



RÉPUBLIQUE TOGOLAISE

MINISTRY OF VILLAGE WATER AND HYDROLOGIE

**Togo Urban Water Security (TUWS) (P176902)
DRAFT**

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

November 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

- 1.** The Government of the Togolese Republic (the "Borrower") will implement the Togo Urban Water Security Project (P176902) (the "Project"), with the involvement of the Ministry of Water, Rural Equipment and Village Hydraulics (MWREVH), as set out in the Financing Agreement. The International Development Association (the "Association") has agreed to provide financing (P176902) for the Project, as set out in the referred agreement.
- 2.** The Borrower 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. This ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meaning ascribed to them in the referred agreement.
- 3.** Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower 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 agreement by the Association.
- 4.** As agreed by the Association and the Borrower, this ESCP will be revised from time to time if necessary, during the implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Borrower through the Ministry of Water, Rural Equipment and Village Hydraulics and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed by the Association and the Borrower's Minister of the Ministry of Water, Rural Equipment and Village Hydraulics. The Borrower shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A.	<p>REGULAR REPORTS: Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	<p>Quarterly reports to the Association, throughout Project implementation Project commencing after the Effectiveness Date. Submit each report to the Association no later than 15 days after the end of each reporting period</p>	Project Management Unit (PMU)
B.	<p>INCIDENTS AND ACCIDENTS: Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), any other incident or accident that may entail groundwater and soil pollution, impacts on health and safety of local communities, and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association.</p>	PMU
C.	<p>CONTRACTORS' MONTHLY REPORTS Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with</p>	<p>Submit the monthly reports to the Association upon request.</p>	<p>PMU Contractors (with their own budget) Supervising engineers (with their own budget)</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	the metrics specified in the respective bidding documents and contracts, and submit such reports to the Association.		
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE Establish and maintain a Project Management Unit (PMU) with qualified staff and resources to support management of ESHS risks and impacts of the Project, including an a social specialist and an environmental specialist.</p>	Establish and maintain a PMU as set out in the Financing Agreement. Hire or appoint the social specialist and environmental specialist prior to Project Effectiveness Date, and thereafter maintain these positions throughout Project implementation.	Ministry of Water, Rural Equipment and Village Hydraulics (MWREVH) ANADEB PMU
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS Adopt, publish and implement the ESMF in accordance with the relevant ESS including ES clauses to be included in tender documents and works contracts in a manner satisfactory to the Association. The ESMF should also include an SEA/SH/GBV/VAC action plan.</p> <p>Adopt, publish and implement the RPF of the project in a manner satisfactory to the Association.</p> <p>Adopt, publish and implement the LMP in a manner satisfactory to the Association.</p> <p>Adopt, publish, implement and maintain the SEP and its project GRM in a manner satisfactory to the Association.</p> <p>For each sub-project, adopt, publish, implement and monitor the performance of the following ES risk assessment and management tools and instruments, in accordance with the ESS and in a manner acceptable to the Association:</p> <ul style="list-style-type: none"> - Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plans (ESMP) specific to Project Parts 1, 2.1, 3.1 and 3.3 as set out in the ESMF. 	<p>The ESMF is adopted and published prior to Project appraisal.</p> <p>The RPF is adopted and published prior to Board approval.</p> <p>The LMP is developed, validated and published prior to Board approval.</p> <p>The SEP is adopted and published prior to Board approval and updated no later than one year after the Effectiveness Date of the Project.</p> <p>The implementation of these plans and their actions are carried out throughout the implementation of the Project.</p> <p>Sub-project specific ESIA/ESMP shall be adopted and published and validated by the PMU, the Association and national agencies prior to issuing the tender documents. They must then be implemented throughout the implementation of the Project.</p>	PMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.3	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.	As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation.	PMU
1.4	TECHNICAL ASSISTANCE Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project, including, inter alia, ESIA and ESMPs, are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.	Throughout Project implementation	PMU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.	Adopt the LMP prior to Project Appraisal, and thereafter implement the LMP throughout Project implementation.	PMU
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation	PMU Contractors (with their own budget) Supervising engineers (with their own budget)
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Adopt and implement measures to manage waste and hazardous materials in accordance with ESS 3 and in a manner acceptable to the Association and reflect these measures in the ESMF and sub-project specific ESIAs/ESMPs. These measures should include methods for managing and disposing of sludge from wastewater treatment plants and the management of drinking water treatment chemicals.</p> <p>The Borrower shall ensure that the ESHS specifications of procurement documents and contracts with contractors and engineers supervising the works require that a waste and hazardous materials management and disposal plan be implemented in accordance with the provisions of the ESMF and sub-project specific ESIAs/ESMPs, in a manner acceptable to the Association.</p>	<p>Adopt and publish the ESMF prior to Project appraisal, and thereafter implement the LMP throughout Project implementation.</p> <p>Incorporate ESHS specifications into procurement documents prior to any procurement activity.</p> <p>Adopt and publish sub-project specific ESIAs/ESMPs according to the schedule set out in Section 1.2.</p> <p>These measures will be maintained and carried out throughout the implementation of the Project.</p>	<p>PMU Contractors (with their own budget) Supervising engineers (with their own budget)</p>
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Adopt and implement measures to rationalize the use of raw materials, energy and water and the maintenance of its quality, and reflect these measures in the Project ESMF and the ESIAs/ESMPs of the Sub-Projects in accordance with ESS 3 and in a manner acceptable to the Association.</p>	<p>Adopt and publish the ESMF prior to Project appraisal and thereafter implement the ESMF throughout Project implementation.</p> <p>Adopt and publish sub-project specific ESIAs/ESMPs according to the schedule set out in Section 1.2.</p> <p>These measures will be maintained and carried out throughout the implementation of the Project.</p>	<p>PMU</p>
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Ensure that contractors/engineers supervising the works develop, adopt and implement measures to assess and manage traffic and road safety risks through their C-ESMP (including, among others, a traffic and road safety plan</p>	<p>Incorporate traffic plans into sub-project specific ESIAs/ESMPs and C-ESMPs prior to the commencement of work.</p>	<p>PMU Contractors (with their own budget) Supervising engineers (with their own budget)</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	and a traffic plan for construction machinery and diversion lanes), in accordance with the requirements of ESS 4 and in a manner acceptable to the Association.	These measures will be maintained and carried out throughout the implementation of the Project.	
4.2	<p>COMMUNITY HEALTH AND SAFETY Ensure that the contractors/engineers supervising the works develop, adopt and implement measures and actions to assess and manage the risks and impacts on communities related to the sub-projects through their C-ESMP, in accordance with the requirements of ESS 4 and in a manner acceptable to the Association.</p> <p>Risks related to the spread of COVID-19 The Borrower shall develop, adopt and implement measures to prevent and manage risks related to the spread of COVID-19 in the ESMF.</p> <p>Risks associated with the spread of STI/HIV/AIDS The Borrower shall develop, adopt and implement measures to prevent and manage the risks related to the spread of STI/HIV/AIDS as set out in the ESMF.</p>	<p>Validate the C-ESMP prior to the commencement of work by contractors.</p> <p>Adopt and publish the ESMF prior to Project appraisal and thereafter implement the ESMF throughout Project implementation.</p>	<p>PMU Contractors (with their own budget) Supervising engineers (with their own budget)</p>
4.3	<p>SEA AND SH RISKS Adopt and implement a SEA/SH Action Plan as set out in the ESMF, to assess and manage the risks of SEA and SH.</p>	Adopt and publish the ESMF prior to Project appraisal and thereafter implement the ESMF throughout Project implementation.	<p>PMU Contractors (with their own budget) Supervising engineers (with their own budget)</p>
4.4	<p>SECURITY MANAGEMENT: Assess and implement measures set out in the ESMF to manage the safety risks of the Project, including the risks associated with the use of security officers to protect workers, sites, assets and activities of the Project, guided by the principles of proportionality and good international industry practice (GIIP) and by applicable law, in relation to screening, hiring, rules of conduct, training, equipping, and monitoring of these personnel.</p>	Adopt and publish the ESMF prior to Project appraisal and thereafter implement the ESMF throughout Project implementation.	<p>PMU Contractors (with their own budget) Supervising engineers (with their own budget)</p>

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	In the event of a particular risk in one of the sub-projects, the Borrower shall prepare, adopt and implement a component-specific security personnel management plan in accordance with the requirements of ESS 4, in a manner acceptable to the Association.		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT POLICY FRAMEWORK</p> <p>Adopt, publish and implement a RPF for the Project, in accordance with ESS 5, while ensuring that women and other vulnerable persons and groups have equal access to resettlement-related opportunities and compensations and that all risks potentially associated with resettlement are reflected in the RPF, in a manner satisfactory to the Association.</p>	Adopt the RPF prior to Project approval and thereafter implement the RPF throughout Project implementation.	PMU
5.2	<p>RESETTLEMENT PLANS</p> <p>Adopt and implement a resettlement action plan (RAP) for each activity under the Project for which the RPF requires such RAP, as set out in the RPF, and consistent with ESS5 and with national regulations.</p> <p>The Borrower, through the Ministry of Economy and Finance, shall provide a budget for compensation and assistance measures to affected persons in the event of physical and/or economic resettlement.</p>	Adopt and implement the respective RAP, 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.	PMU Ministry of Economy and Finance COMEX
5.3	<p>GRIEVANCE MECHANISM</p> <p>Ensure that complaints about physical and/or economic resettlement associated with the Project can also be addressed through the GRM. This GRM must be operational and disclosed in an inclusive and accessible manner to all persons affected by physical and/or economic relocation prior to the implementation of the RAP.</p>	Integrate the Project GRM into the RPF according to the schedule outlined in section 1.2.	PMU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
6.1	<p>RISKS AND IMPACTS ON BIODIVERSITY</p> <p>Adopt and implement the biodiversity management measures set out in the ESMF and the site specific ESIA's in accordance with ESS6 requirements and in a manner acceptable to the Association.</p>	Adopt and publish the ESMF prior to Project appraisal and thereafter implement the ESMF throughout Project implementation.	PMU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
<i>Not applicable</i>			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS</p> <p>Describe and implement the chance finds procedures, as part of the ESMF of the Project. Clauses on this procedure must be included in all works contracts, even in cases where the probability of chance finds is very low.</p> <p>Similarly, ESIA's/ESMP's shall assess local cultural heritage and the presence of possible heritage sites and implement the chance finds procedures. These measures shall comply with the requirements of ESS 8.</p>	<p>Adopt and publish the ESMF prior to Project appraisal and thereafter implement the ESMF throughout Project implementation.</p> <p>Adopt and publish sub-project specific ESIA's/ESMP's according to the schedule set out in Section 1.2.</p>	PMU
ESS 9: FINANCIAL INTERMEDIARIES			
<i>Not applicable</i>			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION			
10.1	<p>PREPARATION AND IMPLEMENTATION OF THE STAKEHOLDER ENGAGEMENT PLAN (SEP):</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include 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.</p>	<p>Adopt the SEP prior to Project appraisal, and update the SEP no later than one year after the Effectiveness Date of the Project and thereafter implement the SEP throughout Project implementation</p> <p>Adopt sub-project specific ESIA's/ESMP's and RAPs according to the schedule set out in Section 1.2.</p>	PMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH/VAC complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner. The grievance mechanism will also include specific channels and processes to deal with worker complaints under ESS 2 (see section 2.2) and relocation complaints under ESS 5 (see section 5.3).</p>	<p>Establish the grievance mechanism prior to the Effectiveness Date, and thereafter maintain and operate the mechanism throughout Project implementation.</p>	<p>PMU</p>
CAPACITY SUPPORT			
RC1	<p>Training on the ESS</p> <p>This training will cover the requirements of the World Bank's Environmental and Social Framework:</p> <ul style="list-style-type: none"> - ESS 1: Assessment and Management of Environmental and Social Risks and Impacts - ESS 2: Labor and Working Conditions (and the PGM document) - ESS 3: Resource Efficiency and Pollution Prevention and Management - ESS 4: Community Health and Safety - ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (and RPF) - ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources - ESS 8: Cultural Heritage 	<p>Training no later than 3 month after Effectiveness of the Project.</p> <p>During the recruitment of PMU ES specialists and repeated once a year throughout the implementation of the Project.</p>	<p>Training provided by the Association</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>- ESS 10: Stakeholder Engagement and Information Disclosure (and the PMPP).</p> <p>In addition, apart from the ESS, the training will also cover legal operational policy OP/BP 7.50 'Projects in international waters', as it applies to the project.</p> <p>The training will target the following stakeholders:</p> <ul style="list-style-type: none"> - PMU - MWREVH 		
RC2	<p>Occupational Health and Safety (OHS) Training</p> <p>The PMU, contractors and engineers supervising the works must train all workers involved in the activities of the project, including security personnel, on OHS, first aid equipment, emergency preparedness and response measures. The training will also cover the respect of anti-COVID-19 measures and the prevention of STIs/HIV/AIDS.</p> <p>The PMU, contractors and supervising engineers must also ensure that the workers of their subcontractors or consultants are trained on the same topics.</p> <p>The training will target the following stakeholders:</p> <ul style="list-style-type: none"> -Contractors - Workers of contractors (including subcontractors) - Community workers - Supervision engineers - PMU 	Before the start of employment of newly recruited workers or activities for existing employers. Training will be provided every 6 months throughout the implementation of the Project.	PMU Contractors (with their own budget) Supervising engineers (with their own budget)
RC3	<p>Training on employment and working conditions</p> <p>This training will cover the following topics:</p> <ul style="list-style-type: none"> - Conditions of employment under national labor law. - LMP and GRM for workers. - Code of conduct for workers. - Rules on child labor and minimum working age. - Workers' rights. 	Before the start of employment of newly recruited workers or activities for existing employees. Training will be provided every 6 months throughout the implementation of the Project.	PMU Contractors (with their own budget) Supervising engineers (with their own budget)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> - Worker complaints and complaints related to SEA/SH/GBV/VAC. <p>The training will target the following actors:</p> <ul style="list-style-type: none"> - PMU. -Workers of contractors (including subcontractors) -Community workers. - Supervising engineers. -NGOs working in the social field in the Project area. 		
RC4	<p>Environmental and Social Management Training: This training will cover the following topics:</p> <ul style="list-style-type: none"> - The process of selection and classification of sub-projects - The modalities for the organization and implementation of ESIA and RAPS. - Environmental policies, procedures and legislation in Togo. - RPF and ESMF and monitoring of the implementation of RAPS and ESIA/ESMPs and C-ESMPs. <p>The training will target the following actors:</p> <ul style="list-style-type: none"> - PMU - Central and decentralized technical services involved in the Project - MWREVA 	Training no later than 3 month after Effectiveness of the Project	PMU
RC5	<p>Training on the Grievance Redress Mechanism (GRM): The training will cover the following modules:</p> <ul style="list-style-type: none"> - Procedure for registering, processing and resolving complaints. - Documentation and handling of complaints. - Use of the GRM by the different stakeholders. - Complaints related to SEA/SH/GBV/VAC. <p>The training will target the following actors:</p> <ul style="list-style-type: none"> - PMU -Local Complaints Management Committees 	Training no later than 3 month after Effectiveness of the Project	PMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> - Workers' complaint management committees of contractors - Central and decentralized technical services involved in the Project - NGOs involved in the Project. 		
RC6	<p>Training on SEA/SH/ VAC Risk: This training will cover the following topics:</p> <ul style="list-style-type: none"> - Awareness-raising and risk prevention and mitigation measures for SEA/SH /VAC. -Handling of SEA/SH/ VAC complaints. <p>The training will target the following actors:</p> <ul style="list-style-type: none"> - PMU - Central and decentralized technical services involved in the Project - GBV service providers 	Training no later than 3 month after Effectiveness of the Project	PMU