



RÉPUBLIQUE TOGOLAISE

## GULF OF GUINEA NORTHERN REGIONS SOCIAL COHESION PROJECT

### Final

# ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

28<sup>th</sup> February 2022

# Togolese Republic

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

1. The Government of the Togolese Republic (the “Recipient”) shall implement the Gulf of Guinea Northern Regions Social Cohesion Project (P175043) (hereinafter the “Project”), through the Ministry of Grassroots Development, Youth and Youth Employment. The International Development Association (the “Association”) has agreed to provide funding for the Project.
2. The Recipient shall ensure that the Project is carried out in accordance with Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. This ESCP sets out the material measures and actions to be carried out or caused to be carried out by the Recipient, including the timeframes for carrying out the actions and measures, the institutional, staffing, training, monitoring, and reporting arrangements, grievance management and the environmental and social assessments and instruments to be prepared or updated, consulted, disclosed, or re-disclosed, adopted, and implemented in accordance with the ESSs.
3. The Recipient shall also comply with the provisions of all other E&S instrument required under the Environmental and Social Framework (ESF) and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF) integrating the Pest Management Plan (PMP), the Resettlement Framework (RF), the Stakeholder Engagement Plan (SEP), the Labor Management Procedures (LMP), the Grievance Mechanism (GM), the Sexual Exploitation and Abuse /Sexual Harassment (SEA / SH) Prevention and Management Action Plan; the Security Risk Assessment (SRA) and the Security Management Plan (SMP); and all other instruments and deadlines specified.
4. The Recipient shall be responsible for compliance with all the requirements of the ESCP, even when the implementation of certain specific measures and actions is carried out by the ministries or agencies mentioned in paragraph 1 above.
5. The implementation of the material measures and actions defined in this ESCP shall be monitored and reported to the Association by the Recipient, in accordance with the requirements of the ESCP and the terms of the Legal Agreement, and the Association shall monitor and evaluate the progress and completion of these measures and actions throughout the implementation of the Project.
6. As agreed between the Association and the Recipient, the ESCP may be revised as necessary, during the Project implementation to reflect the adaptive management of Project changes and unforeseen circumstances, or in response to the assessment of the Project’s performance under this ESCP. In such circumstances, the Recipient shall accept the changes with the Association and revise the ESCP accordingly to reflect the agreed-upon changes. The agreement on the amendments to the ESCP shall be documented by the exchange of letters signed by the Association and the Recipient or its delegate. The Recipient shall promptly disclose the revised ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
<b>MONITORING AND REPORTING</b>			
A.	<p><b>REGULAR REPORTING:</b>  <i>The Recipient shall prepare and submit to the Association regular environmental and social monitoring reports indicating the performance of the Project, including but not limited to: (i) environment, social, health and safety (ESHS); (ii) ESCP implementation; (iii) stakeholder engagement activities, operation of SEA / SH sensitive grievance mechanism (s); (iv) the preparation and implementation status of the E&amp;S documents required under the ESCP.</i></p>	<p><i>Quarterly reports, starting from Effective Date, prepared throughout the implementation of the Project.</i></p>	<p><i>Project Implementation Unit (PIU)</i></p>
B.	<p><b>INCIDENTS AND ACCIDENTS:</b>  <i>The Recipient shall promptly notify the Association any incident or accident related to the Project that has, or is likely to have, a significant negative impact on the environment, the affected communities, the public and the Project workers. These incidents or accidents can be linked to: water and soil pollution, poisoning by pesticides, damage to the property of an individual or a community, the degradation of a particular ecosystem such as a protected area, incidents or accidents on the Project sites, land conflicts, labor migration, discrimination (for example, discrimination against women, young people, people with disabilities, and minority groups), the exclusion of vulnerable or disadvantaged individuals or groups, cases of SEA / SH, working conditions, child labor, forced labor, handling of Project-related complaints, etc.</i></p> <p><i>The Recipient shall provide the Association with sufficient details regarding the incident and / or accident, indicating the immediate measures taken or planned to remedy it, including any other information provided by a contractor and/or supervising entity, where appropriate.</i></p> <p><i>Subsequently, upon request of the Association, the Recipient shall prepare a report on the incident or accident and propose measures to prevent its recurrence.</i></p>	<p><i>Notify the Association within 48 hours of becoming aware of the incident or accident.</i></p> <p><i>Ensure the provision of assistance to survivors of SEA / SH for medical care, psychosocial support and legal assistance by way of referral to relevant SEA/SH service providers in the Project area within 48 hours.</i></p> <p><i>This systematic reporting system shall remain in place throughout the Project implementation</i></p> <p><i>A detailed report shall be prepared and provided within a maximum of 5 working days. The reporting of SEA / SH cases shall be based on the principle of confidentiality and security of the survivor's identity and shall be kept in a secure location with limited access.</i></p>	<p><i>PIU</i></p>

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C.	<p><b>CONTRACTORS MONTHLY REPORTS</b></p> <p>As part of the contractors and suppliers' contracts, contractors are required to provide the PIU with monthly site monitoring reports on environmental, social, health and safety aspects. These monthly reports shall be sent to the Association by the Recipient on request, if necessary.</p>	<p>Monthly reports prepared from the signing of the contracts, throughout the duration of Project's works</p>	<p>- PIU -Contractors -Services Providers / Suppliers</p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>The Recipient shall create and maintain an organizational structure, the Project Coordination Unit (PIU) with qualified staff and appropriate resources to support the management of environmental, social, health and safety (ESHS) risks of the Project.</p> <p>The PIU shall recruit or appoint (i) an Environmental specialist, and a Social specialist (including SEA/SH aspects) to ensure the implementation of the E&amp;S documents prepared under the Project; and (ii) a Security specialist, charged with all security monitoring/management aspects, including liaison with the armed forces, local communities, and security audits of Project sites.</p> <p>ANADEB, through its regional branches involved in the project, will recruit E&amp;S focal points to support the work of the E&amp;S specialists of the central PIU. These specialists shall regularly report to the central PIU regarding the environmental and social compliance of activities at the local level.</p> <p>The qualifications, experience, and terms of reference for the recruitment of all these E&amp;S and security specialists shall be approved by the Association.</p> <p>The Recipient shall ensure, through the coordinator of the Project, that the specialists in environmental and social safeguards carry out their missions relating to the environmental and social management of the Project, including</p>	<p>The PIU shall be set up prior to the Project Effective Date.</p> <p>Environmental and social specialists within ANADEB Regional branches shall be recruited not later than three (3) months after the Effective Date</p> <p>Organizational structure, including E&amp;S and Security specialists, should be maintained throughout Project implementation</p>	<p>The National Agency for Grassroots Development Support (ANADEB)</p> <p>PIU ANADEB</p> <p>PIU</p>

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<p><i>the prevention and management of the SEA/SH, and in accordance with the Project Implementation Manual (PIM).</i></p>		
<p><b>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT:</b>  <i>The Recipient shall prepare, consult, adopt, disclose and implement the Environmental and Social Management Framework (ESMF) to identify and assess the risks and potential negative environmental and social impacts of the Project, (including, inter alia, security risks and SEA / SH), as well as appropriate mitigation measures. A particular emphasis shall be placed on consulting women’s groups to identify their needs and suggestions during the assessment and other vulnerable person or groups to ensure the integration of their particular needs into the Project risks mitigation measures.</i></p>	<p><i>The ESMF has been prepared, disclosed, consulted, and adopted on December 22, 2021, and shall be implemented thereafter throughout the Project implementation.</i></p> <p><i>Site-specific ESIA/ESMPs shall be prepared before implementation of the relevant Project activities and implemented throughout cycle of said activity.</i></p>	<p><i>PIU</i></p>
<p><b>1.3 MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p><i>The Recipient shall develop, disclose, consult upon, adopt and implement the following risk assessment and management tools and instruments, in accordance with the ESSs and in a manner acceptable to the Association:</i></p> <ul style="list-style-type: none"> <li><i>- Environmental and Social Management Framework (ESMF) including a Pest Management Plan (PMP)</i></li> <li><i>- Resettlement Framework (RF);</i></li> <li><i>- Resettlement Plan (s) (RP)</i></li> <li><i>- Labor Management Procedure (LMP);</i></li> <li><i>- Stakeholder Engagement Plan (SEP), including the Grievance Mechanism (GM) at Project level;</i></li> <li><i>- The Security Risk Assessment (SRA) and the Security Management Plan (SMP);</i></li> <li><i>- Environmental and Social Impact assessments specific to each site (ESIA, with site-specific ESMPs, SEA / SH action plans E&amp;S Audit as needed);</i></li> <li><i>-Environmental and Social Management Plan (ESMP)</i></li> </ul>	<p><i>ESMF and RF have been developed, disclosed, consulted upon, and adopted on December 22 and December 16, 2021, respectively..</i></p> <p><i>SEP has been developed and disclosed before the Project Appraisal.</i></p> <p><i>LMP has been developed, disclosed, consulted upon, and adopted on February 5, 2022.</i></p> <p><i>SRA has been developed and adopted before the Project Appraisal.</i></p> <p><i>The SMP shall be developed, and adopted before Project Effectiveness.</i></p> <p><i>Site-specific instruments shall be prepared, disclosed, consulted upon, and adopted prior to</i></p>	<p><i>PIU</i></p>

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	<p>- SEA / SH Prevention and Management Action Plan.</p>	<p><i>the start of any activity requiring the development of a specific E&amp;S instrument and shall be thereafter implemented throughout Project implementation.</i></p> <p><i>The SEA / SH Prevention and Management Action Plan shall be developed, disclosed, consulted upon, and adopted no later than three (3) months after the Project Effective Date.</i></p> <p><i>All these instruments shall be implemented throughout the duration of the Project.</i></p>	
1.4	<p><b>MANAGEMENT OF CONTRACTORS:</b>  <i>The Recipient shall incorporate the relevant aspects of this ESCP, including the relevant E&amp;S and safety documents and / or plans, as well as the LMP, into the ESHS specifications of the procurement documents and contracts with the contractors and Supervising Engineers.</i></p> <p><i>The Recipient shall ensure that contractors (i) comply with the ESHS specifications of their respective contracts, and (ii) ensure that their subcontractors comply with the ESHS specifications of their respective contracts in accordance with the management tools and instruments referred to in section 1.3 above</i></p>	<p><i>During the preparation of the procurement documents and before the signing of the contract and effective start of the relevant services or works.</i></p> <p><i>Implementation and maintenance of these measures throughout the Project implementation</i></p> <p>Supervise contractors and supervising Engineers, throughout the Project implementation.</p>	PIU
1.5	<p><b>THIRD PARTY MONITORING</b>  <i>The Recipient shall mobilize, if necessary, local relevant regulatory authorities, the technical institutions involved in the Project (ANADEB, ANGE, CIPLEV / Inter ministerial Committee for the Prevention and Fight against Violent Extremism, etc.), NGOs, community organizations, etc. to</i></p>	<p><i>Throughout the Project implementation</i></p>	PIU Third Party Monitor

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<p><i>complete or verify the monitoring information to monitor the environmental and social performance of the Project.</i></p> <p><i>The results of their monitoring shall be included in the quarterly reports which the Recipient shall prepare.</i></p> <p><i>The Recipient shall also recruit national or international experts to complete and verify the compliance of the risk management of SEA / SH and security risks as part of the Project, where appropriate, with terms of reference, qualifications, and experience acceptable to the Association. The Recipient shall require the third-party consultant, responsible for monitoring, to prepare and submit monitoring reports, which shall be promptly made available to and discussed with the Association and shall promptly take any measures that may be requested by the Association upon its review of the third-party monitor consultant reports.</i></p>		
<p><b>1.6 TECHNICAL ASSISTANCE</b></p> <p><i>The Recipient shall ensure that consultations, studies, capacity, and skills building, training and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, which incorporate the relevant ESSs requirements.</i></p> <p><i>Ensure that any outputs of technical assistance activities are consistent with the ESSs.</i></p>	<p><i>Throughout the Project implementation</i></p>	<p><i>PIU</i></p>
<p><b>1.7 CONTINGENT EMERGENCY RESPONSE COMPONENT (CERC):</b></p> <p><i>a) The Recipient shall prepare a standalone CERC-ESMF and ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements including, if applicable, CERC-ESMF that has been included or referred to in the CERC Manual for the implementation of Contingent Emergency Response, in accordance with the ESSs and in a manner acceptable to the Association.</i></p> <p><i>b) In the event of a crisis leading to the activation of the CERC, the Recipient shall prepare, consult, adopt and disclose all E&amp;S</i></p>	<p><i>a) The preparation and adoption of the CERC Manual and, if applicable, the standalone CERC-ESMF in form and substance acceptable to the Association is a withdrawal condition under Section [XXX] of Schedule 2 of the Financing Agreement for the Project.</i></p> <p><i>b) Submit the required E&amp;S instrument to the Association's prior review and approval and</i></p>	<p><i>PIU</i></p>

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	<i>instruments that may be required for activities under the Contingent Emergency Response Component (CERC) of the Project, in accordance with the CERC Manual and, if applicable, CERC-ESMF and the ESSs, and thereafter implement the measures and actions required under said E&amp;S instruments, within the timeframes specified in said E&amp;S instruments.</i>	<i>adopt it prior to carrying out the relevant Project activities for which the E&amp;S instrument is required. Implement the E&amp;S instruments in accordance with their terms, throughout the Project implementation.</i>	
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
<b>2.1</b>	<b>LABOR MANAGEMENT PROCEDURES</b> <i>The Recipient shall develop, adopt and implement Labor Management Procedures (LMP) prepared for the Project (including, inter alia, the prohibition of SEA / SH, child labor, and forced labor) in accordance with the requirements of ESS2 and in a manner acceptable to the Association.</i>	<i>The LMP has been developed and adopted on February 5, 2022, and will be implemented throughout the implementation of the Project</i>	PIU
<b>2.2</b>	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS:</b> <i>The Recipient shall establish, maintain, and operationalize a grievance mechanism (GM) for project workers, sensitive to SEA / SH, as described in the LMP, in accordance with the provisions of the ESS 2 and the applicable national legislation.</i>  <i>The Recipient shall ensure that workers who use this GM are not subjected to any form of discrimination or retaliation from employers.</i>	<i>The GM shall be established, and operationalized prior to the recruitment of workers, and shall be maintained throughout the Project implementation.</i>	PIU
<b>2.3</b>	<b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES:</b> <i>The Recipient shall prepare, adopt, and implement the occupational health and safety (OHS) measures specified in the ESIA / ESMP and ensure that the Project contractors develop and implement an OHS plan, all in accordance with ESS 2 and in a manner acceptable to the Association.</i>	<i>The final plan shall be established before the start of the work. These measures shall be maintained throughout the Project implementation.</i>	PIU
<b>2.4</b>	<b>EMERGENCY PREPAREDNESS AND RESPONSE</b>  <i>The Recipient shall adopt and implement emergency preparedness and response measures and reflect those measures in the Project ESMF and ESIA / ESMP.</i>	<i>Prior to the start of the works and throughout the implementation of the Project.</i>	- PIU - Supervising Engineer. - Suppliers and Contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
	<p><i>The Recipient shall ensure that the Project contractors prepare, adopt, and implement an emergency preparedness and response plan. The emergency situations of each sub-project shall be identified in the ESIA reports and Contractor's ESMP (C-ESMP) or in an ESMP for community-driven development work (CDD), as well as the measures for their prevention and management shall be notified in said reports.</i></p> <p><i>The Recipient shall immediately report any major emergency (e.g., spills, attacks, pollution, accidents causing significant damage) in accordance with section B of this ESCP.</i></p>		
<b>ESS 3: RESOURCES EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b>			
<b>3.1</b>	<p><b>POLLUTION PREVENTION AND MANAGEMENT:</b></p> <p><b>Waste and Hazardous Materials Management:</b>  <i>The Recipient shall develop, adopt, implement measures and reflect those measures in the Project ESMF and ESIA/ESMPs, to manage waste and hazardous materials in accordance with ESS 3 and in a manner acceptable to the Association.</i></p> <p><i>The Recipient shall ensure that contractors develop, adopt, and implement a waste and hazardous materials management plan (common and specific waste) in accordance with the provision of the ESMF and site specific ESIA/ESMP, in a manner acceptable to the Association.</i></p> <p><b>Pesticides management:</b>  <i>The Recipient shall ensure that the prevention and management measures for risks and potential impacts provided for in the Pest Management Plan (PMP), included in the Project ESMF, are applied in a manner acceptable to the Association.</i></p>	<p><i>The measures shall be adopted before the actual start of the relevant works. These measures and actions shall be maintained and implemented throughout the implementation of the Project.</i></p>	PIU
<b>3.2</b>	<p><b>RESOURCE EFFICIENCY :</b>  <i>The Recipient shall develop, adopt, implement rationalization measures on raw materials, energy and water use and the</i></p>	<p><i>Measures shall be adopted prior to the start of works and implemented and maintained throughout the Project implementation.</i></p>	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
	<i>maintenance of its quality, and reflect those measures in the Project ESMF and ESIA/ESMPs, to manage efficient consumption of these resources in accordance with ESS3 and in a manner acceptable to the Association.</i>		
<b>ESS 4: COMMUNITY HEALTH AND SAFETY:</b>			
<b>4.1</b>	<p><b>TRAFFIC AND ROAD SAFETY:</b>  <i>The Recipient shall ensure that contractors / supervising entities develop, adopt, and implement measures and actions to assess and manage the risks related to traffic and road safety (including, among others, a road traffic and safety plan in particular a plan for the movement of construction equipment and detour routes), in accordance with ESS 4 requirements.</i></p>	<i>Prior to the start of works and maintained throughout the implementation of the Project.</i>	<ul style="list-style-type: none"> <li>- PIU</li> <li>-Supervising Engineer</li> <li>-Contractors</li> </ul>
<b>4.2</b>	<p><b>COMMUNITY HEALTH AND SAFETY:</b>  <i>The Recipient shall ensure the Contractors / supervising entities develop, adopt, and implement measures and actions to assess and manage the following Project-related risks and impacts, in accordance with ESS 4 requirements and in a manner acceptable to the Association.</i></p> <p><b>SEA / SH risks</b>  <i>The Recipient shall develop, disclose, consult upon, adopt, and implement the SEA / SH prevention and mitigation action plan referred to in section 1.3 above.</i></p> <p><b>Risks associated with the spread of COVID-19</b>  <i>The Recipient shall develop, disclose, consult upon, adopt, and implement the action plan as part of the ESIA/ESMP for the prevention and management of risks related to the spread of COVID-19, prepared in order to manage this risk on all Project work sites.</i></p> <p><b>Security risks</b>  <i>The Recipient shall assess the security risks, and, thereafter, develop, adopt and implement the Security Management Plan</i></p>	<p><i>Prior to the start of the effective work. These measures shall be maintained throughout the implementation of the Project.</i></p> <p><i>The SEA / SH Prevention and Management Action Plan shall be developed, disclosed, consulted upon, and adopted no later than three (3) months after the Project Effective Date.</i></p> <p><i>Three (3) months after Project Effective Date and throughout the Project implementation. The COVID-19 prevention action plan shall be updated as necessary to respond to the contexts of the sub-project areas.</i></p> <p><i>The SMP shall be developed and adopted prior to the Project Effective date and implemented</i></p>	<ul style="list-style-type: none"> <li>- PIU</li> <li>-Supervising Engineer</li> <li>-Contractors</li> </ul>

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<p><i>(SMP), prepared for the Project, to manage the risks of recurring security incidents and threats under the Project, in accordance with the requirements of ESS 1 and ESS 4 and in a manner acceptable to the Association.</i></p>	<p><i>throughout the Project implementation. The action plan shall be updated as needed, depending on the evolution of the security context of sub-projects areas.</i></p>	
<p><b>4.3</b> <b>SECURITY PERSONNEL:</b> <i>The Recipient shall prepare, adopt, and implement a standalone security management plan (SMP), based on the Security Risk Assessment (SRA) in accordance with the requirements of ESS 4, in a manner acceptable to the Association.</i></p> <p><i>The following measures shall be adopted to ensure that the engagement to security or personnel (in the implementation of Project activities), for provision of security of Project workers, sites and / or assets, is carried out in accordance with ESS 4:</i></p> <p><i>a. Assess the risks, impacts of engaging security personnel, and implement measures to manage these risks and impacts, (including a stand-alone security management plan), guided by the principles of proportionality and good international industry practices, and by applicable law, with regard to the recruitment, rules of conduct, training, equipping and monitoring of such security personnel;</i></p> <p><i>b. Adopt and apply standards, protocols and codes of conduct for the selection and use of security personnel, and screen such personnel to verify that they have not engaged in illegal or abusive behavior in the past, including SEA / SH or excessive use of force;</i></p> <p><i>c. Ensure that such personnel is properly instructed and trained, prior to deployment and on a regular basis, on the use of force and proper conduct, as outlined in the Project Operational Manual, ESMF, and Security Risk Management Plan.</i></p> <p><i>d. Ensure that the stakeholder engagement activities under the Stakeholder Engagement Plan (SEP) include a communication</i></p>	<p><i>Before the effective start of activities</i></p> <p><i>During and after the execution of the Project.</i></p>	<p><i>- PIU</i></p> <p><i>- Contractors, supervising entity</i></p> <p><i>-Security services</i></p>

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	<p>strategy on the involvement of security personnel in the Project;</p> <p>e. Ensure that any concerns or grievances regarding the conduct of security personnel are received, monitored, documented (considering the need to protect confidentiality), resolved through the Project grievance mechanism (see action 10.2 below) and reported to the Association no later than two (2) days after being received; and</p> <p>f. When the Association so requires, after consultation with the Recipient: (i) promptly appoint a third-party monitoring consultant, whose terms of reference, qualifications and experience are satisfactory to the Association, in order to visit and monitor the Project area where security personnel are deployed, collect relevant data and communicate with Project stakeholders and beneficiaries; (ii) request the third-party consultant in charge of monitoring to prepare and submit monitoring reports, which shall be quickly made available to the Association and discussed with it; and (iii) promptly take any action requested by the Association after examining the reports of the monitoring third party consultant.</p>		
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p><b>RESETTLEMENT FRAMEWORK AND RESETTLEMENT PLANS:</b> The Recipient shall develop, disclose, consult, adopt and implement a Resettlement Framework (RF) for the Project, in accordance with ESS 5, while ensuring that women and other vulnerable person and groups have equal access to resettlement-related opportunities and compensations and that any risks potentially associated with resettlement are considered in the RF, in a manner satisfactory to the Association.</p> <p>Where appropriate, develop, disclose, consult, adopt and implement a site-specific Resettlement Plan (RP), for identified sites as provided in the RF and consistent with ESS 5. All RPs</p>	<p>The RF has been prepared, disclosed, consulted, and adopted on December 16, 2021, and will be implemented throughout the Project implementation</p> <p>Disclose, adopt, and implement the respective RP, before the start of Project activities or works to which the RP relates.</p>	<p>-PIU</p> <p>- The Expropriation Commission (COMEX) housed within the Ministry of the Economy and Finance.</p>

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	<i>must be approved by the Association and disclosed nationally and on the Association's website.</i>		
5.2	<p><b>MONITORING AND REPORTING:</b> <i>The Recipient shall prepare an implementation report for the monitoring of any land acquisition and resettlement activities.</i></p> <p><i>This report shall be submitted to the Association for approval before the start of the relevant work.</i></p>	<i>Prior to the start of relevant works</i>	-PIU -Implementing agency -NGO
5.3	<p><b>GRIEVANCE MECHANISM (GM) :</b> <i>The Recipient shall ensure that the Project RF and site-specific RPs reflect the Project GM, and are sensitive to SEA/SH, to which complaints and comments on involuntary resettlement associated with the Project may also be addressed. This GM shall be operational and accessible to all those affected by land acquisition and resettlement activities.</i></p>	<i>Prior to the start of RP implementation</i>	- PIU  -Implementing agency -NGO
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS:</b></p> <p><i>The Recipient shall implement biodiversity management measures set out in the Project ESMF and the ESIA / ESMP in a manner acceptable to the Association.</i></p> <p><i>Where a site specific ESIA/ESMP identifies significant impacts on biodiversity, the Recipient shall prepare, adopt, and implement a biodiversity management plan.</i></p> <p><i>Specific E&amp;S instruments shall be submitted to the Association for approval before launching the procurement documents and contracts with contractors and supervising entities.</i></p>	<i>Prior to the start of Project activities.</i>	PIU
<b>ESS 7: INDIGENOUS PEOPLES/ SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
	<i>Not applicable to the Project</i>		
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<p><b>CHANCE FINDS:</b> <i>The Recipient shall develop, adopt and implement a management plan for the cultural heritage that may be affected by the Project, if any, as well as procedures</i></p>	<i>Before the start and throughout the work.</i>	PIU

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	<p>relating to chance finds as described in the ESMF. Clauses on these “chance finds” shall be included in all works contracts, even in cases where the probability is very low.</p> <p>This “chance finds” procedure shall also be carried out by the PIU, in collaboration with the communities for the activities to be implemented by the community workers and as part of the CDD approach.</p> <p>The ESMF proposes a procedure in the event of the “chance finds” of cultural remains, in accordance with national legislation and the practices of the ministry responsible for culture. Likewise, any ESIA / ESMP to be prepared shall include such a section on cultural heritage. These measures shall be consistent with ESS 8 requirements.</p>		
<b>ESS 9: FINANCIAL INTERMEDIARIES (FI)</b>			
	Not applicable to the Project		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
<b>10.1</b>	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION:</b> The Recipient shall prepare, disclose, consult upon, adopt, and implement a Stakeholder Engagement Plan (SEP) including measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation, all in accordance with ESS10 and in a manner acceptable to the Association.</p> <p>The Recipient shall recruit a local NGO or a local specialized agency to support the implementation and monitoring of the SEP.</p>	<p>SEP has been prepared and disclosed prior to Project Appraisal and shall be finalized and adopted prior to the Effective Date.</p> <p>SEP shall be implemented throughout the Project implementation.</p>	PIU
<b>10.2</b>	<p><b>PROJECT GRIEVANCE MECHANISM (GM)</b></p> <p>The Recipient shall, establish, disclose, maintain and operate an accessible Grievance Mechanism (GM), to receive and</p>	The GM shall be operational prior to the Effective Date	<p>- PIU</p> <p>-Psychosocial and legal assistance centers</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
<p><i>facilitate the resolution of concerns and grievances related to the entire Project, promptly and effectively, in a transparent, culturally appropriate and readily accessible manner to all Project-affected-parties, at no cost and without retribution, including concerns and grievances filed anonymously, all in accordance with the ESS 10.</i></p> <p><i>The GM shall also receive, register, and address concerns and complaints related to SEA / SH in a safe and confidential manner, with specific entry points for survivors and ensure a referral system to provide assistance to survivors as required, through identified GBV service providers in the Project area.</i></p> <p><i>The GM shall be supported by a communication plan to ensure that the local populations affected by the Project are aware of the existence of this mechanism and know the procedures for filing and handling complaints and other remedies.</i></p>	<p><i>The GM shall be maintained and shall remain operational throughout the implementation of the Project</i></p>	
<p><b>CAPACITY BUILDING (TRAINING):</b></p>		
<p><b>Training on environmental and social standards</b></p> <ul style="list-style-type: none"> <li>- ESS 1 : Assessment and management of environmental and social risks and impacts</li> <li>- ESS 2: Labor and working conditions and the Labor Management Procedures (LMP)</li> <li>- ESS 3: Resource Efficiency and Pollution Prevention and Management</li> <li>- ESS 4 : Community Health and Safety and Security Management Plan (SMP)</li> <li>ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</li> <li>- ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</li> <li>-ESS 8: Cultural heritage</li> <li>-ESS 10: Stakeholder Engagement and Information Disclosure and the Stakeholder Engagement Plan (SEP)</li> </ul>	<p><i>Three (3) months after the recruitment of environmental and social, and security specialists and once every six (6 ) months throughout the implementation of the Project</i></p>	<p><i>PIU with the support of other consultants/ Training Center engaged by the Project if necessary.</i></p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
<p>The training shall target the following elements:</p> <ul style="list-style-type: none"> <li>-Project Steering Committee / Regional Coordination Committee (RCC)</li> <li>-PIU (Social specialist, Environmental specialist, Security specialist, Procurement specialist)</li> <li>- Environmental and Social Focal Points in local level</li> </ul> <p>-NGO working in the environmental and social fields in the project areas</p> <ul style="list-style-type: none"> <li>-Relevant Technical entities</li> <li>- ANGE</li> <li>- Relevant territorial authorities.</li> </ul>		
<p><b>Occupational health and safety training:</b></p> <p>Contractors and supervising entities shall train all workers involved in Project activities, including security personnel, on occupational health and safety, first aid equipment, prevention of emergencies and how to prepare for and react to such situations.</p> <p>Contractors must also ensure that the workers of their subcontractors are trained on the same subjects.</p> <p>The training shall target the following elements:</p> <ul style="list-style-type: none"> <li>- Contractors</li> <li>- Contractors Workers (including subcontractors)</li> <li>-Community workers</li> <li>- Supervising entities</li> <li>- PIU</li> </ul> <p><b>Information, Education and Communication (IEC)</b></p> <p>Raise awareness among contractors' workers, including subcontractors' workers, and Supervising entity mobilized on the sites of environmental and social standards as well as on respect for anti-COVID-19 barrier gestures.</p>	<p>Prior to the start of employment of newly recruited workers and those already working, training would be provided quarterly to ensure that all staff are trained.</p> <p>Throughout the implementation of the Project</p>	PIU
<p><b>Training on labor and working conditions</b></p> <ul style="list-style-type: none"> <li>- Conditions of employment under national labor law;</li> <li>- Code of conduct for suppliers / service providers and subcontractors.</li> </ul>	<p>Prior to the start of employment of newly recruited workers and those already working,</p>	PIU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
<ul style="list-style-type: none"> <li>- workers' organizations;</li> <li>- Rules on child labor and minimum working age;</li> <li>- Workers' rights</li> <li>-Worker complaints and SEA / SH complaints</li> <li>-Discrimination and harassment / SEA / SH incidence</li> </ul> <p>The training shall target the following actors:</p> <ul style="list-style-type: none"> <li>- Contractors workers (including any subcontractors)</li> <li>-Community workers</li> <li>- Supervising Engineers;</li> <li>-NGOs working in the social field in the Project area.</li> </ul>	<p>training would be provided quarterly to ensure that all staff are trained.</p>	
<p><b>Training on environmental and social management</b></p> <p>This training shall provide knowledge on:</p> <ul style="list-style-type: none"> <li>- the process of environmental and social selection and classification of sub-projects;</li> <li>- the procedures for organizing and carrying out the ESIA and the RP;</li> <li>- environmental policies, procedures and legislation in Togo;</li> <li>- Implementation monitoring process of the ESMP and the RP.</li> </ul> <p>The training shall target the following actors:</p> <ul style="list-style-type: none"> <li>-PIU (social specialist, environmental specialist, security specialist, procurement specialist)</li> <li>-Central and local technical structures involved in the Project;</li> <li>- ANGE</li> </ul>	<p>Prior to the start of employment of newly recruited workers and those already working, training would be provided annually to ensure that all staff are trained.</p>	<p>PIU</p>
<p><b>Training on the grievance mechanism</b></p> <p>The training shall focus on the following modules:</p> <ul style="list-style-type: none"> <li>- Registration and processing procedure;</li> <li>- Complaint's resolution procedure;</li> <li>- Documentation and handling of complaints;</li> <li>- Use of the procedure by the various stakeholders;</li> <li>- SEA / SH complaints.</li> </ul> <p>The training shall target the following actors:</p> <ul style="list-style-type: none"> <li>-PIU (Social and environmental specialists, security specialist, procurement specialist),</li> <li>-Local or regional follow-up or grievance management committees.</li> </ul>	<p>Prior to the start of employment of newly recruited workers and those already working, training would be provided quarterly to ensure that all staff are trained.</p>	<p>PIU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
<ul style="list-style-type: none"> <li>-Technical structures</li> <li>- ANGE</li> <li>- Relevant territorial authorities.</li> <li>-NGOs working in the social field in the Project area.</li> </ul>		
<p><b>SEA / SH Risk Training</b></p> <ul style="list-style-type: none"> <li>- Awareness and measures to prevent and mitigate the risks of SEA / SH; Themes, activities and target audiences shall be defined in the SEA / SH action plan;</li> <li>-Dissemination of the SEA / SH action plan (activities, target groups); SEA / SH complaint handling</li> </ul> <p>The training shall target the following actors:</p> <ul style="list-style-type: none"> <li>-PIU (Environmental and social specialists, security specialist, Procurement Specialist, Specialist in Monitoring and Evaluation),</li> </ul> <ul style="list-style-type: none"> <li>-Central and local technical structures,</li> <li>- ANGE</li> <li>- Relevant territorial authorities.</li> <li>-NGOs</li> </ul>	<p>Prior to the start of employment of newly recruited workers and those already working, training would be provided quarterly to ensure that all staff, actors and stakeholders involved are trained.</p>	<p>PIU</p>
<p><b>Training on risks and management during works targeting workers</b></p> <ul style="list-style-type: none"> <li>-SEA / SH, child and forced labor;</li> <li>- GM - including the <b>SEA / SH</b> related grievance mechanism;</li> <li>- Compliance with the code of conduct clearly mentioning the prohibition of SEA / SH and the penalties in the event of misconduct, etc.</li> <li>-Pollution and damage during the Project works,</li> <li>-Occupational Health and Safety.</li> </ul>	<p>Subcontractors' workers</p> <p>Before the start of work and organize regular refresher sessions</p>	<ul style="list-style-type: none"> <li>- PIU</li> <li>- Contractors</li> </ul>
<p><b>Information / awareness on potential environmental and social risks targeting local populations / communities:</b></p> <p>Information / awareness on potential environmental and social risks, including the Project SEA / SH, to elicit their commitment and participation in the identification of measures aimed at minimizing and mitigating negative environmental and social risks and impacts related to Project implementation.</p>	<p>Before the start of the works and throughout the implementation of the Project</p>	<ul style="list-style-type: none"> <li>- PIU</li> <li>-Contractors</li> <li>- Supervising engineer / supervising entity</li> </ul>