

Luxembourg, 18 October 2023

Environmental and Social Data Sheet

General information

Project name:	<i>ASSAINISSEMENT PLUVIAL DE VILLES DU BENIN II</i>
Project number:	<i>2022-0950</i>
Country:	<i>Benin</i>
Project description:	<i>Rainwater drainage infrastructure targeting several secondary cities of the country. EIB financing will cover 3 cities in the North of the country, Natitingou, Djougou and Kandi.</i>
EIA required:	Yes <i>Under national legislation, an environmental and social impact assessment is required for each beneficiary city of the project.</i>
Project part of the “carbon footprint” programme ¹ :	No

Environmental and social impact assessment

Environmental impact assessment

The purpose of this operation is to partially finance the second phase of the Stormwater Management Project for Secondary Cities (PAPVS). The government of Benin has incorporated this project into its Building Resilient and Inclusive Cities (BRIC) programme, with the aim of making the beneficiary towns and cities inclusive and climate resilient. The programme is split into three components:

- Component 1: *Central investments with a structural impact on stormwater drainage.* This component corresponds to PAPVS 2.
- Component 2: *Climate-resilient municipal investments.* These investments supplement the drainage works and are made by the beneficiary municipalities.
- Component 3: *Strengthening the technical and material capabilities of the beneficiary municipalities.* This component involves purchasing materials and equipment as well as providing training and support.

The programme therefore includes the investments planned for the beneficiary towns and cities under PAPVS 2. These cover the rehabilitation and extension of existing drainage infrastructure, the construction of new infrastructure (drains and associated works) and paving of the roads alongside the planned drains, including kerbs and lateral gutters. The Ministry of the Living Environment and Sustainable Development will carry out these investments directly through the road infrastructure and land-use planning association, Société des infrastructures routières et de l'aménagement du territoire (SIRAT), as the delegated contracting authority. SIRAT will be in charge of carrying out the project, in particular supervising the works and ensuring that environmental and social measures are effectively implemented. The beneficiary towns and cities are Allada, Aplahoué, Dassa-Zoumé, Djougou, Kandi, Lokossa, Pobè and Natitingou. The EIB will finance stormwater drainage works in Kandi, Djougou and Natitingou.

¹ Only projects that fall within the scope of the pilot programme, according to the definition provided in the EIB's methodology for assessing the carbon footprint, are selected and only on the condition that estimated emissions exceed the thresholds set out in the methodology, namely more than 20 000 tonnes of CO₂e per year in absolute (gross) terms or 20 000 tonnes of CO₂e per year in relative (net) terms — both for increases and savings.



Luxembourg, 18 October 2023

Benin is highly vulnerable to flooding and to the effects of climate change, in particular in the towns and cities selected for financing. These areas are also facing severe demographic pressure and contending with limited resources, leading to poorly controlled urbanisation. As a result, there is no control over the occupation of land, with communities sprouting up in areas prone to flooding and in natural drainage corridors and outlets. A large proportion of households in the areas most vulnerable to flooding are economically disadvantaged and do not have the means to mitigate the potential risks. In addition, the existing drainage systems are either insufficient or incomplete and do not provide effective drainage of cities' water catchment areas. The increasingly frequent and intense flooding caused by climate change therefore poses a wide range of economic, social, environmental and public health problems. Floods cause significant damage to homes, buildings, public facilities and urban roads, as well as economic disruption and destruction that can lead to loss of life. In addition, stagnant water can lead to diseases caused by consuming contaminated food or water (cholera, typhoid, etc.) and is a breeding ground for vectors of other diseases, in particular mosquitoes (malaria, etc.).

Under this project, drainage infrastructure will be built and upgraded to improve stormwater drainage and make towns and cities less vulnerable to the risks of flooding and more resilient to the effects of climate change. Given the nature and urban location of the project, the promoter expects its activities to have little negative impact on biodiversity, cultural resources or wildlife. No protected areas will be affected. The negative impacts of the project will mainly occur during the construction phase, such as noise pollution, traffic disruption, ground contamination by hydrocarbon products, and environmental degradation caused by waste production, etc. These negative impacts are unlikely to have a significant and lasting effect on the biophysical and human environment in the project's area of influence. However, environmental and social impact assessments are under way to draw up an environmental and social management plan, including measures to mitigate these impacts and to make the project more environmentally sustainable. The implementation of these environmental and social management plans (a plan will be prepared for each city) will ensure that the project is integrated into its environment.

From a legal perspective, several decrees and laws are applicable to this project, most notably: Decree No 2017-332 on strategic environmental assessments and their scope of application; Law No 98-030 of 12 February 1999 on the framework law on the environment in the Republic of Benin; Law No 97-029 of 15 January 1999 on the organisation of towns and cities in the Republic of Benin; the law governing the public health code, supplemented by its implementing Decree No 097-616 of 18 December 1987 governing the public health code, etc. In the European Union, the project would come under Annex II to Directive 2014/52/EU amending Directive 2011/92/EU on the environmental impact assessment of projects.

According to the general environmental impact assessment guide published by the Benin Environment Agency (ABE), this project comes under the category "**urban development**", type XV.5 "**urban development works**". For this category of project, the guide recommends carrying out a simplified environmental and social impact assessment. However, given the scale of the works (the length and width of the channels and roadways to be built), the number of people likely to be affected by the project and the requirements of the World Bank's and the EIB's environmental and social policies, detailed environmental and social impact assessments must be carried out for each city's infrastructure project. The cities set to receive financing are subject to the environmental and social policies and standards of each lender.

Environmental and social impact assessments are ongoing for the cities of Djougou and Kandi. The environmental impact assessment report for Natitingou is already available. The African Development Bank's environmental and social standards were applied for this assessment, which it oversaw and financed during the previous phase of the Stormwater Management Project for Secondary Cities. Although the competent authority has already issued an environmental permit for the works in Natitingou, the environmental and social impact assessment will be reviewed to ensure that it complies with EIB standards and the report will be published on the Bank's website.



Luxembourg, 18 October 2023

Counterparty alignment with the PATH framework:

Counterparty screened out.

Social impact assessment, where applicable

Despite the positive impact the project will have on living conditions, it is likely to require the temporary or even permanent displacement of people, and lead to economic disruption, including loss of income or even loss of access to resources. A resettlement action plan will be drawn up for each beneficiary city. This plan will be reviewed by each lender to ensure that it complies with their respective standards. It will set out the methodology for identifying project-affected people, as well as the assessment and compensation measures for affected properties, the number and type of properties affected, the complaint procedures, the cut-off dates and the compensation amounts. A Resettlement Monitoring Committee and a complaints mechanism will be set up in consultation and with the participation of the relevant groups to deal with compensation and resettlement matters, and to handle complaints.

Benin has ratified 31 International Labour Organization (ILO) conventions, 26 of which are applied. The eight fundamental conventions have been ratified. Under the environmental and social management plans, the applicable national requirements relating to the management of the environmental and social aspects of the work and the best practices of the ILO and international law will be included in the tender documents and subsequent agreements concluded with the companies selected to carry out the work. The tender documents will also stipulate compliance with principles of equal treatment and non-discrimination in employment and in the workplace, and preventing gender-based violence, including sexual harassment and abuse at work.

Public consultation and stakeholder engagement, where applicable

Public consultations will be carried out as part of the ongoing environmental and social impact assessments and resettlement action plans in the form of participatory surveys and public hearings. In each of the districts hosting the works, the surveys will involve neighbourhood chiefs and councillors, district chiefs, local residents, technical services staff at the town hall and the Departmental Directorate for the Living Environment and Sustainable Development, the representatives of development associations, women, young people and NGOs. Public hearings provide an opportunity to engage with the local community and to present the project, raise various concerns (compensation, disruption of business activities, etc.) and set up the resettlement monitoring committees. This gives local communities the chance to be involved in and influence the project.

A complaints mechanism has also been set up, split into three levels: (1) Local Management and Monitoring Committees (CLGS) in the beneficiary districts, chaired by the district chiefs; (2) the Technical Resettlement Committee (CTR) at the town hall, chaired by the mayor or a representative; (3) the National Complaints Management Committee (CNGP), which will be set up at SIRAT's project headquarters. This mechanism will operate during project implementation.

Other environmental and social aspects

Once the ongoing environmental and social impact assessments are complete, the contracting authority will be able to use the environmental and social management plan and resettlement action plan to monitor whether measures to mitigate negative environmental and social impacts are being effectively implemented, and to maximise the positive impact. SIRAT plans to set up a team within the project management unit tasked with the effective handling of environmental and social matters, in particular compensation. This team will ensure that national



Luxembourg, 18 October 2023

environmental and social standards are complied with during the works, that mitigation measures are implemented and that the commitments of each stakeholder are upheld.

Its previous experience with stormwater management projects has enabled it to develop good organisational, managerial and institutional capabilities for dealing with social communication, gender and compensation issues.

Conclusions and recommendations

This operation will finance the construction, rehabilitation and extension of structural stormwater drainage infrastructure. This will substantially improve stormwater drainage and limit flooding in the beneficiary towns and cities. As a result, the project will have a positive impact on the living conditions of the most disadvantaged groups, especially women raising children alone.

It is also likely to have negative environmental and social impacts. The environmental and social impact assessment and resettlement action plan containing measures to mitigate these impacts are ongoing. To this end, the following conditions will be included in the finance contract:

- The environmental and social impact assessment, including the environmental and social management plans and resettlement action plans for the infrastructure covered by the disbursement, have been finalised and have received a permit from the competent environmental authority, with terms deemed satisfactory by the Bank and set to be published on the Bank's website.
- The people affected by the components covered by the disbursement have been compensated to the Bank's satisfaction.

In light of the various activities associated with the project, the operation has been deemed to be environmentally and socially acceptable to the Bank, which is therefore in favour of its financing.