



RÉPUBLIQUE TOGOLAISE

PforR TRANSFORMATIVE SOCIAL ASSISTANCE FOR RESILIENCE PROGRAM (ASTRE)



ENVIRONMENTAL AND SOCIAL SYSTEMS ASSESSMENT (ESSA)

FINAL REPORT

APRIL 2023



PforR
Program-for-Results

THE WORLD BANK
IBRD • IDA | WORLD BANK GROUP

Table of contents

List of photos.....	ii
List of figures.....	Error! Bookmark not defined.
LIST OF ACRONYMS AND ABBREVIATIONS	iii
SECTION I. PROGRAM DESCRIPTION.....	8
Introduction	9
A./ Country context	9
B./ Sectoral (or multisectoral) and institutional context	10
C Relationship to the CPS/CPF and rationale for use of the instrument	12
1.1.2. Objectives of the ESSA	12
1.1.4. Description of the scope and thematic boundaries of the Program	14
1.1.5. Development goal (ODP) and outcome indicators at the ODP level	15
1.1.5.1.ODP Level Outcome Indicators	15
1.1.6. Description of PforR activities.....	16
1.1.6.1.Description of the geographical scope of the PforR program.....	16
1.1.6.2.Differences in scope between the Borrower's program and the Bank-financed program.....	16
1.1.7. Institutional and Implementation Arrangements	18
SECTION II. DESCRIPTION OF EXPECTED PROGRAM ENVIRONMENTAL AND SOCIAL EFFECTS.....	20
2.1. Environmental and social benefits of the PforR Togo ASTRE	21
2.1.1. Key environmental benefits of the program	21
2.2. Environmental and social risks and negative impacts of the PforR Togo ASTRE	23
2.2.1. Main environmental risks and negative impacts of the PforR Togo ASTRE	23
2.2.2. Main social risks and negative impacts of the program	25
SECTION III. ASSESSMENT OF THE BORROWER'S ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEMS	28
3.1 Environmental management system.....	29
3.1.1. National legal framework for environmental management.....	29
3.1.2. Environmental management procedures.....	30
3.1.4. Environmental performance	31
3.1.4.1 Analysis of the environmental management system	31
3.1.4.2 Environmental Management Capacity	33
3.1.4.3. Capacities of other institutions involved in the PforR Togo ASTRE.....	33
3.2. Social management system.....	35

3.2.1. National legal framework for social management	35
3.2.2 Institutional arrangement for social protection	37
3.3. Social performance	39
3.3.1. Social management system	39
SECTION IV. ENVIRONMENTAL AND SOCIAL MANAGEMENT RECOMMENDATIONS AND ACTION PLAN	45
4.1. Recommendations	46
4.1.1 Generic environmental measures	46
4.1.2. Social measures	47
4.1.3. Environmental and social eligibility process for FORR activities	50
4.2. Conclusion on the level of environmental and social risk in the governance of the PforR	52
SECTION V. APPENDICES	53
5.1. Attendance list of consultations carried out	54
5.2. Outcome of the stakeholder consultation.	65
5.4. Annex 4: World Bank Core Principles.....	80

List of tables

Table 1a-b : Limitations of PforR interventions within the government program.....	16
Table 2 Positive social impacts of the PforR program.....	22
Table 4 Main risks and negative social impacts of the program	25
Table 5 Summary of key environmental legislation related to the PForR Togo ASTRE	29
Table 6 Institutional actors involved in the environmental protection of the PforR.....	31
Table 7 Legal and regulatory texts on social management	35
Table 8 Gaps in the protection system in Togo.....	40
Table 9 Consistency between the Borrower's environmental and social system and the core principles of the PforR	43
Table 10 Mitigation Measures for Environmental Risks and Impacts	46
Table 11 Generic social impact mitigation measures	49
Table 12 PforR core principles	80

List of photos

Photo 1 Photo 1: Hybrid training workshop for national social protection actors by World Bank experts.	57
Photo 2 Partial view of the FSB cash transfer beneficiaries' consultation	62
Photo 3 Partial view of the consultation with a sample of NOVISSI cash transfer recipients	64

LIST OF ACRONYMS AND ABBREVIATIONS

ANGE	Agence Nationale de Gestion de l'Environnement
ANID	Agence nationale d'identification
ATD	Agence Togo digitale
ANPC	Agence Nationale de la Protection Civile
ASS	Afrique Sub-Saharienne
ASTRE	Assistance Social Transformatrice pour Résilience.
CAMOFs	Cellule d'Appui à la Mise en Œuvre des Filets Sociaux
CNPPS	Comité National pour la Promotion de la Protection Sociale
COSO	Social cohesion of the northern regions of the Gulf of Guinea
COVID-19	Maladie à Coronavirus
CRT	Caisse de Retraites du Togo
CSU	Couverture Sanitaire Universelle
CUT	Compte Unique du Trésor
DDPF	Direction de la Dette Publique et du Financement
DEEE	Déchets d'Équipements Électriques et Électroniques
DGAS	Direction Générale des Affaires Sociales
DLI	Indicateur lié au décaissement
DLR	Résultats liés aux décaissements
E&S	Environnementale et Sociale
EIE	Études d'Impact Environnementale
EIES	Études d'Impacts Environnementales et Sociales
ESES	EVALUATION DU SYSTEME ENVIRONNEMENTALE ET SOCIALE
FETAPH	Fédération Togolaise des Associations de Personnes Handicapées
FSB	Filets sociaux de sécurité et services de base
GFP	Gestion des Finances Publiques
GoT	Gouvernement Togolais
GRH	Gestion des Ressources Humaines
GRM	Grievance Resolution Mechanism
ICH	Indice de capital humain
IDH	Indice de Développement Humain
IIAG	Indice Ibrahim 2020 de la Gouvernance Africaine
INAM	Institut National d'Assurance Maladie
MDA	Ministères, Départements et Agences
MERF	Ministère de l'Environnement et des ressources forestières
ODEF	Office de Développement et d'Exploitation des Forêts
ODP	Objectif de Développement du Programme
OIT	Organisation Internationale du Travail
OSC	Organisations de la société civile
PAR	Plan d'Action de Réinstallation
PBB	Budgétisation par programme
PEP	Programme d'Excellence Présidentielle
PforR	Prêt-programme pour les résultats / Program-for-Results Financing
PFR	Pays à faible revenu

PGES	Plan de Gestion Environnementale et Sociale
PIB	Produit Intérieur Brut
PNDS	Plan National de Développement Sanitaire
PNE	Politique Nationale de l'Environnement
QE	Quitus Environnemental
RSPM	Registre sociale des personnes et des ménages
SEA/SH	Exposition aux abus sexuels/ harcèlement sexuel
SDI	Service Delivery Indicator
TDR	Termes De Référence
VBG/VCE	Violence basée sur le genre/ violence contre les enfants
VIH/SIDA	Virus de l'Immunodéficience Humaine / Syndrome de l'Immunodéficience Acquise

EXECUTIVE SUMMARY

The COVID-19 situation, coupled with the turmoil of climate change, has hindered Togo's economic progress and development over the past few years. In addition, Togo has experienced numerous security crises related to terrorism as well as to the insufficient level of social security, especially for households.

Measures have been taken to address these tensions, including the social safety net programs, an emergency cash transfer program, and the development of the basic elements of a social protection delivery system focused on the poorest households. In response to these challenges, based on successful experiences and lessons learned from Novissi and the Social Safety Nets and Basic Services (FSB) project, the government is committed to strengthening and reforming its social protection architecture,

In this context, the proposed ASTRE PforR is designed to support the Togolese government's efforts to achieve transformative change in social protection architecture and programming.

The proposed program aligns with the Togo 2017-2020 Country Partnership Framework (CPF), which has been extended through 2022.

The PforR is designed to support selected sets of activities within the four axes of the National Social Nets Program (*PNPSNC* 2023-2032): (1) Novissi Plus Program, (2) Resilience of population to shocks; 3) Modernization and strengthening of the non-contributory social protection system with an integrated social information system, and 4) Technical coordination, monitoring and evaluation.

The ESSA aims to identify the strengths and weaknesses of the environmental and social systems specifically applicable to the proposed PforR in order to determine the actions needed to improve them. Specific actions to address the identified weaknesses or gaps are proposed in the action plan resulting from the ESSA, which is an integral part of the program action plan.

The proposed PforR will support the building of the foundations of a modern social protection system and the extension of its coverage and will directly support Axes 1, 2, 3 and 4 of the National Social Nets Program (*PNPSNC* 2023-2032).

Once basic delivery systems are in place and social protection institutions have completed the transition to new systems, the government will initiate the scaling up of a flagship safety net program.

The proposed PforR operation will implement the following activities: Results Area 1: (i) regular cash transfers for chronically extremely poor households, (ii) shock responsive transfers for transient poverty and vulnerability to conflict and climate shocks (among others), (iii) financial inclusion and accompanying measures to build resilience, Results Area 2: (i) adoption of an interoperability and coordination framework, and development of a government data exchange platform to deliver social programs; (ii) rollout of the social registry (RSPM); (iii) construction of a Beneficiary Operations Management System (BOMS) for the flagship program; and (iv) implementation of a payment platform mapping unique identifiers, (v) building capacity for portfolio planning and multi-year public expenditure frameworks for social protection; and (vi) adopt and use a governance mechanism for key ministries to coordinate the implementation of social policy

The ASTRE PforR program will cover the entire Togolese territory on the strategic axis 1.

The ASTRE PforR is anchored at the Office of the President, with ANID being responsible for overall Program delivery and for coordinating with ANADEB and ATD to jointly deliver results as the three project implementing entities (PIEs). ANID is currently the implementing agency for the WURI Togo project and is responsible for the delivery of the Togo e-ID, the RSPM and a payment mapper. ANID has been designated by the Office of the President to coordinate the social protection and delivery systems. A Data Protection Authority (DPA) has been established under WURI and will play a key role in the use of personal data during data exchanges and the construction of the interoperable social information system under this PforR. The Ministry of Economy and Finance will ensure that resources are made available to the various agencies. The main positive social impacts of the PforR are the following: for cash transfers and financial inclusion, these are increased consumption and enhanced food security, better access to basic social services, the creation of IGAs for the household, the empowerment of women, social inclusion, the elimination of the feeling of exclusion of households, the exit of households from a state of vulnerability; for capacity building and setting up a management systems, these are the clear targeting of beneficiaries, the reduction or elimination of duplication, the optimization of the use of resources, the identification of beneficiaries, the efficiency of the social protection action, optimization of public spending and the improved coordination of policy action for social protection. The negative environmental impacts of these same activities include the destruction of flora by charcoal production activities and the cutting and sale of firewood, which are assessed as being of low importance. We also note the decrease in carbon sequestration capacity, which is also considered to be of low importance.

1. The implementation of the activities of this PforR may entail the following social risks: (i) risks related to the health and safety of consultants, beneficiaries during field meetings, trainers and others who are considered "project workers"; and (ii) risks related to SEA/SH may arise from power relations (hierarchy, positioning, economic advantages, etc) in the context of the proximity of the project to the beneficiaries and the proximity of female and male workers and workers and beneficiaries during targeting or other encounters. (iv) Risks related to the movement of beneficiaries, to collect their cash money from the counters provided for this purpose.

There could be land conflicts related to the use of arable land for IGAs; women beneficiaries of cash for IGAs form associations to demand arable land; this will put pressure from the landowners to pay for land due to the scarcity of arable land.

The program could develop a sense of frustration in the rural community (the ineligible), and thus exclusion. The ASTRE PforR Program may create social expectations that must be respected, as the household could become indebted while waiting for the benefits.

The legal framework for environmental protection in Togo has been progressively consolidated over the years based on the Constitution of the Togolese Republic. The present program will have little direct interaction with natural resources.

The actors involved in environmental management in this PforR: the Ministry of the Environment and Forest Resources through its main branches (central, regional and prefectural directorates) and attached establishments (National Environmental Management Agency and the Office of Forest Development and Exploitation). The National Environmental Management Agency (ANGE), which is attached to MERF, is responsible for "the promotion and implementation of the national environmental assessment system, particularly impact studies, strategic environmental assessments and environmental audits. In addition to these

two traditional environmental management bodies, this PforR will be implemented by ANID. The activities of this PforR will be carried out through the environmental assessment process, of which ANGE is the operational arm.

Togo has a legal corpus and an institutional arsenal to consider the environmental aspects of the activities of this PforR based the legal framework and the institutional arrangements of the current national system. At the institutional level: existence of a supervisory ministry (political will) that manages environmental issues, existence of an operational agency ANGE (provision of resources), existence of a procedure for managing undue impacts by projects. On the legal front: existence of a legal and regulatory framework.

The system's shortcomings include ANGE has very few resources and is not represented at the local level; there is incomplete implementation of overall management of environmental and social safeguards; ANID does not have an environmental and social safeguard team; there may be a failure to promote the legal texts governing protected areas at the local level; failure to apply the regulatory requirements of the labor code and to identify vulnerable persons.

The mitigation measures applicable to environmental risks and impacts are to: decentralize ANGE's services throughout Togo; strengthen the program's safeguard team within ANID; and monitor agricultural activities related to IGAs.

On the social level, the measures include supervising the use of land for agricultural IGAs; supervising beneficiaries on good practices of environmentally friendly livestock farming; setting up a framework for listening to and reporting risks related to EAS/HS; strengthening and disseminating the existing complaints management mechanism; providing and maintaining environmental, health and human resources skills throughout the implementation of the program; setting up systems for securing personal data and making targeting exhaustive with continuous updates.

SECTION I. PROGRAM DESCRIPTION

Introduction

A./ Country context

1. **The economic consequences of COVID-19, compounded by an overlapping climate and conflict crisis, have stalled Togo's steady progress in recent years and exacerbated budgetary pressures; although** it has enjoyed steady growth since 2008 (between 2008 and 2019), Togo's economic progress has slowed in 2020, with growth of only 1.8 percent. **In the face of fiscal pressures, bold reforms are needed to ensure inclusive growth.**

2. According to the latest 2018/19 household survey data, the per capita poverty rate using the national poverty line was 45.5 percent, and food poverty was even more prevalent at 52 percent.¹ The incidence of poverty is significantly higher in rural areas (58.7 percent, compared to 34.3 percent in urban areas). The war in Ukraine has led to an acceleration of inflation with disastrous consequences for the standard of living of the population, especially the poor.

3. **Togolese households face overlapping crises, leaving a large proportion of the population vulnerable to poverty.** Togo's high vulnerability to poverty is due to its population's exposure to shocks such as illness or death of a household member and, increasingly, to covariant shocks such as erratic rainfall, crop or animal diseases, and price inflation. To cope with the consequences of shocks, households resort to informal safety nets or negative coping strategies, which lead to asset depletion. An overwhelming proportion of individuals from single adult female households are vulnerable to poverty compared to their adult male counterparts (26 percent versus 13.5 percent, respectively).

4. **Climate change** (such as droughts, forest fires, and floods) **is a major factor in the vulnerability of households (working in agriculture) in rural and dry areas**, and Togo ranks 127th on adaptive capacity. In terms of preparedness, the country does particularly poorly in terms of social preparedness, including social inequality and education. Because of the country's vulnerabilities to climate change and low overall level of preparedness, the country ranks 129th out of 182 countries on climate vulnerability. Poor households are forced to skip meals and reduce access to services such as health care and education. Adult literacy rates and life expectancy are below the average for sub-Saharan Africa ²

5. **In addition, the country faces increased security problems in the northern part of the country.** It is estimated that more than 4,000 people have been displaced from their communities; this increased insecurity in the Savanes region will likely increase the vulnerabilities of a population that is already among the poorest in the country.

6. **Poverty reduction requires boosting human capital outcomes and building resilience to shocks.** There are three major constraints to sustainable poverty reduction and human capital formation that must be addressed: *(1) accelerating rural income growth, while closing gender gaps in access to productive opportunities and services, (2) building coordinated and shock-responsive systems to build resilience and stem vulnerability to poverty, and (3) investing in effective social protection delivery systems that incorporate financial sustainability into program design.*

¹Data are based on the Harmonized Household Living Conditions Survey (HHCS), 2018-19; food poverty is defined based on food expenditures below the national minimum food basket.

²Country Economic Memorandum 2.0 - Togo Country Scan, October 8, 2020.

B./ Sectoral (or multisectoral) and institutional context

Government's strategic vision and national development plan

7. **The proposed operation will directly support the Togolese government's new vision to accelerate development and economic growth by building resilience and prosperity for all Togolese.** This vision, reflected in the "Feuille de Route Gouvernementale Togo 2025" (FRGT 2025), includes three strategic objectives. The first of the three strategic objectives encompass "strengthening social inclusion and cohesion and guaranteeing peace", fighting inequality, vulnerability and insecurity through coordinated actions, improving human capital outcomes, through social protection, health and education.

Results Area 1 & Activities:

1: PforR ASTRE will support the government in deploying the flagship THE FLAGSHIP SAFETY NETS PROGRAM safety net program for the provision and coordination of:

- i. regular cash transfers for the extremely poor;
- ii. shock-responsive transfers for transient poverty and vulnerability to conflict and climate shocks;
- iii. women's financial inclusion, including savings accounts, and ;
- iv. support to the human capital through the accompanying measures for all beneficiaries.

Result Area 2 & Activities: PforR will help the government take advantage of recent innovations in delivery systems by establishing an interoperable social information system (SIIS) through:

- i. The adoption of an interoperability and coordination framework and the development of a government-wide data exchange platform to deliver social programs;
- ii. Deployment of the social register (RSPM) through universal outreach and dynamic intake and enrollment;
- iii. Building a Beneficiary Operations Management System (BOMS) for the flagship program;
- iv. the establishment of a payment platform mapping unique identifiers to bank and mobile money accounts for direct benefit transfers from the single Treasury account to designated recipients and;
- v. the establishment of a DataLab for evidence-based policymaking that leverages SIIS data and builds capacity for monitoring, evaluation, and analysis.

i. Strategic context of social protection

8. **Significant progress has been made in the social protection sector in Togo over the past decade, thanks to the government's strong commitment to laying the foundation for a social safety net³ system.** The first round of cash transfer programs (PDCplus, funded by UNICEF) was launched in 2014 as a limited pilot in the Savanes and Kara regions, to strengthen human capital, improving nutritional outcomes for children under five and to help increase their productive potential. In 2017, an ambitious safety net and basic

³Also sometimes called social assistance programs, safety nets are non-contributory benefits provided in cash or in kind to support poor and vulnerable people. They are part of broader social protection systems that include contributory social insurance such as pensions and health insurance, as well as labor market policies and programs. Safety net programs are designed to promote income-generating activities and create productive linkages within local economies. Safety nets also include measures that facilitate access to basic services such as health care, education, and housing through fee waivers and targeted scholarships, as well as lump sum grants to promote livelihoods and productive inclusion.

services project (FSB Project, P157038), improved access to basic services in 200 villages through building or rehabilitation of socio-economic infrastructure, such as classrooms, water points, health posts, and rural roads, and by expanding a poverty-targeted cash transfer program to more than **60,000 households**. The FSB project, and the Employment Opportunities for Vulnerable Youth - EJV project, were co-financed by the **Government of Togo** and **IDA**. The FSB project reached **60,568 poor households to date**, while the EJV project created more than 14,000 temporary employment opportunities for youth in the country's poorest communities. Following the pandemic, the FSB project was expanded with additional funding from IDA and the French Development Agency (AFD), adding over 125,000 new beneficiary households. Economic inclusion measures have been introduced in 2021 for 15,000 beneficiary households to increase incomes in a sustainable manner to recover from the negative impacts of COVID-19. The government has also launched a program to support families of pregnant women and newborns,⁴ WEZOU (which means "breath of life" in the Kabye language) with free medical services for poor and vulnerable women and expanded basic universal health insurance for poor and vulnerable populations, with the goal of covering 55 percent of the Togolese population by 2024.

9. In a turning point in the midst of the pandemic, the government implemented NOVISSI⁵, an internationally recognized emergency cash transfer program that made innovative use of new technologies and data to provide income support to 25% of the adult population, 63% of whom were women. With Novissi, the government created a new emergency program to provide temporary cash transfers to urban informal sector workers, the hardest hit by the crisis. Togo deployed both a low-tech and a high-tech method to prioritize social assistance in a data-poor environment. Compared to other feasible alternatives during the crisis, the dynamic data-driven approach reduced exclusion and inclusion errors. To provide effective assistance without physical contact, Novissi relied entirely on digital platforms using a simple USSD interface and mobile money, significantly innovating on existing safety net delivery systems in the country.

10. Beyond cash transfers and economic inclusion measures, the government has initiated the development of the basic elements of a social protection delivery system focused on the poorest households. A dynamic social registry-the "Social Registry of Persons and Households" (RSPM)-is currently being developed with support from the World Bank-funded West Africa Unique Identification for Regional Integration and Inclusion (WURI) program (P169594). An interoperability framework is being developed by the Togo Digital Transformation Agency (Agence Togo Digital, ATD). Through Novissi, partnerships have been established with mobile network operators to enable mobile money transfers to individuals. There are plans to develop a payment bridge system that links unique identifiers to a bank account or mobile money account, which would allow bundled payments for social protection programs to be credited from the Treasury's single account to individual accounts linked to the beneficiaries' unique identifier. Discussions are also underway on the development of a payment platform similar to TrésorPay in Côte d'Ivoire.⁶, These ongoing initiatives will provide

⁴<https://www.togofirst.com/en/health/2408-10475-wezou-initiative-over-1-3-billion-cfa-spent-and-200-000-beneficiaries-so-far>

⁵Novissi means solidarity in Ewe language. See

www.novissi.tg.gouv.tg; <https://www.worldbank.org/en/news/feature/2021/07/07/prioritizing-the-poorest-and-most-vulnerable-in-west-africa>; <https://www.worldbank.org/en/results/2021/04/13/prioritizing-the-poorest-and-most-vulnerable-in-west-africa-togo-s-novissi-platform-for-social-protection-use-machine-l>

⁶The electronic payment platform of the Ivory Coast government's Treasury Department (Trésor Pay) launched in 2021 processes all government payments, including local authorities. <https://documents1.worldbank.org/curated/en/443251602702930987/pdf/Disclosable-Restructuring-Paper-Enhancing-Government-Effectiveness-for-Improved-Public-Services-P164302.pdf>

a fundamental foundation for building a coherent and coordinated social protection system that enables productive inclusion and stimulates economic growth.

11. In response to these challenges, based on successful experiences and lessons learned from Novissi and the FSB project, the Government is committed to strengthening and reforming its social protection architecture, using Novissi as a platform to improve the delivery of social programs as they are delivered directly to people in a transparent and agile manner.

12. In this context, the proposed Togo ASTRE PforR is designed to support the Togolese government's efforts to achieve transformative change in social protection architecture and programming. The PforR supports the government's vision to increase pro-poor spending and coverage of social protection programs. The PforR is designed to support selected activities in the four axes of PNPSNC:

- (1) Novissi Plus Program
- (2) Resilience of populations to shocks
- (3) Modernization and strengthening of the non-contributory social protection system with an integrated social information system
- (4) Technical coordination and monitoring and evaluation

The support in these activities, the Togo ASTRE PforR would:

1) Build individual and household resilience to climate, conflict and other shocks by creating a package of savings incentives to help reduce reliance on negative coping strategies, deepening the inclusion of the poor in growth, and removing gender-related barriers and strengthen financial inclusion.⁷

2) Improve the effectiveness and institutional coordination of safety net programs by coordination between programs and investments;

3) Increase the capacity of implementing agencies for sustainable funding.

C Relationship to the CPS/CPF and rationale for use of the instrument

13. The proposed program aligns with the Togo 2017-2020 Country Partnership Framework (CPF), which has been extended to 2022. Objective 2.3 of the CPF's intervention area 2 ("Inclusive Public Service Delivery") is to "strengthen social safety nets for the most vulnerable," to which the proposed program and its ODP directly contribute. By strengthening the capacity of households to adapt to climate change, the operation further contributes to CPF intervention area 3 ("Environmental Sustainability and Resilience").

1.1.2. Objectives of the ESSA

2. The purpose of this Environmental and Social Systems Assessment is to review the environmental and social management systems applicable to the PforR Program to assess their compliance with the guidelines and provisions of the Bank's Policy on Economic Governance, Financing for Results (PforR).
3. The objective is to ensure that the Program does not carry high risks and will not generate significant environmental and social impacts, and that the mechanisms put in

⁸ Law No. 2019-014 of 29 October 2019 relative to the protection of personal data.

place at the national level allow for the identification and management of possible risks and impacts. In particular, ESSA identifies and analyzes the gaps that may exist between the national systems and the six (6) core E&S principles of the PforR applicable to the Program and recommends improvement actions aimed at the coherence of the national environmental and social management systems.

4. Finally, the ESSA aims to identify the strengths and weaknesses of the environmental and social systems specifically applicable to the proposed PforR in order to determine the actions needed to improve them. Specific actions to address the identified weaknesses or gaps are proposed in the action plan resulting from the ESSA, which is an integral part of the program action plan.

1.1.3. Methodology of the ESES

5. The coherence of programmatic systems is analyzed by ESES on the basis of two fundamental elements according to PforR policy:
 - Based on systems defined by laws, regulations or procedures ("the system as defined");
 - Based on the capacity of the institutions involved in the program to effectively implement the environmental and social management systems ("the system as it is applied in practice").
6. It involves screening all activities to be implemented in the PforR and national policies and regulations (laws, decrees, ordinances and orders) against the World Bank's six core environmental and social principles to identify risks and gaps, and then suggest opportunities to strengthen implementation. A review of the adequacy of existing institutional mechanisms for planning and monitoring the environmental and social aspects of the program is also conducted.
7. The review of the institutional, policy, and regulatory framework addressed the range of activities planned, the involvement of all stakeholders, the diversity of beneficiary needs and uses, cultural aspects, issues of accountability, transparency in targeting, and mechanisms for redress at all levels. The ESSA development process followed the steps below.
 - **Literature:** The review of policies, legal texts and program documents examined all national policies and legal requirements related to environmental and social management as they relate to the social safety net and basic services program activities. Technical and supervisory documents from previous and even ongoing World Bank social safety net projects and programs were also reviewed.
 - **Institutional Analysis:** An in-depth institutional analysis was conducted to identify the roles, responsibilities and structure of the relevant institutions involved in public administration in Togo.
 - **Stakeholder consultations and field visits:** A training session was held from February 21 to 24, 2023 on the World Bank's financing instrument for actors involved in social protection in Togo. Following this training, stakeholder consultation meetings were organized from February 27 to March 3, 2023, at the level of the program's implementing bodies (the national identification agency). In addition to these program implementers, Togolese state institutions involved in social and environmental protection were consulted. These were: the National Environmental Management Agency (ANGE), the Directorate of Social Protection, the Directorate of Social Action, the National Agency for Civil Protection and the beneficiaries of the ANADEB social safety nets and basic services project. also, Togolese Federation of Associations of Persons with Disabilities.

Following the consultations, an analysis of the data was conducted, and the potential environmental and social impacts/risks associated with the PforR were assessed at different levels to determine the level of significance of the potential risks and impacts, and then recommend corresponding mitigation measures to ensure that the implementation of the program is environmentally sound and socially acceptable.

8. Thus, the assessment describes the extent to which environmental and social policies, legislation, procedures, and institutional systems at the country level are consistent with the six "core environmental and social principles" of the World Bank's PforR policy.

In conclusion, the environmental and social systems assessment identifies and analyzes gaps that may exist between country systems and the basic environmental and social principles applicable to the program and recommends actions for improvement aimed at consistency of environmental and social protection systems, social compliance with World Bank PforR requirements.

1.1.4. Description of the scope and thematic boundaries of the Program

9. **The proposed PforR will support building the foundations of a modern social protection system and expanding its coverage.** It will finance the expansion of social protection through a flagship Social Safety Net Program.
10. **The proposed PforR will directly support Axes 1, 2, 3 and 4 of the National Social Nets Program (PNPSNC 2023-2032).** The role of the WBG/IDA will be to co-finance the Flagship, leveraging the transformation of their core delivery systems and building institutional capacity for a results-based approach to social policy financing. The scope of the program is presented in Figure 2 below, as defined in key government policy documents.
11. **Once basic delivery systems are in place and social protection institutions have completed the transition to these systems, the government will initiate the scaling up of a flagship safety net program.** By 2026, the social protection system will be ready for a radical expansion of its coverage using the new delivery platform and programmatic elements piloted in the first stage of implementation (2023-2025). It will be supported by increased funding for targeted social protection programs.¹
12. **The proposed PforR will support the implementation of the PNPSNC.** The scope of the government's program includes (i) the flagship cash transfer program for the chronically poor; (ii) crisis-responsive cash transfers for those affected by emergencies; (iii) the economic inclusion "package"; (iv) a cross-cutting delivery systems component that serves all social programs in Togo; and (v) a cross-cutting governance and capacity component
13. The PNPSNC has tentatively established the following key outcomes to be achieved for social nets: 1) Phase 1 (through 2025): Launch of the new flagship program and completion of the foundational investment in delivery systems 2) Phase 2 (through 2030): Expansion of the coverage of the flagship safety net program based on the completed modern delivery system. **The operation will support a reorientation of public spending toward more effective social protection spending.** The PforR will support the transition to the new social protection system with a greater role for the non-contributory social safety net pillar. The World Bank's role in financing this change will be significant at the beginning of the program, with the government's role increasing in the later years of the program.

1.1.5. Development goal (PDO) and outcome indicators at the PDO level

14. **The development objective of the PforR** is "to strengthen systems for coordinated, inclusive, efficient and productive safety nets.

15. *Enhance - this is the* improvement or development of new systems, platforms and existing processes to meet a particular need.

Systems-these are the "big S" social protection systems covering the three pillars of welfare, work, social insurance, and pensions-and (ii) the cross-cutting "small S" delivery systems, i.e., the dynamic social register (DSR), unique identifiers (e-ID), a payment platform, a beneficiary transaction management system, and a data exchange platform.

Coordinated-Refers to coordination mechanisms that enable synergies among key stakeholders and programs, reducing fragmentation and thereby improving the overall impact of interventions provided, for example, by bundling complementary benefits and services.

Understood-Refers to the scalable coverage of large "S's" and small "S's" in social protection systems, ensuring that the risks of exclusion are taken into account in the design of these systems and that a progressive universality approach is taken.

Efficient-Refers to the relationship between inputs and outputs, optimizing cost-benefit. Reduce the overall cost of providing social welfare programs.

Productive-Refers to the productive nature of the flagship program's interventions to improve the productivity and incomes of beneficiaries and put them on a path out of poverty. This is done through cash transfers that support consumption and a package of accompanying measures, including micro-entrepreneurship training, an additional grant to support the initiation or development of income-generating activities, and coaching and mentoring, all aimed at supporting intra-household economic activities and sustainable intra-household income generation

1.1.5.1. PDO Level Outcome Indicators

16. **The following draft outcome indicators are proposed to track the achievement of the PDO:**

17. **The following indicators are proposed to monitor the achievement of the PDO**

a. Increase coverage of The flagship safety nets program

- Beneficiaries of social safety net programs
- Beneficiaries of social safety net programs - female
- Expansion of coverage of households by The flagship safety nets program shock-responsive transfer in districts affected by a climate, conflict, health or other shock
- Direct female beneficiaries of The flagship safety nets program shock-responsive transfers
- Female The flagship safety nets program beneficiaries reached by mobile financial services;
- The flagship safety nets program beneficiaries reached by accompanying measures via mobile;
- Female The flagship safety nets program beneficiaries reached by accompanying measures via mobile

b. Strengthen delivery systems

- Share of poor population registered in RSPM;
- Interoperable social information system is operational with data exchange and analytics (Data Lab) capabilities.

1.1.6. Description of PforR activities

The proposed PforR operation will implement the following activities.

- **Result Area 1:** (i) regular cash transfers for chronic poverty, (ii) shock responsive transfers for transient poverty and vulnerability to conflict and climate shocks (among others), (iii) financial inclusion (such as savings) and accompanying measures such as messaging around health benefits and financial literacy.
- **Result Area 2:** (i) adoption of an interoperability and coordination framework, and development of a government data exchange platform package for delivering social programs; (ii) deployment of the social registry (RSPM); (iii) construction of a beneficiary operations management system (BOMS) for the flagship program; and (iv) implementation of a payment platform mapping unique identifiers, (v) strengthen capacity for portfolio planning and multi-year public expenditure frameworks; and (vi) adopt and use a governance mechanism for key ministries to coordinate the implementation of social policy.

1.1.6.1. Description of the geographical scope of the PforR program

18. The PforR Togo ASTRE will cover the entire Togolese territory on the strategic axis 1.

1.1.6.2. Differences in scope between the Borrower's program and the Bank-financed program

19. The Government of Togo (GoT) adopted a 2020-2025 strategic roadmap in October 2020 to modernize and strengthen its public sector to support improved service delivery. And the proposed THE FLAGSHIP SAFETY NETS PROGRAM PforR will directly support Axes 1, 2, 3 and 4 of the government's National Social Nets Program (PNPSNC 2023-2032). And the proposed THE FLAGSHIP SAFETY NETS PROGRAM PforR will directly support Axes 1, 2, 3, and 4 of the government's National Program for Non-Contributory Social Protection (PNPSNC 2023-2032). The WBG/IDA's role will be to co-finance the Flagship with productive inclusion measures, building institutional capacity for a results-based approach to social policy financing. The proposed PforR THE FLAGSHIP SAFETY NETS PROGRAM therefore supports part of the government program as shown in the following table:

Table 1a-b : Limitations of PforR interventions within the government program

Table 1a: Four axes of PNPSNC 2023-2033 and scope of PforR

Government Program	The Scope of the PforR
Axis 1 The Flagship Safety Nets Program	
Cash transfers	Included
Health insurance for poor and vulnerable households	Not included
Accompanying measures	Included
Energy access and digital inclusion	Not included
Axis 2 Resilience of populations to shocks	
Implementation of shock response mechanisms and protocols	Included

Government Program	The Scope of the PforR
Financial and in-kind support for households affected by shocks.	Included
Axis 3: Modernization and strengthening of the non-contributory social protection system with an integrated social information system	
Modernization of the non-contributory social protection sector	Not included
Strengthening of the Social Registry of Persons and Households (Identification, registration, targeting, updating of data)	Included
Establishment of an information system for entities responsible for implementing social assistance projects (sectoral information system)	Included
Development of a social protection innovation laboratory	Included
Axis 4 — Technical coordination and monitoring and evaluation	
Program Management and Coordination	Included
Reporting, Audits and Evaluation	Included
Communication, training, capacity building	Included

Table 1b: Government Program

Description	Government program
Objectives	To improve the socio-economic situation of targeted poor and vulnerable households while addressing gender gaps in incidence of poverty and financial inclusion within a framework of consolidation and innovation of non-contributory social protection in Togo.
Duration	2023 to 2033
Sub-programs (SPs)/ Results areas (RAs)	<p><u>Government's main axis of the program:</u></p> <p>Axis 1 – The flagship safety nets program Program</p> <ul style="list-style-type: none"> ♣ 1.1 Cash Transfers* ♣ 1.2 Health Insurance for poor and vulnerable households ♣ 1.3 Accompanying measures** ♣ 1.4 Energy access and digital inclusion <p>Axis 2 – Resilience of population to shocks</p> <ul style="list-style-type: none"> ♣ 2.1 Implementation of shock response mechanism and protocols* ♣ 2.2 Financial and in-kind support for households affected by shocks** <p>Axis 3 – Modernization of Social Protection through Integrated Social Information System</p> <ul style="list-style-type: none"> ♣ 3.1 Modernization of non-contributory social protection sector ♣ 3.2 Strengthening of social registry of persons and households ♣ 3.3 Establishment of information system for entities responsible for implementing social assistance projects ♣ 3.4 Development of a social protection innovation laboratory “Data Lab”

	<p>Axis 4 – Technical coordination, monitoring and evaluation</p> <ul style="list-style-type: none"> ♣ 4.1 Program Management and Coordination ♣ 4.2 Reporting, Audits and Evaluation ♣ 4.3 Communication, training, and capacity building
--	--

1.1.7. Institutional and Implementation Arrangements

1. **The ASTRE PforR is anchored at the Office of the President, with ANID being responsible for overall Program delivery and for coordinating with ANADEB and ATD to jointly deliver results as the three project implementing entities (PIEs).** See Figure 4 on institutional arrangements. ANID was designated by the Office of the President to coordinate social protection systems, as the focal point and lead agency for the ASTRE PforR. ANID is developing the government's program document, PNPSNC, and the safety net program, with inputs from other implementing agencies. ANID, being a nascent agency created in 2020, is being staffed to fulfill its various missions. To strengthen support to ANID, assessments were conducted to identify capacity gaps and required actions to strengthen the agencies concerned (see details in the PAP).

2. **ANID will act as an orchestrator, coordinating and collaborating with ANADEB, ATD and MEF, among others.** ANADEB has experience delivering the FSB cash transfer (IDA-financed) project which reached over 60,000 households in 2021, with a planned expansion to 125,000 households by the end of 2023 following which the FSB project will close. ANADEB's strengths are in managing a network of social workers on the ground who provide a face-to-face interface to FSB project beneficiaries and allowing for community mobilization for economic inclusion measures delivered to 10,000 beneficiaries. ANADEB is also implementing the COSO project for community driven development in the Savanes region. ATD has experience delivering the contactless Novissi emergency cash transfer program during the pandemic, delivering to 972,000 individuals as of August 2021. ATD's strengths are in developing platforms for efficient delivery of social programs. ATD is building interoperability and data exchange platforms for whole-of-government and digitalizing public service delivery. ANID will work closely with ANADEB and ATD to leverage their respective strengths and areas of expertise to deliver results on The flagship safety nets program. There is precedent for close coordination. ANADEB is currently working in partnership with ATD and ANID for the delivery of payments through mobile money accounts to beneficiaries of cash transfer for the FSB project in 2023, using the Novissi platform managed by ATD and issuance of temporary identification credentials by ANID for beneficiaries of cash transfers who do not have any. The three PIEs have regular coordination meetings around the delivery of cash transfers under the FSB project.

3. **Ensuring data protection and privacy is an essential part of the program, and one that all implicated institutional actors will have been attentive to; to that end, the GoT will operationalize its Data Protection Authority (DPA).** Togo has made significant strides in developing its data protection regime in recent years. In 2019, Togo promulgated its data protection law—a prerequisite to participating in the WURI program—which created its Data Protection Body (*Instance de protection des données à caractère personnel*, or IPDCP)⁸.

⁸ Law No. 2019-014 of 29 October 2019 relative to the protection of personal data.

However, while the IPDCP has been set-up⁹, it still remains to be fully operationalized, its members having yet to be appointed.

4. **Cybersecurity—the flip side of the data protection “coin”—also presents an important element to the program, both because all cash transfers and information will be delivered electronically.** In terms of institutional arrangements and capacity, the GoT has made progressed quickly in this area. In 2018, Togo both created and operationalized its National Agency for Cybersecurity (*Agence Nationale de la Cybersécurité*, or ANCy)¹⁰, and is responsible for ensuring cybersecurity of Togo’s ICT systems. In 2019, Togo operationalized its national cyber-incident response team (CIRT) and security operations center (SOC), Cyber Defense Africa SAS (CDA), through a joint-venture between the State and a private company.¹¹ ANID has been closely collaborating with ANCy, and both agencies have taken efforts to ensure the implementation of appropriate data protection measures. It is the Government’s intention that the IPDCP will oversee and regulate the institutional actors and allow for a more controlled deployment in projects dependent upon cyberspace. Such will be particularly important to the program in the context of ensuring secure and controlled data sharing, and will be all the more important given that all transfers to beneficiaries will be made electronically via smartphones, as well as to communicate with beneficiaries in their local languages.

5. **The ASTRE Program will interface primarily with ANID as the Project Implementing Entity responsible for delivering results, and the overall coordinator.** ANADEB may take on the role of program administrator for the flagship safety nets program and ATD may take on the role of platform development for the BOMS of the flagship safety nets program, the payments platform, and the interoperability platform.

6. **GoT will develop a Subsidiary Agreement between MEF and the three PIEs—ANID, ANADEB and ATD—to clarify roles and responsibilities, and to enable flow of funds and budget allocations from MEF to the agencies as advance payments, and to cover the cost of operations for the achievement of results.** Cash transfers under the flagship safety nets program will flow directly from the Treasury single account to the mobile money service providers who will pay into the registered mobile money accounts of beneficiaries linked to their unique identification number (eID). Therefore, while funds will not directly flow from MEF to any of the three PIEs for the cash transfer, MEF will be responsible for making the necessary allocations for administration and operations for the PIEs. Budget allocations will need to be made by MEF to ANADEB to support its operating cost of “face-to-face” beneficiary interface through community social workers, to enable outreach and communications about the program and continuous communications, to facilitate grievance redress, and to support the ongoing BOMS functions and administration of the BOMS system for The flagship safety nets program. Budget allocations will also need to be made by MEF to ANID to support the data collection for the RSPM, operation of the RSPM, operation of the BOMS system for The flagship safety nets program, the setting up of the Data Lab, an integrated grievance redress call center, as well as program coordination, management and communications. Budget allocations will need to be made by MEF to ATD to enable the development of various components of interoperable delivery systems and for the operations of the The flagship safety nets program BOMS platform.

⁹ Decree No. 2020-11/PR of 9 December 2020 on the organization and functioning of the Instance of Protection of Personal Data (IPDCP), establishing the IPDCP but requiring subsequent member appointment in order to become operational.

¹⁰ Decree No. 2019-22/PR of 13 February 2019 on the attributions, organization and functioning of the National Cybersecurity Agency (ANCy).

¹¹ World Bank; United Nations. 2023. *Combatting Cybercrime: Tools and Capacity Building for Emerging Economies*. Washington, DC: World Bank Group

SECTION II. DESCRIPTION OF EXPECTED PROGRAM ENVIRONMENTAL AND SOCIAL EFFECTS

2.1. Environmental and social benefits of the PforR Togo ASTRE

2.1.1. Key environmental benefits of the program

The lack of food resources leads households, especially in rural areas, to engage in activities that impact the environment. Such activities include charcoal production, cutting and selling firewood. THE FLAGSHIP SAFETY NETS PROGRAM activities could therefore reduce or even eliminate these environmentally devastating activities by reducing the cutting of wood to find means of subsistence.

Elsewhere, the secondary effect of a social safety net led to reducing deforestation (Pakistan). In Indonesia, for example, Ferraro and Simorangkir 69 estimate that in about 7,500 forest villages, conditional cash transfers from the Keluarga Harapan Program (PKH or "Family Hopes Program") have reduced forest cover loss by 30%,

This effect was observed because households with direct access to cash transfers turned away from the original sources of fuel (forest), although this program had not directly focused on preserving the natural source of livelihoods. In addition, the program proved even more effective in reducing deforestation in communities that had better access to markets.

The PforR Togo ASTRE program does not foresee any acquisition of equipment (electrical and electronic), and therefore will not generate any additional impact related to the operation of this equipment.

2.1.2. Key Program Benefits

The PforR Togo ASTRE program will contribute to the emergence of good practices of social and financial inclusion in some beneficiary households. The beneficiaries, in the perspective of a rational use of the resources will receive training and messages through their phones, leading in the long term to better management of their financial resources helping them to achieve their financial autonomy. They will also be able to learn how to use the telephone and the payment mechanism of the allowances through financial literacy classes; the possibility for the beneficiaries to become incentivized to access to basic social services (schooling of the children, access to health care, vaccination of the children, access to a healthy food, declaration to the civil status, establishment of administrative documents, hygiene, ...)

Cash transfers allow beneficiaries to create/expand agricultural plots (banana, corn, cassava, yam, peanut, tomato, bean...) when the climate allows it; also the creation of pens for the breeding of poultry, pigs, sheep, goats; the initiation of small businesses and various income-generating activities (sale of adulterated fuel, production and sale of charcoal, vegetables, cakes or other foods, preparation and sale of local drinks...).

Togo ASTRE will lead beneficiaries to establish the necessary documents for obtaining cash transfers: establishment of administrative documents (CNI, identity certificates and birth certificates); schooling of children and access to health care for household members (payment of medical prescriptions); participation of beneficiaries in solidarity actions and strengthening of social cohesion through community activities, including contributions to support infrastructure rehabilitation (school roofing, etc.); familiarization for some with communication instruments (telephone number), a driver of financial inclusion; participation of beneficiaries in community life (meetings, decision-making, etc.). The participation of beneficiaries in community life (meetings, decision making, etc.), these elements contribute to a strong social inclusion of beneficiaries and especially contribute to the empowerment of women (strong involvement in decision making in the household). The perception of female beneficiaries in the household and male beneficiaries in the community (the beneficiaries may wish to reposition themselves in the household and in the community) is good.

Cash transfers help increase the capacity of households to cope with shocks.

These potential impacts are in line with the World Bank's 2014 social safety net impact study, "Reducing Poverty and Investing in Human Capital: The New Role of Social Safety Nets in Africa." This study finds that social safety net programs contribute to poverty reduction in several ways. Impact evaluations have shown that these schemes allow households to meet their basic needs, preserve their income-generating assets (such as livestock), and invest in their children's education and health. Cash for those exposed to shocks including conflict-related shocks reduces the sense of exclusion among victims and allows them to move out of a state of temporary vulnerability. The following table highlights the main positive social impacts of the program.

Table 2 Positive social impacts of the PforR program

Results Areas	Types of activities	Description of activities	Main social benefits
RA 1	Cash transfers	Regular cash transfers for chronic poverty	<ul style="list-style-type: none"> Increasing access to basic social services; Empowerment of women; Social inclusion
	Acompanying Measures	Resilience measures such as messaging on financial literacy and health benefits	
	Financial inclusion measures	Creation of mobile savings)	<ul style="list-style-type: none"> Promotion of formal banking, enhancement of savings, and increasing opportunities for investing Empowerment of women Promoting social and financial inclusion
	Shock response mechanisms and protocols	<ul style="list-style-type: none"> Adoption of methodology for The flagship safety 	<ul style="list-style-type: none"> Removes the feeling of exclusion from households

Results Areas	Types of activities	Description of activities	Main social benefits
	Financial support to people affected by shock	nets program shock-responsive transfers <ul style="list-style-type: none"> Shock-responsive transfers for transient poverty and vulnerability to conflict and climate shocks. 	<ul style="list-style-type: none"> Moving households out of a state of vulnerability.
RA 2	Strengthening social registry	<ul style="list-style-type: none"> Adoption of an interoperability and coordination framework, and the development of a set of government data exchange platform to deliver social programs. Deployment of the social register (RSPM); the construction of a Beneficiary Operations Management System (BOMS). Implementation of a payment platform mapping unique identifiers. Implementation of a payment platform mapping unique identifiers. 	<ul style="list-style-type: none"> Clear targeting of beneficiaries; Reduce or eliminate duplication ; Optimize the use of resources Identification of beneficiaries Avoiding multiple benefits Making social protection work effectively
	Establishing information system for entities responsible for implementing social assistance projects		
	Development of "Data Lab"		
	Program management and coordination		
	Reporting, audits, and evaluation		
	Communication, training, capacity building	<ul style="list-style-type: none"> Build capacity for portfolio planning and multi-year public expenditure frameworks. Adopt and use a governance mechanism for key ministries to coordinate the implementation of social policy. 	<ul style="list-style-type: none"> Optimization of public spending. Coordination of social policy, action and protection

2.2. Environmental and social risks and negative impacts of the PforR Togo ASTRE

2.2.1. Main environmental risks and negative impacts of the PforR Togo ASTRE

The environmental risks of the Program's activities will be related to (i) IGA activities implemented by the beneficiaries, (ii) the meeting periods (awareness training).

Main risks and negative environmental impacts of the PforR program Togo ASTRE

Results Areas	Types of activities	Description of Activities	Main environmental risk/impacts	Level of risk
RA 1	Cash transfers	<ul style="list-style-type: none"> Regular cash transfers for chronic poverty; Resilience measures such as video and text messaging on financial literacy and health benefits Creation of mobile savings) Adoption of methodology for The flagship safety nets program shock-responsive transfers Shock-responsive transfers for transient poverty and vulnerability to conflict and climate shocks. 	<ul style="list-style-type: none"> Destruction of the flora by charcoal production activities, cutting and sale of firewood. Decrease in carbon sequestration capacity 	Low risk
	Acompanying Measures			
	Financial inclusion measures			
	Shock response mechanisms and protocols			
	Financial support to people affected by shock			
RA 2	Strengthening social registry	<ul style="list-style-type: none"> Adoption of an interoperability and coordination framework, and the development of a set of government data exchange platform to deliver social programs Deployment of the social register (RSPM) the construction of a Beneficiary Operations Management System (BOMS) Implementation of a payment platform 		
	Establishing information system for entities responsible for implementing social assistance projects			
	Development of "Data Lab"			
	Program management and coordination			
	Reporting, audits, and evaluation			
	Communication, training, capacity building			

Results Areas	Types of activities	Description of Activities	Main environmental risk/impacts	Level of risk
		mapping unique identifiers <ul style="list-style-type: none"> • Implementation of a payment platform mapping unique identifiers • Build capacity for portfolio planning and multi-year public expenditure frameworks • Adopt and use a governance mechanism for key ministries to coordinate the implementation of social policy 		

2.2.2. Main social risks and negative impacts of the program

The implementation of the activities of this PforR may entail the following social risks:

(i) risks related to the health and safety of consultants, beneficiaries during field meetings, trainers, and others who are considered "project workers"; and (ii) risks related to SEA/SH may arise from power relations (hierarchy, positioning, economic advantages, etc.) in the context of the proximity of female and male workers and beneficiaries during targeting process or other meetings.](iii) risks related to beneficiaries' travel to collect their allowances

The program could develop a sense of frustration in the rural community (the ineligible), and therefore exclusion;

The **PforR Togo ASTRE** program is a **social expectation** creation **that must be respected** because while waiting for the benefits, the household could get into debt. The following table presents the negative social impacts and associated risks of the project.

Table 3 Main risks and negative social impacts of the program

Results Areas	Types of activities	Description of Activities	Main social risk/impact	Level of risk
RA 1	Cash transfers	<ul style="list-style-type: none"> • Regular cash transfers for chronic poverty. 	Risk of exclusion of households (feeling of exclusion). <ul style="list-style-type: none"> • Gender-based violence (GBV) • SEA/SH 	Moderate risk

Results Areas	Types of activities	Description of Activities	Main social risk/impact	Level of risk
		<ul style="list-style-type: none"> Shock-responsive transfers for transient poverty and vulnerability to conflict and climate shocks. 	<ul style="list-style-type: none"> Risk of household debt; Network coverage not total Risk of road accidents. Loss of cash received. Delays on transfer information. Non-receipt of transfer Non availability of cash in the receiving agency. Increased marital conflicts related to cash management in the household Transmission covid19 	Low risk
			<ul style="list-style-type: none"> Health and safety (Transmission covid19; risk of commuting accidents) SEA/SH GBV 	
	Financial and accompanying measures	<ul style="list-style-type: none"> Creation of mobile savings Resilience measures such as video and text messaging on financial literacy and health benefits 	<ul style="list-style-type: none"> Health and safety risks for consultants, field validators, supervisors, trainers and others who are considered "project workers" 	
RA 2	Establishing information system for entities responsible for implementing social assistance projects	<ul style="list-style-type: none"> Adoption of an interoperability and coordination framework, and the development of a set of government data exchange 	<ul style="list-style-type: none"> Risk exposure of personal data; 	Moderate Risk
	Development of "Data Lab"		<ul style="list-style-type: none"> Data loss Risk of household exclusion SEA/SH Risk of rejection or resistance to innovative measures. 	Low Risk

Results Areas	Types of activities	Description of Activities	Main social risk/impact	Level of risk
	<div>Program management and coordination</div> <div>Reporting, audits, and evaluation</div> <div>Communication, training, capacity building</div>	<p>platform to deliver social programs.</p> <ul style="list-style-type: none"> • Deployment of the social register (RSPM); the construction of a Beneficiary Operations Management System (BOMS). • Implementation of a payment platform mapping unique identifiers. • Implementation of a payment platform mapping unique identifiers. • Build capacity for portfolio planning and multi-year public expenditure frameworks. • Adopt and use a governance mechanism for key ministries to coordinate the implementation of social policy. 		

SECTION III. ASSESSMENT OF THE BORROWER'S ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEMS

3.1 Environmental management system

As part of the global dynamic in favor of the protection of human health and the environment initiated by the Rio Conference in 1992, which adopted Agenda 21, Togo undertook to consolidate its interventions in the field of the environment by adopting for the first time in 1998 a national environmental policy (NEP). Over the years, and especially since 2010, Togo has adopted various policies and strategies on the environment and forest resources, including land use planning, biodiversity conservation and climate change. In addition to the national environmental policy, the Government of Togo has developed several policy and strategic planning documents related to different environmental components. The legal framework for environmental protection in Togo has been progressively consolidated over the years based on the Constitution of the Togolese Republic. The present program will have little direct interaction with natural resources.

3.1.1. National legal framework for environmental management

The Constitution of the Fourth Togolese Republic constitutes the legal basis for environmental action in Togo. Based on the constitutional provisions relating to the environment, the legal framework is constituted by (03) main laws that have allowed the internalization of the various multilateral agreements on the environment in the national legal corpus. These laws are Law No. 2008-005 of May 30, 2008 on the framework law on the environment; Law No. 2008-009 of June 19, 2008 on the forestry code; and Law No. 2009-001 of January 6, 2009 on the prevention of biotechnological risks. In addition to these three environmental laws, there are several other complementary legislative texts that form a legal corpus for environmental management. The following table illustrates the links between this legal corpus and the PforR Togo ASTRE program.

Table 4 Summary of key environmental legislation related to the PForR Togo ASTRE

Legal texts	Strengths/linkages/relevance and fit with the program
The Constitution of the IV ^{ème} Togolese Republic adopted by referendum on September 27, 1992, promulgated on October 14, 1992 and revised by law n°2002-029 of December 31, 2002.	This law recognizes the right to a "healthy environment" for everyone living in the national territory and assigns to the State the duty/responsibility to protect the environment (Article 41). Article 84, the law establishes rules concerning: the protection and promotion of the environment and the conservation of natural resources; - the creation, extension and declassification of national parks, wildlife reserves and classified forests. This law is in perfect harmony with the fundamental principles of this PforR.
law n°2008-005 of May 30, 2008 on the framework law on the environment	The framework law and its application texts promote the assessment of environmental impacts and risks of PforR Togo ASTRE activities. Article 1 of this law states the need for preservation and rational management of the environment on the basis of the fundamental principles of international environmental law. Article 5 of the framework law establishes the basic principles for the preservation and management of the environment. Measures to protect the environment and avoid degradation of any component of the environment must be implemented to ensure the sustainability of the project.

Legal texts	Strengths/linkages/relevance and fit with the program
<i>Decree No. 2017-040/PR of March 23, 2017 establishing the procedure for environmental and social impact studies.</i>	This decree is in line with the fundamental principles of the PforR in terms of environmental protection; on the basis of this decree, it will be necessary to submit the activities of the PforR's IGAs to screening to determine whether they should be subject to an environmental and social assessment.

3.1.2. Environmental management procedures

If an IGA activity should be subject to environmental assessment, a procedure under Togo's regulations describes the administrative process for identifying, assessing, and managing environmental impacts, as well as for preliminary assessment, scoping, Environmental Assessment, Environmental Management Plan, compliance monitoring, and enforcement. This administrative process is set out in Order No. 013_MERF regulating the procedure, methodology and content of Environmental Impact Assessments (EIA) and also provides for external and independent reviews of the study. These external interventions can affect all stages of the process, namely the preliminary assessment, scoping, evaluation of the Environmental Assessment report, the Environmental Management Plan, compliance monitoring and enforcement.

3.1.3. Institutional arrangement of environmental management of this PforR

Togo ASTRE

The actors involved in the management of the environment in this PforR: the Ministry of the Environment and Forest Resources through its main branches (central, regional and prefectural directorates) and attached establishments (National Agency for Environmental Management and the Office for the Development and Exploitation of Forests). In accordance with Law No. 2008-005 of May 30, 2008 on the framework law on the environment in Togo, in particular Article 10, "the implementation of the national environmental policy is ensured by the ministry in charge of the environment in relation with the other ministries and institutions concerned. The National Environmental Management Agency (ANGE) is an agency attached to MERF and was created by Article 15 of the framework law on the environment. It ensures *"the promotion and implementation of the national system of environmental assessments, in particular impact studies, strategic environmental assessments and environmental audits.* In addition to these two traditional environmental management bodies, this PforR will be implemented by ANID, ATD and ANADEB. The activities of this PforR will be carried out through the environmental assessment process, of which ANGE is the operational arm.

Table 5 Institutional actors involved in the environmental protection of the PforR.

Structures	Administrative duties	Specific roles within the governance PforR program framework
National Identification Agency ANID	The ASTRE PforR is anchored at the Office of the President, with ANID being responsible for overall Program delivery and for coordinating with ANADEB and ATD to jointly deliver results as the three project implementing entities (PIEs). As a PIE, ANID will be responsible for the overall implementation of the PforR and will coordinate the work of the Agence Togo Digital (ATD) and the Agence Nationale d'Appui au Développement à la Base (ANADEB). ANID is currently the implementing agency for the WURI Togo project and is responsible for the delivery of the Togo e-ID, the RSPM and a payment mapper.	<p>This group will identify the beneficiaries' IGA activities, in accordance with the principles of the PforR; then submit its activities to ANGE for analysis.</p> <p>Similarly, these three structures will ensure the implementation of the environmental and social measures recommended in the Pfor R Togo ASTRE action plan.</p>
Togo Digital Agency ATD	As a PIE, ATD strengthens government-wide interoperability and data exchange and the digitization of public service delivery. It is also the custodian of the Novissi platform.	
National Agency for Grassroots Development Support ANADEB	As a PIE, ANADEB is currently the implementing agency for the FSB and has developed strong capacity in the delivery of cash transfers and economic inclusion measures. ANADEB works in partnership with ATD and ANID to deliver payments via mobile money accounts to cash transfer recipients under the BSF.	
National Agency for Environmental Management	<p>It was created by the framework law on the environment of May 30, 2008 and organized by decree n°2009-090 /PR of April 22, 2009.</p> <p>Article 15 of the law entrusts ANGE with: <i>"the promotion and implementation of the national system of environmental assessments, including impact studies, strategic environmental assessments, and environmental audits."</i></p>	<p>ANGE, in collaboration with the structures implementing the activities of this PforR, will carry out the environmental and social screening of the activities and propose the types of evaluation that will result from the environmental screening.</p> <p>Depending on the type of environmental and social assessment, ANGE will coordinate the monitoring and oversight of environmental and social measures during the implementation of this PforR.</p> <p>Similarly, it will monitor and control the implementation of the PMU specifications, including the environmental and social measures recommended in the ASTRE Program action plan.</p>

3.1.4. Environmental performance

3.1.4.1 Analysis of the environmental management system

Togo has a legal corpus and an institutional arsenal to take into account the environmental aspects of the activities of this PforR with regard to the description of the legal framework and the institutional arrangements of the current national system. This is reflected in the following strengths:

On the institutional level

- Existence of a supervisory ministry (political will) that manages environmental issues;
- Existence of an operational agency ANGE (provision of resources);
- Existence of a procedure for managing undue impacts by projects.

On the legal front,

- Existence of a legal and regulatory framework

The legislative framework for the management and protection of the environment is defined by Law No. 2008-005 of May 30, 2008 on the framework law on the environment. Article 1 states that the framework law on the environment sets the general legal framework for environmental management in Togo and aims to preserve and manage the environment in a sustainable manner. This regulatory provision can therefore allow the environmental and social aspects of this PforR to be taken into account, since this is in line with the PforR's fundamental principle No. 1, which states that "The E&S management system is designed to (a) promote E&S sustainability in program design; (b) avoid, minimize, or mitigate negative impacts; and (c) promote informed decision-making regarding the E&S effects of a program." In short, Togo has a legal, legislative and regulatory framework that can take into account environmental protection in the implementation of the PforR, however, there are significant gaps and constraints with respect to these frameworks.

Constraints at the institutional level: At the institutional level, the following constraints hinder the implementation of environmental protection strategies in Togo. These are :

- Insufficient coordination and synergy between the various actors involved in environmental management;
- The inadequacy of the current structures of the Ministry in charge of the environment and their weak capacity in material, human and financial means;
- The delay in setting up the National Commission for Sustainable Development;
- Unavailability of reliable environmental data;
- Weak capacity of institutions, the public and private sectors, local communities and other development organizations;
- The slow pace of the ongoing decentralization process;
- The absence of a permanent technical structure for the coordination and monitoring-evaluation of intersectoral and inter-institutional management of the environment;
- The non-accountability of ministerial departments and sectoral structures in the management of the environment.

It should also be noted that the financial, material, and human resources made available to the Ministry in charge of the environment have not been commensurate with the importance of the missions assigned to it. Although there are ANGE focal points in the prefectures of Togo, the services concerned with environmental assessments are centered in its headquarters in Lomé.

The organization of workshops to validate environmental and social impact study reports and issue environmental compliance certificates is slow.

Legal and regulatory constraints:

It should be noted that this legislative and regulatory framework relating to environmental management, to which must be added the treaties and conventions that Togo has signed, is varied and is characterized by

- the constraints of application of the environmental management texts and the insufficiencies noted in their formulation,
- their poor dissemination to the general public, public and private institutions/civil society,
- The inapplication of the legislative and regulatory provisions in force, especially with regard to the management of land resources, with the major concern being the difficulty of reconciling customary management and administrative management,
- Insufficiency of the texts of application of the law N° 2008-005 of May 30, 2008 Portant-cadre law on the environment and the various existing laws,
- Low level of implementation of environmental conventions,

3.1.4.2 Environmental Management Capacity

Capacity in terms of work mechanisms, experience and technical skills

Created by Law No. 2008-005 of May 30, 2008 on the framework law on the environment, the ANGE is a public institution with legal personality and financial autonomy and is responsible for *"supporting the implementation of national environmental policy as defined by the government under the National Development Plan (NDP)"*.

It ensures the steering of the integration of the environment in actions, projects, programs, plans and national and local policies through special tools of environmental assessment, environmental information, awareness and through documents such as guides. ANGE in its missions of regulation and public information on environmental issues.

ANGE relies on the expertise of national and international consultants for environmental assessments

Capacity in terms of availability of human resources

ANGE's human resources are insufficient given the importance of its mission. It relies mostly on trainees from schools and universities.

Capacity in terms of availability of financial resources

The financial resources made available for the operation of ANGE are insufficient for its mission.

3.1.4.3. Capacities of other institutions involved in the PforR Togo ASTRE

❖ ANID

ANID, being a fledgling organization, is in the process of being staffed to fulfill its various missions. ANID is the agency that is currently preparing the fundamental unique identification (e-ID Togo), the payment mapper and the emerging dynamic social register (RSPM). This agency has experience in the management of Bank-financed programs and therefore of the safeguard aspects according to World Bank principles.

❖ **ATD**

ATD is also an emerging organization that piloted the NOVISSI program during the COVID 19 pandemic in Togo. After the declaration of the state of emergency by the President of the Republic on April 1, 2020, the NOVISSI platform was launched on April 8, 2020 by the Togolese State for monetary transfer. ATD, as part of the NOVISSI program, has been able to set up a GRM. The agency had provided a call center and a view with the list of registrations to provide teleoperators with elements to respond to complaints about eligibility; however, this agency does not have experience on environmental and social aspects according to the requirements of the World Bank.

❖ **ANADEB**

ANADEB has specialists in environmental and social safeguards who accompany it in the implementation of its projects. They are :

- A specialist in environmental protection
- A specialist in social safeguarding
- Two assistants to the environmental safeguard specialist
- Two assistants to the social safeguard specialist

ANADEB has experience in environmental and social safeguards on projects of the World Bank and other donors. ANADEB's safeguard team has developed environmental and social safeguard instruments for World Bank projects. These are:

- Preparation of strategic documents: 2 CGES, 2 CPR for the EJV and FSB projects and 1 CGES (updated) for the FA-FSB project
- Development of PEES, CGES, CPR, PMPP and PGMO for the Social cohesion of the northern regions of the Gulf of Guinea project (COSO)
- Environmental and social screening of sub-projects and IGAs
- Development and implementation of operational ESMPs and RMPs for the EJV and FSB microprojects
- Preparation of quarterly and annual reports on the implementation of the CGES, CPR, PEES, etc.
- Carrying out the environmental and social audit of the implementation of CGES and CPR of the EJV and FSB projects
- Elaboration and implementation of ESMPs and RMPs for COSO project sub-projects
- Development and implementation of Complaint Management Mechanisms (CMMs)
- Elaboration and monitoring of the application of codes of conduct

The choice of ANADEB as one of the project implementation entities for this PforR will allow other agencies to benefit from feedback on projects financed by the World Bank, especially with regard to environmental and social safeguards. ANADEB had already developed experience in the management of labor-intensive public works projects along the lines of those of the PDC and PDCplus, and was responsible for the implementation of the IDA-supported Safety Nets and Basic Services Project (SNBSP) (P157038), with which this project shared the approach and methodology of grassroots management training for capacity building of targeted beneficiary communities. The implementation of the project by ANADEB thus ensured coherence and coordination with the SNBSP as well as synergies between the technical staff

in charge of the projects. ANADEB has also implemented Employment Opportunities for Vulnerable Youth Project (P157036) with a Satisfactory performance¹² in April 2022.

3.2. Social management system

3.2.1. National legal framework for social management

The legal framework for social protection in relation to the NONVISSI+ PforR is summarized in the table below.

Table 6 Legal and regulatory texts on social management

Legal texts	Strengths/linkages/relevance and fit with the program
The Constitution of the Fourth Republic	The Constitution of the Fourth Republic was adopted by popular referendum on 27 September 1992 and promulgated by the President of the Republic on 14 October 1992. It was revised by law n° 2002-029 of 31 December 2002. In its current content, it has provisions relating to the rights of disabled people. Firstly, through its preamble, the Togolese constitution endorses the provisions contained in the Universal Declaration of Human Rights of 10 November 1948 and all that can be drawn from it. 5 Constitution of 14 October 1992 revised by law n° 2002-029 of 31 December 2002. 8 Then, article 33 of this constitution states that "the State shall take measures to protect disabled persons from social injustice".
Law N°2011-006 of February 21, 2011 on the social security code in Togo	THE FLAGSHIP SAFETY NETS PROGRAM will have to take into account the provisions of this law by putting a particular emphasis on the following points: <ul style="list-style-type: none"> - Enroll and report all Program workers in the Fund; and - To declare to the Fund, within three (03) working days, any work accident suffered by the workers.
New labor code in Togo adopted by the National Assembly on December 29, 2020 to replace the old one carried by the Law n°2006-010 of December 13, 2006.	The following provisions must be observed in the implementation of PforR The flagship safety nets program activities. These are: <ul style="list-style-type: none"> - The hiring of any worker of Togolese nationality by signing a written contract; - the recruitment of a foreign worker upon presentation of an employment authorization and signature of a written employment contract; - The general obligation of safety training for all its workers; - The obligation to contract a physician-labor inspector to carry out pre-employment visits of workers, periodic visits, return-to-work visits and annual visits; - The obligation to subscribe to an insurance contract covering the risks related to illness and non-occupational accidents for the benefit of its workers; The implementation of health and safety measures during meetings and training sessions.
law n°2008-005 of May 30, 2008 on the framework law on the environment	When implementing certain IGA activities, the flagship safety nets program will need to involve all stakeholders and take their concerns into account.

¹² Implementation Completion and Results report (IDA, D1740-TG), April 2022. Report No: ICR00005894

Legal texts	Strengths/linkages/relevance and fit with the program
Law n° 2004-005 of April 23, 2004 on the social protection of disabled persons	Article 3: The disabled person has the right to life and development like any other person. Article 4: In accordance with article 33 of the Constitution, the State, local authorities and public or private legal entities shall prohibit all discrimination based on disability and shall guarantee to persons with disabilities equal and effective legal protection against any discrimination, regardless of the grounds, and shall take or cause to be taken measures in favor of persons with disabilities that are likely to protect them from social injustice. Article 5: Families shall ensure that persons with disabilities, with the help of the State, local authorities, and public or private legal entities, have their needs met and the autonomy necessary for their development. The NONVISSI+ Program in its targeting will have to take into account these provisions.
Law n°2007-017 of July 6, 2007 on the Child Code in Togo	The purpose of this Act is to protect and promote the rights of the child. Chapter 4 of Section 3 of the Act deals with the protection of the working child. Articles 262 to 266 deal with the modalities of child labor and the worst forms of labor. Children over fifteen (15) years of age may perform light work, the list of which is determined by order of the Minister of Labor after consultation with the National Labor Council. This order specifies the conditions under which the said work may be performed. As part of the implementation of this NONVISSI+ PforR, the modalities of child labor in IGAs will be documented in the labor management procedures.
Law n°2015-010 of November 24, 2015 on the new Penal Code	The provisions of this law criminalize discrimination and violence against women and girls. The GBV/HS/VEC aspects of the NONVISSI+ PforR will be governed by this law and its application texts. This law includes section 5/sexual harassment, especially articles 399 and 400, as well as article 889, which defines sexual harassment and the related penalties. Having taken into account the aspects related to GBV and SEA/HS in the program's risk assessment, the actors involved in the implementation of this PforR must comply with the provisions of this law when carrying out their activities.
Law n° 2012-014 of July 6, 2012 on the Code of Persons and Family	This law and its application texts consecrate the equality between men and women in their matrimonial relationship and in the exercise of parental authority. It also enshrines equal inheritance rights between men and women, girls and boys. Gender being at the heart of this PforR NONVISSI+, it must preserve the provisions of this law.
National Action Plan for the Involvement of Togolese Women in Conflict Resolution and Peacebuilding: Strategies for the Implementation of United Nations Security Council Resolutions 1325 and 1820	The objective of this action plan is to increase women's participation at all levels of decision-making, especially in the prevention, management and resolution of conflicts and peace building. This plan, which takes into account GBV and EAS/HS, is in line with the fundamental principles of the PforR NONVISSI+. Taking into account GBV/ECV and SEA/HS in the framework of the PforR activities will contribute to the achievement of the objectives of the National Action Plan for the Involvement of Togolese Women in Conflict Resolution and Peacebuilding.

Legal texts	Strengths/linkages/relevance and fit with the program
Law No. 2020-007 of June 26, 2020 on school feeding	The purpose of this law is to guarantee, in the long term, that every student in basic education, especially those in the most vulnerable areas, has access to sufficient and balanced school food and to promote the development of local production. The Program will have to take into account the provisions of this law in targeting the beneficiaries.
The law instituting universal health insurance in Togo.	The law on universal health insurance responds to a cardinal social principle set out in Article 1 of the Togolese Constitution, which states that the Togolese Republic is a state governed by social law. It guarantees access to quality health care for all segments of the population, through a mechanism of risk pooling and solidarity in financing. The targeting of beneficiaries in the NONVISSI+ PforR should integrate these provisions.

3.2.2 Institutional arrangement for social protection

The social protection system is managed by a set of institutions in Togo. They are :

❖ Social Protection Directorate

The social protection architecture is organized around the General Directorate of Social Protection, the national structure responsible for coordinating the implementation of social protection actions.

❖ National Committee for the Promotion of Social Protection (CNPPS)

The CNPPS was created in 2013 to serve as a framework for consultation on all social protection actions. It is composed of 32 members representing key technical ministries, social partners, TFPs and NGOs involved in the theme. These members work on an ad hoc basis. It is decentralized to all regions of the country.

❖ National Agency for Civil Protection

The Togolese government has created the National Agency for Civil Protection (ANPC) by Decree No. 02017- 011/PR of January 31, 2017. This, in order to protect the populations facing the recurrence of disasters due to human and natural factors, and for an efficient fight against climate change, TOGO has equipped itself with an effective steering mechanism in line with international standards and mechanisms as well as recommendations of sub-regional organizations.

3.2.3.1. Institutional anchoring of social protection schemes and programs

✓ Trusteeship of contributory plans

The Ministries of Labour, Finance and Health are responsible for the supervision of contributory schemes under the following conditions set out in the texts:

- ☞ The Ministry of Labor is responsible for the technical supervision of the general social security system managed by the CNSS and the health insurance system managed by the INAM;
- ☞ The Ministry of Health, like the Ministry of Social Action, participates in the supervisory board of INAM;

- ✎ The Ministry of Finance is responsible for the financial supervision of all schemes, including the individual accident/workplace insurance scheme, the management of which is delegated to a private insurance company.

✓ **Trusteeship of non-contributing programs**

The non-contributory programs fall under the ministries in charge of health (13 free and subsidized health care programs), labor (one labor market program), the ministry of social action (several non-programmed benefits), the ministry of agriculture (three non-programmed benefits) and the ministry in charge of grassroots development (four programs). *See Annex 8 for a map of the social protection system.*

❖ **Ministry of Grassroots Development, Youth and Youth Employment**

The mission of grassroots development is to ensure sustainable universal access to the common minimum subsistence level for all grassroots communities and organizations in Togo by 2032. The concept of "common minimum subsistence" is defined as a set of legitimate basic needs of the population, covering areas as crucial as they are varied, six of which appear to be essential in the lives of the Togolese: (i) food and nutrition; (ii) health; (iii) education; access to drinking water and hygiene; (iv) development of the population's capacity to generate wealth (energy, financial services, etc.); (v) improving connectivity of localities (rural roads, etc.)

❖ **Ministry of Social Action, Promotion of Women and Literacy**

The Ministry of Social Action and the Advancement of Women organizes State assistance to vulnerable or destitute people and coordinates, in conjunction with the ministries and agencies concerned, emergency relief in the event of natural disasters. It plans, programs and coordinates the government's actions with regard to the organization and supervision of the population with a view to their participation in social self-help. It designs, implements and monitors communication and social mobilization programs and projects.

❖ **Ministry of Health, Public Hygiene and Universal Access to Health Care**

It elaborates and ensures the implementation of the State's public health policy. To this end, it draws up programs to improve health coverage, as well as strategies for prevention and the fight against major endemic diseases. It ensures the permanence and continuity of the functioning of health services and guarantees easy and equitable access to health care. It ensures the social protection of public employees and workers, including those in the liberal professions, the informal sector and the agricultural sector. It organizes, in collaboration with the ministers and other institutions concerned, the management of pensions and retirement benefits as well as that of social security, health and social insurance mutuals.

❖ **Ministry of the Civil Service, Labour and Social Dialogue**

This ministry prepares and implements the State's policy in the fields of civil service, labor, employment and administrative reform. As part of its responsibilities relating to the civil service,

it ensures compliance with the legal and regulatory provisions governing the civil service and provides administrative management of State personnel.

❖ **Other Ministries**

Among other ministries involved in social protection in Togo, we can mention

- ✓ Ministry of Agriculture, Livestock and Rural Development,
- ✓ The Ministry of Economy and Finance.

3.3. Social performance

3.3.1. Social management system

The Togolese social security system has 3 branches:

Family benefits, pensions (invalidity, old age, death-survivors), work accidents-occupational diseases. The scheme covers employees, self-employed persons and also workers in the informal economy. Like employees, vocational school students, trainees and apprentices can be affiliated to the scheme if they receive remuneration subject to contributions. There is no protection against unemployment. A National Health Development Plan (PNDS) has been developed and renewed for the periods 2017-2022 and 2022-2025. It is broken down into the strengthening of 5 major strategic axes:

- Reduction of maternal, neonatal and infant mortality with strengthened family planning and adolescent health monitoring,
- Control of communicable diseases,
- Improved health safety,
- Non-communicable disease control and health promotion,
- Health system with the extension of the Universal Health Coverage (CSU).

The Labor Code, in its December 2020 version, requires all employers to take out an insurance contract covering the risks of illness and non-work-related accidents for the benefit of their workers. Unless there are more favorable provisions in collective agreements or employment contracts, the contributions due for health insurance will be jointly borne by the employer and the employee (not yet implemented). Since 2011, public employees and assimilated employees benefit from a compulsory health insurance scheme which is managed by the National Institute of Health Insurance (INAM). This health coverage should eventually be extended to the entire population. In addition to civil servants and primary and secondary school students in the public sector, children aged 0 to 18, women and the elderly have been covered by universal health insurance since 2021. The retirement pensions of civil servants are managed by the Caisse de Retraites du Togo (CRT), which is responsible for collecting social security contributions from government employers and providing benefits.

3.3.2. Social management capacity

Since 2006, Togo has undertaken legislative reforms aimed at: (i) extending the coverage of the general social security system to self-employed workers, workers in the informal sector

and ministers of religion; and (ii) ensuring social health coverage for public servants and assimilated workers through the creation of a compulsory health insurance scheme.

It concerns legal coverage as well as effective coverage according to the four guarantees of the social protection floor: (i) access to essential health care, including maternity care; (ii) basic income security for children (access to food, education, care, and any other necessary goods and services); (iii) basic income security for working-age people unable to earn an adequate income, including in the event of illness, unemployment, maternity, or disability; and (iv) basic income security for the elderly.

Legal coverage is characterized by the absence of guarantees for: (i) access to income in the event of unemployment and for the inactive, as well as for most children and the elderly; (ii) access to income and health care in the event of work-related accidents and illnesses for workers in the informal sector; and (iii) access to health care in the event of illness for workers in the private sector, the self-employed, workers in the informal sector, and the elderly who do not have a pension.

Effective coverage, that is, effective access to social benefits, falls short of the results expected from legal reforms.

There are several free and subsidized programs that contribute to access to health care and income, especially for poor and vulnerable groups. Most of these programs are scattered and limited in scope. Program benefits for poor families and children are generally low: the amount of cash transfers is 34.84 percent of the poverty line or 39.24 percent of the food poverty line for children. Social contributions are the main source of funding for contributory schemes. Individual "accident and occupational life" insurance (occupational risks) for government employees is financed entirely by the government employer. As for non-contributory programs, their financing remains highly dependent on donor support, thus mortgaging their viability.

The social protection system in Togo hardly plays a major role in the fight against poverty. It depends on several gaps that require various and multiple actions at all levels. These are, among others

❖ **Lack of knowledge of social protection**

The collective consciousness is not sufficiently sensitive to all aspects of social protection, particularly its importance and its practice in a context where traditional forms of solidarity have been sustainably eroded. The vast majority of the population does not yet have a clear understanding of social protection and its mechanisms. Many groups of people continue to believe in the welfare state regardless of their social position.

❖ **Gap in the social protection system**

The following table shows the gaps in the social protection system at all levels

Table 7 Gaps in the protection system in Togo

Institution/System	Gaps
Policy	<ul style="list-style-type: none"> ✓ Lack of a coherent policy framework and plan for the development of social protection in the country. ✓ Lack of a national social protection policy (pending validation).
Legal	<ul style="list-style-type: none"> ✓ Legal deficit for the extension of social coverage to all age categories, especially for the establishment of essential guarantees for the poor and vulnerable social strata; ✓ Inadequate implementation of existing social security and health insurance legislation
Institutional	<ul style="list-style-type: none"> ✓ Lack of an effective institutional framework for coordination and monitoring and evaluation; ✓ Lack of a national strategy and communication plan on social protection; particularly on the benefits of social security schemes; ✓ Insufficient national expertise to enable better planning and integration of social protection components into sector development programs in order to optimize internal resource mobilization; ✓ Lack of appropriate governance mechanisms for non-contributory programs that establish clear operational rules and procedures, including monitoring, evaluation and reporting mechanisms; ✓ Lack of an integrated social protection information system ; ✓ Lack of a strategy for targeting the indigent and poor.
Social security coverage	<ul style="list-style-type: none"> ✓ The social protection system is poorly oriented towards the poor and vulnerable segments of society. There is no social protection mechanism that is adapted to and meets the needs of low-income groups and the indigent. ✓ Over 90 percent of the population is not covered. ✓ The elderly, those living with disabilities and the vulnerable are not covered either de jure or de facto. - Low level of social benefits in general.
Financing	<ul style="list-style-type: none"> ✓ The resources dedicated to social protection by the government are insufficient. ✓ Lack of human resources

❖ Gaps in the institutional anchoring of social protection schemes and programs

The lack of interaction, particularly coordination between programs under the responsibility of different ministries and between those within the same department. The diagnosis reveals a very low level of coherence in interventions and the absence of mechanisms for sharing information, targeting beneficiaries and monitoring and evaluation. It should be noted that there are several structures in charge of managing services for the same groups of people. One of the possible consequences is the large proportion of resources dedicated to administrative and personnel costs.

★ Social Protection Branch

This department does not have any operational technical departments. Nor does it have any representation at the regional and local levels. Its capacity to cover the whole country is very limited with very insufficient human, material and financial resources.

3.4. Consistency between the Borrower's environmental and social system and the core principles of the PforR

An assessment of the compliance of the environmental systems applicable to the program's activities with the core environmental principles of the PforR Policy is provided in the following table.

Table 8 Consistency between the Borrower's environmental and social system and the core principles of the PforR

Core Principle #1: Program E&S management systems are designed to (a) promote E&S sustainability in program design; (b) avoid, minimize, or mitigate adverse impacts; and (c) promote informed decision making regarding the E&S effects of a program.			
Applicability: YES, applicable, as activities under the THE FLAGSHIP SAFETY NETS PROGRAM may result in negative environmental and human impacts.			
Strengths of the system:	Deficiencies:	Risks:	Recommendations
<ul style="list-style-type: none"> Existence of a legal and regulatory framework applicable to the management of E&S aspects; One of the agencies (ANADEB) that executes the Program has an operational environmental and social safeguard team. 	<ul style="list-style-type: none"> ANGE has very few resources and is not represented at the local level. Incomplete implementation of comprehensive management of environmental and social safeguards ANID and ATD do not have an environmental and social safeguard team. 	<ul style="list-style-type: none"> The management of the environmental and social impacts of the program are not managed (monitoring of the implementation of measures) in an optimal way. 	<ul style="list-style-type: none"> Decentralize ANGE's services throughout Togo. Strengthen the program's backup team (ANID and ATD)
Core Principle #2: The Program's E&S management systems are designed to avoid, minimize, or mitigate adverse impacts to natural habitats and physical cultural resources resulting from the Program. Program activities that involve the conversion or significant degradation of critical natural habitats or critical physical cultural heritage are not eligible for PforR funding.			
Applicability: YES applicable, activities (agricultural) related to the IGAs of the THE FLAGSHIP SAFETY NETS PROGRAM could be subject to exploitation of sacred sites.			
Strengths of the system:	Deficiencies:	Risks:	Recommendations
<ul style="list-style-type: none"> Existence of texts that regulate protected areas. The customs and habits protect the sacred sites at the local level. 	Failure to disseminate the texts governing protected areas at the local level.	Expansion of agricultural activities in protected areas.	Supervising agricultural activities related to IGAs
Core Principle #3: The program's E&S management systems are designed to protect public and worker safety from potential hazards associated with (a) the construction and/or operation of facilities or other operational practices under the program; (b) exposure to toxic chemicals, hazardous wastes, and other hazardous materials under the program; and (c) reconstruction or rehabilitation of infrastructure located in hazard-prone areas.			
Applicability: YES, applicable because the implementation of the program will require the intervention of trainers who will group the beneficiaries. Health and safety risks may be generated during the implementation of the IGAs.			
Strengths of the system:	Deficiencies:	Risks:	Recommendations
<ul style="list-style-type: none"> Existence of a labor code that takes into account environmental and social aspects. One of the agencies (ANADEB) that executes the Program has an operational environmental and social safeguard team. 	Non-application of the regulatory requirements of the labor code.	Exposure of workers and beneficiaries to health and safety risks (COVID19)	Monitor health safety measures in place during groupings and training sessions.
Core Principle #4: The program's E&S systems manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement and helps affected people improve, or at least restore, their livelihoods and standard of living.			

Applicability:NO. Not applicable to involuntary resettlement, including physical and economic displacement. Indeed, the various activities planned by the Program are not likely to result in land acquisition and loss of access to natural resources, nor to cause physical and/or economic displacement. Consequently, no activity requiring resettlement will be eligible and every effort will be made to avoid resettlement.

Strengths of the system:	Deficiencies:	Risks:	Recommendations
NA	NA	NA	No activity requiring relocation will be eligible and every effort will be made to avoid relocation.

Core Principle 5: The program's E&S systems give due consideration to cultural relevance and equitable access to program benefits, with particular attention to the rights and interests of indigenous peoples/local traditional communities in historically underserved sub-Saharan Africa, and the needs or concerns of vulnerable groups

Applicability: YES applicable, as the program will take into account the vulnerable (disabled and elderly)

Strengths of the system:	Deficiencies:	Risks:	Recommendations
The texts exist and take into account the protection of rights and interests of these people.	Identification of vulnerable persons;	Exclusion of vulnerable persons	Make the targeting exhaustive and inclusive with continuous updates.

Core Principle #6: The Program's E&S systems avoid exacerbating social conflicts, particularly in fragile states, post-conflict areas, or areas prone to territorial disputes.

Applicability: NOT applicable, northern Togo is experiencing terrorism, but not social or territorial conflicts. This THE FLAGSHIP SAFETY NETS PROGRAM should not exacerbate conflicts that do not exist at the population level.

Strengths of the system:	Deficiencies:	Risks:	Recommendations
NA	NA	NA	NA

**SECTION IV. ENVIRONMENTAL AND SOCIAL MANAGEMENT
RECOMMENDATIONS AND ACTION PLAN**

4.1. Recommendations

The assessment will make recommendations in the form of (i) generic measures for the generic E&S risks and impacts assessed above, (ii) an environmental and social eligibility process for PforR ASTRE Program activities, and (iii) specific measures to improve the performance conditions of the environmental and social management system in the implementation and monitoring of PforR activities and the Program Action Plan.

4.1.1 Generic environmental measures

The table below summarizes the matrix of mitigation measures applicable to the generic environmental risks and impacts described above.

Table 9 Mitigation Measures for Environmental Risks and Impacts

RA / DLI's associates	Description of Activities	Main enviromental risk/impact	Recommendations
Result Area 1 :	<ul style="list-style-type: none"> Regular cash transfers for chronic poverty. 	<ul style="list-style-type: none"> Destruction of the flora by charcoal production activities, cutting and sale of firewood. Decrease in carbon sequestration capacity 	<ul style="list-style-type: none"> Decentralize ANGE's services throughout Togo. Strengthen the program's backup team (ANID and ATD); Supervising agricultural activities related to IGAs
	<ul style="list-style-type: none"> Shock-responsive transfers for transient poverty and vulnerability to conflict and climate shocks. 		
	<ul style="list-style-type: none"> Creation of mobile savings Resilience measures such as video and text messaging on financial literacy and health benefits 		

RA / DLI's associates	Description of Activities	Main enviromental risk/impact	Recommendations
Result Area 2 : DLIs 5-6	<ul style="list-style-type: none"> • Adoption of an interoperability and coordination framework, and the development of a set of government data exchange platform to deliver social programs. • Deployment of the social register (RSPM); the construction of a Beneficiary Operations Management System (BOMS). • Implementation of a payment platform mapping unique identifiers. • Implementation of a payment platform mapping unique identifiers. • Build capacity for portfolio planning and multi-year public expenditure frameworks. • Adopt and use a governance mechanism for key ministries to coordinate the implementation of social policy. 		

4.1.2. Social measures

The following table presents the measures for improving the social system:

Institution/System	Gaps	Suggestions for improvement
Policy	<ul style="list-style-type: none"> ✓ Lack of a coherent policy framework and plan for the development of social protection in the country. ✓ Lack of a national social protection policy (pending validation). 	Develop a more integrated social protection policy; Finalize policies being drafted: Social protection policy, gender policy and child management policy.

Institution/System	Gaps	Suggestions for improvement
Legal	<ul style="list-style-type: none"> ✓ Legal deficit for the extension of social coverage to all age categories, especially for the establishment of essential guarantees for the poor and vulnerable social strata, in view of the recommendation; ✓ Inadequate implementation of existing social security and health insurance legislation 	Strengthening of legal texts
Institutional	<ul style="list-style-type: none"> ✓ Lack of an effective institutional framework for coordination and monitoring and evaluation; ✓ Lack of a national strategy and communication plan on social protection; particularly on the benefits of social security schemes; ✓ Insufficient national expertise to enable better planning and integration of social protection components into sector development programs in order to optimize internal resource mobilization; ✓ Lack of appropriate governance mechanisms for non-contributory programs that establish clear operational rules and procedures, including monitoring, evaluation and reporting mechanisms; ✓ Lack of an integrated social protection information system ; ✓ Lack of a strategy for targeting the indigent and poor. 	Strengthening of the social action coordination platform
Social security coverage	<ul style="list-style-type: none"> ✓ Over 90 percent of the population is not covered. ✓ The elderly, those living with disabilities and the vulnerable are not covered either de jure or de facto. - Low level of social benefits in general. 	Define vulnerability criteria Finalize the household registry; Better define the role of social ;
Financing	<ul style="list-style-type: none"> ✓ The resources dedicated to social protection by the government are insufficient. ✓ Lack of human resources (specific profile) 	Increase resources for social protection

The following table presents the general mitigation measures for potential social impacts and risks related to THE FLAGSHIP SAFETY NETS PROGRAM activities.

Table 10 Generic social impact mitigation measures

Description of activities	Main social risk/impact negative	Recommendation
Regular cash transfers for chronically poor	Risk of exclusion of households (feeling of exclusion);	Make the targeting comprehensive with continuous updates.
	<ul style="list-style-type: none"> • Risk of household debt • Network coverage not total • Risk of road accidents; • Loss of cash received; • Delays on transfer information • Non-receipt of transfer • Non availability of cash in the receiving agency • Increased intrahousehold / marital conflicts related to cash management in the household • Gender-based violence • Transmission covid19 SEASEA/SH risk 	<ul style="list-style-type: none"> • Avoid late payments • Strengthening network coverage in vulnerable and remote areas • Awareness program for beneficiaries (on the use of the platform, household management and IGAs) • Establish a framework for listening and reporting risk related to EAS/HS • Develop and implement a complaint management mechanism at the PforR level for beneficiaries
Shock-responsive transfers for transient poverty and vulnerability to conflict and climate shocks.	Risk of dependency;	Educate beneficiaries on the use of cash
Productive inclusion and resilience measures. (Training in micro-entrepreneurship)	<p>Land conflict on cultivable land (agricultural activities);</p> <p>Health and safety (Transmission of covid19; risk of commuting accidents) ATS/HS risk; VBG</p>	<ul style="list-style-type: none"> - Sensitize beneficiaries on the use of land for IGAs - Sensitize workers and all program staff on gender issues and the protection of vulnerable persons, - Set up a listening and risk signalling framework related to EAS/HS; - Have all program staff sign codes of conduct that commit them to avoiding inappropriate behavior (GBV; HS/EAS, etc.), - Educate program staff and beneficiaries on the barriers to Covid-19. - Observe barrier measures during training and awareness sessions. - Develop and implement a program-level complaint management mechanism for recipients and workers;
	Health and safety risks for consultants, field validators, supervisors, trainers and others who are considered "project workers"	<ul style="list-style-type: none"> - Establish an occupational health and safety committee within the agencies involved in the implementation of PforR activities. - Provide consultants, validators or supervisors with good quality vehicles during field trips - Solicit the services of experienced drivers for field trips

Description of activities	Main social risk/impact negative	Recommendation
Adoption of an interoperability and coordination framework, and the development of a set of government data exchange platform to deliver social programs	Risk exposure of personal data;	- Fight against cyber crime
	Data loss; Risk of household exclusion; SEA/SH risk; GBV	- Fight against cybercrime - Make the targeting exhaustive with continuous updates
Deployment of the social register (RSPM)	Data loss; Risk of exclusion of households;	<ul style="list-style-type: none"> - Sensitize workers and all program staff on gender issues and the protection of vulnerable persons - Set up a listening and risk signalling framework related to SEA/SH - Have all program staff sign codes of conduct that commit them to avoiding inappropriate behavior (GBV; SEA/SH, etc.) - Educate program staff and beneficiaries on the barriers to Covid-19 - Observe safe distancing measures during training and awareness sessions - Develop and implement a program-level complaint management mechanism for recipients and workers;
the construction of a Beneficiary Operations Management System (BOMS).		
the implementation of a payment platform mapping unique identifiers.		
Build capacity for portfolio planning and multi-year public expenditure frameworks.	Risk of resource reallocation; SEA/SH;	
Adopt and use a governance mechanism for key ministries to coordinate the implementation of social policy.	Risk of rejection or resistance to innovative measures;	- Communicate sufficiently about the program

4.1.3. Environmental and social eligibility process for PforR activities

All THE FLAGSHIP SAFETY NETS PROGRAM activities and those related to IGAs to be identified in the implementation of the Program will be screened by E&S safeguards team under the supervision of ANGE. This E&S screening process will be carried out in accordance with the regulatory environmental and social assessment procedures in force in Togo (use of the list of projects subject to a simplified and in-depth EIA) and in accordance with the principles of the Bank's PforR financing tool.

After screening and based on the results obtained, the environmental and social eligibility of the IGAs identified in the Program will be determined.

Prescriptions/formulation of generic mitigation and monitoring measures for IGA components will be proposed to facilitate implementation of activities.

4.1.4. Specific measures in the program's action plan to improve the performance of the E&S management system.

The following table mentions specific measures to improve the performance of Togo's environmental and social management system.

No.	Measure	Activity	Responsible	Calendar
1. STRENGTHENING OF THE ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM				
1.1	Strengthen the program's backup team (ANID and ATD);	1. Establish a safeguard team (one environmental safeguard specialist and one social development specialist) in each of the two entities (ANID and ATD).	The Program Management Unit	Upon implementation of the Program.
1.2	Supervise the use of land for agricultural IGAs and good practices for environmentally friendly livestock farming	1. Sensitize beneficiaries on the use of land for agricultural IGAs 2. Develop and implement an ESMP/RMP for livestock activities	The Program Management Unit	3 months after the Program comes into effect.
1.3	Establish a framework for identifying and reporting risk related to EAS/HS;	1) Formalize the listening platform 2) Identify listening actors and a communication channel	The Program Management Unit	2 months after the Program comes into effect.
1.4	Strengthen and disseminate the existing complaint management mechanism	a) Identify the specifics of the Program in terms of complaints; b) Adjusting the existing PGM; c) Diffuses the adjusted PGM	The Program Management Unit	6 months after the Program comes into effect.
2. INSTITUTIONAL CAPACITY BUILDING OF KEY ACTORS AND PROGRAM STAKEHOLDER REPRESENTATIVES				
2.1	Provision and maintenance throughout the implementation of the E&S/human resources skills program	Above all, the provision and, if possible, the appointment of qualified human resources to ensure that E&S aspects are considered during the implementation of the program for all institutions concerned.	The Program Management Unit	3 months after the program comes into effect
2.2	Put in place systems to secure personal data	-Acquisition of data protection software and recruitment of specialists.	The Program Management Unit	Continuous
2.3.	Make the targeting exhaustive and inclusive with continuous updates			

4.2. Conclusion on the level of environmental and social risk in the governance of the PforR

1. Although the environmental and social effects of the activities under this Program are classified as very low to moderate, the Program offers an opportunity to both strengthen the skills in E&S safeguards of the actors involved in the implementation of the Program such as ANID and ATD. The program will also strengthen existing safeguards tools such as the MGP to adapt them to the new context. All of these measures are documented in the ESES Action Plan that guides the overall formulation of the Program. The implementation of some of these measures will be strengthened by incorporating them into the overall Program Action Plan, with the agreement of the GoT, and/or legally incorporating them into the Program Financing Agreement.

SECTION V. APPENDICES

5.1. Attendance list of consultations carried out

ANNEX 1: Attendance list for the preparation workshop of the new PforR THE FLAGSHIP SAFETY NETS PROGRAM operation from February 21 to 24, 2023

N°	Institutions	Name and surname	Function
1	National Identification Agency	DEVO Silete	Director General ANID
2		MAGNON Kouassi A.	Monitoring and Evaluation Manager WURI
3		ATTIKPATI Affo-Ogou	Social Development Specialist WURI
4		AKOU-EDI Joëlle Leleda	ANID Statistician
5		KOMOU Pyabalo Victor	ANID Statistician
6	Ministry of Planning, Development and Cooperation	PANETO Bèguèdouwè	Secretary General
7		AWESSO Tchilalou Wife KONDO	Director of Multilateral Cooperation
8		DAO Alaza Wiyao	Head of Division
9		ANAMINA Akoniga Dissougma	Director of Planning and Development Policy
10		LANTAME Sambire	Economist and planner
11		SALAMI Nafiou	Planner

12		ALE Sawaba	Environmentalism
13		KOUWODO Kokou Michel	Planner
		Ouro-Djala Halarou	In charge of studies
14	Ministry of Economy and Finance	MUSTAPHA Faousatou	Accountant Manager MEF/DGBF
15		DOUGBLO Atsu Yawo	Debt Management
16	Ministry of Grassroots Development, Youth and Youth Employment	KATANGA Mazalo	Director General ANADEB
17		TOFIO Kokou Koumah	FSB Coordinator
18		BOANE Séidou Ablatif	Monitoring and evaluation manager ANVT
19	Ministry of Social Action, Promotion of Women and Literacy	AGBONON Kodjo Sivah	Director General of Social Action
20	Ministry of Public Service and Labour and Social Dialogue	TSIGLO Kossi	DG ANPE
21		KILIOU Komla	Director of Occupational Health and Safety
22	Ministry of Higher Education and Research	ALADJERE Atouté Wassolime	Civilian Administrator
23	Ministry of Digital Economy and Transformation	EKOUHOHO Kafui	DG of the Togo Digital Agency
24		AGBAGLA Togbé	CTO/ATD
25		TAKPAH Koffi Hyacinthe	Project manager at Togo digital

26	Ministry of Agriculture, Livestock and Rural Development	Walla Eso-Simna	Engineer at DPPSE
29	Ministry of Health, Public Hygiene and Universal Access to Health Care	PAGNAN Eso	Social Protection Directorate
30	Ministry of Financial Inclusion and Organization of the Informal Sector	ABIDJI A. Sika wife ADAMOU	PAIFFV Coordinator and Program Officer
31	General Secretariat of the Government	KPANGO Alimou	Project Analyst



Photo 1 Photo 1: Hybrid training workshop for national social protection actors by World Bank experts.

Attendance list for the consultation of agents of the Social Protection Branch HPB



PforR TOGO ASTRE (P178835)

EVALUATION DES SYSTEMES ENVIRONNEMENTAUX ET SOCIAUX (ESES) DU TOGO

Activité : consultation des parties prenantes

Lieu : Direction Générale de la Protection Sociale Date : 01/03/2023

Liste de présence à la rencontre

N°	Nom & Prénom	Sexe	Fonction	Département /ministère	Email	Téléphone
01	PAGNAN Esso	M	Inspecteur du travail chargé d'études	MSHPAUS/DEPS	pm_esso3@yahoo.fr	90272127
02	GBATCHI Elom	M	Inspecteur du Travail Spécialiste Prot. Soc.	MSHPAUS/DEPS	elom76@yahoo.fr	90119325
03	KILILOU Komba	M	CNP	BIT	essoriland@yahoo.fr	90001959
04	ATTIOGUE Koffi	M	Banque ^{SSE} SSE ^{SSF} SSF	BM		93190554
05	NICK AZAH	M	Consultant	BM	carol@worldbank.org	+265 908 80 02 04

Attendance list for the consultation of agents of the Social Action Branch DGAS

PforR TOGO ASTRE (P178835)

EVALUATION DES SYSTEMES ENVIRONNEMENTAUX ET SOCIAUX (ESES) DU TOGO

Activité : consultation des parties prenantes

Lieu : Direction Générale Action Sociale Date : 01/03/2023

Liste de présence à la rencontre

N°	Nom & Prénom	Sexe	Fonction	Département /ministère	Email	Téléphone
01	GANI Koffi	M	DC	MAS PFA	ganikoffi@maspfa.gov.tg	90125727
02	AGNON Kodjo Sireh	M	DG Action sociale	MAS PFA	agnon@maspfa.gov.tg	90197252
03	BENANZA Bénédicte	F	DG Prévention et promotion	MAS PFA	benanza@maspfa.gov.tg	90242937
04	ATTIOGBE Koffi	M	Consultant SSE	Banque mondiale	kattio@worldbank.org	93190584
05	NICK AZAH	M	STC	Banque mondiale	nick@worldbank.org	+225 07800204
06	BILEBA N'Gorobé	M	SG	MAS PFA	stanislaspileba@gmail.com	90254104

Attendance list for the consultation of agents of the National Identification Agency ANID

PforR TOGO ASTRE (P178835)

EVALUATION DES SYSTEMES ENVIRONNEMENTAUX ET SOCIAUX (ESES) DU TOGO

Activité : consultation des parties prenantes

Lieu : Agence Nationale d'identification ANID Date : 02/03/2023

Liste de présence à la rencontre

N°	Nom & Prénom	Sexe	Fonction	Département /ministère	Email	Téléphone
1	ATTIKPATI Affo-Ogou	M	Spécialiste en Développement Social	MENTD	affo.attikpati@wuri.tg	90029409
2	KATCHEA Monijiel	M	Auditeur interne	MENTD / ANID	monijiel.katchea@wuri.tg	91461075
3	DJAKA Yaovi Maanui	M	Assistant en Gestion des plaintes	MENTD	etienne.djaka@wuri.tg	90112001
04	ATTIOGBE Koffi	M	Environnementaliste	Banque mondiale	kattio@worldbank.org	93190584
05	NICK AZAH	M	LI	V		+225 07800204

Attendance list for the consultation of agents of the National Environmental Management Agency ANGE



PforR TOGO ASTRE (P178835)

EVALUATION DES SYSTEMES ENVIRONNEMENTAUX ET SOCIAUX (ESES) DU TOGO

Activité : consultation des parties prenantes

Lieu : ANGE Date : 02/03/2023

Liste de présence à la rencontre

N°	Nom & Prénom	Sexe	Fonction	Département /ministère	Email	Téléphone
01	ADADJI Roffi Ejanom	M	DG	ANGE	eadadji@yahoo.fr	
02	SEMESSO Kinkou A.	M	chef service ESES/BOSS	ANGE	martinno0021@gmail.com	
03	TOULASSI DJIAN Emekeu	F	Environnementaliste	ANGE	toulassiemef@gmail.com	
04	ATTIOGBE Roffi VI	M	Environnementaliste	Banque Mondiale	kattio@worldbank.org	

Attendance list for the consultation of agents of the national agency for grassroots development support ANADEB



PforR TOGO ASTRE (P178835)

EVALUATION DES SYSTEMES ENVIRONNEMENTAUX ET SOCIAUX (ESES) DU TOGO

Activité : consultation des parties prenantes

Lieu : ANADEB Date : 02/03/2023

Liste de présence à la rencontre

N°	Nom & Prénom	Sexe	Fonction	Département /ministère	Email	Téléphone
1	KATANGA Nazalwa	F	DG	ANADEB/MDJES	anadebtoz@gmail.com	90134267
2	TOFIO K. Koumou	M	Coordonnateur FSB	Ministère du Développement à la Base	tofio.koumou@gmail.com	90013436
3	TSOLENYANU Roffi A.	F	DAF ANADEB	ANADEB/MDJES	dziabodip@anadeb.org	90010579
4	BANKATI Wankati	M	Expert MIE	ANADEB/MDJES	wbankati@gmail.com	90013436
5	IROKO Yab Enikitan	M	Spécialiste Soutien Environnemental	Ministère Développement à la Base	yroko77@gmail.com	90017494
6	KEGBAO Fankou	M	Spécialiste Social à la Base	Ministère Développement à la Base	kegbao@gmail.com	90017494
07	ATTIOGBE Roffi VI	M	Environnementaliste	Banque Mondiale	kattio@worldbank.org	93198556

Attendance list for the consultation of the agency Togo digital



PforR TOGO ASTRE (P178835)

EVALUATION DES SYSTEMES ENVIRONNEMENTAUX ET SOCIAUX (ESES) DU TOGO

Activité : consultation des parties prenantes

Lieu : ATD Date : 02/03/2023

Liste de présence à la rencontre

N°	Nom & Prénom	Sexe	Fonction	Département /ministère	Email	Téléphone
01	Ben Sile	M	DC	AN/D	silote.dco@min.dg.tg	91 96 2840
02	EKOUHO KAFUI	F	DC	ATD	kafui.ekouho@digital.tg	92 21 8696
03	ATTIOGBE KOFI	M	Environnementale	Bureau Mondiale	Kattiofhe@worldbank.org	93 13 0556

Attendance list for the consultation of a sample of FSB project beneficiaries



PforR TOGO ASTRE (P178835)

EVALUATION DES SYSTEMES ENVIRONNEMENTAUX ET SOCIAUX (ESES) DU TOGO

Activité : consultation des parties prenantes

Lieu : KPETSOU 1^{ère} Préfecture BPAS-UNO Date : 08/03/2023

Liste de présence à la rencontre

N°	Nom & Prénom	Sexe	Fonction	Département /ministère	Email	Téléphone
01	DOBE A. Sogou	M	Président CVD	KPETSOU		98 44 3106
02	AMEHE Kadiav	M	Pré. des Jeunes APOC	"		98 66 3041
03	AMANKÉ Acanléssome	M	Vice Président CVD	"		98 16 7841
04	AMOUSSI Nonoureddi	F	Femme leader	"		97 75 5923
05	IXIO AJOFE SITO	F	Bénéficiaire T.M	"		—
06	HOUPAKÉ Abba	F	"	"		—
07	DADOHOV N. Adoussi	F	"	"		98 00 1853
08	SETODJO AKOESSOMA	F	"	"		95 18 0686

N°	Nom & Prénom	Sexe	Fonction	Département /ministère	Email	Téléphone
09	EBDE Amelégan	F	Bénéficiaire TM	Kpotsou		—
10	ABIDUDDJA Agelégan	D	"	KPETSOU		9605858
11	ATATD Xassan	F	"	"		—
12	AFANGBEDEJI Kassi	M	VÉTÉRINAIRE	KPETSOU		99230348
13	ATSU Ablavi	M	Bénéficiaire TM	"		97364324
14	GAGNOR Amamou	M	Producteur	KPETSOU		98852998
15	ABIDI Komi	M	Secrétaire chef	KPETSOU		90943625
16	VIOTDJI Mahou	M	cultivateur	"		—
17	ANAMOU Yawa	F	Bénéficiaire TM	"		—
18	DANSOU Kousini	D	"	"		—
19	DANSOU Dangren	F	"	"		9800986
20	FOULY Agbeko	M	cultivateur	"		98864674
21	AMETEPE Issa	M	Mannisier	"		—
22	APEDJINDY Marie	F	Receveuse	"		97962035
23	ATSOU Mekan	M	ASC classe Kpotsou	Santé / Kpotsou		96-55 8828
24	AYIKUJINABE	F	Accordeuse	Santé / Kpotsou		97626124

N°	Nom & Prénom	Sexe	Fonction	Département /ministère	Email	Téléphone
25	SOMARE Amelin	F	AREI Kpetsou	Région Kpetsou		91152986
26	KOUZAN/1 Séverin	M	Etat civil Kpetsou	Commune BAS MONON		995421446
27	TOGBUI ABIDI Kaleneu	M	Chef canton	KPETSOU		90-04-27533
28	ALLAH Jawote	M	Agent d'appui au développement à la base	ANADER	ayawote@yahoo.fr	90914088
29	DENYIEBA Y. King	M	A. Régional FCB	ANADER	delphindegnigba@gmail.com	90842501
30	ADAM Faliatoul	F	ARFS	ANADER	faliatoul@gmail.com	90291870
31	ADJO GAN Krouni Sessini	F	FCB	ANADER	krouniadjog@gmail.com	91996142
32	BEYON Gariette	F	SPM	ANADER	beyongariette@gmail.com	99969179
33	ESSOH Wenbedigine	F	Coordonnatrice	ANADER	wenbedigine@yahoo.fr	90719644

N°	Nom & Prénom	Sexe	Fonction	Département /ministère	Email	Téléphone
34	KOUANIGAN ABOA	F	Bénéficiaire TM	KPETSOU		98503021
35	SOGLODE Abla	F	Bénéficiaire TM	KPETSOU		99759739
36	AGBEDJINDU Aka	F	"	"		-
37	Mme ABOU	F	Prémière leader	"		90386052
38	AGUESSOU Amélie	F	Bénéficiaire TM	"		96407426
39	AGLANME Aka	F	"	"		-
40	ZOSSOU Djalorchi	F	"	"		96397255
41	DEGIBE Amélie	F	"	"		99779120
42	ANOUYOU Makouman	F	"	"		-
43	ADONTOU Dalaouman	F	"	"		-
44	YOMENOU Mama	F	"	"		7993654
45	DEGIBE Amélie	F	"	"		-
46	AFADOUA NOAOUSSI	F	"	"		90016838
47	AFADOUA Aagnonde	F	"	"		-



Photo 2 Partial view of the FSB cash transfer beneficiaries' consultation

Attendance list for the consultation of a sample of NOVISSI beneficiaries



PforR TOGO ASTRE (P178835)

EVALUATION DES SYSTEMES ENVIRONNEMENTAUX ET SOCIAUX (ESES) DU TOGO

Activité : consultation des parties prenantes

Lieu : ATD / Benin / Wane Novissi Date : 10/03/2023

Liste de présence à la rencontre

N°	Nom & Prénom	Sexe	Fonction	Département /ministère	Email	Téléphone
1	COMALAH Jernah	F	Revendeuse	NZIEKONAKPOE		92-12-70-07
2	MALIN AFIWA	F	Revendeuse	NZIEKONAKPOE		90-06-6889
3	ZOBIVU Kossima	F	Revendeuse	NZIEKONAKPOE		90-55-9893
4	GASSIN ENYON	F	Revendeuse	NZIEKONAKPOE		92-47-90-97
5	SODEGBE M	M	MECANO AUTO	Minamaweleu		92-89-7713
6	BRUKUTIDAI	F	Revendeuse	Agbalépéolo		92-71-2902
7	AGIBALA Magnin	F	Revendeuse	Agoué-Logopé		91-33-7492
8	KOUBONOU A.	M	Couturier	Agoué-Logopé		90000790

N°	Nom & Prénom	Sexe	Fonction	Département /ministère	Email	Téléphone
9	BASSAN L.	M	Commerçant	Agoué-Logopé		90316939
10	SMA-TCHINDO T.	M	Chauffeur	Agoué-Logopé		92074555
11	ADZOGBE K. Daniel	M	Gerant	Agoué-Logopé		90-62-8589
12	ATAKA Yawu H.	M	WURI/ANID	MENTI		90112001
13	ATTIKPATI Afo-ogou	M	ANID/WURI	MENTI		90089409
14	ATTIOGBE KOFFIV	M	Environnementaliste	Banque Mondiale	Kattigbe@worldbank.org	93790554
15	DEVO Sibte	M	DG ANID	ANID	Sibte-deo@amid-pd.tj	91962840
16	EKUDHON Kofui	F	DG ATD	ATD	Kofui-ekudho@digital-gouv.tg	92 21 86 96



Photo 3 Partial view of the consultation with a sample of NOVISSI cash transfer recipients

Attendance list for the consultation FETAPH



PforR TOGO ASTRE (P178835)

EVALUATION DES SYSTEMES ENVIRONNEMENTAUX ET SOCIAUX (ESSES) DU TOGO

Activité : consultation des parties prenantes

Lieu : Séjour FETAPH Date : 13/04/2023

Liste de présence à la rencontre

N°	Nom & Prénom	Sexe	Fonction	Département /ministère	Email	Téléphone
01	ALLOKPENOU Lamaton	F	Coordonnatrice Unité Genre & Protection Enfant	FETAPH	lamaton2000@yahoo.fr	90353151
02	N'KEKPO Dodji	M	Directeur de Programme	FETAPH	fetaph2002@yahoo.fr	90237647
03	AKAKPO - NUMADO Eyomen A.	M.	PCA / FETAPH	FETAPH	andugratien@yahoo.fr	70287808
04	ANALENE GBAREBA	M	Coordo Inclusion FETAPH	FETAPH	anamarcus@yahoo.fr	90225219
05	ATTVOGRE KFFU	M	Environnementaliste	Banque mondiale	Kattvoled@worldbank.org	93190584



Photo 4: view of the consultation with FETAPH head office

5.2. Outcome of the stakeholder consultation.

Stakeholders were consulted as part of the development of the environmental and social systems assessment report in which the social protection program will be implemented in Togo. The stakeholder consultation began with a training workshop on the World Bank's new financing tool, the PforR. The workshop, held over four days (February 21-24, 2023), brought together participants from the National Identification Agency, the Ministry of Development Planning and Cooperation, the Ministry of Economy and Finance, the Ministry of Grassroots Development, Youth and Youth Employment, the Ministry of Social Action, Promotion of Women and Literacy, the Ministry of the Civil Service and the Ministry of Health, the Ministry of Public Service and Labor and Social Dialogue, the Ministry of Higher Education and Research, the Ministry of Digital Economy and Digital Transformation, the Ministry of Agriculture, Livestock and Rural Development, the Ministry of Health, Public Hygiene and Universal Access to Health Care, the Ministry of Financial Inclusion and Organization of the Informal Sector and the General Secretariat of the Government.

A section was dedicated to the assessments required for the preparation of the program. Among other assessments, the environmental and social systems assessment was explained to the participants.

Following this training workshop, the actual consultations for the collection of information and the development of the assessment report of the environmental and social systems of Togo were conducted from February 27 to March 10, 2023.

The objective of these series of consultations is first to explain the program to the participants and collect their opinions and then to take stock of the environmental and social protection system in Togo. The meetings made it possible to gather the opinions of representatives of institutions and organizations, to discuss their strengths and weaknesses with regard to the consideration of environmental and social aspects and their active involvement and participation in the implementation of the program, to discuss the risks and potential environmental and social impacts of the activities to ensure that the national environmental and social system in place is adequate to manage the program.

The interviews were based on the presentation of the project and its objectives. Then the discussions are conducted around the current state of the environmental and social protection system in Togo.

The methodology adopted for the stakeholder consultation was based on the following points: working meetings, face-to-face interviews, administration of online questionnaires, and telephone calls.

The various entities involved in environmental and social protection in Togo were consulted. They are the Directorate of Environment and the National Agency for Environmental Management (ANGE).

Consultation meetings were also held with the technical departments of the ministries involved in the identification and preparation of the project. These are the national identification agency ANID, the Togo digital agency ATD and the national agency for grassroots development support.

5.2.1. Results of the Ministry of Environment and Forestry Resources consultation

The General Secretariat of the Ministry of Environment and Forest Resources, the Directorate of Environment and the Office of Development and Exploitation of Forests (ODEF), has allowed to gather the strengths and weaknesses of the legal and institutional framework and the capacity of ANGE in environmental management.

→ Analysis of the legal framework for environmental management: National legal framework for environmental management

This aspect will be very little solicited due to the nature of the program; however the following table shows the strengths and weaknesses with regard to the legal framework for environmental management.

HIGHLIGHTS	WEAKNESSES	RECOMMENDATIONS
Law No. 2008-005 of May 30, 2008 on the framework law on the environment		
<ul style="list-style-type: none"> - Protection of fauna and flora (articles 61 to 66) 	<ul style="list-style-type: none"> - Lack of provisions for strategic environmental assessments - Lack of implementing legislation on flora management, eco-labelling, environmental policing and incentives and disincentives 	<ul style="list-style-type: none"> ▪ Provisions related to the impacts of mercury on human health and the environment ▪ Decentralized environmental management

→ **ANGE's environmental management capacity**

Environmental Assessments :

- Lack of transparent working mechanisms
- Lack of multidisciplinary technicians
- Lack of appropriate personnel from the Ministry of Environment and Forestry Resources
- Lack of qualified personnel

Controls and monitoring :

- Badly done
- ANGE cannot be judge and party at the same time, it must leave the follow-up to the direction of the environment and other structures of MERF
- ANGE is practically sloppy in its monitoring and control

Monitoring the implementation of the projects' ESMPs:

- Male made
- ANGE cannot be judge and party at the same time, it must leave the follow-up to the direction of the environment and other structures of MERF
- ANGE is practically botching the monitoring of project implementation

Capacity in terms of human resource availability:

- Insufficient qualified personnel under the Ministry of Environment and Forestry Resources, which is the supervisory ministry
- Lack of specialists in certain fields

Capacity in terms of availability of financial resources:

- Insufficient financial resources

Decentralization of ANGE services: ANGE focal points exist in the different prefectures; they just need to be reinforced.

5.2.2. Result of the ANGE consultation

1. Legal framework for hazardous waste management

❖ National Texts

- The Togolese Constitution of the Fourth Republic of October 14, 1992, guarantees citizens the right to a healthy environment. Article 41 states: "Everyone has the right to a healthy environment. The State ensures the protection of the environment. Article 84, paragraph 17: "The law establishes the rules concerning the protection and promotion of the environment and the conservation of natural resources".
- Law n° 2009-007 on the Public Health Code of the Togolese Republic in its fundamental principles provides in its article 23 that the dumping and burying of industrial toxic waste, biomedical or hospital waste are prohibited. Article 24 stipulates that toxic waste of industrial origin, biomedical or hospital waste and other special waste must be disposed of in accordance with the provisions of national and international texts applicable in Togo.

- Law N°2008-005 of May 30, 2008, bearing the framework law on the environment, conditions the modalities of waste treatment in its sections 8, 9, 10 and 11.
- Law No. 2007-011 of March 13, 2007 on decentralization and local liberties indicates the responsibility and central role of communes in the implementation of the national hygiene-sanitation policy. It stipulates in particular that local authorities have the following responsibilities: (i) wastewater collection and treatment; (ii) environmental protection regulations.
- Law No. 2010 - 004 of June 14, 2010 on the Water Code sets the general legal framework and the basic principles of integrated water resources management (IWRM) in Togo. It determines the fundamental principles and rules applicable to the allocation, use, discharge, flow and release of polluting substances into surface or groundwater, directly or indirectly, to the protection and management of water resources.
- Law N°2011-006 of February 21, 2011 on the social security code in Togo. It defines the provisions governing the general compulsory social security scheme. It provides in its Article 3 that all workers subject to the provisions of the Labor Code, without any distinction of race, sex, origin or religion, are obligatorily subject to the general social security scheme.

The interministerial decree N° 010/MER/MS/MERF sets the norms or standards for wastewater discharge into the natural environment.

2. Strengths and weaknesses of the legal framework for waste management in Togo

❖ Forces

- The environment and waste management sector is one of the government's priorities. This is marked by the establishment of a national and international legal framework as well as the establishment of an institutional framework (MERF, ANGE, ANASAP...)
- The government, with the help of partners such as the AFD, supports communities in the area of waste management through programs such as the "Lomé Urban Environment Program",
- The government is putting in place policies to encourage the installation of companies in the field of waste management (AGR, GRAVITA...)
- The government promotes the training and integration of informal actors in the waste management sector through NGOs and associations
- Recycling and recovery of certain fractions of WAS (paper, bottles, plastics)
- Presence of documentation on the waste management sector in Togo

❖ Weaknesses

- Some ratified conventions are difficult to apply due to the lack of implementing legislation, notably waste treatment standards, discharge standards, air, soil and water quality standards.
- The anarchic implantation of informal structures
- Lack of competent human resources
- Low literacy level

5.2.3. Results of the consultation of the Ministry of Digital Economy and Transformation

The Ministry of Digital Economy and Transformation does not have a structure dedicated to taking social and environmental aspects into account. However, decisions on environmental and social aspects are made in an ad hoc manner.

5.2.4. Results of the consultation with the Ministry of the Civil Service, Labour and Social Dialogue

Institutions	Strenghts	Weaknesses	Recommendations or proposed solution
Ministry of the Civil Service, Labour and Social Dialogue	Like the agents of all ministries, those of the Ministry of the Civil Service, Labor and Social Dialogue benefit from health coverage, sickness, old age, maternity, family allowance...including contractual employees	Remaining challenges may be related to the quality of certain health care benefits and the definition of the minimum social protection floor	Improve the quality of health care for public servants and define a minimum social protection floor
Occupational health inspection Labour inspection Occupational Health and Safety Branch	Services in charge of health and safety at work implemented -Services with human resources	Lack of environmental and social safeguarding skills -Insufficient logistical resources for field activities -Lack of metrology equipment	Train staff in environmental and social safeguards -Equip services with field vehicles -Equip departments with metrology equipment
Directorate of Studies and Planning	Has personnel trained in the development and management of projects and programs, particularly those to be considered in the Public Investment Project (PIP). These projects, whose development takes into account the analysis and evaluation of environmental and social risks	Insufficient skills in environmental and social risk analysis and assessment; Lack of an environmental and social risk analysis tool.	Build staff capacity to analyze and assess environmental and social risks of projects and programs
Social Protection Branch	Availability of qualified human resources	-Insufficient human resources -Lack of material and financial resources -organizational chart not operationalized -Lack of deconcentrated services in the interior of the country	-Strengthen HPB with human, financial and material resources; -Organize the service by operationalizing the organizational chart -Create regional social protection services
The Togo Pensioners' Fund (CRT)	Regular and timely payment of pensions	Management of a single branch (old age branch)	Extend management to branches: - family benefits; - of professional risks

Institutions	Strenghts	Weaknesses	Recommendations or proposed solution
	Reducing the processing time of pension files	Imbalance of the system over the last twenty years (since 1997)	- Update the actuarial study of the plan conducted in 2010; - Reforming the system
	More or less integrated information system	Accounts for fiscal years 2016 through 2021 not certified or adopted	-----
	Deconcentration of services within the country (regional agencies)	Distribution of the CRT's services over several sites at its headquarters in Lomé	Provide the CRT with a building to house all its services
	Control of charges and costs	Problem of competence of some agents	Build capacity and continue to improve recruitment

5.2.5. Results of the consultation with the Directorate General of Social Protection

1. Mission and organization in the implementation of social protection

In accordance with Article 57 of Order N°006-2013/MTESS of July 05, 2013 on the organization of the Ministry of Labor, Employment and Social Security, the General Directorate of Social Protection (DGPS) is responsible for:

- to develop and implement the national policy of social protection for workers in all sectors;
- manage issues related to health insurance, work accident/occupational disease insurance, pension insurance (retirement, disability, death), unemployment insurance, family insurance and mutual insurance;
- Study and prepare the approval files of public and private organizations in the field of social coverage;
- Coordinate and monitor the activities of social security or health mutuals and private social insurance;
- preparing and monitoring reciprocal social security agreements or conventions;
- To prepare legislation and regulations on hygiene and health protection for workers in all sectors;
- develop a national strategy for the prevention of occupational risks;
- Coordinate occupational health and safety training activities;
- inform and educate the public and prepare documentation on safety, hygiene and health at work;
- Study and prepare the files of approval of the services of safety and health at work as well as those public, parapublic and private organizations concerned by the questions of hygiene and safety at work;
- to coordinate the activities of the public, semi-public and private services and organizations concerned with health and safety at work;
- coordinate the information system on the safety and health of workers.

HPB is comprised of two directorates:

- The Social Welfare Directorate (Protection Strategies and Policies Section and Legislation and Control Section);
- Occupational Health and Safety Branch (Standards and Policy Section and Studies and Certifications Section)

2. Social protection policy

There is a technically validated social protection policy document in 2019. Its adoption in the Council of Ministers is expected.

3. Integration of environmental and social aspects into activities (Occupational health and safety policy)

Through its Occupational Health and Safety Department (DSST), the DGPS participates in environmental and social impact studies, workplace risk assessments, including environmental and social risks, and medical examinations of company employees. The DSST participates in the establishment of occupational safety and health committees in companies and coordinates the training of the members of these committees.

HPB has a method of managing garbage: collection of garbage from offices to the outside garbage can. Collection of garbage from the outside garbage can by a specialized company. In this regard, the concern is that the management of chemical waste (ink cartridges, insecticide cans, air freshener cans, etc.) is not separate from other waste.

4. Existence of a mechanism to manage complaints or concerns

The mechanism for managing staff and user complaints is that laid down by Law No. 2013-002 of 21/01/2013 on the general status of the Togolese civil service.

5. Gender Policy and Management of Sexual Harassment, Sexual Abuse and Gender Based Violence

Women represent 25% of the DGPS workforce. Staff (civil servants) are made available to the sectoral ministries by the Ministry in charge of the civil service, which is responsible for recruitment according to needs. The staff is then assigned or transferred by the sectoral minister to the different services. To manage conflicts, including those relating to abuse and gender-based violence, the general statute of the civil service has, in article 161, "established a mediation commission within the superior council of the civil service, as well as a social mediation committee in each joint administrative commission. This does not exclude recourse to other means of conflict resolution.

5.2.7. Results of the ANID consultation

1. Integration of environmental and social aspects in their operations

- Information/awareness, education and communication on environmental and social standards,
- Public consultations with stakeholders
- Inclusion of vulnerable groups in public consultations
- Monitoring the implementation of environmental and social safeguard instruments
- Implementation of the Complaint Management Mechanism
- Existence of the code of conduct and signed by the staff
- Implementation of the national plan to combat GBV
- Taking into account the gender and GBV/ASR/HS aspects of the **National Policy for Gender Equity and Equality**
- Inclusion of vulnerable populations, women, children, people with disabilities, the elderly in the **National Grassroots Development Policy (PNDB)**
- Consideration of the law against child exploitation

2. Does the existing equipment have sufficient capacity to receive the data from this PforR?

The existing equipment has the capacity to receive PforR data. In terms of computer equipment, all agents have computers and adequate work tools. Digital work environments are available to facilitate

the flow of information. In addition, additional equipment is being delivered, including servers and other network equipment.

3. In case of failure how is the maintenance done?

At this stage, the equipment acquired has not suffered any breakdowns. They are recent. However, in the event of a breakdown, a specialized company will be called in if it cannot be solved internally.

4. E-waste management

On a practical level, empty ink cartridges are stored and collected by the supplier for destruction and recycling.

6. Legal and regulatory framework related to ANID's mission

Existence of a legal and regulatory framework conducive to the implementation of the project :

- Law No. 2022-010 of June 24, 2022, amending Law No. 2020-009 of September 10, 2020, on the biometric identification of individuals in Togo;
- Law n°2019-014 of October 29, 2019 on the protection of personal data
- Law n°2018-026 of December 7, 2018 on cybersecurity and the fight against cybercrime in Togo, amended on June 22, 2022;
- Decree 2022-094 of September 09, 2022 on the modalities, registration, rectification and updating of demographic and biometric data conditions of use of the Unique Identification Number (NIU) ;
- Decree No. 2019-026/PR of February 13, 2019 establishing the National Cybersecurity Agency (ANCy);
- Decree No. 2020-093/PR of November 12, 2020 establishing the National Identification Agency (ANID)

7. Protection of personal data

- Existence of the law n°2019-014 of October 29, 2019 on the protection of personal data,
- Creation of the Personal Data Protection Authority (IPDCP) by Decree N°2020-111 /PR of December 09, 2020.

8. MGP in place

There is the complaint management mechanism of the WURI-Togo project. It has been published on the website of the Ministry of Digital Economy and Transformation.

In addition, a suggestion box is being designed for the staff. Satisfaction surveys are organized every 6 months with the staff.

9. Difficulties encountered Proposal for improvement

No difficulties encountered at this time with respect to environmental and social safeguards at this stage of the project.

10. Health and safety of ANID workers (risk of exposure to screens)

ANID staff are covered by health insurance.

11. Gender policy

- Implementation of the national plan to combat GBV ;
- Taking into account gender and GBV/SEA/SH aspects of the National Policy for Gender Equity and Equality in Togo;

- Inclusion of vulnerable populations (women, children, disabled, elderly, etc.) in line with Togo's National Grassroots Development Policy (PNDB).

ANID does not have a gender-specific policy. Recruitment is done in accordance with the provisions of public procurement. However, a strategy to encourage female candidates is put in place with the staff who are called to sensitize their female acquaintances on job offers.

In addition, ANID has set up an internship program for young people with 4 interns, 50% of whom are women.

12. ANID's experiences with World Bank and other donors' projects

Implementation of the WURI-Togo project under World Bank funding.

5.2.8. Results of the ATD consultation

1. Mission and organization

The ATD accompanies and contributes to the implementation of various actions for the digital transformation of Togo. Its missions are set out in Decree No. 2021-102 of September 29, 2021 on the creation, powers, organization and operation of the Togo Digital Agency (ATD). This Decree has been published in the Official Gazette 66^e Year N°46 Bis of November 19, 2021 (page 20).

2. Feedback on NOVISSI

Background: NOVISSI is a 100% digital money transfer project, from the beneficiary's registration to the payment of the aid through intermediate steps such as eligibility determination, etc.

Observed areas of improvement:

- ✓ The need for a **universal biometric identity**: In fact, the identity document used at the launch of the program was the voter's card, because it was the most accessible card for everyone because it is issued free of charge (approximately 93% of the population have a voter's card, compared to 30% who have an identity card).
- ✓ This experience demonstrates the need for and added value of a project such as the e-ID (1^{er} project of the government's roadmap) that will be made available to the entire Togolese population to reduce the risks of exclusion.
- ✓ The need for **access to terminals**: According to statistics, more than 75% of the population has access to at least a 2G phone. But to reduce the risk of exclusion, it is important to have a policy to accelerate the high adoption of phones in rural communities.
- ✓ Through the FSB-NOVISSI project (phase 2 of the FSB project), there is a component for distribution of telephones to poor women.
- ✓ Reflections must be conducted on the approaches, the types of initiatives to be carried out as well as the economic model to be adopted to ensure the adoption of the phones in all the economic and social layers of the thing.
- ✓ The ideal situation sought is an individual, an identity, a phone and a phone number to access public and social digital services.
- ✓ The provision of terminals must be accompanied by training programs on the use of telephones (digital literacy), on financial inclusion, etc.

Need for the state to have a single social register / population and household register to improve targeting of beneficiaries and reach the truly vulnerable

In NOVISSI, we used two different targeting methods.

The first method at the very beginning of the program in April 2018 was occupation-based, given that the program aimed to help people in the informal sector because their sources of income were impacted by the restrictive measures put in place. The second method used satellite imagery to conduct poverty mapping of Togo and data analysis to estimate and identify people likely to earn less than \$1.25 per day.

3. Does the existing equipment have sufficient capacity to receive the data from this PforR?

If you are talking about equipment, in terms of servers, that is to say, resources for hosting data, we believe that in order to answer this question in a fairly rigorous manner, we must first determine the storage capacity required for the PforR project, once the actual components of the project have been definitively determined.

However, the ANID, within the framework of the e-ID project, is going to acquire a private cloud that will be hosted at the Lomé Data Center for the hosting of the e-ID project data.

ATD is also working on the sizing of a national cloud to host data from the digitization of administrative procedures. According to the forecasts this dimensioning for the needs in hosting necessary for the digitalization of the public services should be available by the end of 2023, beginning of 2024.

4. In case of failure how is the maintenance done?

It all depends on the level at which the failure is located. If the failure is located at the application level (the applications or platforms with which the user interacts), the ATD for each of the platforms or services under its responsibility has a level 2 support team to investigate the origin of the failure and to solve the problem.

If the failure is related to connectivity, we work with the teams of the Société d'Infrastructures Numériques which manages the eGouv network that serves the Togolese administration.

If the outage affects the data hosting equipment, we have a DevOps team that investigates the outage and fixes it.

5. Operators used

If by operator, you mean the mobile operators who are involved in the NOVISSI program, then there is Togocom and Moov which are the only two operators on the market.

6. Existence of a mechanism to manage complaints or concerns

We work with (private sector) call centers to collect complaints and address user concerns. This is level 1 of the support mechanism.

If the call center does not have the answer and cannot solve the problem at its level, the complaint is taken to level 2 (which is often a technical level of the entity that operates the platform and ensures its maintenance), then to level 3 which is a little more administrative level.

7. Types of complaints recorded

In NOVISSI, there were many complaints related to eligibility, in the sense that some citizens did not understand why they are not eligible.

8. Integration of environmental and social aspects in the activities (Occupational health and safety policy);

ATD is in the process of structuring its team. And in accordance with current legislation, it is required to declare its personnel to the National Social Security Fund for contractual workers. The civil servants are declared to the Pension Fund.

9. The existence of GRM internally

Since the ATD was created in 2021 and is expected to deliver technical results by December 2021, the ATD has focused primarily on technical capacity, which is still being strengthened. This year, having benefited from the state budget, the Agency is working on strengthening its administrative capacities, in particular through the recent recruitment of an RAF.

This will be followed by efforts to initiate the establishment of various internal mechanisms that meet the good practices and standards enacted and implemented in the Togolese public administration.

10. Gender Policy and Sexual Harassment

Since the ATD was created in 2021 and is expected to deliver technical results by December 2021, the ATD has focused primarily on technical capacity, which is still being strengthened. This year, having benefited from the state budget, the Agency is working on strengthening its administrative capacities, in particular through the recent recruitment of an RAF.

This will be followed by efforts to initiate the establishment of various internal mechanisms that meet the good practices and standards enacted and implemented in the Togolese public administration.

11. The difficulties

In the implementation of all digital projects, whether it is NOVISSI or any other project, we often note difficulties related to change management for the adoption of new tools both with the implementing entities and with the end users.

However, these difficulties are mostly solved through sessions

A delay in administrative structuring due to the fact that, in accordance with the various results objectives resulting from the different governmental seminars, technical structuring took precedence over administrative structuring.

12. Suggestions for improvement

Concerning the NOVISSI project, see answer 1

When it was created 15 months ago, the Agency focused primarily on structuring and strengthening technical capacities to meet the various digitalization objectives assigned to it during the various government seminars.

It is now working to strengthen administrative capacity.

5.2.9. Results of the ANADEB consultation

1. Integration of environmental and social aspects in their operations

ANADEB has specialists in environmental and social safeguards who accompany it in the implementation of its projects. They are :

- A specialist in environmental protection
- A social safeguard specialist
- Two assistants to the environmental safeguard specialist
- Two assistants to the social safeguard specialist

In addition, there were:

- Preparation of strategic documents: 2 CGES, 2 CPR for the EJV and FSB projects and 1 CGES (updated) for the FA-FSB project
- Development of PEES, CGES, CPR, PMPP and PGMO for the COSO project
- Environmental and social screening of sub-projects and IGAs

- Development and implementation of operational ESMPs and RMPs for the EJV and FSB microprojects
- Preparation of quarterly and annual reports on the implementation of the CGES, CPR, PEES, etc.
- Carrying out the environmental and social audit of the implementation of CGES and CPR of the EJV and FSB projects
- Development and implementation of operational/worksite ESMPs and RMPs, PPSPS, PPGED, PAE for COSO project sub-projects
- Development and implementation of Complaint Management Mechanisms (CMMs)
- Elaboration and monitoring of the application of codes of conduct
- Etc.

2. Decentralization of the agency to the most remote households

ANADEB is represented from the national level to the most remote villages of Togo.

- ANADEB Headquarters,
- Regional branches of ANADEB in the 5 regions,
- Grassroots Development Support Agents (AADB) in all prefectures of Togo
- Grassroots Development Support Agents (AADB) in the communes
- Community animators in the villages concerned by the projects piloted by ANADEB

3. Collaborative actors

- National level: the various ministries (Ministry of Education, Ministry of Health, Ministry of the Environment, Ministry of Agriculture, Ministry of Water, Ministry of Rural Trails, Ministry of Social Action, Ministry of Territorial Administration, etc.) with their deconcentrated services (technical directorates at the regional and prefectural levels; the communes, etc.)
- Technical and Financial Partners (World Bank, French Development Agency, ICRS...)
- Civil Society Organizations/CSOs: NGOs and associations
- Communes, Cantonal Development Committees (CCD), Village Development Committees (CVD), Neighborhood Development Committees (CDQ)

4. The resources available

ANADEB has different types of resources:

- Human Resources
- Financial resources: State and PTF
- Material resources: car fleet, computer and office equipment

5. Health and safety of ANADEB workers

- ANADEB staff

The employees have health insurance, some are declared to the CNSS, the pension fund and other insurance. ANADEB itself provides its staff with the appropriate PPE and ensures that they are worn effectively.

Minimum conditions for which ANADEB ensures the respect of the personnel of the companies that work with it:

- ANADEB/ The project manager and the company must take note of the nearest equipped health center, as well as the police station and/or police station whose jurisdiction covers the microproject site before the start of work, in order to refer to them in case of need;
- ANADEB/ The contractor and the company in collaboration with the local authorities including the CVD, must find out about any potential source of danger and take the necessary measures before starting the work.

6. Gender policy

The Ministry of Grassroots Development, Youth and Youth Employment has a gender unit and there is a gender focal point at ANADEB.

7. Feedback mechanism for grassroots concerns

ANADEB has a complaint management mechanism (CMM) including the one related to GBV/ASV/HSV for each project:

A PMM for the EJVS, FSB, FA-FSB, COSO, ... Each PMM has several levels of complaint management committees starting at the grassroots level, with the direct beneficiaries of the project, then at the regional or prefectural, central and national levels.

ANADEB has a toll-free number (8212). This number is well known and used by citizens, especially beneficiaries of projects to expose their concerns, suggestions, complaints, etc. Through this number, the various actors can confidentially report complaints that have not been reported to the bodies in place, as far as non-sensitive complaints are concerned.

Sensitive complaints have two levels, local and national.

In addition, this PMM requires each provider company to develop and implement the complaint management and worker empowerment mechanism.

8. Management of vulnerable persons

The projects managed by ANADEB include mechanisms to take into account the vulnerable. There have been PMT surveys conducted by INSEED, an accredited institution. The questionnaires developed for the identification of poor people and households strongly take into account vulnerability in all aspects of the term. People with disabilities, women, widows, the elderly, etc. are taken into account.

9. Management of exclusions

The existing PMMs are implemented to avoid exclusions, among other things. They allow each actor to denounce cases of exclusion in order to correct them.

In addition, ANADEB organizes targeting sessions of beneficiary villages among the poorest cantons identified by the Ministry of Planning.

10. Feedback on the FSB project activities with regard to the consideration of social and environmental aspects

Example of feedback.

For example, in the FSB parent project, each village complaint management committee had three members (Village Chief: Committee Chair, VDC Chair: Member, VDC Secretary: Committee Secretary) who could be exclusively men. This composition prevented some women from going to the men to complain. After this observation, it was decided to integrate two (02) women into each village and cantonal complaints management committee. This change, which involved more women, made it possible to collect more complaints from women.

11. Shock management

ANADEB has mechanisms in place to anticipate and manage cases of shock. These include PMMs and codes of conduct.

Management of GBV/HS

Mapping of prevention and care facilities for GBV/ASA/HS and ECV victims A contract will be signed with the best

- At the ANADEB level, for any project financed by the World Bank, mechanisms for managing complaints and the GBV/HS Action Plan are systematically developed and implemented in order to guide awareness-raising actions and the management of GBV/HS complaints;
- Elaboration of codes of good conduct which are signed by the stakeholders,
- In order to manage complaints related to GBV/HS, we have mapped out the institutions that prevent GBV and provide support to GBV/ASV survivors. These institutions receive these types of complaints and provide support to survivors.
- In addition to these structures, there is a toll-free number (8212) that allows the various stakeholders to confidentially report complaints of GBV that have not been reported to the health care structures.
- Complaints management committees are trained and sensitized on the fact that they should not handle GBV/HS complaints.

Awareness on GBV/HS

- Civil society organizations have also been identified, for example, in the FA-FSB project, and they support community mobilization actions on the fight against GBV/HS
- Spots and communication tools that take into account the prevention of GBV/HS, codes of conduct and the reporting of GBV/HS-related concerns to GBV facilities are developed and broadcasted on some community radio stations.

12. Typology of IGAs

IGAs from the Agriculture sector, IGAs from the Livestock sector, IGAs from the Handicrafts sector, IGAs from the Processing sector, IGAs from the Traditional Trade/Table Trade sector, IGAs from the Shop Trade sector and IGAs from other sectors

13. Gender condition on previous social nets

Women are usually designated as the primary recipients of cash transfers. The transfer money benefits all members of the household.

14. Evaluation of previous IGAs

Positive effects and impacts (11,500) IGAs on IGAs =74% of the youths having achieved monthly incomes ranging from 5,000 to 50,000. It is a good strategy to better accompany the youth. There are some who have IGAs with savings of 100 thousand.

15. Difficulties encountered

Follow-up of IGAs after the closure of the EJV project
 Insufficient qualified personnel
 Difficulty in getting strong support for training

16. Expectations and proposed improvement measures

- Consider human resources in the design of projects so that there are senior backups at the national level and juniors at the local level. The AADB that contribute to the success of the projects should be supported by the projects.
- Thinking more about human resources

5.2.10. Results of the consultation with a sample of social safety net/cash transfer project beneficiaries

A consultation was held with a sample of FSB project beneficiaries from the village of Kpetsou. A total of 41 beneficiaries from the village participated in the focus group.

The beneficiaries appreciated the FSB project implemented under the coordination of ANADEB. They have unanimously reported the benefits of the project social nets and basic services. Among the advantages are the following

- Poverty reduction in beneficiary households
- The rehabilitation of the health center of their locality,
- The school canteen is still functional
- Accompaniment in income-generating activities in the agricultural, market gardening, livestock and handicraft sectors;
- Cash transfers have enabled some households to pay for their children's schooling, to have their child's birth certificate issued, to provide for food needs in the household, to pay for apprenticeships for their teenagers who wanted to learn a trade, and to lease cultivable land for farming activities.

In addition, some complaints were noted regarding the choice of beneficiaries. Indeed, according to the genesis of the FSB project, censuses were carried out. Those excluded from the project felt ignored and this led to indignation and complaints in the village; fortunately, the complaints management committee set up was able to handle these complaints. In addition to these types of complaints, there were also problems related to network coverage, which led to delays in the collection of funds.

Another category of excluded persons was reported. These are households that, although poor, refused to be enumerated at the time of the surveys for personal reasons. This category of excluded people, seeing that others were receiving cash transfers, wanted to be counted but it was too late.

5.2.11. Results of the consultation with a sample of NOVISSI beneficiaries.

A sample of NOVISSI beneficiaries was consulted as part of the environmental and social systems assessments. A total of 11 beneficiaries participated in the discussions. The exchanges revealed that the program is well appreciated by the beneficiaries. The transfers received have enabled households to meet the requirements of the COVID 19 pandemic mitigation measures. The funds received have helped boost trade for some and meet food needs for others.

However, some shortcomings were raised by the participants; these are

- Malfunction in the beneficiaries' registration mode: The registration mode for the NOVISSI program was registration by code on the two cell phone networks in Togo. The demand for registration was so high that there was a saturation in the new network coverage, which led to a slowdown in the registration process. For others it was necessary to try again and again before registering. Since the program coincided with the electoral census, and since it was necessary to register by the number of the voter's card, some individuals quickly had access to the number of the card of the people who are always posted in the census centers. In short, some individuals registered with the voter card numbers of others.
- The lack of network coverage penalized some beneficiaries who received the funds alert message but did not get the funds.
- Late payment
- Some people who did not have a voter's card felt marginalized

This situation created frustrations and complaints, unfortunately, according to the participants, there was no accessible channel to complain and make claims. The participants, based on the experiences of the NOVISSI program, made the following recommendations:

- + Implement the PforR ASTRE program in the coming days
- + Establish a fairly effective communication system for future programs including this ASTRE PforR
- + Involve local authorities down to the lowest level (prefect-canton chief-village chief-neighborhood chief-CVD-CDQ- association and women's group), religious authorities and teachers in the extension of future programs including this PforR ASTRE
- + Targeting those truly experiencing poverty in this ASTRE PforR
- + Increase the amount of cash transfers in future programs including this ASTRE PforR.

5.2.12. Results of the FETAPH consultation

FETAPH has never been associated with the identification and targeting of vulnerable people during the implementation of social protection projects financed by the World Bank. According to the management of the umbrella organization, social projects have not really taken into account people with disabilities. FETAPH, in achieving its objectives, faces difficulties at two levels, namely: the daily life of the disabled person in Togo and the functioning of FETAPH.

Daily life of the disabled person in Togo.

- ✓ Difficulties in accessing reception facilities for health services,
- ✓ Discrimination suffered by people with disabilities in health structures, especially women with disabilities in labour. The treatment given to these women does not respect their dignity.
- ✓ Rehabilitation services are expensive, leading to financial access difficulties.
- ✓ As the social protection system is contributory, the unemployed disabled person does not have health insurance.
- ✓ Other difficulties related to education, training and employment.

FETAPH organization

- ✓ Deficit in fundraising;
- ✓ Insufficient staff;
- ✓ Absence of an operational Complaints Management Mechanism.

In view of these difficulties, FETAPH pleads for the integration of the disabled person at all levels of social development in Togo. According to the FETAPH, to integrate people with disabilities, it is necessary to use the dual approach to disability.

Approach 1: Transversal and integrated consideration of disability ("disability main streaming"). It is a question of integrating the dimension of disability into policies, laws and projects. This is the global approach

Approach 2: Taking into account the specific needs of people with disabilities at all levels of society. It is the specific approach that makes it possible to find concrete solutions to the specific problems of the different categories of disability (physical, auditory, visual, psychosocial, intellectual). In addition, proposals for improvement measures for better inclusion of the disabled have been formulated as part of the implementation of this PforR Togo ASTRE. It is :

- ✓ Develop specific indicators on disability inclusion and use them systematically in interventions
- ✓ Consult and involve FETAPH in all projects and programs financed by the World bank
- ✓ Support FETAPH in its advocacy actions towards the State and partners for real consideration of disability at all levels,
- ✓ Include the disability and accessibility dimension in the projects and programs financed by the WB,
- ✓ Highlight the statistics on people with disabilities taken into account by the projects and programs financed by the WB
- ✓ Strengthen the capacities of disabled people's organizations to promote their rights
- ✓ Popularize the use of sign language to facilitate communication with deaf people
- ✓ Develop and strengthen functional rehabilitation services that are geographically and financially accessible to people with disabilities
- ✓ Support the institutionalization of inclusive education in Togo
- ✓ Support advocacy for the creation of a National Fund for the training and professional integration of people with disabilities in Togo
- ✓ Support the updating of the legal, legal and regulatory framework relating to people with disabilities in Togo
- ✓ Ensure the recruitment of people with disabilities in projects and programs supported by the WB in Togo

5.3. Appendix 3: Risk level classification table

Probability	Amplitude		
	slight	Moderate	high
Unlikely	Very low risk	Very low risk	Medium risk
Unlikely	Very low risk	Medium risk	Very high risk
probable	Low risk	High risk	Very high risk
Very likely	Low risk	Very high risk	Very high risk

5.4. Annex 4: World Bank Core Principles

Table 11 PforR core principles

Fundamental Principle	Title and content
Basic principle 1	General principle of environmental and social management. This principle is intended to promote environmental and social sustainability in the design of the Program; to avoid, minimize, or mitigate negative impacts; and to promote informed decision-making regarding the environmental and social impacts of the Program.
Fundamental Principle 2	Natural habitats and physical cultural resources. This principle is intended to avoid, minimize, or mitigate adverse impacts of the program on natural habitats and physical cultural resources.
Fundamental Principle 3	Public and worker safety These principles are intended to promote public and worker safety with respect to potential hazards associated with: (a) construction and/or operation of facilities or other operational practices under the Program; (b) exposure to toxic chemicals, hazardous wastes, and other hazardous materials under the Program; and (c) reconstruction or rehabilitation of infrastructure located in hazard-prone areas.
Fundamental Principle 4	Acquire land. This principle aims to manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement, and helps affected people improve, or at least restore, their livelihoods and quality of life.
Fundamental Principle 5	Indigenous peoples and vulnerable groups. This principle aims to give due consideration to cultural appropriateness and equitable access to program benefits, with particular attention to the rights and interests of Aboriginal peoples and the needs or concerns of vulnerable groups.
Fundamental Principle 6	Social conflicts. This principle aims to avoid the exacerbation of social conflicts, especially in fragile situations, post-conflict areas or areas subject to territorial conflicts.