

# **THE INSPECTION PANEL**

## **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)**

NOVEMBER 8, 2021





**The Inspection Panel  
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**

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) (unless explicitly stated otherwise, these three projects are jointly referred to as WACA or the “Project”) in Togo. The Request was submitted by two community members living in the villages of Kpogan<sup>1</sup> and Kpémé on the coast of Togo who represent the community. 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,<sup>2</sup> and 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 reprisal.

2. The Requesters allege that the Project, which intends to implement resilience measures in the coastal area, will adversely affect the fisherfolk, residents, and property owners along the Togolese coast. The Requesters raise five areas of concern. First, they claim that they are under threat of eviction because of the Project. Second, they are concerned that because of the Project activities a smaller area of the beach remains for the fishing communities to use for their activities, which has an impact on their livelihood and on the livelihood of the community overall. Third, they are also concerned about the planned involuntary resettlement and the valuation, compensation and relocation sites related to this process. Fourth, they claim that PAPs have not received adequate and timely Project information and have not been meaningfully consulted about Project activities. Fifth, they claim that alternatives to the physical aspects of the Project were not fully analyzed; this includes the option of sand-dredging.

3. The Panel registered the Request on September 7, 2021, and Management submitted its Response (the “Management Response”) to the Request on October 7, 2021. In accordance with the Panel Resolution,<sup>3</sup> the purpose of this report is to make a recommendation to the Board of Executive Directors (the “Board”) as to whether an investigation into the matters alleged in the Request is warranted. Based on its assessment below, the Panel recommends deferring its

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<sup>1</sup> 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.

<sup>2</sup> The nine villages are Adjissenou, Agbavi, Agbodrafo, Alimagna, Djéké, Follygah, Gbodjomé, Kpémé, and Kpogan.

<sup>3</sup> The World Bank Inspection Panel, Resolution No. IDA 2020-0003, September 8, 2020 (the “Resolution”). Available at: <https://www.inspectionpanel.org/sites/www.inspectionpanel.org/files/documents/InspectionPanelResolution.pdf>.

recommendation as to whether an investigation is warranted to allow sufficient time for the Management actions highlighted in the Management Response to address the allegations of harm raised in this Request. The Panel will reassess the situation considering the implementation of the Management actions and will inform the Board of its recommendation within six months.

## **B. Description of the Project**

4. 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 in an IDA Grant. It is a regional project benefitting Benin, Côte d'Ivoire, Mauritania, São Tomé and Príncipe, Senegal and Togo. Togo is a 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 a recipient of US\$7.53 million.

5. On June 18, 2021, the Board approved an additional Credit of US\$18 million equivalent and an additional Grant of US\$18 million equivalent to reflect the coverage of cost overruns. The additional financing is to support Component 3 (see explanation below) in Benin and Togo. Togo is the recipient of US\$6 million equivalent of the additional IDA Credit, and US\$6 million equivalent of the additional IDA Grant.

6. WACA is an environmental Category A project. The following safeguard policies are triggered: Environmental Assessment (OP/BP 4.01), Natural Habitats (OP/BP 4.04), Physical Cultural Resources (OP/BP 4.11), and Involuntary Resettlement (OP/BP 4.12). The Project was 13.1 percent disbursed at the time of receipt of the Request. The expected closing date of the Project is December 31, 2023.

7. WACA's Project Development Objective is "*to strengthen the resilience of targeted communities and areas in coastal Western Africa.*"<sup>4</sup> The Borrower on the side of Togo is the Ministry of Economy and Finance, and the implementing agency is the Ministry of Environment and Forest Resources (Directorate of Environment). The Project is being implemented by the West Africa Coastal Areas Management Program, as the Project Implementation Unit (PIU).

8. According to the Project Appraisal Document (PAD), the Project includes four components:<sup>5</sup> Component 1 - Strengthening Regional Integration, which aims to support regional policy and protocols for coastal zone management, build capacity for coastal zone observation and early warning systems, and develop and coordinate access to finance instruments; Component 2 - Strengthening the Policy and Institutional Framework, which intends to help countries develop the adequate policy framework and the necessary tools for the development and/or operationalization of their coastal management strategies and plans, both at the national and regional levels; Component 3 - Strengthening National Physical and Social Investments, which plans to finance coastal investments, or subprojects, to protect vulnerable areas from coastal erosion and flooding, to support pollution control and waste management operations, and to promote climate-resilient coastal development; and Component 4 - National Coordination, which aims to ensure that the

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<sup>4</sup> Project Appraisal Document (PAD), p. 29, para. 36.

<sup>5</sup> Project Appraisal Document (PAD), pp. 33-37.

Project is implemented in accordance with the PAD and the country-specific project description, and that the Project's multisectoral investment plan or an agreed alternative national strategy or plan continues to form the basis for coordinated support from technical and financial partners addressing the most pressing needs for management of the coast.

9. In Togo, the coastal protection works under the Project will cover villages from Agbodrafo to Aného, where there are sites for construction of new groynes and rehabilitation of existing groynes. The small-scale emergency coastal protection works will take place in six sites outside of the above-referenced area – in Gbodjomé, Tango, Nimanga, Adissem and two sites in Dévikinmé.

### **C. Summary of the Request for Inspection**

10. This section summarizes the issues raised in the Request and subsequent communications the Panel had with the Requesters on August 2, 16 and 27, 2021, to better understand their concerns and to seek clarifications. The Request is attached to this report as Annex 1.

11. The Requesters state that the Project, when implemented, will have future negative repercussions on fishing activities and existing land disputes in the coastal areas. They state that in 2009 the residents had access to about 400 meters of shore but at the time of writing the Request, due to the advancing sea that affected houses and fields of coconut palms, they had access to only 20 meters. They stated that the wells of Gbodjomé, which are now standing at the edge of the sea, are an example of the impact of shoreline erosion. They add that the Government asked residents to clear the shore.

12. They state that the latest deadline the Government has given residents to vacate their premises to give way to the WACA has complicated the situation. They state that the community is upset and believes that this order from Government will prevent artisanal fishing.

13. In exchanges with the Panel, the Requesters re-stated their belief that some of the resilience measures the Project plans to implement against the decades-long coastal erosion process would adversely affect them. The Requesters allege that artisanal fishing and the livelihoods of fisherfolk and community members who rely on fishing as a main source of livelihood will be adversely affected by some of the Project activities.

14. They claim that as a result of such activities, the fisherfolk will have smaller areas of the beach to access, which will impede their fishing activities and reduce the landing space for their boats. Additionally, the Requesters claim that the Project is disregarding the alternative of dredging and replenishing the sand beach areas that they say would stabilize coastal erosion and allow fishermen and residents to remain on the beach to continue their fishing activities.

15. The Requesters are also concerned about the alleged evictions and the related involuntary resettlement process that they attribute to the Project. According to them, the Government issued a statement (“*communiqué*”) asking communities to vacate their houses and lands. The Requesters allege that this is related to the Project's intent to relocate approximately 1,000 households along the Togolese coast. The Requesters allege that some houses have been marked for resettlement without explanation, while other households received the *communiqué* or a visit from law

enforcement agents or authorities who told them that they would have to leave their properties for the purposes of the Project. They claim that some PAPs have long held titles to the properties they are being told to vacate.

16. Additionally, the Requesters claim that, to date, insufficient information has been provided to PAPs. They claim that the PAPs were not informed adequately about the resettlement process and related compensation. They state that the results of a survey, which was conducted covering some of the PAPs, was not made available to them. The Requesters claim that meaningful consultations with the communities were not held, but rather that isolated meetings took place with selected individuals, including community leaders.

#### **D. Summary of the Management Response**

17. Management submitted its Response on October 7, 2021. It is summarized below, and the full Response is attached to this report as Annex 2. The Management Response includes a map showing the Project area vis-a-vis the location of other previous or current projects funded by the International Finance Corporation and the African Development Bank.

18. The Management Response states that Management has carefully reviewed the Request for Inspection and concluded that the Requesters' concerns mainly relate to government interventions that are unrelated to the Project.<sup>6</sup> Management adds that the Bank has followed the policies and procedures applicable to the matters raised by the Request and that it believes that the Requesters' rights or interests have not been, nor will they be, directly and adversely affected by a failure of the Bank to implement its policies and procedures.<sup>7</sup>

19. **Notices of Eviction or Potential Eviction.** According to the Management Response, WACA does not support the eviction of any residents.<sup>8</sup> Management states the Project's Legal Agreement requires that any land acquisition physical resettlement or economic displacement be commensurate with the needs of the Project only.<sup>9</sup>

20. Management states that the Government issued two *communiqués*.<sup>10</sup> The first, dated August 31, 2020, requested people illegally occupying the coastal area to leave within six months. The second, dated January 28, 2021, was a reminder that residents should vacate the area by March 3, 2021.<sup>11</sup> According to Management, the two *communiqués* are to enforce the maritime public domain law and are not related to or required by the Project.<sup>12</sup> According to Management, the *communiqués* are based on a pre-existing Togolese law (*Loi No 2016-028 du 11/10/2016 Portant Code de la Marine Marchande*, Article 16). According to Management, the Government of Togo has confirmed to the Bank the suspension of both *communiqués*' implementation.<sup>13</sup>

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<sup>6</sup> Management Response, p. 9, para. 29.

<sup>7</sup> Management Response, p. 18, para. 59.

<sup>8</sup> Management Response, p. 19.

<sup>9</sup> Management Response, p. 11, para. 36.

<sup>10</sup> Management Response, p. 11, para. 38.

<sup>11</sup> Management Response, p. 7, para. 23.

<sup>12</sup> Management Response, p. 20.

<sup>13</sup> Management Response, p. 20.

21. **Concerns about the Involuntary Resettlement Process.** Management states that the civil works in this Project are not expected to require a significant amount of permanent physical or economic displacement and that such impacts will be assessed in line with Bank policy.<sup>14</sup> Management notes a site-specific Resettlement Action Plan (RAP) is being prepared and will cover impacts directly related to the construction of the groynes, as well as any temporary impact related to the establishment of a safety zone around these groynes.<sup>15</sup>

22. Management states that two types of shore protection structures, with a relatively small footprint, were selected based on feasibility studies: (i) small-scale emergency coastal protection consisting of vertically sunk-in concrete pipes; and (ii) coastal protection works to rehabilitate and expand breakwaters and existing groynes, fill abandoned lagoon arms with sand and revegetation, and the construction of new groynes.<sup>16</sup> Management notes that an environmental and social screening was conducted to identify environmental and social measures to be taken prior to installing the pipes, and that such measures were incorporated as environmental health and safety clauses in the work contracts.<sup>17</sup>

23. Management claims the Project will not adversely affect fisherfolk, residents, or property.<sup>18</sup> According to Management, any land acquisition, involuntary resettlement or economic displacement required for the implementation of the Project activities must be governed by a Resettlement Policy Framework (RPF) and applicable Bank policy.<sup>19</sup> The RPF for Togo was prepared and approved in November 2017.<sup>20</sup> Furthermore, Management notes the marking of houses described in the Request is not related to the Project since the physical resettlement processes for the Project has not yet started and the draft RAP will be carefully reviewed by Bank team.<sup>21</sup> Management states that consultation will be carried out on the RAP once it is cleared by the Bank, and that the Bank is working with the Borrower to enhance communication and outreach to address this situation.<sup>22</sup> Management notes that a final version of the RAP will be reviewed by the Bank and will require a no-objection before it is considered ready for implementation.<sup>23</sup>

24. Management claims the Project-level Grievance Redress Mechanism (GRM) is operational and will continue to be available to all stakeholders during the RAP preparation and implementation, as well as during the Project's life cycle.<sup>24</sup> Management states the RAP census and surveys of the potential PAPs have begun but have not been completed. Management notes that agreement on the compensation package must be obtained from any person or household affected by the implementation of the civil works prior to the start of the works.<sup>25</sup>

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<sup>14</sup> Management Response, p. 11, para. 36.

<sup>15</sup> Management Response, p. 11, para.37.

<sup>16</sup> Management Response, p. 12, para. 42.

<sup>17</sup> Management Response, p. 13, para. 46.

<sup>18</sup> Management Response - Annex 1, p. 22.

<sup>19</sup> Management Response, p. 8, para. 46.

<sup>20</sup> Management Response, p. 6, para. 25.

<sup>21</sup> Management Response - Annex 1, pp. 24 and 25.

<sup>22</sup> Management Response, p. vi.

<sup>23</sup> Management Response, p. 15, para. 51.

<sup>24</sup> Management Response, p. 15, para. 51.

<sup>25</sup> Management Response, p. 16.

25. **Alleged Impact on Artisanal Fishing and Livelihoods.** Management claims the Project will not cause permanent adverse impacts on artisanal fishing activities as the civil works will not limit access to the shore or fisheries or block access to the sea front, but rather increase the beach's width by around 30 meters, instead of an expected loss from erosion of 40 meters over the next 15 years.<sup>26</sup> According to Management, the Project aims to strengthen targeted communities' resilience by securing the beach, providing greater access to fishing activities, and protecting an estimated 4,600 households from the impacts of coastal erosion.<sup>27</sup> Management also claims that any potential temporary access restrictions will be assessed and compensated, as may be warranted.<sup>28</sup>

26. Management states that six small-scale emergency coastal protection sites, which consist of precast concrete pipes ("*faux puits*"), are installed upright on the beach, anchored to bedrock, and filled with sand for immediate short-term protection of homes and livelihoods.<sup>29</sup> According to Management, these *faux puits* intend to help retain beach sand behind them and provide a short-term solution in Tango, Gbodjomé, Nimagna, Adissem, Dévikinmé.<sup>30</sup> Management notes that the contractor is now putting in place, as per local fisherfolk's request, two 50-meter corridors that will allow them to land their boats for maintenance in Adissem.<sup>31</sup> The contractor is also in the process of repositioning the pipes and cleaning up the two sites in Dévikinmé that had been completed but were damaged by strong tides.<sup>32</sup>

27. **Alleged Lack of Information and Consultation.** The Management Response states the site-specific Environmental and Social Impact Assessment (ESIA) and RAP for the Agbodrafo-Aného coastal protection works are currently under preparation and that consultations on these instruments have just begun.<sup>33</sup> According to Management, the consultations mentioned in the Request refer to the preparation process for the Project's framework documents (Environmental and Social Management Framework (ESMF)/RPF), which were conducted in several locations in the broad Project area, and in Lomé in October 2017.<sup>34</sup> Management notes that neither Project sites nor activities had been finalized at that point, therefore, the consultations were not site-specific nor focused on specific activities.<sup>35</sup> According to Management, the approved RPF and ESMF were publicly disclosed in-country and at the Bank's Infoshop in 2017 and contained details regarding potential categories of PAPs and sites and possible livelihood impacts, as well as details on the process to be used in each WACA country to prepare the site-specific RAPs.<sup>36</sup> Management adds that the local communities were consulted on March 10, 2020, regarding the selection of six small-scale emergency coastal protection sites.<sup>37</sup>

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<sup>26</sup> Management Response - Annex 1, p. 19.

<sup>27</sup> Management Response, p. 12, para. 41.

<sup>28</sup> Management Response, p. 12, para. 41.

<sup>29</sup> Management Response, p. 12, para. 43.

<sup>30</sup> Management Response, p. 12, para. 43.

<sup>31</sup> Management Response, p. 13, para. 45.

<sup>32</sup> Management Response, p. 13, para. 45.

<sup>33</sup> Management Response, p. vi, para. ix.

<sup>34</sup> Management Response - Annex 1, p. 27.

<sup>35</sup> Management Response - Annex 1, p. 27.

<sup>36</sup> Management Response, p. 15, para. 49.

<sup>37</sup> Management Response - Annex 1, p. 21.

28. Management states the ESIA will focus on the discrete Project area, where new groynes will be built and existing groynes will be rehabilitated, and involves direct consultation with PAPs and communities to ensure that the assessment of the impacts and methodology to determine eligibility and valuation of assets is as comprehensive and complete as possible.<sup>38</sup> Management states that any discussions held with PAPs and local communities are preliminary and not final determinations of eligibility.<sup>39</sup> According to Management, these initial consultations were carried out by the Borrower and have now been stopped at the Bank's request until the Bank-cleared RAP is ready to be consulted upon.<sup>40</sup> According to Management, once the surveys and draft RAP are prepared, they will be discussed and consulted upon with PAPs as part of the RAP consultation process, and then finalized.

29. **Project Alternatives.** The Management Response states the reported loss of beach access is due to coastal erosion, a natural and human-induced phenomenon that pre-dates the Project and has gradually worsened due to construction on the coast over the years.<sup>41</sup> According to the Management Response, the Project considered a series of alternatives as part of a feasibility study.<sup>42</sup> These options were further analyzed with detailed modeling of the performance of the various options over time.<sup>43</sup> Management notes that the beach-replenishment-only option, as suggested in the Request, is not viable based on scientific and technical studies.<sup>44</sup> Management notes that without groynes to slow or block the sediment flow, the replenished sand would quickly vanish, failing to protect the coastal communities from continued erosion.<sup>45</sup> Management states the project will finance beach replenishment, with sand obtained from deep-sea dredging, to fill the spaces between the groynes.<sup>46</sup>

30. **Confusion with Unrelated Activities.** Management notes that two of the villages mentioned in the Request, Avepozo and Kpogan, are not in the Project area and possibly pertain to other projects' interventions.<sup>47</sup> Management recognizes the need for the Government to provide timely and accessible information on the different government interventions that also address coastal erosion, such as the Lomé–Cotonou Road Rehabilitation and Coastal Protection Project and the preparation of Togo's Coastal Master Plan, some of which are supported by other developmental partners.<sup>48</sup>

31. **Going Forward.** The Management Response concludes with the Bank's commitment to supporting the Government in the implementation of the Project, a recognition for the need to maintain a strong engagement with the PAPs, and a list of actions.<sup>49</sup> These actions include: (i) a social audit to assess any unintended impacts that may have resulted from the temporary access

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<sup>38</sup> Management Response, p. 15, para. 50.

<sup>39</sup> Management Response, p. 15, para. 51.

<sup>40</sup> Management Response, p. 15, para. 51.

<sup>41</sup> Management Response, p. vii, para. xi.

<sup>42</sup> Management Response - Annex 1, p. 23.

<sup>43</sup> Management Response - Annex 1, p. 23.

<sup>44</sup> Management Response, p. vii, para. x.

<sup>45</sup> Management Response, p. 16, para. 54.

<sup>46</sup> Management Response, p. vi, para. x.

<sup>47</sup> Management Response, p. 17, para 55.

<sup>48</sup> Management Response, p. 17, paras. 56 and 57.

<sup>49</sup> Management Response, p. 17, para. 58.

restrictions during the emergency works; (ii) adequate options to ensure free access to the beach and avoid/limit any interference with boat landing and fishing activities; (iii) piloting the Local Action and Citizen Engagement 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) a better targeted and more proactive information campaign for stakeholders and local communities regarding coastal zone development challenges in Togo.<sup>50</sup>

## **E. Panel Review of the Request and Management Response, and Eligibility Assessment**

32. Panel Member Ramanie Kunanayagam, Senior Operations Officer Serge Selwan and Analyst Camila Jorge do Amaral visited Togo from October 20 to 27, 2021. The Panel team held meetings in Lomé and along the coast of Togo. They met with representatives of the World Bank Country Office, as well as with the Minister and Secretary General of the Presidency, the Director General of the Ministry of Environment and Forest Resources, the Minister of Maritime Economy, Fisheries and Coastal Protection and with the PIU. The Panel also met with officials of the municipalities of Golfe 4 and Lac 1 and Lac 3 and several local authorities and representatives in the villages and communities it visited. Further, the Panel met with the Requesters, other potentially affected community members and civil society representatives, and conducted meetings and walkthroughs in the villages of Kpémé, Edoh Kopé, Agbodrafo, Dévikinmé, Tango, Gbodjomé, Agbavi, Adissem, and Kpogan.

33. The Panel wishes to express its appreciation to all those mentioned above for sharing their views and perspectives. The Panel also wishes to express its appreciation to the World Bank Country Office staff in Lomé for their assistance with logistical arrangements. The Panel developed its own stringent COVID-19-related protocols, in addition to following national and Bank protocols, for the purposes of this eligibility visit. This included distribution of masks and hand sanitizers in all meetings, when necessary, and respecting relevant physical distancing. The Panel appreciated adherence to all COVID-19 protocols by government officials, Bank staff and community members.

34. The Panel's review is based on information presented in the Request, the Management Response, relevant Project documents, and information gathered during the site visit. The following review covers the Panel's determination of the technical eligibility of the Request according to the criteria set forth in the Panel Resolution (subsection E.1), observations on other factors (subsection E.2), and the Panel's review (subsection E.3) supporting the Panel's recommendation.

### **E.1. Determination of Technical Eligibility**

35. The Panel is satisfied that the Request meets the six technical eligibility criteria of the Panel Resolution concerning most of the issues raised in the Request, as presented below.<sup>51</sup> The Panel notes that its determination of technical eligibility, which is a set of verifiable facts focusing to a large extent on the content of the Request as articulated by the Requesters, does not involve the Panel's assessment of the substance of the claims made in the Request.

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<sup>50</sup> Management Response, pp. 17 and 18.

<sup>51</sup> The 2020 Inspection Panel Resolution, para. 29.

- Criterion (a): *“The affected party consists of any two or more persons (the “requesters”) with common interests or concerns and who are in the borrower’s territory.”* The Panel has verified that the Request was submitted by at least two affected community members, as representatives and signatories, who are living in villages affected by the Project along the coast of Togo and who claim to be affected by the Project. The Panel therefore considers this criterion met.
- Criterion (b): *“The Request does assert in substance that a serious violation by the Bank of its operational policies and procedures has or is likely to have a material adverse effect on the requesters.”* The Request alleges serious harm related to (i) threat of eviction, (ii) impact on access to the beach affecting their fishing activities and livelihood, (iii) concerns about the involuntary resettlement process, (iv) project information and consultation; and (v) lack of analysis of alternatives. The Panel considers this criterion is met with regard to the last four issues.

Concerning the first, 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. This is further elaborated below.

- Criterion (c): *“The Request does assert that its subject matter has been brought to Management’s attention and that, in the requesters’ view, Management has failed to respond adequately demonstrating that it has followed or is taking steps to follow the Bank’s policies and procedures.”* The Request includes copies of the correspondence, in French, between the community members and the Bank from March and June 2021 raising concerns related to beach access and involuntary resettlement. The Panel is thus satisfied that this criterion is met.
- Criterion (d): *“The matter is not related to procurement.”* The allegations raised in this Request relate to social and environmental issues, and not to procurement. Hence, this criterion is met.
- Criterion (e): *“For projects approved by the Executive Directors before the date of this Resolution [the 2020 Panel Resolution, dated September 8, 2020], the related loan has not been closed or substantially disbursed or for projects approved by the Executive Directors on or after the date of this Resolution fifteen months have not yet passed from the date the related loan has been closed.”* At the time of receipt of the Request, the Project was 13.1 percent disbursed, and the closing date of the Project is set for December 31, 2023. Therefore, this criterion is met.
- Criterion (f): *“The Panel has not previously made a recommendation on the subject matter or, if it has, that the request does assert that there is new evidence or circumstances not known at the time of the prior request.”* The Panel has not made a recommendation on the issues raised in the Request, and thus this criterion is met.

## E.2. Panel Observations Relevant to its Recommendation

36. In making its recommendation to the Board and in line with its Operating Procedures, the Panel considers the following factors. First, whether the alleged harm and possible non-compliance by the Bank with its operational policies and procedures may be of a serious character. Second, whether there is a plausible causal link between the harm alleged in the Request and the project. Third, 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. Below, the Panel records its preliminary observations on the alleged harm and compliance, noting that in doing so it is not making any definitive assessment of the Bank's compliance with its policies and procedures and any adverse material effect this may have caused.

37. The Panel observes that the Requesters, who have witnessed the sea take away their or their neighbors' properties and push them further inland, are supportive of the Project and recognize its necessity to build resilience against sea intrusion and coastal erosion. They are willing to move and in some instances are eager to do so but are concerned with what they perceive to be an information vacuum and uncertainty about loss of livelihood, compensation or relocation sites.

38. **Notices of Eviction or Potential Eviction.** The Panel noted that some community members are concerned about evictions either having seen or heard about the *communiqué* requesting people “illegally” occupying the coastal area under the 2016 maritime public domain law to leave the area within six months. Two inter-ministerial *communiqués* were issued in this regard; one in August 2020 and the other January 2021.

39. The Panel observes that there is considerable confusion over several overlapping projects in the coastal area and the apparent lack of coordination and communication between the various agencies supporting these activities in communicating this to the communities. This has led the community to associate many of these impacts with the Project. The Panel observed this during its meeting with various communities in the villages it visited, with the issue of eviction being flagged by some of the community leaders. The Panel also heard there had been recent communication over the local radio clarifying that the inter-ministerial *communiqués* to vacate the area under the maritime public domain are not linked to WACA.

40. The Panel has not seen or received any credible written evidence linking these notices of eviction to the Project. The Panel notes Management's assurances that WACA will not support any potential eviction resulting from the government enforcement of the *communiqués* or other laws. The Panel has seen the Government's letter dated October 5, 2021, confirming that the *communiqués* are unrelated to WACA and assuring the suspension of the implementation of the *communiqués* until further notice.

41. **Concerns about the Involuntary Resettlement Process.** During the Panel's visit, the Requesters and PAPs raised several questions and concerns about the potential resettlement related to WACA. Their concerns relate particularly to lack of clarity as to who will be affected and the criteria for resettlement, how the resettlement process will be implemented, where they are to be resettled, what the basis for compensation is, how the compensation valuation is to be calculated,

and the ranges of compensation values. The timing and sequencing of the resettlement is also of concern.

42. The Panel observed that this uncertainty was causing stress at both individual and collective levels in the community. The Panel was shown several houses and structures which had been marked in red with “WT” (WACA Togo) as earmarked for resettlement under WACA. The Panel was also shown houses and structures where the red “WT” mark was overwritten by a white “X” mark. Community members did not understand the difference between these marks and the implications for them. Some houses also had a red arrow which they understood to mean were changes in structure or land take. The owners of these houses stated they were not given any clear information about what the markings represent.

43. The Panel was also told during a community meeting in one of the villages it visited that a group of consultants conducted a survey/census over several days during a collective community meeting on the beach. In this village, all those the Panel spoke to appeared to have participated in this meeting. In another village the Panel visited, the Panel was shown by household owners the “WT” signs marking their houses, which they believed identified them for resettlement, but they said they were not asked any household information questions and were not included in a survey. In some of the villages the Panel visited, community members had heard about census activities but stated that they were not invited to participate in any census or survey activities. This has further increased their anxiety.

44. At a meeting with local authorities, the Panel was shown a copy of the June 2021 version of the RAP. The Panel was also informed at meetings with national authorities and at a meeting with the PIU that the RAP was submitted to the World Bank on October 8, 2021. Management indicated that this was the September 2021 version. The Panel was also told by the PIU and national government authorities that there are approximately 63 households targeted for resettlement. This number correlates to information shared by Management. Management however, clarified to the Panel that the draft RAP is under review as its footprint is likely to change and therefore the number of PAPs could change. According to the Management Response, the September RAP covers the Project-affected area stretching from Agbodrafo to Aného.

45. **Artisanal Fishing and Livelihood.** The Panel observed that artisanal fishing is the “lifeblood” of the communities living along the coast. The Panel was told by all the communities and local authorities it spoke to that the communities’ lives and the sea were intertwined. Almost all aspects of the communities’ lives and livelihoods have a connection to the sea and for most, this starts at childhood, involves both men and women and different generations with specific and varying roles based on gender and age group.

46. The Panel also observed that most of these fisherfolk did not appear to have other skills that are easily transferable. Other livelihood activities such as small-scale agriculture, including gardens or produce from trees, are used only as a supplementary source of income. Many in the fishing communities also stated that although fishing does not offer them a large income, the daily catches are a source of food security and provides a basic and regular income. They stated that fishing activities support a sizable part of the coastal population with a large percentage of fish and seafood, including anchovies, sardines, tuna, shrimps, crabs and shellfish.

47. The Panel observed that artisanal fisherfolk use different fishing techniques, including the *Senne de Plage*, *Senne Tournante*, and *Tunga*.<sup>52</sup> 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. These techniques have been handed down and learned from one generation to another and are part of the living heritage of these communities. All these techniques require strong knowledge and understanding of the sea and the movement and direction of the currents and tides. The use of the beach is of particular significance regarding these fishing techniques.

48. The *Senne de Plage* is a fishing technique that mobilizes large groups of approximately 25 to 45 fishermen who line up, pulling opposite ends of two ropes that are attached to two submerged “anchors” or “*pieds*”. First, the fishermen swim into the sea to drop one “*pie*” at a location and then swim to another location to drop the second “*pie*”. The location where the first “*pie*” is dropped is very important and is determined based on the current’s direction. At times, a single *Senne de Plage* can cover up to three kilometers of the beach, stretching from Agbodrafo to Kpémé or vice versa. Each fisherman plays a different role during the fishing activity; some are responsible for singing motivational chants, others oversee the directions of the currents and still others monitor the nets while a large line of fishermen pulls the ropes for very long hours. Fisherwomen and younger members of the community play an important role participating in the retrieval of nets and transporting the heavy fish catch. The Panel learned that *Senne de Plage* is practiced mainly by fishing teams in villages located between Agbodrafo to Aného, and that there are seven teams in Kpémé and three in Agbodrafo.

49. The *Senne Tournante* is a technique that involves a team of 20 to 25 fishermen on a large boat of 14 to 22 meters in length. These fishermen closely monitor the water searching for fish. Once they spot a catch, they follow it and position their boat before throwing their net to catch it. They then circle around with the boat and return to the starting point, where the net was first dropped. According to the fishermen, this process takes several hours.

50. The *Tunga* technique involves around six to eight fishermen per boat who fish very early before sunrise. These fishermen release their fishing nets and wait for approximately 3 to 4 hours to catch fish. This technique allows some of the fishermen to work double shifts and also take part in other fishing activities or groups.

51. The Panel observed 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. This includes triaging the fish by size and species, and then trading and processing the fish. A part of the catch is distributed to the boat owners and the fishermen who took part in the actual fishing, and the rest is sold.

52. The fisherwomen play different roles with regard to the catch and the downstream activities. Fisherwomen who are involved in the hauling and triage are known as “*aide-pêcheurs*” (fishermen assistants). This category may also include children learning the trade. Women known

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<sup>52</sup> The communities mentioned other types of fishing, such as *Pêche en Ligne* and *Senne Dormante* (“gill net”) but these are less practiced.

as “fish transformers” buy the fish to process, smoke and resell on the market. In some cases, women play more than one role. The Panel also observed there were women with characteristics of vulnerability, such as female-headed households, who are very dependent on these activities for their day-to-day survival. The Panel met with a widow who had several young children; she told the Panel that she was responsible for feeding her entire family and had no other alternative livelihood activities.

53. The Panel observed that both men and women could be fish traders, buying and selling fresh fish. When the fish catch is brought ashore, a number of motorcycle taxis gather on the beach to transport the fish to market. The Panel was unable to determine the depth and length of this microeconomy and related supply chain activities. Nevertheless, the Panel recognizes its significance to the fishing community.

54. The Panel observed that the potential impact of the Project on artisanal fishing can vary from area to area based on the type of Project intervention and fishing techniques used. For example, in Kpémé the *Senne de Plage* fishermen are concerned that the positioning of the groynes can interfere with their fishing based on the range required and the space between the groynes and how far into the sea they will be built. While they acknowledge that they would have to work around this, they were also concerned that the groynes could have an impact on their overall productivity and the volume of catch they can bring ashore daily. They told the Panel that they would want to be compensated for the disruption caused during construction for the entire stretch of beach between the groynes.

55. The fishermen also mentioned the importance of how the groynes are constructed. They hoped the groynes would have a flat surface and would include the use of stone blocks to minimize accidents and injury to them while performing fishing activities. They stated that the rocks forming the groynes should not be sharp. In one of the villages, they pointed to a groyne built by a “*rich man*” as an example of a well-constructed groyne from their perspective. The Panel observed that this groyne had stone-blocks on the top of it, thereby creating a flat surface.

56. Another impact the community mentioned regarding the *Tunga* and *Senne Tournante* fishing techniques is the possible impact of deep-sea dredging on their fishing activities. They mentioned a previous experience when large boats were installing fiber cables in the sea and a safety zone was created which the fishermen could not enter. They are concerned that this will be repeated during the sand-dredging activities.

57. The Panel also learned that fishermen move up and down the coast to fish and go to villages where fishing prospects were better or where certain techniques that could not be employed in their own village could be used in another village more conducive to that technique.

58. **Emergency works.** The community told the Panel that they found the emergency work to be disruptive in terms of their livelihood activities and they did not believe it addressed the erosion challenges. 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 community asked the Panel why an environmental and social impact assessment had not been conducted prior to the commencement of the works. The Panel understood from government authorities that these

emergency works were decided prior to October 2020. The Panel understands from Management that there was an environmental and social screening done prior to the commencement of these works. In communications to the Panel, Management committed to appraise the environmental and social screening of the emergency protection works.

59. With regard to the emergency works in Adissem, discussed further below, the Panel observed that with the exception of the two 50-meter corridors that had been created, the beach is full of concrete pipes (“*faux puits*”) and other construction material. The community told the Panel that the length of their boats could vary from 8 to 22 meters depending on whether they use the *Tunga* or *Senne Tournante* technique. Therefore, the community view was that the corridors were inadequate as landing sites for their boats. Some villages harbored more than 20 boats. The community stated that as a result of the beach being blocked, they now have a smaller volume of catch than previously. They also stated that during the construction activities they were unable to take their boats to sea for an extended period. The Panel noted that some of the concrete pipes forming the “*faux puits*” were marked with dates stretching from February to May 2021. The Panel was also told by the community that this impact also meant that the trading activities that take place on the beach do not happen as they did previously.

60. The community also stated that their only access to the sea – through the two corridors – limited their opportunity to go out to sea and how much time they could spend at sea as their departure and landing spaces are now confined. Previously, based on the tide and direction of the current, they could select the most appropriate place to take out and land their boats on a side conducive to their activity. This, they said, is no longer an option for them.

61. The Panel was also told by this community that a contractor had not paid them wages for several months for their work on the construction of the pipes; however, the community confirmed that they have now been paid. This is consistent with what the Panel heard from national authorities and the PIU.

62. **Consultation and disclosure of information.** The Panel was told by the community that they have received very little information on the Project’s scope of activities and expected timelines. The Panel noted that the communities did not know about the geographic scope of the Project and did not understand why certain villages were included and others not; they stated that it was the same coast. None of the people the Panel met with in the communities had seen a map defining the Project geography. The communities expressed to the Panel that there was a feeling of uncertainty and fear as they do not know what would happen to them as a result of the Project.

63. The Panel was told by Management and government authorities that there were multiple projects and activities taking place along the coast and that they are at different stages of development. The Panel was also told by authorities at the national level that more work was needed on communication and that they understood the sense of confusion by the communities regarding some of these activities and not knowing what impact is related to which activity.

64. The Panel was told by all communities it spoke to and by the authorities at both local and national levels that erosion was a very real threat to their existence. The Panel was shown houses that were now in ruins and what used to be the public square of a particular village that was now

engulfed in the sea. The community told the Panel that these houses belonged to their grandparents. The communities described the impact of erosion to the Panel as “the sea eating our land.” They added that “the sea is pushing us further and further back” and therefore communities had nowhere to go. Everyone the Panel spoke with, including the Requesters and their representatives, emphasized the importance of the Project and stated that they saw its benefit. The community’s concerns are largely on the social impact of the Project. They are concerned about a perceived lack of social impact assessment and a lack of understanding of how the Project works, the temporary and permanent impact, and how it could affect their livelihoods. The Panel was asked several times if an ESIA was done for this Project. The Panel was also asked that if there was an ESIA why was the community not informed about it, consulted on it, and given access to its findings. One of the chiefs in the villages told the Panel it was not realistic to have one copy of the ESIA in the local government office and expect the community to be able to access it, let alone read, understand, and digest an “800-page” document.

65. One of the village chiefs the Panel met with said that while he was invited to one of the consultation meetings held at Agbodrafo, it seemed to him a random meeting with no follow-up or detailed information provided before or after. The chief mentioned that usually the information is garnered through the chiefs talking to each other and pooling information.

66. Finally, the Panel observed that most community members are not aware of the existence of a community-level GRM. They informed the Panel that if they wished to make a complaint, they would have to travel to Agbodrafo. The PIU informed the Panel that a GRM would be established at seven levels<sup>53</sup> and the process to go through them would last no longer than a month. Implementation of the different levels of the GRM was to be completed by the end of October 2021.

67. **Sand Dredging.** The Panel notes the Requesters hold a specific view on sand dredging as a technical solution to the erosion challenges. During discussions with the Panel, community members stated that sand dredging was done in Keta, Ghana, about 30 years ago. They claim that this solution has worked. The Panel also notes from the Management Response that the Project has examined the various technical options and found a dredging-only option to be non-feasible. The Panel further observes that the communities are unaware of this analysis and they stated that the decision around options was not communicated to them.

### **E.3. The Panel’s Review**

68. The Panel acknowledges the serious concerns of the Requesters and appreciates the supplemental information received during the eligibility visit and the productive discussions with them, as well as the trust they have placed in the Panel’s process. The Panel also acknowledges Management’s detailed response to the issues raised in the Request and willingness to provide further information.

69. The Panel recognizes that the Project is needed and welcomed by the different stakeholders in Togo who recognize that it is critical to addressing the immediate threat they are facing as a

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<sup>53</sup> These seven levels include the *quartier* (neighborhood), village, *commune*, *canton*, *préfecture*, *région*, and the PIU.

result of the eroding coastline. However, the Panel notes the concerns raised by the community, and more specifically the artisanal fisherfolk, with regard to alleged current and potential impact and the allegations concerning lack of information about the Project and lack of consultation with community members.

70. **Alleged Serious Harm.** The Panel has spoken to communities, as well as local authorities, about the community's dependence on artisanal fishing activities and its importance to sustaining these communities. All stakeholders, including government officials, told the Panel that artisanal fishing is the main form of fishing in Togo. The fisherfolk indicated to the Panel how they believed they could be impacted by the Project. The Panel considers the alleged potential impact of the Project on the livelihood of these communities, as described in detail in the observations above, to be of serious character considering the vulnerability of the population.

71. The Panel considers that the alleged harm relating to the emergency works may be related to the livelihood of community members. The Panel notes that Management committed to conduct a social audit to assess whether alleged harm occurred and the extent of it with the intent of compensating if any such harm did occur. The Panel considers this alleged harm to be of serious nature.

72. Further, the Panel has considered the views of all stakeholders about the consultation and disclosure of information relating to the Project, where all stakeholders acknowledged that communication and information sharing had scope for improvement. The Panel has also considered the community's views that there has been very little consultation on the issues that are of concern to them, including Project alternatives such as sand dredging, that they have not been engaged in a meaningful way in the preparation of the RAP and ESIA, and their fear that both temporary and permanent impacts on their livelihood are not well understood. The Panel considers this to be a serious allegation of harm and possible non-compliance.

73. **Plausible Link between Alleged Harms and Project.** The Panel has reviewed the information related to the issue of evictions and notes that there is no link between the two inter-ministerial *communiqués* about evictions relating the marine public domain and the Project.

74. The Panel notes from its review that, with the exception of claims relating to evictions, the allegations raised with regard to resettlement, livelihood impact, and consultation and disclosure of information are plausibly linked to the Project. The Panel also notes the Requesters' concerns over potential resettlement and livelihood impact are based on fear and uncertainty of not knowing the scope and area of influence of the activities and how they would be affected by the Project. The Panel also notes Management's Response that the scope and extent of the impact are yet to be identified and that the RAP and ESIA are still under review by the Bank.

75. The Panel notes Management's Response that the RAP has not been reviewed or cleared by the Bank. Therefore, it would be premature for the Panel to comment on the RAP. The Panel notes Management's point during discussion that the RAP's footprint is likely to change. This will affect the scope of the current RAP. The Panel notes that while one of the principal requirements of OP 4.12 is that resettlement needs to be minimized, this should be weighed against the context of associated livelihood impact.

76. **Management Actions.** Management has committed to a list of actions intended to address the concerns and allegations raised.<sup>54</sup> These include:

- Completing Management’s ongoing review of the ESIA and RAP.
- Working 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 both landing and fishing activities that may result from the Project’s civil works.
- Commissioning a social audit on the emergency works to assess any unintended impact that may have resulted from the temporary access restrictions during the emergency construction works and then sharing the results with the PIU to identify unintended impact that may require compensation. This social audit is intended to be completed by March 2022.
- 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. This is currently under preparation and will be included in the Project’s annual workplan by December 2021.
- Conducting an implementation support mission in November 2021 to review the status of all actions related to the Project, including those resulting from the most recent technical mission of September 20 to 22, 2021, actions resulting from the Management Response, and the need for new provisions/actions in the 2021 WACA annual plan and budget.
- Piloting the Local Action and Citizen Engagement 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.
- Conducting a mid-term review on or after January 15, 2022, with the ability to make changes to address stakeholders’ concerns.

77. **Conclusion.** The Panel notes that apart from the emergency protection area, most of the Requesters’ concerns relate to potential alleged harm. The Panel notes Management has committed to a list of actions to assess, mitigate and make changes to address each of the concerns raised by the communities. The Panel further notes the actions committed to by Management are defined and measurable. The Panel also notes that several of the actions are timebound. Regarding the emergency protection area, Management has committed to several actions including a social audit to assess unintended impact that may require compensation and to share the audit findings with the PIU to address these impacts. Considering that the scope of the area of influence of the activities in the RAP and ESIA have not been cleared by the World Bank, it would be premature for the Panel to comment on them.

## **F. Recommendation**

78. The Panel notes that the Requesters and the Request for Inspection, with the exception of the allegations regarding evictions, meet the technical eligibility criteria set forth in the Panel

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<sup>54</sup> Management Response, p. 17, para. 58.

Resolution. The Panel considers the remaining alleged harm to be of serious character and plausibly linked to the Project, and that the Request raises important issues of alleged harm and potential policy non-compliance related to the Bank's policies on Environmental Assessment, OP/BP 4.01, Involuntary Resettlement, OP/BP 4.12, and Investment Project Financing, OP/BP 10.00. The Panel also notes the actions Management committed to with the intention of addressing the concerns and allegations raised.

79. In light of this, the Panel is deferring its recommendation as to whether an investigation is warranted. The Panel will reassess the situation in view of the implementation of these actions and will inform the Board of its recommendation within six months.

80. If the Board of Executive Directors concurs with the Panel's recommendation, the Panel will inform the Requesters and Management accordingly.

# **Annex I**

## **Request for Inspection**



## FORMULAIRE DE DEPOT DE PLAINTE (DEMANDE D'INSPECTION)

### Au:

Secrétaire Exécutif, Panel d'Inspection, Banque Mondiale, MSN: MC 10-1007

1818 H St., NW, Washington, DC 20433, USA. Fax : +1(202)-522-0916. E-mail : [ipanel@worldbank.org](mailto:ipanel@worldbank.org)

### Section 1: Plainte

1. Quel(s) préjudice(s) pensez-vous que le Projet financé par la Banque a causé(s) ou est susceptible de causer à vous ou à votre communauté ? Veuillez s'il vous plaît le(s) décrire le plus précisément possible.

Nous venons par ce présent acte pour faire une demande d'inspection car le projet WACA financé par la Banque IDA (World Banque Group) aurait des répercussion négatif sur nos activité de pêches et litiges fonciers sur l'emprise de la mer. En effet dans les années 2009 les riverains disposaient d'une emprise d'environ 400 mètre et à l'heure où nous vous écrivons cette note nous ne disposons plus que de 20 mètre et l'Etat demande aux riverains de laisser 150 mètre comme emprise alors que l'emprise réelle était rentrée dans la mer avec beaucoup de maison, champs de cocotier.

Malgré toutes les discussions menées avec le bureau local de la Banque nous avons l'impression que la situation se complique par le dernier delais que l'Etat a donné aux riverains de céder les lieux en fin de céder le passage au projet WACA. Ceci bouleverse la communauté qui pense aussi que les activités de la pêche artisanale seront empêchées à cause et prend comme témoin les faits puits de Ggodjomé.

2. Quel est le nom du projet ? (si celui-ci est connu)

Projet WACA

3. Où se situe le projet ? (Veuillez s'il vous plaît donner le nom du pays)

TOGO (sur la côte togolaise)

4. Vivez-vous dans la zone du projet ?

OUI

5. Avez-vous déjà sollicité la Direction de la Banque Mondiale pour leur faire part de vos préoccupations ? Si oui, veuillez s'il vous plaît donner les détails de ces échanges et expliquer pourquoi vous n'êtes pas satisfaits des actions de la Banque pour répondre à vos préoccupations.

Oui, malgré toutes les échanges nous avons l'impression que la Banque veut confier le dossier à l'Etat togolaise.

6. Veuillez, si vous les connaissez, faire la liste de la ou des procédure(s) opérationnelle(s) de la Banque dont vous pensez qu'elle(s) n'a ou n'ont pas été respectée(s).

Nous ne connaissons aucune procédure.

7. Vous attendez-vous à un quelconque type de représailles ou de menaces suite au dépôt de cette plainte ?

Oui

## Section 2: Coordonnées

8. Êtes-vous les auteurs de la plainte ou représentez-vous les auteurs de la plainte ?

Les auteurs de la plainte :  Le ou les représentant(s) des auteurs de la plainte :

9. Souhaitez-vous que le Panel préserve la confidentialité de votre nom et de vos coordonnées ? (Le Panel d'Inspection de partagera ces informations avec personne sans votre accord préalable). Oui  Non

10. Nom des plaignants (Deux noms et signatures sont requis au minimum) :

Plaignant 1		Plaignant 2	
Nom	<input type="text"/>	Nom	<input type="text"/>
Adresse	<input type="text"/>	Adresse	<input type="text"/>
Téléphone	<input type="text"/>	Téléphone	<input type="text"/>
E-mail	<input type="text"/>	E-mail	<input type="text"/>

11. Nous, les signataires de ce formulaire, demandons au Panel d'Inspection de mener une enquête à propos des préjudices décrits ci-dessus.

Signatures (Plus de signatures peuvent être envoyées en pièce-jointe) :

<input type="text"/>	<input type="text"/>
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### REMARQUES :

- Veuillez s'il vous plaît joindre tous documents complémentaires susceptibles d'étayer votre plainte, si ceux-ci sont disponibles.
- Si vous avez une quelconque difficulté à remplir ce formulaire, veuillez s'il vous plaît contacter le Panel d'Inspection à l'adresse suivante : [ipanel@worldbank.org](mailto:ipanel@worldbank.org) ou par téléphone : +1-202-458-2000.

## Translation of the main document of the Request for Inspection

We come by this act to make a request for inspection because the WACA project financed by the Bank IDA (World Bank Group) will have negative repercussions on our fishing activities and land disputes on the coastal areas. In 2009 the residents had about 400 meters and at the time of writing this note we only have 20 meters and the State asked residents to leave 150 meters of shore while the real sea encroachment has affected a lot of houses, fields of coconut palms.

Despite all the discussions with the local Bank office, we have the impression that the situation was complicated by the latest deadline the State has given to the residents to vacate their premises giving way to the WACA project. This upsets the community who also thinks that the activities of artisanal fishing will be prevented and shows as an example the wells of Ggodjomé.

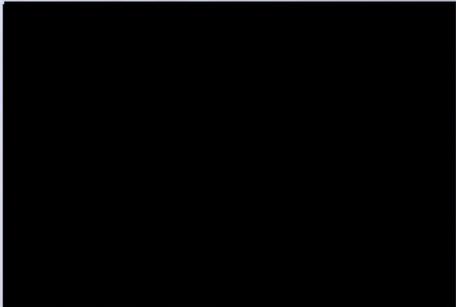


Au Panel d'inspection de  
la banque mondiale

**Objet** : Demande d'adhésion

Je soussigné  demeurant et domicilié à Lomé, héritier d'une maison familiale au nom de   sis à Agbadrafo non loin de l'école primaire coté plage adhère la revendication de droit environnemental sur le projet WACA auprès de panel d'inspection de la banque mondiale.

En foi de quoi se présente la lettre qui est adressée pour servir et valoir ce que de droit.



Fait à Lomé le 27 Août 2021

# PROCURATION

Nous soussignons Monsieur et Dame Pêcheurs et Revendeuses de poissons fumé résident et domicilié à KPEME et ces environs **EDO KOPE, GOUDOUNOU KOPE, DJEKE KOPE...** donnons nos voix et mandat à [REDACTED] afin de nous défendre sur les impacts négatifs du futur projet de la protection de la côte (WACA)

En foi de quoi nous les délivrons cette procuration afin de rendre dans les discussions avec les ONG Ambassade chargé de projet BM, panel inspection..... pour une bonne compensation.

NOM	PRENOMS	SEXE	VILLAGE	SIGN.
[REDACTED]				

Fait à EDO KOPE, le 23 Août 2021

# PROCURATION

Nous soussignons Monsieur et Dame Pêcheurs et Revendeuses de poissons fumé résident et domicilié à KPEME et ces environs **EDO KOPE, GOUDOUNOU KOPE, DJEKE KOPE...** donnons nos voix et mandat à [REDACTED] afin de nous défendre sur les impacts négatifs du futur projet de la protection de la côte (WACA)

En foi de quoi nous les délivrons cette procuration afin de rendre dans les discussions avec les ONG Ambassade chargé de projet BM, panel inspection..... pour une bonne compensation.

NOM	PRENOMS	SEXE	VILLAGE	SIGN.
[REDACTED]				

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Envoyé à partir d'un Smartphone Android avec GMX Mail.

Le [REDACTED] a écrit:

Bonjour M. [REDACTED],

Nous accusons réception de votre deuxième email relatif à la demande d'informations complémentaires sur le projet WACA. Le projet WACA est en train de faire l'étude des impacts environnementaux et sociaux des travaux de protection côtière dont les résultats seront prochainement partagés avec toute la population, y compris les pêcheurs, le long de la côte. Cependant, nous regrettons que vous n'avez pas pris attache avec la coordination du projet WACA comme nous vous l'avons demandé en vous donnant le numéro de téléphone et l'adresse email de la Coordination du projet WACA. En conséquence, nous vous demandons à nouveau de vous rapprocher de la coordination du projet qui pourra vous donner toutes les informations que vous voudrez sur le projet WACA.

En rappel, vous pouvez contacter le projet WACA au Tel. [REDACTED] et email :

[REDACTED].

Veuillez recevoir nos meilleures salutations.

[REDACTED], PhD

Senior Disaster Risk Management Specialist

Urban, Disaster Risk Management, Resilience & Land

T: [REDACTED]

: [REDACTED]

E: [REDACTED]

W: [www.worldbank.org](http://www.worldbank.org)

S: [REDACTED]

From [REDACTED]

Sent: Thursday, June 17, 2021 9:17 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: OBJET : DEMANDE DES INFORMATIONS SUPPLÉMENTAIRES SUR LE PROJET WAKA TOGO

[External]

Cher Monsieur et Dame,

Nous vous remercions pour votre éclaircissement sur notre précédente demande. Car selon certains de nos confrères pêcheurs qui pensent que le projet waka qui est entrain de se réaliser empêcherait les activités de pêche sur le littoral notamment (leur débarquement de pirogues, les filés artisanales...) et demande une expertise au chargés de projet de la Banque Mondiale sur ce projet ainsi que les projets d'Épi rocher.

Nous souhaiterions une dialogue franc d'éclaircissement soit lieu pour que tous les impacts du projet soit enregistré selon les textes prévu par la Banque Mondiale.

Dans l'attente d'une suite favorable, nous vous prions de recevoir nos sincères salutations.

Ci-joint un lien d'une vidéo attestant les FAUX PUIITS

<https://m.youtube.com/watch?v=8awtJveB3lo>

Le 06/04/2021, 09:05 [REDACTED] a écrit:

M. [REDACTED],

Nous accusons réception de votre email relatif à une demande d'information sur le projet WACA ainsi que la décision des autorités de libérer les espaces le long de la côte et je vous en remercie.

Je voudrais vous informer que la Banque mondiale est en train de collecter des informations pour mieux comprendre la situation.

Pour des informations complémentaires sur les activités du projet WACA, je vous prie de vous rapprocher de la coordination du projet, sise au Ministère de l'Environnement et des ressources forestières

(Tel. [REDACTED] ; email [REDACTED]).

Veuillez recevoir nos meilleures salutations.

[REDACTED] PhD

Senior Disaster Risk Management Specialist

Urban, Disaster Risk Management, Resilience & Land

T: [REDACTED]

M: [REDACTED]

: [REDACTED]

W: [www.worldbank.org](http://www.worldbank.org)

S: [REDACTED]

From: [REDACTED]

Sent: Wednesday, March 31, 2021 5:58 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: OBJET : DEMANDE DES INFORMATIONS SUR LE PROJET WAKA TOGO

[External]

M. [REDACTED]

E-mail: [REDACTED]

LOME TOGO

Aux RESPONSABLES

De Projet WAKA (BANQUE MONDIALE TOGO)

OBJET : DEMANDE DES INFORMATIONS SUR LE PROJET WAKA TOGO.

Madme/ Monsieur,

Nous venons par ce présent lettre vous demandez certains éclaircissement par rapport aux Projet WAKA TOGO, nous SOMME LES HABITANTS DU LITORAL précisément de GOUNOU KOPE ET AVEPOZO, qui a été

informer par les autorités de quitter sur le long du littoral avant fin mars 2021. Nous nous souhaitons prendre contact avec la Banque mondiale principal Investisseur sur les sujets de rélogement de nos communautés sur les nouvelles bases opérationnelle de la Banque.

Dans l'entente d'une suite favorable, veuillez croire Madame/Monsieur, l'expression de nos profonds gratitude.

[REDACTED]

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Envoyé à partir d'un Smartphone Android avec GMX Mail.



# **Annex II**

## **Management Response**



**MANAGEMENT RESPONSE TO  
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)**

Management has reviewed the Request for Inspection of the Togo, Western Africa: West Africa Coastal Areas Resilience Investment Project (P162337); Additional Financing – West Africa Coastal Areas Resilience Investment Project (P176313); and Global Environment Facility (P092289), received by the Inspection Panel on August 4, 2021 and registered on September 7, 2021 (RQ21/03). Management has prepared the following response.

October 6, 2021



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### **Map**

- Map 1. IBRD No. 46066, Countries Participating in the WACA Program
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### **Annex**

- Annex 1. Claims and Responses
- Annex 2. News Articles regarding Government Eviction Notices Unrelated to the WACA ResIP

## ABBREVIATIONS AND ACRONYMS

AfDB	African Development Bank
AFD	<i>Agence Française de Développement</i> (French Development Agency)
ANGE	<i>Agence nationale de gestion de l'environnement</i> (National Environmental Management Agency)
Comex	<i>Commission d'Expropriation</i> (National Expropriations Committee)
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
GEF	Global Environment Facility
GRM	Grievance Redress Mechanism
GRS	World Bank Grievance Redress Service
IPN	Inspection Panel
OP	Operational Policy
PDO	Project Development Objective
PIU	Project Implementation Unit
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
WACA ResIP	West Africa Coastal Areas Resilience Investment Project
WAEMU	West Africa Economic and Monetary Union

## EXECUTIVE SUMMARY

### Project

- i. The WACA Resilience Investment Project was approved on April 9, 2018, as a **multi-country regional project** that supports the strengthening of resilience of coastal communities and assets in **six countries**—Benin, Côte d’Ivoire, Mauritania, São Tomé and Príncipe, Senegal, and Togo. Together, these six countries have approximately 2,186 km of coastline, areas of which are particularly vulnerable to erosion, flooding and pollution.
- ii. **Coastal investment component in Togo.** The Project under Component 3 supports two types of coastal investments that aim to prevent coastal erosion and help rebuild the coast by retaining sediments: (i) small-scale emergency coastal protection consisting of vertically sunk-in concrete pipes that secures the coastline, protecting coastal settlements; and (ii) longer-term sustainable coastal protection works to rehabilitate and expand existing groynes and construct new ones.
- iii. **Project status in Togo.** As of August 31, 2021, the disbursement rate was 13.1 percent. Implementation of the main components of the Project have not yet started in Togo. The contract for *coastal protection works from Agbodrafo to Aného* is under Bank review and the Supervision Engineer has been recruited. The works will start only after the ESIA and RAP have been completed and published and the RAP has been implemented. The emergency works to prevent erosion at six sites are 82 percent completed. Two flood control sub-projects have been implemented with communities, eleven social sub-projects are underway, and agreements for seven income-generating activities have been signed. The closing date of the Project is December 31, 2023.

### Request for Inspection

- iv. The Requesters allege that approximately 1,000 households along the coast will be affected by the Project, including fishers, residents, and property owners. They claim the Project will limit beach access to a small strip of land, reducing the space to keep fishing boats. They fear that artisanal fishing and livelihoods will be adversely affected by the Project. Further, they are concerned with involuntary resettlement allegedly attributed to the Project and that community members have been asked to vacate their premises.

### Management’s Response

- v. **Management is acutely aware of the risks West African coastal communities are facing with coastal erosion, flooding and climate change.** This is the reason why the Bank launched the WACA Program with Togo and other countries in 2018. The Program is part of the region’s green, resilient, and inclusive development.
- vi. **Management has carefully reviewed the Request and concluded that the Requesters’ concerns mainly relate to the Government’s intention to move all residents from a 100-m zone at the sea front, which is not connected in any way to the Project nor**

*required for the civil works financed by the Project.* The civil works financed by the Project are relatively small in scale and only a small amount of physical resettlement and economic displacement is expected, some of which will be temporary during construction and some of which will be permanent and related to the safety zone around the structures.

vii. *Management also notes that some of the villages cited in the Request are not located in the Project area and hence will not be affected by Project-related works at all.* This may be caused by a confusion between the Project and other development projects that also address erosion on the Togo coast. These projects are in different locations and are not financed by the Bank, nor are they required for the Project.

viii. *The Project will not have permanent adverse effects on artisanal fishers and their livelihoods.* Rather, the opposite is true: the Project is helping to prevent coastal erosion, and by doing so helping to secure access to the sea for artisanal fishers. The Project's worksites will be temporarily inaccessible to the public during construction for safety reasons, but open space between the sites will be 350-400 meters, which allows for public access to the sea. The works will block the sea front only in very limited places and will not restrict use of the beach for storing boats or fishing. There have been some instances where works or stored materials have interfered with boat landing, but those have been resolved. A social audit will be conducted in connection with the completion of the emergency works and serve to assess any potential impacts from temporary access restrictions resulting from the construction works.

ix. *Consultations and information outreach for the Project have just begun.* The Request may confuse the Project's *framework* documents and its *site-specific plans*. While consultations were held during preparation on the Project's ESMF/RPF with a broad range of stakeholders, the site-specific ESIA and RAPs are still under preparation and will be consulted upon specifically with the affected communities. Management recognizes that information provided by Government agencies to the affected communities made it difficult to separate the activities supported by the Project from the unrelated implementation of government policies or enforcement of national law. In addition, initial consultations were carried out by the Borrower on the basis of an incomplete draft RAP that was neither reviewed nor cleared by the Bank. These consultations have been stopped until the Bank-cleared RAP is ready to be consulted upon. The Bank is working with the Borrower to enhance communication and outreach to address this situation.

x. *The Project considered relevant alternatives – including groynes only, beach replenishment (from dredging) only and combination of groynes and beach replenishment – and selected an option that combines different approaches to achieve the Project's development objective* The Project will finance about 600,000 m<sup>3</sup> of beach sand replenishment to fill the spaces between the groynes, using sand from deep-sea dredging. The selection of the combined option for coastal protection (groynes and beach replenishment) was studied in detail through feasibility studies. This considered costs, the level of protection, lifetime, and potential positive and negative environmental, social and economic impacts. It is important to note that the

beach-replenishment-only option, as suggested in the Request, is not viable based on scientific and technical studies. Without the additional groynes on the shoreline the replenished sand would quickly vanish again and would fail to protect coastal communities from continued erosion.

- xi. ***The reported loss of beach access between 2009 and today, as cited in the Request, is due to coastal erosion that pre-dates the Project.*** Coastal erosion is a natural and human-induced phenomenon that has gradually worsened due to construction on the coast over the last 60 years. Togo loses an average of 2.5 m of beach per year along its 56-km coastline. A specific impact on fishing communities is that wave action has eroded the beach in many areas, exposing sharp rocks that can damage the fishing boats when landing. The Project is designed to make communities less exposed to coastal erosion and the ensuing impacts to their livelihood.
- xii. ***The Government's efforts to remove residents from the country's maritime public domain (100 meters from the high-water mark) is neither part of the Project, nor is it required for the Project.*** The Government has issued two "Communiqués Interministeriels" asking occupants of the maritime public domain to vacate the area within six months. The issuance of these Communiqués has contributed to some confusion between the limited, site-specific impacts expected from the Project and this broader government initiative. The Project does not support any resettlement resulting from the enforcement of the *Communiqués* or other laws. No such support is included or otherwise provided for in the Project.
- xiii. ***The Bank has raised the issue with the Government of Togo, which has confirmed that it will suspend the implementation of the Communiqués until an adequate regulatory framework for coastal management has been put in place.*** Such framework would establish appropriate procedures and principles, in line with good global practice. The Bank will support the Government through technical assistance to finalize the respective regulation to implement the 2021 law on managing the maritime public domain. This will help shape the national legal framework for managing the coastal zone in Togo in line with good global practice, taking into account relevant principles of Bank policies for addressing the social impacts of implementation.
- xiv. ***In Management's view, the Bank has followed the policies and procedures applicable to the matters raised by the Request. As a result, Management believes that the Requesters' rights or interests have not been, nor will they be, directly and adversely affected by a failure of the Bank to implement its policies and procedures.***



## I. INTRODUCTION

1. On September 7, 2021, the Inspection Panel registered a Request for Inspection, IPN Request RQ 21/03 (hereafter referred to as “the Request”), concerning the Togo, Western Africa: West Africa Coastal Areas Resilience Investment Project (P162337); Additional Financing – West Africa Coastal Areas Resilience Investment Project (P176313); and Global Environment Facility (P092289), financed by the International Development Association (the Bank) and the Global Environment Facility (GEF).

2. *Structure of the Text.* The document contains the following sections: Section II presents the Request; Section III provides background on the Projects and Section IV contains Management’s response. Annex 1 presents the Requesters’ claims, together with Management’s detailed responses, in table format. Annex 2 contains relevant news articles.

## II. THE REQUEST

3. The Request for Inspection was submitted by two community members living in the villages of Kpogan and Kpeme on the coast of Togo, who claim to represent fishermen of their communities. On August 27, 2021, a third community member living in the village of Agbodrafo, Togo, signed the Request. Additional signatures from 27 project-affected persons living in nine villages (Adjissenou, Agbavi, Agbodrafo, Alimagna, Djeke, Follygah, Gbodjomé, Kpeme, and Kpogan)<sup>1</sup> and from a community-based organization authorized by the Requesters to represent them, were also sent to the Panel on the same date. There are hereafter referred to as the “Requesters.” The Requesters have asked that their identities be kept confidential.

4. Attached to the Request were copies of the correspondence, in French, between the community members and the Bank from March and June 2021 raising concerns related to beach access and involuntary resettlement. No other materials were received by Management related to the Request. No grievances related to this Request have been received by the Project grievance mechanism in Togo, nor by the Bank’s Grievance Redress Service.

## III. PROJECT BACKGROUND

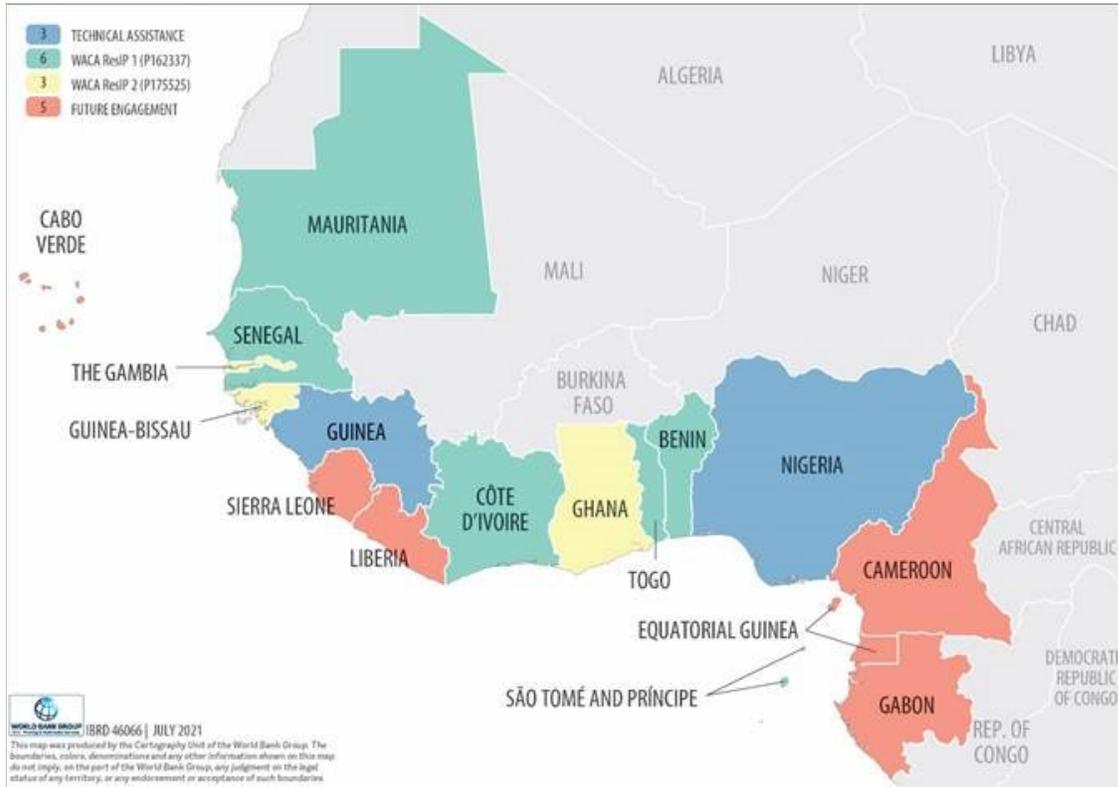
5. The Request concerns the West Africa Coastal Areas Resilience Investment Project (WACA ResIP, P162337) in Togo, which has fully blended finance from the Global Environment Facility (P163945), approved in April 2018, and Additional Financing (P176313), approved in June 2021.

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<sup>1</sup> There are alternative spellings for *Adjissenou* (“Adissem”) and *Alimagna* (“Nimanga”) used in this report.

## The Context

6. *The West African coastline, stretching from Mauritania to Gabon, includes 17 countries*, among them the Republic of Togo. Eight of these countries have a per capita gross domestic product (GDP) below US\$1,000. West Africa's coastal areas host about one third of the region's population and generate 56 percent of its GDP. Rapid urbanization and net migration to the coast increase demands on the land, its resources, and ecosystem services.



Map 1. IBRD No. 46066, Countries participating in the WACA Program

7. *The coast is subject to severe erosion* due to a combination of natural phenomena and human influence, such as the construction of major infrastructure, degradation of natural buffers such as mangroves, and sand mining. Coastal erosion causes loss of housing, assets, and land. Every year, an average of 500,000 people in the region are threatened by aggravated coastal erosion, flooding and pollution. At a macro level, in 2017 the cost was estimated at 6.4 percent of the GDP annually in Togo, of which the main cause was destruction of housing and loss of livelihoods due to coastal erosion (see Picture 1).

8. *Climate change and climate variability are predicted to further aggravate existing physical, ecological, biological, and socioeconomic stresses on the coast.* Climate change is set to exacerbate coastal degradation, with sea level rise of 0.3-0.6 meters by 2050, and 1 meter by 2100. Extreme rainfall, extended droughts and other climate events are likely to become more frequent in the region. The increased frequency and intensity of tidal waves and storm surges exacerbate coastal erosion.



*Picture 1. Coastal erosion in Togo; the structure on the far left used to be a water well*



*Picture 2. Remnants of the eroded Lomé-Aného road*

9. ***Sandy beaches in coastal West Africa are maintained by a strong wave-driven longshore transport of silt, sand, and gravel.*** Sediments originate from rivers and large coastal sand deposits. Over the last decades the natural supply of sediment to the coast in West Africa has been obstructed or removed due to coastal and river infrastructure and sand mining. Management of the coastline and its sediments is complex and requires regionally coordinated and integrated efforts of regional and national institutions. It also requires engineering and social solutions, some of which are available, others which call for innovation.

10. ***For the reasons above, the World Bank committed at COP21 to support Togo and other coastal countries in coastal zone management.*** The Bank is using its convening power, instruments, finance, and partnerships as part of the 10-year West Africa Coastal Areas Program (WACA)<sup>2</sup> to assist countries in managing coastal erosion, flooding, and pollution.



Picture 3. Example of a groyne that prevents coastal erosion (not in Togo)

11. ***Other development partners recognize the strategic importance of WACA, and are supporting or engaged in WACA along with the World Bank.*** The French development agency (AFD) and French national technical institutions; the Nordic Development Fund; the Netherlands Enterprise Agency; the Spanish Agency for International Development Cooperation; Japan; and the Korea-World Bank Partnership Facility are among those engaged in WACA. The collaboration on and parallel co-financing of the WACA ResIP are part of an effort to provide West African countries access to solutions and finance at the scale needed to combat coastal erosion, flooding, and pollution.

12. ***President Macron of France, President Sall of Senegal, and President Kim of the World Bank convened on the coast of Saint-Louis, Senegal in February 2018 to confirm this commitment, as a follow-up to the 2018 World Planet Summit in Paris.*** This approach

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<sup>2</sup> See [www.wacaprogram.org](http://www.wacaprogram.org) for the WACA Annual Report, Call for Innovation, State of the Coast, Center of Excellence, and Partnerships.

is consistent with the Bank's effort to become transformational with its programs, whereby IDA works to prevent donor overlaps, and capitalize on existing solutions to address development challenges of the poor and vulnerable in Africa.

### **The Parent Project (P162337)**

13. The WACA Resilience Investment Project (ResIP, P162337), which was approved by the Board on April 9, 2018, is a **multi-country regional project** that supports the strengthening of resilience of coastal communities and assets in **six countries**—Benin, Côte d'Ivoire, Mauritania, São Tomé and Príncipe, Senegal, and Togo. These six countries, covering approximately 2,186 km of coastline, have particularly vulnerable coastal areas (erosion, flooding, pollution) and have a degree of readiness through national multi-sectoral investment planning processes. The Project Development Objective is to strengthen the resilience of targeted communities and areas in coastal Western Africa.

### **Project Components**

14. **Component 1: Strengthening Regional Integration (US\$12.0 million IDA).** The West Africa Economic and Monetary Union (WAEMU) plays a strategic role in the implementation of the regional component. WAEMU focuses on identifying innovative financing instruments and helping countries adopt them, developing directives for the harmonization of regulations for integrated coastal zone management in western Africa and implementing a sound communication and awareness-raising plan. WAEMU established a Regional Integration Management Unit (RMU) to manage this Component.

15. **Component 2: Strengthening the Policy and Institutional Framework (US\$40.8 million) of which US\$7.1 million in Togo (US\$5.0 million IDA and US\$2.1 million GEF).** This component helps countries develop the adequate policy framework and the necessary tools for the development and/or operationalization of their coastal management strategies and plans, both at the national and regional levels. More specifically, it provides support to develop and operationalize coastal management strategies and action plans at the central and local levels and promote effective management of transboundary coastal ecosystems and spatial planning. Support is also provided toward designation of areas with high ecosystem value. The GEF funds complement the IDA-financed activities by strengthening local regulations, policies, and institutions to address major perceived problems and issues in the coastal ecosystems along Western Africa's coastal zone.

16. **Component 3: Strengthening National Physical and Social Investments (US\$192.4 million) of which US\$52.4 million in Togo (US\$47.4 million IDA and US\$5.0 million GEF).** This component finances coastal investments, or sub-projects, to protect vulnerable areas from coastal erosion and flooding, to support pollution control and waste management operations, and to promote climate-resilient coastal development. Investments include support for restoring or preserving healthy and functioning ecosystems and protecting coastal economic assets, emergency measures to prevent further degradation of hotspots, and long-term planning and management of the coast, based on sector priorities, scenarios for sustainability, pre-feasibility studies, cost-benefit analysis, environmental and social impacts, and public consultations.

17. **Component 4: National Coordination (US\$18.5 million) of which US\$5.0 million in Togo (US\$4.6 million IDA and US\$0.4 million GEF).** At the national level, a Project Implementation Unit (PIU) in each beneficiary country manages the Project. Technical Committees (TCs) have also been established to ensure smooth technical coordination. GEF funds finance the additional support required for the GEF-specific interventions, including the M&E system for the GEF, reporting requirements, and sharing of results and knowledge gained through the Project by participation in International Waters learning activities.

18. **Togo Project Status.** In terms of major activities, the status of Project implementation can be summarized as follows. Following preparation of the feasibility study, the contract for *coastal protection works from Agbodrafo to Aného* (see Map 2) is under Bank review and the Supervision Engineer has been recruited. The work will start only after the Environmental and Social Impact Assessment (ESIA) and Resettlement Action Plan (RAP) have been completed and published, and the RAP implemented. The emergency works to prevent erosion at six sites are 82 percent completed. The first part of the pre-feasibility study for the dredging and stabilization of the banks of Lake Togo and associated lagoons has been prepared, while the detailed feasibility study is in preparation. Two flood control sub-projects have been implemented with communities, eleven social sub-projects are underway, and agreements for seven income-generating activities have been signed. In addition, Togo has participated in regional integration activities, including the cross-border technical and ministerial committee with Benin, and contributed to the West Africa 2020 State of the Coast Report. As of August 31, 2021, the Project disbursement rate was 13.1 percent. The closing date of the Project is December 31, 2023.

### ***Environmental and Social***

19. The impacts of the Project on the target coastal areas and populations are expected to be positive in terms of addressing the risks of coastal erosion for local communities and risks to livelihoods for many households as well as improving conservation of biodiversity and physical cultural heritage. Nevertheless, it was also anticipated that Project activities might result in some limited negative environmental impacts and five Operational Policies (OPs) on safeguards were determined to be applicable: OP 4.01, Environmental Assessment; OP 4.04, Natural Habitats; OP 4.36, Forests; OP 4.11, Physical Cultural Resources; and OP 4.12, Involuntary Resettlement. Since the very detailed scale and specific location of interventions in each country were not defined at approval, the Project used a framework approach to provide guidance on how to manage these risks and impacts. **Each country** prepared an Environmental and Social Management Framework (ESMF) and a Resettlement Policy Framework (RPF) to guide the preparation of site-specific ESIA and RAPs. **In Togo**, the ESMF was consulted upon and was disclosed on November 15, 2017, updated, and redisclosed on April 16, 2021. The RPF for Togo was disclosed on November 30, 2017. Additional ESIA, including Environmental and Social Management Plans, will be prepared for some site specific investments. Similarly, RAPs will be prepared as necessary during Project implementation; the RAP for the *coastal protection works from Agbodrafo to Aného* is currently under preparation.

## IDA Additional Financing (P176313)

20. An Additional IDA Financing of US\$36 million (of which US\$12 million is for Togo,) was approved by the Board on June 18, 2021 for the cost overrun associated with physical investments in the Togo-Benin transboundary area under Component 3. The cost overrun became apparent once the cost for the preferred 15-year sustainability option—a combination of construction of groynes and beach nourishment—became known. The only change that the Additional Financing brings to the WACA ResIP is the increase in financing amount. Other than that, there is no change in the closing date, implementation arrangements, environmental and social safeguards policies, risks, and results framework.

21. In summary, the total amount of financing available for Togo is US\$64.5 million (US\$57 million from IDA and US\$7.5 million from GEF).

## Legal Background in Togo

22. ***Under Component 2, the Project is providing financing for technical assistance to help the Government improve its legislative and regulatory framework for coastal management.*** The Project Appraisal Document indicates that technical assistance would include support for finalization of new legislation governing coastal area management. Although the Bank had previously supported a desk review of the existing legislative and institutional framework for coastal management through a Bank-Executed Trust Fund, the Project did not provide support for the drafting of new legislation, which eventually took the form of Law No. 2021-011 *Relative à l'Aménagement, à la Protection et à la Mise en Valeur du Littoral*, prepared by the Government and adopted in May 2021. Instead, the Project has recently begun supporting the preparation of implementation decrees and *arrêtés* (orders) for the 2021 law. Several draft decrees are in the process of being elaborated.<sup>3</sup>

23. ***Unrelated to the WACA ResIP, the Government of Togo has announced that people settled in the country's maritime public domain should move away from the area.*** The Government has issued two “*Communiqués Interministeriels*” asking those that are illegally occupying the maritime public domain<sup>4</sup> to vacate the area. A first *Communiqué* was issued on August 31, 2020, requesting settlers to vacate what was referred to as “illegally occupied areas” in the maritime public domain within six months. A second *Communiqué* was issued on January 28, 2021, as a reminder to vacate the area by March 3, 2021. ***The Communiqués themselves predate the 2021 law and are based on preexisting Togolese law.*** To the Bank's knowledge, no evictions have yet taken place as a result of said *Communiqués*.

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<sup>3</sup> *Décret Portant modalités de recherche dans la zone du littoral; Décret Portant attributions, composition, organisation et fonctionnement du comité national de gestion du littoral; Décret Définissant les modalités d'application des directives d'aménagement du littoral; Arrêté Fixant les conditions de collecte, de traitement et d'évacuation des déchets solides et liquides dans la zone du littoral; Arrêté Définissant les conditions et modalités d'exploitation du sable ou du gravier continental dans la zone du littoral.*

<sup>4</sup> **Maritime public domain** includes territorial sea, its soil and subsoil extending 12 nautical miles from low tide, the shoreline, lagoons, rivers, salt ponds, bays and navigable rivers communicating with the sea, as well as **100 meters from the farthest point at high tide** (*Loi N 2016-028 11 du 10/16 Portant Code de la Marine Marchande*).

24. ***The issuance of these Communiqués has contributed to some confusion between the limited, site-specific impacts expected from the WACA ResIP and a broader government initiative.*** As described in the Inspection Panel’s Notice of Registration and in Management’s response below, the Requesters refer to the Government’s intent to vacate settlements in the maritime public domain, as expressed in the *Communiqués*, in the context of WACA ResIP implementation. Management notes that the *Communiqués* have not been issued in connection with the Project nor are they required to achieve the Project’s development objective. In addition, Project technical assistance did not contribute to the drafting of these Communiqués.

25. ***During meetings and in correspondence with the Government, the Bank has reminded the Government that any land acquisition, involuntary resettlement or economic displacement required for the implementation of Project activities must be governed by the RPF and applicable Bank policy.*** Moreover, the Bank has reiterated to the Government that the WACA ResIP does not support any resettlement resulting from the enforcement of the *Communiqués* or other laws. No such components are included or otherwise provided for in the Project. The civil works supported by the Project are not expected to require a significant amount of permanent physical or economic displacement. The Government has confirmed that it shares this understanding.

26. ***Further, the Government of Togo has confirmed to the Bank that it will suspend the implementation of the Communiqués until an adequate regulatory framework for coastal management has been put in place.*** Such framework would establish, *inter alia*, appropriate procedures and principles for addressing the social impacts of implementation, in line with good global practice. This would also be required to enable the technical assistance offered by the Project to provide meaningful input into the development of the legal framework for coastal management, based on good global practice.

27. ***The Bank will support the Government through technical assistance to finalize four décrets and two arrêtés implementing the 2021 law.*** The intent is to help shape the national legal framework for managing the coastal zone in Togo in line with good global practice, reflecting Bank policy provisions, and in coordination with other donors and civil society.

#### IV. MANAGEMENT'S RESPONSE

28. The Requesters' claims, accompanied by Management's detailed responses, are provided in Annex 1.

29. ***Management has carefully reviewed the Request for Inspection and concluded that the Requesters' concerns mainly relate to the Government's intention to move all residents from a 100-m zone at the sea front known as the maritime public domain.*** This, however, is not connected in any way to the WACA ResIP nor required for the civil works financed by it. The civil works that are financed by the Project are relatively small in scale and situated on the sandy beach and protruding into the sea. It is anticipated that they will require only a small amount of physical resettlement and economic displacement, some of which will be temporary during construction and some of which will be permanent and related to the safety zone around the structures.

30. ***Management notes that some of the villages cited in the Request are not located in the Project area and hence will not be affected by Project-related works (see Map 2).*** This may be caused by a confusion between the WACA ResIP and other development projects, that also address erosion on the Togo coast and are financed directly by the African Development Bank (AfDB). These projects are separate interventions that are neither required for the WACA ResIP to meet its objectives, nor supported by the Project, or covered by the Bank's safeguard instruments.

31. ***The Project will not have permanent adverse effects on artisanal fishers and their livelihoods.*** Rather, the opposite is the intent: the Project is helping to prevent coastal erosion, and by doing so contributing to securing access to the sea by artisanal fishers. The Project supports two types of coastal investments, neither of which will limit access to the shore or fisheries: (i) small-scale emergency coastal protection that consists of vertically sunk-in concrete pipes; and (ii) coastal protection works to rehabilitate and expand a breakwater and existing groynes and construct new groynes of 60-75 m length perpendicular to the shore. The worksites themselves will not be accessible to the public during construction for safety reasons, but the open space between the groynes will be about 350-400 meters, which allows for public access to the sea. The works will block the sea front only in very limited places and will not restrict use of the beach for storing boats or fishing. For the emergency works, which are largely completed, a social audit will be conducted to assess any unintended impacts from temporary access restrictions that may have resulted from the construction works. The audit will also help to draw lessons from implementation of the emergency works.

32. ***Finally, regarding the allegations of lack of information and unsatisfactory consultations, Management notes that the consultation and information processes have only just begun.*** There also seems to be confusion between the Project's *framework* documents and its *site-specific plans*. Consultations were held during preparation on the Project's ESMF/RPF with a broad range of stakeholders, which included but were not restricted to potential Project-affected people. The site-specific ESIA and RAPs, on the

other hand, are currently under preparation.<sup>5</sup> Consultations with affected communities on these draft documents are underway. Management recognizes, however, that information provided by Government agencies to the affected communities at times can make it difficult to separate the activities supported by the Project and the unrelated implementation of government policies or enforcement of national law. Additionally, the Bank has learned that the national Expropriations Committee (Comex)<sup>6</sup> had consultations with communities in the Project area based on an initial draft of the RAP. As this draft RAP was neither reviewed nor given a no-objection by the Bank, the Bank has asked Comex to stop all engagements and consultations until the Bank-cleared RAP is ready to be consulted upon. These premature consultations have contributed to the communities' confusion. The Bank will work with the PIU to enhance communication and outreach to address this situation.

33. *A Bank team visited the Project area in Togo during September 20–22, 2021.* The mission team inspected the six sites for emergency protection (*Gbodjomé*, two sites in *Dévikinme*, *Tango*, *Nimanga*, and *Adissem*), the seven sites for construction of new groynes, and the six sites for rehabilitation of existing groynes. The Bank team met with about 62 community members in the concerned villages, as well as the PIU and the contractor building the emergency works.



Picture 4. Mission team meets with Dévikinme community representatives (September 21, 2021)

<sup>5</sup> The Project is expected to have two RAPs. One is for the coastal protection work from Agbodrafo to Aného that is currently under preparation. A second RAP will be prepared for Project areas that are not located on the coast and unrelated to the Request.

<sup>6</sup> Comex, or *Commission d'Expropriation*, is an interministerial committee established by Decree No 2019-189/PR, whose mandate is to implement land acquisition related to development projects for the Government of Togo.

34. The specific allegations are discussed in more detail below.

**A. Alleged Impacts related to Occupation of the Maritime Public Domain**

35. ***The reported loss of beach access between 2009 and today, as cited in the Request, is due to coastal erosion that pre-dates the Project, which was approved in 2018.*** Coastal erosion is a natural and human-induced phenomenon that has gradually worsened due to construction on the coast over the last sixty years: dams have reduced the natural flow of sediments to the beach; ports have obstructed longshore sediment flow; and sand has been mined from riverbanks and beaches for construction. Togo loses an average of 2.5 m of beach per year along its 56-km coastline, taking into account areas that erode up to 10 m per year. If no action is taken, climate change is likely to exacerbate the situation. The WACA ResIP is designed to make communities less exposed to coastal erosion.

36. ***The Project's Legal Agreement requires that any land acquisition, physical resettlement or economic displacement be commensurate with the needs of the Project only. The civil works supported by the Project are not expected to require a significant amount of permanent physical or economic displacement.*** Any such impacts caused by the Project will be assessed and managed in line with Bank policy and per the RPF approved for the Project.

37. The site-specific RAP that is under preparation for the coastal protection works for the section from Agbodrafo to Aného will cover impacts directly related to the construction of the groynes, including temporary impacts during construction as well impacts related to establishing a permanent safety zone around the groynes.

38. ***The Government of Togo issued two Communiqués Interministeriels unrelated to the WACA ResIP, which are noted in the Request.*** The first is dated August 31, 2020 and requested people illegally occupying the coastal area under maritime public domain to leave within six months. The second is dated January 28, 2021 and was a reminder of the request to vacate the area, for which it set a deadline of March 3, 2021. The maritime public domain is defined under Togolese law (*Loi No 2016-028 du 11/10/2016 Portant Code de la Marine Marchande*, Article 16) as including the area up to 100 m from the high-water mark.

39. ***The Communiqués issued by the Government to vacate settlements in the maritime public domain are not connected to the WACA ResIP.*** The Government's request that residents vacate the 100-meter maritime coastal domain is not required by the Project and not necessary for the implementation of the civil works, nor has the Government asked the Bank to support the resettlement of population out of the maritime public domain. The WACA ResIP will not support any potential resettlement resulting from the Government's enforcement of the *Communiqués* or other laws. No such components are included or otherwise provided for in the Project. The Bank has raised these issues with the Government which has re-confirmed that it shares the Bank's understanding, as set out above.

40. ***Both Communiqués, based on pre-existing Togolese law, state the Government's intent to enforce national law requirements relating to illegal occupation of the maritime***

**public domain.** The pre-existing legislative definition of maritime public domain and the enforcement of related laws prohibiting its occupation (as reflected in the August 2020 and January 2021 *Communiqués*) are unrelated to the WACA ResIP (see paragraphs 23-26 above).

## **B. Alleged Impacts on Fisheries and Livelihoods**

41. ***The Project will not have permanent adverse impacts on artisanal fishing activities.*** Project-financed civil works (groynes, breakwaters, beach replenishment) are not intended to limit access to the shore or fisheries. Rather, the Project will result in an increased beach width of around 30 m (instead of the currently expected loss from erosion of 40 m over the next 15 years). The Project aims to strengthen the resilience of targeted communities and areas in coastal Western Africa. It is financing coastal protection to prevent erosion in Togo. This will help to secure the beach, provide greater access to fishing activities, and protect an estimated 4,600 households from the impacts of coastal erosion. ***Any potential temporary access restrictions resulting from the construction works will be assessed and compensated, as may be warranted.***



*Picture 5. Groynes at Kpeme on the Togolese coast to be rehabilitated by the Project (2021)*

42. ***The Project is designed to prevent coastal erosion through shore protection structures.*** There are two types of structures supported by the Project to secure long-term access to the shore and fisheries: (i) small-scale emergency coastal protection that consists of vertically sunk-in concrete pipes; and (ii) coastal protection works to rehabilitate and expand breakwaters and existing groynes, fill abandoned lagoon arms with sand and revegetation, and construct new groynes. Both types of infrastructure have a relatively small footprint and were selected on the basis of the results of feasibility studies. As noted above in paragraph 31, the works will not block access to the sea front.

43. ***The small-scale emergency coastal protection measures (in the original of the Request referred to as “faux puits de Gbodjomé”, or “false wells of Gbodjomé”) are measures that have been undertaken in six noncontiguous hotspots totaling 1.2 km, which***

are 82 percent completed. They consist of precast concrete pipes (approximately 150 cm in diameter and 1 to 2 m 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 erosion, until longer-term protective measures, such as groynes and beach nourishment, can be put in place. They are not a long-term solution because they can be damaged or displaced by heavy wave action over time; nevertheless, because they do not take long to install, they represent a rapid option to provide immediate protection to houses and livelihoods where benefits outweigh risks.

44. ***The local beneficiary communities participated in the site selection for the small-scale emergency coastal protection.*** Consultations were held on March 10, 2020 and included local communities, the national agency for environmental management (*Agence nationale de gestion de l'environnement*, ANGE) and representatives of the PIU. As a result, six sites were selected. An environmental and social screening was conducted to identify necessary environmental and social measures to be taken prior to installing the pipes. These measures were incorporated as environmental health and safety clauses into the works contracts. Some of the mitigation measures included the need for the contractor to maintain a regular dialogue with the fishermen to avoid/minimize any interference with fishing activities, identify temporary alternate fishing boat landing locations, establish a health and safety committee where needed, and secure the site during the works. On some work sites construction material was not properly stored; corrective measures have been agreed with the PIU and the contractor was instructed accordingly.

45. ***The construction of the small-scale emergency coastal protection measures is advanced and following the Bank mission to the sites in September 2021, their status is as follows.*** The measures have been completed in *Tango and Gbodjomé*, and will be completed shortly in *Nimagna*. However, in *Adissem*, rough seas during seasonal storm surges delayed the works. Pipes have been stored on the beach until the work can start. Local fishermen have requested that the original design be modified to include two 50-meter corridors that will allow them to pull up their boats (pirogues) for yearly maintenance, which the contractor is now putting in place. Regarding the two sites in *Dévikinme*, the works were completed but the tides and strong storm wave action damaged and engulfed some of the installed pipes. The contractor is in the process of repositioning the pipes and cleaning up the site by removing all broken and engulfed pipes.

46. In meetings with the community during the September 20-22, 2021 mission, the Bank team inquired about possible impacts from the emergency works. Community members emphasized the need to work quickly to address the progressing erosion and make the boat landing points available and free from any construction material. Wave action has eroded the beach in many areas, exposing sharp rocks that the fishermen need to avoid so as not to damage their boats. A social audit at completion stage will establish any unintended impacts from temporary access restrictions resulting from the emergency works, which will be compensated, as may be warranted.



Picture 6. Emergency coastal works to protect livelihood assets (a small resort) is almost completed. Surplus construction material will be removed (September 21, 2021)

### C. Alleged Lack of Information and Consultation

47. *The site-specific ESIA and RAP are currently under preparation and formal consultations with the affected communities on these instruments have only recently begun.* The Request appears to refer to the preparation process for the Project’s framework documents (ESMF/RPF), for which consultations were held with a broad range of stakeholders, including but not limited to people potentially affected by the Project.

#### **RPF**

48. *Consultations for the RPF were conducted in several locations in the broad Project area and in Lomé in October 2017.<sup>7</sup> These consultations were not site-specific or focused on a particular activity because neither Project sites nor Project activities had been finalized at that point.* The consultations included representatives of the various ministries, local authorities, village chiefs and community members, including representatives from several women’s organizations. The final version of the RPF contains lists of the participants in these consultations, photos of the proceedings, summaries of the information discussed, and questions raised during the sessions.

49. The approved RPF contains details regarding the potential categories of Project-affected people and possible losses and impacts, including livelihoods, land, housing, and commercial structures, among others. It also contains details regarding the process to be used

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<sup>7</sup> On October 16, 2017 in Tchekpo Deve, with 43 participants (including female participation through the associations ‘N’Godeha, Galagbleme, Novilolo, and Assinisse, and on October 26, 2017 in Aného, with 25 participants. Consultations were also conducted in the localities of Katanga, Gbétsogbé, Agbodrafo, Aného, Agomè-Séva, Adamè, and Agbétiko.

in each WACA country to prepare the site-specific RAPs. The approved RPF and ESMF were publicly disclosed in-country and at the Bank's InfoShop in 2017.<sup>8</sup>

### ***Site-specific ESIA and RAPs***

50. ***The site-specific ESIA for the Agbodrafo – Aného coastal protection works, where new groynes will be built and existing groynes will be rehabilitated, is currently under preparation. It will focus on the discrete Project area and involve direct consultation with Project-affected people and communities.*** The RAP preparation process outlined in the RPF includes several levels of consultation in order to ensure that the assessment of the impacts and methodology to determine eligibility and valuation of assets is as comprehensive and complete as possible. The RAP preparation process includes accessible and inclusive discussions with affected stakeholders in order to present the Project and discuss its impacts, provide an opportunity for stakeholders and Project-affected people to express questions, concerns and recommendations and hear responses from the PIU and local authorities. These sessions provide Project-affected people with a clear explanation regarding resettlement principles and suggestions about best uses of compensation received. In terms of public dissemination of information, in accordance with OP 4.12, the final version of the RAP will be made available to Project-affected people for their review. The WACA ResIP will also disseminate more general project information to the public through the media, newspapers and radio broadcasts in national languages. The dissemination of information must be accessible for all relevant stakeholders: administrative authorities, local traditional leadership and grassroots communities (association/NGOs, women's and youth groups, socio-professional associations, religious authorities, etc.).

51. ***The preparation of the RAP for the coastal works from Agbodrafo to Aného is currently underway.*** While some discussions with local communities and Project-affected people have been held as part of the RAP preparation process, these have been preliminary and are not final determinations of eligibility. These initial consultations were carried out by the Borrower on the basis of an incomplete draft RAP that was neither reviewed nor cleared by the Bank. These consultations have been stopped at the Banks' request until the Bank-cleared RAP is ready to be consulted upon. This final version of the RAP will be reviewed by the Bank and will require a no-objection before it is considered ready for implementation. Moreover, a RAP completion report confirming the satisfactory implementation of the RAP will be required prior to the start of civil works. The Project-level grievance redress mechanism (GRM) is already operational and will continue to be available to all stakeholders during RAP preparation and implementation, as well as during the life of the Project.

52. ***The RAP census and surveys of the potentially affected persons have started but have not been completed.*** Once the surveys and the draft RAP are finalized, they will be

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<sup>8</sup> ESMF Approved and disclosed on November 18, 2017 <https://documents1.worldbank.org/curated/en/926031511191770807/pdf/WACA-ESMF-Executive-Summaries-15-Nov-2017-11152017.pdf>  
ESMF updated in 2021 to incorporate provisions for OP 4.09 and redisclosed in April 2021 [https://environnement.gouv.tg/wp-content/uploads/2021/06/Rapport-CGES-WACA-TOGO\\_actualise-avril-2021-ver\\_ok.pdf](https://environnement.gouv.tg/wp-content/uploads/2021/06/Rapport-CGES-WACA-TOGO_actualise-avril-2021-ver_ok.pdf)

RPF Approved and disclosed on the Bank's website on Dec 1, 2017 <https://image-bank2.worldbank.org/Search/28957464>

further discussed and consulted upon with Project-affected people as part of the RAP consultation process. Agreement on the compensation package must be obtained from any person or household affected by the implementation of the civil works prior to the start of works. Their satisfaction with the compensation measures will be confirmed as part of the RAP completion report.

#### D. Project Alternatives

53. ***The Project considered relevant alternatives – including beach replenishment only, groynes only and combination of groynes and beach replenishment – and selected an option that combines different approaches to achieve the Project’s development objective.*** The Project will finance about 600,000 m<sup>3</sup> of beach sand replenishment to fill the spaces between the groynes. The sand will be obtained from deep-sea dredging. The selection of the combined option for coastal protection (groynes and beach replenishment) was studied in detail during Project preparation. This considered costs, the level of protection, lifetime, and potential positive and negative environmental, social and economic impacts.

54. ***It is important to note that the beach-replenishment-only option, as suggested in the Request, is not viable based on scientific and technical studies.*** Without the additional groynes on the shoreline to slow or block the sediment flow, the replenished sand would quickly vanish again. Hence, the no-groyne option would not protect coastal communities from continued erosion and last just about three years, at which point the costly sand supply would need to be repeated.

Picture 7. Gain in sand area resulting from groyne construction



*Groynes built in 1987*

*Expected position of shoreline today without groyne construction and beach replenishment in 1987*

## E. Confusion with Project Activities Financed by Other Development Agencies

55. **Management notes that some of the villages mentioned by the Requesters (Avepozo and Kpogan) are actually not in the WACA ResIP area.** Their concerns possibly pertain to project interventions that are being financed through other agencies, but not the Bank.

56. **Other projects addressing erosion on the Togo coast, which are financed by the AfDB, are similar to the WACA ResIP.** The AfDB project, Lomé-Cotonou Road Rehabilitation and Coastal Protection Project, is also funding the ongoing preparation of Togo's Coastal Master Plan (*Schéma Directeur d'Aménagement du Littoral*), which is referred to in the Government Communiqués.

57. As stated above, Management recognizes the need for the Government to provide information to communities in an accessible and timely fashion about the different government interventions, some of which are supported by development partners. The Bank will work with the PIU to enhance communication and outreach to address this situation.

## Actions

58. In Management's view the Project has followed Bank policy requirements to date. The Bank is committed to supporting the Government in fully implementing this project for the benefit of coastal communities in West Africa. Recognizing the need to maintain a strong engagement with Project-affected people, additional emphasis will be put on:

- **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.
- **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.
- **Piloting the Local Action and Citizen Engagement (LACE) Initiative in Togo.** LACE aims to support information sharing, capacity building and dialogue with 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 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**.

- ***Supporting the Government to implement a better targeted and more proactive information campaign*** 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 *2020 State of the Coast Report*, and the *2021 WACA Compendium of Solutions*; and (ii) information regarding engagement processes as part of the RAP consultations, and the grievance redress mechanism.

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**.

59. ***In Management's view, the Bank has followed the policies and procedures applicable to the matters raised by the Request. As a result, Management believes that the Requesters' rights or interests have not been, nor will they be, directly and adversely affected by a failure of the Bank to implement its policies and procedures.***

**Annex 1  
Claims and Responses**

No.	Claim	Response
1.	<p><i>[T]he WACA project financed by the Bank IDA (World Bank Group) will have <u>negative repercussions</u> on our fishing activities and land disputes on the coastal areas.</i></p>	<p><b><i>The Project will not have permanent adverse effects on artisanal fishers and their livelihoods. Project-financed civil works (groynes, breakwaters, beach replenishment) are not intended to limit access to the shore or fisheries. Rather, the Project will result in an increased beach width of around 30 m (instead of an expected loss from erosion of 40 m over the next 15 years). Any temporary access restriction will be assessed and compensated, as may be warranted (see paragraph 41).</i></b></p> <p>The Project aims to strengthen the resilience of targeted communities and areas in coastal Western Africa. The Project is financing coastal protection to <b>prevent</b> erosion in Togo. This will help to secure the beach, provide greater access to fishing activities and protect an estimated 4,600 households from the impacts of coastal erosion.</p> <p>WACA ResIP activities are not expected to cause or affect land disputes in coastal areas. Any land acquisition, involuntary resettlement or economic displacement required for the implementation of Project activities is governed by the RPF and site-specific RAPs prepared according to Bank policy.</p>
2.	<p><i>In 2009 the residents had about 400 meters and at the time of writing this note <u>we only have 20 meters</u> and the State asked residents to leave 150 meters of shore while the real sea encroachment has affected a lot of houses, fields of coconut palms. This upsets the community who also thinks that the activities of artisanal fishing will be prevented and shows as an example the wells of Gbodjomé.</i></p>	<p><b><i>WACA does not support eviction of any residents and the Legal Agreement requires that any land acquisition, physical resettlement or economic displacement be commensurate with the needs of the Project only. The civil works supported by the Project are relatively small in scale and situated on the sandy beach and protruding into the sea. It is anticipated that they will require only a small amount of physical resettlement and economic displacement, some of which will be temporary during construction and some of which will be permanent and related to the safety zone around the structures. Any impacts will be identified and managed per the principles and standards set out in the approved RPF and the RAPs that are under preparation.<sup>1</sup></i></b></p> <p>The reported loss of beach access between 2009 and today is due to coastal erosion that pre-dates the Project, which was approved by the Board in 2018. Coastal erosion is a natural and human-induced phenomenon that has gradually worsened due to building of infrastructure on the coast over the last sixty years. Dams have reduced the natural flow of sediments to the beach; ports have obstructed longshore sediment flow; and sand has been mined from riverbanks and beaches for construction. Togo loses an average of 2.5 m of beach per year along its 56-km coastline, taking into account areas with accretion and others that erode up to 10 m per year. If no action is taken, climate change is likely to exacerbate the situation.</p>

<sup>1</sup> The RAP for the coastal protection works from Agbodrafo to Aného is under preparation. Another RAP for a different part of the Project (not the subject of this Inspection Panel Request) will be prepared at a later stage.

No.	Claim	Response
		<p>The WACA ResIP is designed to make communities less exposed to coastal erosion.</p> <p>With respect to the claim about eviction, the Government of Togo has issued two <i>Communiqués</i>, unrelated to the WACA ResIP:</p> <ul style="list-style-type: none"> <li>• The August 31, 2020 <i>Communiqué Interministériel</i> requested people illegally occupying the coastal area under maritime public domain to leave within six months;</li> <li>• The January 28, 2021 <i>Communiqué Interministériel</i> was a reminder of the request to vacate the area and established a deadline of March 3, 2021.</li> </ul> <p>The maritime public domain is defined under Togolese law (Loi No 2016-028 du 11/10/2016 <i>Portant Code de la Marine Marchande</i>, Article 16). According to Article 16 of this law, the maritime public domain includes the area up to 100 m from the high-water mark.</p> <p>Both <i>Communiqués</i> state the Government's intent to enforce national law requirements relating to illegal occupation of the maritime public domain.</p> <p>Neither the legislative definition of maritime public domain nor the enforcement of laws prohibiting occupation in the zone are mandated by, or related to, the WACA ResIP.</p> <p><b><i>The Government of Togo has confirmed to the Bank that it will suspend the implementation of the Communiqués until an adequate regulatory framework for coastal management has been put in place.</i></b> Such framework would establish, <i>inter alia</i>, appropriate procedures and principles for addressing the social impacts of implementation, in line with good global practice. This would also be required to enable the technical assistance offered by the Project to provide meaningful input into the development of the legal framework for coastal management, based on good global practice.</p>
3.	<p><i>Despite all the discussions with the local Bank office, we have the impression that the situation was complicated by the latest deadline the State has given to the residents to vacate their premises giving way to the WACA project. This upsets the community who also thinks that the activities of artisanal fishing will be prevented and shows as an example the wells of Gbodjomé.</i></p>	<p><b><i>The Communiqués issued by the Government to vacate settlements in the maritime public domain are not related to or required by the Project (see above).</i></b></p> <p>One individual sent two emails to the Bank office in Lomé asking for clarifications about the WACA ResIP and potential for relocation under the Project. In both instances, the Bank team responded by referring the individual to the PIU for further information on Project activities, as is standard practice. As this individual did not contact the PIU, the Bank team specifically asked the PIU on June 19, 2021 to proactively reach out to this individual and to provide information regarding the Project activities. The PIU invited this person twice (in June and July 2021) for a meeting, but no response was received.</p> <p><b><i>The Government's request that residents vacate the maritime coastal domain is not related to the WACA ResIP.</i></b> It is not required by the Project and not necessary for the implementation of the civil works, nor has the Government asked the Bank to support the resettlement of population out of the maritime public domain. The</p>

No.	Claim	Response
		<p>WACA ResIP will not support any potential resettlement resulting from the Government’s enforcement of the <i>Communiqués</i> or other laws. No such components are included or otherwise provided for in the Project.</p> <p>Any potential resettlement under the Project will be governed by the RPF and subsequent RAPs. The RAP for <i>the coastal protection works from Agbodrafo to Aného</i> (under preparation) will cover impacts directly related to the construction of the groynes, including temporary impacts during construction as well impacts resulting from establishment of a permanent safety zone around the groynes (around 5 to 10 meters on each side of the groyne). <b><i>The Bank asked the PIU to clarify publicly that the Project was unrelated to government announcements related to the Communiqués, which it did (as noted in news articles in Annex 2).</i></b></p> <p><b><i>No suspension of artisanal fishing has occurred, nor is any anticipated or required for the civil works financed by this Project.</i></b></p> <p>The “<i>faux puits de Gbodjomé</i>” or “false wells of Gbodjomé,” as they are referred to in the Request, are small-scale, emergency coastal protection measures in six noncontiguous hotspots totaling 1.2 km, which are 82 percent completed. They consist of precast concrete pipes approximately 150 cm in diameter that are installed upright on the beach (hence the resemblance to wells), anchored to bedrock, and filled with sand. They are intended to help retain beach sand behind the pipes and provide <b><i>short-term protection</i></b> to homes and assets against erosion, until longer-term protective measures, such as groynes and beach nourishment, can be put in place.</p> <p>The concrete pipes are clustered in six sites, each of which measures 1-2 m high and from 80 to 500 m wide, depending on the site. The design uses the same specifications as were used in a successful 2015 pilot that was not supported by the Bank but self-financed by the residents. The solution was deemed suitable by the Bank for the purpose of immediate protection, if properly anchored in the bedrock and combined with monitoring. They are not a long-term solution because they can be damaged or displaced by heavy wave action over time; nevertheless, because they do not take long to install, they represent a rapid option to provide immediate protection to houses and livelihoods where benefits outweigh risks.</p> <p>The local beneficiary communities participated in the site selection for these measures. Consultations were held on March 10, 2020 and included representatives of the PIU, ANGE and local communities. As a result, six sites were selected (see Map). Environmental and social <b><i>screening</i></b> was conducted by the Project’s environmental and social specialists, with the support of ANGE, to identify necessary environmental and social measures to be taken prior to installation of the pipes. These measures were incorporated as environmental health and safety clauses into the civil works contracts. Some of the mitigation measures included the need for the contractor to maintain a regular dialogue with the fishermen to avoid/minimize any</p>

No.	Claim	Response
		<p>interference with fishing activities, identify temporary alternate fishing boat landing locations where needed, establish a health and safety committee, provide workers with Personal Protective Equipment (PPE) and secure the work site during the civil works.</p> <p><b><i>The construction of the small-scale emergency coastal protection measures is advanced, and following a Bank mission to the sites in September 2021, their status is as follows.</i></b> The measures have been completed in <b><i>Tango and Gbodjomé</i></b>, and will be completed shortly in <b><i>Nimagna</i></b>. However, in <b><i>Adissem</i></b>, rough seas during seasonal storm surges delayed the works. Pipes have been stored on the beach until the work can start. Local fishermen requested that the original design be modified to include two 50-meter corridors that will allow them to pull up their boats (pirogues) for yearly maintenance, which the contractor is now putting in place. Regarding the two sites in <b><i>Dévikinme</i></b>, the works were completed but the tides and strong storm wave action damaged and engulfed some of the installed pipes. The contractor is in the process of repositioning the pipes and cleaning up the site by removing all broken and engulfed pipes.</p> <p>In meetings with the community during the September 20-22, 2021 mission, the Bank team inquired about possible impacts from the emergency works. Community members emphasized the need to work quickly to combat the erosion and make the boat landing points available and free from any construction material. Wave action has eroded the beach in many areas, exposing sharp rocks that the fishermen need to avoid so as not to damage their boats. A social audit at completion stage will establish any unintended impacts from temporary access restrictions resulting from the emergency works, which will be compensated, as may be warranted.</p> <p>The proposed <b><i>long-term sustainable solution</i></b> for the area between Gbodjomé and Agbodrafo (not in the WACA ResIP area) includes construction and rehabilitation of groynes together with beach replenishment.</p>
4.	<p>The Requesters allege that the Project, which intends to implement <u>resilience measures</u> in the coastal area, will adversely affect the fishermen, residents and property owners along the Togolese coast.</p> <p>[The Requesters] claim that as a result of the Project activities a <u>smaller area of the beach will remain</u> for the fishermen to access and use for their fishing activities, having an impact on the main source of livelihood for the fishermen and the community.</p> <p>According to the Requesters, the <u>resilience measures</u> the Project plans to implement against the decades-long coastal erosion</p>	<p><b><i>The Project will not adversely affect fishermen, residents or property (see response to Claim 1 above). Moreover, the Project will increase the area of the beach accessible to communities and fishermen.</i></b></p> <p>It is expected that the beach width <b><i>will increase</i></b> by <i>around 30 m</i> after the construction of the groynes and beach replenishment (based on technical estimates).</p> <p>Management notes that no single solution will protect the beach from eroding in perpetuity. Wave action and sea-level rise will continue to erode the beach, and unless the larger systemic issues causing coastal</p>

No.	Claim	Response
	<p>will adversely affect them. The Requesters allege that artisanal fishing and the livelihoods of fishermen and community members, who rely on fishing as a main source of livelihood, will be adversely affected by some of the Project activities. They claim that as a result of such activities, the fishermen will have <u>smaller areas of the beach to access</u>, which will impede their fishing activities, as well as reduce the landing space for their fishing boats</p>	<p>erosion are addressed, the coastal population of Togo will remain at risk over the long term.<sup>2</sup></p> <p>That said, under the Project, a wider beach will be created, and it is expected that the coast would remain stable for about 15 years. Periodic monitoring of the beach profile and bathymetry will be required to manage the coast.</p>
<p>5.</p>	<p>Additionally, they claim that the Project is disregarding the alternative of dredging and replenishing the sand beach areas, which would stabilize coastal erosion and allow fishermen and residents to remain on the beach to continue their fishing activities</p>	<p><b><i>The Project considered relevant alternatives – including dredging and beach replenishment – and selected an option that combines different approaches to achieve the Project’s development objective. The Project will finance about 600,000 m<sup>3</sup> of beach sand replenishment, using deep sea dredging, to fill the spaces between the groynes.</i></b></p> <p>The selection of the combined option for coastal protection (groynes and beach replenishment) was studied in detail during Project preparation. This took into account costs, the level of protection, lifetime, and potential positive and negative environmental, social and economic impacts.</p> <p>As part of the feasibility study, six alternatives were considered. Two were composed exclusively of beach replenishment on the Togolese side, with a massive sand supply (6,500,000 m<sup>3</sup>) to be deposited over 5,000 m of the western part of the shoreline in Togo, with the expectation that the natural dynamics of sediment drift to the east would distribute the sediment along the coastline.</p> <p>The options were further analyzed, with detailed modeling of the performance of the various options over time. Based on those results, the beach-replenishment-only option was not selected, because without the additional groynes on the shoreline to slow or block the sediment flow, the sand would vanish too quickly again. The no-groyne option would not protect coastal communities from continued erosion and last just three years, at which point the (costly) sand supply would need to be repeated.</p>
<p>6.</p>	<p>Second, the Requesters are concerned about the involuntary resettlement process allegedly attributed to the Project, and the loss of their land titles once their land is acquired by the government. They believe</p>	<p><b><i>The Project will not support any potential resettlement resulting from the Government’s enforcement of the Communiqués or other laws. No such components are included or otherwise provided for in the Project</i></b></p> <p><b><i>Any land acquisition, involuntary resettlement or economic</i></b></p>

<sup>2</sup> The appropriate long-term resilience measure is to actively manage the sediment on the coast. That is why the Bank engaged in a *Call for Innovation in 2020* to tackle the root causes of coastal sediment and lagoon management in Togo and neighboring countries. The “Trans-Sand Transnational Bypass Scheme” was one of the winning solutions. The bypass scheme would be principally funded through a public-private pooled dredging fund financed by the port operators/authorities and other involved in port and coastal operation.

No.	Claim	Response
	<p>that they will not be adequately compensated for any potential loss of dwelling or land caused by this process.</p> <p>According to the Requesters, the government issued a statement (“<i>communiqué</i>”) asking communities to vacate their houses and lands. The Requesters allege that this is related to the Project’s intent to relocate approximately 1,000 households along the Togolese coast</p>	<p><b><i>displacement required for the implementation of Project activities must be governed by the RPF and applicable Bank policy. The civil works supported by the Project are not expected to require a significant amount of permanent physical or economic displacement.</i></b></p> <p>The RPF was prepared and approved for the Project in 2017. The preparation of the site-specific RAP for <i>the coastal protection works from Agbodrafo to Aného</i> is currently underway. The preparation of the RAP is guided by the principles and standards outlined in the RPF approved for the Project and the Bank team is providing technical support to the PIU during the process. The final version of the RAP will be reviewed by the Bank and will require a no-objection before it is considered ready for implementation. Moreover, a RAP completion report confirming the satisfactory implementation of the RAP will be required prior to the start of civil works.</p> <p>The final version of the RAP will contain the results of a census survey covering: (i) current occupants of the affected area; (ii) characteristics of displaced households, including a description of production systems, labor, and household organization; and baseline information on livelihoods (including, as relevant, production levels and income derived from both formal and informal economic activities) and standards of living (including health status) of the displaced population; (iii) the magnitude of the expected loss--total or partial--of assets, and the extent of displacement, physical or economic; (iv) information on vulnerable groups or persons, for whom special provisions may have to be made; (v) provisions to update information on the displaced people's livelihoods and standards of living at regular intervals so that the latest information is available at the time of their displacement; (vi) land tenure rights; (vii) patterns of social interaction in the affected communities, including social networks and social support systems, and how they will be affected by the project; (viii) public infrastructure and social services that will be affected; and (ix) social and cultural characteristics of displaced communities, including a description of formal and informal institutions that may be relevant to the consultation strategy and to designing and implementing the resettlement activities. The draft RAP will contain details regarding the methodology used to identify losses and impacts – both temporary and permanent – as well as the calculations used to determine the full replacement cost of properties and assets. In addition to cash compensation, the RAP will also clearly describe any additional measures, such as transitional income support and livelihood restoration plans that may also be offered to eligible Project-affected people.</p> <p>The question on the Communiqués has been answered under Claim 2 above.</p>
7.	<p>The Requesters allege that the houses of some [Project-affected people] have been</p>	<p><b><i>The marking of houses described in the Request is not related to the Project.</i></b></p>

No.	Claim	Response
	<p>marked for resettlement without any explanation, while other residents received the “<i>communiqué</i>” or a visit from law enforcement agents or authorities stating that they would have to leave their properties for the purposes of the Project. They claim that some hold titles to the properties they are being asked to vacate</p>	<p><b><i>Resettlement processes for the Project have not yet started. The draft RAP will be carefully reviewed by the Bank team and will be subject to relevant internal clearance processes.</i></b></p> <p>While some discussions with local communities and Project-affected people have been held as part of the RAP preparation process, these have been preliminary and are not final determinations of eligibility.</p> <p>The preparation of the RAP is the responsibility of the Government per the Legal Agreement and initial discussions were conducted by the RAP consultants hired by the PIU; they were limited to the Project area that stretches from the villages of <i>Agbodrafo to Aného</i>. Discussions with stakeholders and affected populations will continue throughout the RAP preparation process and formal consultations will be held directly with Project-affected people in order to determine eligibility, vulnerability, gather socio-economic and livelihood information, examine land tenure, identify the nature of the anticipated losses, and discuss compensation packages based on the principles and standards outlined in the RPF. The final details of the consultations, the participants and the locations will be shared with the Bank in the draft RAP.</p> <p>Management recognizes, however, that information provided by Government agencies to the affected communities at times can make it difficult to separate the activities supported by the Project and the unrelated implementation of government policies or enforcement of national law. The Bank has learned that Comex received a copy of the draft RAP prepared by the consultants hired by the PIU in June and started consultations with communities in the Project area. As this RAP was neither reviewed nor given a no-objection by the Bank, <b><i>the Bank has asked Comex to stop all engagements and consultations until the Bank-cleared RAP is ready to be consulted upon.</i></b> These premature consultations have contributed to the communities’ confusion. The Bank will work with the PIU to enhance communication and outreach to address this situation.</p>
8.	<p>[The Requesters] claim that [Project-affected people] have not received adequate and timely Project information and have not been meaningfully consulted about Project activities.</p> <p>[They] claim that, to date, insufficient information has been provided [and] that [Project-affected people] were not informed adequately about the resettlement process and related compensation.</p>	<p><b><i>The site-specific (Agbodrafo to Aného) ESIA and RAP are currently under preparation. The Request appears to refer to the Project’s framework documents (RPF and ESMF – which are not site specific), for which consultations were held with a broad range of stakeholders, including but not limited to people potentially directly affected by the Project.</i></b></p> <p>Consultations were held during 2017 in the localities of Tchekpo Deve, Katanga, Gbétsogbé, Agbodrafo, Aného, Agomè-Séva, Adamè and Agbétiko as part of the preparation of the RPF. The final version of the RPF contains lists of the participants in these consultations, photos of the proceedings, summaries of the information discussed, and questions raised during the sessions. The approved RPF contains details regarding the potential categories of Project-affected people and possible losses and impacts, including livelihoods, land, housing, and commercial structures, among others. It also contains details regarding the process to be used in each WACA country to prepare</p>

No.	Claim	Response
		the site-specific RAPs. The approved RPF and ESMF were publicly disclosed in-country and at the Bank's InfoShop in 2017 <sup>3</sup> .
9.	They stated that the results of a survey, which was conducted covering some of the [Project-affected people], was not made available to them	<p><b><i>Census and surveys of the potentially affected persons have started but have not been completed. Once the surveys are finalized, they will be further discussed and consulted upon with the Project affected population as part of the larger RAP consultation process. Any person or household affected by the implementation of the civil works must agree to the compensation package and their satisfaction with the compensation measures will be confirmed as part of the RAP completion report.</i></b></p> <p>The preparation of the RAP for <i>the coastal works from Agbodrafo to Aného</i> is currently underway. While some discussions with local communities and Project-affected people have been held as part of the RAP preparation process, these have been preliminary and are not final determinations of eligibility. The final version of the RAP must be reviewed and given the no-objection by the Bank and a RAP completion report confirming the satisfactory implementation of the RAP will be required prior to the start of civil works. The Project-level GRM is already operational and will continue to be available to all stakeholders during RAP preparation and implementation, as well as during the life of the Project.</p>

<sup>3</sup>ESMF Approved and disclosed on November 18, 2017 <https://documents1.worldbank.org/curated/en/926031511191770807/pdf/WACA-ESMF-Executive-Summaries-15-Nov-2017-11152017.pdf>

ESMF updated in 2021 to incorporate provisions for OP 4.09 and redisclosed in April 2021 [https://environnement.gouv.tg/wp-content/uploads/2021/06/Rapport-CGES-WACA-TOGO\\_actualise-avril-2021-ver\\_ok.pdf](https://environnement.gouv.tg/wp-content/uploads/2021/06/Rapport-CGES-WACA-TOGO_actualise-avril-2021-ver_ok.pdf)

RPF Approved and disclosed on the Bank's website on Dec 1, 2017 <https://image-bank2.worldbank.org/Search/28957464>

No.	Claim	Response
10.	<p>The Requesters claim that meaningful consultations with the communities were not held, but rather isolated meetings took place with certain individuals including community leaders.</p>	<p><b><i>The site-specific ESIA and RAP are currently under preparation and formal consultations with the affected communities on these instruments have only recently begun. The Request appears to refer to the preparation process for the Project’s framework documents (ESMF/RPF), for which consultations were held with a broad range of stakeholders, including but not limited to people potentially affected by the Project.</i></b></p> <p>Consultations for the RPF were conducted in several locations in the broad Project area and in Lomé in October 2017.<sup>4</sup> These consultations were not site-specific or focused on a particular activity because neither Project sites nor Project activities had been finalized at that point. The consultations included representatives of the various ministries, local authorities, village chiefs and community members, including representatives from several women’s organizations.</p> <p>The RAP preparation process for the <i>coastal works from Agbodrafo to Aného</i> that is currently under preparation will be focused on the discrete Project area and will involve direct consultation with Project-affected people and communities. The RAP preparation process outlined in the RPF includes several levels of consultation in order to ensure that the assessment of the impacts and methodology to determine eligibility and valuation of assets is as comprehensive and complete as possible.</p>

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<sup>4</sup> On October 16, 2017 in Tchekpo Deve, with 43 participants (including female participation through the associations ‘N’Godeha, Galagbleme, Novilolo, and Assinesse, and on October 26, 2017 in Aného, with 25 participants. Consultations were also conducted in the localities of Katanga, Gbétsogbé, Agbodrafo, Aného, Agomè-Séva, Adamè, Agbétiko.

**Annex 2.**  
**News Articles regarding Government Eviction Notices**  
**Unrelated to the WACA ResIP**

<https://afriquedirect.com/>

**Togo/Plage de Lomé : "le projet WACA ne demande pas le déguerpissement des occupants" martèle le coordinateur WACA-**

**Togo**

**La Rédaction**

**7 mois passé(e)s**

**1354 vues**



[PARTAGER](#) [TWEET](#) [PINTEREST](#) [GOOGLE+](#) [EMAIL](#)

Le projet WACA n'est lié au projet de déguerpissement des occupants de la plage c'est l'information étonnante que le coordinateur du projet WACA Dr Adou Rahim a donné sur une radio de la place. Et pourtant le sujet a marqué toute la semaine avec de vives réactions suite à la note du gouvernement appuyée par celle de la mairie Golfe 4, adressée aux occupants de la plage de déguerpir les lieux pour l'exécution du projet WACA.

Selon ce qui a été véhiculé tout au long de la semaine comme information, les occupants (commençant) de la plage sont invités à libérer les lieux pour permettre les travaux de lutte contre l'érosion côtière. Le projet WACA est un projet sous régional pour finir avec l'érosion côtière mais il n'a d'impact sur les activités qui se développent sur les plages a fait comprendre le coordinateur de WACA au Togo, Dr Abdou Rahim Alimi Assimiou.

*«Le projet WACA Resip ne concerne en rien le projet de déguerpissement initié par le gouvernement togolais», a-t-il martelé.*

Selon lui, le gouvernement a un projet de reaménagement du littoral du gouvernement et c'est ce projet qui nécessite la libération de la zone ce qui n'implique pas le projet WACA comme cela circule dans l'opinion.

Il faut rappeler que la dégradation du littoral due à l'érosion côtière devient de plus en plus inquiétante. C'est le mobile qui a amené le gouvernement et ses partenaires à élaborer le projet d'investissement et de résilience des zones côtières en Afrique de l'Ouest (WACA ResIP). Un projet sous-régional qui couvre six pays du littoral côtier Ouest africain dont le Togo.

Le projet a d'ailleurs un plan directeur qui prend en compte les occupants.

<https://afriquedirect.com/togo-plage-de-lome-le-projet-waca-ne-demande-pas-le-deguerpissement-des-occupants-martele-le-coordonateur-waca-togo>

## DERNIERES HEURES

### Plage de Lomé : le projet de déguerpissement n'a rien à avoir avec le projet WACA ResIP

Beaucoup de personnes continuent de faire la confusion entre le projet de déguerpissement mené par le gouvernement dans le cadre de l'élaboration du schéma directeur d'aménagement du littoral, et le Projet d'investissement de résilience des zones côtières en Afrique de l'ouest-Togo (WACA ResIP-Togo). L'Unité de gestion du projet revient encore une fois sensibiliser l'opinion sur cette question.

Il n'y a pas très très longtemps, c'est Jean-Pierre Fabre le maire de la commune du Golfe 4 qui voulant déclinier toute responsabilité dans le déguerpissement des riverains illégaux de la plage, a affirmé qu'il s'agit d'une initiative du gouvernement dans le cadre du projet WACA. Il avait en partie raison sur le fait que cela soit une entreprise gouvernementale. Mais, sur le deuxième point, il était passé à côté. **Le projet WACA n'est ni de près ni de loin concerné par le déguerpissement.**

Le gouvernement à travers le ministère de l'Economie maritime, de la Pêche et la Protection ...

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## 3 POLITIQUE

TOGOMATIN N° 886 DU MERCREDI 14 AVRIL 2021

### DERNIERES HEURES

... côtière, cherche à élaborer le schéma directeur d'aménagement du littoral pour une meilleure gestion de ce trésor national. Dans les jours qui ont suivi cette sortie de Jean-Pierre Fabre, le Dr Adou Rahim Alimi Assimiou, coordonnateur du projet WACA a fait une sortie médiatique pour expliquer que cela n'avait rien à avoir avec le projet dont il assure la gestion.

Malgré cela, la confusion se poursuit. Cela oblige donc l'Unité de gestion du projet WACA à poursuivre ses explications. « Cette initiative n'est pas liée au projet WACA. Il faut plutôt le lier au projet d'élaboration du schéma directeur du littoral. Le nouveau ministère chargé de la protection côtière a en charge d'élaborer un schéma directeur pour le littoral. Cela permettra

une occupation rationnelle du littoral. Cela permettra aussi d'identifier au niveau de la côte, les espaces où on peut faire de la valorisation foncière, les espaces où on peut construire certaines infrastructures. Le projet de déguerpissement ne regarde vraiment pas le projet WACA, mais, cela couvre l'ensemble de l'espace où intervient le projet WACA ».

« Dans le cadre du

projet WACA, s'il faut déplacer des populations, une étude d'impacts environnementales et sociales sera faite et tout un processus sera suivi pour que cela se fasse dans les normes », a ajouté le coordonnateur. Comme l'a dit ce dernier, le projet WACA intervient sur le littoral et accompagne plusieurs initiatives dont l'assainissement de la plage par l'Agence nationale

d'assainissement et de salubrité publique (Anasap). Et le ministère dirigé par Kokou Edem Tengue, est à la manœuvre tant en ce qui concerne le projet d'élaboration du schéma directeur du littoral (donc du déguerpissement), mais aussi, au niveau du projet WACA en collaboration avec le ministère de l'Environnement et des Ressources forestières.

Edem Dadzie

<https://www.republicoftogo.com/content/download/89602/1555058/file/Togo%20Matin%20N%C2%B0886.pdf>

TOGO

WEST AFRICA COASTAL AREAS RESILIENCE INVESTMENT PROJECT (P162337)

ADDITIONAL FINANCING – WEST AFRICA COASTAL AREAS RESILIENCE INVESTMENT PROJECT (P176313)

*Request for Inspection*

- LOCATIONS CITED IN THE REQUEST
- OTHER SITES REFERRED TO IN THE TEXT
- ⊙ PREFECTURE CAPITALS
- ★ NATIONAL CAPITAL
- MAIN ROADS
- MINOR ROADS
- ▭ PREFECTURE BOUNDARIES
- REGION BOUNDARIES
- INTERNATIONAL BOUNDARIES

