Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 23-Feb-2016 | Report No: PIDISDSA17249
**BASIC INFORMATION**

<table>
<thead>
<tr>
<th>A. Basic Project Data</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Country</strong></td>
</tr>
<tr>
<td>Benin</td>
</tr>
<tr>
<td><strong>Region</strong></td>
</tr>
<tr>
<td>AFRICA</td>
</tr>
<tr>
<td><strong>Lending Instrument</strong></td>
</tr>
<tr>
<td>Investment Project Financing</td>
</tr>
</tbody>
</table>

**Financing (in USD Million)**

<table>
<thead>
<tr>
<th>Financing Source</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>International Development Association (IDA)</td>
<td>68.00</td>
</tr>
<tr>
<td><strong>Total Project Cost</strong></td>
<td><strong>68.00</strong></td>
</tr>
</tbody>
</table>

**Environmental Assessment Category**

-  

**Decision**

Track II-The review did authorize the preparation to continue  

Other Decision (as needed)

Type here to enter text  

**B. Introduction and Context**

**Country Context**

*Benin is a low income country of ten million people which has made significant progress economically and politically over the last 25 years.* Following the 1990 National Conference which laid the foundations for a new democratic constitution, the organization of national multiparty elections, as well as for the decentralization process which became effective in 2002, the annual Gross Domestic Product (GDP) growth has averaged 4 to 5 percent over the past two decades.  

*Despite economic growth, progress in poverty reduction has been limited.* In 2015, the poverty rate was estimated at 40.1 percent, up from 36.2 in 2011, with important disparities between urban/peri-urban areas
Benin has seen the proportion of its urban population increase over the last decade from 38.9 to 48.2 percent, further complicating the capacity of urban municipalities to provide adequate basic services to their population. The annual growth rate in urban areas of Benin is 4.8 percent (compared with 2.6 percent in rural areas), and nearly 20 percent of the total population is concentrated in the Grand Nokoué region formed by four coastal municipalities (called “communes”). While the population in Cotonou and Porto Novo has remained relatively stable over the last decade, neighboring municipalities have seen their population double, as they received the bulk of the urban-rural migration and are transformed into urban and peri-urban dormitory areas to support the region’s economic growth. The majority of the migrants end up in parts of the cities that are already crowded, suffer from inadequate WSS and solid waste services, and are prone to seasonal flooding.

Another major source of urban growth are Benin’s small towns. Officially part of the rural landscape where 77 percent of the agricultural workforce is hosted, these small towns are of major strategic importance to Benin’s socio-economic development: they represent 35 percent of the country’s GDP and approximately 30 percent of the country’s population. In order to rectify disparities between regions, there is a need to promote a decentralization policy capable of helping small towns find the resources needed to engage in effective poverty reduction and improve the delivery of basic services to continue to support growth.

Sectoral and Institutional Context

Following the decentralization process, the responsibility of WSS service delivery has gradually been devolved to municipalities. In small towns and rural areas, the Ministry of Energy, Water and Mining (MEEM)’s Drinking Water Public Service and Regulation Directorate (DSPER) and its regional offices provide guidance to municipalities and monitor water services under their responsibility, including when operation and maintenance (O&M) of water supply systems is delegated to private operators (OP) or water consumers associations (ACEPs). In large cities and communal capitals, Benin’s National Water Company (SONEB) continues to play an important role as the operator of water supply systems, as well as the “Maître d’ouvrage” for both water supply and septage treatment. In addition, regulation and policy-making for urban sanitation is led by the Ministry of the Living Environment and Sustainable Development (MCVDD)’s Sanitation Directorate (DA), whereas the Ministry of Health’s Public Health Directorate (DNSP) is responsible for policy-making related to hygiene and sanitation promotion and behavior change communication (BCC) in both rural and urban areas.

Despite a clear institutional setting and strong political commitment towards the achievement of national targets, access to WSS continues to show unequal progress across the country. In 2015, only 36 and 7 percent of the urban and rural population had access to improved sanitation facilities, respectively. In addition, while Benin has met its Millennium Development Goals (MDGs) targets for access to improved water sources with 85 and 72 percent in urban and rural areas, respectively, significant improvements are now needed to achieve the Sustainable Development Goals (SDGs). For example, access to piped water into the premises remains low, particularly in rural areas with 5 percent, also indicative of the municipal finance and capacity challenges
brought with the decentralization process. Indeed, while municipalities can count on local revenues from taxes and transfers from the central government, resources often remain insufficient and municipalities often lack the technical and monitoring capacity to achieve universal and equitable access to WSS services.

Private sector participation in the management of small town water systems has been promoted by the Government of Benin (GoB) since 2005, but many challenges remain to ensure sustainability of services. In 2007, the sector introduced a lease-type public-private partnership (PPP) model (“affermage”) between municipalities and small-scale OPs (see Annex 2 for details) and in 2014, water systems managed under the affermage contract were serving an estimated 28 percent of Benin’s population. Despite this rapid growth, the implementation of this model faced serious challenges, such as the lack of transparency in the tendering procedures, poor financial and commercial management performance, as well as the inability of OPs to provide complementary funding.

In response to these challenges, and to further strengthen the professionalization of water services in small towns, a “subsidized concession” model was tested in 2014. Under this enhanced PPP model, investment obligations were introduced for the OPs to leverage the limited public funds available, and clusters of several water systems were tendered under one contract to reduce transaction costs and attract commercial banks. The early success of the subsidized concession pilot in three municipalities will constitute the basis for this operation’s water supply interventions.

As part of its Urban Sanitation Masterplan for the Grand Nokoué Region, the GoB has opted for on-site sanitation as the most cost-effective means to accelerate access to improved sanitation facilities and eliminate open defecation. In 2011, open defecation stood at 25 percent in urban areas, fueled by the transposition of behaviors of migrants from rural areas where open defecation stood at 77 percent, and less than one percent of the households were connected to a sewerage network. Fecal waste is often disposed of unsafely in the region, reaching 93 percent in Abomey Calavi and Cotonou, mostly due to losses associated with poorly built or managed on-site facilities. Emptying and desludging of latrines and septic tanks are typically handled mechanically by private operators and, while it is part of the DA’s mandate to regulate this part of the fecal sludge service chain, it lacks resources for monitoring and enforcement. Sludge is currently trucked to the privately-owned Ekpé Fecal Sludge Treatment Plant (FSTP), but this FSTP is in need of major repairs and is unable to handle on its own the growing needs of the Region. In addition, while the DNSP has experience in rolling out rural sanitation campaigns as reflected in its 2012 Hygiene Promotion and Basic Sanitation Strategy, such campaigns have yet to be adapted to and operationalized in an urban context in Benin.

In the last decade, the World Bank has provided technical assistance (TA) and financing to the rural water supply and urban sanitation sub-sectors, through its Water and Sanitation Program (WSP) and “Benin Emergency Urban Environment Project” (PUGEMU), providing the analytical and strategic basis for the proposed operation. By supporting the consolidation of the rural water sector reform promoting domestic private sector participation in water supply and helping the GoB define a long-term institutional and financing plan for sustainable fecal sludge management (FSM) in urban areas, the Project will continue to complement current support provided by other financial and technical partners focusing on rural sanitation and urban water supply. For instance, with support from a large group of partners active in urban water, the population served by SONEB has increased annually by an average of 7 percent in the last five years. As for rural sanitation, the Embassy of Netherlands, UNICEF, the WSS Collaborative Council and various NGOs are supporting DNSP in its
objectives of tackling the high levels of open defecation and increasing coverage of improved sanitation facilities by 2 to 3 percent annually, as indicated in its most recent medium-term expenditure framework.

C. Proposed Development Objective(s)

Development Objective(s) (From PAD)

The proposed development objectives of the Project are to: (i) increase access to water supply and sanitation in selected small towns and urban areas in the Recipient’s territory; (ii) strengthen service delivery capacity of water supply and sanitation sector institutions in selected small towns and urban areas in the Recipient’s territory; and (iii) in the event of an Eligible Crisis or Emergency, provide immediate and effective response to said Eligible Crisis or Emergency.

Key Results

The PDO will be measured against the following indicators: (i) people provided with access to “improved water resources” under the project – rural (number) [core]; (ii) number of water supply systems managed by a professional operator under a “subsidized concession” contract; (iii) people in urban areas provided with access to “improved sanitation” under the project (number) [core]; and (iv) an urban hygiene promotion and sanitation strategy is defined and operationalized.

D. Project Description

The Project will have the following four components:

Component 1: Scaling-up the Small Town Water Supply Subsidized Concession Model. To support the guiding principles of the rural and small town water supply national strategy, this component will strengthen the stakeholders involved in water service delivery in small towns and contribute to funding water system rehabilitations, constructions or expansions in selected municipalities.

1.1. Institutional strengthening of stakeholders involved in water supply service delivery in small towns.

(a) Strengthening the regulation capacity of the MEEM’s DSPER, by: (i) developing national monitoring and regulation tools for water service delivery in rural areas and small towns, including a tariff setting system and a water connection policy; (ii) building regional water meter testing and calibration centers and carrying out corresponding training; and (iii) developing benchmarking tools to monitor the performance of private operators;

(b) Strengthening the planning and monitoring capacity of municipalities, through: (i) the carrying out of training in the preparation of the transactions and bidding documents for the subsidized concessions contracts; (ii) the carrying out of training in water supply assets management and water investments planning; (iii) the carrying out of training and use of mobile data collection tools to support municipalities in performance monitoring and control of private operators; and (iv) the carrying out of training in citizen engagement for municipalities and local ACEPs;

(c) Strengthening the capacity of the domestic private sector to participate in the subsidized concession schemes, through: (i) the carrying out of training in PPP transactions, business plan development, commercial management and operational efficiency; and (ii) contributing to a dedicated guarantee line established under the National Guarantee and Small and Medium Enterprise Assistance Fund (FONAGA)’s Risk-Sharing Facility (RSF) to improve the water supply private sector’s ability to apply
for specific products such as commercial loans, advances for works and guarantee instruments;
(d) **Strengthening the water quality monitoring capacity of the DNSP**, through: (i) the carrying out of training in the implementation and monitoring of PGSSEs; and (ii) constructing and equipping a water quality reference laboratory.

**1.2. Rehabilitation and expansion of water supply networks.**

(a) **Co-financing the rehabilitation, construction or expansion of water supply systems under the subsidized concession model**, by contributing to a dedicated public budget line established under the sector’s objective-based programmatic budget (BPO), through fiscal transfers to the municipalities’ budgets to be used in the concession contracts as public subsidy, which will be further complemented by the private concessionaire’s financing.

**Component 2: Improving FSM in Grand Nokoué Urban and Peri-Urban Areas.** This component will support public and private actors to ensure clarity on the institutional arrangements for effective urban sanitation service delivery, particularly in the Grand Nokoué Region, and contribute to funding sanitation solutions and infrastructure in selected areas, in order to improve fecal sludge containment and reduce pollution from the lack of fecal sludge collection and treatment.

**2.1. Institutional strengthening of stakeholders involved in FSM in urban and peri-urban areas.**

(a) **Strengthening the sanitation planning, monitoring and evaluation (M&E) and technical capacity of SONEB**, through: (i) the carrying out of training in sanitation assets management, O&M, as well as investment planning related to the Urban Sanitation Masterplan; (ii) the acquisition of equipment relative to sanitation professions for SONEB’s training center; and (iii) the carrying out of training in the preparation of technical specifications and terms of reference related to sanitation works;

(b) **Strengthening DA’s capacity to regulate, control and re-organize the urban fecal sludge service chain**, through: (i) developing technically and financially suitable fecal sludge containment options for urban and peri-urban households, jointly with the DNSP, as well as their integration in the urban construction norms; (ii) developing environmental and quality control norms for fecal sludge management, as well as the corresponding M&E framework; and (iii) developing innovative business solutions for and standardizing fecal sludge emptying and transport services;

(c) **Strengthening DNSP’s capacity to develop and manage a national program to intervene in urban and peri-urban sanitation**, through: (i) defining an urban hygiene promotion and sanitation strategy, in coordination with the DA, including aspects of community engagement and gender mainstreaming in urban sanitation; and (ii) developing social marketing methodologies to trigger behavior change related to open defecation and use of adequate fecal sludge containment solutions;

(d) **Strengthening the capacity of the domestic private sector to participate in the urban fecal sludge service chain**, through: (i) developing innovative business solutions to improve desludging and sludge transport; (ii) developing PPP arrangements for the O&M of fecal sludge treatment facilities; and (iii) contributing to a dedicated guarantee line established under the FONAGA’s RSF to improve the sanitation private sector’s ability to apply for specific products such as commercial loans, advances for works and guarantee instruments.

**2.2. Household-level sanitation in urban and peri-urban areas.**

(a) **Increasing access to improved sanitation**, through implementing gender-sensitive total sanitation and
sanitation marketing campaigns, as well as BCC activities, by working with citizen/neighborhood organizations to induce a dynamic in support of a collective approach to changing behaviors, and connect households to fecal sludge emptying and transport services.

2.3. Urban and peri-urban septage collection and treatment infrastructure.

(a) *Improving fecal sludge treatment in the Grand Nokoué Region*, through: (i) constructing a new FSTP; and (ii) providing on-site semi-collective sanitation solutions,¹ in line with the Urban Sanitation Masterplan’s recommendations.

**Component 3: Project Management, Monitoring and Evaluation.** This component will support project management activities and strengthen the capacity of the MEEM, DA, DNSP and SONEB, through equipment, technical assistance and operating costs, to coordinate and execute project activities at the central and municipal levels, including complying with Bank fiduciary procedures and safeguards, while improving their capacity to engage in dialogue with the community and municipalities, by: (i) financing selected individual consultants, training, a project accounting assistant and consulting firms to ensure efficient project implementation and M&E by the MEEM; (ii) the carrying out of financial audits for the Project; and (iii) supporting sound environmental and social project management, including the preparation of safeguard documents and their monitoring, as well as financing of resettlement compensation, if needed.

**Component 4: Contingent Emergency Response.** This Contingent Emergency Response component will establish an immediate response mechanism to facilitate access to rapid financing for disaster response in the aftermath of a national disaster (floods, droughts or any other emergency) to be triggered through the formal declaration by the Recipient of a national state of emergency (Eligible Crisis or Emergency).

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¹ Semi-collective solutions refer to ones that connect a limited number of households or homogeneous compounds, as opposed to larger scale collective sanitation facilities (public sewerage systems and treatment plants) and to individual on-site sanitation solutions. One pilot is currently testing these solutions in Porto Novo, under the Bank-financed PUGEMU.
Component Name:
Component 1: Scaling-up the Small Town Water Supply Subsidized Concession Model

Comments (optional)

Component Name:
Component 2: Improving FSM in Grand Nokoué urban and peri-urban areas

Comments (optional)

Component Name:
Component 3: Project Management, Monitoring and Evaluation

Comments (optional)

Component Name:
Component 4: Contingent Emergency Response

Comments (optional)

E. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

The Project is country wide in the case of the rural water supply activities (the beneficiary municipalities will be selected with the support of studies and activities financed under an ongoing technical assistance grant), and will be concentrated on the Grand Nokoué Region for the urban and peri-urban sanitation activities (the four municipalities of Cotonou, Porto Novo, Sémé-Kpodji and Abomey-Calavi).

F. Environmental and Social Safeguards Specialists on the Team

Abdoul Wahabi Seini, Africa Eshogba Olojoba, Paivi Koskinen-Lewis

IMPLEMENTATION

Project implementation arrangements will rely on: (i) the oversight of an inter-ministerial steering committee headed by MEEM’s Minister, and (ii) an independent Project Coordination Unit (PCU) within MEEM. The steering committee will provide overall guidance and review of project implementation progress and budgets, and will facilitate the coordination and collaboration between ministries, municipal authorities, and other government agencies involved in project implementation. The PCU will be responsible for overall project...
coordination, for the administrative, fiduciary, environmental and social management and execution of project activities, according to anti-corruption guidelines, and will be supported by three technical thematic groups:

1. **Small Town Water Supply** (Component 1), led by DSPER, with the support of MEEM’s regional WSS offices, as well as in close collaboration with the municipal governments involved to which the responsibilities of procurement and FM for the subsidized concessions are legally devolved. This component also intends to leverage domestic private financing;

2. **Urban Fecal Sludge Management (FSM) – Institutional Strengthening, and Containment, Emptying and Transport** (Components 2.1 and 2.2), technically led by DA, with support from DNSP for social marketing activities related to household-level sanitation in urban and peri-urban areas, as well as in close collaboration with the municipal governments involved;

3. **Urban FSM – Treatment** (Component 2.3), technically led by SONEB, in close collaboration with DA, DNSP and the municipal governments involved.

The PCU will also be responsible for components 3 and 4 and ensure the development of an emergency operations manual for the latter.

Institutional arrangements for the implementation of the ESMF and RPF:

- The PCU will be accountable for the implementation of the project safeguard instruments with the support of the DSPER, DNSP, SONEB and the DA. As such, it shall hire and maintain a specialist in environmental and social safeguards as part of its staff, and will coordinate the resettlement process;

- The Benin Environmental Agency (ABE) will be in charge of monitoring the implementation of environmental measures and will conduct periodic capacity building events (continual training) for municipality staff. This agency will also be in charge of validating resettlement documents and of corresponding periodic monitoring;

- The local private sector shall follow and implement the environmental and social requirements as recommended in the corresponding studies and documents;

- The mayors of beneficiary municipalities shall implement their own policy with regards to environmental and natural resources management in accordance with national laws and policies. The Project will be carried out in municipalities in compliance with the institutional mechanisms which guarantee the participation of their communities.

The PCU’s safeguards specialist will be trained in the World Bank’s safeguard policies’ implementation requirements and the Bank Team’s environmental and social safeguard specialists will provide guidance to the PCU and the MEEM. During project implementation support missions, the Bank Team will assess the implementation of the safeguard documents and recommend additional strengthening, if required. The safeguards documents, along with the requisite attachments, will be shared directly with the involved stakeholders, including ministries (MCVDD, Ministry of Health), as well as concerned private entities and development partners involved with the Project.

**SAFEGUARD POLICIES THAT MIGHT APPLY**

<table>
<thead>
<tr>
<th>Safeguard Policies</th>
<th>Triggered?</th>
<th>Explanation (Optional)</th>
</tr>
</thead>
</table>

Sep 22, 2016
The civil works to be financed under the proposed project entail the expansion, rehabilitation and possible construction of water supply systems (including household connections), as well as a combination of on-site, semi-collective and collective sanitation solutions for urban septage management. The impacts are likely to be small-scale, minor and site-specific, typical of Category B projects. Since the investments and their locations are not known in sufficient detail at this stage, an Environmental and Social Management Framework (ESMF) has been prepared, reviewed, consulted upon, approved, and disclosed in-country and at the Infoshop on August 19 and September 1st, 2016, respectively. Site-specific Environmental and Social Management Plans (ESMPs) will be prepared as and when necessary during the implementation phase and they will be reviewed, consulted upon, approved and disclosed in-country and at the Infoshop prior to the commencement of civil works.

<table>
<thead>
<tr>
<th>Category</th>
<th>Triggers</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Assessment OP/BP 4.01</td>
<td>Yes</td>
<td>The potential project intervention sites will not be within critical habitats or protected ecosystems.</td>
</tr>
<tr>
<td>Natural Habitats OP/BP 4.04</td>
<td>No</td>
<td>This policy is not triggered as the potential project intervention sites will be not be within critical habitats or protected ecosystems.</td>
</tr>
<tr>
<td>Forests OP/BP 4.36</td>
<td>No</td>
<td>This policy is not triggered as the potential project intervention sites will not be within primary forests, are not project activities aimed at enhancing forest quality, and are not introducing sustainable forest management practices to improve ecosystem services.</td>
</tr>
<tr>
<td>Pest Management OP 4.09</td>
<td>No</td>
<td>Pesticides or spraying equipment are unlikely to be procured under the Project. In addition, it is foreseen that project activities will affect the existing pest management practices in the country.</td>
</tr>
<tr>
<td>Physical Cultural Resources OP/BP 4.11</td>
<td>No</td>
<td>Physical, cultural and anthropological resources or artifacts are not foreseen to be available in the potential project sites. Furthermore, no heavy excavations are planned under the Project.</td>
</tr>
<tr>
<td>Indigenous Peoples OP/BP 4.10</td>
<td>No</td>
<td>This policy is not triggered as there are no known indigenous peoples in the project areas.</td>
</tr>
<tr>
<td>Involuntary Resettlement OP/BP 4.12</td>
<td>Yes</td>
<td>Land might be required for the potential construction of new water supply systems and the fecal sludge treatment plant to be financed under the project, and it is possible that during rehabilitation and expansion civil works, minor displacement of people could occur. However, because the exact location of project sites are not known in sufficient detail at this stage,</td>
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</tbody>
</table>

Sep 22, 2016
the Project has prepared a Resettlement Policy Framework (RPF), which was consulted upon, and disclosed in-country and at InfoShop August 19, and September 1st, 2016, respectively. Resettlement Action Plans (RAPs) or Abbreviated RAPs will be prepared as and when necessary during implementation.

| Safety of Dams OP/BP 4.37 | No | The Project does not support the commissioning or construction and/or operations related to dams. |
| Projects on International Waterways OP/BP 7.50 | No | No international waterways or regionally-shared groundwater resources are involved in this Project. |
| Projects in Disputed Areas OP/BP 7.60 | No | The Project and/or the potential sub-project sites will not be located in any disputed areas. |

**KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT**

**A. Summary of Key Safeguard Issues**

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The Project is categorized B because the proposed interventions under the Project (small to medium scale civil works) are not likely to result in significant negative impacts. This is mainly due to the limited scale of the interventions, their dispersed locations, and the nature of the potential impacts, which are easily identifiable, mostly temporary and easily mitigated with known management techniques. No potential significant and irreversible adverse impact, direct or indirect, is expected to occur from project activities, either through the construction or the operation phases.

The proposed civil works, mainly the implementation of components 1 and 2, are likely to result in some land acquisition, restrictions in access to neighborhoods and even homes. Temporary population displacement could also occur during project implementation. To address these impacts, and since the exact locations for the civil works are not known at this point, a Resettlement Policy Framework (RPF) has been prepared. The RPF will guide the preparation of any potential Resettlement Action Plans (RAPs) during project implementation in case any resettlement or losses of assets or access to livelihoods due to involuntary land acquisition should arise. RAPs will be implemented prior to the start of civil works. Positive impacts include health improvements associated with provision of clean drinking water, reduction of diseases related to inadequate disposal of fecal matter, as well as increased security with women benefitting from household water supply connections (as opposed to having to walk certain distances to obtain drinking water).

The impacts and risks that the Client will prevent and monitor over the course of project implementation, including the operation phase will be: (i) minor to moderate biophysical and social impacts (noise, increased dust, increased risk of accident, and loss of vegetation at the borrow pit sites, etc.) during construction; and (ii) foul odors and risk of waterborne disease exacerbation.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:
No potential indirect or long term or cumulative impacts are envisaged during project implementation. The prepared Environmental and Social Management Framework (ESMF) points to the importance of adequately operating and maintaining the fecal sludge treatment plant to be financed under the Project. This is because the receiving environment will be polluted in case the fecal sludge treatment dysfunctions. The site-specific Environmental and Social Management Plan (ESMP) to be prepared during project implementation will contain adequate mitigation measures to address potential impacts.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.

No alternative was found more sustainable.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

The Project’s Environmental and Social Management Framework (ESMF) and Resettlement Policy Framework (RPF) have been prepared, reviewed, approved and disclosed in country on August 19, 2016 and at the Bank Infoshop on September 1st, 2016.

The ESMF provides a screening mechanism for the mainstreaming of environmental and social sustainability aspects from the identification of the subprojects/activities to their implementation phase. Prior to its commencement, as soon as the implementation site is identified, any eligible investment subproject/activity will be processed through the environmental and social screening procedure and then, if eligible, be subject to the preparation and approval of a site-specific Environmental and Social Management Plan (ESMP) and/or Resettlement Action Plan (RAP), prior to its implementation. The screening will be undertaken by the Project Coordination Unit (PCU)’s environmental and social safeguard specialist. This process will result in the environmental classification of the subprojects in category B or C, and category A subprojects will not be eligible for financing.

The RPF outlines the principles and procedures to be followed in the event of land acquisition, impact on assets and/or loss of livelihoods. In case a RAP is necessary, it will be prepared in accordance with the provisions laid out in the RPF and it will be consulted upon and approved with all the stakeholders and then fully implemented before the civil works start.

The PCU will recruit an environmental and social specialist responsible for following up all safeguards issues, and he/she will be benefit from the support of the World Bank Team’s safeguards specialists. Borrower capacity is assessed as good because of the familiarity with Bank safeguards policies, procedures and requirements, and because of its participation in the Benin Emergency Urban Environment Project (PUGEMU) that prepared and implemented about six environmental assessment instruments.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

In terms of Government stakeholders, these include the Ministry of Energy, Water and Mining (MEEM), responsible for: (i) overall project coordination, through a Project Coordination Unit (PCU), including reporting and monitoring of the results framework and of safeguards, quality control of technical aspects of procurement; and (ii) managing Component 1 (Water Supply), with the technical support of its Drinking Water Public Service and Regulation Directorate and municipalities involved, as well as components 3 (Project Management) and 4 (Contingency Emergency Response) of the proposed project; the Ministry of the Living Environment and Sustainable Development (MCVDD)’s Sanitation Directorate (DA), the Ministry of Health’s Public Health Directorate (DNSP) will technically support the management of
components 2.1 and 2.2 (related to the urban fecal sludge management), in close collaboration with the municipalities involved; and SONEB which will technically support the management of component 2.3 (urban sanitation infrastructure), in close collaboration with the DNSP, DA and municipalities involved.

Stakeholder consultations were held with Government agencies as well as direct project beneficiaries as part of the preparation of the ESMF and RPF. Their comments, questions and concerns are outlined in the ESMF and RPF.

B. Disclosure Requirements (N.B. The sections below appear only if corresponding safeguard policy is triggered)

Environmental Assessment/Audit/Management Plan/Other

<table>
<thead>
<tr>
<th>Date of receipt by the Bank</th>
<th>Date of submission to InfoShop</th>
<th>For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors</th>
</tr>
</thead>
<tbody>
<tr>
<td>13-Jul-2016</td>
<td>01-Sep-2016</td>
<td></td>
</tr>
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"In country" Disclosure

Benin

19-Aug-2016

Comments

Newspaper La Nation, vol. 6554.

Resettlement Action Plan/Framework/Policy Process

<table>
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"In country" Disclosure

Benin

01-Sep-2016

Comments

Newspaper La Nation, vol. 6554.

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting) (N.B. The sections below appear only if corresponding safeguard policy is triggered)

OP/BP/GP 4.01 - Environment Assessment

Does the project require a stand-alone EA (including EMP) report?

Yes

If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?

Yes

Are the cost and the accountabilities for the EMP incorporated in the credit/loan?
OP/BP 4.12 - Involuntary Resettlement
Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?
Yes
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?
Yes

The World Bank Policy on Disclosure of Information
Have relevant safeguard policies documents been sent to the World Bank’s Infoshop?
Yes
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?
Yes

All Safeguard Policies
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?
Yes
Have costs related to safeguard policy measures been included in the project cost?
Yes
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?
Yes
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?
Yes

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