

**IPN REQUEST 22/06**  
January 24, 2023

## **MEMORANDUM TO THE EXECUTIVE DIRECTORS INTERNATIONAL DEVELOPMENT ASSOCIATION**

### **Request for Inspection**

**Benin, Western Africa: West Africa Coastal Areas Resilience Investment Project (P162337)  
and Global Environment Facility (GEF) (P092289)**

### **Notice of Non-Registration**

#### **Summary**

1. In accordance with paragraph 18 of the Resolution<sup>1</sup> on the Inspection Panel (the “Panel”), I hereby inform you that on October 31, 2022, the Panel received a Request for Inspection (the “Request”, attached) of the Benin, Western Africa: West Africa Coastal Areas Resilience Investment Project (P162337) and Global Environment Facility (GEF) (P092289) (the “Project”).
2. Two community members from Hilla Condji, Grand Popo, Benin, submitted the Request. On December 9, 2022, the Panel received an additional 117 signatures from community members in support of same. The Requesters authorized four members of the community to represent them in the Inspection Panel Process (the “Requesters”). They asked the Panel to keep their identities confidential. The Requesters raise concerns regarding the involuntary resettlement related to the Project, the Project impact on fisheries and fishing communities, and its impact on cultural heritage and places of worship.
3. The Panel acknowledged receipt of the Request on its website on December 13, 2022. The Panel’s initial due diligence concluded that the Request did not meet all admissibility criteria, as the Panel was not satisfied that Management had a “*reasonable opportunity to respond*” to the allegations raised in the Request. Therefore, I am notifying you that I have not registered this Request.

#### **The Project**

4. The West Africa Coastal Areas Resilience Investment Project (P162337) was approved on April 9, 2018, for a total of US\$221.7 million equivalent, of which US\$120 million equivalent is in an International Development Association (IDA) Credit, and US\$70 million equivalent is in an

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<sup>1</sup> The World Bank Inspection Panel, International Development Association, Resolution No. IDA 2020-0003, September 8, 2020 (the “Resolution”).

IDA Grant. It is a regional project benefitting Benin, Côte d'Ivoire, Mauritania, São Tomé and Príncipe, Senegal, and Togo. Benin is a recipient of US\$30 million equivalent in IDA Credit and US\$15 million equivalent in IDA Grant. In addition, the Global Environment Facility (P092289) is providing a Grant of US\$20.25 million to Benin, São Tomé and Príncipe, and Togo, US\$11.57 million of which is for Benin. On June 18, 2021, the Board of Executive Directors approved an additional Credit of US\$18 million equivalent and an additional Grant of US\$18 million equivalent to cover cost overruns. The additional financing is to support Component 3 (described below) in Benin and Togo. Benin is the recipient of US\$12 million equivalent of the additional IDA Credit, and US\$12 million equivalent of the additional IDA Grant.

5. The Project is a Category A project that has triggered the following safeguard policies: Environmental Assessment (OP/BP 4.01), Natural Habitats (OP/BP 4.04), Physical Cultural Resources (OP/BP 4.11), and Involuntary Resettlement (OP/BP 4.12). The Project was 34.32 percent disbursed at the time of receipt of the Request. The expected closing date of the Project is December 31, 2023.

6. The Project Development Objective is “*to strengthen the resilience of targeted communities and areas in coastal Western Africa.*”<sup>2</sup> The Project includes four components:

- Component 1 - Strengthening regional integration;
- Component 2 - Strengthening the policy and institutional framework;
- Component 3 - Strengthening national physical and social investments, and
- Component 4 - National coordination.

7. Components 2 and 3 are relevant to the Request. According to the Project Appraisal Document (PAD), Component 2 aims to help countries design an adequate policy framework and necessary tools to develop and operationalize their coastal management strategies and plans at the national and regional levels. It will provide such support to coastal management and land use strategies, taking into consideration land rights security. Emphasis will be put on developing the Environmental and Social Impact Assessment systems and guidelines for coastal planning and infrastructure. It will provide support on the land issues expected to emerge when the planned relocation of communities becomes necessary.<sup>3</sup>

8. Component 3 seeks to finance coastal investments or subprojects, to protect vulnerable areas from coastal erosion and flooding, to support pollution control and waste management operations, and to promote climate-resilient coastal development. It will support dialogue on the possible need for planned relocation of high-risk communities in the longer term, the development of a participatory process for relocation planning and decision making, the implementation of a socio-environmental monitoring system for implementing decisions on relocation. In certain cases, the Project may provide financing to assist with the planned relocation of those at high-risk in the Project area who must move from their current places of residence or work due to persistent coastal flooding or erosion.<sup>4</sup>

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<sup>2</sup> Project Appraisal Document (PAD), p. 29, para. 36.

<sup>3</sup> PAD, pp. 34 and 35, paras. 52-55.

<sup>4</sup> PAD, pp. 35-37, paras. 56-62.

## The Request

11. The Requesters allege that the Project has aggravated their poverty and caused unemployment in their community by banning and displacing fishing activities in the Project zone. They claim the Project is in non-compliance with the Bank's Involuntary Resettlement Policy. The Requesters claim that some Project affected people (PAPs) were initially included in the resettlement process but then ultimately excluded and not compensated, while some others did not receive adequate compensation. According to the Requesters, some of them were initially identified as affected persons, surveyed, and signed a statement of payment, but were later excluded from being considered eligible for compensation payment.

12. The Requesters also claim that the Project did not properly evaluate their cultural heritage and places of worship. They claim that the Project has not analyzed all the adverse effects it has on them and has misjudged the harm it caused in their locality.

## Panel's Observations and Determination

13. In accordance with its Operating Procedures,<sup>5</sup> after receiving the Request and some clarifications from the Requesters, the Panel issued a Notice of Receipt (in English) on its website on December 13, 2022, and shared the French version of the Notice with the Requesters on the same date.

14. The Panel conducted its due diligence by reviewing the information contained in the Request and Project documents, as well as by speaking to the Requesters several times in November and December 2022 to understand their concerns better. The Panel verified that the Request is not frivolous, absurd or anonymous, and was submitted by at least some individuals who clearly live in villages in the Project area. The Panel verified that the subject matter of the Request does not concern issues of procurement and, at the time of receipt of the Request, the Project was less than 95 percent disbursed, and its closing date is December 31, 2023. The Panel has not previously made a recommendation on the issues raised in this Request.

15. The Panel reviewed the correspondence between the community members and Bank Management, which it had received from the Requesters. The Panel asked the Requesters whether Management knew of the Requesters' concerns and had an opportunity to respond prior to the submission of the Request for Inspection.<sup>6</sup> The Requesters believed that the issues in the Request had been sufficiently raised with Management.

16. On January 19, 2023, the Panel met with Management to understand better its position regarding the Request. Management informed the Panel that it did not receive specific information concerning the allegation that the Project impact on fishing activities has aggravated poverty and

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<sup>5</sup> Inspection Panel Operating Procedures, December 2022.

<sup>6</sup> The Panel Operating Procedures, p.16, para 44, require the Panel to confirm that, "*prior to the submission of the Request, steps were taken to bring the concerns raised in the Request directly to the attention of Bank Management, and that Management had a reasonable opportunity to respond.*" The Operating Procedures add that "*Requesters need not approach the Bank themselves, but the Request should describe what steps and actions were taken to make sure that the issues included in the Request were brought to the attention of the Bank, as well as Management's response to these actions.*"

caused unemployment and that it did not receive specific information regarding improper or inadequate assessment of the Requesters' cultural heritage and places of worship. Management acknowledged receiving information concerning two specific cases of involuntary resettlement and the allegation that compensation was not paid to them. Management added that it had been reviewing documentation related to these cases with the Project Implementing Unit (PIU) when the Requesters' representatives communicated that they neither wished to engage with the PIU nor provide further information.

17. Management informed the Panel that it received a first communication raising concerns about the Project on September 27, 2022. These concerns were about delays in compensation, the Project's income-generating activities, and allegations that some displacement related to fisheries had not been adequately considered. The next day Management offered to meet with the Requesters to discuss these issues. Management said the Requesters did not respond to this offer until December 26, 2022, and that a first meeting with the Requesters' representatives took place on December 30, 2022. Management stated that the Requesters' representatives agreed to meet with the PIU on January 13 in Grand Popo to follow up on pending grievances. However, according to Management, on January 11 and 17, 2023, the Requesters' representatives said they did not want to engage with the PIU and refused to share any further information claiming that the Inspection Panel is managing their case.

18. Management informed the Panel that the information provided by the Requesters regarding the concerns raised in the Request were not sufficient to allow it "*a reasonable opportunity to respond*" as required in the Panel's Operating Procedures. Management says it remains open to review and address all grievances once more specific information is provided.

19. The Panel considered the information provided by the Requesters and Management. The Panel understands Management's view that insufficient information was shared with it regarding the alleged impact on fishing activities and the complaint that the Project did not properly evaluate the Requesters' cultural heritage and places of worship. Management was also awaiting further details from the Requesters concerning the compensation payments for resettlement.

20. In light of the foregoing and in accordance with the Panel Resolution and its Operating Procedures, and after reviewing the information gathered through its own due diligence, the Panel is not registering the Request for Inspection. The Panel could not satisfy itself that the issues raised with Management prior to the submission of the Request for Inspection allowed Management "*a reasonable opportunity to respond.*" This non-registration does not preclude the possibility of a future Request for Inspection related to this Project.

Yours Sincerely,



Attachment: Request for Inspection (redacted)

cc: Mr. David Malpass, President, International Development Association  
Requesters (confidential)

**Attachment**

**Request for Inspection  
(Redacted)**





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The Inspection Panel

THE WORLD BANK  
1818 H St., NW, Washington, DC 20433, USA. Fax: +1(202)-522-0916. E-mail: [ip@worldbank.org](mailto:ip@worldbank.org)

## FORMULAIRE DE DEPOT DE PLAINTE (DEMANDE D'INSPECTION)

Au:

Secrétaire Exécutif, Panel d'Inspection, Banque Mondiale, MSN: MC 10-1007

1818 H St., NW, Washington, DC 20433, USA. Fax : +1(202)-522-0916. E-mail : [ip@worldbank.org](mailto:ip@worldbank.org)

### Section 1: Plainte

1. Quel(s) préjudice(s) pensez-vous que le Projet financé par la Banque a causé(s) ou est susceptible de causer à vous ou à votre communauté ? Veuillez s'il vous plaît le(s) décrire le plus précisément possible.

Nous avons l'impression que les projet Waca n'a pas pris en compte tous les impacts, des maisons, héritages culturel, église, et certains activités génératives de revenus (blocage des activités de la pêche et autres.

2. Quel est le nom du projet ? (si celui-ci est connu)

Waca

3. Où se situe le projet ? (Veuillez s'il vous plaît donner le nom du pays)

Ehretto Hilalondji Benin et grand Pofo

4. Vivez-vous dans la zone du projet ?

Oui

5. Avez-vous déjà sollicité la Direction de la Banque Mondiale pour leur faire part de vos préoccupations ? Si oui, veuillez s'il vous plaît donner les détails de ces échanges et expliquer pourquoi vous n'êtes pas satisfaits des actions de la Banque pour répondre à vos préoccupations.

Oui, nous avons eue les échange avec la banque ainsi que les membres de la dite projet. Après le premier échange avec la banque le 27/09/ce nous avons l'impression que les concernés nous suivent dans nos parcours jusqu'à ce en fin de débiter les auteurs de la lettre envoyée à la banque.

6. Veuillez, si vous les connaissez, faire la liste de la ou des procédure(s) opérationnelle(s) de la Banque dont vous pensez qu'elle(s) n'a ou n'ont pas été respectée(s).

la violation de la directive BP 4.12, les non respect de l'évaluation des héritage culturel et les liens de culture de la pêche dans la zone du projet.



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7. Vous attendez-vous à un quelconque type de représailles ou de menaces suite au dépôt de cette plainte ?

Oui.

## Section 2: Coordonnées

8. Êtes-vous les auteurs de la plainte ou représentez-vous les auteurs de la plainte ?

Les auteurs de la plainte :  Le ou les représentant(s) des auteurs de la plainte :

9. Souhaitez-vous que le Panel préserve la confidentialité de votre nom et de vos coordonnées ? (Le Panel d'inspection ne partagera ces informations avec personne sans votre accord préalable). Oui  Non

10. Nom des plaignants (Deux noms et signatures sont requis au minimum) :

Plaignant 1		Plaignant 2	
Nom	[REDACTED]	Nom	[REDACTED]
Adresse	Hilla - Condji	Adresse	Louis - Condji
Téléphone	[REDACTED]	Téléphone	[REDACTED]
E-mail	[REDACTED]	E-mail	[REDACTED]

11. Nous, les signataires de ce formulaire, demandons au Panel d'inspection de mener une enquête à propos des préjudices décrits ci-dessus.

Signatures (Plus de signatures peuvent être envoyées en pièce-jointe) :

[REDACTED]

### REMARQUES :

- Veuillez s'il vous plaît joindre tous documents complémentaires susceptibles d'étayer votre plainte, si ceux-ci sont disponibles.
- Si vous avez une quelconque difficulté à remplir ce formulaire, veuillez s'il vous plaît contacter le Panel d'inspection à l'adresse suivante : [ipanel@worldbank.org](mailto:ipanel@worldbank.org) ou par téléphone : +1-202-458-2000.



Agoué, le 24 Septembre 2022

### Acte d'Adhésion et de Procuration

Nous soussignés Messieurs et Mesdames propriétaires de maison, sinistrés de l'érosion côtière dans la commune de Grand-Popo, Arrondissement d'Agoué, Villages de Hilla-Condji, Louis-Condji et Agoué : omis pour certains, évalués avec un état de paiement pré signé et par la suite rejetés et laissés pour compte pour quelques-uns et d'autres mal évalués, donnons par cet acte nos adhésions et nos procurations collectives aux sieurs [REDACTED]

[REDACTED] de nous représenter devant toutes juridictions nationale et internationale afin que les omis soient pris en compte, les évalués laissés pour compte soient dédommagés à l'indice réel et que les mal-dédommagés soient réévalués.

En foi de quoi, nous leur signons communément cet acte pour servir et valoir ce que de droit.

Ont signé

[REDACTED]

[REDACTED]

NB : Liste des signataires ci-jointe