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**Environmental and Social Impact Study of the Design and Construction Project of the  
SOFITEL Hotel and the Renovation of the International Conference Center (CIC)**

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**Stakeholder engagement plan**



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## 1. Objectives of the Stakeholder Engagement Plan

This report constitutes the Stakeholder Engagement Plan for the design and construction of the SOFITEL Hotel and the renovation of the International Conference Center (CIC).

The Stakeholder Engagement Plan (PEPP) makes it possible to propose to the promoter (MCVDD) a stakeholder engagement strategy at the various stages of the project life cycle. It is an essential tool in managing communications with stakeholders that helps ensure that the project obtains and maintains broad community support. The PEPP will also guide the procedures for handling complaints and claims.

Indeed, the PEPP takes into account the socio-economic and cultural characteristics in the project area in order to create an atmosphere of understanding and trust, and allows to actively involve the people affected by the project and other parties. stakeholders, providing these groups with sufficient opportunity to voice their opinions and concerns about the project.

It is a dynamic document where the engagement and communication actions must be reviewed and updated according to the results obtained during the implementation of the various actions of the plan and the priorities and important events in the life of the project. This Stakeholder Engagement Plan focuses on the stakeholders directly affected by the project, and in particular the users of the project site and the inhabitants of the CEN SAD villas at the airport.

## 2. Organization of the report

The Stakeholder Engagement Plan is structured as follows:

- Objectives of the Stakeholder Engagement Plan
- Organization of the report
- Description of projects and associated environmental and social risks;
- Laws, regulations, international standards and good practices that will guide the execution of the PEPP;
- Overview of previous engagement activities;
- Identification of stakeholders;
- Stakeholder dialogue program;
- Summary of engagement activities;
- Resources required and responsibilities of personnel responsible for managing the execution of the PEPP;
- Complaints management mechanism;

## 3. Description of projects and associated environmental and social risks; 3.1

### Description of the project

See section 7 of the project's ESIA report.

### 3.2 Main environmental and social risks

These various environmental and social risks have been presented in sub-sections 3 and 4 of the “DANGER STUDY” section in the APPENDIX part of the ESIA.

## 4. Regulatory laws, international standards and good practices that will guide the execution of the PEPP

### 4.1. National legal framework

See section 4 of the project's ESIA report.

### 4.2. IFC Performance Standards

In 2012, IFC published a series of eight performance standards that became an international benchmark for the social and environmental assessment process in which IFC and other international donors got involved.

The current interpretation of the Ministry of the Living Environment and Sustainable Development (MCVDD) through the Agence du Cadre de Vie pour le Développement du Territoire on the performance standards of the IFC is that standard 5 on land acquisition and involuntary resettlement and Indigenous Peoples Standard 7 are not applicable for this project.

The criteria for the other six standards applicable to the Program are as follows:

- **NP1: Assessment and management of environmental and social risks and impacts**
  - Identify and assess environmental and social risks, including differentiated risks and impacts: men / women; vulnerable groups;
  - Ensure the informed participation of women and vulnerable groups;
  - Avoid, minimize, repair or compensate for negative impacts;
  - Ensure that affected communities and other stakeholders are engaged in the management of issues that affect them; Ensure that complaints from affected communities and external communications from other stakeholders are answered and are handled appropriately;
  - Improve environmental performance through an efficient management system.
  
- **NP2: Labor and working conditions**
  - Promote fair treatment, non-discrimination and equal opportunities for workers;
  - Promote safe and healthy working conditions and protect workers' health (which takes into account the risks inherent in the sectors of activity and the particular dangers faced by women);
  - Establish, maintain and improve relations between workers and management;
  - Promote respect for national labor and employment law;
  - Promote safe and healthy working conditions and protect workers' health;
  - Do not resort to forced labor.

- **NP3: Rational use of resources and pollution prevention**
  - Avoid or reduce negative impacts on human health and the environment by avoiding or reducing pollution generated by project activities;
  - Promote the more sustainable use of resources, especially energy and water;
  - Reduce GHG emissions related to projects.
  
- **NP4: Community health, safety and security**
  - Anticipate and avoid, during the life of the project, negative impacts on the health and safety of affected communities;
  - Identify and manage the various risks and impacts affecting women and men, girls and boys, as well as vulnerable populations in terms of safety and health;
  - Ensure that the protection of people and property is ensured in accordance with applicable human rights principles and in a manner that avoids exposing affected communities to or minimizes risks.
  
- **NP6: Conservation of biodiversity and sustainable management of living natural resources**
  - Protect and conserve biodiversity;
  - Maintain the benefits derived from ecosystem services;
  - Promote the sustainable management of living natural resources through the adoption of practices that integrate conservation needs and development priorities.
  
- **NP8: Cultural heritage**
  - Protect cultural heritage from negative repercussions of project activities and support its preservation;
  - Promote the equitable sharing of the benefits of the use of cultural heritage.

According to IFC standards, the promoter of a project must, in terms of engagement with stakeholders, adopt criteria and indicators of good practice in a manner commensurate with the risks and impacts of the project. These criteria and indicators concern information, identification and analysis, consultation and involvement of stakeholders. They include:

### **Inform**

- Disclosure of meaningful information in a timely manner, particularly on the impacts of the project before consultations.
- Disclosure of concrete information in a format and language understood and adapted to the needs of stakeholders.
- Update information on changes to the project and the evolution of its design to stakeholders.

## **Identify and analyze**

- Systematic analysis and identification of project stakeholders and their interests ;
- Study of regulatory and financial requirements for stakeholder participation in projects.

## **Consult and involve**

- Process that allows stakeholders to express their points of view and take into account their expectations and concerns.
- Taking into account the suggestions of stakeholders on the way in which they wish to be consulted.
- Respect for local traditions, languages, turnaround times and decision-making processes.
- Involvement of stakeholders in the phase of establishing the scope of the evaluation of the various studies.
- Involvement of stakeholders in the monitoring of the project.
- Negotiation of agreements or partnerships, in particular short-term partnerships before investment decisions.
- Use of consultations to improve mitigation and compensation agreements.
- Documentation of the consultation process and results.
- Organization of additional visits before the consultation if this could become a source of complaints.

## **Manage, measure and track relationships**

- Internal management of the engagement process with stakeholders through the project's Environmental, Social, Health and Safety Management System (SGESSS) and the preparation of a dialogue plan that takes into account the impacts of the project.
- Reporting to stakeholders.
- Continued involvement during consultations organized by the government.
- Measure of the level of support provided by stakeholders to the project.
- Establishment of a complaints management mechanism.
- Monitoring of the work of the various project stakeholders, in particular the ESIA consultants.

## **5. Overview of previous engagement activities**

As part of the environmental and social assessment of this project, several engagement activities with stakeholders internal and external to the project were carried out under the responsibility of the Be Green stakeholder engagement specialist, the firm in charge. of carrying out the ESIA

These activities were recorded in section 12 as well as in the minutes in the APPENDIX of the project ESIA report.

## 6. Stakeholder mapping 6.1

### Identification of stakeholders

Identifying stakeholders is the first step in any engagement process and dialogue within the framework of the development of new projects.

A project leader must imperatively identify all the actors, organizations and groups of individuals who could be directly concerned or interested in his project. He must also understand their positioning, their expectations and their fears in order to identify what could represent an opportunity or a threat for the project. The promoter will thus be able to distinguish the stakeholders who can facilitate the project and whose membership is required from those who can block it and require strategic engagement actions (consultation, mediation, etc.).

The identification of stakeholders will therefore guide the entire engagement strategy to be deployed to ensure the success of the project.

Several criteria were used to make this identification:

- the nature of the project activities;
- its location and areas of influence, i.e. the geographic areas in which the project is likely to cause impacts;
- the nature of any impacts, and therefore, the groups of individuals, governmental or non-governmental institutions that may be affected by the project or have an interest in the site and / or in the project;
- the interests and expectations of stakeholders expressed during meetings and interviews conducted for the ESIA.

The list of stakeholders presented below was established on the basis of current knowledge of the project, of its actors and thanks to the numerous field visits carried out within the framework of the ESIA. It can be updated periodically, because the identification of stakeholders will be done continuously throughout the project.

The project stakeholders were also classified into three main categories:

- the stakeholders involved in the implementation of the project and who by their roles and responsibilities are actors in the project, from construction to operation;
- stakeholders affected by the project, ie people or institutions who are "affected" by one of the potentially negative impacts of the project or who could directly benefit from one of its benefits;
- stakeholders interested in the project, which include people, groups or public agencies who may have an interest in the project, and therefore concerned by the procedures involved in the project.

### 6.2. Stakeholders involved in the implementation of the project

Many stakeholders will be involved continuously or sporadically in the implementation of the project, whether through the issuance of permits or authorizations or the environmental and social monitoring of the project during the construction and then operation phase.

These stakeholders are essential because their actions condition the smooth running of the project and good management of environmental and social impacts.

They mainly belong to the following groups:

- the ministries in charge of the development of the various stages of the project and the establishment of its main components (land tenure by freeing up rights-of-way, supply of water and electricity, etc.);
- government institutions, including the directorates, agencies, institutes and decentralized services of the territorial administration which will intervene at different levels and according to different timetables to support the implementation of the project through their expertise. This category includes institutions that promote agriculture, stockbreeding and fishing, protection and control of the use of natural resources (fauna, flora), land management, construction infrastructure, environmental protection, industrialization, energy, water, community health and safety, human well-being, social protection and employment, etc.

The table below presents these stakeholders.

Stakeholders	Nature of Interest in the project / description of the role
Promoter:  Ministry of the Living Environment and Sustainable Development (MCVDD)	<ul style="list-style-type: none"> <li>- Implement the Environmental and Social Management Plan (ESMP) and the PEPP</li> <li>- Inform all stakeholders affected by the project</li> <li>- Ensure compliance with commitments made in relation to stakeholders</li> <li>- Ensure that the needs and interests of the populations are taken care of to facilitate the acceptance of the project</li> <li>- Ensure the transparency of the process</li> <li>- Set up the complaints management mechanism</li> </ul>
Beninese Environment Agency (ABE)	<ul style="list-style-type: none"> <li>- Analyze and approve the EIA report and propose to the Minister in charge of the Environment the technical opinion on the environmental acceptability of the project which is sanctioned by the issuance of an environmental compliance certificate signed by the said Minister to the project promoter</li> <li>- Follow the ESMP</li> <li>- Control and prevent pollution and nuisances</li> <li>- Inform and sensitize the populations concerned about the environmental assessment procedure</li> <li>- Monitor risk management related to the project</li> <li>- Deal with complaints sent to it</li> <li>- Organize external audits and environmental inspections</li> </ul>
Departmental Directorate of Infrastructure and Transport	<ul style="list-style-type: none"> <li>- Monitor and control the application of standards and laws and regulations in the field of transport and infrastructure</li> <li>- Manage the road network under its territorial jurisdiction and carry out maintenance work</li> <li>- Issue and control tickets</li> </ul>
National Center of Road Safety (CNSR)	<ul style="list-style-type: none"> <li>- Carry out automotive technical checks</li> <li>- Promote information and awareness of road users</li> </ul>

Stakeholders	Nature of Interest in the project / description of the role
Executive management of Job Departmental Direction of Work and the Public service	- Promote occupational health, social dialogue in the workplace, social security in all sectors of activity, the fight against child labor
Inspection Services Work level departmental	- Conduct labor inspections on the project site and at the industrial zone level once its operation has started
National Fund of Social Security (CNSS)	- Protect salaried workers from occupational risks, work accidents and occupational diseases - Organize animation sessions in companies for workers on the risk factors inherent in their sector of activity - Organize periodic or unannounced visits to monitor compliance with safety rules in the workplace
National Company of Waters of Benin (SONEB)	- Deployment of the water supply system on the project site - Supply of water and receipt of payments
Beninese society energy electric (SBEE)	- Deployment of the electricity supply system on the project site - Supply of electricity and receipt of payments
Republican Police National Group of Firefighter	- Ensure the safety of people and property on the project site - Implement emergency plans on the project site
Departmental Directorate of Health of the Atlantic / Coastal Information Center, Foresight and of Advice (CIPEC)	- Prevent and monitor occupational diseases - Prevent and monitor other diseases and the spread of COVID-19, STIs / HIV AIDS

### 6.3. Stakeholders affected by the project

This category of stakeholders includes people, groups and entities in the project area who are directly impacted (positively or negatively) by the project.

In the case of this project, several groups can be distinguished:

- residents of CEN SAD villas, outlying neighborhoods benefiting from jobs on the project site, as well as entrepreneurs and traders (on the sly);
- workers and employees on the project site from municipalities other than those of Cotonou;
- migrants attracted to the project in the hope of obtaining a job before the work begins. This group could be made up of people of Beninese nationality or not from other regions of the country, in particular unemployed young people attracted by the prospect of a job.

It is also particularly important to identify people and groups who may have more difficulty in participating and those who may be unevenly or disproportionately affected by the project, due to their marginalized or vulnerable situation.

For these groups, different or distinct forms of mobilization should be considered. The project must propose the implementation, if necessary, of differentiated measures so that these people or groups are not disproportionately affected by the negative impacts of the project and are not disadvantaged.

Managing vulnerable people may also require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

The concept of vulnerability can be approached from different angles depending on the context. In the context of the SOFITEL Hotel design and construction project and the renovation of the International Conference Center, vulnerability refers to the difficulties that some people affected by a project (PAP) may encounter in:

- adapt to the changes induced by the project;
- take full advantage of the benefits of the project (in particular the jobs offered);
- find conditions and / or a standard of living equivalent or superior to what existed before the project.

There is a whole range of policy instruments to address the specific needs of vulnerable groups, including:

- the establishment of job quotas or financial incentives for the employment of people belonging to vulnerable groups;
- promoting gender equality in access to employment through quota systems or financial incentives;
- protection of the rights of women working for the project against sexual harassment and violence at work by setting up internal structures within the human resources department.

#### 6.4. Stakeholders interested in the project

This category of stakeholders includes individuals, groups or entities who may not directly feel the impacts of the project, but who consider or perceive their interests as being affected by the project and / or who could affect the project and its process. implemented one way or another.

The promoter may have to interact with these stakeholders in order to obtain information, coordinate the management of certain impacts or recruit them as sub-contractors for the project.

Interested stakeholders include in particular:

- construction companies, suppliers of services, goods and materials that will be involved or interested in the construction site;
- trade unions and socio-professional organizations (General Confederation of Workers of Benin, National Union of Workers' Unions of Benin,

Confederation of Autonomous Trade Unions of Benin) which could intervene in the defense of workers' rights through trade union actions;

- civil society organizations that could commit to defending the interests of the communities affected by the project or that can become MCVDD partners in the realization of the Project in order to get involved in the organization and implementation of mediations social, in the dispute management process, support the implementation of the stakeholder engagement plan or intervene in awareness-raising activities on themes such as COVID, STI / AIDS;
- the client, future investors and those likely to become potential partners in the project;
- the media and associated interest groups, including the spoken, written and audiovisual media: local and national radio stations, local and national television channels, print or web press;
- donors who might be interested in financing the project.

## 7. Stakeholder dialogue program

The Stakeholder Dialogue Program concerns the only project in question.

The stakeholder dialogue program includes a program implementation strategy, information and key messages to be disseminated, means of engagement adapted to the type of engagement with stakeholders, information and communication tools. , the identification of engagement opportunities for local stakeholders as well as a protocol to promote the participation of women and vulnerable groups.

### 7.1. Implementation Strategy of the Dialogue Program

The strategy for implementing the stakeholder dialogue program is based on four main pillars:

- 1- Intensive communication and promotion campaign;
- 2- Coordination between internal Compact stakeholders;
- 3- Participation and support of key stakeholders at the local level;
- 4- Systematic and rapid follow-up with stakeholders.

#### 7.1.1. Intensive communication and promotion campaign

The Ministry of the Living Environment and Sustainable Development (MCVDD) has adopted a communication strategy that aims to promote its actions and project a positive image of the project among both internal and external stakeholders. The objective of this communication strategy is to get stakeholders to adhere to the objectives of the project.

It is about making accessible and highlighting the positive aspects of the project, in particular:

- build a hotel complex that meets the comfort of a specific category of clientele;
- increase the reception capacity of the Benin Marina Hotel;
- increase the reception and accommodation capacity of the economic capital of Benin;
- contribute to increasing Cotonou's hotel performance;
- improve state resources through taxes and levies;

- to strengthen the economic profitability of its activities;
- conquer a new clientele with specific comfort needs.

The means of communication and promotion as well as the content of the messages are adapted to the various stakeholders of the Program: internal stakeholders, Beninese authorities, affected communities and populations, and civil society organizations and NGOs.

### 7.2. Information to share with stakeholders

Ministry of the Living Environment and Sustainable Development (MCVDD) ensures that all representatives and partners of the project share the same messages and disseminate the same information. Thus, “key messages” were developed in response to frequently asked questions by stakeholders.

These messages were updated in light of the questions asked during the engagement activities held during the consultation of project stakeholders.

The information and messages to be shared with stakeholders vary according to the start-up, construction and closure phases. The table shows the type of information that is or will be shared according to the different phases of the project.

Phases	Types of Information
Planning and studies	<p>ALL STUDIES</p> <ul style="list-style-type: none"> <li>• Overall objectives and goals of the project;</li> <li>• Project activities;</li> <li>• Overall implementation schedule;</li> <li>• Social, environmental and health and safety impacts of the project, impact mitigation and improvement measures and management plans;</li> <li>• Challenges related to gender and social inclusion;</li> <li>• IFC Performance Standards;</li> <li>• Mechanism put in place to address concerns and handle complaints.</li> </ul>
Construction	<ul style="list-style-type: none"> <li>• Overall objectives and goals of the project;</li> <li>• Project activities;</li> <li>• Purpose and nature of the activities to be carried out;</li> <li>• Start date of the works and duration;</li> <li>• Potential impacts;</li> <li>• Avoidance, mitigation, adaptation and mitigation measures;</li> <li>• Information on who to contact in case of questions / complaints relating to the <ul style="list-style-type: none"> <li>• project manager ;</li> <li>• Means and tools of contact;</li> <li>• Mechanism put in place to address concerns and handle complaints.</li> </ul> </li> </ul>
Closing	<ul style="list-style-type: none"> <li>• List of stakeholders established at each phase;</li> <li>• Acquired from the project;</li> <li>• Mechanism for continuing dialogue with stakeholders after the project;</li> <li>• Good practices and attitudes for taking charge of the achievements of the project;</li> </ul>

	<ul style="list-style-type: none"> <li>• Mechanism put in place to address concerns and handle complaints.</li> </ul>
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Before organizing activities that involve the disclosure of information, those responsible for disseminating information to stakeholders are trained in good practices in this area.

The information disclosed must be concrete and supported by facts. It should not raise unnecessary expectations and cast doubt on promises that may not be fulfilled.

The aim is to make the information as accessible as possible and on time.

### 7.3. Methods of dialogue with stakeholders

The dialogue methods used within the framework of this project are adapted to each of the stakeholder groups according to the engagement strategy employed (information, consultation or involvement). Dialogue methods used in the project include

- face-to-face coordination meetings;
- training and workshops;
- site visits and audits;
- information and consultation meetings;
- public meetings with the people affected by the projects and the neighboring populations;
- sending letters, emails, SMS or WhatsApp or telephone communications;

## 8. Summary of engagement activities

### 8.1. Activities carried out

As part of carrying out the initial state of the natural and human environment for the Environmental and Social Impact Study, Be Green, carried out consultations with the various stakeholders concerned by the project.

These meetings were held in order to collect technical, environmental and social data on the project area as well as to inform the stakeholders concerned and to collect their opinions.

The table below presents the list of stakeholders met during the consultations

No.	Last name	First names	Age	Sex	Profession	Phone
1	GUEDOU	Wilfried	33	M	Security agent	97528823
2	DOSSOU	Achille	35	M	Security agent	96016731
3	DANSI DAGA	David	28	M	Diplomat	67082771
4	SONON	Irene	42	M	Driver	95602406
5	ADANTO	Married	53	F	Housekeeper at Novotel	95052352
6	ALIHONOU	Flora	34	F	Security agent	61010062
7	TCHEKESSI	Yabo	37	F	Meal saleswoman	

8	COOVI	Christine	37	F	Meal saleswoman	
9	GOOD YEAR	Crespin	32	M	Dealer	97094020
10	HOUNZANJI	David	30	M	Student	97526047
11	ANAGONOU	Dominica	58	M	Landscaper	97082939
12	NOUKPECOU	Mathieu	42	M	Landscaper	97487870
13	KPEHOUNTON	Sylvain	42	M	Gardener	67273983
14	DOVI	Gerard	54	M	Printer	97270638
15	AZINKPONON	Bernard	42	M	Student	95306497
16	KASSA	Boris	23	M	Driver	60319054
17	GLIKOU	Nestor	39	M	Immovable	95964237
18	HOUNSA	Francois	30	M	Building painter	
19	ABE	Glue		M	Building painter	
20	TCHIBOZO		49	M	Gas station attendant	64352819
21	ATINOOU	Love	27	M	Gas station attendant	
22	TAIGBA	Rony	24	M	Reseller	60842982
23	GADABO	Affi	19	F	Driver	
24	DAZOGBO	Welcome	37	M	Civil engineer	95375482
25	AKPANOU	Samuel	25	M	Carpenter	63372468
26	GBAGUIDI	Romeo	33	M	Furniture manager	
27	AWOKOU	Hermann	26	M	Reseller	66069806
28	SOSSA	Roman	18	F	Reseller	
29	AMOUSSOUGA	Jacqueline	43	F	Reseller	97203815
30	AMOUSSOUGA	Martine	40	F	Vulcanizer	64312006
31	NOUGBEYE	Eric		M	Seamstress	62785822
32	DESSEMENOU	Christine	21	F	Vehicle rental	67336396
33	DEGBE	Kossivi	50	M	Vehicle rental	94554810
34	DOMAGO	Severin	54	M	Paramedic	97880893
35	SOUROU	Koumolou	55	M	Maneuver	
36	AGOSSADOU	Firmin	27	M	Saleswoman	66304820
37	MOUSSA	Aichas	18	M	Mechanic driver	
38	ABALLO	Adrien	46	M		97534117
39	DOHOU	Gisele	28	F	SODECO Agent	96406787
40	DAGGER	Longed for	54	M	Electrician	61231794
41	DOSSOU	Theodore	39	M	Driver	95089851
42	AGOSSOU	Gabriel	32	M	Driver	64067724

**A total of 42 stakeholders including 10 women and 32 men**

## 8.2. Summary of the concerns and wishes expressed by the populations

No.	SPEAKERS	QUESTIONS	ANSWERS
1	<b>GLIDJA Francis</b>	<p>What measures are taken for the health of the population and workers in the event of exposure to risks during the demolition and construction of the hotel? It should be noted that the area is inhabited by French and Nigerian expatriates and the school which welcomes all nationalities.</p>	<p>For site workers in the event of exposure to risks, medical examinations are provided for all workers to determine their state of health before hiring. If in the event of illness at the end of the work, support will be provided for them.</p> <p>With regard to local residents, steps will be taken to meet local residents close to the site and to study the possibilities and measures to be taken to face the risks.</p>
2	<b>KINKPA Macarius</b>	<p>What measures are taken in relation to the potential impacts generated by the project?</p>	<p>The measures are numerous, depending on each impact, the ESIA has planned measures to reduce these negative impacts and all stakeholders will ensure that.</p>
3	<b>CADJA Pascal</b>	<p>1. What measures are taken to deal with youth unemployment? 12th Borough and most of the young people who had worked in the hotel?</p> <p>2. What are the arrangements made for the occupation of the good ladies around the hotel for the sale of food to the workers of the hotel? who cannot eat at the hotel and during peak hours there is a concentration of people around who are sources of insecurity</p>	<ul style="list-style-type: none"> <li>- In terms of youth employment, priority will be given to local workers, especially young people from the neighborhood, depending on their skills.</li> <li>- Those who had worked at the Marina hotel, recommendations are made and they will be prioritized during the recruitment phase of Sofitel Hotel staff.</li> <li>- For the canteens of the workers who work on the site, recommendations will be made to create a canteen in order to avoid any installation around the hotel for the activities source of concentration of people in the zone of the hotel.</li> <li>- As a proposal, the elected officials will be involved in the search for places that can serve the workers to eat, but no structure will be installed around the hotel to Restoration</li> </ul>

### 8.3. Protocol to ensure the views of women and vulnerable groups

One of the objectives of the PEPP is to ensure dialogue in accordance with local conventions and protocols, including considerations related to social inclusion, equity and equality between men and women. With this in mind, additional processes should be added as needed for vulnerable or marginalized groups.

Measures to ensure the participation of women and vulnerable and marginalized groups include:

- Hire experienced staff (men and women) who are aware of the issue of gender mainstreaming and social inclusion, particularly within teams of facilitators and investigators, but also at the level of local agents;
- Provide transport to and from meeting places in order to facilitate the movement of people who do not have the means;
- Find and implement mechanisms / formulas to ensure the participation of people with disabilities;
- Carry out discreet visits to the communities and areas affected by the project, in order to identify vulnerable people, such as people with disabilities, people who do not come to meetings, and sharecroppers or others who do not have high status in the community;
- Interview people in the health sector and NGOs to identify adults and children who may be sick and incapable;
- Interview teachers and community leaders and social services;
- Interview those who take charge of cases of gender-based violence (the animators of social assistance services; of the Integrated Center for the Support of Gender-Based Violence: CIPeC / VBG in Cotonou) to try to identify children who do not attend school, or households where there are women affected by gender violence;
- Conduct interviews with vulnerable people;
- Produce information and communication tools linked to the specific situation of women and vulnerable people;
- Locate very old people and others who may be affected by the project and who may need special assistance;
- Organize specific focus groups for women, youth and vulnerable groups;
- Establish partnership (s) with NGOs specializing in gender issues;
- Demand the inclusion of women and other vulnerable or marginalized groups in all committees, establishing and enforcing “quotas”. It is suggested to aim for half of the committee representatives to be women to include in presentations, posters and other information materials as the engagement process requires informed participation of women, youth and people of vulnerable groups;
- Make men aware of the importance of the representativeness of women in consultation processes.

## 9. Complaints Mechanism

This section explains the methodology for submitting, receiving and recording complaints from communities affected by the project and the best approach to respond to and investigate these complaints.

An important element of successful stakeholder engagement is having a system in place to capture and respond to complaints from all stakeholders throughout the life of the project. Such mechanisms need to be put in place so that all relevant stakeholders can be assured that their complaints are recognized and dealt with in a consistent and transparent manner.

The complaints mechanism is an essential means of responding to concerns expressed by stakeholders regarding the impacts of the project and their mitigation. Stakeholders will be able to submit a complaint even if they only suspect that an adverse effect may be due to the project.

It will be the responsibility of the ERC team to validate and defend whether or not the suspected negative impact is due to project activities. The ERC team will assess each complaint on a case-by-case basis. This will result in either a corrective action or an argument justifying the rejection of the complaint.

### 9.1.1. Definition and scope of the mechanism

A complaint is a concern raised by an individual or group affected by the activities of the project. Concerns and complaints can arise from real or perceived impacts of activities and they can both be brought in the same way and dealt with using the same procedures.

The complaints handling procedure is intended to collect and process the following categories of complaints:

- environment, health, safety: all subjects related to the impact of project activities on the environment, health and safety of communities that may be affected;

Example: complaints related to noise and pollution

- employment: dissatisfaction with the recruitment procedure;

Example: grievances of discrimination in the selection of workers

- logistics and transport: complaints related to operational vehicles and freight transport;

Examples: exceeding speed limits, dust generated by vehicles, road accidents

- social behavior in the community: complaints about the behavior of employees of SUMMA and its subcontractors;

Example: lack of respect for members of a community

Thus, the procedure excludes certain types of complaints, which must be addressed to other services or structures, as indicated in the table below.

Complaints outside the scope	Service or structure concerned
Complaints subject to appeal before a judicial body	SUMMA Legal Department
Complaints by SUMMA employees relating to their contract or terms of job	SUMMA Human Resources
Complaints from supplier employees of goods and services	Their employer
Requests relating to social funds or local development projects	Environmental and Social Service (ESS)
Commercial complaints coming from partners, suppliers of goods and services	Entities responsible for relations with third parties

### 9.1.2. Principles and good practices

The following principles are applied to the handling of complaints:

- **legitimate** : the procedure is designed and implemented in such a way as to be perceived as legitimate and to increase the confidence of local communities, in particular through regular verification of the communities' perception of the procedure and regular reporting of its operation;
- **fair, predictable and accessible** : the procedure is well known and understood by local communities;
- **transparent and based on participation and dialogue** : the complainant is regularly informed of the progress of the processing of his complaint, which is dealt with within an acceptable time limit;
- **compatible with local laws and regulations as well as internationally recognized human rights**;
- **a source of lifelong learning** : the origin of complaints is analyzed in order to derive criteria for improving and preventing the operational procedures that generated these complaints.

The procedure also ensures the protection of complainants, in particular by guaranteeing the complainant's right to confidentiality and anonymity and protection against reprisals.

In addition, the procedure takes into account complaints from specific sub-groups within communities (women, youth, vulnerable groups, minorities or elders) as well as those made by individuals from said communities.

### 9.1.3. Goals

The objectives of a complaints mechanism are to:

- give stakeholders the opportunity to voice their concerns and complaints by providing them with a clear and simple procedure, which offers a guarantee of support and rapid response from the promoter;
- manage the handling of stakeholder complaints in a structured and systematic manner and allow the monitoring of the effectiveness of the mechanism and the improvement of impact management;

- improve relations with stakeholders by being responsive and respectful and by handling their complaints in a fair and transparent manner, in accordance with international best practices.

#### 9.1.4. Role and responsibilities

The management of complaints will be placed under the responsibility of the Community Relations Team (ERC).

Within this team, one or more complaints management agents should be recruited according to the forecast flow of expected complaints which depends on the geographic scope of the project.

A complaints officer, who will be the point of contact between SUMMA and stakeholders, will be responsible for:

- respect and apply SUMMA's environmental and social standards;
- disseminate information on the existence and operation of the complaints management mechanism to the populations living around the project and to local authorities through regular information sessions, meetings with local authorities, poster displays, and any other culturally appropriate means;
- receive complaints and ensure that they are properly recorded and documented in the complaints register;
- coordinate field investigations and respond to complaints;
- maintain clear communications and keep the complainant informed in accordance with the deadlines set out in this PEPP;
- monitor the performance of the PEPP in terms of effectiveness and efficiency and report regularly to the ERC team leader and SUMMA management.

The ERC team should also ensure that the project subcontractors, in particular the main company which will be responsible for the construction of the site, are aware of the complaints management mechanism and that a joint management procedure is put in place. in place to ensure that complaints against the main company are forwarded by the latter to SUMMA which will manage them in collaboration with the Company.

#### 9.1.5. Methodology for handling complaints

The procedure to be put in place for the management of complaints is presented in the following table. The objectives for complaint resolution times are:

- 14 days for unfounded complaints of low to moderate importance;
- 24 days for complaints of high importance.

If additional time is needed to complete the investigation, the Stakeholder Coordinator will inform the complainant of the reasons for the delay and the schedule will be revised.

If a complaint enters step 8 or 9 of the process, deadlines can no longer be guaranteed due to the involvement of the management of the company and third parties in the mediation.

Step	Time limit	Step Detail
<b>Step 1 :</b> Submission of the complaint	-	<p>A complaint can be submitted orally or in writing:</p> <ul style="list-style-type: none"> <li>▪ During regular meetings between stakeholders and SUMMA</li> <li>▪ During field visits conducted by the ERC team</li> <li>▪ By means of communications by letter, fax, telephone or e-mail.</li> </ul> <p>For this purpose, the contact details of the ERC team will be provided to local authorities and will also be displayed in public places, easily accessible and visible.</p> <p>A complaint form will also be made available to affected populations.</p>
<b>2nd step :</b> Registration of the complaint and acknowledgment of receipt	5 days after the submission date	<p>For concerns and complaints that have been submitted orally, the ERC team will organize a meeting where the concern or complaint can be explained in detail and recorded on a complaint logging form. For written complaints, documents sent by the complainant will be scanned and archived on the ERC team's server.</p> <p>The complaint will then be registered in the complaints register set up by SUMMA.</p> <p>The stakeholder who lodged the complaint will then be contacted within 5 days to confirm that SUMMA has received their complaint.</p>
<b>Step 3:</b> Study of the admissibility and categorization of the complaint	3 days later step 2	<p>The ERC team first examines whether the complaint is legitimate and admissible, that is to say whether it can actually find its source in a failure of the project.</p> <p>It then categorizes the complaint according to its main cause: health, safety, environment, cultural heritage, nuisance, etc.</p> <p>It then determines the severity of the complaint according to 3 levels: low, moderate and high depending on whether the complaint:</p> <ul style="list-style-type: none"> <li>▪ Originates from a threat to human health and safety or the protection of the environment</li> <li>▪ Requires more or less costly corrective actions and the potential payment of compensation.</li> </ul>

<b>Step 4:</b> Simple response for non-admissible complaints or low to moderate importance	3 days later step 3	Complaints that are not admissible or of simple importance are the subject of a response by letter delivered by hand to the complainant, explaining the reasons for rejecting his complaint.
<b>Step 5:</b> Investigation of complaints of high importance	5 days later step 3	Complaints of moderate or high severity are reported to SUMMA's management, which then mandates an investigation. This survey can be carried out jointly with the competent State services and in particular the departmental services of: <ul style="list-style-type: none"> <li>▪ Departmental Directorate of the Living Environment and Sustainable Development (DDCVDD) of Littoral</li> <li>▪ Departmental Directorate of Agriculture, Livestock and Coastal Fisheries</li> <li>▪ Republican Police</li> <li>▪ Coastal Department of Health</li> </ul> <p>The results of the investigation and all evidence are recorded and archived for future needs.</p>
<b>Step 6:</b> Proposal of a solution to the complainant	5 days later step 4 or 5	In view of the results of the investigation, SUMMA proposes a solution to the complainant which may be based on a correction made to the observed breach, compensation in kind or in money. <p>The ERC team meets with the complainant to offer him the solution and obtain his agreement.</p>
<b>Step 7:</b> Resolution and closure of the complaint	3 days later step 6	The solution is implemented under the control of the ERC which then asks the complainant to sign a complaint closure form.
<b>Step 8:</b> Mediation if the complainant refuses the proposed solution		If the complainant is not satisfied with the proposed solution, he may lodge a new written complaint with the Management of SUMMA and will be invited to participate in a mediation meeting where the complainant may be accompanied by the person who advises him ( for example a traditional chief or a lawyer).
<b>Step 9:</b> Legal remedy for the complainant		If the complainant is not yet satisfied with the Management's response, the complainant will be invited to present their complaint to the competent authorities and provide them with the necessary contact details.

#### 9.1.6. Monitoring and evaluation

The ERC team should put in place a system for recording all complaints received. This system will be based on:

- the development of a register of complaints, in tabular form, which will make it possible to record each complaint and all the necessary information on it, as well as the solutions provided. This register will allow statistical analyzes to be carried out for monitoring purposes.
- setting up a computer server on which the constituent elements of each complaint file will be stored: letter from the complainant, photos of the element that led to the complaint, investigation file, solutions proposed to the complainant, mediations undertaken, etc. .

In order to monitor the effectiveness of the complaints mechanism, key performance indicators will be used such as:

- the number of complaints received, closed or in the process of being resolved;
- the average number of complaints filed per complainant;
- the number of complaints by degree of importance;
- the number of complaints by category (health, safety, environment, relocation, etc.)
- the average time taken to resolve a complaint.

Periodic complaints management reports (also covering engagement activities) will be produced by the ERC team for SUMMA management.

As part of the reporting of the results in the annual environmental monitoring report to be prepared for the EBA, analysis of trends and the time taken to resolve complaints will help to assess the effectiveness of the complaints mechanism.

Complaints of high severity may be the subject of feedback sessions within the ERC team or even with the entities concerned by the complaint (construction companies, legal department, etc.). This feedback will make it possible to identify what worked or did not work in the complaints management procedure and to put in place corrective measures to this procedure.

#### 9.2. Implementation of the Stakeholder Engagement Plan

This section details the resources and responsibilities of the ERC team within SUMMA for the effective implementation of the PEPP, as well as the methods and frequencies of reporting and monitoring.

##### 9.2.1. Resources, roles and responsibilities

Overall responsibility for stakeholder consultation and participation will rest with SUMMA, which will form a Community Relations Service (CRS). This team will be integrated into the Environmental and Social Department (DES) and it will have to work directly with the communication manager to prepare the communication messages and supports so that they are in line with the more global communication plan developed for SUMMA.

The SRC team will be made up of:

- a team leader;
- two community relations officers;

- two complaints management officers.

The following points describe the main responsibilities and tasks performed by the SRC team.

The team leader will be responsible for:

- manage the team on a daily basis;
- develop management and monitoring tools such as the register of complaints, the register of commitments, the directory of stakeholders, standard forms, etc. ;
- develop the team's annual commitment schedule detailing the types of activities to be carried out, the targets set, the subjects to be discussed, in collaboration with the Communication Department;
- lead the most strategic engagement activities;
- deploy and pilot the complaints management mechanism in the villages and municipalities of the study area;
- implement and manage all tasks related to the stakeholder participation process;
- establish a plan for monitoring and evaluating commitments and handling complaints;
- monitor the PEPP to monitor the progress of its implementation and assess the effectiveness of the measures taken to ensure its objectives, including that all stakeholders are identified at each stage, that its concerns are adequately addressed and within the established timeframe, that the levels of interest and support for the project are acceptable;
- provide reports to SUMMA management for subsequent submission to other stakeholders such as EBA;
- be informed of the main changes in project activities so that disclosure and consultation can be managed before moving forward through the project phases, namely: pre-construction, construction, commissioning, operation, maintenance interventions, intervention interventions emergency, operational safety management, etc.

The function of community relations officers will be:

- liaise between SUMMA and stakeholders;
- organize in situ the engagement activities planned in the annual planning, write the minutes and reports;
- identify new stakeholders and update the directory;
- record engagement activities in the registry;
- coordinate SUMMA's response to all issues related to stakeholder engagement;
- manage community issues that may emerge and escalate these issues to the team leader for action.

### 9.2.2. Monitoring and evaluation

This PEPP is a document that must be evaluated and updated periodically by the SRC team after SUMMA validation. The following indicators will be used for monitoring and evaluation:

- number of press releases;

- number of working meetings and thematic workshops;
- number of public information meetings;
- number of focus groups;
- number of individual interviews;
- number of official visits;
- number of participants in different engagement, distinguishing between men and women.

In order to qualitatively assess the engagement process, satisfaction surveys may be conducted regularly with local stakeholders. These surveys will help determine if the project is facing consultation fatigue in order to scale or not its engagement effort.

Periodic reports of complaints management and engagement activities will be prepared by the SRC team for the management of SUMMA. These reports will contain:

- engagement activities carried out by the team during the period (meetings with stakeholders and disclosure materials);
- new entries in the complaints register;
- new commitments and concerns to be taken into account;
- new stakeholder groups (if identified);
- monitoring and evaluation indicators;
- plans for the next or longer term.

The SRC team will also prepare an annual report on complaints management and engagement activities which will be integrated into the environmental monitoring report transmitted annually by SUMMA to the EBA.