

## MINISTRY OF DIGITAL ECONOMY AND DIGITAL TRANSFORMATION (MENTD)

## TOGO DIGITAL ACCELERATION PROJECT P179138

**Negotiations Version** 

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

September 2024

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## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

- 1. The Government of the Republic of Togo (hereinafter referred to as the Recipient) will implement the "Digital Acceleration Project in Togo (P179138, the Project), in association with the Ministry of Digital Economy and Digital Transformation (MENTD), the Ministry of Higher Education and Research, the Ministry of Primary and Secondary Education (MEPS), the Minister of Technical Education, The Ministry of Vocational Training and Apprenticeship, the Ministry of Health and Public Hygiene (MSHP), the Ministry of Universal Access to Health Care and Health Coverage (MAUSCS), the Ministry of Territorial Administration, Decentralization and Customary Chiefdom (MATDCC), the Ministry of Economy and Finance (MEF), the Ministry of Environment and Forest Resources (MERF), Agence Togo Digital (ATD) and Société des Infrastructures Numériques (SIN), as set out in the Financing Agreement. The International Development Association, acting as an accredited entity (the Association), has agreed to provide financing for the Project as set forth in the agreement referred to above.
- 2. The Recipient shall ensure that the Project is implemented in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan ("ESCP"), in a manner acceptable to the Association. The ESCP forms part of the Financing Agreement. Unless otherwise specified in this ESCP, the capitalized terms used therein have the meanings ascribed to them in the referred agreement.
- 3. Without limitation to the foregoing, this ESCP sets out the material measures and actions that the Recipient will implement or cause to be carried out, including, if applicable, the timeframe for such actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance mechanism. The ESCP also sets out the environmental and social instruments to be adopted and implemented under the Project, to be subject to prior consultation and disclosure, in accordance with the ESSs, and in form and substance acceptable to the Association. Once adopted, such environmental and social instruments may be revised from time to time with the prior written agreement of the Association.
- 4. As agreed between the Association and the Government of Togo, this ESCP may be revised from time to time during Project implementation, as necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to an assessment of Project performance. In such circumstances, the Recipient, through MENTD, and the Association agree to revise the ESCP accordingly, through an exchange of letters signed between the Association and the MENTD. The Recipient shall promptly disclose the revised ESCP.

MATERIAL MEASURES AND ACTIONS	TIMELINE/ TIMELINE	<b>RESPONSIBLE ENTITY</b>
MONITORING AND REPORTING		
<ul> <li>Has REGULAR REPORTING preparing and submitting to the Association on a regular basis monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, the status of preparation and implementation of the environmental and social instruments, including health and safety, required under the ESCP, Stakeholder engagement activities and functioning of the Grievance Redress Mechanism(s) (GRM) addressing Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) and measures to address SEA/SH.</li> <li>B INCIDENTS AND ACCIDENTS</li> </ul>	Submit quarterly reports to the Association, throughout Project implementation after the Effective Date. Transmit each report to the Association not later than 15 days after the end of each quarter. <u>Notify the Association of the incident</u> <u>or accident no later than 48 hours after</u>	Project Implementation Unit (PIU) within MENTD. PIU within MENTD.
affected communities, the public or workers, including, inter alia, SEA, (SH) and accidents resulting in death or serious or multiple injuries, alleged violations of requirements and working conditions, exclusion and discrimination of populations. Provide sufficient detail on the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or to be taken to address it, and any information provided by any contractor and the supervising entity, if applicable. For SEA/SH complaints, no identifying information about the complainant should be included in the notification. Any notification of SEA/SH/VCE incidents will follow an information sharing protocol to respect the confidentiality and safety of the survivor. A standard incident/accident reporting form is sent by the Recipient to all subcontractors and suppliers. This form does not apply to SEA/SH incidents. Subsequently, at the request of the Association, the Recipient shall prepare a report on the incident or accident and propose measures to remedy it and to prevent its recurrence.	becoming aware of it and no more than 24 hours in the case of fatalities and allegations of SEA/SH. Thereafter, submit a report to the Association no later than 5 working days after becoming aware of the incident or accident. Ensure that survivors of SEA/SH/VCE are provided with medical, psychosocial support, and legal assistance by referring them to the relevant SEA/SH/VCE service providers in the project area within 48 hours. Reporting of SEA/SH cases should be based on the principle of confidentiality and security of the survivor's identity and should be stored in a secure location with limited access. This systematic reporting system should remain in place throughout Project implementation.	

	MATERIAL MEASURES AND ACTIONS	TIMELINE/ TIMELINE	<b>RESPONSIBLE ENTITY</b>
С	MONTHLY CONTRACTOR REPORTS	Submit monthly reports to the	PIU within MENTD
	Require contractors and supervising firms to produce monthly monitoring reports on	Association upon request and as	Contractors and prime
	ESHS performance in accordance with the indicators specified in the respective	annexes to the reports due under Action	contractors
	bidding documents and contracts, and submit these reports to the Association.	A above.	
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D	NOTIFICATIONS OF DAAB REVIEW OF CONTRACTOR'S	No later than seven (07) days after the	- <u>Ministry of Economy and</u>
	COMPLIANCE WITH SEA/SH-PREVENTION AND RESPONSE	issuance or receipt, if any, of the	Finance
	OBLIGATIONS	relevant document (i.e., request to the	<u>-</u> PIU within the MENTD.
	Notify the Association of any request submitted to the Dispute Drevention and	DAAB, DAAB decision, notice of dissatisfaction, notice of	
	Notify the Association of any request submitted to the Dispute Prevention and Resolution Board (DAAB) to initiate a process to review contractors' compliance with	commencement of emergency/full	
	obligations to prevent or respond to SEA and/or SH specified in the works contract	arbitration, emergency/full arbitration	
	with said contractors; and if any such request is made, notify the Association: (i) of	order, if applicable).	
	the DAAB's decision with respect to such request; (ii) the supplier's notice, if any, of	<u>order, ir applicable).</u>	
	dissatisfaction with the DAAB's decision; (iii) any notice received at the		
	commencement of an emergency arbitration proceeding or a full arbitration		
	proceeding regarding the DAAB's decision and (iv) the resulting emergency arbitration		
	order and/or the resulting full arbitration order, if any		
ESS1: A	SSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS	AND IMPACTS	
1.1	ORGANIZATIONAL STRUCTURE	The PIU should be in place no later	MENTD.
	Establish and maintain the PIU responsible for the management of environmental,	than effectiveness of the project with	
	social, health and safety issues and staffed with qualified staff and adequate resources	key personnel, including the	
	to support the management of the Project's ESHS risks and impacts, including (i) an	environmental specialist and the social	
	environmental specialist and (ii) a social development and gender specialist.	development and gender specialist, as	
	Recruit a security consultant as required to be responsible for all aspects of security	provided for in the financing	
	monitoring and management, including liaison with armed forces, local communities,	agreement, and maintained throughout	
	and security audits at project sites.	project implementation.	
	The terms of reference and qualifications of all applicants shall be subject to the	Hire a security consultant if necessary.	
	Association's no objection procedure.		

	MATERIAL MEASURES AND ACTIONS	TIMELINE/ TIMELINE	<b>RESPONSIBLE ENTITY</b>
1.2	ENVIRONMENTAL AND SOCIAL INSTRUMENTS	- Adopt the ESIA and ESMP prior to	PIU within MENTD.
	- Adopt and implement, as necessary, an Environmental and Social Impact	the start of any activity requiring the	
	Assessment (ESIA) and prepare and implement the corresponding Environmental	preparation of such an instrument, and	
	and Social Management Plan (ESMP) for subprojects/activities that require it,	thereafter implement the ESIA and	
	including subprojects under Components 1 and 2 of the Project, in accordance with	ESMP, including specific plans	
	the relevant ESSs. The ESMP will be followed by specific plans to be prepared by	throughout Project implementation.	
	suppliers (C-ESMP, Specific Waste Management and Disposal Plan (PPGED),	- Adopt the ESMF prior to project	
	Environmental Assurance Plan (PAE), Safety and Health Protection Plan (PPSPS)).	<u>appraisal.</u>	
		- Adopt the SEA/SH prevention and	
	- Adopt and implement an Environmental and Social Management Framework	management action plan no later than	
	(ESMF) for the Project, in accordance with the relevant ESSs.	three (3) months after the effective date	
		of the Project	
	- Adopt and implement the following risk assessment and management tools and	- Adopt the PGS no later than the	
	instruments for the Project, in accordance with the relevant ESSs and the	effective date of the Project.	
	Environmental, Health and Safety Guidelines (ESHS):		
	✓ an Environmental and Social Management Framework (ESMF);	Require environmental compliance	
	✓ SEA/SH Prevention and Management Action Plan	certificates on ESIAs and ESMPs	
	✓ Safety Management Plan (SMP);	before works begin.	
	✓ E&S audits (if required).		
1.3	CONTRACTOR MANAGEMENT	When preparing the respective	PIU within MENTD.
	Incorporate relevant aspects of the ESCP, including relevant environmental and social	procurement documents. Supervision	
	instruments, labor management procedures, and code of conduct, in the ESHS	of contractors throughout Project	
	specifications of the bidding documents issued to contractors and project managers.	implementation.	
	Then, ensure that these contractors and their subcontractors comply with the ESHS		
	specifications of their respective contracts.		
1.4.	TECHNICAL SUPPORT	Throughout Project implementation.	PIU within MENTD.
	Ensure that any consultations, studies (including feasibility studies, if any), capacity		
	building, training, and any other technical assistance activities under the Project are		
	carried out in accordance with terms of reference acceptable to the Association and		
	consistent with the ESSs. Subsequently, ensure that the outputs of these activities are		
TRE2 I	in line with the terms of reference.		
E352:1	LABOR AND WORKING CONDITIONS		

	MATERIAL MEASURES AND ACTIONS	TIMELINE/ TIMELINE	<b>RESPONSIBLE ENTITY</b>
2.1	LABOR MANAGEMENT PROCEDURES	Adopt LMPs prior to Project Appraisal	PIU within MENTD.
	Adopt and implement labor management procedures (LMP) established for the	and thereafter implement LMP	
	Project, including, inter alia, provisions on working conditions, management of the	throughout Project implementation.	
	employer-worker relationship, occupational health and safety (including personal		
	protective equipment and emergency preparedness and preparedness and response),		
	Code of Conduct (including on SEA/SH), forced labor, child labor, migrant workers,		
	grievance mechanism for project workers, and requirements for contractors,		
	subcontractors, and contractors.		
2.2.	GRIEVANCE MECHANISM FOR PROJECT WORKERS:	Adopt the GRM prior to hiring workers	
	Establish and operationalize a Grievance Redress Mechanism (GRM) for Project	for the Project, and thereafter maintain	PIU within MENTD.
	workers, as described in the LMP and in accordance with Togolese labor legislation	and operate throughout Project	
	and ESS2.	implementation.	
	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEME		
3.1	WASTE AND HAZARDOUS MATERIALS MANAGEMENT PLAN	Measures related to waste	PIU within MENTD.
	Adopt and implement a waste management plan (WMP) to manage hazardous and	management/DMP will be	Ministry of Environment
	non-hazardous waste, including e-waste, in accordance with ESS3. Specific measures	incorporated into the ESMF, to be	and Forest Resources
	will also be included in sub-project ESIA reports and ESMPs.	adopted prior to project appraisal, and	(MERF)
		the ESIAs and ESMP prior to the	Agence National de
		commencement of works.	Gestion de
		These waste management measures will	l'Environnement (ANGE).
		be maintained and implemented	
		throughout Project implementation.	
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND	Same timeframe as for the adoption and	PIU within MENTD.
	MANAGEMENT	implementation of the ESMP, and	
	Integrate resource efficiency (raw materials, energy and water), pollution prevention	implementation of measures	
	and management measures in the ESMP to be prepared under action 1.2 above for	throughout Project implementation.	
	subprojects/activities		
	COMMUNITY HEALTH AND SAFETY		
4.1	TRAFFIC AND ROAD SAFETY	Same timeframe as for the adoption and	PIU within MENTD.
	Include traffic and road safety risk management measures in the ESMP to be	implementation of the ESMP.	Entrepreneurs
	developed under action 1.2 above.		
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage the risks and impacts	Prior to the start of construction	PIU within MENTD
4.2	that Project activities may generate on local populations, including risks related to	rifor to the start of construction	Entrepreneurs
	labor influx and migrant workers, GBV/SEA/SH and violence against children (VIE),		Oversight mission
	behavior of Project workers in relation to respect of community customs, security		Oversignt mission
	and HIV/AIDS risks, labor influx, emergency response, and include mitigation		
	measures in the ESMPs to be prepared in accordance with the ESMF.		
	measures in the ESMPs to be prepared in accordance with the ESMF.		

	MATERIAL MEASURES AND ACTIONS	TIMELINE/ TIMELINE	<b>RESPONSIBLE ENTITY</b>
4.3	GBV/SEA/SH RISKS	Not later than six (6) months after the	PIU within MENTD.
	Adopt and implement a SEA/SH and VAC action plan also referred to in the LMP	effective date of the project, updated as	Entrepreneurs
	and the GRM that is appropriate and proportionate to the level of moderate risk in a	needed and implemented throughout	Health facilities
	manner acceptable to the Association. The mitigation plan will be developed or	the project life-cycle.	Schools
	updated in accordance with national provisions, the conventions ratified by Togo and	Codes of conduct will be signed by all	Town halls
	the guidelines of the Good Practice Note on Gender-Based Violence.	workers at the same time as contracts	Ministère de l'Action
	Ensure that all bidding documents, works contracts, or service contracts of	are signed	Sociale, de la Solidarité et
	contractors, subcontractors, or consultants include the Codes of Conduct for the		de la Promotion de la
	project to be given to all project workers for signature.		Femme
4.4	SAFETY MANAGEMENT	Adopt the PGS before calling in	Entrepreneurs (own
	Assess and implement measures to manage Project security risks, including risks	security personnel and thereafter	budget)
	associated with the use of security guards to protect project workers, sites, assets and	throughout project implementation.	Oversight Entities
	activities as defined in the Safety Management Plan (SMP), based on the principles of	The action plan will be updated as	
	proportionality and good international industry practice (GIIP) as well as the	necessary, based on changes in the	PIU and Ministry of
	applicable law on the recruitment, rules of conduct, training, equipment, and	security situation in the sub-project	Security and Civil
	monitoring of such personnel.	areas.	Protection and the
			relevant security or
			military unit.
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4.5	USE OF THE DEFENCE AND ARMY FORCES	Complete points (a), (b), (c), and (d)	PIU
	Ensure that the following measures are taken prior to involving the Recipient's	before deploying defense and security	Ministry of Defense
	Defence and Security Forces in the implementation of Project activities to ensure the	forces under the project and ensure	-
	safety of Project workers, sites and/or assets, in accordance with the ESSs:	implementation throughout project	
	a. Assess and implement measures to manage the security risks associated with	implementation.	
	the use of the Defence and Security Forces (FDS) as set out in the Security	For items (e) and (f) as outlined in	
	Management Plan, based on the principles of proportionality, GIIP and	actions 10.1 and 10.2 respectively.	
	applicable law regarding screening, recruitment, rules of conduct, training,	Notify the Association after learning of	
	equipping and monitoring the Defense and Security Forces;	the concern or grievance within the	
	b. Adopt and implement standards, protocols and codes of conduct for the	timeframe specified in action B above.	
	selection and employment of Defense and Security Forces under the Project,	For (g) within the timeframe requested	
	and conduct background checks on its personnel to ensure that they have not	by the Association.	
	engaged in past unlawful or abusive behavior, including sexual exploitation		
	and abuse; sexual harassment or excessive use of force.		
	c. Sign a memorandum of understanding with the Ministry of State, Ministry of		
	Defense, and the Defense and Security Forces, which sets out the modalities		
	for the employment of the Defense and Security Forces under the Project,		
	including the relevant actions and measures provided for in this ESCP;		
	d. Ensure that the Defence and Security Forces receive appropriate instruction		
	and training, prior to deployment and on a regular basis, in the use of force		
	and appropriate conduct (including with regard to civilian-military relations,		
	sexual exploitation and abuse, sexual harassment and other relevant topics),		
	as outlined in the Safety Management Plan;		
	e. Ensure that stakeholder engagement activities under the Stakeholder		
	Engagement Plan (SEP) include a communication strategy on the		
	participation of the Defence and Security Forces in the Project;		
	f. Ensure that all concerns or complaints regarding the conduct of the Defence		
	and Security Forces are received, investigated and recorded (taking into		
	account the need for confidentiality), addressed through the Project's		
	grievance mechanism (see action 10.2 below), in accordance with ESS4 and		
	ESS10. Notify the Association after learning of the concern or complaint, in		
	accordance with action B above; and		
	g. Upon the Association's written request, after consultation with the Recipient:		
	(i) promptly appoint a monitoring consultant, with terms of reference,		
	qualifications and experience satisfactory to the Association, to visit and		
	observe the Project area where the Defense and Security Forces are deployed, gather relevant data and communicate the same to stakeholders and		
	beneficiaries; (ii) request the monitoring consultant to prepare and submit		
	monitoring reports, which shall be promptly forwarded to the Association		
L	inomoring reports, which shall be promptly forwarded to the Association		
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and discussed with the Association, as may be requested by the Association following review of the reports of the monitoring consultant.       Image: Constraint of the monitoring consultant.         ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT       Adopt and disclose the RPF prior to policy Framework (RPF) to guide the preparation of RAPs required for the Project in accordance with ESS5.       Adopt and disclose and implement a Resettlement policy Framework (RPF) to guide the preparation of RAPs required for the Project in accordance with ESS5.       Adopt and groups have equal access to resettlement oportunities and compensations and that all potential risks association.       Adopt and implement the respective RAPs, including ensuing that prior to taking possession of land and related taking possesion of land and related taking pos		MATERIAL MEASURES AND ACTIONS	TIMELINE/ TIMELINE	<b>RESPONSIBLE ENTITY</b>
ESS 5: IAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT       Image: Construction of the construction o				
5.1       RESETTLEMENT POLICY FRAMEWORK: The Government of Togo will develop, adopt, disclose and implement a Resettlement Policy Framework (RPF) to guide the preparation of RAPs required for the Project in accordance with ESS5. This plan will take into account gender issues, while ensuring that women and other vulnerable individuals and groups have equal access to resettlement opportunities and compensations and that all potential risks associated with resettlement are taken into account in the RPF, in a manner satisfactory to the Association.       Adopt and implement the respective RAPs, including ensuring that prior to taking possession of land and related assets, full compensation has been provided (if applicable) and displaced persons have been resettled and moving allowances provided.       PIU         5.3       GRIEVANCE REDRESS MECHANISM (GRM) Ensure that the resettlement-related Grievance Redress Mechanism (GM) is reflected in the project RF, site-specific RAs and SEP and takes into account SEA/SH. This GRM should be operational and accessible to all those affected by land acquisition and resettlement activities.       Adopt and implementation.       PIU         6.1       BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING Adopt and implement the biodiversity management measures specified in the ISMF in accordance with ESS6 and in a manner acceptable to the Association.       Same timeframe as for adoption and reservent that LESS and thereafter implementation of the specie ESMF and size-specific ESIAs, and thereafter implementation of the specie ES				
The Government of Togo will develop, adopt, disclose and implement a Resettlement Policy Framework (RPF) to guide the preparation of RAPs required for the Project in accordance with ESS5.       Project appraisal and be implemented throughout Project implementation.       Ministry of Economy and France         5.2       RESETTLEMENT PLANS Adopt and implement a Resettlement Plan (RP) for each Project activity for which the resettlement framework requires such action plan, in accordance with ESS5.       Adopt and implement the respective resettlement resettlement Plan (RP) for each Project activity for which the resettlement framework requires such action plan, in accordance with ESS5.       Adopt and implement the respective resettlement resettlement Plan (RP) for each Project activity for which the resettlement framework requires such action plan, in accordance with ESS5.       Adopt and implement the respective resettlement related Grievance Redress Mechanism (GM) is reflected in the project RF, site-specific RAs and SEP and takes into account SEA/SH. This GRM should be operational and accessible to all those affected by land acquisition and resettlement activities.       Prior to the start of implementation.       PIU         ESS 6. BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES       Same timeframe as for adoption and implementation of the project ESMF in accordance with ESS6 and in a manner acceptable to the Association.       Same timeframe as for adoption and implementation.       PIU Contractors/Subcontractor rs         6.1       BIODIVERSITY RISKS AND IMPACTS Adopt and implement the ESS6 and in a manner acceptable to the Association.       Same timeframe as for adoption and implementation of the project ESMF in accordance with ESS6 and in a manner a				
Policy Framework (RPF) to guide the preparation of RAPs required for the Project in accordance with ESS5.       throughout Project implementation.       Finance EXECUTIVE         This plan will take into account gender issues, while ensuring that women and other vulnerable individuals and groups have equal access to resettlement opportunities and compensations and that all potential risks associated with resettlement are taken into account in the RPF, in a manner satisfactory to the Association.       Adopt and implement the Resettlement Plan (RP) for each Project activity for which the resettlement framework requires such action plan, in accordance with ESS5.       Adopt and implement a Resettlement Plan (RP) for each Project activity for which the resettlement framework requires such action plan, in accordance with ESS5.       Adopt and implement a Resettlement Plan (RP) for each Project activity for which the resettlement framework requires such action plan, in accordance with ESS5.       Adopt and implement a Resettlement Plan (RP) for each Project activity for which the resettled and moving allowances provided.       Adopt and implement the resettlement related Grievance Redress Mechanism (GM) is reflected in the project RF, site-specific RAs and SEP and takes into account SEA/SH. This GRM should be operational and accessible to all those affected by land acquisition and resettlement activities.       Prior to the start of implementation.       PIU         Exest FITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES       Same timeframe as for adoption and implement the biodiversity management measures specified in the ESMF in accordance with ESS6 and in a manner acceptable to the Association.       Same timeframe as for adoption and implementation of these measures throughout project implementation.	5.1			
accordance with ESS5.       EXECUTIVE         This plan will take into account gender issues, while ensuring that women and other vulnerable individuals and groups have equal access to resettlement opportunities and compensations and that all potential risks associated with resettlement are taken into account in the RPF, in a manner satisfactory to the Association.       Adopt and implement the respective resettlement Plan (RP) for each Project activity for which the resettlement framework requires such action plan, in accordance with ESS5.       Adopt and implement the respective resettlement Plan (RP) for each Project activity for which the resettlement framework requires such action plan, in accordance with ESS5.       Adopt and implement the respective resettlement Plan (RP) for each Project activity for which the resettlement framework requires such action plan, in accordance with ESS5.       Adopt and implement the respective resettlement Plan (RP) for each Project activity for which the resettlement framework requires such action plan, in accordance with ESS5.       Adopt and implement the respective requires such action plan, in accordance with ESS5.       PUU         5.3       GRIEVANCE REDRESS MECHANISM (GRM)       Prior to the start of implementation of in the project RF, site-specific RAs and SEP and takes into account SEA/SH. This and resettlement activities.       Plu       EXECUTIVE         6.1       BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES       Same timeframe as for adoption and implement the biodiversity management measures specified in the ESMF in accordance with ESS6 and in a manner acceptable to the Association.       Same timeframe as for adoption and implementation.       PlU			Project appraisal and be implemented	
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<ul> <li>vulnerable individuals and groups have equal access to resettlement opportunities and compensations and that all potential risks associated with resettlement are taken into account in the RPF, in a manner satisfactory to the Association.</li> <li>5.2 RESETTLEMENT PLANS         <ul> <li>Adopt and implement a Resettlement Plan (RP) for each Project activity for which the resettlement framework requires such action plan, in accordance with ESS5.</li> <li>S.3 GRIEVANCE REDRESS MECHANISM (GRM)             <ul></ul></li></ul></li></ul>				
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	MATERIAL MEASURES AND ACTIONS	TIMELINE/ TIMELINE	<b>RESPONSIBLE ENTITY</b>
8.1	RISKS AND IMPACTS ON CULTURAL HERITAGE	Same timeframe as the ESMF and	PIU
	Introduce and implement measures for the management of cultural heritage (which	before works commence, and thereafter	MENTD.
	may be affected by the Project, if applicable), in the Project ESMF and in accordance	implement these measures throughout	
	with ESS8.	the project.	
8.2	CHANCE FINDS	Same timeframe as for preparation and	<u>PIU</u>
	Describe and implement the "chance find" procedures as outlined in the ESMF.	implementation of the project's	Contractors/Subcontracto
	Similarly, any ESIA to be prepared will include such a section on cultural heritage.	environmental and social management	<u>rs</u>
		framework and site-specific ESIA,	
		followed by implementation of	
		procedures throughout project	
		implementation.	
ESS9			
<b>D</b> 0040	Non applicable		
	STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		DUL
10.1	PREPARATION AND IMPLEMENTATION OF STAKEHOLDER ENGAGEMENT PLAN AND INFORMATION DISCLOSURE	Adopt the SEP before project appraisal,	PIU
	Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, in	and thereafter implement throughout	
	accordance with ESS10, which includes measures to provide stakeholders with timely,	project implementation	
	relevant, understandable and accessible information, and to consult with them in a		
	culturally appropriate manner, without manipulation, Interference, coercion, discrimination and intimidation.		
10.2	PROJECT GRIEVANCE MECHANISM (GM)	<b>D</b> 1 CDM 1 ( 1 00 1	DILI
10.2	Establish, disclose, maintain and operate an accessible GRM, to hear concerns and	Prepare the GRM no later than 90 days	<u>PIU</u>
	receive complaints about the Project and facilitate their resolution, in a prompt,	after the effective date of the project,	
	efficient, transparent, culturally appropriate and easily accessible manner to all Project-	and then operationalize and maintain it	
		throughout project implementation	
	affected parties, at no cost or retribution, including concerns raised and complaints made anonymously, in accordance with ESS10.		
	The GRM is equipped to receive, register, and facilitate resolution of SEA/SH		
	complaints, referring survivors to relevant GBV service providers, in a safe,		
CADAC	confidential, and survivor-centered manner.		
CAPAC	CITY BUILDING		

	MATERIAL MEASURES AND ACTIONS	TIMELINE/ TIMELINE	<b>RESPONSIBLE ENTITY</b>
RC1	Training on ESSs	Upon effectiveness of the Project.	Training provided by the
	This training will cover the requirements of the World Bank's Environmental	Directly during the recruitment of E&S	Association.
	and Social Framework:	specialists for the PIU and repeated	
	-ESS1: Assessment and Management of Environmental and Social Risks and Impacts	once every year throughout Project	
	-ESS 2: Labor and Working Conditions (and the LMP document)	implementation.	
	-ESS3: Resource Efficiency and Pollution Prevention and Management		
	-ESS 4: Community health and safety		
	-ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement		
	(and RPF)		
	-ESS6: Conservation of biodiversity and sustainable management of living natural		
	resources		
	-ESS 8: Cultural Heritage		
	-ESS10: Stakeholder Engagement and Information Disclosure (and SEP).		
	In addition to the ESSs, the training will also cover Legal Operational Policy OP/BP		
	7.50 "Projects in International Waterways" as it is applicable to the Project.		
	Training will target the following stakeholders:		
	-PIU		
	-Departments involved at the central level		
	-Services at the deconcentrated level		
	-Civil Society Organizations		
	-Women's associations/organizations		
	-Youth associations/organizations		
	-NGOs involved		

	MATERIAL MEASURES AND ACTIONS	TIMELINE/ TIMELINE	<b>RESPONSIBLE ENTITY</b>
RC2	Occupational Health and Safety (OHS) Training:	Prior to the commencement of	PIU
	The PIU, contractors, and works supervisory engineers shall train all workers involved	employment of newly recruited workers	Entrepreneurs (own
	in Project activities, including security personnel, on OHS, first aid equipment,	or activities for existing employers.	budget)
	emergency preparedness and response measures. The training will also cover	Training will be provided every 6	Works supervision
	STI/HIV/AIDS prevention.	months throughout Project	engineers (with own
		implementation.	budget).
	The PIU, contractors and works supervision engineers must also ensure that the		
	workers of their subcontractors or consultants are trained on the same subjects.		
	Training will torget the following statished down		
	Training will target the following stakeholders: -Entrepreneurs		
	-Contractors' workers (including subcontractors)		
	-Community workers		
	-Works supervision engineers		
	-PIU.		
RC3	Training on employment and working conditions	Prior to the commencement of	PIU
	This training will cover the following topics:	employment for newly recruited	Entrepreneurs (own
	-Terms and conditions of employment under national labor law.	workers or activities for existing	budget)
	-LMP and GM for workers.	employees. Training will be provided	Works supervision
	-Workers' Code of Conduct.	every 6 months throughout Project	engineers (with own
	-Rules on child labor and minimum working age.	implementation.	budget).
	-Workers' rights.	-	
	-Worker complaints and SEA/HS/GBV/VCE related complaints.		
	The training will target the following actors:		
	-PIU		
	-Contractors' workers (including subcontractors)		
	-Community workers.		
	-Works supervision engineers.		
	-NGOs working in the social field in the project area.		

	MATERIAL MEASURES AND ACTIONS	TIMELINE/ TIMELINE	<b>RESPONSIBLE ENTITY</b>
RC4	Environmental and Social Management Training	Training on the effective date of the	PIU, consultants/trainers.
	This training will cover the following topics:	Project.	
	-The process of selection and ES classification of subprojects		
	-Modalities for organizing and implementing the ESIA and RAP.		
	-Environmental policies, procedures, and legislation in Togo.		
	-RPF and ESMF and process for monitoring implementation of RAPs and		
	ESIAs/ESMPs and C-ESMPs.		
	The training will target the following actors:		
	-PIU		
	-Ministries involved- Central and deconcentrated technical services involved in the		
	project		
	-		
	-Traditional and religious authorities		
	-Civil Society Organizations		
	-Women's associations/organizations		
	-Youth associations/organizations		
	-NGOs involved		
RC5	Training on the Grievance Mechanism (GRM)	Training on the effective date of the	
	The training will include the following modules:	Project.	PIU.
	-Procedure for recording, processing and resolving complaints.		
	-Documentation and handling of complaints.		
	-Use of the procedure by the various stakeholders.		
	-Complaints related to SEA/SH/GBV/VCE.		
	The training will target the following actors:		
	-PIU		
	-Local grievance committees		
	-Committees for the management of workers' complaints within companies		
	-Central and deconcentrated technical departments involved in the project		
	-NGOs involved in the project.		

	MATERIAL MEASURES AND ACTIONS	TIMELINE/ TIMELINE	<b>RESPONSIBLE ENTITY</b>
RC6	SEA/SH/GBV/VCE risk training	Training on the effective date of the	PIU, consultants/trainers.
	This training will cover the following topics:	Project.	
	-Awareness-raising and SEA/SH/GBV/VCE prevention and mitigation measures.		
	-Handling of SEA/HS/GBV/VCE complaints.		
	The training will target the following actors:		
	-PIU		
	-Central and deconcentrated technical departments involved in the project		
	-SEA/SH/GBV/ECV service providers		