Concept Environmental and Social Review Summary
Concept Stage
(ESRS Concept Stage)

Date Prepared/Updated: 02/07/2020 | Report No: ESRSC01109
BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benin</td>
<td>AFRICA</td>
<td>P172247</td>
<td></td>
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<table>
<thead>
<tr>
<th>Project Name</th>
<th>Social Accountability for Nutrition and Early Childhood Services in Benin</th>
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<table>
<thead>
<tr>
<th>Practice Area (Lead)</th>
<th>Financing Instrument</th>
<th>Estimated Appraisal Date</th>
<th>Estimated Board Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Governance</td>
<td>Investment Project Financing</td>
<td>3/31/2020</td>
<td></td>
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<thead>
<tr>
<th>Borrower(s)</th>
<th>Implementing Agency(ies)</th>
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<tbody>
<tr>
<td>Care International Benin/Togo</td>
<td>Care International Benin &amp; Togo</td>
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Proposed Development Objective(s)
To improve transparency, accountability and responsiveness for nutrition and early childhood services for children 0-12 years through collaborative social accountability mechanisms at national, regional and local levels for twelve (12) communes in Benin

<table>
<thead>
<tr>
<th>Financing (in USD Million)</th>
<th>Amount</th>
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<tbody>
<tr>
<td>Total Project Cost</td>
<td>0.50</td>
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B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?
No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]
This project will adopt an inclusive governance programming framework to foster increased collaborative and accountable engagement in the nutrition and child development sector. It is aimed at fostering system-wide change through sustainable multi-stakeholder and multi-level accountability engagement. To this end, through the wider network of partners different stakeholders will be simultaneously mobilized at various levels of the accountability value chain in bringing awareness about nutrition rights and responsibilities; gathering, analyzing and packaging actionable evidence, negotiating for meaningful presence at decision-making tables and completing the feedback loop from the local, through national to global levels and vice versa. The project will identify champions for nutrition at
commune and regional levels to support citizen voices and will have three components: 1. Capacity-building and
developing social accountability tools in nutrition and child health. 2. Strengthening collaborative spaces for improved
solutions to nutrition and child health across civil society-public sector stakeholders. 3: Improving knowledge and
learning on social Accountability.

**D. Environmental and Social Overview**

**D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]**
The geographic scope covers both national and local level and touches up to 8 departments and 12 communes in
Benin: Couffo (Aplahoué Dogbo) Mono (Grand Popo Athiémé) Ouémé (Bonou Dangbo) Plateau (Pobè Ifangny) Zou
(Zangnanado Ouinhi, Zà-kpota and Zogbodomey).

**D. 2. Borrower’s Institutional Capacity**

Benin has an acceptable legal and regulatory environmental and social framework. The National agency called Agence
Beninoise pour l’Environnement (ABE) is the entity that oversees the approval of environmental and social studies,
monitoring and evaluation of such studies, and implementation at the national level. This entity has acceptable
technical capacities but it is under staffed. In addition, with the context of the implementation of the new
environmental and social standards of the ESF, capacity building is nevertheless required to enable this structure to
play its role fully.
CARE International is listed as an implementing agency of the proposed project. This organization has experience in
implementing the nutrition projects and providing early childhood services through collaborative social accountability
mechanisms particularly social education on inclusion, gender-based violence, etc. CARE International-Benin capacity
to fully incorporate the collaborative social accountability mechanisms according to the ESF requirements will be
assessed and appropriate measures provided to address the relevant gaps prior to the appraisal stage. In addition, the
project implementation team should include a social specialist familiar with ESF requirements mainly on social
competencies to enable to lead the implementation of the ESCP (Environmental and Social Commitment Plan), Labor
Management Procedures (LMP) and the SEP (Stakeholders Engagement Plan) that are required to be developed by
the Borrower.

**II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS**

**A. Environmental and Social Risk Classification (ESRC)**

**Environmental Risk Rating**

Most of the project activities are capacity building activities. Based on that, the environmental risk of the project is
deemed low and no specific environmental and social risk and impact assessment is expected to be conducted later.

**Social Risk Rating**

The project social risk classification is rated low at this stage of project preparation. The proposed project aims at
fostering system-wide change through sustainable multi-stakeholder and multi-level accountability engagement. The
planned activities will mainly contribute to building capacity through increased collaborative and accountable
engagement in the nutrition and child development sector for partners and stakeholders in order to raise awareness
for behavioral change. From this perspective, the overall social impacts of the proposed project would be positive.
However, since the project implementation will involve several stakeholders (administrative authorities, technical
services, civil society organizations, community-based organizations, children and their families, etc.) and because the
capacities for managing social risks at national level and within Care International-Benin, within the context of the Environment and Social Framework (ESF) is not clearly known to date, the Bank will carry out an assessment of the Borrower’s capacity to manage social risks related to the social inclusion, vulnerable groups including disabilities, Gender Based and Violence/Sexual Exploitation and Abuse (GBV/SEA), Grievance Redress Mechanism (GRM), citizen engagement, etc. is prior to the project appraisal stage. The social assessment will include an analysis of national legal and policies and the Borrower’s (CARE International Benin) social risk management frame to manage social risks, as per ESF requirements. The assessment will determine relevant mitigation measures will be translated into an action plan to be implemented during the project life-cycle in addition to the expected SEP. The assessment will also determine if the implementing agency will need to recruit a social specialist to implement this action. The Environmental and Social Risks Classification (ESRC) may be revised based on the results of the Bank’s assessment and the result of a preliminary screening for GBV/SEA risks.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:
Given that most of the project activities are capacity building activities, the environmental risk of the project is deemed low and no specific environmental and social risk and impact assessment is expected to be conducted later. However, a social assessment will be conducted by the Bank - analysing national legal and policies and the borrower's social risks management framework – to assess the Borrower’s capacity to manage the project’s social risks related to the social inclusion (vulnerable groups including disabilities), GBV/SEA, GRM, citizen engagement, etc. as per ESF requirements. Relevant mitigation measures will be translated into an action plan to be implemented during the project implementation in addition to the SEP and the LMP prepared prior to appraisal. The borrower will prepare an Environmental and Social Commitment Plan (ESCP). It will include the commitment and the timeline for these mitigation measures and actions including provisions related to GBV/SEA, GRM and the citizen engagement.

Areas where “Use of Borrower Framework” is being considered:
This project will not use the Borrower’s E&S Framework in the assessment, development and implementation of investments. However, it will comply with relevant national legal and regulatory requirements.

ESS10 Stakeholder Engagement and Information Disclosure

From the preliminary assessment, the stakeholders include: Ministries in charge of Agriculture, Health, Social Protection, Development, Finance, Decentralization, Trade, as well as professional Organizations, Food Industries Association, National Association of Municipalities, research and training institutions and civil society.

A Stakeholder Engagement Plan (SEP) will be developed and disclosed. This plan will address specific risks identified by the key stakeholder groups (administrative authorities, technical services, civil society organizations, community-based organizations, etc.) and will be updated as and when necessary. It will include an overview of project stakeholders and establish a systematic approach for engaging stakeholders, maintaining a constructive relationship with them, take into account stakeholders’ views, promote and provide means for effective and inclusive engagement throughout the project life-cycle, and ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner. The SEP will also include a grievance
mechanism to handle any complaints in the context of the project. The GRM will address any identified GBV/SEA risks and the need to be accessible to a wide diversity of stakeholder groups.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

Through the Project Implementation Unit (CARE International Benin), the project will include direct workers. The borrower will need to meet requirements described in the ESS2 for terms and conditions of employment, non-discrimination and equal opportunity, freedom of association, prevention of child labor and forced labor, a grievance mechanism etc. Civil servants working in connection with the project full-time or part-time will remain subject to the terms and conditions of their existing public-sector employment or agreement, unless there has been an effective legal transfer of their employment or engagement in the project. The project will also include a grievance mechanism for labor disputes. No risks of forced labor and working conditions are envisaged. Labor Management Procedures (LMP) will be prepared according to the national laws and regulations and ESS2 requirements, and establish strong guidelines to avoid any child employment.

ESS3 Resource Efficiency and Pollution Prevention and Management

The proposed project is not expected to generate any pollution to air, water or land. Hence, potential environmental risks and impacts associated with ESS3 is not relevant at this stage. However, relevance of ESS3 will be further reviewed assessed during project preparation as part of the environmental and social assessment process.

ESS4 Community Health and Safety

The project is not expected to adversely affect local communities’ health or safety as the project will not finance any civil works. However, as the project will involve several stakeholder groups, the Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) risk of the project will be assessed. A GBV action plan will define proportional mitigation measures, including information, communication and capacity building activities to disseminate information related to project’s GBV/SEA risks, advocated mitigation measures and the question and response services available to victims. It will establish a survivor-centered response protocol to ensure that project’s GBV incidents are properly reported and that all survivors reporting a GBV incident receive timely access to available package of services, including health, psycho-social, and legal support. The project’s GRM will include provisions to safely and ethically register, GBV-related complaints and allegations.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The planned activities of the proposed project are not expected to involve land acquisition leading to involuntary resettlement.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
This ESS is not relevant as activities supported by the project do not constitute a threat neither for the biodiversity conservation nor the sustainable management of living natural resources. The proposed project is not expected to involve primary production and/or harvesting of living natural resources.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
There are no Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the project area.

ESS8 Cultural Heritage
This ESS is not relevant as the project is not financing activities that might impact cultural heritage.

ESS9 Financial Intermediaries
This standard is not relevant.

C. Legal Operational Policies that Apply

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<tr>
<th></th>
<th>OP 7.50 Projects on International Waterways</th>
<th>No</th>
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<tr>
<td></td>
<td>The project activities will not impact any international waterways</td>
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| | OP 7.60 Projects in Disputed Areas | No |
| | There is any disputed area in the project location |

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? 
No
Financing Partners
N/A

B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:
-Preparation and disclosure of the Environmental and Social Commitment Plan (ESCP) including a Labor Management Procedures (LMP);
-Preparation and disclosure of the Stakeholder Engagement Plan (SEP).

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):
Implementation of the SEP including a Grievance Redress Mechanism;
Implementation of the Labor Management Procedures;
Preparation and implementation of the GBV/SEA action plan;
Preparation and implementation of possible social risks management plans.

**C. Timing**

Tentative target date for preparing the Appraisal Stage ESRS: 29-Feb-2020

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<th>World Bank</th>
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<tr>
<td><strong>Contact:</strong> Hirut Johnson</td>
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<td><strong>Title:</strong> Leadership Development Specialist</td>
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<td><strong>Telephone No:</strong> 458-8791</td>
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**V. FOR MORE INFORMATION CONTACT**

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Telephone: (202) 473-1000  
Web: http://www.worldbank.org/projects

**VI. APPROVAL**

<table>
<thead>
<tr>
<th>Task Team Leader(s):</th>
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<tbody>
<tr>
<td>Hirut Johnson</td>
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<tr>
<th>Practice Manager (ENR/Social)</th>
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<tbody>
<tr>
<td>Aly Zulficar Rahim Recommended on 07-Feb-2020 at 14:03:11 EST</td>
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