

INTEGRATED SAFEGUARDS DATA SHEET

APPRAISAL STAGE

Report No.: ISDSA1061

Date ISDS Prepared/Updated: 24-Nov-2014

Date ISDS Approved/Disclosed: 03-Dec-2014

I. BASIC INFORMATION

1. Basic Project Data

Country:	Togo	Project ID:	P149277
Project Name:	Togo: Mining Governance and Development Project Preparation - Phase I (P149277)		
Task Team Leader:	Brigitte Marie Khadidja B		
Estimated Appraisal Date:	08-Dec-2014	Estimated Board Date:	26-Feb-2015
Managing Unit:	GEEDR	Lending Instrument:	Investment Project Financing
Sector(s):	Other Mining and Extractive Industries (100%)		
Theme(s):	Other environment and natural resources management (40%), Managing for development results (35%), Other public sector governance (20 %), Export development and competitiveness (5%)		
Is this project processed under OP 8.50 (Emergency Recovery) or OP 8.00 (Rapid Response to Crises and Emergencies)?			No
Financing (In USD Million)			
Total Project Cost:	15.00	Total Bank Financing:	15.00
Financing Gap:	0.00		
Financing Source			Amount
BORROWER/RECIPIENT			0.00
International Development Association (IDA)			15.00
Total			15.00
Environmental Category:	B - Partial Assessment		
Is this a Repeater project?	Yes		

2. Project Development Objective(s)

To strengthen the capacity of key institutions to manage the minerals sector, improve the conditions for increased investments in and revenues from mining, and facilitate an effective and efficient spending of mining revenues.

The specific development objectives and activities of a possible second project would be defined on the basis of the experiences and lessons learned from the implementation of this Project.

3. Project Description

The Project's design is well informed by prior policy dialogue and several analytical studies as well as preparatory work completed by the Government, independently and with Bank support. The proposed project is consistent with the overall objective of developing the mining sector in a context of transparency and good governance. The implementation of the project will contribute ultimately to a major overhaul of the mining sector in its quest to be one of the main pillars on which the government intends to use to achieve the objectives of boosting growth on a sustainable basis.

Project phasing is expected to encompass the following broad principles: (i) implementation in the first 18 months of the Project of activities for which ToR and Technical Specifications have largely been completed during Project preparation, such as Mining Cadastre, GIS and PIC components, the setting-up of a Mineral Production Monitoring and Oversight Committee, ASM support, transaction advisory services for mining, SESA and others as mentioned; (ii) implementation at mid-term of the cross-sectoral components and follow-up activities, such as follow-up to Mineral Sector Master Plan (which is expected to be completed in 2017); and (iii) implementation of activities such as transaction advisory services and technical support for Government agencies and departments early in the Project and continuing throughout the Project under retainer contracts with firms (time-based contracts for the duration of the Project).

The project has four components, each with sub-components. The components are (A) Mining Governance Capacity Building and Reform; (B) EI Sector Institutional Management Capacity Building; (C) Promoting Shared Prosperity and Sustainability; and (D) Project Management and Coordination. The total cost of the project is US\$15M. The project is entirely funded from IDA resources.

Component A: Mining Governance Capacity Building and Reform (total cost US\$3.40 million)

This component is the fundamental barriers to promotion of mining activities in Togo. The objective of this component is to support first set of indebt reforms in Togo's mines and minerals sector to optimize sector revenues and including through the following:

A.1 Mining Cadastre and National Geological Database (US\$1.00 million): Setting-up a modern mining cadaster, cadastral procedures and integrating the mining cadastral database and GIS system including building capacity and modernizing title registry system at the central cadastre office in Lome. The project will assist the Ministry of Mines in establishing a national database (i.e., Geological Information System, GIS) that will allow for storage, management and assessment of the geological information. Actual funding of the geophysical and geological surveys over selected areas as well as the production of thematic geologic and metallogenic maps of Togo will be funded during Phase II or by other donors. It will assist the Ministry of Mines in establishing a national database (i.e., Geological Information System, GIS) that will allow for storage, management and assessment of the geological information of Togo; and in (ii) developing a modern mining cadastre. The two services will be offered as a One-Stop-Shop for the Investor, by the MME.

A.2. Transaction Advisory Services for Large-Scale Mining Operations and Related Infrastructure (US\$700,000): Provision of technical, legal economic and financial advice to the Recipient's representatives, including review of feasibility studies, production plans, for mining and associated

infrastructure development plans, drafting of mining and ancillary infrastructure development agreements.

A.3. Mineral Assets Evaluation and Tendering (US\$400,000): Setting up detailed procedures for mineral assets assessments and tendering procedures including criteria for selecting appropriate targets for tendering.

A.4. Revenue Generation and Management (US\$500,000): Design and implementation of a technical support plan for Ministry of Finance and the Revenue Authority.

A.5. Creation of Public Information Center on Extractives in Togo (US\$800,000): The application of international principles and standards of transparency and accountability would increase the likelihood of the sector contributing to Togo's development. This requires involvement, participation, and a sustained commitment on the part of citizens to obtain and manage information on operations in the sector and their impact. Access to information is a key factor in development. The aim of the present work is to prepare a development plan for the creation of an extractive industries public information center in Togo. The center would be based in Lomé and would encourage interested citizens, companies, and civil society groups to obtain information on the extractive industries, their impact, and best practices. The center could also provide information on EI contracts, mining titles, and include the mining cadaster and would be hosted in the One-Stop-Shop along with the Cadaster and the National Geological Database. The proposed PIC would make available information on the social impact of the industry, including the impact on living environment; and on the development of mining communities and other effects of the mining sector. The center could provide maps of mining areas, socio-economic indicators, mineral reserves, etc. It could provide printed materials, mineral and related sciences, law, CSR and economics books (as well as information on-line (internet, database). The center would constitute an ideal forum for dialogue and training.

The project will fund the feasibility study (development plan) that will include a cost estimate and technical and financial proposals for the actual establishment of the center. The study will also provide a description of the roles and responsibilities of the various parties and the different products and services to be provided, including some user-pay products that will support the sustainability of the center. From an operational standpoint, the types of tools needed for the center will require the definition of terms and conditions that will ensure sound technical, operational, and financial management. As well, the project will provide an estimate of the annual budget needed to ensure the long-term maintenance of the center.

Component B: EI Sector Institutional Management Capacity Building (total cost US\$3.30 million)

This component will address the limited capacity of the current Government's sector management, monitoring its governance performance and enforcement of rules of law. In this regards, the project aims at: (i) carrying on with a re-organization and clear definitions of roles and respective functions of public institutions in charge of the daily management of mining activities (ii) building capacity for contract negotiation and portfolio's management, and (iii) strengthening the Ministry of Mines ability to better coordinate and to monitor SNPT's activities., and (iv) developing human resources in the mining sector through targeted training. Particularly regarding human resources capacity, the project will build on the existing Earth Sciences Faculty at the University of Lomé and aim at improving the course curriculum to strengthen the mine development functions. Also, the project plans to train nationals in environmental monitoring and supervision of mine's activity in order to

strengthen ANGE's capacity in this regard.

The objective of Component B is to support strengthening the capacity of the Recipient's major institutions engaged in development and governance of the mining sector to allow them to execute their mandates in a way that is conducive to investments while ensuring that safeguards and safety standards are met in accordance with international standards, including through the following.

B.1 Capacities Building for Technical Departments of MME (US\$600,000): Under this sub-component, capacity building and technical assistance to key oversight public institutions will be based on a thorough organizational audit financed under the Project Preparation Facility (PPF). Follow-up support will comprise restructuring, revision of administration and communication procedures; and staffing programs, works, equipment, and training. The program will mainly support the MME and key institutions (DNGM, DNDP, etc.) by providing them with organizational re-engineering (when needed), capacity building, and light infrastructure rehabilitation. This component will also aim at:

- Reinforcing the MME's function of reviewing and reporting on activities by license holders and their compliance with the agreed work plans.
- Enhancing performance of MME's function of managing the State participation in EI developments
- Revising the definition of MME's mandate and functions as stated above and building its capacity to assess and manage the risks associated with its participation in mining concessions in accordance with its mandate.

B.2. Improving MME's Coordination of SNPT's Activities (US\$300,000): Improving the SNPT's capacity to manage the core functions within its mandate, including equipping and building capacity of the operations and office in SNPT's headquarter office in the city of Kpeme and SNPT's mining sites.

B.3.Strengthening SNPT's Capacity to Support Governance Reform (US\$600,000): Assisting SNPT in the formulation and implementation of policy decisions, and in the preparation for investment decisions, to support the Recipient's vision for the development of SNPT's phosphate assets. Updating SNPT's phosphate development policies; and (c) building MME's capacity for assessing and structuring potential PPP arrangements for SNPT's infrastructure development.

B.4. Strengthening Tax Collection Mechanisms (US\$500,000): The current institutional set-up in Togo would require great reinforcement of the government tax administration departments and strengthening of tax collection and revenue collection mechanisms in order to improve institutional governance and revenue management transparency by the State. As other donors are already supporting this link of the EITI++ value chain, the proposed Project will complement them where needed and fill the gaps. Initial activities include linking up with the new Mining Legislation Review technical commission and EITI MSG to gather an inventory of mining sector related taxes and procedures and to complete a modeling of fiscal projections for specific mine and EI sites, including SNPT. A future project could provide additional support to tax collection agencies to address identified main capacity building and resource needs.

B.5. Enhancing Environmental and Social Management of Mining Industries (US\$800,000): The project will support the strengthening of the management of social and environmental issues in the mining sector. To that effect, the proposed project will immediately upon inception, undertake a

Strategic Environmental and Social Assessment (SESA). Next, the project will (a) implement the main recommendations of the SESA for mining and EI sectors; (b) update relevant regulations that affect the sector, including involuntary resettlement, (c) increase Recipient's capacity to manage EIAs and Social Impact Assessments (SIAs) and to address disputes/grievances, and (d) setting up robust monitoring systems for EIAs and SIAs. This sub-component will specifically seek to improve the coordination by ANGE's of mining operations.

The Project would also assess existing environmental liabilities (SESA) resulting from past and current EI activities in Togo, identify the sites most hazardous to human health and safety, and propose monitoring actions as well as possible remediation measures that might be implemented with the support of future projects. This sub-component will also enhance coordination between CSOs/NGOs and the private sector through the implementation of innovative community engagement and social accountability mechanisms.

B.6 Improving Government's Capacity to Manage Artisanal and Small Scale Mining (US\$500,000): As regards management of the artisanal mining sector, the project will undertake formalization of artisanal miners, i.e. Officially recording them and providing them with legal status by making them pay an affordable registration fee to the Central public treasury.

Component C: Promoting Shared Prosperity and Sustainability (total cost US\$2.85 million)

C.1. Human resources development in the mining sector (US\$800,000): Developing human resources in the mining sector through targeted training. Particularly regarding human resources capacity, the project will build on the existing Earth Sciences Faculty at the University of Lomé and aim at improving the course curriculum to strengthen the mine development functions. Also, the project plans to train nationals in environmental monitoring and supervision of mine's activity in order to strengthen ANGE's capacity in this regard.

The project institutional audit will further permit an estimate of available competencies and the skill gap to be filled in the mining sector of Togo. An adequate training program for capacity building to improve governance and management would include state officials as well as those of state companies such as SNPT will be developed and implemented by the project.

C.2 Capacity building for negotiation and portfolio management (US\$200,000): This sub-component will build capacity in contract negotiation and other mining business skills, by providing dedicated training (legal, financial, mining, processing, etc.) to government staff responsible for managing State participation in mining contracts. Complementary assistance could be provided through the Bank's Extractive Industries Technical Advisory Facility (EI-TAF), which was also created to provide rapid-response advisory services and capacity building for extractive industry resource policy frameworks and transactions in developing countries.

C.3. Strengthening Upward and Downward Economic Linkages of Mines Production and Recipient's Cross Sector Platform (US\$700,000): The objective of this sub-component is to support strengthening of the Recipient's capacity in integrating the mining and EI sector into its broader economy, including through the carrying out of studies and provision of transaction advisory services to optimize the economic value derived from development of EI resources by creating an environment in which the industry serves as a springboard for additional economic activities.

C.4. Creation of a Mineral Production Monitoring and Oversight Committee (US\$300,000): The

Government's commitment to improve phosphate production to reach historical high past annual records and SNPT's output levels of 3 million tons per annum have not materialize to date despite its official adoption of a new Phosphate Development Strategy. Substantial increases in official statistics of SNPT regarding its output and export levels were officially announced starting Year 2012. No substantive change in production pattern has yet materialized in the official public records concerning phosphate production by SNPT. Many reasons have been advanced for that. However, one recurrent theme since, has been the need for SNPT to increase expenditures to invest more and more on equipment purchases to fill the production gap. Despite sizeable and mounting investment, no significant improvement in phosphate production has been officially recorded. EITI has attempted to capture some of the production data, but by its very nature, it establishes a time lag of 2 years in information gathering and hence disclosure, which does not favor adequate monitoring of mineral production in Togo.

The project will establish a Mineral Production Monitoring and Oversight Committee comprised of multi stakeholders prior to effectiveness.

C.5. Building Capacity for Women in Mining (US\$300,000)

Mining and related activities can potentially transform life in resource-rich developing countries. They can help drive economic growth. They can create jobs. They can reduce poverty. For women in particular, extractive industries can provide opportunities for a better life, including increased employment opportunities, access to revenues, and expanded investment in the local community. Ensuring that men and women have equitable access to the benefits of resource development, and that neither are disproportionately placed at risk, requires commitment to understanding and acting on the gender dimensions of the sector. This means including women in community-level project consultations, and national-level policy dialogues on extractive industries. The Bank is developing new opportunities to engage with Governments and the private sector to ensure that women, who are now a part of the global development dialog across multiple sectors, are not excluded from the extractive industries, for the sake of better opportunities, reduced poverty, and shared prosperity. To achieve the stated objectives, the project will particularly focus on two aspects of the program on Gender as described below: (i) to undertake a detailed assessment of the current situation of women and girls, including the assessment of all existing and relevant initiatives, women's groups, CSOs and other organizations whose activities are related to gender (women) the mining sector of Togo; and (ii) to design a country-specific institutional framework in consultation with all key stakeholders. The project will go one step further and will assist Togo in the establishment of a national structure (whose generic name could be somewhere along the line of FEMINTO), with the objectives and mandate to implement a roadmap that extends to medium term, with clear objectives defined.

C.6. Strengthening Civil Society Organization's and Participation in Extractives (US\$300,000):

Specific tools will be designed and implemented to ensure that the project's activities contribute strongly to increased citizen oversight for transparency and good governance in the extractive industries and increased knowledge and public awareness on the characteristics of the exploitation of mineral and EI resources. Long-term benefits of strengthening CSOs capacity include the sustained impact achieved by this project as the activities to be carried out will be driven by the organizations themselves and implemented by a consortium of Togolese CSOs. It is expected that civil society also develop strong ownership of the project's activities from implementation start-up considering that the project, especially if CSOs are made to be involved from the start-up of operations. Other benefits to CSO representatives include: (i) improved ability to learn and debate issues regarding EI data such as the need for disaggregated revenue information by region, and (ii) EI company to insure that local

communities receive their fair share of mining revenues and suggestion to improve the tax collection mechanism and inter-agency revenue flow for citizens to better understand the share of EI revenues they are owed at the sub-national level. CSOs in Togo have expressed their interest to go beyond central Government revenue monitoring and start monitoring revenue use by local (communes) governments. In this regards, alternative channels will be explored, which include the creation of tripartite community development platforms to contribute to the generation of broad-based socio-economic development and coordinate related EI revenue investment decisions at the national level. A specific program will aim to increase CSO's knowledge on the significance of EITI on the EI value-chain including concepts such as contract transparency, exploration licenses, fiscal regime in EI, best practices in environmental and social monitoring, and corporate social responsibility.

The project will allow groups (grassroots civil society members) who are removed from policy discussions to interact with more active CSO representatives, local leaders and with representatives from a mining/EI company as well as to increase their capacity to interpret and use EI information/data to increase accountability. Considering the importance of CSOs participation in the national EI debate, the project will catalyze donor's funding around the development of an effective communication process among CSOs (beyond the project) and mechanism to communicate the concerns of grassroots communities to the Government.

C.7. Setting-up Accountability and Community Development Platforms (US\$250,000): To improve governance and minimize the potential effects of the resource curse, in addition to strengthening public institutions and developing transparency processes, it is critical to set up stronger accountability mechanisms. Accountability includes the relationships between the mines (private and public, formal and informal) and Government (provincial and central); among Government and parliament and civil society more broadly; and between the mines and the local communities in which they are located. To increase demand for accountability and transparency across key segments of the value chain, and ensure the participation and empowerment of all stakeholders, including civil society, media, think tanks, unions, professional associations, faith-based organizations, and members of Parliament, the Project will develop and implement a platform for continued dialogue around mining issues. This platform should also enhance the participation of nationals and a better inclusion of the gender dimension in mining benefit sharing. The legal framework (and structure) surrounding the Accountability and Community Development platform will be defined and officially established prior to actual start-up of project's activities. The structure of this platform will be defined in close coordination with EITI and other existing entities and forums. The development and implementation of an information and communication strategy would once again facilitate the sharing of sector knowledge and help to create the conditions for a meaningful dialogue among stakeholder.

This component of the project will also help to create a pilot accountability and community development committee in the Southern part of Togo where there is a strong concentration of mine both private and public to oversee development interests for populations in the vicinity of the mines area and ensure redistribution of revenues and actual development takes place in those communities. The second phase of the project will target the replication of such platforms at different locations throughout the country.

D. Component D: Project Coordination and Management (total cost US\$2.45 million)

This component will support the Project Implementation Unit, based in the Ministry of Mines, in the management of fiduciary activities, project monitoring and evaluation and the implementation of

activities. This component will support (a) Project coordination and management of procurement, financial management, and disbursement; and (b) monitoring and evaluation of project implementation, including reporting, audits and assessment of safeguards policies. A Project Implementation Unit (PIU) will be established under the PPF, composed of staff of the MME. In addition to the financial management and procurement units, the PIU will include a small technical group composed of consultants as staff. The PIU is under the authority of the Minister of Mines and Energy but is supervised by (a) multi-stakeholder Accountability and Community Development Platform (a sort of Technical Monitoring Committee) that will deal specifically with implementation aspects and impact of the project in the designated project area; and (b) a high level Strategic Coordination Committee (SCC) on policy aspects.

Project Preparation Facility Refinancing Category (US\$2.00 million, all IDA). The Credit includes a Project Preparation Advance (PPA) of US\$2.00 million. The PPA supports the setting up of the PMU (key functions only), procurement of office equipment for the PMU, safeguards measures, the establishment of the Mineral Production Monitoring Committee and the High-Level Strategic Oversight Committee, the Accountability and Community Development Platform Committee, and the TORs of the baseline studies cited above, all found satisfactory to the Bank. The preparatory steps for Project Implementation, include the preparation of the Project Operations Manual, first year Annual Work Plan and Budget and commencement of Project procurement.

Contingency Allowance (US\$ 1 million). Allowance is made for unforeseen additional costs that may occur during project implementation. However, the contingency allowance will be restricted to project activities not related to the following: PIU's activities and operating costs, any of the oversight committee's activities and operating costs, workshops, training or equipment purchase.

4. Project location and salient physical characteristics relevant to the safeguard analysis (if known)

To be determined at a later stage

5. Environmental and Social Safeguards Specialists

Paivi Koskinen-Lewis (GSURR)

Abdoulaye Gadiere (GENDR)

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/ BP 4.01	Yes	The proposed project is Technical Assistance (TA) aimed at strengthening the legal, regulatory and institutional framework, as well as at improving capacity, governance, and planning in the mining sector. The project does not involve civil works or land acquisition. However, future mining development activities are expected to build on the TA activities and will have environmental and social adverse impacts that would be regulated under the strengthened legal and institutional framework. OP 4.01 is triggered to cover the preparation of the SESA. To this end, the GoT has prepared terms of reference for a Sectoral Environmental and Social

		Assessment (SESA), which have been validated at a national workshop held in Lomé 9/5/2014, subsequently approved by the World Bank and disclosed both in-country 10/1/14 online and 10/2/14 in a national newspaper and at the InfoShop on 10/8/2014. This sectoral assessment will be carried out as part of the project implementation. Infoshop prior to Appraisal. The SESA will examine the current situation in the sector in terms of environmental and social management and describe potential environmental and social impacts in the sector, including site-specific and cumulative impacts, pollution, health and safety, and social issues (e.g inclusion, gender, vulnerable groups, land administration/Management, labor issues, conflict, etc.). This assessment will draw on extensive consultations with stakeholders and include discussions on community participation in the sector, governance, transparency and conflict resolution.
Natural Habitats OP/BP 4.04	No	The project does not involve any civil work or any activity entailing direct or indirect habitat conversion
Forests OP/BP 4.36	No	The project does not involve any activity that will affect forest ecosystems.
Pest Management OP 4.09	No	The project will not support procurement of any pesticide, and no activity is expected to increase the use of agrochemicals.
Physical Cultural Resources OP/BP 4.11	No	The project does not involve or affect physical cultural resources.
Indigenous Peoples OP/BP 4.10	No	There are no Indigenous Peoples in the project area.
Involuntary Resettlement OP/BP 4.12	No	The project does not involve any civil works, land acquisition and/or resettlement or subsequent loss of assets or access to resources.
Safety of Dams OP/BP 4.37	No	Not applicable
Projects on International Waterways OP/BP 7.50	No	Not applicable
Projects in Disputed Areas OP/BP 7.60	No	Not applicable

II. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:
<p>Since the proposed project is technical assistance (TA) by nature, no direct adverse environmental or social impacts are foreseen. The project does not involve any civil works or land acquisition. The Operational Policy on Environmental Assessment, OP 4.01, is triggered to cover the preparation of the Sectoral Environmental and Social Assessment, SESA.</p> <p>The GoT has prepared terms of reference for a Sectoral Environmental and Social Assessment (SESA), which have been validated at a national workshop in Lomé on 9/5/2014 and approved by the World Bank. The ToR have been disclosed publicly in-country, online at www.republicoftogo.com and www.togomines.com on 10/1/2014 and in the newspapers Togo Press on 10/2/2014 and L'Union on 10/3/2014; and at the World Bank's InfoShop on 10/8/2014. The proposed SESA will cover the following issues: (i) examine the current situation of the mining sector in terms of environmental and social issues and their management; (ii) describe potential environmental and social impacts in the sector, including site-specific and cumulative impacts, pollution, health and safety, and social issues (e.g inclusion, gender, vulnerable groups, land administration/management, labor issues, conflict, etc.); (iii) identify gaps and risks in the existing management systems for environmental and social issues; (iv) provide recommendations for improvement of the regulatory legal and institutional framework and overall management of environmental and social impacts as well as address capacity building needs.</p> <p>This assessment will draw on extensive consultations with various levels of stakeholders, including discussions on community participation in the sector, as well as topics such as governance, transparency and conflict resolution.</p>
2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:
<p>Even though the current project does not finance any "hard" investments, future mining development activities will eventually have adverse environmental and social impacts. These will be regulated under the improved legal and institutional framework, which this TA aims to strengthen.</p>
3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.
<p>N/A</p>
4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.
<p>Togo is currently significantly challenged in the environmental and social management of the mining sector because of the inadequately staffed and/or trained personnel in key ministries, including the Ministry of Mines and the Ministry of Environment.</p> <p>The safeguards team (both social and environment) will work closely not only with the Ministry of Mines and the Ministry of Environment's Task teams on mining issues, but also with civil society and communities at the vicinity of mines.</p> <p>The ongoing revision of the Mining legislation puts special emphasis on environmental issues. As such, the capacity of the relevant institutions will be deemed appropriate to handle the new project once the new Mining Law is passed. Meanwhile the project will conduct a detailed assessment of existing tools in place to monitor environmental and social issues related to mining.</p> <p>In sum, the project is designed to assist the Government of the Republic of Togo (i) to put in place the appropriate legal, regulatory and fiscal frameworks, as well as updated social, environmental and other relevant standards and guidelines; (ii) to build capacity to increase oversight for technical, economic, environmental, health and safety compliance of the sector; (iii) to promote</p>

transparency and build accountability mechanisms; and (iv) to stimulate further socio-economic benefits particularly for vulnerable groups.
5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.
Key stakeholders include the relevant ministries (mining, environment), the national environmental agency, private sector and mining companies, communities living in the vicinity of mining areas as well as working in the mining sector (including particularly women), NGOs involved in extractives and mining industry and civil society at large. These groups have participated in the validation of the ToRs for the SESA, and their engagement will continue during the preparation of the SESA.

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other	
Date of receipt by the Bank	25-Sep-2014
Date of submission to InfoShop	08-Oct-2014
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	
"In country" Disclosure	
Togo	01-Oct-2014
<i>Comments:</i> Published on-line at www.republicoftogo.com and www.togomines.com on 10/1/2014 and in the newspapers Togo Press on 10/2/2014 and L'Union on 10/3/2014.	
If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.	
If in-country disclosure of any of the above documents is not expected, please explain why:	

C. Compliance Monitoring Indicators at the Corporate Level

OP/BP/GP 4.01 - Environment Assessment	
Does the project require a stand-alone EA (including EMP) report?	Yes [<input type="checkbox"/>] No [<input checked="" type="checkbox"/>] NA [<input type="checkbox"/>]
The World Bank Policy on Disclosure of Information	
Have relevant safeguard policies documents been sent to the World Bank's InfoShop?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
All Safeguard Policies	
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have costs related to safeguard policy measures been included in the project cost?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]

III. APPROVALS

Task Team Leader:	Name: Brigitte Marie Khadidja B	
<i>Approved By</i>		
Regional Safeguards Advisor:	Name: Alexandra C. Bezeredi (RSA)	Date: 01-Dec-2014
Practice Manager/ Manager:	Name: Christopher Gilbert Sheldon (PMGR)	Date: 03-Dec-2014