

INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPMENT
INTERNATIONAL DEVELOPMENT ASSOCIATION

PROGRESS REPORT No. 1
ON THE IMPLEMENTATION OF MANAGEMENT'S ACTION PLAN IN RESPONSE TO
THE INSPECTION PANEL INVESTIGATION REPORT (REPORT # 181161-AFR) ON THE

TOGO
WEST AFRICA COASTAL AREAS RESILIENCE
INVESTMENT PROJECT (P162337), ADDITIONAL FINANCING (P176313) AND
GLOBAL ENVIRONMENT FACILITY (GEF) (P092289)

SEPTEMBER 30, 2024

TOGO
WEST AFRICA COASTAL AREAS RESILIENCE INVESTMENT
PROJECT (P162337), ADDITIONAL FINANCING (P176313) AND
GLOBAL ENVIRONMENT FACILITY (GEF) (P092289)
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Implementation of Management Action Plan

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I. INTRODUCTION

1. This is the first Progress Report to the Board of Executive Directors (the Board) on the implementation of the Management Action Plan (MAP) in response to the Inspection Panel Investigation Report No. 181161-AFR on the Republic of Togo: West Africa Coastal Areas Resilience Investment Project (P162337), Additional Financing (P176313) and Global Environment Facility (GEF) (P092289).

Project

2. The Project Development Objective (PDO) is to strengthen the resilience of targeted communities and areas in coastal Western Africa. The Project aims in that respect to enhance the absorptive, adaptive, and transformative capacities of six beneficiary countries (Côte d’Ivoire, Benin, Mauritania, Senegal, São Tomé and Príncipe, and Togo) and to reduce the shared risks, either natural or man-made, to which they are exposed, and which are similar for all or most of the countries or transboundary in nature.

Current Status of the Project

3. The Project is currently rated overall as Moderately Satisfactory. This includes progress towards the PDO and overall implementation in all countries. Per the February 2024 Implementation Status & Results Report (ISR), the Project recorded progress in achieving the expected results at the country and regional levels. Furthermore, overall Project disbursement stands at 74 percent and the Project is on track to deliver its expected outcomes by Project closing on December 30, 2026. In summary, across the six countries and in the regional integration activities by the West African Economic and Monetary Union (WAEMU), the status is as follows:

- *Component 1 – Regional Integration (regional institutions managed under WAEMU):* Progress has been made in: (i) validation of the Regional Strategic Action Plan for Investments (PARSI); (ii) training and awareness-raising of parliamentarians and local elected officials on the issues in the coastal area and associated legislative challenges; (iii) operationalization of the West African Coastal Regional Observatory (ORLOA); (iv) development of the network under the West African Coastal Regional Alert Network (RESALOA); and (v) validation of the methodology for the “2024 State of West Africa Coast Report.” The Regional Steering Committee (RSC), co-convened by WAEMU and the countries on a rotating basis, has met twice a year to confirm that the regional integration workplan is operating efficiently and to set priorities for emerging opportunities.
- *Component 2 – Strengthening the Policy and Institutional Framework (summary across the six countries):* Progress on developing policy instruments and capacity building of institutions for national (ANAGIL in Côte d’Ivoire, ANGIL in Senegal) and regional (Senegal and Mauritania Joint Committee) integration on coastal management is advancing. The Benin-Togo Joint Transboundary Committee is working on adding a scientific segment to the committee to focus on cross-national shared ecosystems. Reasonable progress has been achieved in the development of coastal zone development and management plans. Coastal observation and early warning systems have advanced in all six countries as well as at the regional level.
- *Component 3 – Strengthening Physical and Social Investments (summary across the six countries):* In all countries, technical, environmental and social impact studies of major physical investment works have been launched and/or completed. Cross-border works in Benin-Togo shoreline protection were completed in September 2023 (see next paragraph for detail). The contracts for works in Grand-Lahou, Côte d’Ivoire and the sites in Senegal have been signed. Community income generating sub-projects have so far benefitted 8,598 people in Togo and Benin. In addition,

around 9,260 full-time jobs have been created across WACA countries. In São Tomé and Príncipe, 2.3 km of coastal protection measures have reduced exposure of 1,618 households to flooding. In Mauritania, 3 km of the sand dune barrier protecting the capital Nouakchott from coastal flooding have been restored.

- *Component 4 – National Coordination (summary across the six countries):* The National Steering Committees (NSC) and National Technical Committees are operating efficiently and setting priorities for emerging opportunities. National Project Implementation Units (PIUs) have experienced a high staff turnover in Côte d’Ivoire, Benin, and Senegal. The Regional Implementation Support Unit (RISU) is supporting countries to ensure continuity.

4. The Project in Togo is currently rated as Moderately Satisfactory. Project implementation progress and progress towards achievement of the PDO is Moderately Satisfactory. The transboundary coastal protection works under a shared contract with Benin have been completed. The positive effect of these regional integration works between Togo and Benin, covering 18 kilometers in Togo west of the border (from Agbodrafo to Aného) and 24 kilometers in Benin east of the border (from Heliconia to Gbekon) is evident. The completed coastal protection works in Togo include the construction of a series of groynes with sand replenishment between them, the restoration of a wave-breaker, establishment of a coastal dune, and in Benin a massive beach replenishment through the development of a “sand motor” of 6 million cubic meters, and filling of an abandoned lagoon arm. As a result, the coastal protection works in the 42-km cross-border area have reduced the exposure of 27,430 households to coastal erosion and flooding (9,850 in Togo and 17,580 in Benin, or more than 160,000 people, assuming an average of 6 persons per household). In addition, 27,210 ha of natural habitat in the coastal zone have been restored (27,000 ha in Togo and 210 ha in Benin).

5. Social sub-projects have so far benefitted 4,177 people (625 in Togo and 3,552 in Benin) of which 75 percent are women, and 4,602 full-time jobs have been created (1,050 in Togo and 3,552 in Benin). In addition, key economic infrastructure, including the coastal road and the bridge across the Mono River, are at reduced risk from flooding hazards.

6. In the segment from Gbodjomé to Agbodrafo, groynes and replenishment were planned to be financed by the Green Climate Fund (GCF), but this did not happen due to a change in investment priorities of the GCF, which was communicated to the Bank on December 9, 2020. Instead, the Project installed the temporary emergency coastal protection. Meanwhile, the Bank mobilized financing for the groynes and sand replenishment from the Agence Française de Développement (French development agency) and Invest International, for which joint co-financing agreements were signed September 15, 2023, and May 3, 2024, respectively. The accompanying Project restructuring was approved by the Bank on June 14, 2024, and the amendment to the IDA legal agreement was countersigned by the Government of Togo on July 26, 2024.

Summary of Panel Process

7. ***Request for Inspection.*** On September 7, 2021, the Inspection Panel (IPN or Panel) registered a [Request for Inspection](#) and issued a [Notice of Registration](#) for IPN Request RQ21/03 (the Request), of the IDA-financed Republic of Togo: West Africa Coastal Areas Resilience Investment Project (P162337), Additional Financing (P176313) and Global Environment Facility (P092289). The Requesters alleged that approximately 1,000 households along the coast would be affected by the Project, including fishers, residents, and property owners. They claimed that the Project would limit beach access to a small strip of land, reducing the space to keep fishing boats. They feared that artisanal fishing and livelihoods would be adversely affected by the Project. Further, they were concerned with involuntary resettlement allegedly attributed to the Project and noted that community members had been asked to vacate their premises. Management provided its [Response to the Request](#) on October 6, 2021. In its [Eligibility Report](#) to the Board

on June 8, 2022, the Panel found the Request eligible for inspection and recommended that the Executive Directors authorize an investigation.

8. ***Investigation.*** The Board approved an investigation into the allegations of harm arising from instances of noncompliance by the Bank with its operational policies and procedures. On April 20, 2023, the Panel issued its [Investigation Report](#), to which [Management responded](#) on June 2, 2023, with its proposed Management Action Plan (MAP). On September 14, 2023, the [Bank's Board considered both reports](#) and approved the MAP.

II. PROGRESS OF MANAGEMENT ACTION PLAN IMPLEMENTATION

9. The table below provides an overview of the status of implementation of the MAP.

MAP Implementation Status

Issue/Finding	Borrower Actions		Bank Actions	
	Description	Status	Description	Status
<p>1. Environmental and Social Screening for the Emergency Works</p> <p>Bank classification of the Emergency Works as Category C, which requires no further EA action, led to a lack of meaningful consultation and the absence of an appropriate environmental and social impact assessment of these Works. The Panel finds this classification is in non-compliance with OP 4.01, paragraph 8. As a result, the Panel finds Management failed to ensure the Emergency Works are environmentally sound and sustainable, which is in non-compliance with OP 4.01, paragraph 1.</p>	<p>Management of pipes</p> <p>The PIU will contract a company to monitor pipe integrity and signage/lighting beacons; and manage the repair, removal and cleanup of broken and dislocated pipes in the area of the Emergency Works.</p> <p><i>Date (for completion): Contractor for these works will be hired by August 31, 2023.</i></p>	<p>Completed.</p> <p>The contract was signed on November 24, 2023.</p>	<p>The Bank will review the proposed Scope of Works for this new contract and provide feedback and recommendations as may be needed.</p> <p><i>Date: June 15, 2023.</i></p>	<p>Completed.</p> <p>The Bank reviewed the scope of work and provided feedback to the PIU on May 30, 2023.</p>
	<p>Monitors</p> <p>The PIU will also hire community members as third-party monitors that will assist in the monitoring, location and reporting of problems with broken or dislocated pipes.</p> <p><i>Date (for completion): July 30, 2023.</i></p>	<p>Completed.</p> <p>The contracts were signed on May 8, 2023. The contracts were renewed on February 1, 2024.</p>	<p>The Bank will review the proposed Terms of Reference (ToRs) for the third-party monitors and provide feedback and recommendations as may be needed.</p> <p><i>Date (for completion): June 30, 2023.</i></p>	<p>Completed.</p> <p>The Bank reviewed the ToRs, which were then updated by the PIU. The ToRs were reviewed again by the Bank, on January 26, 2024.</p>
<p>2. Construction of the Emergency Works and Working Conditions</p> <p>The Panel finds that the working conditions for the construction of the Emergency Works lacked adequate human health and safety considerations. This is in non-compliance with OP 4.01, paragraph 3.</p>	<p>Work accidents</p> <p>The PIU will advise communities that the grievance redress mechanism (GRM) will remain available to receive claims from former workers involved in the construction of the Emergency Works who hold any claims from work injuries resulting from these works and that such claims should be filed by the end of 2023. The PIU will review such unresolved claims and supporting documentation for resolution.</p> <p><i>Date: June 30, 2023.</i></p>	<p>Completed.</p> <p>On June 9, 2023, the PIU organized a training and awareness-raising workshop for GRM focal points.</p> <p>On June 13 and 14, 2023, the PIU, jointly with the GRM focal points, carried out awareness-raising activities in the communities to inform them that the GRM will remain available to receive claims from former workers.</p> <p>Two claims regarding injuries were received and have been addressed.</p> <p>A: One claim was deemed eligible, and the person's physical therapy and loss of revenue were paid by the Project. The claim was closed in the GRM with the</p>	<p>The Bank will review the outreach to the affected communities and will also follow up by Project closure with the PIU to confirm that claims received have been reviewed and resolved.</p> <p><i>Date: July 15, 2023.</i></p>	<p>Completed.</p> <p>The Bank reviewed the outreach to the affected communities on several occasions. Most recently, during a mission (June 24-28, 2024), the Bank reviewed the progress made regarding the community outreach and the processing of claims, and the Bank was satisfied with the progress made.¹ The Bank regularly reviews the GRM log.</p>

¹ The Bank recommended periodic (annual) elaboration of a GRM strengthening plan. The 2024 plan included the establishment of a toll-free number for the GRM, which has been functional since March 2024, and sensitization of GRM committees and communities in July and August 2024, respectively, including through the Coastal Radio (Radio du littoral).

Issue/Finding	Borrower Actions		Bank Actions	
	Description	Status	Description	Status
		<p>plaintiff's satisfaction noted.</p> <p>B: One claim was deemed ineligible because the name of the person was not in the contractor's list of workers and the treatment dates in the healthcare booklet <u>predated</u> the start of the works. The complaint was closed in the GRM with the plaintiff not satisfied. The plaintiff re-introduced the same claim under a different name. The PIU has reviewed the complaint again in light of the name change and confirmed that the complainant did not work for the Project. Accordingly, the complaint has been deemed ineligible and the GRM notified the complainant on August 30, 2024 and closed the case in the GRM log.</p> <p>No other claim has been filed regarding injuries as of August 28, 2024.</p>		
	<p>Allegation of unpaid wages</p> <p>The PIU will advise communities that the GRM will remain available to receive claims from former workers involved in the construction of the Emergency Works who hold any claims of unpaid wages and that such claims should be filed by the end of 2023. The PIU will review such unresolved claims and supporting documentation for resolution.</p> <p><i>Date: June 30, 2023.</i></p>	<p>Completed.</p> <p>On June 9, 2023, the PIU contacted community Chiefs to inform them that the GRM will remain available to receive claims from former workers and trained the GRM focal points on these specific types of complaints.</p> <p>On June 13 and 14, 2023, the PIU and GRM focal points carried out joint awareness-raising activities in the communities.</p> <p>One claim regarding unpaid wages was received and has since been addressed.</p> <p>The claim was deemed ineligible as the person claimed to have worked on days <u>after</u> the completion of works. The plaintiff has been notified of the ineligibility of the claim.</p> <p>No other claim has been filed as of August 28, 2024.</p>	<p>The Bank will review the outreach to the affected communities and will also follow up by Project closure with the PIU to confirm that claims received have been reviewed and resolved.</p> <p><i>Date: July 15, 2023.</i></p>	<p>Completed.</p> <p>During the supervision missions and periodic meetings with the PIU, the Bank has monitored the outreach effort to communities and processing of claims, and advised the PIU to continue to record, review, and resolve claims in the GRM.</p>

Issue/Finding	Borrower Actions		Bank Actions	
	Description	Status	Description	Status
<p>3. Livelihood Restoration</p> <p>The Panel finds that not all PAP [Project-affected people] characteristics of vulnerability identified in the socioeconomic data were considered for compensation. The Panel also finds no evidence that a vulnerability analysis was conducted which would have considered landless people and people living below the poverty line as part of this analysis. The Panel finds Management is not in compliance with OP 4.12, paragraph 8.</p>	<p>Resettlement Action Plan (RAP) audit</p> <p>The PIU will commission a RAP Audit to assess whether all relevant impacts were identified and whether RAP implementation was satisfactory and in compliance with OP 4.12.</p> <p><i>Date (for submission of draft RAP audit report): September 30, 2023.</i></p>	<p>Completed.</p> <p>On July 12, 2023, the PIU submitted ToRs for the RAP Audit to the Bank.</p> <p>On August 29, 2023, the consultant started working.</p> <p>The final RAP Audit was submitted on April 15, 2024.</p> <p>The Audit concluded that the RAP complied with OP 4.12 in several respects, including support to vulnerable people. But it also found shortcomings that have since been either addressed or are being incorporated as lessons learned going forward.</p> <p>In particular, the Audit found that works began without all identified PAPs having been compensated. Since then, however, all identified PAPs have received their compensation or other resettlement assistance in full.</p>	<p>The Bank will review and provide feedback and recommendations as may be needed on the proposed ToRs and the draft Audit report, which will also require Bank clearance.</p> <p><i>Date (for clearance of RAP Audit report): October 30, 2023.</i></p>	<p>Completed.</p> <p>On July 13, 2023, the Bank provided its no-objection to the ToRs.</p> <p>On April 15, 2024, the Bank provided its no-objection to the final RAP Audit.</p>
<p>4. Impact from the Combined Works on the Fishing Community</p> <p>The Panel finds the Project is not in compliance with OP 4.01, paragraph 3, for not having assessed adequately the potential environmental risks and socioeconomic impacts of the Combined Works on the fishing community, especially those practicing beach seine fishing, in the Project area.</p>	<p>Support for local communities</p> <p>The PIU will design and implement a social sub-project financed under Subcomponent 3.2 to support economic activities and improve resilience for individuals and groups that live in the larger coastal Project zone. This will specifically include the individuals and/or groups involved in fishing activities, such as the beach seine fishers and <i>mareyeuses</i>. The design of these activities and eligibility for them will be informed by the results of consultations with the local communities, being undertaken by a social consultant who has been engaged for this purpose.</p> <p><i>Date for completion: September 30, 2023 for proposed design for these activities.</i></p>	<p>Completed.</p> <p>On August 28, 2023, modalities and design to implement these activities were submitted to the Bank.</p> <p>On September 6, 2023, a revised document was submitted to the Bank.</p> <p>On December 26, 2023, the PIU submitted the final design to the Bank. The social sub-project includes acquisition of fishing, fish-smoking and gardening equipment, latrines, and training in managing the new activities/investments. It benefits 160 community associations, totaling 1,194 individuals of which 85% are fishers.</p>	<p>The Bank will provide technical assistance and support to the PIU in the design process of this social sub-project and will appraise and clear its final design.</p> <p><i>Date (for completion): November 30, 2023, Bank provides no objection on the design.</i></p>	<p>Completed.</p> <p>On November 16, 2023, the Bank provided feedback on the design.</p> <p>On December 29, 2023, the Bank provided its no-objection to the final design.</p>
				<p>As a contribution to global knowledge, the Bank will commission a study of the evolution of beach seine fishing on the West African coast. This study will look at the challenges for fishing communities posed by coastal erosion and those that may result from technical interventions to address coastal erosion. This</p>

Issue/Finding	Borrower Actions		Bank Actions	
	Description	Status	Description	Status
			will include identifying possible support for adapting fishing and related practices to these changes. Management will ensure that the Bank's efforts are coordinated with FAO's ongoing work in the area in Togo. <i>Date (for completion): June 30, 2024.</i>	

10. ***Additional information on the actions reported in the table:***

- ***Removal of Pipes:*** The PIU contracted a company to monitor pipe integrity and signage/lighting beacons, and to manage the repair, removal and cleanup of broken and dislocated pipes in the area of the Emergency Works. Removal of broken pipes has started in Adissem. Community consultations ahead of the removal were held on January 22, 2024. On March 23, 2024, the removal of broken pipes began. As of June 28, 2024, 1,780 out of 2,000 broken pipes on the beach have been removed, while the remaining 220 in deep water are to be removed when weather conditions permit these works. In addition, 270 unused pipes that had been stored near the beach have been removed. The removal of pipes in the other 5 locations will start in connection with the installation of the groyne system. Decommissioning of pipes from Adissem followed an environmental and social screening that led to an environmental and social management plan (ESMP) and contractor ESMP.
- ***Monitors:*** The third-party monitors are in place and are reporting frequently to the PIU on coastal erosion events and repairs needed to the signage when it is damaged by weather, or on occasion, has been vandalized.

11. ***RAP Audit:*** The RAP Audit of the segment from Agbodrafo to Aného concluded that the RAP complied with OP 4.12 in several respects, including support to vulnerable people. But it also found shortcomings that have since been either addressed or are being incorporated as lessons learned going forward. In particular, as noted in the table above, the Audit found that works started without compensation of all identified PAPs. Since then, however, all identified PAPs have received their compensation or other resettlement assistance in full. The Audit pointed to issues that were linked to inadequate access to the GRM at the local level. These shortcomings have since been addressed by further improvements to the GRM system. The Audit also noted a shortcoming concerning preparation of a livelihood restoration plan. To address this, the social sub-projects under sub-component 3.2 complement the livelihood measures by providing income-generating activities, equipment, and training to coastal communities, including PAPs:

- ***Support for local communities:*** The new social sub-project was designed and awareness-raising of communities began on February 21, 2024. Implementation is expected to take 18 months, including an evaluation phase and scaling up, based on demand.
- ***Fisheries study:*** The study was carried out by Bank experts in collaboration with the FAO, and underwent a Decision Review on June 10, 2024, following which the study was shared with the Borrower.

Finally, some of the shortcomings that the Audit listed were linked to the RAP implementation process itself, and these findings are being incorporated as lessons learned going forward.

12. **Monitoring and management of the coastline.** The coastal barrier in Togo remains fragile and highly susceptible to changes in the built and natural environment. For this reason, the new joint co-financing obtained includes the development of a long-term monitoring scheme for the Togo-Benin coastal protection built by the Project. Similarly, the Government is monitoring the occurrence of extreme weather events that continue to cause coastal erosion, such as in Adissem. The Bank is working with the National Agency for Disaster Management (ANPC) to find solutions for those affected by coastal erosion while the long-term coastal protection (groynes and sand replenishment) awaits installation.

Stakeholder consultations

13. **Meeting with Requesters.** On June 7, 2024, Management invited the Requesters to participate in consultations on the MAP implementation status. Invitations were extended using email and WhatsApp. The contact provided by the Inspection Panel for the Requesters declined to meet with the Bank or participate in the consultation. This person delegated participation in the meeting to a group of three co-Requesters. The Bank met with this group on June 27, 2024, in Agbodrafo, Togo. The Bank did not set any limit on the number of participants. The Bank team facilitated the meeting, which began with a short opening presentation and background information on the MAP to address Panel findings. The group then had the opportunity to speak, with multiple rounds of questions and answers. The group was consulted on the MAP completion and had no comments. Participants acknowledged the importance of the Project and recognized that the stabilization of the coastline was significant for the communities and their livelihoods. They reiterated the importance of removing broken pipes at Adissem.

14. The consultation meeting allowed sufficient time for the group to provide its feedback on the actions. A second meeting was offered in case the community members needed more time to discuss internally but was declined. No representatives of the PIU or any other Borrower agency were present during the consultations. The meeting was translated into the local language (Ewe) by a professional interpreter. The group declined to take a photo of the consultation in order to maintain the participants' anonymity, which the Bank team respected. After the meeting, Bank staff and one person of the group jointly observed beach seine fishing practiced on the restored beach in Agbodrafo. Before the installation of the groynes, beach seine fishing had been abandoned in this area due to the degraded beach and "beach rock." As a result of the Project, beach seine fishing has resumed.

15. **Community Meeting:** On June 26, 2024, the Bank team and PIU convened a community meeting to present the implementation status of the MAP to the broader community and to gather feedback on the social sub-project implementation plan. A total of 22 community members took part in the consultations (see Photo 1). They agreed to the Bank representatives recording their attendance and taking photographs of the consultation meetings. The community members appreciated the ample clarifications provided by the Bank team on the process and the roles and responsibilities of the parties involved. The community members further expressed support for the completed actions in the MAP and satisfaction that the Bank had overseen its implementation. The community meeting was attended by 22 beneficiaries, including 14 men and 8 women, representing fishermen, fishmongers (*mareyeuses*), market gardeners (*maraiheres*) and community members benefiting from small infrastructure included in the social sub-project (e.g., latrines). The discussions focused on the sustainability of the planned investments and how beneficiaries will organize the maintenance of the infrastructure and equipment that will be provided by the Project.



Photo 1: Photo of Community Meeting, June 26, 2024.

III. NEXT STEPS

16. This Progress Report will be provided to the Requesters, and publicly disclosed on the Bank's website.