

MINISTRY OF DIGITAL ECONOMY AND DIGITAL TRANSFORMATION (MENTD)

TOGO DIGITAL ACCELERATION PROJECT P179138

NEGOTIATED VERSION

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

7 November 2024

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	RESPONSIBLE ENTITY		
MONI	MONITORING AND REPORTING				
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.	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.	Implementation Unit (PIU) within MENTD.		
В	INCIDENTS AND ACCIDENTS promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the 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.	Notify the Association of the incident or accident no later than 48 hours after 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.	PIU within MENTD.		

	MATERIAL MEASURES AND ACTIONS	TIMELINE	RESPONSIBLE ENTITY
С	MONTHLY CONTRACTOR REPORTS Require contractors and supervising firms to produce monthly monitoring reports on ESHS performance in accordance with the indicators specified in the respective bidding documents and contracts and submit these reports to the Association.	Submit monthly reports to the Association upon request and as annexes to the reports due under Action A above.	PIU within MENTD Contractors and prime contractors
D	NOTIFICATIONS OF DAAB REVIEW OF CONTRACTOR'S COMPLIANCE WITH SEA/SH-PREVENTION AND RESPONSE OBLIGATIONS Notify the Association of any request submitted to the Dispute Prevention and Resolution Board (DAAB) to initiate a process to review contractors' compliance with obligations to prevent or respond to SEA and/or SH specified in the works contract with said contractors; and if any such request is made, notify the Association: (i) of the DAAB's decision with respect to such request; (ii) the supplier's notice, if any, of 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	applicable).	Finance
1.1	ORGANIZATIONAL STRUCTURE Establish and maintain the PIU responsible for the management of environmental, social, health and safety issues and staffed with qualified staff and adequate resources to support the management of the Project's ESHS risks and impacts, including (i) an environmental specialist and (ii) a social development and gender specialist. Recruit a security consultant as required to be responsible for all aspects of security monitoring and management, including liaison with armed forces, local communities, and security audits at project sites. The terms of reference and qualifications of all applicants shall be subject to the Association's no objection procedure.	The PIU was established in November 2024, as per Decree No. 010/24/MENTD/CAB signed on November 3, 2024. Key personnel, including the environmental specialist and the social development and gender specialist, have been competitively recruited as provided for in the financing agreement.	MENTD.

- Adopt and implement, as necessary, an Environmental and Social Impact Assessment (ESIA) and prepare and implement the corresponding Environmental and Social Management Plan (ESMP) for subprojects/activities that require it, including subprojects under Components 1 and 2 of the Project, in accordance with the relevant ESSs. The ESMP will be followed by specific plans to be prepared by suppliers (C-ESMP, Specific Waste Management and Disposal Plan (PPGED), Environmental Assurance Plan (PAE), Safety and Health Protection Plan (PPSPS)). - Adopt and implement an Environmental and Social Management Framework (ESMF) for the Project, in accordance with the relevant ESSs. - Adopt and implement the following risk assessment and management tools and instruments for the Project, in accordance with the relevant ESSs and the Environmental, Health and Safety Guidelines (ESHS): - Adopt and implement the following risk assessment and management tools and instruments for the Project, in accordance with the relevant ESSs and the Environmental, Health and Safety Guidelines (ESHS): - Adopt and implement an Environmental and Social Management tools and instruments for the Project, in accordance with the relevant ESSs and the Environmental, Health and Safety Guidelines (ESHS): - Adopt and implement an Environmental and Social Management Framework (ESMF); - Adopt and implement the following risk assessment and management tools and instruments for the Project, in accordance with the relevant ESSs. - Adopt and implement an Environmental and Social Management Framework (ESMF); - Agety Guidelines (ESHS): - Adopt and implement an Environmental and Social Management Framework (ESMF); - Agety Guidelines (ESHS): - SEA/SH Prevention and Management Framework (ESMF); - SEA sudits (if required). - Agety Guidelines (ESHS): - Adopt and implement and Environmental and Social Management Framework (ESMF); - SEA/SH Prevention and Management Framework (ESMF); - SEA sudits (if required). - Agety Guidelines (ESHS): - Adopt Andrew Guide	N	ATERIAL MEASURES AND ACTIONS	TIMELINE	RESPONS ENTI	
1.3 CONTRACTOR MANAGEMENT Incorporate relevant aspects of the ESCP, including relevant environmental and social instruments, labor management procedures, and code of conduct, in the ESHS specifications of the bidding documents issued to contractors and project managers. Then, ensure that these contractors and their subcontractors comply with the ESHS specifications of their respective contracts. 1.4. TECHNICAL SUPPORT Ensure that any consultations, studies (including feasibility studies, if any), capacity building,	- Adopt and implem (ESIA) and prepare Management Plan (E under Components 1 will be followed by s Management and Disp Health Protection Pla - Adopt and implement the Project, in accorda - Adopt and implement for the Project, in accorda Safety Guidelines (ES ✓ an Environm ✓ SEA/SH Pre ✓ Safety Manag	ent, as necessary, an Environmental and Social Impact Assessment and implement the corresponding Environmental and Social SMP) for subprojects/activities that require it, including subprojects and 2 of the Project, in accordance with the relevant ESSs. The ESMP pecific plans to be prepared by suppliers (C-ESMP, Specific Waste osal Plan (PPGED), Environmental Assurance Plan (PAE), Safety and a (PPSPS)). In the an Environmental and Social Management Framework (ESMF) for note with the relevant ESSs. It the following risk assessment and management tools and instruments fordance with the relevant ESSs and the Environmental, Health and HS): Ental and Social Management Framework (ESMF); Tention and Management Action Plan ement Plan (SMP);	- Adopt the ESIA and ESMP prior to the start of any activity requiring the preparation of such an instrument, and thereafter implement the ESIA and ESMP, including specific plans throughout Project implementation Adopt the ESMF prior to project appraisal Adopt the SEA/SH prevention and management action plan no later than three (3) months after the effective date of the Project - Adopt the PGS no later than the effective date of the Project. Require environmental compliance certificates on ESIAs and ESMPs before works begin.	PIU MENTD.	within
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 in line with the terms of reference.	1.3 CONTRACTOR MAN Incorporate relevant instruments, labor ma of the bidding docume contractors and their s contracts. 1.4. TECHNICAL SUPPO Ensure that any consu training, and any oth accordance with term ESSs. Subsequently, 6	aspects of the ESCP, including relevant environmental and social nagement procedures, and code of conduct, in the ESHS specifications nts issued to contractors and project managers. Then, ensure that these ubcontractors comply with the ESHS specifications of their respective left. PRT Itations, studies (including feasibility studies, if any), capacity building, er technical assistance activities under the Project are carried out in sof reference acceptable to the Association and consistent with the	When preparing the respective procurement documents. Supervision of contractors throughout Project implementation. Throughout Project implementation.	PIU MENTD. PIU MENTD.	within

	MATERIAL MEASURES AND ACTIONS	TIMELINE	RESPONSIBLE ENTITY
2.1	LABOR MANAGEMENT PROCEDURES Adopt and implement labor management procedures (LMP) established for the Project, including, inter alia, provisions on working conditions, management of the 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.	Adopt LMPs prior to Project Appraisal and thereafter implement LMP throughout Project implementation.	PIU within MENTD.
2.2.	GRIEVANCE MECHANISM FOR PROJECT WORKERS: Establish and operationalize a Grievance Redress Mechanism (GRM) for Project workers, as described in the LMP and in accordance with Togolese labor legislation and ESS2.	Adopt the GRM prior to hiring workers for the Project, and thereafter maintain and operate throughout Project implementation.	PIU within MENTD.
	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT		
3.1	WASTE AND HAZARDOUS MATERIALS MANAGEMENT PLAN Adopt and implement a waste management plan (WMP) to manage hazardous and non-hazardous waste, including e-waste, in accordance with ESS3. Specific measures will also be included in sub-project ESIA reports and ESMPs.	Measures related to waste management/DMP will be incorporated into the ESMF, to be adopted prior to project appraisal, and the ESIAs and ESMP prior to the commencement of works. These waste management measures will be maintained and implemented throughout Project implementation.	PIU within MENTD. Ministry of Environment and Forest Resources (MERF) Agence National de Gestion de l'Environnement (ANGE).
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Integrate resource efficiency (raw materials, energy and water), pollution prevention and management measures in the ESMP to be prepared under action 1.2 above for subprojects/activities	Same timeframe as for the adoption and implementation of the ESMP, and implementation of measures throughout Project implementation.	PIU within MENTD.
	COMMUNITY HEALTH AND SAFETY		
4.1	TRAFFIC AND ROAD SAFETY Include traffic and road safety risk management measures in the ESMP to be developed under action 1.2 above.	Same timeframe as for the adoption and implementation of the ESMP.	PIU within MENTD. Entrepreneurs

	MATERIAL MEASURES AND ACTIONS	TIMELINE	RESPONSIBLE ENTITY
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage the risks and impacts that Project activities may generate on local populations, including risks related to labor influx and migrant workers, GBV/SEA/SH and violence against children (VIE), behavior of Project workers in relation to respect of community customs, security and HIV/AIDS risks, labor influx, emergency response, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.	Prior to the start of construction	PIU within MENTD Entrepreneurs Oversight mission
4.3	GBV/SEA/SH RISKS Adopt and implement a SEA/SH and VAC action plan also referred to in the LMP and the GRM that is appropriate and proportionate to the level of moderate risk in a manner acceptable to the Association. The mitigation plan will be developed or updated in accordance with national provisions, the conventions ratified by Togo and the guidelines of the Good Practice Note on Gender-Based Violence. Ensure that all bidding documents, works contracts, or service contracts of contractors, subcontractors, or consultants include the Codes of Conduct for the project to be given to all project workers for signature.	Not later than six (6) months after the effective date of the project, updated as needed and implemented throughout the project life cycle. Codes of conduct will be signed by all workers at the same time as contracts are signed	PIU within MENTD. Entrepreneurs Health facilities Schools Town halls Ministère de l'Action Sociale, de la Solidarité et de la Promotion de la Femme
4.4	SAFETY MANAGEMENT Assess and implement measures to manage Project security risks, including risks associated with the use of security guards to protect project workers, sites, assets and activities as defined in the Safety Management Plan (SMP), based on the principles of proportionality and good international industry practice (GIIP) as well as the applicable law on the recruitment, rules of conduct, training, equipment, and monitoring of such personnel.	Adopt the PGS before calling in security personnel and thereafter throughout project implementation. The action plan will be updated as necessary, based on changes in the security situation in the sub-project areas.	Entrepreneurs (own budget) Oversight Entities PIU and Ministry of Security and Civil Protection and the relevant security or military unit.

4.5 USE OF THE DEFENCE AND ARMY FORCES

Ensure that the following measures are taken prior to involving the Recipient's Defense and Security Forces in the implementation of Project activities to ensure the safety of Project workers, sites and/or assets, in accordance with the ESSs:

- a. Assess and implement measures to manage the security risks associated with the use of the Defense and Security Forces (FDS) as set out in the Security Management Plan, based on the principles of proportionality, GIIP and applicable law regarding screening, recruitment, rules of conduct, training, equipping and monitoring the Defense and Security Forces.
- b. Adopt and implement standards, protocols and codes of conduct for the selection and employment of Defense and Security Forces under the Project and conduct background checks on its personnel to ensure that they have not 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 Defense 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 regarding 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 Defense and Security Forces in the Project.
- f. Ensure that all concerns or complaints regarding the conduct of the Defense and Security Forces are received, investigated and recorded (considering 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.
- 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 and discussed with the Association, as may be requested by the Association following review of the reports of the monitoring consultant.

Complete points (a), (b), (c), and (d) before deploying defense and security forces under the project and ensure implementation throughout project implementation.

For items (e) and (f) as outlined in actions 10.1 and 10.2 respectively. Notify the Association after learning of the concern or grievance within the timeframe specified in action B above.

For (g) within the timeframe requested by the Association. PIU Ministry of Defense

	MATERIAL MEASURES AND ACTIONS	TIMELINE	RESPONSIBLE ENTITY
ESS 5	LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTI	 EMENT	ENIIII
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 consider 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 considered in the RPF, in a manner satisfactory to the Association. RESETTLEMENT PLANS	Adopt and disclose the RPF prior to Project appraisal and be implemented throughout Project implementation. Adopt and implement the respective	PIU Ministry of Economy and Finance EXECUTIVE COMMITTEE
J.2	Adopt and implement a Resettlement Plan (RP) for each Project activity for which the resettlement framework requires such action plan, in accordance with ESS5.	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.	Ministère de l'Economie et des Finances, EXECUTIVE COMMITTEE
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 considers 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 of the RP and thereafter throughout Project implementation.	PIU EXECUTIVE COMMITTEE NGO
ESS 6:	BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NA		
6.1	BIODIVERSITY RISKS AND IMPACTS Adopt 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 the project ESMF and site-specific ESIAs, and thereafter implementation of these measures throughout project implementation.	PIU Contractors/Subc ontractors Supervision of engineers
ESS7: 1	NDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED T	TRADITIONAL LOCAL COMMUNITIES	
	Non applicable		
	CULTURAL HERITAGE		DILL
8.1	RISKS AND IMPACTS ON CULTURAL HERITAGE Introduce and implement measures for the management of cultural heritage (which may be affected by the Project, if applicable), in the Project ESMF and in accordance with ESS8.	Same timeframe as the ESMF and before works commence, and thereafter implement these measures throughout the project.	PIU MENTD.
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8.2 CHANCE FINDS Describe and implement the "chance find" procedures as outlined in the ESMF. Similarl any ESIA to be prepared will include such a section on cultural heritage.	environmental and social management framework and site-specific ESIA,	PIU Contractors/Subc ontractors
	followed by implementation of procedures throughout project implementation.	
ESS9		
Non applicable		
ESS10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		
10.1 PREPARATION AND IMPLEMENTATION OF STAKEHOLDER ENGAGEMENT PLAN AND INFORMATION DISCLOSURE Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, in accordance with ESS10, which includes measures to provide stakeholders with timely, relevant understandable and accessible information, and to consult with them in a cultural appropriate manner, without manipulation, interference, coercion, discrimination and intimidation.	and thereafter implement throughout project implementation	PIU
10.2 PROJECT GRIEVANCE MECHANISM (GM) Establish, disclose, maintain and operate an accessible GRM, to hear concerns and receive complaints about the Project and facilitate their resolution, in a prompt, efficient, transparent culturally appropriate and easily accessible manner to all Project-affected parties, at no coor 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 complaint referring survivors to relevant GBV service providers, in a safe, confidential, and survivor centered manner. CAPACITY BUILDING	then operationalize and maintain it throughout project implementation	PIU

	MATERIAL MEASURES AND ACTIONS	TIMELINE	RESPONSIBLE ENTITY
RC1	Training on ESSs This training will cover the requirements of the World Bank's Environmental and Social Framework: -ESS1: Assessment and Management of Environmental and Social Risks and Impacts -ESS 2: Labor and Working Conditions (and the LMP document) -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	Upon effectiveness of the Project. Directly during the recruitment of E&S specialists for the PIU and repeated once every year throughout Project implementation.	Training provided by the Association.
RC2	Occupational Health and Safety (OHS) Training: The PIU, contractors, and works supervisory engineers shall train all workers involved in Project activities, including security personnel, on OHS, first aid equipment, emergency preparedness and response measures. The training will also cover STI/HIV/AIDS prevention. 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 target the following stakeholders: -Entrepreneurs -Contractors' workers (including subcontractors) -Community workers -Works supervision engineers -PIU.	Prior to the commencement of employment of newly recruited workers or activities for existing employers. Training will be provided every 6 months throughout Project implementation.	PIU Entrepreneurs (own budget) Works supervision engineers (with own budget).

	MATERIAL MEASURES AND ACTIONS	TIMELINE	RESPONSIBLE ENTITY
RC3	Training on employment and working conditions This training will cover the following topics: -Terms and conditions of employment under national labor lawLMP and GM for workersWorkers' Code of ConductRules on child labor and minimum working ageWorkers' rightsWorker complaints and SEA/HS/GBV/VCE related complaints. The training will target the following actors: -PIU -Contractors' workers (including subcontractors) -Community workers.	Prior to the commencement of employment for newly recruited workers or activities for existing employees. Training will be provided every 6 months throughout Project implementation.	PIU Entrepreneurs (own budget)
RC4	-NGOs working in the social field in the project area. Environmental and Social Management Training This training will cover the following topics: -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	Training on the effective date of the Project.	PIU, consultants, trainers.

	MATERIAL MEASURES AND ACTIONS	TIMELINE	RESPONSIBLE
D.C.F	T ' ' (CDM)		ENTITY
RC5	Training on the Grievance Mechanism (GRM)	Training on the effective date of the	PIU.
	The training will include the following modules:	Project.	
	-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.		
RC6	SEA/SH/GBV/VCE risk training	Training on the effective date of the	PIU, consultants,
	This training will cover the following topics:	Project.	trainers.
	-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		