



GOUVERNEMENT
DE LA RÉPUBLIQUE
DU BÉNIN



Republic of Benin

**Dogo Bis Multipurpose Dam Project - Phase 1
under the Multiphase Programmatic
Approach(P513979)**

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

Appraisal Version

April 30, 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Benin (the Recipient) will implement the Dogo-Bis Multipurpose Dam Project - Phase 1 under the Multiphase Programmatic Approach (the Project), with the involvement of the Presidency of the Republic of Benin / Project Implementation Unit (PIU/UGP), as set out in the Financing Agreement (the Agreement). The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the Agreement.
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 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 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 under the Agreement, 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 Agreement. 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.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>a. Maintain the Project Implementation Unit established for the Benin Electricity Access Scale-up Project (IDA Credit No. 6901-BJ) (“PIU”) with adequate resources and qualified E&S staff, all in agreement with the Association and with experience, qualification and terms of reference acceptable to the Association, to include at minimum: one environmental specialist, one social development and resettlement specialist and one communication specialist (GRM).</p> <p>b. Recruit a E&S technical expert with international expertise and with experience, qualifications, and terms of reference acceptable for the Association</p> <p>c. Adequate resources shall be provided for E&S risk management and compliance monitoring, and additional staff shall be recruited as needed, all in agreement with the Association and with experience, qualification and terms of reference acceptable to the Association.</p> <p>d. Recruit an independent E&S expert panel with experience, qualification and terms of reference acceptable to the Association to support the preparation of high-quality E&S studies and systems and to provide technical assistance for all aspects of dam management.</p>	<p>a. Ensure that all E&S staff, are recruited or appointed by the Effective Date with experience, qualification and terms of reference acceptable to the Association and maintain them throughout Project implementation.</p> <p>b. Within three (3) months after the Effective Date and maintained throughout Project implementation.</p> <p>c. Throughout Project Implementation.</p> <p>d. Within two (2) months after the Effective Date and maintained throughout Project implementation.</p>	PIU/Presidency of the Republic of Benin
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement a capacity building plan that includes: ESF/ESSs, LMP/OHS, SEA/SH, Project and Workers’ GRMs, dam safety E&S measures, chance finds and cultural heritage, traffic/road safety, security risk management among others. These training modules will be delivered to the PIU, contractors, supervising firms, and relevant local authorities and communities on a regular basis. Adequate resources shall be provided to ensure the effective delivery of this plan.</p>	Beginning on the Effective Date and implemented on a regular basis per the annual workplan, with updates as necessary throughout the Project implementation.	PIU/ Presidency of the Republic of Benin
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association quarterly monitoring reports regarding the environmental, social, health and safety (E&S) performance of the Project. The reports shall include among others:</p> <p>a) Status of preparation and implementation of E&S documents required per the ESCP.</p>	Beginning on the Effective Date, quarterly reports shall be produced throughout the implementation of the Project and submitted to the Association no later than 15 days after the quarter has expired.	PIU/ Presidency of the Republic of Benin

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> b) Status of the RAP implementation for Phase 1 including any pending issues and GRM cases. c) Summary of stakeholder engagement activities carried out per the Stakeholder Engagement Plan and the communication strategy. d) Complaints submitted to the grievance mechanism(s), the grievance log, and progress made to resolve them. e) E&S performance of contractors and subcontractors as reported through monthly contractor and supervision firm reports. f) Labor inspector reports. g) Number and status of resolution of incidents and accidents reported under action E below. h) Summary of the monitoring of biodiversity management aspects. 		
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors/supervising firms to submit monthly E&S performance reports, as per bidding documents and submit reports for review by the Association. A final E&S compliance report is required before the authorization of civil works. These reports shall be forwarded to the Association by the PIU upon request. A template for these reports will be prepared by the E&S technical advisor in the PIU.</p>	<p>Monthly by the 5th of the following month. PIU will submit to the Association within 5 days of receipt.</p> <p>E&S compliance report submitted by PIU 10 days before authorization given for the start of civil works.</p>	<p>PIU/ Presidency of the Republic of Benin</p>
E	<p>INCIDENTS AND ACCIDENTS</p> <p>a. 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 or insecurity, 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 SEA/SH or communicable disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p> <p>b. Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root cause(s). Prepare, agree with the Association and implement a Corrective Action Plan as needed that</p>	<p>a. Notify the Association no later than 48 hours after learning of the accident or incident. Provide available details upon request.</p>	<p>PIU/ Presidency of the Republic of Benin</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.	b. Provide 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 in writing by the Association. Fully implement the Corrective Action Plan.	
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PL ANS</p> <p>a. Implement the Environmental and Social Impact Assessment (ESIA) for the rural access roads, rural electrification and the social infrastructure activities under Component 1.</p> <p>b. Require contractors to prepare and implement Construction ESMPs (C-ESMP). These C-ESMPs shall also include security risk management as needed and will be proportional to the activity.</p> <p>c. Conduct E&S screening for the social infrastructure under Component 1.3, including the risks of SEA/SH and social exclusion of vulnerable individuals and groups. Based on the E&S screening, prepare the necessary E&S instruments proportionate to the risk and impacts (e.g. ESIA). All activities under Component 1.3 that require land acquisition shall be excluded.</p>	<p>a. The ESIA was disclosed on January 26, 2026. Implement the ESIA throughout Project implementation.</p> <p>b. C-ESMPs shall be finalized before the start of civil works.</p> <p>c. The required E&S instruments (e.g., ESIA) following the results of the E&S screening shall be prepared, adopted and disclosed prior to the commencement of relevant site-specific Project activities and shall be implemented throughout Project implementation.</p>	PIU/ Presidency of the Republic of Benin
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP 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.</p> <p>Supervise contractors throughout Project implementation. Copies of relevant contracts shall be provided to the Association upon request.</p>	PIU/ Presidency of the Republic of Benin

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.3	<p>TECHNICAL ASSISTANCE</p> <p>All technical assistance, consultancies, studies (including feasibility studies), capacity-building activities, training, institutional and regulatory capacity building on the E&S aspects of dam management, preparation of the E&S assessments and instruments for subsequent phases and any other technical assistance activities under the Project, shall be carried out in accordance with terms of reference acceptable to the Association, consistent with the ESSs, and their outputs shall be consistent with the ESSs. Thereafter, prepare and finalize the output of such activities in compliance with the terms of reference.</p>	Throughout implementation. Project	PIU/ Presidency of the Republic of Benin
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>a. Ensure that the labor management and working conditions of Project workers are consistent with this ESCP and with the Recipient’s labor framework, which includes, inter alia, the country’s relevant policy, legal and institutional framework, including its national, departmental, or local implementing institutions, and the applicable laws, regulations, procedures, and implementation capacity.</p> <p>b. Promptly notify the Association of any changes to the Recipient’s labor framework that may materially adversely affect the Recipient’s ability to manage the labor risks and impacts of the Project in line with the ESS2 and the immediate measures taken or that are planned to be taken to address said changes and the ensuing potential risks and impacts of the Project. If, in the opinion of the Association, such changes adversely affect relevant labor risk management aspects of the Project, the Recipient shall agree to implement measures and actions to address them in a manner acceptable to the Association. The ESCP shall be updated to reflect such agreed actions.</p> <p>a. Ensure that the Labor Code is adequately implemented and that all arrangements necessary for ensuring compliance have been made prior to engaging Project workers. These arrangements include:</p> <ul style="list-style-type: none"> i. agreements entered into with DGT and the Labor Inspectorate to ensure adequate capacity and monitoring of compliance with relevant laws and regulations for monitoring Phase 1 activities; ii. all monitoring requirements per the Labor Code, in particular for child labor, protection of women, harassment, discrimination and protection of vulnerable workers, included in the Project Implementation Manual (PIM) to be disclosed prior to implementing these measures. 	<p>a. Throughout implementation Project</p> <p>b. Notify the Association immediately after taking notice of the change to the Recipient’s labor framework. Subsequent actions, if requested by the Association, shall be reflected in an updated ESCP as indicated in paragraph 4 of the Initial Section of this ESCP.</p> <p>c. Enter into one agreement with the DGT and one agreement with the Labor Inspectorate no later than the Effective Date and implement throughout Project implementation.</p> <p>d. Training modules prepared and delivered before the start of civil works and as needed throughout Project implementation.</p>	<p>PIU/ Presidency of the Republic of Benin and DGT and Labor Inspectorate</p> <p>PIU with support of DGT and Labor Inspectorate</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	c. Deliver training on the Labor Code to all contractors and workers prior to the start of civil works. This training should include provisions related to terms and conditions of employment, employer-worker relations, OHS, SEA/SH, prohibition on child and forced labor, worker's GRM and ESIRT/reporting requirements.		
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN a. Integrate OHS measures to manage the OHS risks and impacts of the Project in the ESIA to be prepared under action 1.1 above. b. Require contractors and subcontractors to prepare and implement OHS Management Measures in accordance with the Construction ESMP to be prepared under action 1.1.	a: Same timeline as action 1.1. b: Same timeline as action 1.1.	PIU/ Presidency of the Republic of Benin
2.3	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers consistent with the agreements with DGT and the Labor Inspectorate to receive and address worker grievances in compliance with the Labor Code.	Ensure grievance mechanism is operational and accessible prior to the start of works and ensure that it is functional throughout Project implementation.	PIU/ Presidency of the Republic of Benin
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Incorporate solid waste—hazardous and non-hazardous management measures (Hazardous and Non-Hazardous Waste Management Plan) into the ESIA to be prepared under action 1.1 above and implement these measures throughout Project implementation, consistent with ESS3.	Same timeline as action 1.1.	PIU/ Presidency of the Republic of Benin
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency (e.g. energy, water and raw materials) and pollution prevention and management measures in the ESIA to be prepared under action 1.1 above.	Same timeline as action 1.1.	PIU/ Presidency of the Republic of Benin
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY a. Incorporate measures to manage traffic and road safety risks as outlined in the ESIA under action 1.1 above. This includes the ESIA already prepared and the activity specific ESIA that may be prepared. b. Road safety measures will be also included in the PIM and C-ESMP and widely shared with contractors and project workers. In addition to training and capacity building, good practices regarding public sensitization will be used.	a. Same timeline as action 1.1. b. Before the start of works and implemented throughout Project implementation	PIU/ Presidency of the Republic of Benin
4.2	COMMUNITY HEALTH AND SAFETY	a. Same timeline as action 1.1.	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>a. Assess and manage specific risks and adverse impacts to the community arising from Project activities, including risks of labor influx, emergency situations, and include mitigation measures in the ESIA's under action 1.1.</p> <p>b. Implement the communication and engagement strategy outlined in the SEP.</p>	b. Validate before start of civil works and updated and implemented throughout Project implementation.	PIU/ Presidency of the Republic of Benin
4.3	<p>SEA AND SH RISKS Integrate SEA/SH risk management measures into the ESIA and PIM and C-ESMPs.</p>	Same timelines as actions 1.1.	PIU/ Presidency of the Republic of Benin
4.4	<p>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 needed.</p>	Throughout Project implementation	PIU/ Presidency of the Republic of Benin
4.5	<p>DAM SAFETY (FOR ANNEX A ESS4) Establish and maintain a Dam Safety Panel of Experts (PoE) with internationally recognized experts and with terms of reference and composition acceptable to the Association, to, inter alia, review and advise on matters related to safe and others critical aspects related to the Project dam, its ancillary structures, the catchment area, the area surrounding the reservoir, and downstream areas, as relevant.</p>	Within two (2) months after the Effective Date and maintained throughout Project implementation.	PIU/ Presidency of the Republic of Benin
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT PLANS a. Finalize, disclose and implement the Resettlement Action Plan (RAP) consistent with ESS5 for the works that will be financed under Phase 1. This includes the establishment of the georeferenced database to enhance transparency and accountability and recruit and onboard the NGO that will assist with RAP implementation.</p> <p>b. Ensure adequate coordination with ABE and the Ministry of Finance to ensure that the RAP implementation proceeds according to the agreed timelines and without causing delays for the start of civil works.</p>	a. Prior to the start of 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. Inform the Association about any delays or issues. Recruit and on board the NGO selected to support RAP implementation by the Effective Date.	PIU/ Presidency of the Republic of Benin

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		b. Throughout Project implementation	
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>a. Adopt and implement, as part of the ESIA, requirements for screening and mitigation measures to ensure that Project activities do not alter or cause the destruction of critical and/or natural habitats, in accordance with ESS 6.</p> <p>b. Exclude from Project financing any activity on the negative list included in the screening procedures of the ESIA, including activities with significant risks and/or adverse impacts on biodiversity and those that would need clearing of any type of forested land.</p> <p>c. Ensure that studies and Technical Assistance activities supported under Phase 1 are consistent with ESS6, in particular provisions of paras 26 and 27 on legally protected and internationally recognized areas of high biodiversity value.</p>	<p>a. Same timeframe as 1.1 and implement throughout Project implementation</p> <p>b. Throughout Project implementation</p> <p>c. Throughout Project implementation</p>	PIU/ Presidency of the Republic of Benin
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Not considered relevant		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS</p> <p>a. Describe and implement the chance find procedures as part of the ESIA already prepared or which could be prepared under action 1.1 above, and consistent with ESS8.</p> <p>b. Include guidance for how to manage “chance finds” or other cultural heritage in the PIM per the national law.</p>	<p>a. Same timeline as action 1.1,</p> <p>b. Guidance inserted in the PIM and applied during works.</p>	PIU/ Presidency of the Republic of Benin
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
9.1	Not considered relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>Implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall 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>	The SEP was disclosed on January 26, 2026. Implement the SEP throughout Project implementation.	PIU/ Presidency of the Republic of Benin
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>	Establish a functional grievance mechanism by the Effective Date and thereafter maintain and operate the mechanism throughout Project implementation.	PIU/ Presidency of the Republic of Benin
INDICATORS FOR IMPLEMENTATION READINESS			
<p>The following actions are indicators for implementation readiness:</p> <ul style="list-style-type: none"> • A. Organizational Structure –PIU with 1 environmental specialist, 2 social specialists (community development and resettlement & communication and engagement/GRM) and E&S technical advisor is set up and fully operational including budget and other resources confirmed and available. Both Panels of Experts have been recruited. RAP NGO has been recruited and has started work. These staffing levels will be reviewed and revised if needed at mid-term review or as needed. • 2.1 Capacity building has been provided to DGT and Labor Inspector and contractors and workers, Project workers have been made aware of the Labor Code and signed the Code of Conduct. • 2.3 Ensure that the necessary arrangements have been made with DGT and the Labor Inspectorate to receive and address worker grievances per the Labor Code. 			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> • 5.1 RAP reviewed, finalized and disclosed prior to the start of any civil works. • 6.1 Develop and implement a biodiversity management plan (BMP) integrated into the ESIA consistent with ESS6. • 10.1 – Planning for SEP implementation has been given the NO by the Association and implementation started. • 10.2 – Project GRM designed with SOPs and referral pathways established and operational. 		