

Republic of Togo

Environmental and Social Impact Assessment for the Project of Adetikope Industrial Platform

Non-Technical Summary



Report n ° 106378 / A – 6th of November 2020

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Technical data sheet

Republic of Togo Environmental and Social Impact Assessment Study for the “ADETIKOPE INDUSTRIAL PLATFORM” Project Non-technical summary

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2. Summary description of the Project

2.1. Location of the Project

Adetikope IZ is located in the Maritime Region, 25 km from the center of Lome, along the national road 1 (RN1) leading to Burkina Faso. The site is located to the east of this road, on the lands of the village of Akplome, attached to the district Adetikope in the municipality of Agoe-Nyive 6, in the prefecture of Agoe-Nyive (formerly the prefecture of Zio), as shown in the Project location map below.

In the environment of the site, there are other industrial developments such as the *Société Nouvelle de Boissons* (SNB) which is contiguous to the PIA site on the north side. It specializes in brewing and the production of beverages. It will interact with the Project on the cumulative impacts at the level of traffic and the management of rainwater and effluents.

The site is surrounded by 4 villages: Adoglove, Akplome, Dzove and Lomegnokope.

2.2. Project component

The objective of the PIA Project is to develop an integrated industrial park offering 30-35 serviced plots with all the necessary services (water, electricity, sewers, etc.) and favorable economic and financial conditions for private companies to set up in the industrial zone once it is operational. The Project targets agrobusiness units in the sector of industrial processing of various agricultural products but is also open to other sectors such as clothing manufacturing, vegetable processing, building materials, consumer goods, etc.

The Project will cover an area of 140 ha. It will be developed according to a master plan, the main characteristics of which are visible on the figure below. Land use will be divided between industrial and commercial sectors, warehouses, container parks, cotton bale storage, parking lots, facilities and green spaces.

PIA includes different types of utilities and administrative buildings to offer a variety of services to businesses and industries:

- **Shared utilities:** electricity supply and distribution system, water management system covering water supply, wastewater and stormwater management and solid waste management system.
- **Common administrative buildings:** single-window clearance (SWC), police station, fire station and custom gate.
- **Green spaces** covering 3.7 ha.
- **Logistics infrastructure:** 2.4 km of proposed new road construction, parking and container yards.

The construction of the PIA is part of a large-scale economic development plan transcribed in the National Development Plan (NDP) 2018-2022.

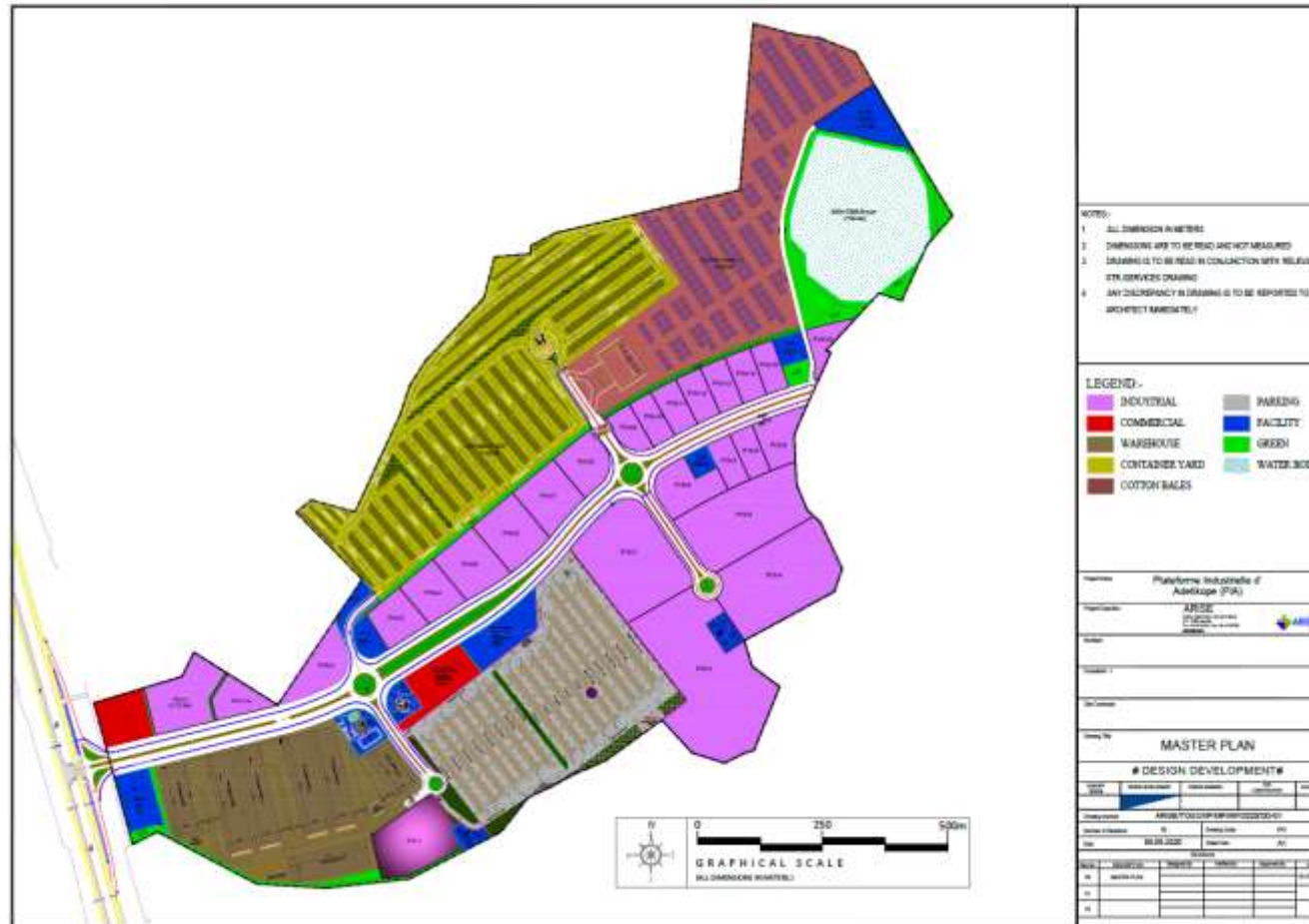


Figure 2: PIA master plan

2.3. Project activities

2.3.1. Construction Phase

Construction will be undertaken in phases and project proponent will ensure:

- All requested authorisations for construction.
- Access to the land with the implementation of the inventory of the project affected Persons, RAP and compensation in place as per planned access to the Site.
- An ESIA Report compliant with IFC standards and its disclosure.

Preliminary works have already started since they received authorization from ANGEL N ° 0143 / MEDDPN / CAB / ANGE / DEIE on June 15th 2020.

Clearing, excavation and earthworks will be carried out on the entire site. Once the earthworks are completed, only the site's roads will be paved. The wastewater evacuation (channel, central drain) and the water and electricity distribution network will be built and connected to the site's common infrastructure. Cement will be supplied by an external contractor and there will be no cement plant on site. Construction materials will come from existing and licensed quarries.

The construction contractors have been selected.

Construction began in July 2020 and will take 18 months. The Project will be completed according to the following phasing:

- the warehouse, part of the container yard will be completed in December 2020;
- the truck parking lot as well as the industrial sites will be completed in March 2021;
- cotton bales and other installations will be completed in January 2022;

Commissioning is scheduled for the fourth quarter of 2021 to allow full operation in the first quarter of 2022.

Construction activities will employ an estimated 500 workers at peak. Workers will not be housed on site, which excludes the presence of residential living quarters and on-site recruitment. Workers will be transported by bus by their employers.

2.3.2. Operational phase

The operational phase will involve the use of PIA shared utilities (energy, water, waste) and common infrastructure as well as daily operations of the various industries which rent a plot at PIA. A total of 12,000 jobs is estimated of which 7,000 direct jobs and 5,000 indirect jobs and around 3,000 inhabitants have been planned for the operational phase of PIA.

The operational phase of the zone shall witness the full exploitation of the created infrastructure and also the operation of the industries. The expected operations shall create an impact by the utilisation of the resources (energy, water, raw materials) thereby resulting in emissions as well as solid/liquid waste including noise and other atmospheric emissions

which will need mitigations measures for control of the adverse impacts due to the operation of the zone.

The facility buildings, structures and the industries shall be accessible to the investors, workers and visitors within the zone, including the green and open spaces. Besides, the facility buildings like fire-station and police station shall be a great relief to the employees and the material within the zone by ensuring security and safety including emergency responses within the zone.

2.4. Regulatory framework of the Project

The Project will comply with applicable environmental and social legislation in Togo and in particular with:

- Decree n°2017-040 / PR of 23 March 2017 setting the procedure for environmental and social impact studies.
- Law n° 2008-005 of May 30, 2008 on the framework law on the environment.
- Law n°2006-010 of December 13, 2006 on the Labor Code of the Togolese Republic.
- All sectoral decrees regulate water, air quality, noise, waste management.

The Project will comply with Arise/PIA ESG standards; namely the Arise/PIA Environmental Sustainability Policy and Arise/PIA Health and Safety Policy. These documents list the Company's commitment to managing business activities to reduce risks to the environment and communities, and the commitment to provide a healthy and safe workplace.

Furthermore, the Project will be guided by international standards and best practices, notably:

- [IFC's Performance Standards on Environmental and Social Sustainability](#) (2012).
- World Bank Group General Environmental, Health, and Safety Guidelines (2007).

The Project ESIA studies the impacts of the activities of the PIA Project which covers site servicing and the construction and operation of common infrastructure that will be made available to companies wishing to locate in the Project area.

The Project ESIA does not study the impact of the activities of companies that will establish themselves in the industrial zone once it is operational. Each of these companies must therefore, in accordance with Decree n°2017-040/PR, carry out a simplified or in-depth ESIA according to the specific categorization of its Project.

In addition, the industries will have to conform to the General Operational Guidelines issued by PIA.

3. Potential impacts and mitigation measures

3.1. Methodology

The environmental impact assessment was conducted by an independent team of environmental and social specialists, both Togolese and international. The impact assessment methodology involves of a systematic process derived from the approaches of the World Bank and ISO 14001.

This approach considers:

- **Impact factors** *i.e.* the activities, consumption or emissions of the Project which could be the source of impacts on the environment; and
- **Sensitive components** of physical, natural and human environments.

Identified sensitive components of the environment are as followed:

- **Physical:** climate and air quality, hydrology and hydrogeology, geology, topography and soils, landscape.
- **Natural:** protected areas, habitat and flora, fauna, ecosystem services.
- **Human:** demographic balance including migration, women and gender issues, vulnerable groups, land tenure and land use, economic activities, livelihoods and local economy (employment), habitat and settlements, health and safety, cultural heritage.

Impact analysis then determines how impact factors can affect each sensitive component of the environment in order to systematically identify the environmental and social impacts due to the Project, whether direct or indirect.

The last step is to identify the avoidance (A) and reduction (R) measures for the potential impact, and then to estimate the residual impact once these measures are taken into account. Compensation measures (C) only apply to residual impacts considered to be significant. Compensation measures (C) are implemented only if avoidance and reduction measures cannot be implemented or are deemed insufficient.

Stakeholder views, concerns and expectations relating to the Project and its impacts and potential mitigation measures, as raised during the consultation phase (cf. § 4), are also taken into account.

The impact analysis then feeds into the development of an Environmental and Social Management Plan (ESMP). The ESMP is an operational document, which defines how mitigation measures proposed in the impact analysis will be implemented, including objectives and responsibilities for implementing the measures and procedures.

3.2. Positive impacts

The Project will strongly contribute to the economic growth of Togo and will create opportunities for businesses and the socio-economic development of the country. Project benefits include:

- A direct foreign investment of approximately USD 1.5 billion.
- Contributing to industrial development and diversification of the national economy by offering high quality locations for the establishment of raw material companies that will process the raw material in particular the agro-commodities available within Togo.
- Increasing the attractiveness of Togo for more domestic and foreign investment leading to business creation, job and added value creation along with overall economic growth for the country.
- Increased product transformation in Togo leading to more favourable terms of exchange and increased profits made in Togo.
- Creation of employment opportunities for national workers during construction and operational phases.
- Creation of opportunities for Togo companies to provide services and supplies during construction and operation.

The Project will have a major positive impact for populations living in the vicinity of the Project site through the creation of job and economic opportunities which will increase local economic dynamism.

About 500 jobs will be created during the construction phase, and the income paid to workers will be re-injected into the local economy, benefiting shopkeepers and craftsmen who themselves could capitalise on opportunities to sell products and services to site workers.

In the operational phase, 7,000 direct jobs and 5,000 indirect jobs could be created according to projections made by PIA. The Project will transform the local economy by providing jobs that will reduce reliance on relatively low-income agricultural employment and will diversify the existing skills of the people.

3.3. Impacts on the physical environment

3.3.1. Baseline conditions

The Project site is located in the large peneplain of southern Togo. The relief is monotonous and barely contrasted with decreasing altitudes from north to south. The dominant soils are poorly developed soils; ferruginous soils; ferralitic soils; hydromorphic soils. The site's soil has a sandy and clayey texture.

The landscape of the study area is characterized by mosaics of fields and fallow land. The landscape interest of the site is low due to its anthropized nature, the absence of high points

offering panoramic views or natural sites of tourist interest (lakes, waterfalls, etc.). The Project site does not have a unique or remarkable landscape character.

The average annual rainfall is around 900mm and the average monthly temperatures vary between 25 and 28 degrees Celsius. The average sunshine is around 4.4 Kw / m² / day and the winds come mainly from the southwest sector, blowing from the ocean. Wind speeds are mostly moderate. There are very few extreme wind speeds.

The Project is located in the south of Togo, which is drained by three large rivers (Mono, Zio and Haho) and smaller rivers (Lake Boko, Gbaga channel). The available water reserves are constituted by the tributaries of the Zio river and the lagoon system. At the end of the network constituted by the Zio and its tributaries, its waters feed the coastal lagoon system located in coastal depressions and whose surrounding mudflats are colonized by mangrove vegetation (Guyot & al 1990). Zio is characterized by its flow rate and the permanence of its flow. The mean annual flow at the mouth is 9.9 m³/s. Like the bimodal rainfall regime, the Zio hydrologic cycle also exhibits a bimodal regime. The Zio watershed is located upstream of the site and part of its depression extends over the northeastern part of the site in the form of a small flood zone.

The underground resource is contained in the aquifer rocks which form the geological bedrock of the area. In the formations of the coastal sedimentary basin, there are four aquifer horizons which are distinguished by the nature of the reservoir rock and by their different hydraulic loads. Surface water and groundwater were analyzed. The results are contained in the ESIA report.

It is important to note the presence of the SNB (*Société Nouvelle de Boissons*) which produces effluents discharged on the PIA site and which can be a source of pollution on the site for soils and surface water.

In addition, road traffic on the national interstate road (RN1) which borders the site to the west can be a source of air pollution and noise pollution.

3.3.2. Key impacts

Given the sensitivities of the physical environment, the following major potential impacts have been identified.

Construction phase:

- Smoke and greenhouse gas emissions from engines of construction machinery, vehicles and trucks, land clearing activities and green waste burning.
- Dust emission from earthmoving operations, storage of excavated materials and products, material crushing units.
- Pollution of the superficial unconfined aquifer by wastewater and accidental spills.
- Degradation of soil quality in the event of accidental spillage of any hazardous liquid products or waste on the ground and infiltration through the ground.
- Degradation of the sound and vibration environment because of the functioning and traffic of machines and vehicles.

- Soil erosion due to the site clearance and removal of vegetation.

Operation phase:

- Reduction in water resources available to other users due to the use of groundwater for the Project.
- Pollution of water resources in case of mismanagement of the discharges of the treatment plants and waste in the central drain.
- Visual impact with the new PIA area instead of crops and natural vegetation.
- Soil sealing increasing the runoff volume to be managed on-site and downstream.
- Modification of the water management system on the site leading to modifications of the natural hydraulic patterns outside the site limits, with various environmental and health consequences.

3.4. Impact on the natural environment

3.4.1. Baseline conditions

The study area is marked by a subequatorial climate characterized by four seasons, including a large rainy season from March-April to June and a large dry season from December to March.

The fields are the most represented since the majority of the space is occupied by fields / fallows (96%) of which 11.28% are partially flooded. The natural vegetation formations in the Project area are largely anthropized and no longer include large areas of forest with preserved natural vegetation. Many invasive species have colonized the area and compete with the native flora.

In total, the flora has 156 plant species divided into 122 genera and 47 families. This flora comprises 19 cultivated species, *i.e.* a rate of 18.48% of the total flora. The species not assessed according to the IUCN vulnerability criteria are the most represented (97 species, or 63.40%). Moderately conserved species according to the IUCN represent 40 species, or 30.07%. Vulnerable species come last and are represented by a single species: *Mallotus oppositifolius* (Geisel.). It is a shrub generally used for medical and energy purposes such as firewood. We also note in this flora a priority food woody species of Togo (Eyog Matig et al., 2000): the baobab (*Adansonia digitata* L.) (Eyog-Matig et al., 2002).

Mammalian fauna mainly consists of small mammals, in particular mice. Seven (7) species belonging to two families of small terrestrial mammals have been observed or recorded. None of them are considered threatened, according to the IUCN criteria.

Other families such as butterflies and insects, amphibians or terrestrial reptiles are also present, but among these, none of the species has a vulnerable status according to the IUCN.

The site is poor in amphibians: of the 39 species listed in Togo, only two have been identified on the site (PNAE / MERF, 2002).

Birds are the most represented vertebrate taxon on the Project area. A total of 18 bird species belonging to 17 genera and 11 families were observed at the site. None of them are considered threatened, according to the statutes of the IUCN.

3.4.2. Key impacts

Given the anthropized ecosystems in which the Project will settle, the impacts on the natural environment, biodiversity and habitat will be limited to the following effects.

Construction phase:

- Destruction of habitats and associated flora, trees and herbaceous vegetation due to clearing, felling and deforestation of trees, excavations and earthworks.
- Destruction of poorly mobile fauna, such as juveniles.

Operation phase:

- Disturbances of the water management system (in particular with the installation of a drainage system) on the site, leading to modifications of the natural hydraulic patterns outside the site limits and possible pollution of environment due to contaminated runoff.

3.5. Social impacts

3.5.1. Baseline conditions

The Project site is located on the land of the village of Akplome, administratively attached to the district of Adetikope, the only district of the municipality of Agoe-Nyive 6 in the prefecture of Agoe-Nyive.

The Project area is surrounded by 4 villages: Adoglove, Akplome, Dzove and Lomegnokope. The Project site was acquired by the Togolese state in 2005 and has been used for a variety of agriculture including planting food crops and vegetables with around 300 farmers. The pond located to the east of the site is used by the villagers for irrigation. The site has neither cultural heritage nor inhabited human constructions.

The district recorded rapid growth from 2005 following the socio-political unrest that Togo has known. From this period, Adetikope recorded a massive influx of population which reached 45,000 inhabitants in the last national census of 2010. In 2020, Adetikope District would be populated by 57,476 inhabitants, based on demographic projections from the latest census.

Today, the district of Adetikope is made up of a multiethnic or even cosmopolitan population composed mainly of Kabyles (30%), Losso (25%) and Ewe (25%) which constitutes the oldest population (Dandonougbo, 2017).

According to the results of field surveys, non-natives are the majority in the 4 villages of the study area. The dominant religion is the Christian religion, followed by the Muslim religion, while animism is barely practiced.

None of these groups are recognized as indigenous by the international community or the Togolese government.

With its relatively favorable natural and climatic conditions, the district of Adetikope had, until the 2000s, an economy based almost exclusively on agriculture. It was therefore an important center of food production.

With the urban thrust and the extension of the fronts of urbanization of Lome, agricultural activity gave way, over time, to commercial and industrial activities. The most remarkable phenomenon is the rapid pace of establishment of infrastructure and commercial facilities in response to the growing needs of the emerging consumer society. The trade is structured around the main bi-weekly market located near the RN1.

One of the major challenges linked to the urbanization of the district of Adetikope and the villages of the study area lies in the establishment local equipment, infrastructure and socio-collective services that would meet the growing needs of the populations. Many public and private facilities are already present in the district: public primary and secondary schools, a public health center, private health centers and a gendarmerie. Basic social services such as borehole water sold by individuals, electricity supplied by the *Compagnie Energie Electrique du Togo* (CEET), mobile phone and Internet communications are also available.

However, the villages of Adoglove, Akplome, Dzove and Lomegnokope do not have adequate and easily accessible socio-community services in the areas of health, education, drinking water or public works, sanitation, water supply, energy, transport and communications adapted to their needs. Existing services are either dysfunctional, undersized (such as schools or health centers), or sometimes non-existent.

Thus, the state of the road network outside the RN1 is very degraded and difficult to use during the rainy season. There is no sanitation network and waste collection are not adapted to the needs of the population. Access to water is problematic due to the absence of public boreholes, which leads to the use of wells draining shallow water potentially contaminated by different categories of pollutants and which dry up in the dry season. The education and health infrastructures are mainly managed by private actors, with public schools sometimes far from villages. The four villages visited during the field survey are partially supplied with electricity by CEET and the *Togolaise des Eaux* network does not cover all the districts of these villages.

The infrastructures present in the district of Adetikope are difficult to access, geographically, by the populations of these villages because of their remoteness and the state of the roads.

3.5.2. Key impacts

The Project's social impacts are more significant in comparison with its environmental impacts. Indeed, as the site is largely cultivated and surrounded by 4 villages, the potential impacts on the local communities will be significant.

Preparation phase:

- Access to land leading to economic displacement for farmers and specific impacts on women and vulnerable people.

Construction phase:

- Various risks to workers' health and safety due to occupational and traffic accidents, spread of communicable diseases and risk of non-compliance with labour laws.
- Health and safety risks for villagers exposed to noise, dust and air quality degradation caused by passing construction site machinery and risks of communicable diseases stemming from site workers.
- Influx of workers and economic migrants affecting existing social structures in the villages.

Operation phase:

- Disturbances of the water management system (in particular with the installation of a drainage system) on the site, leading to modifications of the natural hydraulic patterns outside the site limits and possible pollution of environment due to contaminated runoff.
- Various risks to workers' health and safety due to occupational and traffic accidents, spread of communicable diseases and risk of non-compliance with labour laws.

3.6. Key impact management measures

For each impact, a set of standards and Project-specific mitigation measures have been identified, as well as compensation where necessary.

These measures are based on professional working procedures or international good practice. They include:

- Compliance with national regulation with regards to air, noise and water quality, worker's rights and compulsory land acquisition in the public interest.
- Compliance with international standards for environmental and social performance, as established in IFC Performance Standards.
- Good human resource management and guidance of workers, including appropriate training.
- Regular internal communication and structured engagement with external stakeholders, including affected local communities.
- Implementation of an HSE sensitization and training program for workers with regular safety briefings, safety signage, personal protective equipment and monitoring.
- Use of good quality equipment and vehicles, preferably new, and regular inspection and maintenance of work engine and equipment.
- Implementation of a Waste Management Plan and a Hazardous Products Management Plan for both the construction and operation phase.
- Development of an Emergency Preparedness and Response Plan in case of accidental spillage or other accidents.

- Grievance management procedures for affected communities, workers and other affected persons.

Additional key measures to mitigate potential impacts on the **physical environment** include:

- Implementation of wastewater treatment systems.
- Develop further detailed studies to identify the impact of the SNB liquid discharge on the soil and surface water of the PIA site.
- Implementation of collection, monitoring and waste treatment plan.
- Water resource monitoring.
- Maintaining the natural hydraulic patterns of the area and gathering of all water runoff in the central drain.

Key mitigation measures specific to activities that could impact the **natural environment** include:

- Request permits for land clearing from the ANGE prior to the start of clearance work.
- Implement a Biodiversity Management Plan covering a reforestation program, measures to preserve plant and animal biodiversity and invasive species management.
- Select indigenous and native flowering plants and ornamental trees to be planted in the PIA area.
- Ongoing monitoring and evaluation of environment management measures and performance, with corrective action plans where necessary.

Key mitigation measures related to **social impacts** include:

- Development and implementation of a Livelihood Restoration Plan (LRP) that meets national legislation and IFC PS5 requirements.
- Management of the workforce and working conditions in accordance with Togo's national regulations, the ILO conventions ratified by Togo and the requirements of IFC Performance Standard 2.
- Priority recruitment of local labour, particularly those affected by the Project (PAP households) with equal skills.
- Inclusion of clauses for local recruitment, local sub-contracting and transfer of skills with local companies in the Tender Documents for Project construction works.
- Prohibition of recruitment at the gate(s) of the construction site and setting up a decentralized recruitment office.
- Establishment of positive discriminatory measures that will promote the employment of women.
- Implementation of a Traffic and Road Safety Plan.
- Implementation of a Hygiene, Health and Safety at Work Plan.
- Implementation of the Stakeholder Engagement Plan (SEP) and the claim management mechanism.

- Ongoing monitoring and evaluation of social management measures and performance, with corrective action plans where necessary.

The above mitigation measures have been included in an Environmental and Social Management Plan that will have to be implemented through a comprehensive Project Environmental and Social Management System (ESMS) that will be used to deliver the Project's environmental, social, health and safety regulatory compliance objectives and other related commitments. Measures will be adopted by PIA and imposed as contractual conditions on the Contractors commissioned for the Project. Monitoring and control will be conducted to ensure their effectiveness.

As mentioned above, detailed policies, plans and responsibilities will be developed to implement the ESMS. The timing of the development of the plans will be staged – construction related plans will be finalized and in place prior to the start of construction and the operational related plans will be finalized and in place prior to the start of operations.

4. Consultation and management of grievances

4.1. Stakeholder Engagement Plan

PIA has adopted a Stakeholder Engagement Plan (SEP), which formed a key part of the ESIA process. The SEP analyses and identifies stakeholders, describes consultation and disclosure actions for different phases of the Project and sets out the grievance mechanism.

4.2. Stakeholder consultations

PIA and the project's ESIA team (Antea Group) have undertaken several consultations with stakeholders as part of the ESIA process.

During the socio-economic field surveys conducted in July 2020, field surveys, individual interviews, focus groups and public information meetings were carried out at different times in the following villages: Dzove, Adoglove, Lomenyonkope and Akplome.

Investigations were also carried out with the head of Adetikope district.

The objectives of these surveys were to:

- collect the necessary information to take into account the real social issues of the project;
- inform about the project and the study in progress;
- collect the concerns of the populations and the point of view of the stakeholders on the impacts, the potential mitigation measures and the challenges.

The table below presents the different consultations organized.

N°	Activities	Dates
1	Meeting with Head of District of Adetikope	08/07/2020
2	Public consultation with the population and local authorities of Dzove	04/07/2020
3	Public consultation with the population and local authorities of Adoglove	06/07/2020
4	Public consultation with the population and local authorities of Akplome	04/07/2020
5	Public consultation with the population and local authorities of Lomenynokope	06/07/2020
6	Meeting with Agoe Prefecture	08/07/2020
7	Meeting with Municipality of Agoe Nyive 6	08/07/2020
8	Meeting with Prefectural Directorate of the Environment	09/07/2020
9	Meeting with NGO working in Adetikope district	09/07/2020
10	Meeting with Prefectural Directorate of Agriculture, Livestock and Fisheries	15/07/2020
11	Meeting with Ministerial Directorate of Industry	04/08/2020
12	Meeting with Presidential office for priority Projects CPES	09/07/2020
13	Meeting with Administrative Society of the Free Zone (SAZOF)	08/07/2020
14	Meeting with High Authority for Quality and Environment (HAUQUE)	09/07/2020
15	Meeting with Association of Free Zones Companies (ASOZOF)	14/07/2020
16	Meeting with National Agency for Public Health (ANASAP)	10/07/2020
17	Meeting with <i>Société Nouvelle de Boissons</i> (SNB)	14/07/2020
18	Meeting with National Environment Management Agency (ANGE)	05/08/2020



Figure 3: Pictures of public consultations

Note that a Covid-19 protocol has been put in place with the deployment of information posters, the spacing between participants and the compulsory wearing of face masks, the provision of soap and water for washing hands at the start of the session and the limitation of the number of participants.

4.3. Management of grievances

PIA has set up a grievance mechanism to receive and resolve any complaints from stakeholders and especially Project-Affected Persons, as well as ensuring fair and equal treatment for all complainants.

Persons can use this mechanism without giving up their right at any time to recourse to the Togo's justice and legal system. This mechanism covers any type of complaint whatever the subject and nature, and includes the following steps:

1. Submission of complaint.
2. Registration of the grievance and acknowledgement of receipt provided to the complainant.
3. Internal assessment of the admissibility and categorization of the complaint.
4. Simple response for inadmissible complaints or immediate resolution where possible.
5. Investigation of complaints.
6. Proposal of a resolution to the complainant.
7. Resolution and closure of the complaint.
8. Mediation which can be triggered if the complainant does not accept the proposed resolution.
9. If the Project cannot resolve the complaint to the satisfaction of the complainant, legal remedy is available to the complainant.

Target timescales for resolving a complaint are:

- 14 days for resolving standard complaints.
- 24 days for high significance / complex complaints.

The Project monitors and periodically reports on grievance management to ensure that any systematic causes of grievances are addressed as quickly as possible and ensure that all grievances are managed and resolved in a fair, effective and timely manner.

At present, the contact person with whom stakeholders can lodge a grievance (or ask a question or leave a message) is the PIA Community Liaison Officer (CLO):

Frank Owusu-Ansah

+228 70 58 92 04

frank.owusu@olamnet.com