

REPORT No. 172199-AFR

THE INSPECTION PANEL

SECOND REPORT AND RECOMMENDATION ON A REQUEST FOR INSPECTION

TOGO

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



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THE WORLD BANK
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**The Inspection Panel Second Report and Recommendation
on a
Request for Inspection**

**Togo: West Africa Coastal Areas Resilience Investment Project (P162337), Additional
Financing – West Africa Coastal Areas Resilience Investment Project (P176313), and
Global Environment Facility (P092289)**

A. Introduction and Background

1. On August 4, 2021, the Inspection Panel (the “Panel”) received a Request for Inspection (the “Request”) of the West Africa Coastal Areas Resilience Investment Project (P162337), Additional Financing – West Africa Coastal Areas Resilience Investment Project (P176313), and Global Environment Facility (P092289) (jointly referred to as WACA or the “Project”) in Togo. The Request was submitted by two community members living in the villages of Kpogan¹ and Kpémé on the coast of Togo who represent Project-affected communities. On August 27, 2021, a third community member living in the village of Agbodrafo, Togo, signed the Request. On the same day, the Panel received additional signatures from 27 project-affected persons (PAPs) living in nine villages,² as well as from a community-based organization authorized by the Requesters to represent them. The Requesters have asked the Panel to keep their identities confidential fearing intimidation and reprisals.

2. The Project was approved on April 9, 2018, for a total of US\$221.70 million equivalent, of which US\$120 million equivalent is an International Development Association (IDA) Credit, and US\$70 million equivalent is an IDA Grant. It is a regional project benefitting Benin, Côte d’Ivoire, Mauritania, São Tomé and Príncipe, Senegal, and Togo. Togo is the recipient of US\$30 million equivalent in IDA Credit and US\$15 million equivalent in IDA Grant. In addition, the Global Environment Facility is providing a Grant of US\$20.25 million to Benin, São Tomé and Príncipe, and Togo, of which Togo is the recipient of US\$7.53 million. On June 18, 2021, the Board of Executive Directors (the “Board”) approved an additional IDA Credit of US\$18 million equivalent and an additional IDA Grant of US\$18 million equivalent to reflect the coverage of cost overruns. The additional financing is to support Component 3 in Benin and Togo. Component 3 aims to strengthen national physical and social investments, to protect vulnerable areas from coastal erosion and flooding, to support pollution control and waste management operations, and to promote climate-resilient coastal development. Togo is the recipient of US\$6 million equivalent of the additional IDA Credit, and US\$6 million equivalent of the additional IDA Grant. The Project Implementation Unit (the “PIU”) is the West Africa Coastal Areas Management Program, which is part of Ministry of Environment and Forest Resources.

3. The Request raises concerns about involuntary resettlement, loss of livelihoods, lack of consultation and information disclosure, as well as other project impact and insufficient analyses

¹ The Panel observes that, although Kpogan village is not part of the Project area, Kpogan community members participate in fishing activities in the Project area – Kpémé and Agbodrafo.

² The nine villages are Adjissenou, Agbavi, Agbodrafo, Alimagna, Djéké, Follygah, Gbodjomé, Kpémé, and Kpogan. However, Kpogan is not part of the Project area.

of project alternatives.³ Some of the alleged impacts relate to the construction of new groynes and the rehabilitation of existing ones stretching from Agbodrafo to Aného; this Report refers to these coastal protection works as the permanent structures. Other alleged impacts relate to the emergency protection works implemented to halt coastal erosion in the area stretching from Gbodjomé to Adissem. The emergency protection works comprise the installation of concrete pipes, which are meant to be a temporary solution to limit erosion whilst further funding is secured for permanent structures.

4. The Panel registered the Request on September 7, 2021, and notified the Board and Bank Management. Management submitted its Response on October 7, 2021 (the “Response”).

5. Management’s Response stated that the Bank has followed the policies and procedures applicable to the matters raised in the Request. The Response committed to supporting the government of Togo in the implementation of the Project, recognizing the need to maintain strong engagement with the affected communities. The Response included the following actions to address the concerns raised: (i) conduct a social audit (the “Social Audit” or “Audit”, attached to this report as Annex B) to assess any unintended impact that may have resulted from the temporary access restrictions during the Project’s emergency works; (ii) provide adequate options to ensure free access to the beach and limit any interference with boat landing and fishing activities; (iii) pilot the Local Action and Citizen Engagement (LACE) initiative in Togo that aims to support information sharing, capacity building and dialogue with local communities as part of a community-based resilience approach; and (iv) better target stakeholders and local communities with a more proactive information campaign regarding coastal zone development challenges in Togo.

6. Management noted, in its Response, that a site-specific Resettlement Action Plan (RAP) was being prepared to cover impact directly related to the construction of the groynes, as well as any impact related to the establishment of a safety zone around these groynes.⁴ Management also clarified that a final version of the RAP would be reviewed by the Bank and would require a no-objection before it is considered ready for implementation.⁵

7. On November 8, 2021,⁶ the Panel submitted its first Report and Recommendation.⁷ The Panel recognized that the Project is welcomed by the different stakeholders including the Requesters in Togo who understand that it is critical to addressing the immediate threat they are facing due to the eroding coastline. The Panel determined that the Requesters and the Request for Inspection, with the exception of the allegations regarding evictions,⁸ met the technical eligibility

³ In this report, the Panel has not discussed the project alternatives as this issue was sufficiently covered in the first Report and Recommendation.

⁴ Management Response, p. 11, para. 37.

⁵ Management Response, p. 15, para. 51.

⁶ The Panel conducted a field visit to Togo from October 20 to 27, 2021.

⁷ Inspection Panel, 2021. [TOGO West Africa Coastal Areas Resilience Investment Project \(P162337\), Additional Financing – West Africa Coastal Areas Resilience Investment Project \(P176313\), and Global Environment Facility \(P092289\)](#).

⁸ Concerning the threat of evictions, the Panel determined that while these concerns are of serious character and real to the community, the announcement of potential evictions and the need to clear a beach strip as public domain are not related to the Project’s work or Project’s planned activities.

criteria set forth in the Panel Resolution.⁹ The Panel considered the alleged harm to be plausibly linked to the Project, and that the Request raises serious issues of alleged harm and potential policy non-compliance.

8. Further, the Panel noted that Management had committed to actions to improve Project implementation. These actions included the review and clearance of the RAP. Management had noted that the RAP's footprint was likely to change and affect the scope of the RAP. The Panel observed that the remedial actions Management had committed to were defined, measurable and timebound. The Panel therefore decided to defer its recommendation as to whether an investigation was warranted until Management had been given sufficient time to address the alleged harms raised by the Requesters. The Panel indicated that it would reassess the situation in light of the implementation of the Management actions and would inform the Board of its recommendation within six months. The Board approved the Panel's deferral recommendation on November 22, 2021.

9. On May 3, 2022, the Panel requested and the Board approved a one-month extension of the Report to be submitted on June 8, 2022. Based on its assessment below, the Panel recommends carrying out an investigation, focusing on the allegations of impact from both the emergency works and permanent structures.

B. Developments Since the Panel's First Report and Recommendation

10. The section below presents the developments since the Panel's first Report, including a summary of an update by Management which contains the status of agreed actions the Bank had previously committed to.¹⁰ The Management Update is attached to this report, as Annex A.

11. **Management's Update.** On April 19, 2022, Management provided an update of the actions it committed to in its Response to the Request for Inspection to inform the Board and the Panel of the most recent developments. In this update, Management indicated there has been intensified implementation support for the Project, with specific attention to the finalization of the RAP and the Environment and Social Impact Assessment (ESIA). According to Management, the December 2021 RAP was finalized and disclosed in Togo on February 4, 2022, and the ESIA was finalized and disclosed on February 17, 2022.¹¹

12. Concerning the emergency protection works, Management provided updates on four actions: the preparation of the Social Audit, which Management shared with the Panel on May 4, 2022; a summary of the impact of the works relating to boat landings, the implementation of the LACE initiative, and the ongoing information campaign.

13. On May 4, 2022, Management shared with the Panel the ESIA, along with its annexes, and the RAP, dated December 2021, for the coastal area from Agbodrafo to Aného. On May 19, 2022,

⁹ [The World Bank Inspection Panel, Resolution No. IDA 2020-0003](#), September 8, 2020 (the "Resolution").

¹⁰ Update on Management Actions, to its Response to a Request for Inspection Panel Review of the Togo, Western Africa: West Africa Coastal Areas Resilience Investment Project (P162337); Additional Financing – West Africa Coastal Areas Resilience Investment Project (P176313); Global Environment Facility (P092289), April 19, 2022.

¹¹ April, 2022. Management Update, p. 1.

during the field visit, Management indicated to the Panel that it had found some discrepancies in the database of PAPs and is therefore updating the previously cleared December 2021 RAP to reflect the latest list of PAPs, heads of households and dependents, as per the September 10, 2021 cut-off date. Further, on May 24, 2022, the Panel also received from Management a Note on Fisheries and Coastal Protection, which is attached to this report as Annex C.

C. Panel's Observations

14. To determine whether an investigation is warranted, the Panel assessed the implementation of Management actions. In doing so, the Panel reviewed relevant documents and conducted a field visit to Togo from May 18 to 26, 2022. This visit was led by Panel Member Mark Goldsmith, and included Senior Operations Officer Serge Selwan, and Analyst Camila Jorge do Amaral. In Togo, the Panel team met with representatives of the World Bank Country Office and the Project team. The Panel team appreciates the logistical support provided by the Country Office throughout the visit.

15. In addition, the Panel team met with the Economic Advisor to the Presidency, the Minister of Maritime Economy, Fisheries and Coastal Protection, the Minister of Environment and Forest Resources and with the PIU. The Panel also met with officials of the municipalities of Lac 1 in Agbodrafo and Lac 3 in Aného and village chiefs and representatives in the villages and communities it visited. Further, the Panel met with the Requesters, other potentially affected community members, members of fishermen associations, and civil society representatives, and conducted meetings and walkthroughs in the villages of Adissem, Agbodrafo, Kpémé, Goumkopé, Dévikinmé, Tango, Nimagna, Gbodjomé, and Aného.

16. The Panel reviewed the implementation of Management's actions and commitments regarding the following three areas: a) alleged impact resulting from the emergency protection works; b) preparation of the safeguard documents, including the RAPs, regarding the permanent structures from Agbodrafo to Aného; and c) alleged impact from both emergency works and permanent structures, including the gendered impact, the implementation of a GRM, and the consultation processes.

C.1 Alleged Impact from Emergency Protection Works

17. The Panel was informed by government stakeholders and the Bank of the experimental nature of the emergency protection measures. This is in line with what the Panel was informed of during the previous visit.¹² The Panel understands from Management that there are efforts underway seeking funding for a permanent solution for the coastal area stretching from Gbodjomé to Agbodrafo. Within this stretch there are six emergency sites located in five villages: Gbodjomé, Dévikinmé, Tango, Adissem, and Nimagna. Dévikémè 1 and 2 are two sites in the same village.

¹² The Panel heard from government authorities that the type of intervention used in the emergency works was an experiment and had not worked well. The Inspection Panel, 2021. [Report and Recommendation on a Request for Inspection TOGO West Africa Coastal Areas Resilience Investment Project \(P162337\), Additional Financing – West Africa Coastal Areas Resilience Investment Project \(P176313\), and Global Environment Facility \(P092289\)](#), p. 13, para 58.

18. The Panel notes that an Environmental and Social Screening (the “E&S Screening”) was conducted in March 2020 for the emergency protection. The Panel notes that the E&S Screening categorized the emergency protection measures as environmental category “C”, meaning that no further environmental assessment was required. Therefore, these works were not covered by the Project’s ESIA. The Panel notes the Social Audit commissioned by the Bank, appraised the E&S Screening document and determined that the measures identified prior to the start of the emergency works with regard to the fishing sector were considered adequate. According to the Audit, the emergency protection measures had limited impact and caused temporary disruption to the communities’ fishing activities. According to the Audit, the E&S Screening recommended the following mitigation measures: (i) identification of new boat storage areas for the fishermen; (ii) regular assessment of the livelihoods of impacted fishermen; and (iii) ongoing discussions with the fishermen.¹³

19. However, the Audit found that: “(i) *Instead of finding an alternative beaching location for the boats, the Contractor relocated the concrete pipe segments that were being stored prior to installation;* (ii) *The PIU confirmed that they did not undertake any regular evaluation of the means of subsistence of the affected fishermen (...);*” and, (iii) discussions between the fishing communities, the contractor, and the PIU were ongoing and led to the modification of the initial plans to integrate the creation of two 50-meter pipe free corridors, in Adissem to allow safer access for boats to the sea. The Audit also stated that permanent monitoring of sites had been strengthened with weekly supervision missions by the Country Office since September 2021.¹⁴

20. The analysis below reviews Management’s update on the emergency protection works as it relates to: i) the impact on the fishing communities and their livelihoods; and ii) the implementation of measures to mitigate against impact on the communities’ health and safety.

a) Alleged Impact on Fishing Communities and their Livelihoods

21. **Presence of Fishing Communities.** The Social Audit reviewed available documents as well as information gathered during site visits and interviews with representatives of the Project’s stakeholders between January 24-31, 2022.¹⁵ According to the Social Audit, out of the six sites where emergency protection works took place, two include fishing communities and had visible fishing boats nearby (Adissem and Tango).¹⁶ Regarding the other four (Dévikinmé 1 and 2, Nimagna, and Gbodjomé), the Audit concluded that there were no active fishing communities at the time of the field visit and therefore no details of fishing activities were provided.¹⁷

22. The Panel visited the six emergency protection sites and spoke to community members in five of them (the Panel did not meet community members in Nimagna). The Panel confirmed that Adissem and Tango have fishing communities. The Panel also observed and met with fishing communities in three other sites (Dévikinmé 1 and 2, and Gbodjomé). In Dévikinmé, the Panel

¹³ World Bank, 2022. Togo West Africa Coastal Areas Management Program (WACA) Resilience Investment Project (ResIP, P162337) - Social Audit of the Emergency Protection Sub-Project - Report of the social audit mission (the “Social Audit of the Emergency Protection Sub-Project”), p. 11.

¹⁴ Social Audit of the Emergency Protection Sub-Project, p. 11.

¹⁵ Social Audit of the Emergency Protection Sub-Project – Executive Summary, para 1.

¹⁶ Social Audit of the Emergency Protection Sub-Project, p. 3.

¹⁷ Social Audit of the Emergency Protection Sub-Project, p. 3.

met with a large group of fishermen, and their fishing association delegate, several of whom had just returned from fishing. According to these communities located by the emergency protection works, all the villages which have emergency protection measures installed have fishermen, *mareyeuses*,¹⁸ and are considered fishing villages. Community members stated that most of them were already adapting to coastal erosion and climate change and now have to adapt to the concrete pipe walls that have been installed by the Project in the five villages as experimental coastal protection measures. In Gbodjomé, the Panel spoke with a fisherman who indicated that this village was a fishing community.

23. **Impact of Concrete Pipes and Pipe Walls.** In four of the villages, Gbodjomé, Dévikinmé, Tango, and Adissem fishermen informed the Panel that they try to work around the pipes despite their difficulty carrying heavy boats over broken pipes scattered throughout the beach, sometimes for 100 meters distances, particularly in rough weather. The fishermen told the Panel the concrete pipe walls limit their opportunity to go out to sea and how much time they can spend at sea, as their departure and landing spaces are now confined.

24. The Panel notes that the impact varies for each fishing technique.¹⁹ The Panel observed that for the *Tunga* technique, fishermen need to land smaller boats on the shore while for the *Senne Tournante*, boats are kept at sea. In both cases, fishermen swim to shore at some point, either to guide their crew or pull their boats, or to return to shore. The Panel heard from these fishing communities that the length of the pipe walls has direct implications on their ability to access the sea and conduct fishing activities, which is their main source of livelihood as well as for many of the women in the community.



Picture 1: Collapsed concrete pipe wall in Tango

¹⁸ Wholesale merchant (fishmongers), also known as fish transformers, who buy and prepare fish, crustaceans, and shellfish for resale. They play an important role in the chain of distribution and transformation of fishery products.

¹⁹ In its previous Eligibility Mission, the Panel observed that artisanal fisherfolk use different fishing techniques, including the *Senne de Plage*, *Senne Tournante*, and *Tunga*. Some of these techniques are common to several of the villages along the coast and some appear to be unique to a particular set of villages and that there is an entire microeconomy around artisanal fishing involving many different stakeholders. When the fisherfolk return from the sea and the nets are hauled to the beach, they are joined by many of the rest of the community, including women, children and elderly people who all participate in the downstream fishing economy – The Inspection Panel, 2021. [Report and Recommendation on a Request for Inspection TOGO West Africa Coastal Areas Resilience Investment Project \(P162337\), Additional Financing – West Africa Coastal Areas Resilience Investment Project \(P176313\), and Global Environment Facility \(P092289\)](#), paras 47-50.

25. The Social Audit reported that the Project created two 50-meter corridors in the emergency protection pipe wall in Adissem. The Audit noted that the corridor located in the western section of the pipe wall is damaged and contains stranded pipe segments which make it very difficult to use the corridor for the launching and berthing or docking of boats.²⁰ However, on the eastern side of the pipe wall, the Audit found the pipes to be in good condition and indicated that there was unhindered access and egress for boats to berth or land on the shore. The Audit also reported stranded pipes visible on the right foreshore²¹ of the central part of the pipe wall.²² According to the Social Audit, the community requested the extension of the pipe wall works towards the east in order to protect the cemetery adjacent to the village.²³ The Social Audit further noted that no complaints had been recorded in Adissem regarding possible loss of income resulting from a reduction in the fishing activity of the community, due to the obstacles created by the works.²⁴ The Audit points out that the village population confirmed its satisfaction with the works.²⁵



Picture 2: Concrete pipes stranded in the eastern corridor in Adissem.

26. In line with the Audit's observations, the Panel noted that the western section of the pipe wall is damaged and contains stranded pipe segments which the community claims make it very difficult to use for fishing. The Panel, however, observed that the eastern side, which is the only active corridor, also contains stranded pipes blocking the access. In addition, the fishermen of Adissem reported an accident where a fishing boat was damaged attempting to safely enter the eastern corridor. Furthermore, the Panel was told by the fishermen of Adissem that during the period in which the pipes were being built, they were unable to access the sea for approximately two to three months due to the obstacles covering the beach. They stated that during that period they were unable to fish and suffered a loss of income for which they claim they did not receive compensation.

27. Regarding the village of Tango, the Social Audit indicated that the emergency protection works were completed without issues reported and no significant wave related damage was

²⁰ Social Audit of the Emergency Protection Sub-Project, p. 4.

²¹ The part of a shore between high- and low-water marks, or between the water and cultivated or developed land.

²² Social Audit of the Emergency Protection Sub-Project, p. 7.

²³ Social Audit of the Emergency Protection Sub-Project, p. 7.

²⁴ Social Audit of the Emergency Protection Sub-Project, p. 9.

²⁵ Social Audit of the Emergency Protection Sub-Project – Executive Summary, para 5.

incurred.²⁶ In addition, the Audit reported there had been no complaints registered related to the works from the fishing community of Tango.



Picture 3: Concrete pipe wall in Tango.

28. Consistent with the Audit, the Panel observed that there is a fishing community in Tango. One of its members indicated that he is no longer able to launch or dock his boat in Tango due to the pipe wall, which, unlike Adissem, does not contain a corridor for that purpose. He showed the Panel his damaged boat alleging that the damage was caused by the pipe wall. The Panel observed that the beach access is blocked off in Tango and that a section on the eastern section of the pipe wall had collapsed and fishermen now must carry their boats 100 meters away from their past access point.

29. The Panel saw stranded concrete pipes and pipe walls with similar issues in the villages of Dévikiomé and Gbodjomé, which the fishing communities claim causes harm to them in the form of: damaged boats, torn nets, access and time restriction at sea, and increased risk of injury to the fishermen and community members. The Panel notes that some of these harms are temporary while others may be of a more permanent nature, depending on (i) the frequency and effectiveness of the maintenance works, and (ii) how long the emergency measures are maintained in place.

30. Fishermen the Panel met with acknowledged that the pipe walls contributed to the protection of the coast but stated that this measure should not be permanent as it is also adversely affecting them. They consider that the impact to their safety and livelihood is becoming disproportionate to the protection afforded by the pipe walls. Fishermen in Adissem mentioned that the community was not consulted on the detailed location of the pipe walls and the Project “*never held ceremonies or rituals to the sea before the installation of the pipes.*” They told the Panel they believe they are “*cursed by the sea because these rituals were not held.*”

31. **Construction and Maintenance of the Pipes.** The Audit found that the Project had significant positive impact on the living conditions of the communities, including the income generated by the wages paid for local labor on the construction of the concrete pipes.²⁷ According to the Audit, the community of Adissem recognized the positive impact of the emergency works

²⁶ Social Audit of the Emergency Protection Sub-Project, p. 8.

²⁷ Social Audit of the Emergency Protection Sub-Project, p. 10.

on household income through the remuneration paid by the contractor to the employed inhabitants.²⁸

32. The Panel notes that there are some benefits generated by the wages paid for local labor for the construction and maintenance of the concrete pipes. However, the Social Audit does not demonstrate whether those wages covered the losses to the fishermen's livelihoods. It also does not demonstrate whether the laborers are affected fishermen, nor did it demonstrate if the wages paid for their labor during the construction or maintenance of the pipes covered the losses incurred from their inability to fish because of accidents and injuries or the lack of access. The Panel met with community members in Adissem and Dévikinmé who claimed they worked on the construction or maintenance of the concrete pipes. Some of these laborers stated that payments were irregular and that some were not paid for their work up to three months. Many cited a lack of payment for work conducted during the month of February.

b) Mitigation against Impact on Community Health and Safety

33. The Social Audit noted that the E&S Screening recommended several health and safety measures be put in place during the construction and operation of the emergency protection works.

34. **Adequacy of Safety Signs.** The Audit stated that there was a lack of markings in the areas where the works took place in the western part of Adissem. According to the Audit, this could have exposed children, vulnerable people, and residents to the risk of accidents and, therefore, required corrective measures to be taken.

35. According to the Audit, the concrete pipe walls should have adequate signage that is visible both during the day and night from the sea and the coastline on all sites, to reduce the risk of collision with boats. The Social Audit suggests, for example, that poles exceeding the height of the pipes by three or four meters may be fixed at the ends of the pipe walls, one in the middle pipe, or the most forward one in the sea. Illuminated signage (fixed or flashing Light Emitting Diode (LED) bulbs powered by solar battery) could be attached to the top of each pole.²⁹

36. During its field visit, the Panel noted that small safety signs had been installed in Adissem. The signs say "Stop - Attention Obstacle" written in French. Some of them were installed where there are no pipes. The Panel witnessed their installation in Gbodjomé. They were being installed properly on top of the pipe walls. The Panel observed the signs exceeded the height of the pipes by approximately one and a half meters and were not illuminated or fixed with flashing LED bulbs. The Panel was not able to confirm if the signs were of reflective material and the fishermen had not gone out to sea to test them since their installation. The Panel, therefore, cannot confirm whether they are visible from the sea. Furthermore, the Panel is concerned whether these signs will withstand the pressure from rough seas.

37. **Alleged Impact of Damaged Pipes.** The Social Audit reported that during discussions with the Adissem community, a fisherman referred to a boat that was damaged following a

²⁸ Social Audit of the Emergency Protection Sub-Project, p. 11.

²⁹ Social Audit of the Emergency Protection Sub-Project, p. 16.

collision with a pipe stranded on the beach.³⁰ In addition, the Audit indicated that communities mentioned one incident where two swimmers hit segments of the concrete pipes that were submerged under the water.³¹ The Social Audit indicated that emergency protection works may have created new risks for the fishing communities of Adissem and Tango but that these were temporary risks arising from the presence of segments of pipes stranded on the foreshore.³²

38. The Panel notes the pipes in Tango prevent direct access to the sea, and fishermen have adapted by shifting the berthing location of their boats by about 100 meters westward from their past access point due to lack of direct access to the sea.³³ A fisherman the Panel met with stated that the concrete pipes constitute a potential danger for the boats and their occupants if they drift towards the installations during swells or errant waves. The Audit recognized that this risk did not exist before the emergency protection works.³⁴

39. The Social Audit indicates of the safeguard measures adopted none addressed the safety of the sites specifically as it relates to i) the segments of pipes stranded on the foreshore that were partially buried; and ii) the risk of collision between the boats and the concrete pipe walls.

40. The Panel saw and examined a damaged boat in Tango and learned about five boats that were damaged by the concrete pipes. The community mentioned that another five boats had suffered damages unrelated to the pipes, and they were, therefore, left with only five operational boats to use for their fishing activities. The Panel witnessed firsthand the strength of the waves.

41. In this context, the Panel was informed that fishermen must jump off the boats and swim to guide their boats into the corridors and away from the pipes. The Panel was also informed that some of the fishermen in different communities affected by the emergency protection works have suffered personal injuries due to pipes stranded in the foreshore and due to the pipe walls.

42. During its field visit, the Panel learned from the PIU that it has assigned a focal person at each site to report on the status of the pipes. The Panel met with two of these newly appointed focal persons who confirmed they have been provided with a mobile phone and credits and that they have been sending daily reports with pictures. Despite the current reporting, the Panel observed that the pipe walls at all the emergency protection sites are deteriorating and noted no maintenance is currently taking place. The Panel understands from the government authorities and the PIU that the inability to maintain the pipe walls is due to the condition of the sea and the high tides.

C.2 Preparation of the Safeguards Documents for the Permanent Structures

43. The section below provides the Panel's considerations as they relate to Management's commitment to the finalization of the ESIA and RAP and to addressing the allegations of livelihood impact that could result from the planned works for the permanent structures.

³⁰ Social Audit of the Emergency Protection Sub-Project, p. 8.

³¹ Social Audit of the Emergency Protection Sub-Project, p. 9.

³² Social Audit of the Emergency Protection Sub-Project, p. 9.

³³ Social Audit of the Emergency Protection Sub-Project, p. 10.

³⁴ Social Audit of the Emergency Protection Sub-Project, p. 10.

a) ESIA and Resettlement Action Plan

44. Management shared with the Panel a copy of the cleared and disclosed ESIA. The Panel notes that the ESIA contains locations and dimensions of the thirteen groynes.³⁵ Management also shared with the Panel the December 2021 RAP which states that seven new groynes will be built and six old ones rehabilitated. In addition, one breakwater and one seawall will also be constructed.

45. The December 2021 RAP covers economic and physical displacement. It also covers the temporary and permanent impacts caused by the construction and maintenance of the groynes. The December 2021 RAP identifies an impact zone and a zone of influence in relation to the groynes. The PAPs in the impact zone will be affected permanently while those in the zone of influence will be affected temporarily. The resettlement is implemented by the PIU with the national expropriations committee (the COMEX), which is the agency responsible for acquiring land, signing agreements with the PAPs and administering the compensation payments.

46. The December 2021 RAP states that, in total, there are 63 affected households including 9 women-headed households and 54 male-headed households. The December 2021 RAP identifies the following numbers and categories of occupations per head of household: 18 fishermen, four *mareyeuses*, 15 artisans, six shopkeepers, five civil servants, six retirees, three *vodoun* priests,³⁶ two store managers, two teachers, one accountant, one electrician, and one construction worker.³⁷ According to this RAP there are 517 affected PAPs, out of which there are 186 females and 331 males.³⁸ Also according to this RAP, the census of PAPs was carried out from May 14 to 21, 2021, and updated between September 4 and 10, 2021, which led to changing the eligibility deadline (cut-off date) for the identified PAPs from May 21, 2021, to September 10, 2021.³⁹

47. According to the December 2021 RAP, the compensation for lost assets and trees will be made in cash at replacement cost. The Panel notes no alternative is provided to the cash compensation for loss of assets. The compensation will cover the full replacement cost even though some of the houses were already damaged by the erosion. For those who have a claim of ownership of the land, they will be compensated for the replacement value of the lost land. Compensation will also be given for loss of income, or loss of access to resources, including the sea. This compensation is estimated based on the monthly revenue and will be provided for the duration of the works.⁴⁰ Vulnerable PAPs will receive an additional compensation. Rent assistance for a year is also provided.⁴¹

48. During the field visit, Management indicated to the Panel that it has found some discrepancies in the PAP database and is therefore updating the December 2021 RAP to accurately capture an updated list of the heads of households and their dependents, as per the September 10,

³⁵ WACA Project, 2022. Etude D'impact Environnemental Et Social (EIES) Du Projet De Protection Du Segment Decote Transfrontalier entre Agbodrafo au Togo et Grand-Popo au Benin (the ESIA), p. 125.

³⁶ *Vodoun* is a religion practiced by the Aja, Ewe, and Fon peoples of Benin, Togo, Ghana, and Nigeria.

³⁷ December 2021 RAP, p. 32.

³⁸ December 2021 RAP - Table 7, p. 95.

³⁹ December 2021 RAP, p. 31.

⁴⁰ December 21 RAP - Table 21, p. 111-112.

⁴¹ December 21 RAP, p. 134.

2021, cut-off date. Management also shared with the Panel the updated summarized database of PAPs' head of households and public institutions as well as the updated draft version of the RAP dated May 2022.

49. According to the updated RAP dated May 2022 there are 63 affected heads of households and 163 dependents, which totals 226 PAPs. Management indicated that the updated RAP dated May 2022 will be again updated, finalized, and redisclosed by the end of May 2022.

50. During the visit, the Panel was informed that COMEX is currently negotiating compensation agreements with PAPs using the entitlements matrix and data from the December 2021 RAP. The PIU informed the Panel that COMEX had signed agreements with 41 heads of households. However, no payments were made. The PIU informed the Panel that works would not start until these payments are made and the RAP completion report is cleared by the Bank.

51. The Panel met with several heads of households who were contacted by COMEX to sign an agreement. They informed the Panel that they had not seen the RAP, nor were they asked to participate in any consultation regarding its design and implementation. The individuals further indicated to the Panel they were pressured to sign the agreements; some claimed they were told "*sign the agreement or get nothing at all.*" The Panel received a copy of the template agreement, which is written in French. According to the community most of them do not understand French and many cannot read. Several heads of households who signed the agreements allege they asked COMEX for a copy, which was not given to them. They told the Panel that they were not allowed to take a picture of these agreements either. They stated that the listed amounts were not adequate. They allege they asked for the breakdown of the compensation, which was also not given to them. One of them claimed he insisted and was finally shown on the computer what the compensation represented. He considered that the amount offered as rent support was insufficient to pay rent for him and his family in a property of the same standard.

52. The PAPs raised concerns regarding the unclear resettlement process, including the timeline and compensation payment. PAPs the Panel spoke with alleged they were told they would have to move out within a week of receiving compensation payment. They also told the Panel they do not know when they will get paid and, consequently, when they will need to move out. The Panel visited the house of some of the PAPs who signed the agreement; they were already dismantling their houses, removing roofs and bricks, some even removed their smokehouses which are essential for performing their livelihood activities. The PAPs informed the Panel they were doing this so they could transport and use the material to rebuild their houses when they relocate. An elderly woman head of household claimed to the Panel that COMEX told her that there was insufficient money for compensation. According to her, her house plot was visited, pictures were taken, and measurements made several times. The Panel visited the house, which is located approximately 50 meters from where the PAPs believe one of the groynes would be located, and learned that she was asked how much her house and land would be priced.

53. None of the PAPs the Panel met with seemed to know where or how many groynes would be installed. The Panel noticed there were no signage or markings indicating where the groynes would be installed, nor were there any signs indicating the implementation of a World Bank Project. One of the houses the Panel visited had two non-aligned red lines painted on the boundary

wall, one on the inside and the other on the outside of the wall. The owner of the house indicated he does not know how much of his house will be demolished for the Project and claimed he had not been contacted by the Project. The Panel noted there was a bar located in front of the boundary wall. The owner of the bar told the Panel team they had not had any contact with the Project. The Panel visited a local school, which the RAP identifies as impacted. The RAP states that the school's playground on the seaside is in the impact zone of one of the groynes but not the school building. Based on conversations with community members and its field observation, and due to the proximity of the school structure to the sea, it is unclear to the Panel whether the impact zone of this groyne stretches beyond the playground and includes the school structure.

b) Alleged Impact on Fishing Livelihoods

54. On May 24, 2022, in response to a Panel query on the impact of permanent structures on the fishing, Management shared with the Panel a Note on Fisheries and Coastal Protection (the "Fisheries Note" or "Note") which stated that fishing has traditionally taken place along Togo's 56 kilometers of coastline. According to this Note, artisanal fishing is more prevalent than industrial fishing and involves many small-scale fishers who use very simple gear and techniques.

55. The Note states that, according to the FAO (2020) the fish catch shows a downward trend due to environmental degradation.⁴² The Note further states that the construction of groynes, together with beach nourishment, was identified as the best solution to protect the coast. It adds that the significance of the impact is difficult to assess ex-ante. The Note explains that more than 150 people were consulted in Agbodrafo and Aného in August 2021, in addition to consultations with fishing associations. Disturbance of economic activities was identified as an important impact.⁴³ The Note states that if no groynes were constructed, fishing using *Senne de Plage* nets would likely become impossible in the medium term due to coastal erosion causing the exposure of beach rock, as has been the case in the areas where the emergency protection works were needed.

56. The December 2021 RAP identified among the 63 heads of households, 18 fishermen and 4 *mareyeuses* whose livelihoods may be affected as a result of the construction of the groynes. According to this RAP, 35 percent of the PAPs are fishermen and *mareyeuses*. This RAP also identified 27 groups or association of fishermen practicing *Senne de Plage*. The December 2021 RAP includes compensation for lost income relating to fishing. It further includes livelihood restoration measures to the fishing associations of i) *Senne de Plage*, ii) other fishing techniques, and iii) the *mareyeuse*. This includes amounts allocated to buy boats and nets for the fishermen practicing the *Senne de Plage*, to construct cold storage room for the fishermen practicing other fishing techniques, and to build six warehouses for the *mareyeuses* to use to sell their fish.⁴⁴ These amounts are paid to the heads of the respective associations. An amount is allocated for the training of each of these associations.

57. The Panel spoke to two heads of fishermen associations who informed the Panel that the head of the fishing groups will receive the compensation and distribute it to the fishermen in their

⁴² Per FAO categories of exploitation

⁴³ ESIA, p. 321.

⁴⁴ December 2021 RAP - table 30, p. 133.

groups. The Panel was not informed of any mechanism in place to ensure that all fishermen receive sufficient compensation for lost income or that the amounts are distributed fairly and according to their losses.

58. Several stakeholders raised concerns about the viability of the *Senne de Plage* once the groynes are installed. The Panel observed a *Senne de Plage* in Kpémé. The technique is still performed in Kpémé and Aného crossing the existing groynes, which are in need of rehabilitation. However, several fishermen the Panel met with indicated that the groynes pose several risks, such as: torn fishnets and injuries caused by pulling the net across the groynes. On the other hand, fishermen from other communities informed the Panel that they believe the *Senne de Plage* will no longer be possible once the groynes are installed or the existing ones rehabilitated. The Panel met with government officials who indicated that *Senne de Plage* may no longer be possible and that fishermen should transition to other types of fishing techniques.

59. The Panel notes that the inability to perform *Senne de Plage* would affect those involved in the hauling, known as *aide-pêcheurs* (fishermen assistants), women and children who help pull the fishnets during this fishing activity (see picture below). Fishermen told the Panel that they would need resources to acquire different sets of nets, different boats and motors to transition to other techniques, such as the *Tunga* or the *Senne Tournante*, which they could continue to practice safely after construction of the groynes.



Picture 4: *Senne de Plage* technique in Kpémé.

60. The fishermen informed the Panel that they were concerned about whether they could continue fishing during the construction stage of the groynes. They informed the Panel that there could be a perimeter of one kilometer around the construction area, where they would not be allowed to fish during the time of construction.

C.3 Alleged Impact from both Emergency Works and Permanent Structures

61. The section below provides the Panel's considerations as they relate to the i) gendered-impact caused to the women's activities who rely on buying and selling fish caught by the fishermen; ii) establishment of a grievance redress mechanisms; and iii) consultation process.

a) Alleged Gendered Impact

62. One of the mayors the Panel met with stated that women in fishing communities throughout the coast of Togo play an important role in the microeconomy around artisanal fishing. Women known as “fish transformers” or *mareyeuses* buy the fresh fish from fishermen once they land their catch, to process, smoke, and resell them in local markets. Fisherwomen who are involved in the hauling, during *Senne the Plage*, and triage of fish are known as *aide-pêcheurs*. In some cases, women play more than one role. Some of the women specialize in either smoking and salting fish or selling the fresh fish while others conduct both activities. The women who smoke fish have smokehouses installed in their houses. As per its first visit, the Panel witnessed the process of triage of the fish for each of the activities.

63. The Social Audit indicated that, in Adissem and Tango, when fishermen are not able to fish, the women resort to buying frozen imported fish to smoke and continue their activities.⁴⁵ The Social Audit reported that the emergency works did not cause any physical or economic displacement, nor did they have a negative livelihood impact on the fishing communities.⁴⁶

64. The Panel spoke with some of the women in Adissem, who mentioned that in periods when the fishermen cannot fish due to stranded pipes or collapsed pipe walls as well as rough sea, their income becomes the sole source of household subsistence, therefore, they resort to buying frozen fish to smoke and sell. The Panel was informed that the practice of buying frozen fish to be smoked and resold existed prior to the installation of the emergency works. However, the women explained to the Panel that they have increasingly relied on frozen fish since the fishermen are going less to the sea due to the pipe walls and due to the smaller catch they bring back when they manage to fish. The women claimed that purchasing of frozen fish is more expensive than buying fresh fish from the fishermen. Therefore, they can afford a smaller quantity of frozen fish. They also claimed that the frozen fish is of poor quality and when sold, it generates less revenue than selling fish smoked that was freshly caught. They informed the Panel that the income generated in such circumstances is less than when the fishermen are able to conduct fishing activities. The Panel also spoke to women in Dévikémé who claimed they are not able to afford the frozen fish and resort to subsistence gardening when fishermen cannot fish.

65. The Panel notes that it repeatedly heard similar testimonies concerning the impact to the livelihoods of women that is likely to be caused by the construction of the groynes. The Panel was told that the *mareyeuses* need to supplement their activities during low catch seasons and this has a negative effect on their livelihoods. They claimed this would also be the case during the construction of the groynes.

b) Implementation of a Grievance Redress Mechanism

66. According to the December 2021 RAP and the Social Audit the GRM was set up at six levels. These include the village or the quartier level as the first level; the *Canton* as the second; the *Commune* and the municipalities of Agbodrafo and Aného as the third; the *Préfecture* as the fourth; the *Région* as fifth; and the Central Complaint Management Committee at the PIU as the

⁴⁵ Social Audit, p. 5; and Executive Summary of the Social Audit, para 5.

⁴⁶ Social Audit, p. 5.

final level.⁴⁷ The Panel was informed that at each level of complaint resolution, committees have five days to acknowledge receipt of the complaint. The complaint must be resolved within a maximum of twenty working days from the date of acknowledgement.⁴⁸ Written complaints are recorded and forwarded in monthly reports to the PIU.⁴⁹ Complainants may file their complainants at any of the six levels of the GRM.

67. According to the Social Audit the complaint registration books are available at various Project locations.⁵⁰ The Social Audit further states that the GRM is known and accessible to the communities of Adissem, Nimagna, Dévikémé and Gbodjomé. However, the Audit stated that the village of Tango did not benefit from specific awareness-raising regarding the existence and places for registration of complaints.⁵¹ The Audit noted that informal complaints concerning the stranded pipes had not been reported to the PIU.⁵² The Audit further noted no complaints had been recorded regarding possible loss of income resulting from a reduction in the fishing activity by the community of Adissem.⁵³

68. The Panel inquired about the GRM in community meetings and with individuals in all the communities visited. The Panel noted that Adissem has a functioning grievance mechanism and the Panel spoke to the representative of the local grievance committee who had reported the three damaged boats. However, the Panel spoke to some of the fishermen and learned that they are not reporting damage caused to boats or nets due to emergency protection works or unpaid wages related to the construction of the concrete pipes. It was not clear to the Panel why community members did not report their grievances. In a community meeting with approximately 40 to 50 people in Dévikémé, the Panel asked about the GRM, but the community was not aware of its existence. The Panel also met approximately 30 to 40 community members in Goumkopé and Kpémé, who claimed they were not aware of the GRM. In the areas where permanent structures are planned, individuals the Panel met with were not aware of the existence of the GRM or its process, nor were they aware of the types of issues they could raise.

69. During its visit, one of the village chiefs claimed he was not aware he is part of the local GRM structure, or the formal role he was expected to play in it. He added that he has still not received any copy of the RAP. The Panel met with other local authorities who had not seen the RAP and requested copies of it. One of the mayor's offices asked whether the Panel could share a copy of the RAP with it. The mayor's office was also not aware of the RAP process or GRM structure. Another mayor's office further along the coast seemed better prepared to respond to the communities' inquiries; it had a complaint box and an officer assigned to the GRM. The Panel spoke to this officer who explained the resettlement process, identification of assets and trees, and grievances received.

⁴⁷ December 2021 RAP, p. 32-33.

⁴⁸ December 2021 RAP, p. 34.

⁴⁹ December 2021 RAP, p. 34.

⁵⁰ Social Audit, p. 13.

⁵¹ Social Audit, p. 13.

⁵² Social Audit, p. 13.

⁵³ Social Audit, p. 9.

c) The Consultation Process

70. The Management Update of the actions committed to in its Response to the Request for Inspection refers to two initiatives to help with community consultation and the disclosure of information: the LACE initiative and a targeted information campaign about the Project.⁵⁴ The information campaign includes objectives and activities within three areas: (i) raising awareness to promote a national debate on coastal zone development challenges; (ii) information sharing to provide facts to communities on the WACA Project, its intervention sites, and the available process of engaging stakeholders; and (iii) positioning WACA as a reliable partner. It specifically aims to ensure that key information is accessible to local communities, in terms of format and language. LACE aims to improve community engagement and feedback under the Project, support information sharing, capacity building and dialogue with civil society and local communities as part of a community-based resilience approach.⁵⁵

71. The Panel inquired with all the communities it met with in both the emergency protection sites and permanent sites, and many had not been informed of any consultations about the Project. Those who participated in consultations, provided the Panel with confusing information about the Project, including basic information, such as: (i) number of groynes, (ii) the location of the groynes, (iii) impact on the individuals, (iv) compensation, and (v) whether they can fish during constructions work. The Panel observed a general lack of awareness of Project details.

72. During the visit, the Panel observed a limited number of signs describing the Project and GRM process in the emergency protection sites. These signs were written in French and not in their local languages. The community members told the Panel that most people in these sites do not speak French and that, mostly, only the younger generation can read and write.

73. In one of the areas the Panel visited, where more than half of the affected households are located (approximately 38 households) the community lacked basic Project information and was unaware of resettlement related details. The members of this community claimed only three houses had been marked by the Project and worried they would have to leave their houses suddenly without any prior warning. In other villages, members of the community claimed many houses are marked but their owners have not yet received any information regarding the Project or their resettlement.

D. The Panel's Review and Conclusion

74. The Panel continues to recognize that the Project is needed and welcomed by the different stakeholders who understand it is critical to addressing the immediate threat they are facing because of the eroding coastline. This point was emphasized by many community members the Panel met with during the mission.

75. The Panel acknowledges the seriousness of the continuing concerns expressed by the Requesters and appreciates the supplemental information received from Management during the May 2022 visit. The Panel also acknowledges Management's continued willingness to provide

⁵⁴ Management Update, p. 5.

⁵⁵ Management Update, p. 4.

information as needed. The Panel thanks all stakeholders for the productive discussions during the visit, as well as the trust placed in the Panel's process.

76. This section provides the Panel's review concerning the three areas of concern raised by the community: a) impact from the emergency protection measures, b) impact from the permanent structures, and c) impact relating to aspects that are common to both activities. In line with its Operating Procedures⁵⁶, the Panel considers whether i) this alleged impact and harm is serious, ii) there is a plausible link between alleged harm and Project and iii) whether Management has dealt appropriately with the issues or has acknowledged non-compliance and presented a statement of remedial actions that address the concerns of the Requesters.

77. In its previous Report the Panel had established that i) the alleged harm is serious and ii) there is a plausible link between alleged harm and Project. In coming to its recommendation, the Panel assessed whether the actions Management committed to appropriately dealt with the concerns of the Requesters. These actions included:

- Completion of the ESIA and RAP;
- Identification and implementation of adequate options to ensure free access to the beach and avoid/limit any interference with both landing and fishing activities that may result from the emergency works;
- Commissioning a Social Audit to assess any unintended impact from the emergency works; Conducting an appraisal of the environmental and social screening of the emergency protection works;
- Supporting a better targeted and more proactive information campaign to stakeholders and local communities regarding coastal zone development challenges in Togo;
- Conducting an implementation support mission in November 2021;
- Piloting the LACE Initiative in Togo that aims to support information sharing, capacity building, and dialogue with local communities as part of a community-based resilience approach by December 31, 2021; and,
- Conducting a mid-term review on or after January 15, 2022, with the ability to make changes to address stakeholders' concerns.

78. **a) Impact from the Emergency Protection Measures.** The Panel notes that concerning the emergency protection works, there appears to be a discrepancy between what the Social Audit has captured and the harms alleged by the affected communities including on the number of fishing villages that the Requesters claim are affected. The impact covered by the Audit appears to be inconsistent with what the Panel was told and shown by the community. For example, this includes the communities' allegations that they are limited in their access to the sea for livelihood purposes as well as safety concerns as a result of the damaged pipe walls.

79. **b) Impact from the Permanent Structures.** Regarding the permanent structures, the Panel notes that the December 2021 RAP, which was shared with COMEX, and based on which agreements are being signed, may not contain the fully updated data. Households who are signing these agreements claim they are unaware of the timeline for the payments and relocation process,

⁵⁶ Inspection Panel Operating Procedures, April 2014.

which is creating uncertainty and has led some to partially dismantle their houses and smokehouses which are their sources of income. The heads of households who signed these agreements informed the Panel that they were unsure whether the amounts paid cover the full scope of impact, including loss of income, adequate valuation of assets and trees, rent, and resettlement assistance.

80. **c) Impact Relating to Aspects that Are Common to Both Activities.** Furthermore, it is unclear to the Panel how the impact claimed by *mareyeuses* that allegedly resulted or may result from both activities (the emergency protection measures and the permanent structures) to the women and community's livelihoods are being addressed. As observed six months ago, the Panel notes that among the affected people there appears to be a lack of general awareness of the GRM and understanding regarding the basic knowledge of the Project.

81. The Panel notes that Management believes the alleged actual harm and potential harm raised in the Request have been addressed through Management's actions; the communities do not agree with this view. Concerning the completion of Management's actions, the Panel notes there are inconsistencies between the Panel's field observations, document review and discussions with the communities and how Management claims the allegations of harm or potential harm have been addressed.

E. Recommendation

82. The Panel acknowledges the positive steps taken by Management to address the concerns raised by the Requesters since the Panel's first Report and Recommendation. The Panel also recognizes the urgency of this Project to Togo and to coastal communities.

83. The Panel notes that, as it has determined in the previous Report and Recommendation, the Requesters and the Request for Inspection meet the technical eligibility criteria set forth in the Panel Resolution. The Panel considers the alleged harm to be plausibly linked to the Project, and that the Request raises important issues of alleged harm and policy non-compliance.

84. Based on its field observations, analysis of available documents, and discussions with various stakeholders, the Panel has remaining concerns about the Bank's compliance with the following policies: Environmental Assessment, OP/BP 4.01, Involuntary Resettlement, OP/BP 4.12, and Investment Project Financing, OP/BP 10.00. Hence, the Panel recommends carrying out an investigation into the alleged issues of harm and related non-compliance.

85. If the Board of Executive Directors concurs with the Panel's recommendation, pursuant to the Panel Resolution,⁵⁷ the Accountability Mechanism Secretary as Head of the Dispute Resolution Service⁵⁸ is required to offer an opportunity for dispute resolution to the Requesters and the Borrower (the "Parties"). If both Parties agree to pursue dispute resolution, the Panel will then hold its compliance process in abeyance until the dispute resolution process is concluded. If

⁵⁷ The World Bank Inspection Panel, September 2020. Resolution No. IDA 2020-0003, paras 29-33.

⁵⁸ The World Bank Accountability Mechanism, September 2020. Resolution No. IDA 2020-0004, para 12 (a): "The Accountability Mechanism Secretary (as head of the Dispute Resolution Service) convenes the Parties to initiate the dispute resolution process. The dispute resolution process will be facilitated by the Dispute Resolution Service to reach a mutually agreed solution between the Parties."

the Accountability Mechanism Secretary informs the Executive Directors that the Parties have reached agreement and signed a Dispute Resolution Agreement, the case shall be considered closed. The Panel shall issue a memorandum closing the case and take no further action with respect to the Request. The Panel will inform the Requesters and Management accordingly. However, if such agreement has not been reached by the Parties within the stipulated period, the Panel will commence its investigation.

Annex A

**UPDATE ON MANAGEMENT ACTIONS
TO ITS RESPONSE TO A REQUEST FOR INSPECTION PANEL REVIEW
OF THE
TOGO, WESTERN AFRICA: WEST AFRICA COASTAL AREAS
RESILIENCE INVESTMENT PROJECT (P162337); ADDITIONAL
FINANCING – WEST AFRICA COASTAL AREAS RESILIENCE
INVESTMENT PROJECT (P176313); GLOBAL ENVIRONMENT
FACILITY (P092289)**

**UPDATE ON MANAGEMENT ACTIONS
TO ITS RESPONSE TO A REQUEST FOR INSPECTION PANEL REVIEW OF THE
TOGO, WESTERN AFRICA: WEST AFRICA COASTAL AREAS RESILIENCE INVESTMENT
PROJECT (P162337); ADDITIONAL FINANCING – WEST AFRICA COASTAL AREAS RESILIENCE
INVESTMENT PROJECT (P176313); GLOBAL ENVIRONMENT FACILITY (P092289)**

April 19, 2022

1. Management is providing an update to its [Response](#) dated October 6, 2021, to the Request for Inspection (RQ21/03) to inform the Board and the Panel of the most recent developments regarding the actions to which Bank Management committed in its Response (paragraph 58).
2. Management has supervised the implementation of the agreed actions closely with the Borrower. The Africa West Regional Vice President and the Country Director visited the sites of the emergency protection measures in October 2021.
3. The Task Team intensified implementation support for the Project, with specific attention to the finalization of the Resettlement Action Plan (RAP) and the Environment and Social Impact Assessment (ESIA), including the conduct of the required stakeholder consultations with Project-affected people. The RAP was finalized and disclosed by the Borrower on February 4, 2022. The ESIA was finalized and disclosed on February 17, 2022.
4. The Task Team, together with the Project Implementation Unit (PIU), increased the number of field visits to Project sites. It visited the sites where the emergency protection works had been undertaken on multiple occasions to review the progress on the work and to verify that fishermen continue to have access to the sea for their fishery activities.
5. The Table below, together with associated annexes, provides an update on the four actions: the *Social Audit*, the *Boat Landing*, the *Local Action and Community Engagement*, and the *Information Campaign*.

Table with Status of Agreed Actions

No.	Actions as listed in the WB Management Response	Status
1	<p>Social audit. As the emergency works under Component 3 are nearing completion, the Bank will commission a social audit to assess any unintended impacts that may have resulted from the temporary access restrictions during the emergency construction works. The audit will be completed and shared with the PIU by March 1, 2022, and will help identify unintended impacts that may require compensation.</p>	<p>The Bank engaged a fisheries expert and a social development expert in January 2022 to prepare the Social Audit for the emergency works. Following a briefing by the Task Team, the two experts undertook a desk review, a field visit to the emergency construction sites in the segment between Gbodjomé and Agbodrafo (January 21-31, 2022), and consultations with communities, local authorities, and stakeholders in the areas where the works took place (see Annex 1)</p> <p>Regarding fishing practices and boats, the Social Audit confirmed that out of the six emergency construction sites, only two (<i>Adissem</i> and <i>Tango</i>) have fishing activity. This is consistent with the findings of the Bank missions in 2020, which identified <i>Adissem</i> and <i>Tango</i> as the two fishing villages in need of emergency protection against coastal erosion. In these villages, two kinds of fishing boats are used: (i) 20-m motorized boats, propelled by 40-hp outboard motors, for seine fishing of small pelagic fish (sardines), which require 16-18 persons on board; and (ii) boats of 6 to 15 m in length, non-motorized, for gillnet fishing of bottom fish (croaker and sea bass), requiring 3-4 persons on board. Fishing is done primarily at night.</p> <p>At the time of the Social Audit, the following was noted: in <i>Adissem</i>, 22 boats were counted (9 motorized and 13 non-motorized), of which 7 were anchored at sea; in <i>Tango</i>, 8 non-motorized boats were counted, and all were stored on the beach. Both communities said that beach-based seine fishing practice has been nearly completely abandoned, due to rocks on the seabed exposed by coastal erosion that occurred before the Project, and which damage the fishing nets. All fish caught is transferred to women fishmongers, who engage in its trade or processing.</p> <p>The Social Audit concluded the following:</p> <ol style="list-style-type: none"> 1. The emergency protection works have been completed at five of the six sites (see Annex 2) and are still being finalized in <i>Adissem</i>. 2. <u>The emergency protection works have not caused physical or economic displacement and have not negatively impacted the livelihoods of community fishermen.</u> The communities expressed their support for the emergency works. 3. The contractor employed local villagers for the labor-intensive works, and this was well received by the communities.

No.	Actions as listed in the WB Management Response	Status
		<p>4. The safeguards due diligence, carried out in March 2020 prior to construction, was adequate and measures were taken to reduce the temporary disturbance of fisheries activities.</p> <p>5. The safeguards due diligence did not, however, anticipate and therefore did not fully address the potential risk from pipes (used for protection works, see Picture1) being broken by waves on the sites during construction. The risk of fishing boats colliding with the pipes was also not anticipated.</p> <p>6. There was no health and safety committee on the construction sites as was recommended in the environmental and social screening, and Covid-19 protocols had only been partly integrated (although not foreseen during the selection process, given that it pre-dated the pandemic). In lieu of the committee, a Health and Safety Expert was hired by the contractor to oversee health and safety aspects of the emergency works.</p> <p>7. The Grievance Redress Mechanism (GRM) is known to and accessible by communities in <i>Adissem</i> as well as other concerned villages (Nimagna, Dévikinmé 1 and Dévikinmé 2 and Gbodjomé). However, the village of <i>Tango</i> (also known as Tango Copé by some stakeholders) had not been advised specifically about the existence of a place to register complaints.</p> <p>Social Audit recommendations and follow up action by the Project: The Social Audit was shared with the PIU on March 15, 2022. Its findings and recommendations were discussed and agreed with the PIU, and there is a timebound plan for the actions, summarized as follows: (i) to address incidents of damage to fishing boats presumed to have been caused by the broken pipes (one incident was known at the time of the Social Audit); (ii) to mitigate the risk of accidents that could be caused by removing broken pipes and posting signage about them that is visible day and night from land and sea; (iii) to develop a “Maintenance Management Plan” to be implemented by the PIU to ensure that the emergency structures are properly maintained and health and safety measures are observed (a draft was received in April 2022); and (iv) to ensure that the GRM is accessible and efficient (particularly in Tango) by providing training to grievance committees undertaking community information and outreach to enable equitable and transparent access to the GRM.¹ Information would be in a language, form, and location that will ensure full awareness by communities.</p>



¹ As of April 11, 2022, Grievance Committees (GCs) exist in each of the six sites. The Focal Point of the GC reports complaints to the Project GRM, managed by the PIU Social Development Specialist.

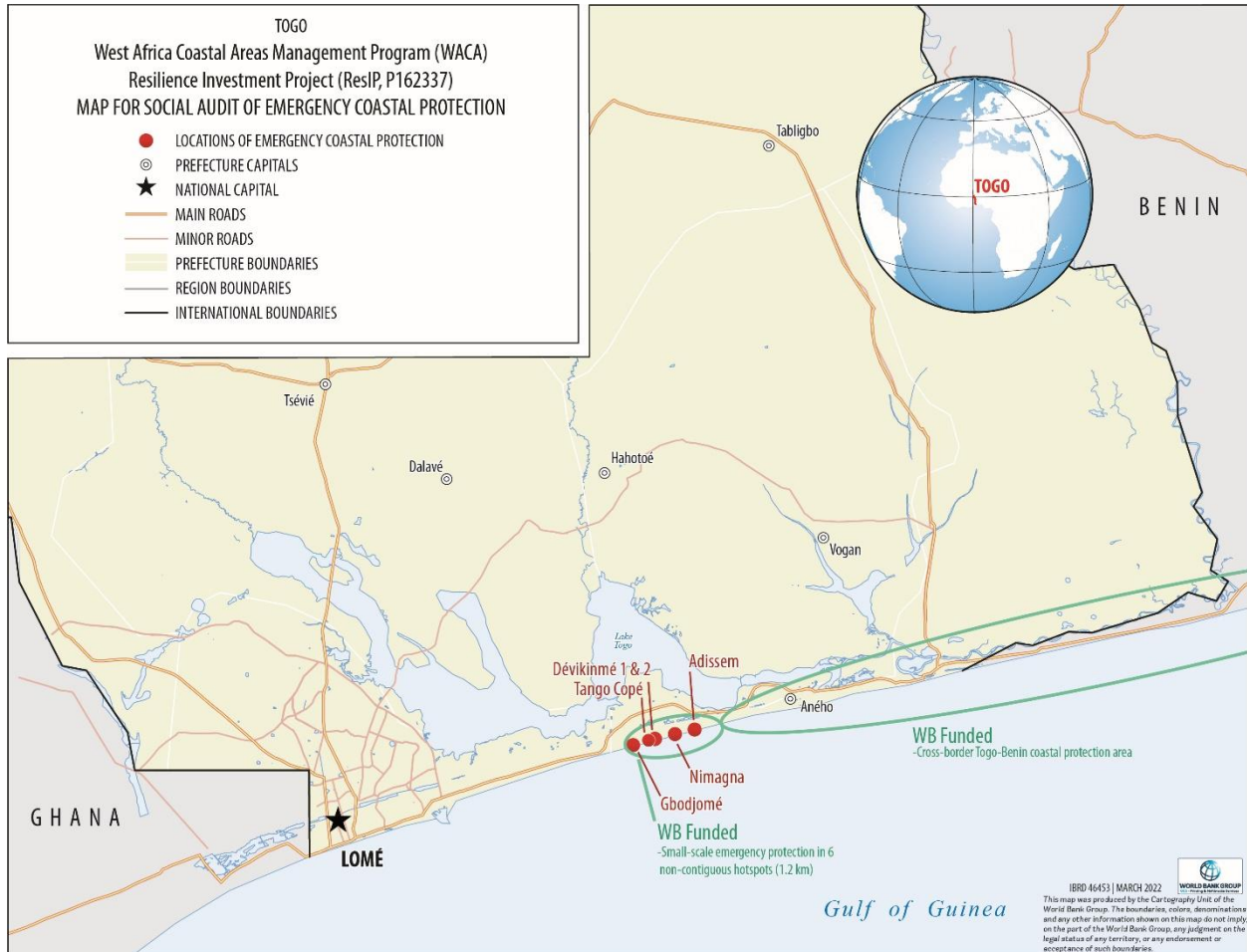
No.	Actions as listed in the WB Management Response	Status
2	<p>Boat landing. The Bank will work with the PIU, contractors, and local communities to identify and implement by December 31, 2021 adequate options that will ensure free access to the beach and avoid/limit any interference with boat landing and fishing activities, which may result from the Project’s civil works.</p>	<p>The Task Team supported the PIU, contractor, and local communities between September and December 2021 in identifying and implementing access corridors in Adissem to facilitate landing of fishing boats (for maintenance as per their practice). <i>Adissem</i> was the only site where local communities needed an alternative boat landing site because the emergency protection structure in Adissem is 500 m long (whereas in other sites, the length of the protection structure varies between 120 m and 202 m, and therefore allows for boat landings on other parts of the beach).</p> <p>The establishment of two corridors (of 50 m each) within the 500-meter emergency coastal protection in Adissem was completed before December 31, 2021 (Annex 3).</p> <p>The eastern corridor is currently stable. However, the western corridor suffered damage after construction on November 5, 2021, because of its location on a high-energy coast subject to powerful waves and where the rate of sand erosion exceeds the rate of sand deposition. The western corridor was stabilized by the contractor by adjusting the position of the pipes and rebuilding the structure where it was damaged. Nevertheless, the communities expressed to the Social Audit experts that they were satisfied with the establishment of the corridors.</p> <p>Given the high vulnerability of the coastline, there is a need for continued management and repair of structures. To this end, the Task Team is following up closely with the PIU to ensure that the “Maintenance Management Plan” (mentioned above) is developed by the end of May, 2022, and implemented for the duration needed. The Maintenance Management Plan will include requirements to check for broken pipes and confirm safety signage stays in place; it will also include Covid and other requirements for workers. The PIU will continue its frequent field visits to monitor and confirm that the implementation of the “Maintenance Management Plan” is adequate, including its provisions for health, safety and environmental precautions.</p>
3	<p>Piloting the Local Action and Citizen Engagement (LACE) Initiative in Togo. LACE aims to support information sharing, capacity building and dialogue with civil society and local communities as part of a community-based resilience approach. LACE activities are currently being defined in collaboration with a network of regional and local NGOs. In Togo, activities include: (i) providing information on coastal development challenges, on the WACA</p>	<p>The objective of LACE is to engage with civil society organizations (CSOs) and community-based organizations (CBOs) to strengthen coastal resilience in West Africa. This includes national and regional level activities to systematize participatory planning and decision-making around coastal resource management; use and build the capacities of CSOs and CBOs; institutionalize citizen engagement in coastal resource management by establishing and/or strengthening links between citizens and local government; and foster knowledge exchange and learning across countries.</p> <p>Complementing the <i>Social Audit</i> (above) and the <i>Information Campaign</i> (below), <u>the objective of the LACE pilot in Togo is to improve community engagement and feedback under the Project.</u> A Bank-hired consultant was engaged to prepare the workplan. The Consultant visited Togo from December 8-22, 2021 and undertook field visits to solicit views from communities and CSOs. Focus groups were conducted</p>

No.	Actions as listed in the WB Management Response	Status
	<p>program itself, and on the role stakeholders can play to help protect their coastline; (ii) providing capacity building to local NGOs to work with communities to help them find solutions to challenges affecting their livelihoods; and (iii) facilitating dialogue between civil society and citizens on partnerships for resilience and livelihoods. A consultant will be recruited to prepare a workplan for the LACE Initiative, which will provide for community consultations to identify priority activities and interventions. The workplan will be submitted by December 31, 2021.</p>	<p>(photos in Annex 4) with men and women in six locations targeted under the Project: Agbodrafo, Gbodjomé, Adissem, Djekin, Kpeme and Follygah (map in Annex 5). The objectives of the LACE Initiative and purpose of data collection were explained during the focus groups, including the confidential and voluntary nature of the discussions, and that there was no direct financial reward for participation. The focus was on listening to communities to identify their ideas on how to address their concerns and protect their livelihoods. Interviews were also conducted with six CSOs engaged in coastal development activities in these communities, who were identified in consultation with the Task Team.</p> <p>Based on the field visit, the various consultations with communities and CSOs, and the data, views and ideas collected, the workplan for the Task Team developed by the Consultant can be summarized as follows: (i) support the PIU to strengthen information sharing through activities which solicit citizen feedback, inform communities about the feedback received and action taken, and tailor communications to vulnerable groups; (ii) support the PIU to develop a participatory approach to ensure that communities' views are reflected in the selection of social sub-projects (to be implemented under the Project); and (iii) conduct a Bank-facilitated learning and exchange workshop with Togolese CSOs and stakeholders for citizen engagement on coastal resource management in Togo.</p> <p>The next step is to engage the PIU, CSOs, and communities to implement the workplan. Exact dates for implementation will depend on the specific actions identified for the workplan. Some activities will be of a longer-term nature.</p>
4	<p><i>Supporting the Government to implement a better targeted and more proactive Information Campaign</i> for stakeholders and local communities regarding coastal zone development challenges in Togo. This will specifically aim at ensuring that the following key information is accessible to local communities, in terms of format and language: (i) results of the <i>2020 State of the Coast Report</i>, and the <i>2021 WACA Compendium of Solutions</i>; and (ii) information regarding engagement processes as part of the RAP consultations, and the grievance redress mechanism.</p>	<p>In December 2021, the Task Team assisted the PIU in updating the Project's communications strategy by incorporating a targeted <i>Information Campaign</i>.</p> <p>The <i>Information Campaign</i> includes objectives and activities within three areas: (i) awareness – to promote a national debate on coastal zone development challenges; (ii) information – to provide facts to communities on the WACA Project, its intervention sites, and the available process of engaging stakeholders; and (iii) positioning – to promote WACA as a reliable partner. For each area, the campaign established a diagnostic, identified stakeholders and possible champions, defined key messages, mapped communication channels, and established an operational plan.</p> <p>The activities for the <i>Information Campaign</i> were included in the PIU's Annual Workplan and Budget, to which the Bank gave its no-objection in January 2022. The findings from recent analytical work such as the <i>2020 State of the Coast Report</i>, and the <i>2021 WACA Compendium of Solutions</i>, will be used to ground truth the campaign, and to identify themes to be discussed.</p> <p>From February 14 to 21, 2022, an implementation support mission was undertaken to assist the Government in launching the <i>Information</i></p>

No.	Actions as listed in the WB Management Response	Status
	<p>The Bank will: (i) provide additional implementation support for community engagement and social communication activities to the PIU; (ii) ensure that communications activities continue to be adequately budgeted for in the Project’s annual workplan; and (iii) support the PIU to develop user-friendly and accessible information materials for the grievance mechanism. These activities will be included in the annual workplan by December 31, 2021.</p>	<p>Campaign. The inaugural activity was a first broadcast of the Coastal Radio in Togo (<i>Radio du Littoral</i>), hosted by the communities in Aneho and featuring the Mayor of Aneho, to present the WACA Project and its role in building coastal resilience (see Annex 6). Subsequent monthly shows will: (i) involve communities and key stakeholders to discuss coastal degradation themes (derived from the <i>2020 State of Coast Report</i>); (ii) provide updates on the implementation of WACA specific activities; and (iii) discuss approaches proposed by the <i>WACA Compendium of Solutions</i>. Media partners (such as radio hosts) are used as a third-party voice (that is, other than the Bank or the Borrower) to present these thematic shows.</p> <p>On February 18, 2022, a meeting was held with development partners,² which resulted in an agreement to work on harmonizing messaging in support of coastal resilience.</p> <p>On March 25, 2022, the second show of the Coastal Radio was broadcast (see Annex 7), focusing on coastal flooding, informed by the issues described in the <i>2020 State of Coast Report</i>.</p> <p>The next step is to continue Bank implementation support for the Information Campaign to improve communities’ understanding of coastal degradation issues and the Project’s objectives and activities. <i>Radio du Littoral</i> will be moving from community to community, using mostly local languages to ensure a good participation of community members.</p>

² African Development Bank, Agence Française de Développement, Islamic Development Bank, World Bank.

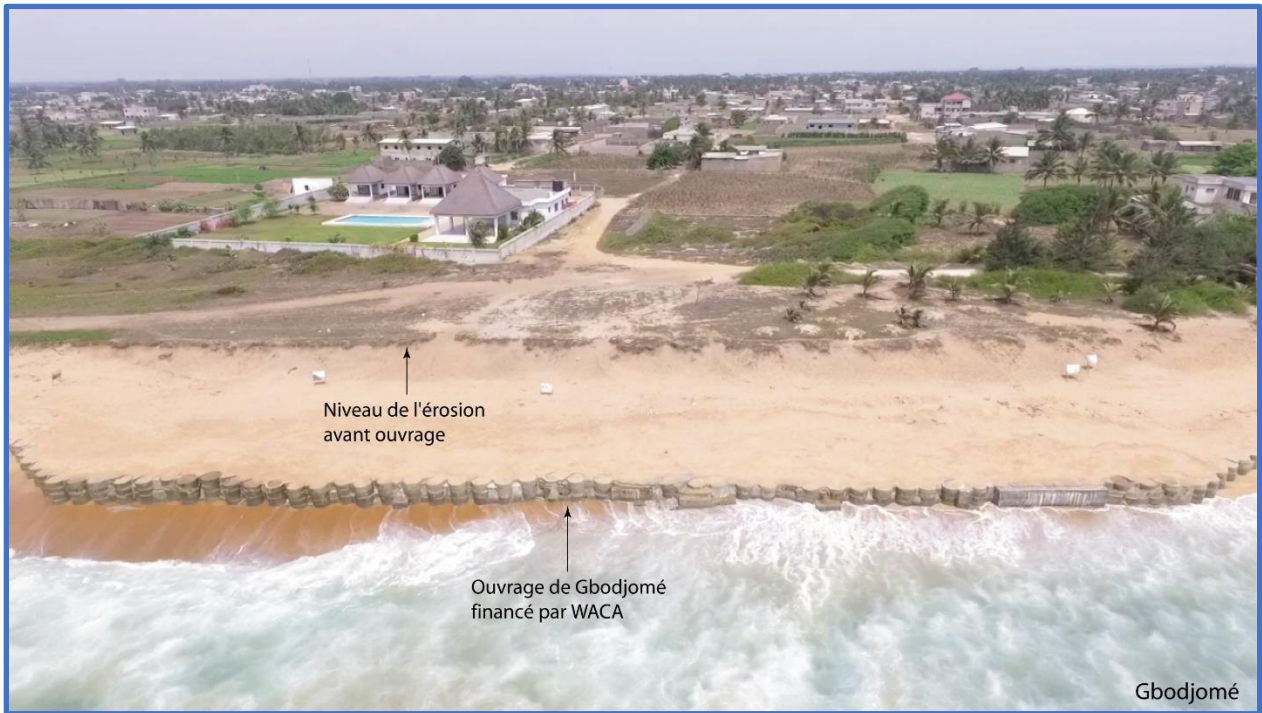
Annex 1: Map of Social Audit Sites



Annex 2: Drone Photos from Emergency Works Sites (February 24, 2022)

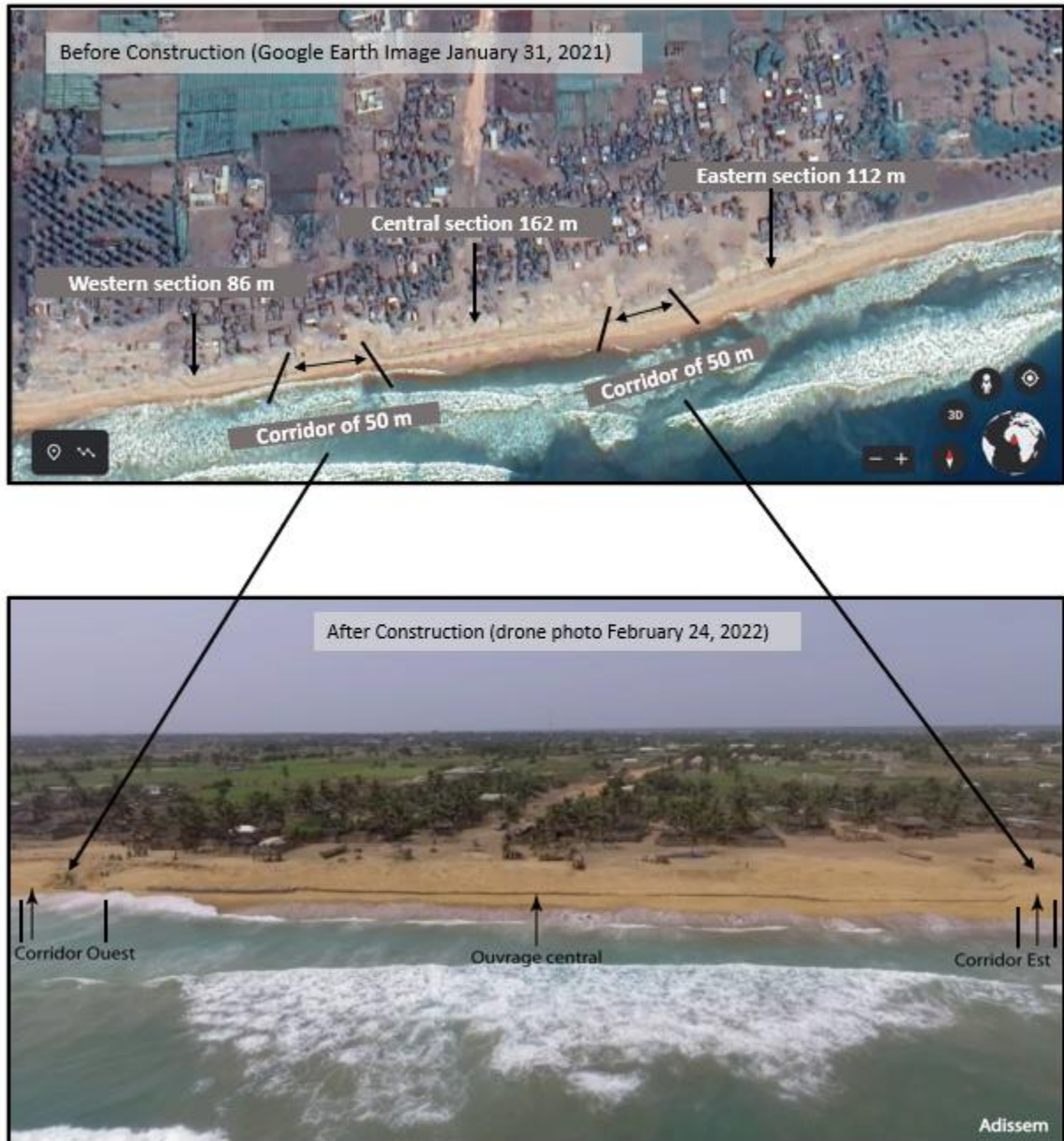


Tango Cope





Annex 3: Photo of Boat Landing Corridors in Adissem



Annex 4: Photos from LACE Consultations

The Inspection Panel redacted the picture in order to protect the privacy of the participants in the consultations

Consultations on citizen engagement in Kpeme on December 16, 2021

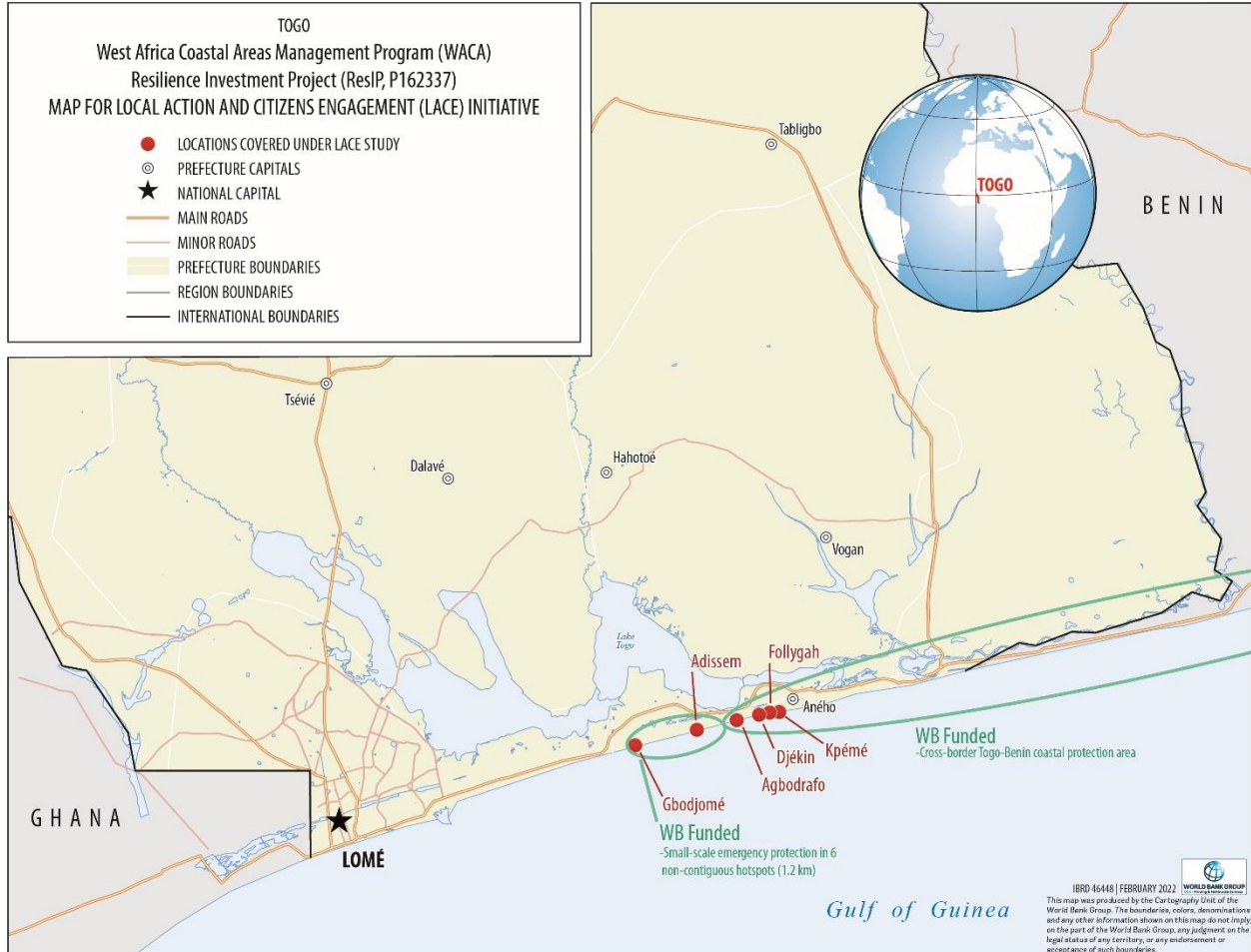
The Inspection Panel redacted the picture in order to protect the privacy of the participants in the consultations

Consultations on citizen engagement in Adissem on December 21, 2021

The Inspection Panel redacted the picture in order to protect the privacy of the participants in the consultations

Consultations on citizen engagement in Agbodrafo on December 14, 2021

Annex 5: Map of LACE Initiative Consultations



Annex 6: Launch of the Coastal Radio, February 18, 2022



Publicly available video from the launch of the Coastal Radio in Togo <https://youtu.be/BC-OkpOgsMw>

The Inspection Panel redacted the picture in order protect the privacy of the participants in the radio broadcast

Media partners moderate the Coastal Radio show, which was broadcast simultaneously on six radio stations, covering the entire country. Aneho, Togo, February 18, 2021.



Maitre Alexis Aquereburu, Mayor of Aného, opens the radio with these words: “WACA came to reconcile us with the sea. A sea that once was our friend, the salt of our lives but has become our enemy, eating our homes, our lands, and our livelihoods”. Aneho, Togo, February 18, 2021.

The Inspection Panel redacted the picture and name of the Women’s Leader in order to protect their privacy

Ms., “Women’s Leader”, sharing her experience on women’s engagement. Aneho, Togo, February 18, 2021.

The Inspection Panel redacted the picture in order to protect the privacy of the member of the community

A member of the community asking questions about WACA interventions. Aneho, Togo, February 18, 2021.

Annex 7: Coastal Radio, March 25, 2022

The Inspection Panel redacted the picture in order to protect the privacy of the participants in the radio broadcast

Second Coastal Radio broadcast focusing on coastal flooding, recorded in the village of Edoh Wokui Kope on March 25, 2022 (Photo by TecnoPova)

The Inspection Panel redacted the picture in order to protect the privacy of the participants in the radio broadcast

Second Coastal Radio broadcast focusing on coastal flooding, recorded in the village of Edoh Wokui Kope on March 25, 2022. The event was well attended by representatives of stakeholder groups in the community (Photo by TecnoPova)

The Inspection Panel redacted the picture in order to protect the privacy of the participants in the radio broadcast

Second Costal Radio broadcast focusing on coastal flooding, recorded in the village of Edoh Wokui Kope on March 25, 2022 (Photo by TecnoPova)

The Inspection Panel redacted the picture in order to protect the privacy of the participants in the radio broadcast

Second Costal Radio broadcast focusing on coastal flooding, recorded in the village of Edoh Wokui Kope on March 25, 2022. In these photos, members of the community intervene during the show to share their views and experience with the Project's activities in their localities (Photo by TecnoPova)

Annex B

SOCIAL AUDIT OF THE EMERGENCY PROTECTION SUB-PROJECT

Togo

**West Africa Coastal Areas Management Program (WACA)
Resilience Investment Project (ResIP, P162337)**

SOCIAL AUDIT OF THE EMERGENCY PROTECTION SUB-PROJECT

Report of the social audit mission

**██████████ environmental and social specialist
██████████, expert in fisheries management**

15 April 2022

Executive Summary

1. **This report includes the analyses and findings of two independent experts recruited by the World Bank** to undertake a social audit mission that included a desk review of the available documents as well as information gathered during site visits and interviews with representatives of the project's stakeholders between January 24-31, 2022.
2. **The emergency protection works are an experimental solution designed by Togolese engineers and tested for the first time at the Gbodjomé site in 2015.** In summary, the emergency protection works consist of sunk-in concrete pipes anchored to bedrock in the upper part of the beach, in stretches varying from 100 to 500 m, depending on the site. These works are still an experimental solution and do not constitute a long-term solution as their sustainability over time has not yet been tested. However, they do represent a good cost-effective option to provide immediate coastal protection pending the construction of rock groynes, which represent the long-term sustainable solution that will be implemented by the WACA-ResIP project.
3. **Out of the six sites selected for the construction of emergency protection works, only two sites (Adissem et Tango) are occupied by fishing communities.** The social audit mission observed twenty-two artisanal fishing boats in Adissem, including nine motorized boats with a length of approximately 20 m and thirteen non-motorized boats, ranging in overall length from 6 m to 14 m. In the village of Tango, there are eight non-motorized boats ranging in overall length from 6 m to 14 m. The fish caught by the fishermen are sold to female entrepreneurs that will sell them as is (fresh) or smoked in order to extend their shelf life.
4. **During the field visit, emergency protection works were considered complete in five out of the six sites; they are still under construction in Adissem.** The delay in the works in Adissem is due to oceanographic hazards that destroyed the western part of the already built works without however affecting the eastern part of the works, and precipitated part of pipe segments to be installed into the foreshore.
5. **The main finding of the mission is that the emergency works did not cause any physical or economic displacement, nor did they have a negative livelihood impact on the fishing communities.** In Adissem, the creation of two 50-meter corridors between the concrete pipe wall at the request of and at the locations specified by the fishermen's representatives, allowed the continuity of all fishing activities. At the request of the fishermen, measures were also taken so that the construction site installations do not encroach on the areas reserved for storing boats. In Tango, fishermen moved their boat parking spot approximately 100 m away from the emergency protection works without inconvenience. Overall, the village population confirmed their satisfaction with the works, and the Adissem population also requested an extension of the works to protect the cemetery adjacent to the village.

6. **The contractor in charge of the works gave priority to the employment of the local population by opting for labor-intensive construction methods.** According to the data received from the PIU, the construction works provided temporary jobs to 289 persons, including 161 men (56%) and 128 women (44%), with total paid salaries between May 2021 and January 2022 of approximately US\$ 265,000. The construction works also benefited local suppliers of construction goods and services (manufacturing of pipes, transportation of material).

7. **The experts agree that the safeguard measures identified prior to the start of the construction of the emergency works were appropriate and were in general implemented satisfactorily. In particular, these measures** mitigated any impacts related to a temporary disruption of fishing activities by creating corridors between the works that enabled access to the sea and by freeing up new parking/storage spaces. Regular monitoring of the livelihoods of impacted fishermen during construction works was not undertaken regularly but weekly supervision missions by the World Bank team based in Togo have allowed for this kind of engagement. The mission recommends that the PIU be in charge of the monitoring with a monitoring plan including the relevant consultations and indicators.

8. **However, the safeguard measures did not include measures mitigating the dangerousness of the sites during the works due to: i) pipe segments stranded on the foreshore; and ii) the risk of collision between the boats and the installed pipe wall.** Regarding the first point: i) the explanation is that the loss/movement of pipe segments already installed on the foreshore was caused by unexpected oceanographic hazards and was not anticipated. According to the Adissem fishing community, there was one accident that they say were related to the construction works. The accident concerned a damaged boat for which a mediation report had been prepared with the PIU and for which the repair had not been done at the time of the Social Audit. There has been one minor incidence where two swimmers hit a pipe segment, and which had not been reported. In terms of collisions between the boats and the installed pipes on the shore, there have not been any such incidence reported in either Adissem, Tango or any other sites. It is worth mentioning that in terms of the loss/movement of pipe segments, mitigation measures were quickly implemented in Adissem to include the removal of the lost segments with the contractor's excavator, but this was done only partially at the time of the field mission, given the alleged existence of 676 pipe segments on the shore.

9. **The Grievance Redress Mechanism (GRM)** is known, operational and available to the Adissem communities as well as the targeted villages of Nimagna, Dévikémè 1 and Dévikémè 2 and Gbodjomé. However, the village of Tango did not receive a specific information campaign regarding the details including the existence and place for registration of complaints. The audit consultants recommend a much wider dissemination campaign regarding the GRM process, easy and simplified access for the communities with a close monitoring by the PIU, as well as an

awareness campaign intended to the beneficiary communities to ensure their satisfaction and improve access to the GRM.

10. **The mission was unable to confirm that there is a functional health and- safety committee on the work sites.** They did observe that Covid-19 protocols were only partially being integrated. The social audit experts were informed that, instead of establishing the health and safety committee in the village, the contractor recruited a Health, Safety and Environment (HSE) specialist. Going forward the mission recommended to put in place a grievance committee to which reporting on health and safety issues can be reported and connected to the GRM system.

11. **The mission's main recommendations are the following:** i) **commit to the repair of the** damage caused to one boat by referring the case to the GRM; ii) **the mitigation of risks caused by the emergency protection works** that include removal of the pipe segments stranded on the foreshore, signaling the existence of the works so that they are visible day and night from land and sea, implementation of a response mechanism in case of damage caused to the pipe walls after completion of the works; iii) **improvement of the implementation of the Health, Safety and Environment measures** at the sites still in progress; and iv) a more proactive **awareness and dissemination campaign to improve the local communities access to the GRM** within the scope of the coastal protection program.

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1 Introduction

Emergency protection works were implemented in six sites - Gbodjomé, Tango, Dévikinmé 1 and 2, Nimanga and Adissem - along the Togolese coast under Component 3 of the WACA ResIP project. This component aims to protect vulnerable areas against coastal erosion and flooding, supporting pollution control and waste management operations, and promoting climate-resilient coastal development.

Within this scope, small-scale emergency coastal protection measures (also referred to as “faux puits de Gbodjomé”, or “false wells of Gbodjomé”) were undertaken in six hotspots totaling 1.2 km between Gbodjomé and Adissem sites (see Annex 1 for the surface area of the construction works in each site). These emergency coastal protection measures consist of precast concrete pipes (approximately 150 cm in diameter and 50 cm in height) that are installed upright on the beach, hence the resemblance to “wells”, in stretches varying from 80 to 500 m, anchored to bedrock and filled with sand. They are intended to help retain beach sand behind the pipes and provide short-term protection to homes and assets against wave related erosion in areas that are subject to significant erosion, until longer-term protective measures, such as groynes and beach nourishment, can be put in place. The “faux puits” are still an experimental solution and do not constitute a long-term solution as their sustainability over time has not yet been tested. However, they do represent a good cost effectiveness option to provide immediate coastal protection while waiting for the construction of the rock groynes, which represent the longer-term solutions that will be financed by the WACA-ResIP project.

The social audit mission’s general objective was to review the social mitigation measures implemented during the implementation of the emergency protections works in the six (06) sites and assess the impacts on the livelihoods of the project-affected persons. More specifically, the Terms of Reference for the social audit were to:

- Appraise the relevance of the initial environmental and social risks and impact screening implemented prior to the start of the emergency coastal protection works;
- Identify all the unforeseen negative impacts such as beach access restrictions and possible loss of land and non-land assets and livelihoods directly linked to the installation of concrete pipes;
- Recommend, if necessary, possible mitigation measures and sub-social projects that may be financed in order to improve the living conditions of the fishing communities in the area covered by the project.

This social audit report is divided into the following six (06) sections: (i) methodology; (ii) overview of the fisheries sector and an appraisal of the social impacts of the emergency protection measures on the fisherfolk; (iii) the Grievance Mechanism (GM); (iv) health-safety-environment on

the sites; (v) analysis of the institutional framework; and (vi) the mission's findings and recommendations.

2 Methodology

The social audit was conducted by two experts recruited directly by the World Bank: one national social development and safeguard specialist¹ and one international expert in artisanal fishing.²

The methodological approach implemented by the mission is based on a desk review. The main documents reviewed included: the initial environmental and social screening report and the project safeguard instruments, the World Bank mission reports, the weekly monitoring reports of the Project Implementation Unit (PIU) and other documents related to the execution of the construction of the emergency protection works, including monitoring reports prepared by the monitoring firm, World Bank Management Response to the request for inspection (MR) and the Eligibility Report (ER) of the World Bank's Inspection Panel, the records of complaints and the minutes of the training and implementation of the Grievance Mechanism (GM) for the areas covered by the emergency protection works and other information deemed relevant.

Parallel to the desk review, the mission complemented the written information by conducting group and individual interviews with the concerned communities, with a focus on the fishermen/fish wholesalers of Adissem and Tango, in order to obtain the information necessary for the verification of the project implementation process, community participation, level of allocation of the project activities to the local population, the GM, the health-safety-environmental measures, the compliance with Covid-19 measures, etc. Interviews were also conducted with the Project Implementation Unit (PIU), the contractor, the monitoring firm and the workers. The schedule of the activities of the social audit mission is provided in Annex 2.

3 The fisheries sector in the areas covered by the emergency protection sub-project

3.1 The fishing sites in the areas covered by the emergency protection sub-project

The field visit conducted during the social audit mission allowed the social audit consultants to observe that out of the six sites selected for the construction project of temporary emergency

¹ [REDACTED]
² [REDACTED]

protection works, two are fishing villages with visible fishing boats nearby: Adissem and Tango. The four other sites selected for the construction of the emergency works did not have any active fishing activities at the time of the field visit: Nimanga, Devikinmé 1³, Devikinmé 2 and Gbodjomé. This is consistent with the site selection report drafted by the PIU in March 2020 identifying Adissem and Tango fishing villages as heavily threatened by coastal erosion and in urgent need of temporary protection by a line of “faux puits” of 450 m and 190 m on the coast, respectively (see Annex 1). For the four other selected sites⁴, private assets were identified as threatened elements that needed protection.

The six sites chosen for the emergency coastal protection works were selected according to agreed criteria, including the identification of areas under strong sea swell pressure/high erosion threat, the capacity of the works to limit coastal erosion, and as a first step, a request from the threatened communities to the local administrative authorities. The site selection was confirmed during site visits by a delegation made up of local and governmental authorities and then with the participation of local beneficiary communities.

3.2 Contextual elements: Fishing activities in Adissem and Tango

Fishing boats seen during the mission were small open boats. They were of two distinct types:

- Boats mainly used to catch small pelagic fish (sardines, etc.) by using the *senne tournante* fishing technique. These are boats of about 20 m length, propelled by outboard motors with an average power of 40 HP. The boat crew includes 16 to 18 persons.
- And boats mainly used to catch groundfish species (sea bass, meagre) and small pelagic fish by using *filet maillant* fishing technique. The size of these boats ranges between 6 m for the smallest and 15 m for the biggest. This type of boats seen in Adissem and Tango are non-motorized boats. The crew is composed of 3 to 4 persons.

³ Three small boats were seen at the upper beach side at the Western border of Dévikinmé 1, but they actually belong to fisherman from Tango neighboring village.

⁴ The initial selection included three other sites around Agbodrafo (family houses, church and cemetery). The three sites were not covered by the emergency works because they were included in the WACA ResIP transboundary coastal protection infrastructure Togo-Benin sub-project.



Adissem : Big boat used in the *senne tournante* fishing technique (in technical stop)



Tango : Small boats used in the *filet maillant* fishing technique

According to the information gathered during the interviews with the fishermen, fishing takes place mainly at night, with fishing trips starting in the evening or during the night and returning in the morning.

The count of these boats during the field visit, cross-checked with the information provided by the concerned fishing communities, made it possible to confirm that the boat fleet existing in the two sites covered by the emergency works is composed as follows:

- In Adissem, a total of twenty-two boats including nine (09) motorized boats used in the *senne tournante* fishing technique and thirteen (13) non-motorized boats used in the *filet maillant* fishing technique;
- In Tango, eight (08) boats, all non-motorized used in the *filet maillant* fishing technique.

During the field visit to the Adissem site, seven (07) boats were anchored at sea beyond the wavebreak area, without crew on board. The other boats were on shore. Anchoring at sea is a normal storing practice for active boats as it avoids the dangers of crossing the wave sand bar and avoids encounters with the rocky areas (the "beach-rock") uncovered by the erosion process prior to the emergency works. The fishermen reach the boats by swimming and unload the catches also by swimming and pulling the containers containing the catches through the water to the shore. The boats are brought ashore for maintenance when sea conditions permit. The other boats seen in Adissem were stranded at the top of the beach. The vast majority of these stranded boats seemed to be in a seaworthy condition with fishing gear ready for use, although one or two boats were old wrecks.

At the Tango site, all the boats were stored ashore on the upper beach. They also seemed to be seaworthy with fishing gears ready for use. No wrecked boats were seen in Tango.

Both fishing communities also reported the use of beach seines in the types of fishing they employ in addition to boat fishing at sea. However, this practice has been abandoned since coastal erosion, especially prior to the emergency works, resulted in rocky underwater areas where nets get stuck or torn.

The fish haul landed by the boats are sold or processed by fish wholesaler women. According to the information gathered during the interviews, the fish may be sold fresh to the surrounding villages or to buyers who come to pick them up when the boats are unloaded or fish are smoked and then resold on the local market. Part of the fish harvest is also consumed by the villagers.

In Adissem and Tango, individual fish smokehouses are installed at the homes of their owners. There are no communal smoking facilities. Fish smoking involves about fifteen households in Adissem and two in Tango. In addition, fish wholesaler women have benefited from a project financed by the African Development Bank for the construction of improved smokehouses. When the fishermen do not go to sea, the women can smoke fish bought from frozen fish importers (refrigerators) to continue their activities.⁵



Adissem: fish placed on racks before smoking



Adissem: fish smoking kiln in operation

3.3 The situation of the emergency works in Adissem and Tango

Remark: The works history summarized below has been reconstructed based on the information included in the minutes of the weekly supervision missions conducted by the World Bank and was complimented with the discussions with the concerned parties during the social audit mission.

3.3.1 Adissem

⁵ During our visit, the fish being smoked was frozen sardines imported from Mexico (bought in Lomé)

The construction of the emergency works in Adissem started with the installation of the first pipe linear wall. The first set of works were interrupted in May 2021 due to unfavorable swell conditions; only 19% of the pipe wall was completed. An exceptional tide damaged the first section and significantly eroded the dune, pushing hundreds of pipes into the foreshore that were then stored there pending their installation.

As a result, in September 2021, it was decided to entirely rebuild the pipe wall 10 m higher up the dune than the first one in order to ensure longer term sustainability of the works.

At the beginning of the construction of the new pipe wall in September 2021, the fishing community of Adissem made requests to the contractor for: i) the creation of corridors in the pipe wall to allow boats to pass; ii) the removal of the stored material blocking the passage to allow direct access to the sea; and iii) the removal of pipes stranded on the foreshore. Following these requests duly registered by the PIU, a meeting was organized on September 13, 2021 between the PIU, the contractor, and the works supervision firm on the one hand, and the representatives of Adissem fishermen on the other. The minutes of the meeting includes an agreement between the parties for the creation of two 50 m wide corridors free of stored pipes, with the locations of these two 50 m corridors identified on the ground by laying milestones in consultation with the concerned fishermen (one on the part of the wall called Kopévi, the other on the part called Kopégan). Concerning the other requests from the fishermen: the pipe segments stored on the dune were moved in order to allow access to the beach/boat passage and a certain proportion of the pipe segments making up the destroyed first part of the wall and those that were pushed into the foreshore were removed, but some pipes already partially or completely sanded up could not be removed and they remain and are not considered a major obstruction.

Construction works continued and were deemed substantially completed on January 15, 2022, subject to site clean-up and removal of remaining pipes and other material. However, on January 22, 2022, strong waves from an exceptional “new” tide damaged the western part of the new Adissem works with a few pipes from the existing wall falling into the sea and the erosion resulting from this damage also uncovered pipes that were damaged during the exceptional tide of May 2021. The eastern section of the Adissem works was not affected by this new exceptional tide.

In conclusion, the implementation of the temporary emergency measures that were reviewed during the visit to the Adissem site between January 25 and 28, 2022, within the scope of the social audit mission can be summarized as follows:

- The eastern part of the pipe wall, including the 50 m corridor, is in good condition with unhindered access, allowing in particular the use of the corridor for the passage of people and boats from the beach to the sea;
- The western part of the wall is damaged, including the 50 m corridor, the use of which is made difficult by the cliff profile on which it is situated, and the pipe segments stranded in the corridor;

- Stranded pipes are visible on the right foreshore of the central part of the pipe wall and the western corridor and there are others not visible because they have been buried by the sediment. On January 21, 2022, 676 pipes remain on the foreshore but in various states of exposure and sand cover;
- The acceptance of the emergency works by the Adissem community was confirmed during the discussions held during the social audit mission and also by a request from the villagers for an extension of the pipe wall works towards the east in order to protect the cemetery adjacent to the village.



Adissem: view of the Eastern corridor from its Eastern border



Adissem: view of the extension of the works to the East from the Eastern corridor



Adissem: view of the Western corridor from its Western border



Adissem: view of the Western corridor from its Eastern border



Adissem: view of the segments of pipes stranded in front of the central part with the presence of swimmers



Adissem: central part of the wall being repaired / reinforced

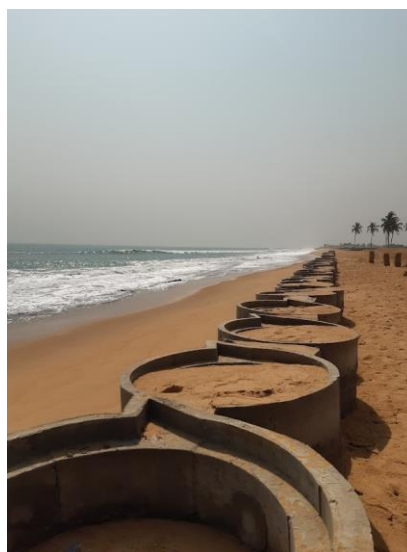
3.3.2 Tango

The installation of the emergency protection works near the village of Tango were completed at the end of September 2021. They were completed without any issues reported and have not incurred any significant wave related damage. There have been no complaints registered relating to the works from the fishing community of Tango. Support for the emergency works by the Tango community was confirmed during discussions held during the social audit mission.

During the field visit, the social audit experts observed that the pipe wall making up the protection works for the village of Tango were well aligned representing a fairly clear physical barrier due to the retention of sand still progressing on both sides of the pipe wall as intended by the original engineering design.



Tango: view of the protection works from the village



Tango: view of the protection works, with pipes being filled

3.4 **Impacts of emergency measures works on fishing communities**

3.4.1 Adissem

The discussions held with the Adissem fishermen focused on the risk of accidents due to the protection works. According to the fishermen that attended, there are potential risks related to fishermen swimming to the boats and bumping into the pipe segments that have been pushed to the foreshore or into the water by wave action/erosion and there are also potential risks to assets including boats and fishing equipment if they these collide with pipe segments during landing or storage.

During the discussions, the fishermen referred to a boat that was damaged following a collision with a pipe segment stranded on the foreshore. The accident was reported to the PIU and the contractor and a meeting between the PIU and the owners of the damaged boat was organized in

order to determine responsibility. The social audit mission was informed that a mediation report was drawn up following a discussion between the parties on 22/12/2021 in which the owner of the boat reasserts his claim for repair of the boat.

During the social audit mission, the communities mentioned one incidence where two swimmers hit segments of the concrete pipes that were submerged under the water. According to the PIU, the discussions between the concerned parties were inconclusive regarding the need to take action and as a result no mediation report was drafted.

The social audit mission indicated that the emergency works may create new risks for the fishing communities of Adissem and Tango but that these are temporary risks arising from the presence of segments of pipes stranded on the foreshore during the construction work phases and permanent risks arising from the fixed presence of new obstacles (the pipe wall) that boats and their crews might hit if the boats⁶ drift, as well as the risk that new pipe segments end up on the foreshore after completion of works. On this last point, it is worth mentioning that the solutions used for the emergency works are experimental solutions whose lifespan remains uncertain. One may not exclude that the pipe walls be damaged by the swell in the future after completion of the works, with risk from segments of pipes stranded on the foreshore. It is worth mentioning that the permanent risk resulting from the presence of new obstacles is a risk common to the construction of any structure in the coastal areas (jetties, rocky groynes). It is therefore not specific to this particular emergency works.

Regarding possible loss of income resulting from a reduction in the fishing activity of the community of Adissem due to the obstacles created by the works, no complaints have been recorded so far. Discussions were held with the representatives of the Adissem fishing community but the social audit mission concluded that it was unlikely that there was a negative cause and effect relationship between the works and the frequency of sea trips. The frequency of the trips depends on several factors, including: i) the fishing season (the visit of the mission in January took place during a low fishing season, the best season being between August and October); and ii) the height of the swell that can prevent fishermen from reaching their boats on certain days. The mission also did not identify any impacts on land and non-land assets in the two fishing villages.

The field visits nevertheless revealed: i) that the eastern access corridor of the concrete pipe wall at Adissem is clear of obstacles and of a width and a slight sloping profile well suited for hauling boats from the sea to the land (and vice versa) as evidenced by the presence of 6 or 7 boats parked on the land part of the corridor during the field visit; ii) the boat parking area observed during the mission is in active use as evidenced by the presence of boats anchored in the sea in front of the village and the seaworthiness of the boats stationed on land, with ready-to-use fishing gear in good

⁶ Without the wall, a drifting boat eventually encounters the beach with less chance of damage compared to damage from hitting a hard concrete structure in rough seas.

condition; and iii) the damage in the western access corridor causes users to use of the eastern access corridor, which is only a hundred meters away. Observers from outside the community confirmed to the social audit mission that fishing activities have continued as normal despite the works. As a result, the social audit mission's conclusion is that the emergency works at Adissem have had no direct impact on the access to the sea, and therefore on the livelihoods of the fishing community of Adissem.

3.4.2 Tango

The physical barrier created between the beach and the sea by the concrete pipes prevents direct access to the sea from the village. The Tango fishermen have adapted to this situation by shifting the parking location of their boats about 100 m west. During the discussions held during the social audit mission, the fishermen confirmed that changing the boats parking location on the beach does not have any particular negative impact on their fishing activities.

However, the Tango fishermen pointed out that the concrete pipes do constitute a potential danger for the boats and their occupants if they drift towards the installations during swells or errant waves. Their choice to shift the boat parking area by 100 m instead of a shorter distance from the village gives a margin of safety to reduce the risk of collision with the concrete pipes. It should be emphasized that this risk did not exist before the protection works. However, no such accident has been reported to the PIU or the contractor to date.

3.4.3 General impacts

The coastal communities in the project area recognized the positive effects of the emergency works on the resilience of the coastline during the discussions held during the social audit mission. The community of Adissem is requesting an extension of the works towards the east of the village in order to protect the cemetery.

It is also clear that the project had significant positive impacts on the living conditions of the concerned communities, including in particular the temporary income generated by the wages paid for local labor. The PIU used a high intensity labor approach (HIL or THIMO in French) for the construction of emergency installations,⁷ which allowed for direct and prioritized employment opportunities for the inhabitants of the concerned sites.

According to the data shared by the Contractor, various skills were required for the construction works: 11 works supervisors, 07 engineers assistant to the supervisors, 06 experts in charge of the

⁷ Construction solutions using specialized machinery were possible

implementation of the project, and 289 general labor workers (by gender: 161 men, or 56%, and 128 women, or 44%) for a total of 313 direct temporary jobs were mobilized during the execution of the project, between the period May 2021 and January 2022, with the vast majority of blue-collar jobs filled by recruitment among the coastal communities located next to the projects. According to the Contractor, the total amount of wages paid between May 2021 and January 2022 to workers on the construction sites of emergency works reached a total of more than 155 million XOF (\approx USD 265,000). Remuneration included monthly salaries of more than one hundred thousand XOF francs paid to residents employed full-time, nearly three times the minimum wage applicable in Togo. The works also brought indirect economic benefits through the purchase of goods and services used by the Contractor for the construction (e.g., manufacturing of pipe segments, transportation of equipment). During the interviews conducted during the mission, the community of Adissem recognized the positive impact of the emergency works on household income through the remuneration paid by the Contractor to the employed inhabitants.

3.5 The safeguard measures identified prior to the start of the emergency works with regard to fishing

An environmental and social screening was undertaken for the emergency coastal protection sub-project and was finalized in March 2020 by the PIU. It identified some limited impact in terms of temporary disruption of fishing activities due to excavation works that were necessary in order to find the bedrock on which the Contractor would install the concrete pipes. The assessment included recommendations for mitigation measures that were incorporated into the requirements applicable to the Contractor.⁸ These included: (i) identification of new boat storage areas for fishermen; (ii) regular assessment of the livelihoods of impacted fishermen; and (iii) ongoing discussions with fishermen.

Concerning the points above, the social audit mission found:

- i. Instead of finding an alternative beaching location for the boats, the Contractor relocated the concrete pipe segments that were being stored prior to installation.
- ii. The PIU confirmed that they did not undertake any regular evaluation of the means of subsistence of the affected fishermen. They did not provide a reason. The social audit mission recommends that the PIU take charge of this evaluation with a comprehensive monitoring plan that includes consultations and relevant indicators.
- iii. Permanent discussions have been maintained between the fishing communities and the representatives of the Contractor, the control office and the PIU. It was these ongoing discussions that led to the decision to modify the initial plans to integrate the creation of the two 50 m corridors in order to allow easier passage for boats and community members.

⁸ Source: Safeguard document of the emergency coastal protection sub-project with the technique of juxtaposition of wells in granulitic barrels – Report of the environmental and social screening mission. PIU, March 2020.

Ongoing discussions also made it possible to quickly identify and take into account the needs of fishermen in terms of freeing up space on land and removing segments of pipes segments left on the foreshore. It should be noted that the permanent monitoring of the sites has been strengthened by weekly supervision missions from the World Bank in Lomé since September 2021.

In summary, the safeguard measures identified prior to the start of the emergency works with regard to the fishing sector are considered adequate and were in general applied to mitigate the impacts resulting from a temporary disruption of fishing activities. However, regular monitoring of the livelihoods of the affected fishermen during the works has not been implemented. This has been partially augmented by the weekly supervision missions by the World Bank team in Togo. However, as already underlined, this activity should be carried out by the PIU.

However, the safeguard measures did not include any measures to address the safety of the sites during the works specifically related to: i) the segments of pipes stranded on the foreshore that were partially buried but also partially uncovered; and ii) the risk of collision between the boats and the concrete pipe walls. According to the fishing community of Adissem, there was one accident related to a boat (see section 3.1) but no incidences of collision of boats with the concrete pipe wall have been reported. The stranded pipe segments were removed by the Contractor's excavators, but there was still work to be done as 676 pipes were observed on the foreshore at the time of the visit of the social audit mission.



Adissem: excavator in action on 01/28/2022 to remove pipe segments stranded on the foreshore (Contractor photos)

4 Grievance Redress Mechanism (GRM)

The social audit mission noted that the Project Management Unit (PIU) had set up the GRM at the village, canton and town hall levels and that the registration sheets and the complaint registration books are available at the places indicated (in Annex 3 the list of registered complaints).

The population of Adissem indicated that they are aware of the GRM. The social audit mission noted that the populations tend to make more informal complaints instead of formal filings. For example, the incidence concerning the two swimmers mentioned during the discussions with the communities were informally reported. This requires some corrective action by the grievance committee members so that there is a process to register all complaints whether they are verbal, via telephone, or WhatsApp.

In Tango, the community is not aware of the GRM. However, no complaint was submitted to the social audit mission or has been raised during the consultation. The social audit mission was informed that a woman representing the community of Tango benefited from the training on the GRM in Agbodrafo but this was not followed up with any sort of a dissemination action. This requires monitoring and documentation of the awareness-raising plans to be put in place by the local grievance committees coordinated by the PIU.

In summary, the GRM is known and accessible to the communities of Adissem as well as the target villages (Nimagna, Dévikémè 1 and Dévikémè 2 and Gbodjomé). However, the village of Tango did not benefit from specific awareness raising regarding the existence and places for registration of complaints. Nevertheless, the social audit mission notes that the communities seem to confuse complaints related to the emergency protection works with complaints relating to all coastal protection works. This leads communities to submit broader non-specific complaints, as evidenced by the nature of the complaints attached to this report (Annex 3). At the Town Hall of Lacs 3 (Agbodrafo), it is noted that fishermen make informal complaints to the grievance committee concerning incidences of pipes stranded on the foreshore. These informal complaints are not reported to the PIU. The social audit mission notes that only one GRM is implemented by WACA ResIP. The social audit mission recommends that the World Bank encourages the PIU to implement a local information and awareness system to enable communities to be informed about the distinction between complaints relating to the works of the emergency protection sub-project and long-term protection works along the whole coastal area. In addition, enhanced training on the mechanism is essential in order to improve the transparency and equitable access of the communities to the GM.

5 Health-safety-environment on the sites

The initial ESIA process recommended: i) the installation of mobile latrines; ii) sensitivity regarding the risk of gender-based violence; iii) the installation of a medicine box for the care of workers; iv) the need to have an insurance policy covering people working on the emergency protection works.

During the social audit mission, however, it was noted that there are no mobile latrines installed or available in the vicinity of the emergency protection works. According to the information collected from the control mission, the Contractor decided to negotiate with the owners of the surrounding homes to allow the workers to have access to the toilets. This is completely inappropriate. The social audit mission was unable to obtain any sort of contract or written agreement between the owners of the surrounding houses and the Contractor for access to the toilets. At a minimum, the social audit mission recommended that toilets be separated by gender with clear identification and adequate lighting etc.

In terms of health and safety at work, the workers interviewed by the social audit mission indicated that there were cases of minor injuries on the construction site that were satisfactorily managed by the Contractor, but the social audit mission notes that these cases of injury were not documented. In addition, there is a medicine box in Adissem where work is continuing, which is made available to workers. However, the social audit mission found that this box is almost empty. Finally, the social audit mission noted that the Contractor has taken out an insurance policy with FEDELIA INSURANCE.

With regard to the system for securing works sites, the social audit mission noted a lack of safety markings in the area where the works are taking place in the western part of Adissem. This can expose children, vulnerable people and immediate residents to the risk of accidents especially related to the steep slope of the beach and height of the construction. This point deserves a corrective measure to be taken by the PIU.

In addition, on the Adissem site, few people wear Personal Protective Equipment (PPE). In terms of Covid-19 barrier measures, there is little use of anti-Covid-19 masks as it is difficult to work with the masks. Distancing measures are not respected due to the chain work that is required during construction. Regarding the Covid-19 vaccine, some workers declare having received an anti-Covid vaccine, others indicated that they have not been vaccinated. The social audit mission did not have access to any vaccination card to confirm the declarations.

6 Analysis of the institutional framework

Within the scope of the emergency protection subproject works between Gbodjomé and Agbodrafo, the institutions identified by the PIU that are involved in the implementation process are the following:

- The Recipient Ministry of the Environment and Forest Resources (MERF). The ministry in charge of the environment and the ministry supervising the coordination of the WACA ResIP project.
- PIU: WACA ResIP coordinates and manages the implementation of the emergency protection works and ensures compliance with safeguard measures. Also responsible for communication and engagement regarding the project with the communities and local authorities.
- Construction and supervision: AGE CET BTP is the technical control firm for the execution of the works, which are carried out by CORNET/TerROC.
- Contractor: the CORNET/TerROC consortium is the operational structure for the emergency protection works of the six project sites. It reports progress achieved to the PIU.
- Beneficiaries: Lacs 3 Town Hall, Lacs Prefecture and their communities. The mission carried out interviews with the PIU and the town hall. At the end of the interviews, the PIU confirmed that at the end of the official handover, the management of the works will be ensured by the Mayor's Office. This is confirmed by the Mayor's Office, but the later underlined that there is currently no document signed between the stakeholders on this subject.

Furthermore, during the interviews, the social audit mission met the Prefecture of Lacs (Aného) which is a direct beneficiary of the sub-project through the Town Hall. The prefectural authorities expressed their acceptance of the sub-project and underlined their participation in the identification and formulation of the project. However, they regretted that they were not involved during implementation and no longer have knowledge of the different stages of the project. Nevertheless, the authorities of the Prefecture of Lacs believe that Togo's experience deserves to be refined, supported and disseminated to all coastal countries under the label of Togolese expertise.

7 Conclusions and recommendations

The social audit focused on the emergency protection subproject works financed under Component 3 of the project: Strengthening national, physical and social investments, which includes the financing of investments or coastal sub-projects to protect vulnerable areas from coastal erosion and flooding, support pollution control, waste management and promote climate-resilient coastal development. The emergency protection subprojects aim to provide short term protection against coastal erosion for private and community buildings.

During their site visit, the social audit mission observed that the local populations feel threatened by the advance of the sea that has and will destroy homes and buildings. The primary beneficiaries confirmed that the protection offered by the emergency works area positive effect of the project. The project has also had significant positive impacts on the livelihoods of villagers as a result of the wages paid to the workers largely recruited among the local coastal communities living next to the subprojects. The worksites also have an indirect impact on the local economy with a demand for goods and services.

The social audit mission concluded that the project did not generate any negative impacts for the local communities. The fishing communities in Adissem and Tango do not seem to have suffered physical and economic displacement. However, the mission noted one accident and one minor incidence related to the works in Adissem. The accident is the damaged boat mentioned before (not yet recorded in the GRM), and for which a “note verbale” (minutes) were recorded and for which the boat repair would be paid by the project. The incidence concerns a minor scrape on two persons incurred while swimming, which was not recorded in the GRM, nor was a “note verbale” prepared. The social audit nevertheless recognizes that the emergency protection works poses risks in the short and medium term, which can be mitigated by appropriate measures. On the cultural level, no relics or cultural practices have been affected by the emergency protection measures.

The findings and conclusions of the social audit mission result in the following recommendations:

- **Commit to the repairing the boat in Adissem** that was damaged in a collision with the works. This should follow due process and use appropriate standards.
- **Remove approximately 676 pipes stranded on the foreshore in front of the village of Adissem** as soon as possible in order to reduce the risk to property or persons.
- **The concrete pipe walls should have adequate signage that is visible both day and night from the sea and the coastline on all sites** in order to reduce the risk of collision with boats. As a suggestion, poles exceeding the height of the pipes by 3 or 4 m may be fixed at the ends of the pipe walls, one in the middle pipe, or the most forward in the sea. Illuminated signage (fixed or flashing LED bulbs powered by solar battery) could be attached to the top of each beacon.
- **Measures should be taken by the public entities responsible for the works (municipalities?)** to ensure there is local **acceptance of the works and adequate solutions for cleaning up all the sites in the event of damage**. The concrete pipe walls built under the WACA ResIP project are indeed short term, highly experimental solutions

and the stranding of additional pipe segments on the foreshore over the next few months or years remains a possible risk.

- **With regard to the Grievance Mechanism**, the social audit mission recommends that the World Bank team encourages the PIU to implement an increased training on the GRM and its mode of access and operation, a local information and awareness-raising system to allow communities to have equitable and transparent access to the places of registration of complaints related to the emergency works project in the coastal zone.
- **The social audit mission recommends that gender-sensitive mobile toilets/latrines be put in place upon the completion of the works and for future periodic maintenance** of the emergency protection works.
- **The social audit mission recommends that workers systematically wear appropriate personal protective equipment** and the implementation of a weekly verification system. In this case, the checklist of the safety and health measures taken must be drawn up before the start of the protection works.
- **The social audit mission recommends that the Préfecture des Lacs, which is the institution responsible for monitoring the conformity of the acts of the Town Hall, be involved in all of the stages of execution of projects** or future protection works in the coastal zone.
- **The social audit mission recommends that the contractor provide an equipped medicine box to provide first aid in the event of a work related injury as well as Covid-19 masks for use by workers.** Under these conditions, it is essential that the Bank and the Project Implementation Unit (PIU) monitor and supervise the implementation of this occupational health and safety measure.

*

Note in passing (outside the scope of this mission)

The visit of the existing groynes at Aného revealed that there is no protection / signaling of the works (see below). Pedestrians have free access to the groynes with the risk of falling between the blocks of rock, and the groynes are not marked, which would have made them more visible from the sea, day and night, and would have reduced the risk of collisions with boats.



*Aného (East Agbodrafo): view of one of the existing protection groynes
(construction prior to the WACA intervention)*

Annex 1 : Line of emergency protection works completed

Sites	Planned line (m)	Line of works completed					Total	Observations
		Frontal	Side wall					
			West	Intermediate	East			
EMERGENCY PROTECTION								
Tango Copé, fishermen's house	200	160	15		15	190	-	
Dévikinné 2 (Construction of family home protection works)	100	68+42=110	15		15	140	-	
Nimagna, Hôtel James Beach Hiding Rooms Nimagna, Hotel James Beach Hiding Rooms	200	150	15		15	180	-	
Adissem, fishing village	500	360	30	30	30	450	L'ouvrage est segmenté en 3 parties. Les longueurs frontales sont : <ul style="list-style-type: none"> • Kopevi: 86 ml • Centre: 162 ml • Kopegan: 112 ml The works are divided into 3 parts. The frontal lengths are: <ul style="list-style-type: none"> • Kopevi: 86 ml • Center: 162ml • Kopegan: 112 ml 	
Total 1: Line to be urgently protected	1,000	780	180			960		
PROTECTION FOR ACTION RESEARCH								
Gbodjomé (Strengthening of protection works under research-action)	80	80	24		16	120	The side walls were used to join the model wall to the East and the promontory to the West	
Dévikinné 1 (Strengthening of protection works as research-action)	100	162	25		15	202	The works have been extended to link them to those of Dévikinné 2.	

Sites	Planned line (m)	Line of works completed				Total	Observations
		Frontal	Side wall				
			West	Intermediate	East		
Total 2: Line protected as action research	180	242	80			322	
Total line to be protected	1,180	1,020				1,280	

Source: PIU

Annex 2 : Schedule of the social audit mission

Activities	Date	Locality/place
Arrival of the international expert in Lomé	23/01/2022	Lomé
Briefing with the Bank	24/01/2022	Videoconference /Lomé
Review of the ToR with the TTL of the Bank in Lomé	24/01/2022	Headquarters World Bank, Lomé
Visit of local authorities: Interview with the canton chief Gbodjomé Interview with the village chief Alogavi Interview with the head of the Adissem site Interview with representatives of the Town Hall of Lacs 3	25/01/2022	Coastal area
Visits to the six sites: Visit of the Adissem site as well as the facilities linked to the emergency project Visit of the Dévikinmé 1 & 2 site Visit of the Nimagna site Visit of the Tango site and facilities Discussions with fishermen on the sites	25/01/2022	Project sites
Consultation with the beneficiary populations (on the sites) / fishermen and fishmongers: - Public consultation with the communities of Adissem (fishermen and fishmongers) - Consultation with Tango communities	26/01/2022	Adissem, Tango
Consultation with the Contractor Consultation with the control mission Consultation with PIU Visit of the remediation works following the damage in Adissem	27/01/2022	Lomé, on the sites (Adissem and Tango)
Debriefing : Synthesis with the TTL in Lomé Debriefing with the World Bank team	28/01/2022	Videoconference, Lomé
Session for the determination of additional field activities the week of 01/31/2022 between consultants and the TTL	28/01/2022	Lomé
Departure of the international expert	29/01/2022	Lomé
Consultation with institutions involved in the implementation of emergency protection works: - Consultation with the town hall - Consultation with the Lacs prefecture - Consultation with the PIU (additional information) - Consultation with the ANGEL - Consultation with the Contractor - Consultation with the control mission (additions)	31/01 to 01 /02	Agbodrafo and Lomé

Annex 3 : Summary of complaints recorded and processed within the scope of implementation of the emergency protection works (Source : UGP)

Date of the complaint	Complainant's name	Complainant's sex		(Nature) Complaint channel		Complaint Summary	Measures taken to settle the complaint	Responsible person (presumed guilty)	Current state
		F	M	Verbal	Written				
15/03/2021	[REDACTED]		X	X		Following the extraction of gravel on the sites of the emergency protection sub-project, the head of the Agbodrafo post denounces the continuity of the said activity because the piles of gravel seized were picked up by the workers. The latter seem not to recognize the facts, which led to altercations between them.	The PIU went straight away to raise awareness among the workers on the effectiveness of the ban on the removal of sea gravel on the coast and therefore to obey the order of the head of Agbodrafo post until further notice. Subsequently, the measures taken by the PIU resulted in obtaining a special authorization for the extraction of gravel; which allowed the continuation of activities.	Cornet Ter Roc Group	Settled
06/04/2021	[REDACTED]		X		X	[REDACTED] spokesperson for the inhabitants of Gomou kopé and Avépozo,	A list of PAPs is available and compensation and support measures are	Presidential decree	Ongoing

Date of the complaint	Complainant's name	Complainant's sex		(Nature) Complaint channel		Complaint Summary	Measures taken to settle the complaint	Responsible person (presumed guilty)	Current state
		F	M	Verbal	Written				
						calls for support for the populations living on the coast in the face of the government's decision to relocate them. This complaint is sent by the complainant by email to the Bank, then transferred to the PIU.	recommended in the RAP for long-term coastal protection works between Agbodrafo and Sanvee Condji.		
17/06/2021	██████████ ██████████		X		X	Our fellow fishermen believe that WACA would prevent fishing activities on the coast. We would like a frank dialogue with you to clarify the impacts that WACA's activities would have on fishing.	The series of consultations within the scope of preparation of the ESIA and RAP took these concerns into account.	WACA ResIP TOGO	Settled
20/08/2021	██████████ ██████████ ██████████ ██████████		X	X		The fishermen's delegation is concerned about the obstruction of the beach of Adissem	Arrangements are made to declutter two 50m corridors to allow fishermen to carry out	PIU	Settled

Date of the complaint	Complainant's name	Complainant's sex		(Nature) Complaint channel		Complaint Summary	Measures taken to settle the complaint	Responsible person (presumed guilty)	Current state
		F	M	Verbal	Written				
						by the barrels manufactured not yet used preventing the landing of the boats, the barrels carried by the sea reducing the navigability and the impact which the work of the protection could have on fishing with a beach seine.	their activities unhindered		

Annex 4 : List of persons consulted during the Social Audit mission

4.1. Consultation at the community level

N°	Last name and first name	Function	Contact
1	[REDACTED]	[REDACTED]	
2	[REDACTED] [REDACTED]	[REDACTED]	
3	[REDACTED] [REDACTED]	[REDACTED]	
4	[REDACTED]	[REDACTED]	
5	[REDACTED]	[REDACTED]	
6	[REDACTED]	[REDACTED]	
7	[REDACTED]	[REDACTED]	
8	[REDACTED]	[REDACTED]	
9	[REDACTED]	[REDACTED]	

4.2. Consultation with the contractor/control mission and PIU

N°	Last name and first name	Function	Contact
1	[REDACTED] [REDACTED]	[REDACTED]	
2	[REDACTED]	[REDACTED]	
3	[REDACTED]	[REDACTED]	
4	[REDACTED]	[REDACTED]	
5	[REDACTED]	[REDACTED]	
6	[REDACTED]	[REDACTED]	
7	[REDACTED] [REDACTED]	[REDACTED]	
8	[REDACTED]	[REDACTED]	

4.3. Consultation avec la préfecture des Lacs

Consultation with the Lacs prefecture

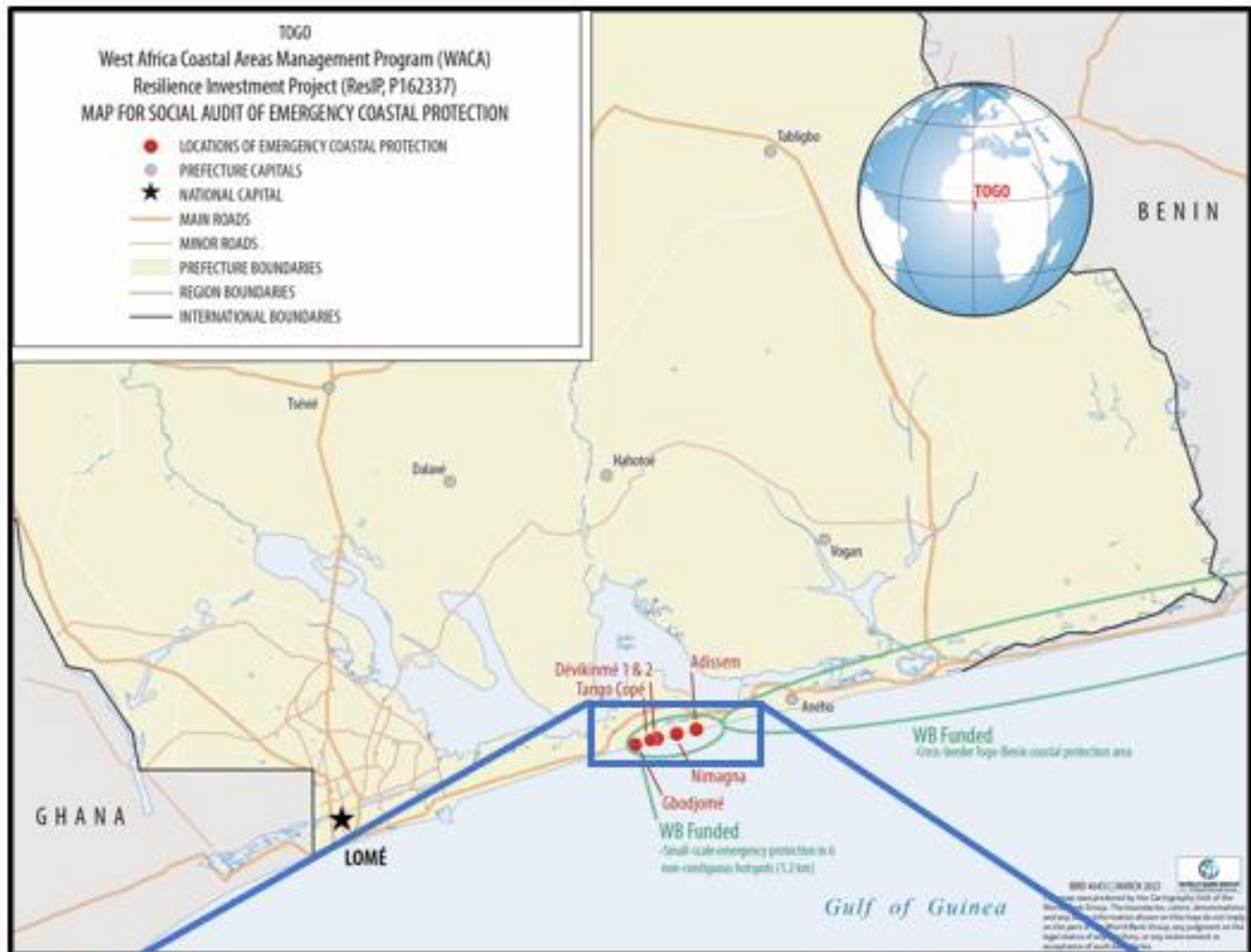
N°	Last name and first names	Function	Contact
1	[REDACTED]	[REDACTED]	
2	[REDACTED]	[REDACTED]	

4.4. Consultation avec les communautés de Adissem et de Tango (liste manuscrite)
Consultation with the communities of Adissem and Tango (handwritten list)

N°	Full name	Function /Title	Sex
1		Fish wholesaler women	F
2		Fish wholesaler women	F
3		Fish wholesaler women	F
4		Fish wholesaler women	F
5		Fish wholesaler women	F
6		Fish wholesaler women	F
7		Fish wholesaler women	F
8		Fish wholesaler women	F
9		Fish wholesaler women	F
10		Fish wholesaler women	F
11		Fish wholesaler women	F
12		Fish wholesaler women	F
13		Fish wholesaler women	F
14		Fish wholesaler women	F
15		Fish wholesaler women	F
16		Fish wholesaler women	F
17		Fish wholesaler women	F
18		Fish wholesaler women	F
19		Fish wholesaler women	F
20		Fish wholesaler women	F
21		Fish wholesaler women	F
22		Fish wholesaler women	F
23		Fish wholesaler women	F
24		Fish wholesaler women	F
25		Fish wholesaler women	F
26		Fish wholesaler women	F
27		Fisherman	M
28		Fisherman	M
29		Bricklayer	M
30		Fisherman	M
31		Fisherman	M
32		Fisherman	M
33		Fisherman	M
34		Fisherman	M
35		Elder	M
36		Fisherman	M
37		Fisherman	M
38		Fisherman	M
39		Fisherman	M
40		Fisherman	M
41		Fisherman	M
42		Fisherman	M
43		Fisherman	M
44		Fisherman	M
45		Fisherman	M
46		Fisherman	M
47		Fisherman	M
48			M
49		Fisherman	M

50		Fisherman	M
51			M
52		Fisherman	M
53		Fisherman	M
54		Fisherman	M
55		Fisherman	M
56		Fisherman	M
57		Fisherman	M
58		Bricklayer	M
59		Fisherman	M
60		Fisherman	M
61		Fisherman	M
62		Fisherman	M
63		Fisherman	M
64		Fisherman	M
65		Fish wholesaler women	F
66		Fish wholesaler women	
67		Fisherman	
68		Fish wholesaler women	F
69		Fish wholesaler women	F
70		Fish wholesaler women	F
71		Fish wholesaler women	F
72		Fish wholesaler women	F
73		Fish wholesaler women	F
74		Fish wholesaler women	F
75		Fish wholesaler women	F
76		Fisherman	M
77		Fish wholesaler women	F
78		Fish wholesaler women	F
79		Fisherman	M
80		Fisherman	M
81		Fisherman	M
82		Fisherman	M
83		Fisherman	M
84			M
85		Fisherman	M
86		Fisherman	M
87		Fisherman	M
88		Fisherman	M
89		Fisherman	M
90		Fish wholesaler women	F
91		Fisherman	M
92		Fisherman	M
93		Fisherman	M
94		Fisherman	M
95		Housewife	F
96		Housewife	F
97		Housewife	F
98		Housewife	F

Annex 5: Map of Emergency Protection Sites

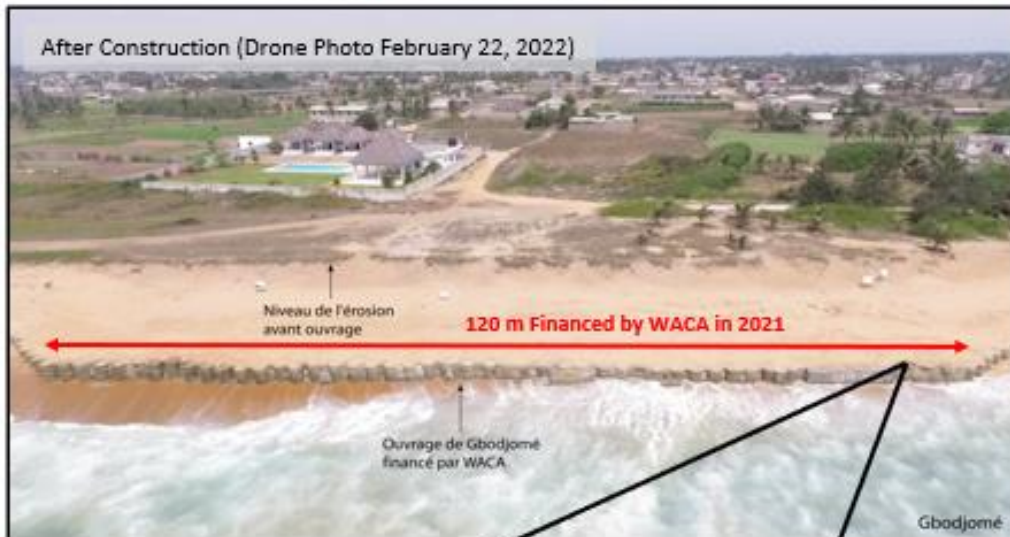


Annex 6: Site of Gbodjomé

Gbodjomé

Geo location: 6.1859545° N 1.4123653° E

Purpose of construction: Protection of houses, and research and development



Gbodjomé

Geo location: 6.1859545° N 1.4123653° E



Annex 7: Site of Tango Copé

Tango Copé

Geo location: 6°11'20.52"N 1°25'21.43"E

Purpose of construction: Protection of fishing village (190 meter)



Tango Copé

Geo location: 6°11'20.52"N 1°25'21.43"E

Looking West



After Construction (Drone Photo February 22, 2022)

Remaining part of fishing village

Looking North



After Construction (Drone Photo February 22, 2022)

Annex 8: Sites 1 & 2 in Dévikinmé

Dévikinmé 1 & 2

Geo location: 6°11'23.40"N 1°25'37.52"E

Purpose of construction: Protection of the remaining part of a fishing village, which had lost 2-300 meter of beach front to coastal erosion (only the former well is visible now).



Dévikimé 1 & 2

Geo location: 6°11'23.40"N 1°25'37.52"E



Annex 9: Nimagna Site

Nimagna

Geo location: 6°11'35.08"N 1°26'24.02"E

Purpose of construction: Protection of local economic interest (a hotel), 180 m,



Annex 10: Adissem

Adissem

Geo location: 6°11'45.88"N 1°27'10.54"E

Purpose of construction: Protection of 500 m, and research and development Special



Adissem

Geo location: 6°11'45.88"N 1°27'10.54"E

Purpose of construction: Protection of 500 m, and research and development Special



Adissem

Geo location: 6°11'45.88"N 1°27'10.54"E

Purpose of construction: Protection of 500 m, and research and development Special



Annex C

NOTE ON FISHERIES AND COASTAL PROTECTION

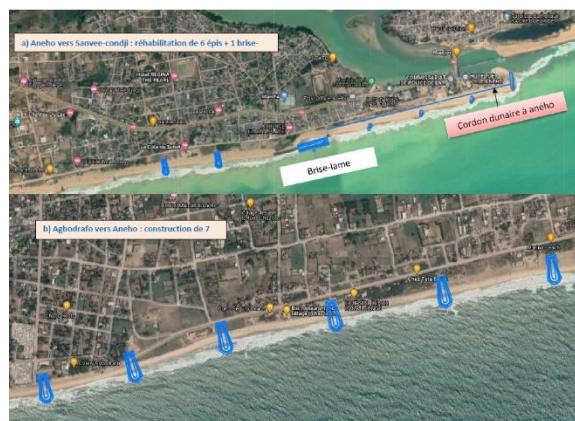
Togo West Africa Coastal Areas Management Program (P162337)
Note on Fisheries and Coastal Protection
May 23, 2022

This note responds to the question of what disturbance of fisheries is anticipated, how impact will be identified and monitored, and what will be done about it if there are impacts on livelihoods.

About WACA. The West Africa Coastal Areas Management (WACA) Program supports governments in managing coastal erosion of countries' coastlines to protect the homes and livelihoods of communities in critical sites, prevent loss of national infrastructure, and enable sustainable economic development. The Program complements other government efforts to sustainably develop coastal zones.

Context. Fishing has traditionally taken place along the whole of Togo's 56 km of coastline, in the territorial waters and the Exclusive Economic Zone. Artisanal fishing is more prevalent than industrial fishing and involves many small-scale fishers. Fishers use very simple gear and techniques. The catch is pelagic and demersal. In 2014, several studies estimated annual national fish production at 22,000 tons. These statistics indicate that production does not meet national needs, which were estimated at 65,000 tons, the remainder being imported. This situation is reflective of the state of fisheries worldwide.¹ According to the FAO (2020) the fish catch shows a downward trend due to environmental degradation (such as coastal erosion), and "fully exploited" or "over exploited" of the fishery resources.² Technical-structural reasons contributing to losses include the use of purse seine (*Senne tournante*, in French) and beach seine (*Senne de plage*, in French) fishing methods, which is known to negatively affect fishery resources and their habitat due to their non-selectivity and capture of juvenile fish, among other reasons.^{3,4} Coastal erosion has meant that Dévikinmé and Nimagna are no longer considered fishing communities by the FAO.

The groynes. The construction of groynes, together with beach nourishment, was identified as the best solution to protect the coast. There is no relevant documentation available on how groynes on West African shores might affect fishery resources. Even as their construction seeks to protect social infrastructure and thus jobs and livelihoods, the physical footprint of the groynes may change where fishing can be practiced. The significance of the impacts is difficult to assess ex-ante. Hence, there is a need to monitor, identify, and address issues during implementation, which the project has foreseen. It is likely that the approximate distance of 0.5km between the groynes



would allow fishers to continue using the beach seine method, depending on the gear dimensions, even though the practice by experts is considered detrimental in the long run for sustainable fisheries. It should be noted in this regard that the WACA Program is not a fisheries management initiative and is not involved in national or regional management of fishing capacity, effort, or governance, for which the Fisheries Committee for the West Central Gulf of Guinea (FCWC) is engaging national and international players.

¹ <https://www.fao.org/state-of-fisheries-aquaculture>

² Per FAO categories of exploitation

³ https://www.researchgate.net/publication/260399118_PECHE_A_LA_SENNE_DE_PLAGE_AU_BENIN_ET_DURABILITE_DES_RESSOURCES_HALIEUTIQUES

⁴ <https://www.fao.org/documents/card/en/c/ca8716fr/>

Anticipated disturbances. Per the project's Environmental and Social Impact Assessment (ESIA), because fishing is one of the principal activities of the communities, and fishers are among the people potentially most affected by the project, more than 150 people were consulted in Agbodrafo and Aného in August 2021, in addition to consultations with fishermen associations. A matrix was used as an analytical approach to assess relative importance of risk (ESIA, page 74 ff). Disturbance of economic activities was identified as an important impact (ESIA, page 321 ff). To mitigate the identified economic impacts, the ESIA proposed to consider a landing site for fishermen at Kpémé, support to acquire materials and equipment (motors, nets, canoes, hooks), construction of public toilets to help prevent open defecation, construction of sheds at several sites (Kpémé, Agbodrafo, Adissem, Goumou-Kopé, Gbodjomè and Tango) to sell fish, construction of a cold room at Kpémé to keep the catch fresh. It was also recommended to limit dredging in high intensity fishing areas. Other impacts identified included those occurring during the groyne construction phase, including disturbance of marina fauna, work site and storage area issues of health and safety for workers and the local population, and interruptions of fishing activity in the construction zone.

Managing impacts. Because of the uncertainty in determining the precise location of impacts, stakeholder engagement and monitoring constitute key elements of environmental and social management. A grievance redress mechanism (GRM) has been put in place so that project-affected people can submit feedback and concerns about the project, via established grievance committees. Communities are also reached through an ongoing information campaign, including a Coastal Radio (*Radio du littoral*, in French) station that provides information about the project, its footprint, construction phases, schedules for completion and anticipated benefits. These efforts, together with engagement of civil society, are designed to support a dynamic and productive development process. With regard to potential livelihood impacts, the project implementing unit has already received a number of suggestions to address them, and consultations will be held with communities to identify and decide on proposed solutions. The upcoming mid-term review (June 2022) will assess the progress made on social sub-projects. Regarding environmental impacts, the contractor will monitor water quality, among other parameters. The contractor also will maintain a log to record any incidents that could have a significant impact on the environment or livelihoods of the population.

Positive impacts. The ESIA anticipated that the widening of the beaches on the protected segments of the coastline could reduce vulnerability to marine submersion and better protect the upper sections of the beach where people live and conduct business. The protection offered by the groynes and beach nourishment will help to support the local economy (fishing and tourism) in the coastal zone. Improvements in the tourism appeal of the beaches through socio-economic development is planned under the project. The temporary works for coastal protection will also contribute positively to community livelihoods, as highlighted in the social audit for the emergency infrastructure works. On the other hand, if no groynes were constructed, fishing using beach seine nets would likely become impossible in the medium term as a result of coastal erosion causing the exposure of beach rock, as has been the case in the areas where the emergency works were needed. A reduction in beach seining would likely have benefits for the recovery of the fish stock on which the communities depend for their nutrition and livelihood.