



**ADDITIONAL FINANCING TO TOGO FOR THE
GULF OF GUINEA NORTHERN REGIONS
SOCIAL COHESION PROJECT- P181632 and
GULF OF GUINEA NORTHERN REGIONS
SOCIAL COHESION PROJECT (TOGO) -
P175043**

For Negotiations

**ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

March 10, 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

1. The Republic of Togo (the Recipient) is implementing the Gulf of Guinea Northern Regions Social Cohesion Project (P175043) (the Project), through the National Community Development Support Agency (*Agence Nationale d'Appui au Développement à la Base-ANADEB*) under the supervision of the Ministry of Community Development, Youth and Youth Employment, as set out in the Financing Agreement and the Project Agreement. The International Development Association (the Association) has agreed to provide the Original Financing (P175043) and Additional Financing (P181632) for the Project, as set out in the referred agreement(s). This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for Project referred to above.
2. The Recipient shall ensure that the Project is carried out 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 is a part of the Financing Agreement and the Project Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the Ministry of Community Development, Youth and Youth Employment and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient, represented by the Minister of Economy and Finance. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
MONITORING AND REPORTING			
A.	<p>REGULAR REPORTING :</p> <p>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) aspects; (ii) ESCP implementation; (iii) stakeholder engagement activities, and operation of SEA / SH sensitive grievance mechanism(s); (iv) the preparation and implementation status of the E&S documents required under the ESCP.</p>	<p>Quarterly reports, starting from the Effective Date, prepared throughout the implementation of the Project as it is the case for the parent project.</p>	<p>Project Implementation Unit (PIU)</p>
B.	<p>INCIDENTS AND ACCIDENTS :</p> <p>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 or 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, migrating populations from other regions of the country or abroad), 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.</p> <p>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.</p>	<p>Notify the Association within 48 hours of becoming aware of the incident or accident.</p> <p>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 in accordance with the SEA/SH prevention and management action plan.</p> <p>This systematic reporting system shall remain in place throughout the Project implementation.</p> <p>A detailed report shall be prepared and provided within a maximum of 5 working days, unless a different timeframe is agreed with the Association. 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.</p>	<p>PIU</p>

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<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. This requirement has been implemented under the parent project and will continue to be implemented also for the additional financing.</i></p>		
<p>C. CONTRACTORS MONTHLY REPORTS <i>For the Additional Financing and as in the parent project, as part of the contractors and suppliers' contracts, contractors and suppliers are required to provide the PIU with monthly site monitoring reports on environmental, social, health and safety aspects.</i></p> <p><i>These monthly reports shall be sent to the Association by the Recipient upon request, as needed.</i></p>	<p><i>Monthly reports prepared from the signing of the contracts, and throughout the duration of Project's work.</i></p>	<ul style="list-style-type: none"> - PIU -Contractors -Service providers/suppliers
<p>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</p>		

<p>1.1</p>	<p>ORGANIZATIONAL STRUCTURE</p> <p><i>The parent project has set up an organizational structure, the Project Implementation Unit (PIU) with qualified personnel and appropriate resources to support the management of environmental, social, health and safety (ESHS) risks of the Project.</i></p> <p><i>The staff recruited as part of the parent project will remain in place, in particular an environmental specialist and a social specialist (including SEA /SH aspects) to ensure the implementation of the E&S documents prepared under the Additional Financing; and (ii) a Security specialist, charged with all security monitoring/management aspects, including liaison with the armed forces, local communities, and security audits of the Project sites. The social development specialist will take care of the questions and concerns of displaced and refugee people in order to ensure that their needs are effectively taken into account in the implementation of the project activities.</i></p> <p><i>ANADEB, through its regional branches involved in the Project, has recruited 4 E&S specialist assistants to support the work of E&S specialists from the national PIU. These specialists will liaise with representatives of internally displaced persons/refugees and host communities and maintain dialogue with stakeholders who work with internally displaced persons and refugees and ensure that social risks related to internally displaced persons/refugees are identified, monitored and mitigated. These specialists shall regularly report to the national PIU regarding the environmental and social compliance of activities at the local level. There will be an additional recruitment of assistants in the team of E&S specialists in the regions depending on the extent of the intervention area of the activities under the Additional Financing. The qualifications, experiences, and terms of reference for the additional recruitment of these E&S specialists shall be approved by the Association.</i></p>	<p><i>The PIU set up under the parent project shall be maintained until the closure of the additional financing of the Project.</i></p> <p><i>The two (2) additional environmental and social specialists within the Regional Branches of ANADEB shall be recruited no later than three (3) months after the Effective Date of the additional financing of the Project.</i></p> <p><i>The organizational structure, including E&S and security specialists, shall be maintained throughout the Project implementation (additional funding).</i></p>	<p><i>National Agency for Grassroots Development Support (ANADEB)</i></p> <p><i>ANADEB PIU</i></p> <p><i>PIU</i></p>
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MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
<p><i>Just like in the parent project, 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 the prevention and management of the SEA/SH, and in accordance with this ESCP, Financing Agreement, and the Project Implementation Manual (PIM).</i></p>		
<p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p><i>The environmental and social assessment was conducted through consultations with the various stakeholders under the parent project accompanied by an ESMF, the summary of which was widely disseminated in the beneficiary communities. Additional consultations shall be conducted in the new intervention communities of the additional financing to identify and evaluate the risks and potential negative environmental and social impacts of the Project, (including inter alia, security risks, SEA / SH) as well as appropriate mitigation measures consistent with ESSs. 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 integration of their particular needs into the Additional Financing risks mitigation measures.</i></p>	<p><i>The Environmental and Social Management Framework (ESMF) that has been prepared, disclosed, consulted, and adopted on December 18, 2021 for the parent project, shall be updated, disclosed, consulted, adopted prior to the AF Effective Date and implemented thereafter throughout the Project implementation.</i></p> <p><i>Construction related activities that require a site-specific ESIA/ESMPs shall be prepared, disclosed, consulted, and adopted before implementation of the relevant Additional financing activities and implemented throughout the implementation of the said activity.</i></p>	<p><i>PIU</i></p>

<p>1.3</p>	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p><i>The E&S risk assessment and management tools and instruments have been developed and disclosed under the parent project in accordance with the ESSs and in a manner acceptable to the Association. These tools and instruments shall be maintained in place but shall be updated through inclusive consultations for additional financing in order to take into account risks and impacts associated with the additional financing, including contextual risks, risks related to internally displaced persons and refugees:</i></p> <p><i>Environmental and Social Management Framework (ESMF) including a Pest Management Plan (PMP)</i></p> <ul style="list-style-type: none"> - <i>Resettlement Framework (RF)</i> - <i>Resettlement Plan (RP)</i> - <i>Labor Management Procedure (LMP);</i> - <i>Stakeholder Engagement Plan (SEP), including the Grievance Mechanism (GM) at Project level</i> - <i>Security Risk Assessment (SRA) and the Security Management Plan (SMP);</i> 	<p><i>The ESMF and RF developed, disclosed, consulted upon, and adopted on December 18, 2021 shall be updated, disclosed, consulted and adopted prior to the AF Effective Date and be implemented thereafter throughout Project implementation.</i></p> <p><i>The SEP that has been developed and disclosed before the parent Project Appraisal shall be updated, disclosed, consulted, and adopted on March 11th, 2024 and be implemented thereafter throughout Project implementation.</i></p> <p><i>The LMP that has been developed, disclosed, consulted upon, and adopted on February 5, 2022, shall be updated, disclosed, consulted and adopted prior to the AF Effective Date and be implemented thereafter throughout Project implementation.</i></p> <p><i>The SRA and the SMP that has been developed and adopted before the parent Project Appraisal shall be updated and adopted before the AF Effective Date.</i></p>	<p>PIU</p>
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
	<p>- Environmental and Social Impact assessments specific to each site (ESIA, with site-specific ESMPs, SEA/SH action plans, E&S audit (s), as needed); Environmental and Social Management Plan (ESMP)</p> <p>- SEA / SH Prevention and Management Action Plan taking into account the context of the new intervention communities of the additional financing, including the risks and needs of internally displaced persons and refugees.</p>	<p>As with the parent project, site-specific instruments shall be prepared, disclosed, consulted upon, and adopted prior to the start of any activity requiring the development of a specific E&S instrument and shall be thereafter implemented throughout the Project implementation.</p> <p>The SEA / SH Prevention and Management Action Plan of the Parent Project shall be updated, disclosed, consulted, and adopted prior to the AF Effective Date and be implemented thereafter throughout Project implementation.</p>	
1.4	<p>CONTRACTORS MANAGEMENT</p> <p>The Recipient shall continue to incorporate the relevant aspects of this ESCP, including the relevant E&S and security documents and / or plans, as well as the LMP, into the ESHS specifications of the procurement documents and contracts with contractors and Supervising Engineers, as in the parent project.</p> <p>As in the parent project, the Recipient shall continue to ensure that contractors and service providers (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 with regard to additional financing.</p>	<p>During the preparation of the procurement documents and before the signing of the contract and effective start of the relevant services or works, like the parent project.</p> <p>Implementation and maintenance of these measures throughout the Additional Financing implementation.</p> <p>Supervise contractors and supervising Engineers, throughout the Additional Financing implementation.</p>	PIU

1.5	<p>THIRD-PARTY MONITORING</p> <p><i>As in the parent project, the Recipient shall continue to mobilize, if necessary, relevant local regulatory authorities, through technical institutions involved in the Project (ANADEB, ANGE, CIPLEV / interministerial committee</i></p>	<p><i>Throughout the implementation of the additional financing</i></p>	<p><i>PIU Third party monitor</i></p>
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MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
<p><i>for the prevention and fight against violent extremism, etc.), NGOs, community organizations, etc. to complete or verify the environmental and social performance of the additional financing and the original financing.</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 Additional Financing, where appropriate, with terms of reference, qualifications, and experience acceptable to the Association.</i></p> <p><i>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>1.6 TECHNICAL ASSISTANCE</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 implementation of the original and additional financing</i></p>	<p><i>PIU</i></p>
<p>1.7 CONTINGENT EMERGENCY RESPONSE COMPONENT (CERC)</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,</i></p>	<p><i>a) The preparation and adoption of the CERC manual and, the standalone CERC-ESMF in a form, and substance acceptable to the Association is a</i></p>	<p><i>PIU</i></p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
	<p><i>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&S instruments that may be required for activities under the Contingent Emergency Response Component (CERC) of the Project, in accordance with the CERC Manual and, CERC-ESMF and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.</i></p>	<p><i>withdrawal condition under section III.B of Schedule 2 of the Financing Agreement for the Project.</i></p> <p><i>b) Submit the required E&S instrument to the Association's prior review and approval and adopt it prior to carrying out the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout the Project implementation.</i></p>	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p><i>The Labor Management Procedures (LMP) prepared for the Parent Project (including, inter alia, the prohibition of SEA / SH, child labor, and forced labor) shall be updated to take into account the discrimination or exclusion of internally displaced persons and refugees in accordance with the requirements of ESS2 and in a manner acceptable to the Association.</i></p>	<p><i>The LMP developed and adopted on February 5, 2022 shall be updated, disclosed, consulted and adopted prior to the AF Effective Date and be implemented throughout the Project implementation</i></p>	PIU
2.2	<p>ADDITIONAL FINANCING WORKERS' GRIEVANCE MECHANISM</p> <p><i>The Grievance Mechanism (GM) developed for Project workers in the LMP document of the parent project, shall be updated to take into account, in addition to SEA / SH, specificities relating to internally displaced persons and refugees, and to new intervention communities where additional financing activities take place, as described in the LMP, in accordance with the provisions of the ESS 2 and the applicable national legislation.</i></p> <p><i>The Recipient shall ensure that workers who use this GM are not subjected to any form of discrimination or retaliation from employers.</i></p>	<p><i>The GM established, and operationalized under the Parent Project shall be updated, disclosed, consulted and adopted prior to the AF Effective Date, and shall be maintained throughout the implementation of the Additional Financing of the Project.</i></p>	PIU
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES:</p> <p><i>The Recipient shall update and implement the occupational health and safety (OHS) measures specified in the</i></p>	<p><i>The final OHS plan shall be established before the start of the large- and small-scale construction works. These measures shall be maintained throughout the implementation</i></p>	PIU

		<i>of the Project.</i>	
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
	<p>parent project 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.</p>		
2.4	<p>EMERGENCY PREPAREDNESS AND RESPONSES</p> <p>The Recipient shall adopt and implement emergency preparedness and response measures and reflect those measures in the Additional Financing ESMF to be updated and the ESIA / ESMPs.</p> <p>The Recipient shall ensure that the Project Contractors prepare, adopt, and implement an emergency preparedness and response plan. The emergency circumstances of each sub-project shall be identified in the ESIA reports and the 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.</p> <p>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.</p>	<p>Before the start of the large or small construction works and throughout the implementation of the Additional Financing of the Project.</p>	<ul style="list-style-type: none"> - PIU - Supervising Engineer. - Contractors and suppliers
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>POLLUTION PREVENTION AND MANAGEMENT:</p> <p>Waste and Hazardous Materials Management: The Recipient shall update, adopt, implement measures, and reflect those measures in the updated ESMF and ESIA's / ESMPs, to manage waste and hazardous materials in accordance with ESS 3 and in a manner acceptable to the Association.</p>	<p>The measures shall be adopted before the actual start of the large and small scale construction works. These measures and actions shall be maintained and implemented throughout the implementation of the Additional Financing.</p>	<p>PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
	<p><i>The Recipient shall ensure that the contractors develop, adopt, and implement a waste and hazardous materials management plan (common and specific waste) in accordance with the provision of the updated ESMF and site specific ESIA/ESMP, in a manner acceptable to the Association.</i></p> <p>Pesticides management: <i>The Recipient shall ensure that the prevention and management measures for risks and potential impacts provided for the Pest Management Plan (PMP), included in the updated ESMF, are implemented in a manner acceptable to the Association.</i></p>		
3.2	<p>RATIONAL USE OF RESOURCES: <i>The Recipient shall develop, adopt, implement rationalization measures on raw materials, energy and water use and the maintenance of its quality, and reflect those measures in the updated ESMF and ESIA/ESMPs, to manage efficient consumption of these resources in accordance with ESS3 and in a manner acceptable to the Association.</i></p>	<p><i>The measures shall be adopted before the start of large and small scale construction works and implemented and maintained throughout the Project implementation.</i></p>	PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY: <i>As in the parent Project, 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>	<p><i>Before the start of the large and small scale construction works and throughout the Project implementation of the additional financing.</i></p>	<p>- PIU -Supervising Engineer -Contractors</p>
4.2	<p>COMMUNITY HEALTH AND SAFETY: <i>The Recipient shall and shall ensure the contractors / supervising entities to, develop, adopt, and implement measures and actions to assess and manage the following additional financing-related risks and impacts, in accordance with ESS 4 requirements, taking into account the host communities of internally displaced persons and refugees and in a manner acceptable to the Association.</i></p>	<p><i>Prior to the start of the large and small scale construction works. These measures shall be maintained throughout the Project implementation.</i></p>	<p>- PIU-Supervising Engineer -Contractors</p>

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
	<p>SEA / SH Risks <i>The SEA / SH Prevention and Management Action Plan developed under the parent project shall be updated in order to take into account the risks related to the context of internally displaced persons / refugees as well as host communities in the additional financing. "These measures will aim to raise awareness, prevent and mitigate the SEA/SH risks, including, but not limited to, the development of a code of conduct for workers and the organization of trainings to sensitize the various stakeholders of the Additional Financing.</i></p> <p>Security risks <i>The Recipient shall update the security risks assessment and, thereafter, update, adopt, and implement the Security Management Plan (SMP), for the Project, to manage the risks of recurring security incidents and threats under the additional financing and taking into account the context of the new intervention communities, in accordance with the requirements of ESS 1 and ESS 4 in a manner acceptable to the Association.</i></p>	<p><i>The SEA / SH Prevention and Management Action Plan of the Parent Project shall be updated, disclosed, consulted upon, and adopted prior to the Additional Financing Effective Date and be implemented thereafter throughout Project implementation.</i></p> <p><i>The SMP of the parent Project shall be updated and adopted prior to the Additional Financing Effective Date and implemented throughout the Project implementation.</i></p> <p><i>The action plan shall be updated as necessary, according to the evolution of the security context of the additional financing sub-projects areas.</i></p>	
4.3	<p>Security Personnel: <i>The Recipient shall update, adopt, and implement a Security Management Plan (SMP), based on the Additional Financing Security Risk Assessment (SRA), taking into account the constraints and risks of the new intervention communities, and the concerns of internally displaced persons / refugees, 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 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 and impacts of engaging security personnel and implement measures</i></p>	<p><i>The SMP shall be updated and adopted prior to the AF Effective Date and implemented thereafter throughout Project implementation.</i></p> <p><i>Carry out a, b), and c), before deploying the relevant security personnel under the Project and implement throughout Project implementation.</i></p> <p><i>d) and e) as set out under actions 10.1 and 10.2 respectively. Notify the Association after receiving the concern or grievance in the timeframe specified in action B above.</i></p>	<p>- PIU - Contractors, supervising entity -Security services</p>

		<i>f) within the timeframes agreed with the Association.</i>	
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MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
<p><i>to manage these risks and impacts, (including a stand-alone security risk 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 are properly instructed and trained, prior to deployment and on a regular basis, on the use of force and proper conduct, as outlined in the parent Project Operational Manual, the ESMF, and the Security Management Plan;</i></p> <p><i>d. Ensure that the stakeholder engagement activities under the Stakeholder Engagement Plan (SEP) include a communication strategy on the involvement of security personnel in the Additional Financing;</i></p> <p><i>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 Additional Financing grievance mechanism (see action 10.2 below) and reported to the Association no later than two (2) days after being received; and</i></p> <p><i>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,</i></p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
	<p>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>		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT FRAMEWORK AND RESETTLEMENT PLANS: <i>The Resettlement Framework (RF) prepared for the Parent Project shall be updated, in accordance with ESS 5, while ensuring that women and other vulnerable individuals and groups have equal access to resettlement-related opportunities and compensation and that any risks, potentially associated with resettlement are considered in the RF, in a manner satisfactory to the Association.</i></p> <p><i>The parent project has followed a voluntary land donation approach that is carefully recorded and monitored for the various sub-projects, which will continue as part of the additional financing. Subject to prior approval of the Association, this may be acceptable if the following elements are demonstrated consistent with ESS5: (a) the potential donor or donors have been appropriately informed and consulted about the project and the choices available to them; (b) potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation; (c) the amount of land being donated is minor and will not reduce the donor's remaining land area below that required to maintain the donor's livelihood at current levels; (d) no household relocation is involved; (e) the donor is expected to benefit directly from the project; and (f) for community or collective land, donation can only occur with the consent of individuals using or occupying the land. The Recipient shall maintain a transparent record of all consultations and agreements reached.</i></p> <p><i>Where appropriate, the Recipient shall 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 shall be approved by the</i></p>	<p><i>The RF that has been prepared, disclosed, consulted, and adopted on December 14, 2021 shall be updated, disclosed, consulted and adopted prior to the AF Effective Date, and be implemented thereafter throughout the Project implementation.</i></p> <p><i>Prepare, disclose, consult, adopt, and then implement the respective RP, before the Effective Date of the Additional Financing, including ensuring that before taking possession of the land and related assets, full compensation has been provided and as applicable displaced people have been resettled and moving allowances have been provided.</i></p>	<p>- PIU</p> <p>- The Expropriation Commission (COMEX) housed within the Ministry of Economy and Finance.</p>

	<i>Association and disclosed nationally.</i>		
5.2	<p>MONITORING AND REPORTING: <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 relevant works.</i></p>	<i>Prior to the start of the large and small scale construction works.</i>	<ul style="list-style-type: none"> - PIU -Implementing agency -NGO
5.3	<p>GRIEVANCE MECHANISM (GM): <i>The GM of the Parent Project will be expanded to include the new geographical areas of the AF. The current Project GM is sensitive to SEA/SH, including complaints and comments on involuntary resettlement associated with the project may also be addressed. This updated GM shall be operational and accessible to all those affected by land acquisition and resettlement activities, including internally displaced persons and refugees.</i></p>	<i>Before the start of RP implementation</i>	<ul style="list-style-type: none"> - PIU -Implementing agency -NGO

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS: <i>The Recipient shall implement the 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&S instruments shall be submitted to the Association for approval before launching procurement documents and contracts with contractors and supervising entities.</i></p>	<i>Prior to the start of the large and small scale construction works.</i>	PIU
ESS 7: INDIGENOUS PEOPLES/ SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
<i>Not currently applicable to the Project. Should the presence of indigenous communities be confirmed through further screening during implementation, the necessary assessments, consultations and instruments shall be undertaken as per the requirements of ESS7.</i>			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS : <i>The Recipient shall develop, adopt, and implement a management plan for the cultural heritage that may be affected by the Additional Financing, if any, as well as procedures relating to chance finds as described in the parent project ESMF. Clauses on these “chance finds” shall be included in all works contracts, even in cases where the probability is very low. 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.</i></p> <p><i>The ESMF outlines a procedure in the event of the “chance finds” of cultural remains, in accordance with ESS8, national legislation and the practices of the ministry responsible for culture. Likewise, the ESIA / ESMP to be prepared shall include such a section on cultural heritage. These measures shall be consistent with ESS 8 requirements.</i></p>	<i>Before the start and throughout the large and small scale construction works.</i>	PIU
ESS 9: FINANCIAL INTERMEDIARIES (IF)			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
Not applicable to the Project			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>PREPARATION AND IMPLEMENTATION OF THE STAKEHOLDER ENGAGEMENT PLAN: The Stakeholder Engagement Plan (SEP) developed and implemented under the parent project, shall be updated following the additional consultations that will be organized in the intervention areas of the additional financing and with internally displaced persons/refugees, and including measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult in a culturally appropriate way, free of manipulation, interference, coercion, discrimination and intimidation, all in accordance with ESS 10 and in a manner acceptable to the Association.</p>	<p>The SEP has been updated and disclosed on March 11th, 2024.</p> <p>The SEP shall be implemented throughout the Project implementation.</p>	PIU
10.2	<p>PROJECT GRIEVANCE MECHANISM (GM): The Grievance Mechanism (GM) developed and implemented in the parent project implementation shall be extended to take into account the contexts of the Additional Financing communities, including the concerns and grievances of the internally displaced persons and refugees; it shall be accessible to receive and facilitate the resolution of concerns and grievances related to the entire project, promptly and effectively, in a transparent manner, 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 ESS 10.</p> <p>The updated 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 shall ensure a referral system to provide assistance to survivors as required, through identified GBV service providers in the Project area, namely the social action and women empowerment regional antennas as well as the NGO Communication for a sustainable world.</p> <p>The GM shall be supported by a communication plan to ensure</p>	<p>The updated GM shall be operational prior to the AF Effective Date.</p> <p>The updated GM will be maintained and will remain operational throughout the Project implementation</p>	<p>- PIU</p> <p>-Psychosocial and legal assistance centers</p>

	<p><i>that the local populations affected (including the host communities for internally displaced persons and refugees) are aware of the existence of this mechanism and know how to file complaints. The dissemination and awareness-raising channels must take into account the languages and other constraints of these new communities and the internally displaced/refugees. The Recipient shall ensure that all intervention communities are aware of the procedures for filing and handling complaints and other remedies.</i></p>		
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MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
CAPACITY BUILDING (TRAINING):		
<p>As in the parent project, the training on environmental and social standards under the additional financing will focus, inter alia, on:</p> <ul style="list-style-type: none"> -ESS 1: Assessment and management of environmental and social risks and impacts, including the risks and impacts related to internally displaced persons/refugees - ESS 2: Labor and working conditions and the Labor Management Procedures (LMP) - ESS 3: Resource efficiency and Pollution Prevention and Management -ESS 4: Community health and safety and security management plan (SMP) ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources ESS 8: Cultural heritage ESS 10: Stakeholder engagement and information disclosure and the Stakeholder Engagement Plan (SEP) <p>The training shall target the following points:</p> <ul style="list-style-type: none"> -Project Steering Committee / Regional Coordination Committee (RCC) -PIU (social specialist, environmental specialist, safety specialist, procurement specialist) - Environmental and social focal points at the local level <p>-NGOs working in the environmental and social fields in the Project areas</p>	<p>The trainings started under the project will be continued throughout the Project implementation</p>	<p>PIU with the support of other consultants/Training Center hired by the Project if necessary.</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
<ul style="list-style-type: none"> - Relevant technical entities - ANGE - Relevant local authorities 		
<p>Occupational health and safety training: <i>As in the parent project, contractors and supervising entities shall train all workers involved in the Additional Financing 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.</i></p> <p><i>Contractors shall also ensure that the workers of their subcontractors are trained on the same subjects.</i></p> <p><i>The training shall target the following points:</i></p> <ul style="list-style-type: none"> -Contractors - Contractor’s workers (including any subcontractors) -Community workers - Supervising entities - PIU - NGO <p>Information, Education and Communication (IEC) <i>Raise awareness among contractors' workers, including subcontractors' workers, community workers, and supervising entity mobilized on the sites to the environmental and social standards as well as on respect for anti-COVID-19 barrier gestures</i></p>	<p><i>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.</i></p> <p><i>Throughout the Project implementation</i></p>	<p><i>PIU</i></p>
<p>Training on labor and working conditions</p> <ul style="list-style-type: none"> -Conditions of employment under national labor law - Code of conduct for suppliers / service providers and subcontractors; - workers' organizations; - Rules on child labor and minimum working age; - Workers' rights; -Worker complaints and SEA / SH complaints <p><i>Discrimination and harassment (SEA / SH) / incidence at work.</i></p> <p><i>The training shall target the following stakeholders:</i></p>	<p><i>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.</i></p>	<p><i>PIU</i></p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
<ul style="list-style-type: none"> - Contractor's workers (including any subcontractors) -Community workers - Supervising Engineers/Consulting ; -NGOs working in the social field in the area of the additional financing. 		
<p>Training on environmental and social management This training should provide knowledge about :</p> <ul style="list-style-type: none"> - the process of selection and environmental and social classification of sub-projects ; - the procedures for organizing and carrying out the ESIA and the RP; - environmental policies, procedures and legislation in Togo; - Implementation monitoring process of the ESMP and the RP <p>The training shall target the following stakeholders:</p> <ul style="list-style-type: none"> -PIU (social specialist, environmental specialist, safety specialist, procurement specialist) - Central and local technical structures involved in the additional financing ; - ANGE 	<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>Training on grievance mechanism The training shall focus on the following modules:</p> <ul style="list-style-type: none"> - Registration and processing procedure; - Complaints' resolution procedure; - Documentation and handling of complaints ; - Use of the procedure by the various stakeholders; - SEA / SH complaints. <p>The training shall target the following stakeholders:</p> <ul style="list-style-type: none"> -PIU (social specialist, environmental specialist, safety specialist, procurement specialist) -Local or regional committees for monitoring or managing complaints. -Technical structures - ANGE - Relevant local authorities. -NGOs working in the social field in the area of the additional financing. 	<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>
<p>EAS/HS Risk Training <ul style="list-style-type: none"> - Awareness and measures to prevent and mitigate the risks of SEA/SH; </p>	<p>Prior to the start of employment of newly recruited workers and those already working, training would be provided quarterly</p>	<p>PIU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
<p>The themes, activities and target audiences will be defined in the updated SEA/SH action plan;</p> <ul style="list-style-type: none"> -Dissemination of the updated SEA/SA action plan (activities, target groups) ; -Handling of SEA/SH complaints <p>The training shall target the following stakeholders:</p> <ul style="list-style-type: none"> -PIU (environmental and social specialists, security specialist, procurement specialist, monitoring and evaluation specialist), -Central and local technical structures, - ANGE - Relevant local authorities. -NGO 	<p>to ensure that all staff, actors and stakeholders involved are trained.</p>	
<p>Training on risks and management in the work phase targeting workers</p> <ul style="list-style-type: none"> - SEA/SH, child labor and forced labor; - GM - including the SEA/SH related grievance mechanism - Compliance with the code of conduct clearly mentioning the prohibition of SEA / SH and the penalties in the event of misconduct, etc. - Pollution and damage during the Project works, -Occupational Health and Safety. 	<p>Subcontractor workers</p> <p>Before the start of work and organize regular refresher sessions</p>	<ul style="list-style-type: none"> - PIU -Contractors
<p>Information / awareness on potential environmental and social risks targeting local populations / communities covered by the Additional Financing: 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 Project implementation.</p>	<ul style="list-style-type: none"> - PIU -Contractors - Supervising engineer / supervisory entity