



Republic of Benin

GULF OF GUINEA NORTHERN REGIONS SOCIAL COHESION PROJECT- P175043 and ADDITIONAL FINANCING TO BENIN FOR THE GULF OF GUINEA NORTHERN REGIONS SOCIAL COHESION PROJECT - P175043.

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Negotiated

February 7th, 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Benin (the Recipient) is implementing the Gulf of Guinea Northern Regions Social Cohesion Project (P175043) (the Project), with the involvement of the Technical Secretariat for Coordination of the Social Cohesion Project (Secrétariat Technique à la Coordination du Projet de Cohésion Sociale, SETCO) under the supervision of the General Secretariat of the Office of the President of the Republic of Benin, as set out in the Original and Additional Financing Agreement (the Agreements). The International Development Association (the Association) has agreed to provide the original financing and additional financing for the Project, as set out in Agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for the Project referred to above.

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 or the Minister of Economy and Finance. 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[1]			
A	**ORGANIZATIONAL STRUCTURE** a. The parent project has set up an organizational structure, the Project Implementation Unit (PIU) with qualified personnel and appropriate resources to support the management of environmental, social, health and safety (ESHS) risks of the Project. The staff recruited as part of the parent project will remain in place, in particular an environmental specialist and a social specialist (including SEA /SH aspects) to ensure the implementation of the E&S documents prepared under the Additional Financing; and (ii) a Security specialist, charged with all security monitoring/management aspects, including liaison with the armed forces, local communities, and security audits of the Project sites. The social development specialist will take care of the questions and concerns of displaced and refugee people to ensure that their needs are effectively considered in the implementation of the project activities. b. SETCO, through its regional units involved in the Project, has recruited two (2) E&S specialists assistants to support the work of E&S specialists from the national PIU. These specialists will liaise with representatives of internally displaced persons/refugees and host communities and maintain dialogue with stakeholders who work with internally displaced persons and refugees and ensure that social risks related to internally displaced persons/refugees are identified, monitored and mitigated. These specialists shall regularly report to the national PIU regarding the environmental and social compliance of activities at the local level. There will be an additional recruitment of assistants in the team of E&S specialists in the regions depending on the extent of the intervention area of the activities under the Additional Financing. The qualifications, experiences, and terms of reference for the additional recruitment of these E&S specialists assistants shall be approved by the Association. c. 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 Agreements, and the Project Implementation Manual (PIM).	a. The PIU set up under the parent project shall be maintained throughout Project implementation. b. if needed, the recruitment of additional environmental and social specialists' assistants within the Regional Units of SETCO shall be done before the starting of the AF activities in field in collaboration with the Association. c. The organizational structure, including E&S and security specialists, shall be maintained throughout the Project implementation.	Technical Secretariat for Coordination of the Social Cohesion Project (SETCO) SETCO PIU PIU

B	**CAPACITY BUILDING PLAN/MEASURES** Prepare and implement the following capacity building measures: **1. As in the parent project, the training on environmental and social standards under the additional financing will focus, inter alia, on:** -ESS 1**:** Assessment and management of environmental and social risks and impacts, including the risks and impacts related to internally displaced persons/refugees - ESS 2: Labor and working conditions and the Labor Management Procedures (LMP) - ESS 3: Resource efficiency and Pollution Prevention and Management -ESS 4**:** Community health and safety and security management plan (SMP) -ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement -ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources -ESS 8: Cultural heritage -ESS 10: Stakeholder engagement and information disclosure and the Stakeholder Engagement Plan (SEP) The training shall target the following points: -Project Steering Committee / Regional Coordination Committee (RCC) -PIU (social specialist, environmental specialist, safety specialist, E&S assistants, procurement specialist) - Environmental and social focal points at the local level - NGOs working in the environmental and social fields in the Project areas - Relevant technical entities - Benin Environmental Agency (ABE); - Relevant local authorities **2.Occupational health and safety training:** As in the parent project, contractors and supervising entities shall train all workers involved in the Additional Financing activities, including security personnel, on occupational health and safety, first aid equipment, prevention of emergencies and how to prepare for and react to such situations. Contractors shall also ensure that the workers of their subcontractors are trained on the same subjects. The training shall target the following points: -Contractors - Contractor's workers (including any subcontractors) -Community workers	The trainings started under the original financing of the Project will be continued throughout the Project implementation Prior to the start of employment of newly recruited workers and those already working, training shall be provided quarterly to ensure that all staff are trained. Throughout the Project implementation	PIU with the support of other consultants/Training Center hired by the Project if necessary. PIU

	- Supervising entities - PIU - NGO **Information, Education and Communication (IEC)** Raise awareness among contractors' workers, including subcontractors' workers, community workers, and supervising entity mobilized on the sites to the environmental and social standards as well as on respect for Code of conduct and security measures. **3. Training on labor and working conditions** -Conditions of employment under national labor law - Code of conduct for suppliers / service providers and subcontractors; - workers' organizations; - Rules on child labor and minimum working age; - Workers' rights; -Worker complaints and SEA / SH complaints Discrimination and harassment (SEA / SH) / incidence at work. The training shall target the following stakeholders: - Contractor's workers (including any subcontractors) -Community workers - Supervising Engineers/Consulting ; -NGOs working in the social field in the area of the additional financing. **4. Training on environmental and social management** This training should provide knowledge about : - the process of selection and environmental and social classification of sub-projects ; - the procedures for organizing and carrying out the ESIA and the RP; - environmental policies, procedures and legislation in Benin; - Implementation monitoring process of the ESMP and the RP The training shall target the following stakeholders: -PIU (social specialist, environmental specialist, safety specialist, E&S assistants, procurement specialist) - Central and local technical structures involved in the additional financing - Benin Environmental Agency (ABE) **5. Training on grievance mechanism** The training shall focus on the following modules: - Registration and processing procedure; - Complaints' resolution procedure;	Prior to the start of employment of newly recruited workers and for those already working, training shall be provided quarterly to ensure that all staff are trained. Prior to the start of employment of newly recruited workers and for those already working, training shall be provided annually to ensure that all staff are trained.	PIU PIU

	- Documentation and handling of complaints ; - Use of the procedure by the various stakeholders; - SEA / SH complaints. The training shall target the following stakeholders: -PIU (social specialist, environmental specialist, safety specialist, E&S assistants, procurement specialist) -Local or regional committees for monitoring or managing complaints. -Technical structures - ABE - Relevant local authorities. -NGOs working in the social field in the area of the additional financing. **6. SEA/SH Risk Training** - Awareness and measures to prevent and mitigate the risks of SEA/SH; The themes, activities and target audiences will be defined in the updated SEA/SH action plan; -Dissemination of the updated SEA/SA action plan (activities, target groups) ; -Handling of SEA/SH complaints The training shall target the following stakeholders: -PIU (environmental and social specialists, security specialist, procurement specialist, monitoring and evaluation specialist), -Central and local technical structures, - ABE - Relevant local authorities. -NGO **7. Training on risks and management in the work phase targeting workers** **-** SEA/SH, child labor and forced labor; - GM - including the SEA/SH related grievance mechanism - Compliance with the code of conduct clearly mentioning the prohibition of SEA / SH and the penalties in the event of misconduct, etc. - Pollution and damage during the Project works, - Occupational Health and Safety. **8. Information / awareness on potential environmental and social risks targeting local populations / communities covered by the Additional Financing:** Information / awareness on potential environmental and social risks, including the Project SEA / SH, to elicit their commitment	Prior to the start of employment of newly recruited workers and for those already working, training shall be provided quarterly to ensure that all staff are trained. Prior to the start of employment of newly recruited workers and those already working, training shall be provided quarterly to ensure that all staff, actors and stakeholders involved are trained. Before the start of work and organize regular refresher sessions	PIU PIU -PIU -Contractors and Subcontractor workers

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	and participation in the identification of measures aimed at minimizing and mitigating negative environmental and social risks and impacts related to Project implementation.	Before the start of the works and throughout the Project implementation.	- PIU -Contractors - Supervising engineer / supervisory entity
MONITORING AND REPORTING			
C	**REGULAR REPORTING** The Recipient shall 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 but not limited to: • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, operation of SEA / SH sensitive grievance mechanism(s) 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. • Number and level of ownership of capacity building measures carried out. • Etc.	Quarterly reports, starting from the Effective Date of the original financing, to be prepared throughout the implementation of the Project. Submit each report to the Association no later than 15 days after the end of each quarter.	PIU
D	**CONTRACTORS' MONTHLY REPORTS** For the Additional Financing and as in the parent project, the Recipient shall require contractors and supervising firms to provide the PIU with monthly site monitoring reports on E&S performance (environmental, social, health and safety aspects) in accordance with the metrics specified in the respective bidding documents and contracts. These monthly reports shall be submitted to the Association by the Recipient upon request, as needed.	Monthly reports prepared from the signing of the contracts, and throughout the Project implementation.	- PIU -Contractors -Supervising firms -Service providers/suppliers

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
E	**INCIDENTS AND ACCIDENTS** The Recipient shall 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, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination (for example, discrimination against women, young people, people with disabilities, and minority groups, refugees, internally displaced persons, from other regions of the country or abroad), 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. Subsequently, upon request of the Association, the Recipient shall prepare a report on the incident or accident with sufficient/available details regarding the incident and /or accident, indicating the immediate measures taken or planned to remedy it, including any other information provided by a contractor and/or supervising entity, where appropriate. The Recipient shall arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. The Recipient shall 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 a detailed report within the same timeframe, unless a different timeframe is agreed with the Association. 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. This systematic reporting system shall remain in place throughout the Project implementation. 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. 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** **ENVIRONMENTAL AND SOCIAL ASSESSMENT**		PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	The environmental and social assessment was conducted through consultations with the various stakeholders under the parent project accompanied by an ESMF, the summary of which was widely disseminated in the beneficiary communities. Additional consultations shall be conducted in the new intervention communities of the additional financing to identify and evaluate the risks and potential negative environmental and social impacts of the Project, (including inter alia, security risks, SEA / SH) as well as appropriate mitigation measures consistent with ESSs. A particular emphasis shall be placed on consulting women's groups to identify their needs and suggestions during the assessment and other vulnerable person or groups to ensure integration of their particular needs into the Additional Financing risks mitigation measures **MANAGEMENT TOOLS AND INSTRUMENTS** 1. An Environmental and Social Management Framework (ESMF) including a Pest Management Plan (PMP) has been developed and disclosed under the parent project, consistently with the relevant ESSs and in a manner acceptable to the Association. The ESMF shall be maintained in place to manage risks and impacts associated with the additional financing. 2. Prepare and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP)] for sub projects that require a site-specific ESIA/ESMP, consistent with the relevant ESSs. 3. Require the implementing agencies, contractors, subcontractors, and supervising engineer associated with the sub-projects to prepare and implement the subproject site-specific Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP), as set out in the ESMF. The proposed subprojects [activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.	1. The ESMF developed, disclosed, consulted upon, and adopted on December 18, 2021, under the original financing of the Project is maintained and shall be implemented throughout Project implementation. 2. As with the original financing, site-specific ESIA and ESMP shall be prepared, disclosed, consulted upon, and adopted prior to the start of any activity requiring the development of a specific E&S instrument, and shall be thereafter implemented throughout Project implementation. 3. Prepare the ESMP and incorporate the ESMP as part of the respective bidding documents before launching the bidding process for the respective subproject/ Project activity prior to the carrying out of subproject/ Project activity that requires the preparation of such ESMP. Once finalized, implement the respective ESMP throughout Project implementation.	
1.2	**MANAGEMENT OF CONTRACTORS** Incorporate the relevant aspects of the ESCP, including inter alia, the relevant ESIA/ESMP and security documents and / or plans, as well as the Labor Management Procedures, and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms, as in the parent project.	During the preparation of the procurement documents and before the signing of respective contracts and effective start of the relevant services or works. Throughout the Project implementation.	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	As in the Parent Project, the Recipient shall continue to ensure that the contractors and supervising firms (i) comply with the E&S specifications of their respective contracts, and (ii) require their subcontractors to comply with the E&S specifications of their respective contracts in accordance E&S instruments referred to in section 1.1 above with regard to additional financing. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association upon request.	Supervise contractors and supervising Engineers, throughout Project implementation.	
1.3	**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. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.	Throughout the implementation of the original and additional financing.	PIU
1.4	**CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING** 1. Ensure that the CERC Manual includes a description of the E&S 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 CERC component, in accordance with the ESSs. 2. Implement the E&S provisions of the CERC Manual including, if applicable, the CERC-ESMF, and any assessments and plans required therein.	1. The preparation of the CERC Manual and, if applicable, other E&S documents, as relevant in form and substance acceptable to the Association is a withdrawal condition under Section III.B.1(b) of Schedule 2 of the Agreements. 2. In accordance with the timeframes specified in the CERC Manual including, if applicable, the CERC-ESMF, and any assessments and plans required therein.	- PIU - Designated authority for the CERC
1.5	**ASSOCIATED FACILITIES** Not applicable to the Project		
1.6	**USE OF RECIPIENT'S ENVIRONMENTAL AND SOCIAL FRAMEWORK** The Recipient's E&S Framework is currently not being considered for this Project.		
1.7	**COMMON APPROACH** There are no financing partners. Not applicable to the Project		
1.8	**ACTIVITIES SUBJECT TO RETROACTIVE FINANCING** Not applicable to the Project		
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	**LABOR MANAGEMENT PROCEDURES**		PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	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 maintained in place to manage labor and working conditions risks and impacts associated with the additional financing.	The LMP developed, disclosed and adopted on February 7, 2022, under the original financing of the Project is maintained and shall be implemented thereafter throughout the Project implementation.	
2.2	**OCCUPATIONAL HEALTH AND SAFETY (OHS) MANAGEMENT PLAN** The Recipient shall require contractors and subcontractors to prepare and implement OHS Management Measures specified in the ESIA / ESMP in accordance with ESS 2 and in a manner acceptable to the Association.	Prepare the OHS Management Measures prior to the start of the works, and thereafter implement the measures throughout Project implementation.	- PIU - Supervising Engineer. - Contractors/ subcontractors and suppliers
2.3	**GRIEVANCE MECHANISM FOR PROJECT WORKERS** Establish and operate a grievance mechanism (GM) for Project workers, as described in the LMP and consistent with ESS2. The GM developed for Project workers in the LMP of the Parent Project, shall be maintained to address 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 original financing of the Project shall be maintained throughout the implementation of the Additional Financing of the Project.	PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	**WASTE MANAGEMENT PLAN** Prepare and implement a Waste Management Plan (WMP), as part of the ESMP prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3. Ensure that the contractors develop, adopt, and implement a WMP (common and specific waste) in accordance with the provision of the ESMF and site specific ESIA/ESMP, in a manner acceptable to the Association.	Prepare the WMP prior to the actual start of construction works, and thereafter implement the WMP throughout the Project implementation. The same timeframe as for the adoption and implementation of the ESMP.	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.2	**RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** Develop and incorporate resource efficiency and pollution prevention and management measures (rationalization on raw materials, energy and water use and the maintenance of its quality) in the ESMP to be prepared under action 1.1 above and implement those measures for the sub-projects/ activities, to manage efficient consumption of these resources in accordance with ESS3. Ensure that the prevention and management measures for risks and potential impacts provided for the Pest Management Plan (PMP), included in the ESMF, are implemented in accordance with ESS3.	Same timeframe as for the preparation and implementation of the ESMP. These measures and actions shall be maintained and implemented throughout the implementation of the Additional Financing.	PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	**TRAFFIC AND ROAD SAFETY** Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.1 above. 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.	Same timeframe as for the preparation and implementation of the ESMP. Prior to the start of construction works and throughout the Project implementation.	PIU
4.2	**COMMUNITY HEALTH AND SAFETY** 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, risks of labor influx 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.	Same timeframe as for the preparation and implementation of the ESMPs.	PIU
4.3	**SEA AND SH RISKS** The SEA / SH Prevention and Management Action Plan developed under the parent project shall be updated in order to take into account the risks related to the context of internally displaced persons / refugees as well as host communities in the additional financing. ’'These measures will aim to raise awareness, prevent and mitigate the SEA/SH risks, including, but not limited to, the development of a code of conduct for workers and the organization of trainings to sensitize the various stakeholders of the Additional Financing.		PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		The SEA / SH Prevention and Management Action Plan of the original financing of the Project shall be updated, disclosed, consulted upon, and adopted no later than 3 months after the Additional Financing Effective Date and be implemented thereafter throughout Project implementation.	
4.4	**SECURITY MANAGEMENT**[2] 1. The Recipient shall update the security risks assessment (SRA) carried out under the parent project and, implement the updated 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, and the concerns of internally displaced persons / refugees/ host communities, in accordance with the requirements of ESS 1 and ESS 4 in a manner acceptable to the Association. 2. The following measures shall be adopted to ensure that the engagement to security or personnel for provision of security of project workers, sites and / or assets, is carried out in accordance with ESS 4: a. Assess the risks and impacts of engaging security personnel and implement measures to manage these risks and impacts, (including a stand-alone security risk management plan), guided by the principles of proportionality and good international industry practices, and by applicable law, with regard to the recruitment, rules of conduct, training, equipping and monitoring of such security personnel; b. Adopt and apply standards, protocols and codes of conduct for the selection and use of security personnel, and screen such personnel to verify that they have not engaged in illegal or abusive behavior in the past, including SEA / SH or excessive use of force; c. Ensure that such personnel are properly instructed and trained, prior to deployment and on a regular basis, on the use of force and proper conduct, as outlined in the parent Project Operational Manual, the ESMF, and the Security Management Plan; d. Ensure that the stakeholder engagement activities under the Stakeholder Engagement Plan (SEP) include a communication strategy on the involvement of security personnel in the Additional Financing;	Update the SMP no later than 3 months after the AF effective date and before starting relevant works and implement throughout the Project implementation. Carry out a, b), and c), before deploying the relevant security personnel under the Project and implement throughout Project implementation. d) and e) as set out under actions 10.1 and 10.2 respectively. Notify the Association after receiving the concern or grievance in the timeframe specified in action E above. f) within the timeframes agreed with the Association.	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	e. Ensure that any concerns or grievances regarding the conduct of security personnel are received, monitored, documented (considering the need to protect confidentiality), resolved through the Additional Financing grievance mechanism (see action 10.2 below) and reported to the Association no later than two (2) days after being received; and f. When the Association so requires, after consultation with the Recipient: (i) promptly appoint a third-party monitoring consultant, whose terms of reference, qualifications and experience are satisfactory to the Association, in order to visit and monitor the Project area where security personnel are deployed, collect relevant data and communicate with Project stakeholders and beneficiaries; (ii) request the third-party consultant in charge of monitoring to prepare and submit monitoring reports, which shall be quickly made available to the Association and discussed with it; and (iii) promptly take any action requested by the Association after examining the reports of the monitoring third party consultant.		
4.5	**DAM SAFETY (FOR ANNEX A ESS4)** Not applicable to the Project		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
5.1	**RESETTLEMENT [FRAMEWORK] [PLAN] or [PLANS]** 1. An RF has been developed and disclosed under the parent project, consistently with ESS5. The RF shall be maintained in place to manage any risks, potentially associated with resettlement and resettlement-related opportunities and compensation. 2. Prepare and implement a Resettlement Plan (RP) or a Livelihood Restoration Plan (LRP) for each activity under the Project for such RP or LRP is required, as set out in the RPF and consistent with ESS5. Ensure that the Grievance Mechanism (GM) related to the relocation is reflected in the Project RF, site-specific RP and SEP and take into account the SEA/SH. This GM shall be operational and accessible to all those involved in land acquisition and resettlement activities.	1. The RF developed, disclosed, consulted upon, and adopted on December 14, 2021 under the original financing of the Project is maintained and shall be implemented thereafter throughout Project implementation. 2. Prepare and implement the respective RP, LRP or Audits prior to carrying out the relevant works, including ensuring that before taking possession of the land and related assets, full compensation has been provided and as applicable displaced people have been resettled and moving allowances have been provided before any use of the sites considered for Project activities. Before the start of the implementation of the RP, LRP or Audit, and then throughout the Project implementation.	PIU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	**BIODIVERSITY RISKS AND IMPACTS** Adopt and implement biodiversity management measures set out in the parent project ESMF, in application of the ESIA / ESMP prepared for the Project activity, in a manner acceptable to the Association. Where a site-specific ESIA / ESMP identifies significant risks and impacts on biodiversity, prepare and implement a Biodiversity Management Plan (BMP), in accordance with the guidelines of the ESIA/ESMP prepared for the Project activity, and consistent with ESS6. Specific E&S documents shall be submitted to the Association for approval before launching procurement documents and contracts with contractors and supervising entities.	Same timeframe as for the adoption and implementation of the ESMF and ESIAs/ESMPs, thereafter implementation of these measures throughout Project implementation. Prepare the BMP prior to the start of the large and small-scale construction works, and thereafter implement the BMP throughout Project implementation.	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	**INDIGENOUS PEOPLES [FRAMEWORK] [PLAN] or [PLANS]** Not applicable to the Project		
ESS 8: CULTURAL HERITAGE [The relevance of ESS8 is established during the ESA process.			
8.1	**CULTURAL HERITAGE RISKS AND IMPACTS** Prepare and implement a Cultural Heritage Management Plan (CHMP) (likely to be affected by the parent project and the Additional Financing, if applicable), as described in the parent project ESMF, in accordance with the guidelines of the of the ESIA and ESMP prepared for the Project activity, and consistent with ESS8.	Prepare the CHMP prior to the start of the works, and thereafter implement the CHMP throughout Project implementation.	PIU
8.2	**CHANCE FINDS** Describe and implement the "chance finds" procedures as mentioned in the parent project ESMF. Likewise, any ESIA/ESMP to be prepared shall include such a section on Chance finds/cultural heritage. Clauses on these “chance finds” shall be included in all works contracts, even in cases where the probability is very low. This “chance finds” procedure shall also be carried out by the PIU, in collaboration with the communities for the activities to be implemented by the community workers and as part of the CDD approach.	Same timeline as for the adoption and implementation of the ESMF and the site-specific ESIA/ESMP, thereafter implement the procedures throughout Project implementation.	PIU
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	**ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)** Not applicable to the Project		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	**STAKEHOLDER ENGAGEMENT PLAN** The Stakeholder Engagement Plan (SEP) developed and implemented under the parent project, has been updated following the additional consultations that will be organized in the intervention areas of the additional financing and with internally displaced persons/refugees/ host communities, and including measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult in a culturally appropriate way, free of manipulation, interference, coercion, discrimination and intimidation, consistent with ESS 10.	The SEP has been updated and was disclosed on February 3rd before the Project Appraisal, and thereafter implement the SEP throughout Project implementation.	PIU
10.2	**PROJECT GRIEVANCE MECHANISM**	The updated GM shall be operational no later than 3 months after the AF Effective Date.	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	The Grievance Mechanism (GM) developed and implemented in the parent project implementation shall be extended to take into account the contexts of the Additional Financing communities, including the concerns and grievances of the internally displaced persons and refugees; it shall be accessible to receive and facilitate the resolution of concerns and grievances related to the entire project, promptly and effectively, in a transparent manner, culturally appropriate and readily accessible manner to all Project-affected-parties, at no cost and without retribution, including concerns and grievances filed anonymously, all in accordance with ESS 10. The updated GM shall also receive, register, and address concerns and complaints related to SEA / SH in a safe and confidential manner, with specific entry points for survivors and shall ensure a referral system to provide assistance to survivors as required, through identified gender-based violence service providers in the Project area. The GM shall be supported by a communication plan to ensure that the local populations affected (including the host communities for internally displaced persons and refugees) are aware of the existence of this mechanism and know how to file complaints. The dissemination and awareness-raising channels must consider the languages and other constraints of these new communities and the internally displaced/refugees. The Recipient shall ensure that all intervention communities are aware of the procedures for filing and handling complaints and other remedies.	The updated GM will be maintained and will remain operational throughout the Project implementation	- PIU -Psychosocial and legal assistance centers
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness: A. C. E. 1.1 2.1 2.2 2.3 3.1 3.2 4.2 4.3 4.4 8.2 10.1 10.2			