Report Number: ICRR0024646

1. Project Data

Project ID P149277	**Project Name** TOGO Mining Governance and Development
Country Togo	**Practice Area(Lead)** Energy & Extractives

L/C/TF Number(s)	Closing Date (Original)	Total Project Cost (USD)
IDA-57350	31-Dec-2020	15,158,983.69
Bank Approval Date	**Closing Date (Actual)**	
19-Nov-2015	30-Jun-2022	

	IBRD/IDA (USD)	Grants (USD)
Original Commitment	15,000,000.00	0.00
Revised Commitment	14,954,674.13	0.00
Actual	15,158,983.69	0.00

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2. Project Objectives and Components

a. Objectives

The Original Project Development Objective (PDO) was “to streamline the institutional arrangements of key organizations in the extractive industries to strengthen their efficiency and accountability for effective management of the sector.” (Financing Agreement, page 6). The PDO was phrased identically in the Project Appraisal Document (PAD) (PAD, page iii).

The PDO was revised during Restructuring 1 in November 2019 to read: “To strengthen efficiency and accountability of key organizations responsible for management of the mining sector”.

For the purposes of this Implementation Completion and Results Report (ICR) review, the PDO will be parsed as follows:

PDO 1: To strengthen the efficiency of key organizations responsible for managing the mining sector.

PDO 2: To strengthen the accountability of key organizations responsible for managing the mining sector.

The original PDO statement is not used in this Review, as the revision only clarified the phrasing without altering its substance.

b. Were the project objectives/key associated outcome targets revised during implementation?

Yes

Did the Board approve the revised objectives/key associated outcome targets?

Yes

Date of Board Approval

20-Nov-2019

c. Will a split evaluation be undertaken?

No

d. Components

1. Original components

The Project was designed to support the modernization of the mining sector and improve the investment climate for mineral development. It also aimed to reduce the Government’s role as an operator in the sector while strengthening its regulatory and planning functions.

Component A: Mining Governance, Transparency, Oversight and Efficiency (cost at appraisal: US$8.45 million; actual cost: US$9.71 million) comprised six sub-components:

Sub-component A.1 Mining Cadaster and National Geological Database aimed to implement a modern, digitized mining cadaster, covering procedures for the award, refusal, and revocation of licenses, and to improve the national geoscientific database, making it publicly accessible.

Subcomponent A2 Transaction Advisory Services for Assessment of Mineral Development Proposals aimed to improve contractual arrangements and technical skills within relevant government agencies.

Subcomponent A3 Mineral Production Monitoring and Oversight aimed to support National Revenue Office (OTR) and Ministry of Mines and Energy (MME) in strengthening monitoring of mineral production

data, inspection of tax filings, and evaluation and certification of exported precious and semi-precious stones.

Subcomponent A4 Organizational Development of the MME aimed to improve the organizational structure of the MME - including the Directorate for Mines and Geology (DGMG) and the Department for Mine Development and Control (DDCM) - based on the 2013 audit by the African Development Bank (AfDB) and additional analysis under the Project. It was to focus on investments, operations management, job creation, and economic diversification, and clarifying the OTR's role.

Subcomponent A5 Strengthening of Corporate Governance Structures of State-Owned Enterprises (SOEs) in the Mining Industry aimed to assess the organizational capacity of the National Phosphate Company of Togo's (SNPT's) and state asset management agencies in areas such as technical operations, financial management (FM), procurement, investment decision-making, and governance. It also supported environmental and social audits of SNPT's mining operations.

Subcomponent A6 Management of artisanal and small-scale mining (ASM) aimed to conduct a sector assessment and prepare an action plan to support monitoring and formalization of ASM activities. It also provided TA on environmental and social management, promoted fair trade and processing practices, and evaluated working conditions for women in the ASM sector.

Component B: Environmental, Social and Economic Development from Mining Operations (cost at appraisal: US$4.3 million; actual cost: US$3.2 million) comprised three sub-components:

Subcomponent B1. Higher Education Sector Support and Public Access to Information about Mineral Development aimed to promote the next generation of mining specialists and facilitate public access to, and awareness of, mining activities. This included the creation of virtual, physical, and potentially mobile information centers.

Subcomponent B2. Environmental and Social (E&S) Management of Mining Operations and Support to Community Development Platforms aimed to undertake a Strategic Environmental and Social Assessment (SESA) to improve coordination between the Ministry of Environment and Forestry (MERF) and the National Environmental Regulation Agency (ANGE). It also aimed to establish platforms for accountability, dialogue, and awareness-raising.

Subcomponent B3. Infrastructure and Economic Linkages from Mining aimed to support the establishment of small and medium enterprises (SMEs) and public-private partnerships to increase value creation in the mineral sector and promote economic diversification. Also, a study was to be financed on potential infrastructure linkages between mine sites and nearby communities for combined use.

Component C: Project Management and Coordination, including Preparatory Project Financing (cost at appraisal: US$2.45 million; actual cost: US$2.25 million) aimed to provide implementation support to MME (the implementing agency) and the Project Implementation Unit (PIU).

2. Revised Components:

- **During Restructuring 1 in November 2019**, following the mid-term review (MTR) recommendations, some Project activities were refocused to build on successful sub-components with significant demand and align better with key government priorities. Overall, the Project's scope

remained the same: the increase in activities under Sub-component A.2 was counterbalanced by the cancellation of Sub-component B.3. Specifically:

- *Sub-Component A.2 Transaction Advisory Services for Assessment of Mineral Development Potential* was expanded to include additional activities - an evaluation of phosphate deposits, preparation of a concept for a phosphate fertilizers production master plan, and an assessment of SNPT's role in the process – to support the Government's renewed emphasis on phosphates as a pillar of the National Development Plan (NDP).
- *Sub-component B.3 Infrastructure and Economic Linkages from Mining* was canceled, as no new infrastructure investments were expected under the Project.
- *Sub-component A.5 Strengthening of Corporate Governance in SOEs* was moved under *Sub-component B.2 E&S Management of Mining Operations and Support to Community Development Platforms,* since the SOE support was limited to E&S management.

e. Comments on Project Cost, Financing, Borrower Contribution, and Dates

Project Cost: The appraisal estimate was US$15.2 million (PAD, page 11), and the actual disbursement was also US$15.2 million.

Project Financing: The Project was financed by an International Development Association (IDA) credit.

Borrower/Recipient contribution: The Borrower contribution was estimated at US$0.2 million at appraisal, but there was no actual Borrower contribution.

Project Dates: The Project was approved on November 19, 2015, and became effective on March 3, 2016. The MTR was finalized on January 28, 2019. The Project was restructured twice: (i) on November 20, 2019; and (ii) on November 23, 2021. The original closing date was December 31, 2020. The Project was extended twice, for a total of 18 months (one year and six months), to June 30, 2022, which was the Project's actual closing date.

Restructurings:

Restructuring 1 (November 20, 2019) was based on the findings of the MTR. Although it involved a modification in the phrasing of the PDO, its substance remained unchanged, and there was no reduction of the Project's scope or ambition, as correctly noted in the Restructuring Paper (page 9). Specifically, the following changes were made:

- Revision of the PDO to improve its clarity and better reflect current Government priorities, without altering its substance or ambition. The original PDO was: "To streamline the institutional arrangements of key organizations in the extractive industries to strengthen their efficiency and accountability for effective management of the sector." The revised PDO became: "To strengthen efficiency and accountability of key organizations responsible for management of the mining sector".
- Adjustment of the results framework (RF) to align indicators with the revised PDO, particularly focusing on the outcomes related to efficiency and accountability, and to better link IRIs to the PDO indicators, without changing the Project's scope.
- Reallocation of funds across tasks following changes in some Sub-components (see section 2.d.2), with Component B costs reduced from US$4.3 million to US$3.5 million, and corresponding

increases in Component A from US$8.45 million to US$9.1 million and Component C from US$2.45 million to US$2.6 million.
- Extension of the closing date by 12 months, from December 31, 2020, to December 31, 2021, to allow for completion of ongoing activities.

Restructuring 2 (November 23, 2021) was needed only to extend the closing date by 11 months, from June 30, 2023, to May 31, 2024, to allow for completion of key activities, including geodata acquisition and investment facilitation.

Split evaluation. A split evaluation is not required. While both the PDO and several PDO indicators were rephrased, these changes served only to clarify objectives and strengthen outcome measurement. There was no change in the substance of the PDO, the Theory of Change, or the overall Project's scope and ambition. While Restructuring 1 involved the dropping of *Sub-component B.3 Infrastructure and Economic Linkages from Mining* and the related IRIs (under the accountability objective), this did not affect the PDO targets and was offset by a scope increase under the efficiency objective, with additional support for operational compliance, production monitoring, geoscientific data acquisition, and promotion of phosphate deposit development. Consequently, efficacy is assessed based on the revised PDO, RF indicators, and targets as defined at Restructuring 1 in November 2019, with references to relevant changes in activities and IRI targets made at that time.

3. Relevance of Objectives

Rationale

Country and Sector Context. At Project appraisal, Togo's mining sector accounted for 31 percent of exports, yet contributed only three percent to GDP and four percent to budget revenue. Recognizing this imbalance, the Government prioritized sector reforms to unlock the sector's full economic potential. The objective was to increase the mining sector's contribution to sustainable economic development. The Government priorities were aligned with the African Mining Vision, a policy framework adopted by the African Union in 2009 with strategic pillars of sector transparency, diversification, contribution to local and national economic development, realized ASM potential, and strong E&S standards. However, significant barriers hindered progress toward these goals. Key challenges included: (i) poor governance and weak management of environmental, social and economic impacts of mining; (ii) overlapping roles and inadequate capacities of sector institutions; (iii) weak accountability and transparency of revenue collection; (iv) lack of reliable data on mineral production and revenues generated, including the artisanal and small-scale mining activities; and (v) poor corporate accountability of the state-owned National Phosphate Company of Togo (SNPT), which was contributing to environmental degradation. With mining operations expanding since 2000, these issues intensified. Environmental and social consequences were widespread, including land expropriation without adequate compensation, farmland and water resource degradation, and significant negative social and environmental impact on communities near mining sites. The Project was designed to support the Government's mining sector priorities of streamlining the institutional set-up to increase efficiency of decision making related to policy formulation, planning, and investments; enhance sector transparency and institutional accountability; and promote private sector participation. (PAD, page 7; ICR, pages 1-2)

Relevance to Government Strategies at closure. The Project was aligned with Togo's National Development Plan (PND) 2018-22, specifically *Strategic Direction 2: Developing Agricultural Processing, Manufacturing and Extractive Industry Hubs.* Within this Direction, it supported *Expected Outcome 2.3: Togolese Industry Is Developed, Environmentally Friendly, Integrated with the Rest of The Economy, and Creating Jobs*. This outcome emphasized positioning Togo as a center for extractive industries, which required, among other goals, the strengthening of the mining sector through the diversification and valorization of mineral resources. (PND 2018-2022, page 87)

Relevance to the WBG's Assistance Strategies at closure. The Project's PDO was aligned with the WBG's Country Partnership Framework (CPF) FY2017-20, which was extended to FY2022 and was in effect at the time of Project closure. Specifically, the Project supported CPF's *Focus Area 1: Private Sector Development and Job Creation*, and more precisely, *Objective 1.2: Improve Business Environment and Employment Opportunities.* This objective emphasized leveraging the mining sector as a driver of sustainable national wealth by promoting good governance practices, including transparency, accountability, and efficiency within the sector. (CPF, pages 19-21)

Previous sector experience. In the five years preceding Project approval, the World Bank maintained proactive engagement in Togo's mining sector, notably through sustained policy dialogue with the Government. The World Bank's operations in the country included the following: (i) the First and Second Extractives Industry Transparency Initiative (EITI) Implementation Support Grants (P117960 and P123524), which enabled Togo to achieve EITI compliance and secure a seat on the International EITI Board; and (ii) the Legal and Mineral Rights Cadaster Reform (P146403), which supported a review of the new draft mining code. The Bank also supported the implementation of the Phosphate Development Strategy and a development policy operation with actions related to phosphate management by the SNPT. In addition, the Bank produced several analytical studies, including the 2013 mining sector diagnostic assessment *Togo - Phosphates: Review of Ongoing Phase 1 Investments by SNPT*, which recommended the financing of a TA operation to support mining sector development. (PAD, page 8)

The PDO was aligned with the country's development needs and government priorities, as well as with the WBG's assistant strategies. The Project built on the WBG's sustained and in-depth engagement in supporting mining sector development in Togo in the years leading up to Project appraisal. Accordingly, the rating for Relevance of Objectives is High.

Rating
High

4. Achievement of Objectives (Efficacy)

OBJECTIVE 1
Objective
To strengthen the efficiency of key organizations responsible for managing the mining sector.

Rationale

A Theory of Change (ToC) was not required at the time of PAD preparation, so it was only included later in the ICR (ICR, page 3). The ToC listed the Project's activities, short-term outcomes, PDO outcomes, and long-term impacts. To achieve Objective 1, the Project provided supported governance, transparency, oversight, and efficiency improvements in the mining sector. Key activities were: developing a cadaster and geological database, supporting sector strategy and capacity building, improving mine inspections and production monitoring, advising on investments and operations, and formalizing ASMs. Expected short-term outcomes included: an accessible online mineral cadaster system, a digitized geological information system, an adopted mineral sector policy and implementation plan, regular mining site inspections, improved environmental compliance by mining companies, and an increased number of formalized ASMs. The expected PDO outcome was improved efficiency of mining sector institutions. Enabling conditions (critical assumptions) were listed as: (i) integration of governance, transparency, and sustainability goals into Government planning; and (ii) synergies with other ongoing initiatives. The ToC provided a sound rationale for Project implementation, a comprehensive presentation of the activities, and meaningful critical assumptions.

The RF indicators, as revised during Restructuring 1, were consistent with the PDO and expected outcomes. The RF under Objective 1 included five PDO indicators (including one sub-indicator) and seven IRIs (including one sub-indicator). The PDO indicators were: a modernized and accessible mineral cadaster system, share of mining companies in compliance with environmental requirements, an endorsed and monitored mineral sector policy, number of Project beneficiaries, and share of female beneficiaries (a sub-indicator). The IRIs were: number of mine sites subject to regular inspections, availability of a digitized geological information system online, land area covered by geo-physical surveys, preparation of a phosphate development plan, number of artisan miners legally registered and formalized, and number of people who received technical training. The RF indicators provided a relatively good coverage of the expected results, but some areas were insufficiently captured – specifically those related to the legal framework and institutional restructuring. The PDO indicators were mostly at the intermediate outcome level, while the IRIs were at either the intermediate outcome or output level. In general, IRIs did not support the PDO indicators but instead measured separate, second-tier results, while the PDO indicators captured most critical outcomes. Considering this was a TA project, such a design was appropriate.

Efficacy under Objective 1:

IRI results:

1. " Number of mine sites which are subjected to production monitoring inspections per year" (baseline: zero, target: 35 sites). The achievement at closure was 38 sites, the target was exceeded.

2. "Number of nationals trained in extractive industries (EI) skills" (baseline: zero, target: 500). The achievement at closure was 925, the target was exceeded. The gender-specific target (share of female beneficiaries) was also exceeded.

Note: The target for the gender-specific sub-indicator was reduced from 35 to 20 percent during Restructuring 1 in November 2019; the ICR explains that the original target was considered unrealistic due to the limited number of female staff in line ministries (ICR, page 29).

3. "Geological and Mineral Information System is digitized and accessible online (Yes/No)". The target was achieved.

4. “Number of artisanal miners who are legally registered and formalized” (baseline: zero, target: 100). The achievement at closure was 88, the target was 88 percent (substantially) achieved. As explained in the ICR, this was due to the absence of clear regulatory procedures for ASM registration.

Note: The target for this indicator was reduced during Restructuring 1 in November 2019, from 150 miners to 100 miners. As noted in the ICR, the reduction was due to the realization that the original target was unreasonably high (ICR, page 29), particularly given the absence of clear regulatory procedures for ASM registration. The original target was 59 percent (partially) achieved.

5. “Land area covered by airborne geo-physical surveys (Square kilometer(km2))” (baseline: zero, target: 2,500 km2). The achievement at closure was 56,000 km2, the target was significantly exceeded.

6. “An investment plan is prepared for development of carbonated phosphate deposits (Yes/No)”. The target was not achieved due to the cancelation of activities related to the carbonated phosphate deposit and the associated investment plan, following a change in MME leadership in 2020 and a shift in the Government’s investment policy.

PDO outcomes:

1. “Modernized mineral cadaster management system is accessible online (Yes/No)”. The target was achieved. The ICR noted that the achievement of this target depended on: (i) the consistency of the new mining cadaster system with updated legislation, and (ii) public accessibility of title information to enable informed decision-making.

2. “Percentage of mining companies which comply with environmental certification requirements” (baseline: zero, target: 60). The achievement at closure was 70, the target was exceeded.

3. “Mineral sector policy is endorsed and systematically monitored (Yes/No)”. The target was achieved. The ICR noted that the target was considered achieved when the mineral sector policy, including vision, strategic goals, and an implementation action plan, was endorsed by the ministry.

4. “Direct project beneficiaries (Number)” (baseline: zero, target: 6,300). The achievement at closure was 7,135 beneficiaries, the target was exceeded. The gender-specific target (share of female beneficiaries) was also exceeded. The ICR clarified that the beneficiaries were defined as: training and workshops participants, students at the Faculty of Science, members of formalized ASM cooperatives, and participants in forums or networks supported by the Project.

Overall, all PDO-level targets under Objective 1 were achieved or exceeded. Most IRIs were also achieved or exceeded, except for two, one of which - investment plan for phosphate deposits - was dropped due to a change in Government priorities and the other – number of registered ASMs - was not fully achieved due to an unrealistic target set without considering the unclarity of regulatory procedures for ASM registration.

Key achievements included (ICR, pages 7-8):

- **Digital cadaster management system.** Prior to the Project, data were stored in paper format. The Project supported the development of the online cadaster and geological information systems, both publicly accessible. By June 2021, these systems were functional, enabling online management of

mining titles and improved access to mining data for government monitoring and potential private investors. Maintenance contracts and staff trained were in place.

- **Mining companies' compliance with environmental certification requirements.** Systematic environmental reporting was previously lacking. The Project helped achieve 70 percent compliance by closure. More importantly, a digital reporting system was introduced to monitor operator performance continuously, enhancing the sustainability of environmental management.
- **Mineral sector policy.** Before the Project, no formal mineral sector strategy existed. With Project support, a sector strategy was adopted by the Council of Ministers in November 2019, accompanied by a mining sector action plan which the Ministry of Mines continues to implement.
- **New geophysical data acquisition.** The Project funded a nationwide geophysical survey, significantly enhancing the country's ability to attract national and international investors. The data are publicly available on the ministry's website and expected to boost investor interest.
- **Mining inspection systems.** The Project supported improved environmental, production, and operational inspections across the country, leading to increased compliance. This contributed to steady growth in state revenues from mining, rising from 13.6 billion CFA in 2015 to 19.0 billion CFA in 2022 during Project life**.**
- **Education, training, and accountability.** The Project supported programs in geology and analytical chemistry at the University of Lome, with the first cohort of 22 students graduating in 2021. Additionally, over 3,000 nationals received training, and close to 3,000 people participated in six Accountability Platforms organized by the Project.

Rating. The efficacy rating under Objective 1 is Substantial. The expected results were largely achieved, with all PDO targets and most IRI targets met or exceeded. However, two important IRI targets were not met. The first – preparation of an investment plan for carbonated phosphates – was dropped following a change in Government priorities. The second - number of artisanal miners who are legally registered and formalized - was only partially achieved because it proved to be overambitious.

Rating
Substantial

OBJECTIVE 2
Objective
To strengthen the accountability of key organizations responsible for managing the mining sector.

Rationale
A Theory of Change (ToC) was not required at the time of PAD preparation and was only included later in the ICR (ICR, page 3). It listed the Project's activities, short-term outcomes, PDO outcomes, and long-term impacts. To achieve Objective 2, the Project supported E&S improvements and community development platforms. Key activities were: modernizing university geoscience programs, facilitating public access to mining information, creating platforms for accountability and dialogue, and undertaking an E&S assessment. Expected short-term outcomes were: operational accountability platforms, regular publication of mining statistics, systematic E&S inspections, and a community survey on environmental impacts. The expected PDO outcome was improved accountability of mining sector institutions. Enabling conditions (critical assumptions) were listed as: (i) integration of governance, transparency, and sustainability goals into

Government development planning, and (ii) realization of synergies with other ongoing initiatives. The ToC provided a sound rationale for Project implementation, a comprehensive presentation of the activities, and meaningful critical assumptions.

The RF indicators, as revised during Restructuring 1, were consistent with the PDO and expected outcomes under Objective 2. The RF included two PDO indicators - systematic publication of mining sector statistics on the government website, and operationalization of accountability platforms - and two IRIs: regular mining safety and environmental inspections, and annual implementation of a community perception survey on the environmental impact of mines. The RF indicators provided good coverage of the expected results. Both the PDO indicators and the IRIs were formulated at the intermediate outcome or output level, and IRIs mostly did not support the PDO indicators but rather measured separate results of comparable importance. Considering this was a TA project, such a design is acceptable.

IRI results:

1. “Mine safety and environmental inspections which are conducted based on systematic reporting and inspection procedures (Number)”. The indicator tracked the number of on-the-ground mine inspections conducted and reported using the modernized database. The baseline was zero, and the target was 10, while the achievement at closure was 38 inspections. The target was exceeded.

2. A perception survey of environmental impacts in impacted communities is conducted on an annual basis (Yes/No)”. The target was achieved, with the first survey conducted in 2017.

PDO outcomes:

1. "Systematic publication of mining sector statistics on government websites (Yes/No)". Expected result – publication of sector statistics covering production, export, and license data for the previous year – was achieved.

2. “Accountability platforms are operational at national and local level (Yes/No)”. Expected result - a functioning virtual forum of national and regional stakeholders – was achieved.

Overall, all four RF targets under Objective 2 were met or exceeded.

Key achievements included (ICR, pages 8-10):

- **Mining sector statistics on government websites**. Prior to the Project, no sector statistics were systematically available online. With the support of the Project, the MME launched a network of websites providing geological data, mineral license information, and sector statistics.
- **Accountability platforms**. The Project strengthened existing EITI forums and helped establish a national annual forum, which was replicated at the local level.
- **Legalizing ASM operations.** A total of 88 mining cooperatives were formed and registered with the Ministry of Land Management across three regions, enabling over 1,000 people to enter the formal workforce. However, by Project closure, these cooperatives had not yet received ASM mining permits.
- **Reduced environmental impact.** According to a Project-supported survey, the share of respondents who believed that the environmental impact of mining operations had increased from 5 percent of respondents in 2017 to 45 percent in 2021.

- **Organizational strengthening of MME.** The Project supported the preparation of MME's Strategic Plan for Sector Development (2019), adoption of an open data policy, and establishment of the Cadaster Management and Geodata Information Center. These initiatives improved public data access and transparency. The Project also supported organizational improvements within OTR, EITI, the Ministry of Finance and Planning, ANGE, tax authorities, and local administrations.
- **Local economic development.** The Project promoted job creation and formalization by supporting two new bachelor-level programs in geology and chemistry at the Faculty of Science. It also funded upgrades to labs and classrooms and built a digital learning center.
- **Environmental compliance**. A digital system for monitoring environmental and social compliance was developed and implemented, enabling automated oversight. Inspection and reporting roles were assigned to DGMG, ANGE, and local authorities. An environmental audit of SNPT led to the establishment of a division for occupational health, safety, and environmental compliance.

Rating. The rating is Substantial. While all RF targets were achieved or exceeded, the task of legalizing ASM operations was not fully accomplished, as the cooperatives had not yet received ASM mining permits by Project closure.

Rating
Substantial

OVERALL EFFICACY
Rationale
The rating is Substantial for both Objectives. All PDO indicator targets – covering the establishment of a digital cadaster management system, environmental compliance of mining companies, endorsement of the mineral sector policy, and the number of Project beneficiaries – were met or exceeded. Most IRI targets were also achieved or exceeded; however, one of the indicators (the development of the investment plan for phosphate deposits) was dropped due to a change in Government priorities, and another (the number of registered ASMs) was not fully achieved due to an unrealistic target.

Overall Efficacy Rating

Substantial

5. Efficiency
No economic analysis was conducted at appraisal or closure, as the Project focused on technical assistance, and such analysis was deemed not applicable. The ICR assessed efficiency based solely on administrative performance. However, the ICR reported notable improvements in mining sector outcomes during the Project life: from 2016 to 2022, annual government revenue from the mining sector rose by 43 percent, from US$21.4

million to US$30.7 million; production of key industrial minerals (phosphates, clinker, and cement) grew by 10 to 30 percent; and mining exports increased from US$181 million to US$332 million (PAD, pages 18; ICR, page 11). While the Project contributed to these positive trends, the extent if its attribution cannot be determined.

b. Administrative Efficiency:

The ICR highlighted that the Project was implemented within budget while achieving most of the targets, specifically for high-cost activities such as the geophysical survey and mine inspections. The Project benefited from thorough preparation, including high-level technical expertise and lessons from previous mineral sector operations in the region – in particular, the EI value chain approach, which combined regulatory reform with organizational and technical modernization, including digital data management and transparency. The design also built on a mining code review under the *Extractive Industries Technical Advisory Facility* (P146403) operation and a related five-year stakeholder dialogue. Risk analysis was thorough, with political, governance, fiduciary, and institutional capacity risks assessed as substantial and appropriately mitigated. Implementation arrangements were well-structured and inclusive of key government stakeholders. The World Bank team provided hands-on support, closely coordinating with the PIU and counterpart agencies, and identifying and addressing most challenges early. The Project benefited from fiduciary staff located in the country. The recruitment of in-country safeguards specialists, although half-way through implementation, was also helpful. Continuity was further supported by having a single task team leader with mining sector expertise throughout implementation. (ICR, pages 10-11, 13, 15-16)

However, the Project faced challenges, leading to an 18-month completion delay. The main factors were both external - the COVID-19 impact and the MME leadership change – and internal, such as a delayed establishment of the PIU, an overambitious design with vague PDO and RF; and procurement challenges. The 2020 reform replaced MME's senior leadership, placed it under the direct authority of the Presidency, and shifted its priorities, leading to a loss of institutional knowledge and cancellations or delays of some activities, such as the phosphate investment plan and mining code revision. Internally, delays included PIU operationalization 12 months after effectiveness, with initial gaps in mining and E&S expertise, and some key positions filled only mid-term or later. Staff turnover, including the Project Coordinator, affected continuity. The overambitious design - with nine subcomponents and need for coordination with multiple stakeholders (MME, OTR, ANGE, University of Lome, SNPT, and ASM operators) - added complexity. The original PDO and RF were vague, requiring a revision at MTR. Procurement and contracting were delayed due to the dual requirements -the World Bank's and national, - extensive national clearance processes, and poorly defined technical specifications, which slowed World Bank approvals. (ICR, pages 11-13)

On balance, considering the thorough preparation, hands-on supervision, strong stakeholder engagement, but also factoring in such factors of delays as prolonged PIU establishment and design overcomplexity, the efficiency rating is Substantial.

Efficiency Rating

Substantial

a. If available, enter the Economic Rate of Return (ERR) and/or Financial Rate of Return (FRR) at appraisal and the re-estimated value at evaluation:

	Rate Available?	Point value (%)	*Coverage/Scope (%)
Appraisal		0	0 ☐ Not Applicable
ICR Estimate		0	0 ☐ Not Applicable

* Refers to percent of total project cost for which ERR/FRR was calculated.

6. Outcome

The relevance of objectives is High, while both efficacy and efficiency are Substantial. Thus, the Overall Outcome is rated as Satisfactory.

a. Outcome Rating
Satisfactory

7. Risk to Development Outcome

Government ownership. Strong and sustained Government commitment during the first five years of implementation played a significant role in the Project's success. The Project benefited from extensive consultations with a broad range of stakeholders, including key government actors, and involved close coordination among relevant government agencies. Institutional arrangements were in place to ensure inter-ministerial coordination. At appraisal, it was acknowledged that reversing the perception of non-transparency in extractive industry transactions and addressing weak governance would be challenging. Nevertheless, the Government demonstrated strong commitment, having already begun applying provisions from the draft mining law and fiscal regime. However, following the 2020 replacement of MME's senior leadership, the MME's new reporting line directly to the Presidency, and a shift in government priorities in the mining sector - including the Presidency adopting a more direct participation in mineral investment promotion, government ownership and commitment to the original Project objectives became less clear, placing Project outcomes and the anticipated long-term impact at risk.

Financial. Fiscal constraints pose a risk to the sustainability of the new mining information systems financed by the Project, particularly regarding their operations and maintenance (O&M). To mitigate this risk, a service delivery fee was introduced, to be collected from licensed applicants and investors. Projections indicated that the resulting revenue would be sufficient to cover O&M costs as well as support additional functions such as mining inspections. However, the 2020 reform - which introduced changes to MME's senior leadership, shifted its reporting line to the Presidency, and redefined its strategic priorities - introduced uncertainty regarding financial sustainability. By Project closure, MME was effectively reliant on annual budget allocations, with no authority to collect fees independently. This situation poses a risk to the sustainability of O&M financing and, consequently, of Project outcomes. (ICR, page 16)

Institutional capacity. The Project contributed to strengthening key government institutions by enhancing technical capacity and improving organizational structures. However, implementation faced challenges due

to limited human resources, both at the level of technical experts and project management staff. To address this, the Project adopted a proactive recruitment and training strategy, focusing on recent university graduates. By Project closure, MME had successfully recruited over ten staff members from the cohort of interns initially hired under the Project.

8. Assessment of Bank Performance

a. Quality-at-Entry

The Project was thoroughly prepared, drawing on high-level expertise and incorporating lessons from previous mineral sector operations in the region. It adopted successful approaches - such as the Extractive Industries (EI) value chain model, - built on the *Extractive Industries Technical Advisory Facility* (P146403) operation, and engaged in stakeholder consultations. Although complex, the Project relied on a comprehensive risk assessment, with mitigated political, governance, fiduciary, and institutional capacity risks. Implementation arrangements were robust. However, shortcomings are noted. The design was overambitious, given the institutional capacity, involving a significant number of tasks and extensive coordination among many stakeholders, including MME, OTR, ANGE, University of Lome, SNPT, and ASM operators. Another shortcoming was the vagueness of the original PDO and RF indicators, requiring revisions during the MTR. (ICR, pages 9, 15)

Quality-at-Entry Rating

Moderately Satisfactory

b. Quality of supervision

The ICR noted that the Bank team provided hands-on support, working with the PIU and counterpart agencies to identify and address issues as they arose. The World Bank conducted 12 supervision missions over six years, complemented by biweekly or monthly meetings, maintaining strong collaboration with the client. Implementation progress was reported regularly, through ISRs, aide-mémoires, and biannual updates to the Government Steering Committee. Fiduciary arrangements were solid, supported by the in-country staff. Safeguards and fiduciary supervision were adequate and frequent, with a multidisciplinary team—many based locally—providing detailed reporting. A single team leader throughout implementation ensured continuity. The Bank team remained proactive and flexible, restructuring the Project twice to align with evolving sector priorities and implementation realities. (ICR, pages 11-13, 15-16)

The Project faced several external and internal challenges, which were adequately addressed. Externally, the COVID-19 pandemic and a leadership change at MME in 2020 shifted sector priorities, resulting in loss of institutional knowledge and delays or cancellations of activities such as the phosphate investment plan and mining code revision. Internally, the PIU became operational 12 months after effectiveness, with early gaps in mining and E&S expertise, and key positions filled only mid-way through implementation. Staff turnover, including the Project Coordinator, affected continuity. Procurement and contracting were delayed

by dual World Bank and national requirements, lengthy clearance processes, and poorly defined technical specifications, which slowed approvals. (ICR, pages 11-13)

Overall, the Bank performance is rated as Satisfactory. The design was strong, with some shortcomings, and while the implementation experienced challenges, they were mitigated through restructurings.

Quality of Supervision Rating
Satisfactory

Overall Bank Performance Rating
Satisfactory

9. M&E Design, Implementation, & Utilization

a. M&E Design
The RF at design reflected the logic of the Project's interventions outlined in the PAD and was sufficiently aligned with the PDO and expected outcomes. It measured objective results using a mix of quantitative, binary (Yes/No), and qualitative indicators that were time-bound, measurable, and attributable to the Project. All PDO indicators and most IRIs were defined at the intermediate outcome level, with some IRIs at the output level. The IRIs did not support the PDO indicators, they monitored separate results, whereas the PDO indicators captured the key results. Such design is appropriate for a TA project.

However, there were some shortcomings in RF design. Both the original PDO statement and some of the original RF indicators were vaguely formulated and were later re-phrased during Restructuring 1 in November 2019 to improve clarity and measurability. For example, the main PDO indicator – *Modernized cadaster, GIS, and geological database developed, functional, and accessible* – combined three distinct systems into a single indicator, making monitoring difficult. It was subsequently broken down to separately track the development and accessibility of each system. Another example is the replacement of the original indicator *Consistent implementation of recommendation for modernization derived from the institutional assessments* with the more specific, focused, and clear *A mineral sector policy is endorsed and its implementation plan is systematically monitored*. Also, while overall coverage of expected results by the RF was adequate, some important areas – such as the revision of the legal framework and institutional restructuring - were not sufficiently captured. (ICR, pages 8-9, 13-14)

b. M&E Implementation
The ICR noted that M&E implementation was generally adequate. The PIU was responsible for regularly monitoring and evaluating progress toward target achievement. M&E data were collected and analyzed in line with the design, in collaboration with the implementing agency and consultancies engaged for this purpose - including those responsible for conducting the environmental impact perception survey in mining communities. As a result, impact monitoring was effectively integrated into Project implementation. No significant issues with M&E processes were reported. (ICR, page 14)

c. M&E Utilization

The ICR reported that the M&E data and analysis effectively supported the Implementation Status Reports (ISRs) and were utilized to inform Project management and senior-level decision-makers on the progress of activities. Notably, M&E findings helped guide the restructuring process by shifting focus from stagnant activities to more promising ones and informed budget allocation accordingly. (ICR, page 16)

The M&E Quality is rated as Substantial. While the initial design had some shortcomings, these were addressed during Restructuring 1. M&E implementation and utilization throughout the Project were deemed adequate and supported adaptive management.

M&E Quality Rating

Substantial

10. Other Issues

a. Safeguards

Environmental and Social (E&S) Safeguards. At appraisal, the Project was classified as Environmental Category B (Partial Assessment), triggering the Environmental and Social Assessment policy (OP/BP 4.01). As required, a Strategic Environmental and Social Assessment (SESA) of the national mining sector was prepared and publicly disclosed within 24 months of the Project's effectiveness date. The SESA was integrated into the national sector strategy and informed relevant Project activities, including: (i) the development of a nationally endorsed resettlement framework and grievance mechanism for the mining sector, and (ii) the preparation of environmental and social guidelines for small- and medium-scale mining operations. The Project also established and maintained a grievance redress mechanism to manage complaints. Grievances received were related primarily to procurement issues, particularly in the evaluation and award of consultancy contracts, and were resolved satisfactory. The Project received a Satisfactory rating for overall safeguards performance in the last six ISRs, including in the final one. (ICR, page 14)

b. Fiduciary Compliance

Financial management (FM). The ICR reported that financial management performance was strong throughout implementation. The Project's financial management system functioned effectively, and the residual financial management risk was rated as moderate. Project accounts were adequately maintained, with no major outstanding FM issues noted in interim financial reports or audits for the project. FM performance was rated Satisfactory in the last six ISRs, including the final one. (ICR, page 17)

Procurement. Although the Project had a disbursement of 99.74 percent at closure, it faced procurement and disbursement challenges that led to implementation delays and contributed to the need for an 18-

month extension of the closing date. Procurement and contracting were hindered by dual requirements - those of the World Bank and the national system - along with lengthy national clearance procedures and poorly defined technical specifications, which slowed World Bank approvals. Complaints were received regarding procurement procedures and the evaluation of technical and financial proposals for a few activities, which caused additional delays; however, these complaints were ultimately dismissed. Procurement performance was rated Moderately Satisfactory in the last six ISRs, including the final rating. (ICR, page 17)

c. Unintended impacts (Positive or Negative)

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d. Other

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11. Ratings

Ratings	ICR	IEG	Reason for Disagreements/Comment
Outcome	Satisfactory	Satisfactory	
Bank Performance	Satisfactory	Satisfactory	
Quality of M&E	Substantial	Substantial	
Quality of ICR	---	High	

12. Lessons

The following lessons were derived from the ICR (ICR, pages 16-17):

1. An established and clear set of national sector policy priorities and strategy prior to project effectiveness is critical for mining sector TA operations. In the Project under review, a well-defined vision for sector policy transformation was absent at the time of effectiveness. The mining sector strategy, supported by the project and launched in 2018 - two years after effectiveness - played a key role in accelerating the policy dialogue. This dialogue contributed to: (i) institutional and organizational reforms within the DGMG; (ii) accelerated recruitment and capacity building across sector agencies; and (iii) a mid-term restructuring of the project design. Project implementation could have been more efficient and timely had a strategic vision been articulated from the outset.

2. Regional collaboration is key to addressing the complex cross-border challenges posed by ASM in the Sahel region. Given the transboundary nature of (often illegal) ASM operations—including in countries neighboring Togo, such as Ghana and Côte d'Ivoire—coordinated regional responses are critical. Acknowledging this, the Project integrated a regional dimension into its activities. This included developing new curricula at the Faculty of Science in Lomé and establishing

partnerships and exchange programs with peer institutions, such as the Schools of Mines in Niger and Burkina Faso. The academic support also leveraged lessons from the World Bank–supported Africa Centers of Excellence program, implemented through several multi-phase programmatic approaches across Africa. Future mining sector TA operations on the continent could build on these foundations and extend such regional collaboration to other areas of client support.

3. Stakeholder engagement through regular Accountability Forums and annual stakeholder perception surveys are effective mechanisms for ensuring citizen participation and building ownership across diverse constituencies in the mining sector. The Project demonstrated that these forums serve as effective tools for promoting meaningful citizen participation and could be replicated in future projects. Feedback from these consultations informed key adjustments to Project design, as well as adaptive measures during the MTR. In addition, reports from communities affected by mining activities were instrumental in prioritizing mine inspections and strengthening compliance monitoring.

13. Assessment Recommended?

No

14. Comments on Quality of ICR

The ICR is logical, well-structured, technical, analytical, and internally consistent. All main sections – including the relevance of objectives, efficacy, efficiency, factors influencing Project performance, restructurings, safeguards compliance, risks, and lessons learned - are clearly presented and supported by adequate and sufficient evidence. The lessons learned are well connected to the analysis and ratings, and are particularly relevant to TA projects operating in similar political economy contexts. The ICR also candidly acknowledges the Project's shortcomings. The ICR report meets the OPCS requirements. The ICR quality is rated as High.

a. Quality of ICR Rating
High