Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 09/30/2024 | Report No: ESRSA03682

I. BASIC INFORMATION

A. Basic Operation Data

Operation ID	Product	Operation Acronym	Approval Fiscal Year
P179138	Investment Project Financing (IPF)	Digital Togo	2025
Operation Name	Togo Digital Acceleration Project		
Country/Region Code	Beneficiary country/countries (borrower, recipient)	Region	Practice Area (Lead)
Togo	Togo	WESTERN AND CENTRAL AFRICA	Digital Development
Borrower(s)	Implementing Agency(ies)	Estimated Appraisal Date	Estimated Board Date
Republic of Togo	Ministry of Digital Economy and Digital Transformation	21-Oct-2024	17-Dec-2024
Estimated Decision Review Date	Total Project Cost		
17-Oct-2024	105,000,000.00		

Proposed Development Objective

Expand access to affordable and climate-resilient broadband connectivity, enhance digital skills and digital entrepreneurship

B. Is the operation being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project Activities

The proposed Togo Digital Acceleration Project is designed under a series of projects (SOP) approach to signal long-term commitment of the World Bank to the digital agenda in Togo in support of strategic priorities of the Government of Togo (GoT), including “Togo 2025 Government Roadmap” and sectoral strategy Digital Togo 2025. The SOP 1 is articulated around three main components focused on digital infrastructure (supply), digital skills and entrepreneurship (demand), and enabling policy environment (cross-cutting analogue foundation), in addition to a project management component. These components seek to (i) expand resilient and affordable broadband infrastructure with a focus on priority social sectors, such as education and health (connecting education and health facilities as well as townhalls); (ii)

boost digital skills and digital entrepreneurship to drive digital adoption and job creation, with a focus on the youth, women and vulnerable groups; (iii) enhance the enabling legal, regulatory, and institutional environment for a vibrant, safe, and inclusive digital economy; and (iv) support project management. A second, overlapping project (SOP2) will build on these foundations to bring impact at scale with a stronger focus on regional integration. Component 1 will aim to expand affordable broadband connectivity by densifying the distribution network (backhaul) as well as extending last-mile connectivity to electrified, but not connected to internet public facilities (education, health, and townhalls) under a technology neutral approach. The ambition of the GoT is to provide all education and health institutions as well as townhalls with affordable, high-quality, and resilient broadband connectivity, connecting 6,849 education institutions with more than 100 students (1,488 under SOP1 and 5,361 under SOP2), and 804 health establishments (253 under SOP1 and 551 under SOP2), and 136 townhalls (all to be connected under SOP1) . The engagement will be national in scope (with the bidding split in six geographic lots covering the entire territory), impacting more than 1.4 million students and nearly 6,000 hospital beds. Under an MFD / PCE approach, the connectivity expansion anchored in a technology neutral approach will leverage catalytic public funds to de-risk the market by financing infrastructure deployment at the backhaul level and thus crowd in private sector investments for the last-mile connectivity. The approach has been developed and refined in consultations with the private sector (conducted jointly by the Ministry of Digital Economy and Digital Transformation [MENTD] and KPMG) in February 2024 and in early October 2024; additional public-private consultations will be conducted prior to the launch of bidding. The project (under SOP2) will aim to include complementary investments to ensure effective use of the provided connectivity in targeted institutions (for example, internal wiring / cabling work and equipping establishments with suitable terminals / setting up computer classrooms, etc.). Component 2 will aim to equip people with in-demand digital skills to drive their employability and participation in the digital economy, while supporting the entrepreneurship ecosystem to create scalable businesses and jobs. The project interventions under this Component will aim to address job creation challenges and operationalize some of the recommendations Togo Jobs Diagnostic (P175453). Subcomponent 2.1 will support establishing a Techno Hub in Lomé, positioning it as a regional innovation and incubation hub, providing an array of trainings (including virtual), networking, mentorship, incubation, acceleration programs for individuals (including microentrepreneurs) and enterprises (at various stages of growth and from the informal sector). The interventions will help create a pipeline of viable Togolese start-ups and businesses poised for expansion, contributing to tackling pervasive informality, while supporting job creation, economic diversification, and productivity growth. Subcomponent 2.2 will support the establishment of a knowledge network across the country to engage various groups of the population in personalized and collaborative learning and networking. The knowledge network will represent long branches of Lomé-based techno hub to equitably spread the benefits of trainings, bootcamps and job support to other regions. Component 3 will finance technical assistance (TA) activities for MENTD and other key project / sectoral stakeholders, such as telecom regulator (ARCEP) and cybersecurity agency (ANCy) to close key legal and regulatory gaps (integrating gender-informed inclusion measures and environmental policy approaches such as green ICT standards), enhance people's trust in digital transactions, and boost digital public services delivery and uptake. This component will include support to the GoT to develop a national strategy on climate smart digital infrastructure that will establish an Extended Producer Responsibility (EPR) program to reduce the digital sector’s carbon and environmental footprint through e-waste collection, dismantling, refurbishing, and recycling. Efficient recycling of e-waste can greatly reduce the demand for virgin raw materials, thus contributing to limit greenhouse gas (GHG) emissions. Component 4 will provide support for the management and implementation of project-associated activities. Project financing under this Component will cover operating and staff costs of the project implementation unit (PIU) to be established under MENTD. The ultimate objective would be for the PIU staff to progressively transfer the knowledge and responsibility for project management to MENTD staff, paving the way for sustainable project management going forward. This Component will also cover

independent audits and learning/training for the project implementation team and key implementation partners as well as community engagement and communications, including a grievance redress mechanism (GRM), project communication, and citizen engagement. The project is fully aligned with a new World Bank Group's (WBG's) Country Partnership Framework (CPF) FY25-29 for Togo (Report No. 185419-TG), which identifies digital technology as a critical cross-cutting enabler for achieving its high-level objectives (HLOs). Project Components 1 and 2 will contribute to HLO2 (improving human capital), specifically addressing Objective 4 (improving the quality of education and health services), by (i) connecting health and education facilities to internet; (ii) helping people, particularly the youth, women, and PWD, access educational content and develop digital and other skills in line with labor market needs; and (iii) exploring opportunities to strengthen Togo's digital and start-up ecosystem. Furthermore, Component 1 will support HLO3 (promoting inclusive and sustainable territorial development), namely Objective 6 (increasing access to climate resilient infrastructure and services), by expanding affordable and climate-resilient broadband connectivity, while leveraging private capital. This will enhance digital inclusion in underserved and remote areas and strengthen community resilience to climate change by providing reliable access to information and services (Objective 7). Finally, the project interventions under Component 2 seeking to boost digital skills and entrepreneurship will underpin quality employment growth in the private sector (HLO1).

D. Environmental and Social Overview

D.1 Overview of Environmental and Social Project Settings

The Togo Digital Acceleration Project (P179138) is a national project aimed at expanding broadband connectivity and enhancing digital skills across Togo. The infrastructure component of the proposed project (Component 1) will be implemented in selected, yet to be determined, regions, which will most likely include a mix of rural, peri-urban, and urban locations. The environmental and social (E&S) context may differ among sub-projects and activities, as well as specific project locations, which may be plains, plateaus, mountains, or forests. Along major roads used for fiber deployment, there are at least two protected areas: Fazao-Malfakassa and Oti-Keran National Parks. There could be a risk of illegal poaching or fishing if workers must work near the parks, but this could be managed by foresters who are always present to monitor activities around and inside the parks. The project-supported technical assistance activities on the legal, regulatory, and institutional framework will result in nationwide impacts targeting telecom market development, improved digital public services delivery, and enhanced public trust in digital transactions. Togo has benefited from stable economic growth over the last decade, except for the global pandemic hiatus. Togo also has abundant natural resources. However, inequality and poverty continue to prevail, particularly in rural areas. Extreme poverty is estimated at 21.4% in 2022. The COVID-19 pandemic severely impacted the service sector, leading to job and income losses. In response to the health crisis, the Government of Togo adjusted the National Development Plan and adopted a medium-term development strategy: Togo 2025 Roadmap. This strategy includes access for all citizens to high-speed internet, technological equipment, and digitization of public and social services to bring them closer to users. Household broadband penetration, at 4.4% in 2022, and mobile broadband coverage, at 35.7% in 2022, lag compared to other countries in the region. Ownership of digital devices and internet use is critically low among women compared to men, particularly in rural areas. Affordability, digital skills, safety, and security are some of the key barriers women face in accessing the internet and using digital devices. Overcoming such barriers is challenging for women given that only 55.1% aged 15 and above are literate in Togo, and female labor market participation stagnates at 55%, which all limit women's financial autonomy and acquisition of digital literacy. Enhancing Togo's resilience to climate change, including by leveraging digital technologies, will be critical given the country's high vulnerability to disaster risks. Togo ranks 129th in vulnerability and 127th in readiness out of 181 countries in the 2020 Notre Dame Global Adaptation Initiative index, indicating both its high exposure to climate change and its low readiness to face it. Climate-related

disasters, particularly floods, could damage and increase pressures on infrastructure, including broadband connectivity, data infrastructure, and public services. Thus, investments in climate-smart digital infrastructure and transition toward economy-wide digitalization could be one of the key drivers of improved resilience and adaptation. This includes reduced vulnerability and a greater ability to respond to shocks through enhanced and uninterrupted digital access to basic services and public assistance in times of emergencies. Mitigation will also be strengthened as digital communications and processes can help lower greenhouse gas emissions, including reducing the need to travel to provide or access services, work, and engage in commercial and social transactions. These climate adaptation and mitigation considerations and activities will be integrated into project design. The project area in northern Togo is potentially subject to security threats, which may negatively affect monitoring and supervision of works and overall E&S performance. Working in these areas may generate some environmental, social, and security risks and negative effects, which will be screened, documented, and mitigated once sites are known. The project is expected to generate low to substantial environmental and social risks and impacts. The Borrower has prepared, disclosed, and implemented relevant environmental and social safeguards documents, including an Environmental and Social Management Framework (ESMF), a Resettlement Framework (RF), a Labor Management Plan (LMP), and a Security Management Plan (SMP) to mitigate these risks and ensure the project's sustainability.

D.2 Overview of Borrower's Institutional Capacity for Managing Environmental and Social Risks and Impacts

The proposed project will be implemented by a Project Implementation Unit (PIU), which will be established within the Ministry of the Digital Economy and Digital Transformation (Ministère de l'Economie Numérique et de la Transformation Digitale, MENTD). MENTD has experience with World Bank operational policies and has implemented, with overall satisfactory E&S performance, the Togo portion of the World Bank-funded West Africa Regional Communications Infrastructure Program - APL2 (P123093). Currently, it is implementing under ESF the Togo portion of the World Bank-funded West Africa Unique Identification for Regional Integration and Inclusion (WURI) Program (P169594), which has a substantial E&S risk and a moderately satisfactory E&S performance.

The E&S aspects of the proposed project were handled during the preparation phase by WURI's Social Development Specialist with the support of the Environmental Specialist from the Safety Net and Basic Services Project (P157038). The implementing agency's capacity to comply with ESF was assessed by the World Bank team and it will further be strengthened as needed to ensure activities are implemented in line with the World Bank's ESS requirements during project implementation.

The PIU will hire an environmental specialist and a social specialist, who will also address Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) and stakeholder engagement aspects. These specialists will provide high-level support to relevant agencies, including the Regulatory Authority for Electronic Communications and Posts (Autorité de Régulation des Communications Electroniques et des Postes, ARCEP). The PIU will be responsible for managing the E&S risks and impacts of the project. The Bank will ensure that the PIU is provided with adequate capacity building to conduct E&S risk assessments and manage the project in line with ESF requirements.

The project is likely to generate moderate environmental and social risks and impacts on project beneficiaries, government officials, the public, workers, targeted communities, and vegetation. Occupational health and safety risks are expected to result from digital infrastructure construction and operation. Health and safety-related risks include the general risk of labor-related accidents, fire from the presence of flammable materials, as well as motor vehicle safety hazards and traffic management. Community health and safety risks related to dust, noise, construction waste, traffic

accidents, and SEA/SH are also anticipated. Security risks are significant in the northern part of the country, including threats stemming from the jihadist insurgency in the central Sahel.

At this stage, the exact locations of the digital infrastructure expansion, namely small and larger-scale civil works, are not yet known.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Moderate

A.1 Environmental Risk Rating

Moderate

The proposed project as a moderate risk operation, since it does not include activities associated with potentially significant or irreversible negative environmental risks and impacts. Key environmental risks will be related to implementation of sub-component 1.2, which is designed to finance the expansion of the affordable and resilient last mile connectivity in selected areas (focusing on connecting households and public facilities including municipalities, health and educational establishments), and sub-component 2.1, which will scale up a Techno Park by equipping appropriate physical facilities for acceleration and incubation services, trainings and workspaces. These risks are related to : (i) disruption of traffic flow and increased traffic safety risks during the construction and/or rehabilitation phase; (ii) disposal and management of excavated material generated from construction activities; (iii) occupational health and safety of workers both during the construction/rehabilitation and operational phases; (iv) destruction of vegetations; (v) water pollution by the waste; (vi) increased level of dust, noise and vibration from moving of construction vehicles and machinery; (vii) accidents at work and traffic, (viii) land conflicts, (ix) sexual exploitation, and abuse/sexual harassment (SEA/SH), and (x) -community health and safety risk. Connecting households and working spaces will facilitate an increase of electronic devices use and thus lead to e-waste that will endangers environment and people health if they are not disposed of properly. Fortunately, the project will be supporting the development of a national strategy on climate smart digital infrastructure that will establish an Extended Producer Responsibility (EPR) program to reduce the digital sector’s carbon and environmental footprint through e-waste collection, dismantling, refurbishing, and recycling. Efficient recycling of e-waste can greatly reduce the demand for virgin raw materials, thus contributing to limit GHG emissions.

A.2 Social Risk Rating

Moderate

The social risks of the project are assessed as Moderate at the appraisal stage. The project aims to expand broadband infrastructure in regions yet to be identified, benefiting households, enterprises, and public facilities, particularly in the health and education sectors. The scope of the digital infrastructure expansion will be defined by technical and feasibility studies, but it will likely involve constructing telecom base stations and reinforcing electric poles while deploying fiber. Component 1, which includes expanding digital connectivity, may result in small-scale land acquisitions, temporary displacement, restricted access to businesses, and disruption of economic activities. Component 2, focusing on enhancing digital skills and fostering innovation, will require physical spaces equipped with ICT infrastructure, developed on government-owned land. The project's geographic areas are still to be determined, but they include Northern Togo, where the presence of the military might be necessary, adding a security risk. During

preparation, this risk, along with the potential exclusion of marginalized groups—such as women, people living in poverty, and persons with disabilities—will be further evaluated. Elite capture, the risk of these groups being excluded from project benefits, is also identified as a concern. Additional social risks during the construction phase include traffic disruptions, increased safety hazards, and the disposal of construction waste. Occupational health and safety for workers, especially during construction and operation, is critical. Environmental concerns, such as vegetation destruction and water pollution from waste, have social implications. Communities might also experience increased dust, noise, and vibrations from construction vehicles, affecting their well-being. Community health and safety concerns will be addressed, and the project will work to mitigate risks from increased e-waste by supporting a national strategy for climate-smart digital infrastructure. This strategy includes an Extended Producer Responsibility (EPR) program aimed at reducing the environmental impact of the digital sector by promoting e-waste recycling, refurbishment, and collection. Proper e-waste management will help reduce greenhouse gas emissions by limiting the need for raw materials. Security risks are particularly significant in Northern Togo, where there are concerns related to the jihadist insurgency in the central Sahel. While the exact locations for digital infrastructure expansion are still unknown, these risks will be addressed during project implementation. Despite these risks, the social risk rating remains Moderate due to the manageable nature of the identified risks and the mitigation measures that can be applied. The project is not expected to involve activities that would cause significant or irreversible negative social impacts. Risks related to land acquisition, displacement, and access restrictions are considered small-scale and manageable with proper planning under the Resettlement Policy Framework. The potential for elite capture and exclusion of marginalized groups will be tackled through inclusive engagement strategies. Security risks in Northern Togo will be managed with appropriate measures. Furthermore, the project's emphasis on a national strategy for climate-smart digital infrastructure, along with the establishment of the EPR program, will contribute to reducing environmental and social risks.

B. Environment and Social Standards (ESS) that Apply to the Activities Being Considered

B.1 Relevance of Environmental and Social Standards

ESS1 - Assessment and Management of Environmental and Social Risks and Impacts — Relevant

The project is likely to generate moderate environmental and social risks and impacts on project beneficiaries, government officials, the public, workers, targeted communities, and vegetation. Occupational health and safety risks are expected to result from digital infrastructure construction/rehabilitation and operation. Health and safety-related risks identified so far at the concept stage include the general risk of labor-related accidents, fire from the presence of flammable materials, as well as motor vehicle safety hazards, and traffic management. Construction works along the protected areas may disturb natural habitats and be a threat to the existing biodiversity. Community health and safety may be exposed to risks related to dust, noise, construction waste, traffic accidents, and SEA/SH. Security risks are significant in the northern part of the country, including threats stemming from the terrorism insurgency in the central Sahel. At this stage, the exact locations of the digital infrastructure expansion, namely small and larger-scale civil works, are not yet known. The relevant environmental and social instruments to be prepared have been incorporated into the Environmental and Social Commitment Plan (ESCP) to be agreed with the Client as a requirement of the legal agreement that will ensure project compliance with the Environment and Social Standards and the World Bank Group (WBG) Environmental, Health and Safety (EHS) Guidelines. The Borrower prepared and consulted an Environmental and Social Management Framework (ESMF) to guide the preparation of Environmental

and Social Impact Assessments / Environmental and Social Management Plans for the subprojects. This ESMF which assesses potential SEA/SH risks and advises on mitigation actions to be enforced will be disclosed, and implemented throughout the project life. The ESMF set out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts, including: guidance to manage climate change, and measures for emergency response, biodiversity, gender, disabilities and other vulnerable persons/groups, and the adoption of a code of conduct for the protection of project workers and the communities/users bordering the construction sites, etc. The ESMF provides guidance on screening for potential risks and on managing unavoidable environmental and social impacts. It gives guidance on the level of environmental and social assessment and types of instruments needed. The ESMF incorporates both the general and sector-specific Environmental Health and Safety Guidelines (EHSGs) for activities identified in relation to occupational and community health and safety. The ESIA/ESMPs will clearly define mitigation measures for construction and operational phases, roles and responsibilities, costs and implementation arrangements for each recommended mitigation measure. Contractors will be required, as a condition of their contract with the Project, to prepare and implement their Contractor-ESMP, based on environmental and social clauses that will be included in the bidding documents. A Resettlement Policy Framework has been prepared to provide guidance for the screening and management of any unavoidable involuntary physical or economic displacement.. The Environment and Social Commitment Plan (ESCP) outlines the timelines and responsibilities for preparing, updating and implementing any ESIAs, ESMPs, SEP, LMPs, RF/RPs as necessary throughout the life cycle of the project. When the locations in the unsafe areas connectivity activities will be confirmed, more assessment will be developed on security risks as well as their impacts on those activities and appropriate measures for their management will be proposed. Meanwhile a security management plan has been developed, reviewed and approved by the World Bank.

ESS10 - Stakeholder Engagement and Information Disclosure Relevant

This standard is relevant because the project involves stakeholders with diverse interests and levels of influence on project activities, including young girls and women and parties dwelling in peri-urban or rural areas. The different interests, priorities, and concerns of stakeholders need to be considered in the design of inclusive and participatory engagement strategies, tailored to the different groups' needs and contexts. Initial identification of key project stakeholders includes: (i) Government Agencies: MENTD as the lead government agency, as well as other relevant ministries and agencies; (ii) local authorities, including municipalities; (iii) the private sector; (iv) consumer associations or organizations; (v) civil society; and (vi) local urban and rural communities. The private sector is relevant in this project because of potential public-private partnerships (PPPs) for activities, such as infrastructure expansion. Inclusive participation and consultation methodologies will be tailored to the context, needs, and interests of different stakeholders. Such methodologies will prioritize relevant approaches for women, girls, and communities dwelling in rural and peri-urban areas. The project will conduct consultations with civil society stakeholders, including non-governmental and civil society organizations (CSOs) and other relevant parties on how to improve access to project benefits for non-urban communities and women and girls. Such consultations will inform the project design. The project Stakeholder Engagement Plan (SEP) was prepared by the Borrower. The SEP includes the details and operationalization of a comprehensive project-wide Grievance Mechanism (GM), including a procedure to address any SEA/SH-related grievances. The SEP is designed to be updated throughout implementation to better adapt to the endorsed inclusiveness and expected wide coverage project results. The project will also incorporate transparency and feedback mechanisms while developing activities aimed at broad citizen engagement (CE) in the digital economy. This will include periodic (e.g., semi-annual) and collaborative workshops, focus group consultations, public

information events reporting project results, and participatory community M&E efforts. The collective feedback will then be captured in a feedback summary report, which will be an integral part of the project implementation status and result reports (along with the financial and procurement reports) to be submitted by the PIU, reflecting progress toward project outcomes. Additionally, the project will address specific vulnerabilities and obstacles to accessing information or other project benefits. For example, women and households headed by women, as well as poor and vulnerable individuals, may face challenges such as low levels of education, limited access to digital devices, and financial barriers to digital services. The project will engage with representative organizations and leaders, such as women's groups and CSOs, to ensure these groups are adequately consulted and their needs are addressed. Methods of engagement will include separate consultations with women and girls, digital literacy education, and culturally appropriate communication strategies in local languages. The SEP also identified specific methods to engage vulnerable groups and overcome obstacles to accessing project information and benefits. For instance, the project used traditional notifications through women's groups, culturally adapted image boxes for digital education, and public announcements. Meetings and workshops were conducted in both French and local languages, and information was shared through social media and public notices. Additionally, the project utilized radio programs in local languages to disseminate information effectively.

ESS2 - Labor and Working Conditions Relevant

ESS2 is relevant at the appraisal stage. The project is likely to engage various types of workers, including direct project workers (PIU consultants), contractor workers, and primary supply workers. The PIU will be supported by consultants, and civil and public servants at various implementing agencies at the national and sub-national levels. Given the nature of the activities, a large-scale labor influx is not expected. The project may require the recruitment of small-scale technical non-local expertise for works in rural areas; however, local recruitment will be prioritized for non-specialized labor. In line with ESS2 and national legislation, the use of forced labor or hazardous child labor under the age of 18 will be prohibited. The installment of IT equipment can pose risks related to infrastructure works, for instance, labor accidents due to mishandling of machinery or inappropriate placement of material, debris, and mud. To address these risks and ensure the health and safety of workers, the project will require IT equipment installation contractors to include in their bids and contracts adequate provisions to identify and address occupational health and safety risks of the proposed subproject and ensure general compliance with World Bank guidance and Togo government protocols. If relevant, the project may require contractors to prepare site-specific Occupational Health and Safety Plans in line with World Bank Group Environment, Health, and Safety (EHS) Guidelines. Such plans would include incident investigation and reporting, emergency preparedness and response procedures, and continuous training and awareness to workers.bThe Labor Management Plan (LMP) was prepared by the Borrower. The LMP is proportional to the activities, risks, and impacts identified, and provides detailed information on the work terms and conditions, including the explicit prohibition of forced and hazardous forms of child labor. The LMP includes specific provisions for each of the different categories of works under the project, such as PIU consultants, contractors' workers, primary suppliers' workers, and civil servants, in accordance with ESS2 and national legislation. The LMP includes standards' provisions to be incorporated in the Code of Conduct related to SEA/SH, child and forced labor, and occupational health and safety. Finally, the LMP establishes requirements for setting up labor-specific Grievance Mechanisms (GMs) accessible to different types of workers involved in the project, throughout the project's lifecycle, including a procedure to address SEA/SH complaints in the workplace or related to work contracts. The project will also ensure compliance with national and international labor standards, including those set by the International Labour Organization (ILO). Measures will be taken to ensure the health and safety of workers, including the provision

of appropriate personal protective equipment (PPE), regular health and safety training, and the establishment of safe working conditions on-site. The project will adhere to the national legislation on occupational health and safety (OHS) and the World Bank Group's EHS Guidelines, which include provisions for incident investigation, emergency preparedness, and response procedures. Furthermore, the project will address specific labor conditions such as the provision of adequate sanitary facilities, rest areas, and medical surveillance for workers engaged in tasks with particular risks. The project will ensure that all workers have access to medical care and are covered by health insurance. The LMP will also include provisions for fair treatment, non-discrimination, and equal opportunity for all workers, ensuring that employment decisions are based on merit and not influenced by gender, ethnicity, or other discriminatory factors. The project will also incorporate measures to ensure that the working conditions are in line with the national labor code and international best practices. This includes ensuring that workers have access to grievance mechanisms to report any issues related to their employment conditions, health, and safety. The grievance mechanisms will be designed to be easily accessible and confidential, ensuring that workers can report issues without fear of retaliation. The Borrower has disclosed the LMP prior to Board Approval.

ESS3 - Resource Efficiency and Pollution Prevention and Management Relevant

This standard is relevant. This standard is relevant. The proposed construction activities will involve Resource Efficiency and Pollution Prevention and Management. Civil works will involve excavation, dust, noise, waste (wood, iron, plastic, packaging and organic waste from the destruction of vegetation) and water consumption. Air emissions: During the construction/deployment phase, air emissions will mainly be composed of dust and exhaust from heavy vehicles and machinery. Those most likely to be affected are people living within the proximity of the construction sites. The implementation of mitigation measures such as dust suppression and vehicle maintenance will be applied to minimize the impact of air emissions during construction and deployment and residual impacts are expected to be limited in scope and duration. Noise: During the construction/rehabilitation phase, noise might likely be generated from the use of construction machinery and vehicle movements. The relatively short-term and small-scale nature of the works suggest that noise levels will be negligible. The construction works will present short-term nuisance to the public and to owners adjacent to some of the project sites. The ESMP of the ESIAs to be prepared overtime by the borrower will include mitigation measures to minimize and manage the noise levels, including by applying standard restrictions to hours of site work. Waste management: Construction and rehabilitation activities will generate solid waste which will primarily include excavated soil, wood, cement, and hazardous waste, such as hydrocarbon oils from construction machinery and vehicles. The waste generated by the construction works whose quantity is not anticipated to be important will be disposed at sites previously identified by the ESIA, for which mitigation measures have been prepared. Installing selective bins on each site to collect waste or signing an agreement with a waste collection company are other mitigation measures. To better manage electronic waste derived from increased use of devices, the project will be supporting the development of a national strategy on climate smart digital infrastructure that will establish an Extended Producer Responsibility (EPR) program to reduce the digital sector’s carbon and environmental footprint through e-waste collection, dismantling, refurbishing, and recycling. Efficient recycling of e-waste can greatly reduce the demand for virgin raw materials, thus contributing to limit GHG emissions. Water balance: The construction/deployment activities will mostly use surface water. That means where there are other users, such as breeders, fishermen and wildlife, special attention may be paid to avoid any adverse impact on the other uses of water. Although, the consumption impact on the surface water seems to be negligible, the disturbance of hydrology and water resources during dry season needs a mitigation measure to be included in the ESIA/ESMP. Those different mitigation measures will be integrated in bidding documents to avoid/reduce these nuisances.

ESS4 - Community Health and Safety Relevant

This standard is relevant because project activities will involve the rehabilitation or construction of digital infrastructure required for FTTH connectivity in selected areas, which will most likely include a mix of urban, peri-urban, and rural settings. Key issues identified include traffic and road safety, exposure to dust, noise, waste, pollution, and vibration caused by construction works. An ESMF has been prepared and assessed community health and safety risks and proposed appropriate mitigation measures. Site-specific ESIAs and ESMPs will propose mitigation measures to address community health and safety issues, as well as Occupational Health and Safety issues. There may also be a potential risk for SEA/SH for women, girls, and boys, particularly in rural areas, in target schools as well as in health centers. Mitigation of these risks will be guided by the implementation of the project SEA/SH Action Plan. The use of armed or military force is still to be determined, as the construction of digital infrastructure and/or expanding digital connectivity may require reinforced security in northern Togo. Private/ public security personnel will be used to guard project sites and assets. The Contractor ESMP will assess Security Personnel requirements and implement measures to manage the security risk of the project as needed, in relation to hiring, rules of conduct with the communities, including women, and with other workers, training, equipping, and monitoring of such personnel before involvement of such personnel. A Security Management Plan (SMP) of the project has been developed to guide the security management during the project implementation in the northern region of Togo.

ESS5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement Relevant

ESS5 is relevant at the appraisal stage because the installation or improvement of digital infrastructure may lead to involuntary resettlement impacts. The scope and nature of the digital infrastructure will be partly defined by project-supported technical and feasibility studies that will provide data on the demand and supply side, among others. The deployment of a fiber optic cable will need civil works that will prioritize, as much as possible, the existing infrastructure of non-telecom utilities, especially electric poles. Where required, the project will also finance the physical upgrade of electric poles to sustain the fiber deployment or construct new poles if electric poles are deemed technically unsuitable. Such investments are expected to generate low to moderate involuntary resettlement impacts. Under Component 2, which focuses on digital skills and innovation, classes or spaces appropriate for interaction as well as ICT equipment will be needed to deliver activities such as training, networking, mentorship, incubation, and acceleration programs. State-owned land is available to carry out these activities. Therefore, Component 2 activities will prioritize the rehabilitation of existing buildings. The specific location, number, and scope of civil works are currently undetermined. As the project's footprint will depend on the connectivity solutions chosen, which is unknown at this stage, the Borrower has already prepared a Resettlement Policy Framework (RPF) in consultation with relevant stakeholders and disclosed it prior to Board Approval. The RPF provides guidance on the process for preparing, reviewing, approving, and implementing subsequent Resettlement Action Plans (RAPs), where necessary, and prior to the commencement of any civil works. The RPF also provides guidance on the process required for public consultations, the establishment of a functional Grievance Mechanism (GM) tied into the project-level GM, and disclosure requirements. The nature of the project-supported investments and the prioritization of rehabilitation of existing infrastructure indicate that the involuntary resettlement impact is moderate. The RPF also includes provisions for livelihood restoration plans, capacity building for stakeholders on resettlement procedures, and the implementation of the Resettlement Plans. The costs associated with these activities, including public awareness and consultation, monitoring and evaluation, and the final audit of the implementation of the Resettlement Plan, are included in the overall budget for the project. The Togolese government will finance the costs of land acquisition and compensation for losses, while the World Bank will contribute to the implementation of the

RAPs, capacity building, monitoring and evaluation, and resettlement assistance, including measures for vulnerable groups. The Borrower will ensure that all resettlement activities are carried out in compliance with both national legislation and the World Bank's ESS5 standards, thereby promoting sustainable development and social equity.

ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources — Relevant

This standard is considered relevant. This will ensure that all precautions are taken to protect biodiversity, as some activities could involve the primary production and/or harvesting of living natural resources. The main activity that could affect biodiversity conservation is the fiber deployment knowing that along the major roads that are normally used for fiber deployment, there are at least two Protected Areas: Fazao-Malfakassa and Oti-Keran National Parks where there could be a risk of illegal poaching or fishing if workers must work near the parks. Based on that, necessary measures were captured in the project's ESMF (and will be developed in the potential ESIA/ESMP) to prevent or mitigate the possible impacts and, where needed, biodiversity management plans will be prepared and implemented. The ESMF provides guidance on screening and mitigation measures to ensure that project activities do not alter or cause the destruction of any critical or sensitive natural habitats

ESS7 - Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities — Not Currently Relevant

This standard is not considered relevant as there are no Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities currently identified in the project area. Should the presence of indigenous communities be confirmed through further screening during implementation, the necessary assessments, consultations and instruments will be undertaken per the requirements of this standard.

ESS8 - Cultural Heritage — Relevant

This standard is considered relevant. The Project will finance activities that will involve light earthwork, including low to medium-scale excavation for small building construction/rehabilitation and the extension of connectivity in rural and remote areas. These types of activities may lead to the discovery of unknown cultural heritage or affect cemeteries or burial grounds. The ESMF includes a chapter on cultural heritage to ensure that there are no pre-existing or known cultural heritage sites that could be affected by the project and for protecting cultural values and assets, including engaging local communities and traditional authorities on the management of issues associated with known cultural sites and artifacts. "Chance finds" procedures in the form of clauses will be added to the contracts should there be any contractors required as part of project implementation. Site-specific simplified ESIAs will also include a Chapter on Cultural heritage as well as "hance finds" procedures.

ESS9 - Financial Intermediaries — Not Currently Relevant

This standard is not currently relevant. The Project will not involve financial intermediaries.

B.2 Legal Operational Policies that Apply

OP 7.50 Operations on International Waterways — No

OP 7.60 Operations in Disputed Areas No

B.3 Other Salient Features

Use of Borrower Framework No

The project will not rely on the Borrower's environmental and social Framework but will comply with relevant national legal and regulatory requirements.

Use of Common Approach No

NA

C. Overview of Required Environmental and Social Risk Management Activities

C.1 What Borrower environmental and social analyses, instruments, plans and/or frameworks are planned or required by implementation?

Before Appraisal:
ESCP, ESMF, LMP, SMP, RPF, SEP

Before Effectiveness:
SEA/SH Action Plan

III. CONTACT POINT

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