGEMENT OF CONTRACTORS</b> The Beneficiary will ensure that the contracts and agreements impose on companies/contractors, subcontractors, control missions and any other service provider the obligation to comply with the management tools and instruments required by the Project.</p> <p>Comply with the minimum environmental and social clauses included in tender documents and works contracts, including the relevant contractor requirements of the GBV, SEA/SH/ and Violence against children action plan.</p>	<p>During the preparation of tender documents and before the signing of any service contract.</p> <p>Maintain procedures throughout the implementation of the Project.</p>	<ul style="list-style-type: none"> <li>- <b>PIU</b></li> <li>- <b>CONTRACTORS</b></li> </ul>
1.3	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that consultations, studies (including all studies necessary for the development and implementation of development plans, and feasibility studies, where appropriate), capacity building activities, training, and any other technical assistance activities under the Project (including work on institutional arrangements and private sector involvement) are carried out in accordance with terms of reference acceptable to the Association and consistent with the ESS. Subsequently, ensure that the products of these activities are consistent with the terms of reference.</p>	<p>Throughout the implementation of the project</p>	<ul style="list-style-type: none"> <li>- <b>PIU</b></li> </ul>
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Adopt and implement established Labor Management Procedures (LMP) for the Project, including, among others, 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 with respect to sexual exploitation and abuse and sexual harassment), forced labor, child labor, Project worker grievance mechanism, and requirements applicable to suppliers and service providers, subcontractors and the prime contractor.</p>	<p>Adopt labor management procedures (LMP) 03 months after the entry into force of the financing, then apply the procedures and measures contained in this plan throughout the implementation of the Project].</p>	<ul style="list-style-type: none"> <li>- <b>PIU</b></li> <li>- <b>Implementing Agencies / CTAF</b></li> <li>- <b>Contractors, subcontractors</b></li> <li>- <b>Consultants</b></li> </ul>

CONCRETE MEASURES AND ACTIONS		CALENDAR	RESPONSIBLE ENTITY
2.2	<p><b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</b></p> <p>Include in the contracts of service providers and suppliers' measures relating to occupational health and safety (OHS) and ensure that all suppliers/providers under the project develop and implement a plan relating to occupational health and safety at Work including provisions for the prevention of COVID 19 through a COVID 19 contingency plan. These occupational health and safety at work measures, including those related to SEA/SH, will be integrated into the Project Implementation Manual and any contract signed under the Project.</p>	During the preparation of project activities and before the signing of contracts and the start of civil engineering works and maintain throughout the period of execution and monitoring of the Project.	<ul style="list-style-type: none"> <li>- <b>PIU</b></li> <li>- <b>Contractors/</b></li> <li>- <b>Subcontractors</b></li> </ul>
2.3	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish and operate a grievance mechanism for project workers, as described in the LMP and consistent with ESS2.</p>	The grievance mechanism shall be established and operationalized no later than 3 months after the effective date of the project and implemented throughout the duration of the project.	<b>PIU</b>
<p><b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> [The relevance of ESS3 is established during the ESA process. ESS3 may require the preparation of specific measures to cover energy, water (e.g., water balance) and raw materials use, management of air pollution, hazardous and nonhazardous wastes, chemicals and hazardous materials and pesticides (pest management plan). Depending on the project, these measures may be set out in an E&amp;S document (e.g., ESMP) already mentioned in the section under ESS1 above or as a stand-alone document or as a separate measure or action.]</p>			
3.1	<p><b>WASTE MANAGEMENT PLAN</b></p> <p>Prepare and implement a Waste Management Plan (WMP), as part of the ESMP prepared for the project, to manage hazardous and non-hazardous waste, in accordance with ESS3.</p>	Prepare the waste management plan before the start of work, then implement the WMP throughout the implementation of the project.	<b>PIU</b>
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Integrate resource efficiency, pollution prevention and management measures into the ESMP to be developed for the relevant sub-projects</p>	Before the start of work and throughout the implementation of sub-projects.	<b>PIU</b>
<p><b>ESS 4: COMMUNITY HEALTH AND SAFETY</b> [The relevance of ESS4 is established during the ESA process. As with other ESSs, ESS4 may require the preparation of specific measures to cover community health and safety risks, including, inter alia, on infrastructure and equipment design and safety, safety of services, traffic and road safety, community exposure to health issues, ecosystem services, management and safety of hazardous materials, emergency preparedness and response, security (including engagement of security personnel), and safety of dams. Depending on the project, these measures may be set out in an E&amp;S document (e.g., ESMP) already mentioned in the section under ESS1 above or as a stand-alone document or as a separate measure or action.]</p>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>Integrate traffic and road safety risk management measures, as required by the ESMP to be developed for the relevant sub-projects</p>	Before the start of work and throughout the implementation of sub-projects.	<b>PIU</b>
4.2	<p><b>COMMUNITY HEALTH AND SAFETY</b></p>	Before the start of work and throughout the implementation of sub-projects.	<b>PIU</b>

CONCRETE MEASURES AND ACTIONS		CALENDAR	RESPONSIBLE ENTITY
	Assess and manage specific risks and impacts on the community arising from project activities, including, among others, the behaviour of project workers, risks of labor influx, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF and this ESMP.		
4.3	<b>RISKS OF SEXUAL EXPLOITATION AND ABUSE (SEA) and SEXUAL HARASSMENT (SH)</b> Prepare and implement an SEA/SH action plan within the framework of the ESMP, to assess and manage SEA and HS risks	Prepare the SEA/SH Action Plan before the project effective date and then implement the SEA/SH Action Plan throughout project implementation.	PIU
4.4	<b>SECURITY MANAGEMENT</b> Assess and implement measures to manage the security risks of the project, based on a Security Risk Assessment (SRA) and a Security Management Plan (SMP), based on the principles of proportionality and international good practices in the sector concerned as well as on the applicable law regarding recruitment, rules of conduct, training, equipment, and monitoring of this personnel.	Develop and adopt Security Risk Assessment (SRA) and a Security Management Plan (SMP) and then ensure its implementation throughout the implementation of the Project.	PIU
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b> [The relevance of ESS5 is established during the ESA process. If resettlement documents need to be prepared (e.g., resettlement process frameworks, resettlement action plans, process frameworks) this should be reflected in the ESCP.]			
5.1	<b>RESETTLEMENT FRAMEWORK AND PROCESS FRAMEWORK,</b> Prepare, adopt and implement a Resettlement Framework (RF) and a Process Framework (PF) in a manner satisfactory to the Association, in accordance with ESS5. The Process framework describes the participatory processes that will enable the following activities to be carried out: <ul style="list-style-type: none"> <li>a) Prepare and implement project components.</li> <li>b) Establish eligibility criteria for affected individuals.</li> <li>c) Identify measures to support efforts by affected people to improve their livelihoods, or restore them, in real terms, to pre-displacement levels, while preserving the sustainability of the gazetted forest.</li> <li>d) Resolve potential conflicts and grievances within or between affected communities.</li> </ul> In addition, the process framework should describe arrangements relating to the following points: <ul style="list-style-type: none"> <li>(e) Administrative and legal procedures, including reviewing agreements reached on the approach adopted with administrative authorities and supervisory ministries</li> </ul>	The process framework will be prepared before the project effective date and then applied throughout the project implementation.  The Resettlement framework will be prepared, adopted and published 03 months after the effective date of the project, then applied throughout the implementation of the project.	PIU

CONCRETE MEASURES AND ACTIONS		CALENDAR	RESPONSIBLE ENTITY
	(f) Monitoring arrangements. The document should review the arrangements for participatory monitoring of project activities regarding the effects (positive and negative) they produce on people located in the project impact area, and for monitoring the effectiveness of measures taken to improve (or at least restore) incomes, livelihoods and living standards.		
5.2	<b>RESETTLEMENT PLANS AND LIVELIHOOD RESTORATION PLANS</b>  Prepare, adopt and implement Resettlement Plans (RP) and/or Livelihood Restoration Plans (LRP), where required, as indicated in the Resettlement framework and process framework, and in accordance with ESS5.	The LRP and/or RP will be prepared, adopted and disclosed prior to the start of any project, activity requiring involuntary resettlement or access restriction and implemented throughout the duration of the project.	<b>PIU Implementing Agencies / CTAF</b>
5.3	<b>COMPLAINTS HANDLING MECHANISM</b>  The grievance mechanism to address complaints related to resettlement should be described in the Resettlement framework, resettlement plans and the SEP, including a specific mechanism for SEA/SH complaints. The grievance mechanism should be operational and accessible to all stakeholders affected by land acquisition, access restriction and involuntary resettlement activities.	Before the start of the implementation of resettlement plans and livelihood restoration plans, then throughout the implementation of the project	<b>PIU Implementing Agencies / CTAF NGO</b>
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES [The relevance of ESS6 is established during the ESA process. As with other ESSs, ESS6 may require the preparation of specific measures that may be set out in an E&amp;S document (e.g., ESMP) already mentioned in the section under ESS1 above or as a stand-alone document or a separate measure or action].</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b>  Prepare and implement a biodiversity management plan within the framework of the ESMP, in accordance with the ESIA guidelines prepared for the project, and consistent with ESS6.	Prepare the biodiversity management plan before implementing the activities planned by the project and then implement the biodiversity management plan throughout the implementation of the project.	<b>PIU</b>
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES NOT APPLICABLE</b>			
<b>ESS 8: CULTURAL HERITAGE [The relevance of ESS8 is established during the ESA process. As with other ESSs, ESS8 may require the preparation of specific measures that may be set out in an E&amp;S document (e.g., ESMP) already mentioned in the section under ESS1 above or as a stand-alone document or a separate measure or action.]</b>			
8.1	<b>CULTURAL HERITAGE RISKS AND IMPACTS</b>  Prepare and implement a Cultural Heritage Management Plan (CHMP) including measures for the protection of cultural heritage and chance discoveries in accordance with the provisions of Law No. 2021-09 on the protection of the cultural heritage of Benin within the framework of the ESMP, in accordance with the guidelines of the ESIA/ESMP prepared for the project, and consistent with ESS8.	Prepare a Cultural Heritage Management Plan (CHMP) before the actual implementation of the activities planned by the project, then implement the regulatory procedure in the event of an accidental discovery.	<b>PIU</b>
<b>ESS 9: FINANCIAL INTERMEDIARIES [This standard only applies to projects involving financial intermediaries (FIs).] NOT APPLICABLE</b>			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			



CONCRETE MEASURES AND ACTIONS		CALENDAR	RESPONSIBLE ENTITY
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN</b></p> <p>Develop and implement a Stakeholder Engagement Plan (SEP) for the project, consistent with ESS10, which must include measures to, among other things, provide stakeholders with timely, relevant, understandable and accessible information, and consult them in a culturally appropriate manner, free from manipulation, interference, coercion, discrimination and intimidation. The SEP must include measures to report to stakeholders on the consideration of their contributions and needs in decision-making.</p>	Establish the SEP prior to the project effective date and then implement the SEP, updating as necessary, throughout project implementation.	<b>PIU</b>
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></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>	Establish the grievance mechanism before the start of project implementation activities, and then maintain, update as necessary and operate the mechanism throughout project implementation.	<ul style="list-style-type: none"> <li>- <b>PUI</b></li> <li>- <b>Implementation Actors</b></li> </ul>
<p><b>INDICATORS FOR IMPLEMENTATION READINESS</b> [This subsection lists the ESCP actions (by their numbering in the first column of the ESCP) that are identified as relevant to monitor project readiness from an E&amp;S standpoint. These may include actions related to: i) establishment of E&amp;S risk management units in the Project Implementation Entities, ii) recruitment and training of E&amp;S staff within Project Implementation Entities, iii) Memorandums of Understanding or other written agreements/arrangements between Project Implementation Entities and other concerned agencies to ensure proper coordination of E&amp;S risk management activities; iv) E&amp;S effectiveness or disbursement conditions, if deemed warranted, v) ES assessments and plans to be prepared by the Borrower at the onset of implementation; vi) other project-specific requirements related to E&amp;S readiness for implementation].</p>			
<p>The following actions are indicators of readiness for implementation:</p> <p>(A) Establish and maintain the PIU with qualified personnel and adequate resources to ensure the management of environmental, social (E&amp;S), occupational health and safety (OHS) risks and impacts of the project.</p> <p>(B)</p> <ul style="list-style-type: none"> <li>• Carry out an assessment of the degree of application of laws by institutions involved in the management of gazetted forests (Institutional assessment)</li> <li>• Prepare and implement capacity building measures for PIU staff, DGEFC, CTAFs and other stakeholders.</li> </ul> <p>(C) Prepare and submit to the Association quarterly monitoring reports on the E&amp;S performance of the project.</p>			

CONCRETE MEASURES AND ACTIONS	CALENDAR	RESPONSIBLE ENTITY
(1.1) Prepare, disclose, consult, adopt and implement environmental and social risk management instruments required for the project, in accordance with the Association's requirements.		
(2.2) Develop and implement an occupational health and safety (OHS) management plan within the framework of the ESMP to assess and control the OHS risks and impacts of the project.		
(5.1) Establish a Process framework (PF) and a livelihood restoration plan (LRP) in accordance with ESS5.		
(6.1) Develop and implement a biodiversity management plan (BMP) integrated into the ESMP and compliant with ESS6.		
(8.1) Develop Cultural Heritage Management Plan (CHMP) and apply measures to protect cultural heritage and manage chance discoveries, in accordance with Law No. 2021-09 and ESS8.		
(10.1) Develop and implement a stakeholder engagement plan (SEP) aligned with ESS10.		
(10.2) Establish, make accessible and manage a grievance mechanism in accordance with ESS10.		