

Implementation of Low-Carbon and Climate-Resilient Transport Solutions in Togo

Review PIF and Make a recommendation

Basic project information

GEF ID
11577
Countries
Togo
Project Name
Implementation of Low-Carbon and Climate-Resilient Transport Solutions in Togo
Agencies
BOAD
Date received by PM
3/22/2024
Review completed by PM
6/16/2025
Program Manager
Jason Spensley
Focal Area
Climate Change
Project Type
FSP

GEF-8 PROJECT IDENTIFICATION FORM (PIF) REVIEW SHEET

1. General Project Information / Eligibility

a) Does the project meet the criteria for eligibility for GEF funding?

b) Is the General Project Information table correctly populated?

Secretariat's Comments

30 Sept 2025:

Cleared

8 Sept 2025:

We notice that in the LDCF Meta Information on page 67, the box for the Challenge Program for Adaptation Innovation is selected as "true". Please change this to "false" or simply uncheck it.

Explain the methodological approach and underlying logic to justify target levels for Core and Sub-Indicators (max. 250 words, approximately 1/2 page)

META INFORMATION - LDCF		
LDCF	<input checked="" type="checkbox"/>	SCD-B (Window B) on co/financing transfer
	<input type="checkbox"/>	SCD-A (Window A) on climate Change activities
Is this project LDCF NEX Challenge program?		
	<input checked="" type="checkbox"/>	

16 June 2025:

As agreed during in-person discussions with the OFP of Togo and BOAD on the margins of the GEF Council meetings from June 2-6, 2025, in order to be more directly eligible for GEF LDCF and Trust Fund finance, it is important for this project to focus more directly and fully on climate adaptation and GHG emission reductions in the capital city of Lom?. As such, it will be important to remove reference to 100 housing units and bus lines in Kpom?.

26 March 2024:

Ai) We are sorry to have to reply that unfortunately not. This PIF was received in the GEF Portal after the deadline of March 20th, 2024, and therefore cannot be considered for the June 2024 Work Program. This PIF was received on March 21, 2024. Therefore, this project can only be considered for the December 2024.

Aii) Please see the set of comments below. We suggest a substantial reformulation of this PIF before it is resubmitted.

The integration of low carbon and climate resilience solutions is very well applied in cities which are both contributors to high GHG emissions as well as highly vulnerable to climate extremes. In this context, the project looks interesting but lacks a strong design to deliver large scale climate change adaptation and mitigation benefits using the LDCF and CCM STAR.

Strengths: The overall approach of supporting urban planning and enabling conditions including financial planning along with technical capacity building and investment in low carbon resilient solutions looks comprehensive and well thought. There is also a significant co-financing which could lead to large scale impact. There is also general thematic alignment with adaptation strategy as the project focuses on early warning

systems and climate resilient infrastructure.

Gaps: There are notable design challenges with the project. It presents the challenge of urban sprawl and puts forward the idea of density to reduce GHG emissions and improved resilience. However, it supports creation of a satellite city beyond the capital city which may lead to eventual sprawl in absence of any notable investments and technical assistance in the capital city itself to build low carbon and resilient infrastructure and apply measures that can reduce sprawl. Therefore, there is a general lack of alignment between the project context and the objective which focuses narrowly on a new site with 20000 houses. While the new satellite city may be necessary given the rising population and migration to cities, the project would be more effective if it focuses more on the challenges of Lome and use the new area Kpome for some strategic activities such as land use planning which can consider urban sprawl and climate vulnerability challenges. Overall, the project of this scale should broaden the scope to include the capital city rather than investing only in a new site/estate.

In addition to the full set of specific comments below, general recommendations include:

- (i)- Revise the project design with stronger focus on Lome with some technical support to the new region using a more integrated urban landscape approach.
- (ii) The component 1 interventions are fine but would be useful if it focuses on both the capital and the new area more holistically.
- (iii) Component 2 needs significant revision to align with CCM objectives. The CCA also isn't recommended for investment in construction of houses and roads. The resources should be used in a more catalytic manner. Only a few pilots can be supported. The co-financing can make the main investments. In component 2, the project is recommended to include nature based solutions.
- (iv) Component 3 is not very clear. Needs more details. Focus on exploring innovative financing and private sector engagement is recommended.
- (v) Component 4 is also not clearly articulated. It needs to be anchored strongly at the national level to ensure that the learnings from the project can inform urban sustainability in other cities in the country.

B) Yes

Agency's Comments

Agency's Response from June 16 2025

The updated PIF squarely meets GEF eligibility requirements **because every dollar of the LDCF and GEF-Trust-Fund request now finances climate-adaptation and GHG-mitigation measures inside Lom?, the capital city?**exactly as agreed during our June 2025 Council-week discussion with the OFP and BOAD.

- ? **Exclusive Lom? focus.** All references to the Kpom? satellite city?including the 100 housing units and inter-city bus links?have been removed. The grant is now devoted to:
 - o **10?15 km of nature-based drainage corridors and 30 ha lagoon-wetland restoration** that lower flood depth and frequency for ? 45 000 residents.
 - o **City-wide climate-smart building and land-use ordinances** that mandate 0.8 m freeboard, ? 30 % permeable surface, cool roofs and PV-ready wiring.
 - o **Five zero-emission BRT / NMT corridors and an e-moto swap-out**, reducing transport emissions by ~560 000 t CO?e over 20 years.

- o A **US \$ 10 million partial-credit-guarantee facility** that channels private finance into these Lomé pipelines, with 30 % of loan volume reserved for women-led enterprises.
- ? **Adaptation eligibility.** Because Togo is an LDC, the LDCF window squarely supports the project's primary objective of **flood-risk reduction** through NbS drainage, elevated-foundation codes and early-warning integration.
- ? **Mitigation eligibility.** The GEF Trust Fund's Climate-Change Mitigation window supports the complementary **GHG-reduction measures**: cool-roof / energy-efficiency retrofits and the shift to electric mass-transit.
- ? **Consistent project data.** The General Project Information table reflects this scope: grant = US \$ 9.321 m, agency fee = US \$ 0.837 m, PPG = US \$ 0.200 m; executing entity is the Ministry of Road, Air & Rail Transport, which leads all Lomé-based works.

In short, the PIF now **focuses fully and demonstrably on climate adaptation and GHG-emission reduction in Lomé**, with no residual activities outside the capital.

Agency's Response from September 8 2025

The **Challenge Program for Adaptation Innovation** field in **LDCF Meta Information** is now set to **False** in the GEF Portal.

2. Project Summary

Does the project summary concisely describe the problem to be addressed, the project objective and the strategies to deliver the GEBs or adaptation benefits and other key expected results?

Secretariat's Comments

30 Sept 2025:

Cleared

9 September 2025:

1. Cleared

2. Please revise the "Project Objective" on pages 4 and 5 to be 1 to 2 sentences, which concisely indicates the main objective of the project. If BOAD desires, the much longer paragraph currently indicates as the project objective can be retained, but this section needs to start with a 1 or maximum 2 sentence statement that indicates the project objective.

16 June 2025

1. As agreed during in-person discussions with the OFP of Togo and BOAD on the margins of the GEF Council meetings from June 2-6, 2025, , it is important for this project to focus more directly and fully on climate adaptation and GHG emission reductions in the capital city of Lomé. Please revise accordingly, including:

a) As such, it will be important to remove reference to 100 housing units and bus lines in Kpom.

b) The focus articulated within Lomé is appreciated, including updating of building codes and land use regulations to integrate flood risk and low carbon standards, improve coordination among key ministries, retrofit roads and drainage systems using NbS in Lomé. Innovative financing instruments, including partial credit guarantees to enable micro, small, and medium enterprise development in Lomé for climate adaptation and mitigation benefits is also compelling.

c) Given the elimination of the activities in Kpom? and the bus lanes to get to Kpom?, please expand climate adaptation and mitigation activities and impacts in Lom? accordingly. Please revise the project summary and project objective; as well as the section of project components, outcomes and outputs, and all other relevant sections, as such.

2. Project objective in portal is not concise as expected. Instead, it looks like a summary. Please amend.

26 March 2024:

As it is currently designed, this project is likely to have little positive impact on climate adaptation impact. A significant reformulation would be required for this to be eligible for GEF finance from the LDCF and climate change mitigation results area of the Trust Fund. For example, the following points would need to be fully addressed for this project to be eligible for GEF support:

B) The project indicates that the current and rapidly growing population of Lom? is suffering from a favourable policy framework for low carbon and climate resilience, and weakness of capacities for planning, implementation and monitoring of solutions of sustainable urban growth at all levels. As this project is currently designed, the solution to these serious problems in Lom? appears to be to build a satellite city elsewhere, rather than improve the situation in Lom? itself. If this is correct, this raises important concerns that would have to be addressed for this project to be eligible for GEF finance. For example:

B) It is important that the project be designed to ensure the already limited policy making, planning, and monitoring capacity that is stated in the PIF to be already limited for the capital of Lom? will not be further stretched and diverted away in order to focus on a new area of the not yet built Kpom?. How will this be achieved?

C) It will be important to ensure the project also directly benefits the limited policy environments, and well as planning and monitoring capacities in the existing cities where the urban population of Togo are living, and not only a future city where people are not yet living.

D) In several sections, the PIF generally refers to resilient cities and new cities in the plural form. However, the project outcomes and outputs seem to only refer to impacting one (not yet built) city (Kpom?). Please clarify. Given the stated needs of the country, and particularly the needs of the capital city and other small cities of Togo, it is crucial that the project is redesigned to benefit more of the country, including in cities where people are already living and that are expected to continue to grow.

E) How will the integration of vulnerability risk assessments benefit the urban populations where people currently live in Togo?

F) We note the project states that it will be an example at the national level. How will this be achieved, and how will it benefit the current greatest urban centres of Togo?

G) We note that the project will initiate a paradigm shift and transformational vision for the country towards resilient and low carbon development. How will this be achieved and how will it improve climate resilience and lower carbon emissions in the country's current largest urban centres?

Agency's Comments

Agency's Response from September 9 2025

We have revised the **Project Objective** to open with a concise 2-sentence statement, per guidance. The same 2-sentence objective is now reflected in the Indicative Project Overview and in the Portal Objective field.

Agency's Response from June 16 2025

The updated PIF now channels **100 % of the GEF/LDCF grant (US \$ 9.32 m)** to a single, Lom?-centered package that:

1. **Locks-in climate norms city-wide** ? three to five ordinances and a digital e-permitting platform make 0.8 m flood-freeboard, ? 30 % permeable surface, cool-roof/insulation standards and PV-ready wiring compulsory in **all five arrondissements**.
2. **Delivers visible, on-the-ground assets** ?
 - o **10?15 km of nature-based drainage corridors** plus 30 ha of restored lagoon fringe protect ~45 000 residents and 320 ha of urban land.
 - o **Five zero-emission BRT/NMT corridors** and an **e-moto swap-out for ~1 000 taxi riders** cut local PM ?? and avoid ~560 000 t CO?-e over 20 years.
 - o **? 100 climate-smart housing retrofits** (phased 35 + 35 + 30; floor ? 75 units if costs rise) put the new code into practice and reserve at least 40 units for female-headed households.
3. **Mobilizes private finance at scale** ? a **US \$ 10 m Partial-Credit-Guarantee Facility (PCGF)**, seeded with a US \$ 2.5 m first-loss tranche and backed by ? **US \$ 37 m** in BOAD, AfDB and IFC credit lines, drives lending to NbS contractors, e-bus suppliers, retrofit builders and the e-moto fleet; **? 30 % of guarantee volume is ring-fenced for women-led firms**.
4. **Spreads knowledge beyond the capital** ? an open-access, bilingual **National Urban-Climate Knowledge Hub** plus peer-city mini-grants take Lom??s drawings, BoQs, gender-lens templates and PCGF playbook to at least 60 other municipalities.

Result: a coherent adaptation-and-mitigation engine that hard-wires flood resilience and low-carbon growth into Lom??s planning, finances the shift with private capital, ensures gender equity throughout, and packages everything for rapid national replication. With every Kpom? activity removed and all figures, safeguards and gender actions realigned, the project now squarely meets the eligibility and focus criteria set by the Secretariat.

3 Indicative Project Overview

- 3.1 a) Is the project objective presented as a concise statement and clear?
- b) Are the components, outcomes and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?

Secretariat's Comments

30 Sept 2025:

Cleared

8 September 2025:

The responses and corresponding revisions to the project are appreciated.

Regarding the comments and responses below on Component 3, we welcome the increased focus and articulation in the innovative and sustainable finance mechanism. Please briefly outline how private sector and/or other investors will be motivated and cultivated to provide senior risk sharing capital of \$7.9 million.

Additionally, during project preparation, it will be important to elaborate on design and the partners, including potential public and private sector investors, and the design of the guarantee.

16 June 2025:

(i) Output 1.1 "Update/revise 3-5 building codes and land-use regulations: Please expand the outcome description between only improved inter-ministerial coordination, to include for example direct increased climate adaptation for the local population, reduced emissions from certain activities and energy efficiency of buildings, etc.

(ii) Outcome 1.1: Please ensure the policy and regulatory work is carried out across all districts of Lomé. We note 2-3 districts only is mentioned in a couple of places in the document and we suggest expanding this to all relevant districts of Lomé.

(iii) Output 1.3: "Policy incentives for ~50 private developers to adopt resilient, low carbon designs": Why would incentives be created for only ~ developers, rather than creating incentives for ALL developers? Or is the number 50 meant to refer to the number of developers who are anticipated to take advantage of the incentives that are created for all? Please revise. How many of all the developers are anticipated to take advantage of the incentives?

(iv.a) Component 3. "Innovative financing, private sector engagement, and capacity building": This focus is appreciated and welcomed, including for creation of a partial credit guarantee or a revolving fund. However, the scale of finance allocated to this seems quite limited and suggests that this will only be to design such instruments, but not to actually provide the guarantee or capitalize the revolving fund. If so, how will the guarantee or revolving fund be financed? Also, a guarantee and a revolving fund are of course very different, so it is important to specify which is foreseen. Please clarify.

(iv.b) Further, please strengthen how the creation of a partial credit guarantee or revolving fund is integrated with the rest of the project. For example what underlying drivers are creating the need for this; what are the capacity challenges and opportunities to do so; who will be the partners; where will the capital come from; how will this catalyze greater action by MSMEs; how is this integrated in the Theory of Change; etc?

(v) Component 4: "Knowledge management, M&E, and sustainability": We encourage this component to include knowledge sharing from the direct activities in Lomé with other (secondary) cities throughout Togo, including but not limited to Kpémé. Please revise.

(v) We note that Figure 2 on projected precipitation variability appears to illustrate that there is not a significant increase anticipated. Given this, what is anticipated to be the increased incidence of flooding. Sea level rise? Please clarify and substantively expand articulation of the flooding problem in this section to be addressed by this project, including its relationship to climate change, and how project activities will address this problem. In doing so, we suggest to seek other references anticipated precipitation change, and include references to sea level rise, to enable a reasonably robust analysis of anticipated climate related flooding in Lomé.

(vi) Please amend the indicative project overview table by including only once Components ? Outcomes -Outputs and as appropriate. With the current presentation, it is not easy to follow the content.

Project Components	Component Type	Project Outcomes	Project Outputs	Trust Fund	GEF Project Financing(\$)	Co-financing(\$)
1. Strengthening Policy & Institutional Frameworks (~19% of total GEF)	Technical Assistance	Streamlined integration of flood risk/ Early Warning System (EWS) & low-carbon standards in urban planning Lomé & Kpomé	1.1. Update/revise 3-5 building codes & land-use regulations (energy efficiency, flood resilience)	GET	240,000.00	2,210,000.00
1. Strengthening Policy & Institutional Frameworks (~19% of total GEF)	Technical Assistance	Streamlined integration of flood risk/ Early Warning System (EWS) & low-carbon standards in urban planning Lomé & Kpomé	1.1 Update/revise 3-5 building codes & land-use regulations (energy efficiency, flood resilience)	LDCF	300,000.00	3,790,000.00
1. Strengthening Policy & Institutional Frameworks (~19% of total GEF)	Technical Assistance	Improved inter-ministerial coordination for climate-smart urban development	1.2 Inter-Ministerial Committee meets ≥4x/year, involving ~2,000 staff	GET	240,000.00	2,210,000.00
1. Strengthening Policy & Institutional Frameworks (~19% of total GEF)	Technical Assistance	Improved inter-ministerial coordination for climate-smart urban development	1.2 Inter-Ministerial Committee meets ≥4x/year, involving ~2,000 staff	LDCF	300,000.00	3,790,000.00
1. Strengthening Policy & Institutional Frameworks (~19% of total GEF)	Technical Assistance	Improved inter-ministerial coordination for climate-smart urban development	1.3 Policy incentives for ~50 private developers to adopt resilient, low-carbon designs	GET	160,000.00	1,470,000.00
1. Strengthening Policy & Institutional Frameworks (~19% of total GEF)	Technical Assistance	Improved inter-ministerial coordination for climate-smart urban development	1.3 Policy incentives for ~50 private developers to adopt resilient, low-carbon designs	LDCF	200,000.00	2,530,000.00
2. On-the-Ground Resilient & Low-Carbon Solutions (~48% of total GEF)	Investment	Reduced flood vulnerability for ~20,000 residents in Lomé's flood-prone districts + pilot in Kpomé	2.1 Retrofit ~10-15 km of roads/drainage with nature-based solutions in 2-3 Lomé districts	GET	674,000.00	8,760,000.00
2. On-the-Ground Resilient & Low-Carbon Solutions (~48% of total GEF)	Investment	Reduced flood vulnerability for ~20,000 residents in Lomé's flood-prone districts + pilot in Kpomé	2.1 Retrofit ~10-15 km of roads/drainage with nature-based solutions in 2-3 Lomé districts	LDCF	900,000.00	12,040,000.00
2. On-the-Ground Resilient & Low-Carbon Solutions (~48% of total GEF)	Investment	- GHG mitigation of ~638,775 tCO ₂ (over 20 years) via green buildings, improved mobility, and Nature Based Solution (NBS)	2.2 Pilot ~100 resilient, low-carbon housing units in Kpomé (private co-financing)	GET	500,000.00	6,560,000.00
2. On-the-Ground Resilient & Low-Carbon Solutions (~48% of total GEF)	Investment	- GHG mitigation of ~638,775 tCO ₂ (over 20 years) via green buildings, improved mobility, and Nature Based Solution (NBS)	2.2 Pilot ~100 resilient, low-carbon housing units in Kpomé (private co-financing)	LDCF	800,000.00	9,040,000.00
2. On-the-Ground Resilient & Low-Carbon Solutions (~48% of total GEF)	Investment	- GHG mitigation of ~638,775 tCO ₂ (over 20 years) via green buildings, improved mobility, and Nature Based Solution (NBS)	2.3 Introduce ~5 bus lines & Non-Motorized Transport (NMT) corridors, targeting ≥30,000 monthly riders	GET	500,000.00	6,560,000.00
2. On-the-Ground Resilient & Low-Carbon Solutions (~48% of total GEF)	Investment	- GHG mitigation of ~638,775 tCO ₂ (over 20 years) via green buildings, improved mobility, and Nature Based Solution (NBS)	2.3 Introduce ~5 bus lines & Non-Motorized Transport (NMT) corridors, targeting ≥30,000 monthly riders	LDCF	800,000.00	9,040,000.00
3. Innovative Financing, Private Sector Engagement & Capacity Building (~24% of total GEF)	Technical Assistance	- Financing mechanisms to scale climate-smart infrastructure	3.1 Establish partial credit guarantees or a revolving fund mobilizing ~US\$ 10-15M from local banks	GET	260,000.00	1,610,000.00
3. Innovative Financing, Private Sector Engagement & Capacity Building (~24% of total GEF)	Technical Assistance	- Financing mechanisms to scale climate-smart infrastructure	3.1 Establish partial credit guarantees or a revolving fund mobilizing ~US\$ 10-15M from local banks	LDCF	340,000.00	2,140,000.00

(vii) Monitoring and Evaluation is included in component 4, but it must be included as a stand-alone component with outputs and outcomes (see green rectangles below). Also, there is not proportionality in the co-financing contribution to PMC. If the GEF contribution is kept at 5%, for a co-financing of \$88,000,000 the expected contribution to PMC must be around \$4,400,000 instead of \$3,750,000 (which is 4.2%). As the costs associated with the project management must be covered by the GEF portion and the co-financing portion allocated to the PMC, the GEF contribution and the co-financing contribution must be proportional, which means that the GEF contribution to PMC might be decreased and the co-financing contribution to PMC might be increased to reach a similar level. Please ask the Agency to amend either by increasing the co-financing portion and/or by reducing the GEF portion. A more definitive estimation of PMC will be presented and adjusted at CEO Endorsement stage.

24 March 2024:

- i) Please outline outcomes, as well as outputs.
- ii) Component 1: Please specify how the set outputs of this outcome will directly benefit existing growing urban populations of Togo, particularly Lom?.
- iii) Output 1.1: How specifically will the project improve Togo's EWS?
- iv) Output 1.2: Please consider how this output can do more than simply run training sessions, towards designing and implementing solutions.
- v) Output 1.3: We note the PIF indicates this output "will select the adaptation and mitigation options to be included". Please note it is important to identify the adaptation and solutions options prior to starting the project, and having a good sense of what they will be in the PIF. Otherwise, it is not possible to assess whether the project will generate the intended impacts.
- vi) Output 1.4: Please expand. For example, what financial mechanism will be developed; who will the proposal be for; how will it be finance?
- vii) Component 2: Importantly, how will this project reduce the significant risk of the new Kpom? project not being built in a timely manner, which has been known to occur in several cases with ambitious projects of this nature?
- viii) Component 2: Given the increased value of houses built that are climate resilient, please consider how this added value can be covered or cost shared with private sector investors in the housing projects, so limited public and grant resources can be used for other hard to pay for activities.
- ix) Component 2: Please consider and explain how low emissions and climate resilience transportation from the planned satellite city of Kpom? to places of current employment in Lom? will be achieved. This is extremely important to not increase emissions and result in maladaptation as a result of this component. if this is not possible to achieve, please consider focusing the project on existing population centre(s).
- x) Component 3: How does this component differ from output 1.2? As indicated in output 1.2, please ensure this component makes a greater contribution than simply building skills, and results in implementation of specific climate adaptation and mitigation actions that are indicated in the PIF and CER.

Agency's Comments

Agency's Response from September 8 2025

Senior risk-sharing capital of ? US\$7.9m will be motivated by:

- ? De-risked pipeline: Lom??s e-permitting system auto-forwards code-compliant projects into BOAD?s PCGF ?deal room,? reducing origination frictions and ensuring steady deal flow.
- ? Attractive risk stack: ? US\$2.5m first-loss (BOAD/FOGAR-Climat) + ? US\$7.9m senior risk-sharing (BOAD US\$6.1m + one domestic bank ? US\$1.8m) ? ? US\$10m guarantee window that mobilizes ? US\$37m in parallel lending.
- ? Capacity & visibility: Training ? 300 bankers/developers/SMEs (? 30% women) and quarterly, sex-disaggregated dashboards; ? 30% of guaranteed volume for women-led firms with a 20% carve-out.
- ? Time-bound commitments: Draft term sheets within six months of PPG; commitment letters annexed at CEO Endorsement.
- ? Sustainability: A Year-5 Transition Pact for ? 2 banks to recapitalize ? US\$5m of first-loss from their own balance sheets.

During project preparation, we will finalize instrument design and partners: the PCGF hosted in BOAD?s FOGAR-Climat, confirm the domestic partner bank, and settle term-sheet parameters (coverage %, fees/tenors, caps, call process, MIS, governance). Parallel lines (BOAD/AfDB/IFC) will be confirmed per the co-financing table.

vi) Agency's Response from September 8 2025

The **Indicative Project Overview** has been streamlined to present **each Component once** with a single **Outcome** block and **distinct, non-duplicated Outputs**. The table now shows **Components 1?5** (with **MEL as Component 5**) and the **Subtotal updated to ?Comp 1?5.?** This resolves the prior readability issue created by roll-ups/duplication (e.g., former ?3.4?3.6? lines).

vii) Agency's Response from September 8 2025

- (i) **Monitoring, Evaluation & Learning (MEL)** is now a **stand-alone Component 5** with its own **Outcome/Outputs**(MEL plan & RF; integrated dashboard with NDC/LDCF interface; **Midterm Review; Terminal Evaluation**). **Component 4** is retitled **?Knowledge Management & Sustainability?** and excludes M&E.
- (ii) **GEF PMC ? 5% (US\$0.47 m)** is maintained, and a **PMC co-financing tag ? 5%** of the confirmed co-finance is designated (**US\$2.80 m on a US\$56.0 m baseline**) from Government/Municipal in-kind and BOAD secondments. These are **presentation/reclassification** updates; **grand totals remain unchanged** and will be finalized at CEO Endorsement.

(i) Output 1.1; (ii) Outcome 1.1; (iii) Output 1.3 : Agency's Response from June 16 20025

Secretariat request (16 June 2025)	How the 29 July 2025 PIF now addresses it	Key evidence in the revised PIF*
(i) Output 1.1 ? outcome description too narrow; show direct adaptation, mitigation and energy-efficiency gains, not just better coordination.	? Outcome paragraph rewritten to spell out the concrete performance targets embedded in the new ordinances: 0.8 m freeboard + ? 30 % permeable surface + mandatory EWS zoning + cool-roof SRI ? 78, R-2.5 insulation and PV-ready conduit.? Quantified benefits now appear directly in the outcome line: ? Adaptation: shields ? 45 000 Lom? residents from 1-in-10-year flood losses. ? Mitigation: avoids ? 63 000 t CO?e over 20 years. ? Efficiency: saves ? 15 GWh electricity (2026-2046).	Component 1 narrative & outcomes box, pp 28-31

Secretariat request (16 June 2025)	How the 29 July 2025 PIF now addresses it	Key evidence in the revised PIF*
(ii) Outcome 1.1 ? confirm that regulatory work covers <i>all</i> districts of Lom?, not only 2?3.	? The coverage line now reads: ?Regulations and the digital e-permitting platform are rolled out across all five Lom? arrondissements; no district is exempt. ? Same wording appears in the Inter-Ministerial Committee TOR and in the Core Indicator notes.	Digital-permitting subsection, p 30
(iii) Output 1.3 ? ?~50 developers? unclear; incentives should apply market-wide. How many developers are actually expected to use them?	? Text clarified: incentives (fast-track permits, tax rebate, ?Lom? Climate-Smart? label) are open to every licensed developer (~120 firms).? Market sounding shows ~40 % of firms (? 50 developers) are likely adopters within five years; ?50? is now clearly described as an <i>uptake target, not a cap.</i>	Output 1.3 paragraph, p 30

Integration with the overall theory of change

Updating the ordinances city-wide (Output 1.1) and offering market-wide incentives (Output 1.3) lock climate-smart standards into every building permit, automatically feeding **code-compliant projects into the Partial-Credit-Guarantee Facility (PCGF)** described under Component 3. This ensures that:

1. **Adaptation & mitigation benefits are city-wide** rather than confined to a few pilot districts.
2. **Private developers?large and small?have both regulatory clarity and financial backing** to adopt resilient, low-carbon design.
3. **Gender targets are tracked in real time** via the e-permitting dashboard: ? 30 % women on code-review panels and disaggregation of permit approvals by gender of firm ownership.

These refinements meet every element of the Secretariat?s comment and reinforce the Lom?-focused, outcomes-driven nature of Component 1.

(iv.a) Component 3; (iv.b) : Agency's Response from June 16 2025

The updated PIF now pinpoints **one instrument? a Partial Credit Guarantee Facility (PCGF)**?and demonstrates exactly how it is financed, governed and embedded in the project?s logic.

Secretariat request	How the revised PIF answers it
iv.a ? Clarify instrument and finance scale	<i>Instrument chosen:</i> PCGF housed in BOAD/FOGAR-Climat (no revolving fund). ? First-loss cushion US \$ 2.5 m (domestic FOGAR-Climat capital counted as co-finance). ? Senior risk-sharing brings the guarantee window to ? US \$ 10 m . ? Parallel credit lines ? US \$ 37 m already penciled in by BOAD (6.1 m), AfDB (5.1 m) and IFC (? 25.7 m) provide lending power for climate-smart deals.

Secretariat request	How the revised PIF answers it
iv.b ? Show integration, partners, drivers & scaling	<p>Data-pipe integration: Lom??s new e-permitting system (Component 1) auto-flags every code-compliant building or transport permit into the PCGF portal, slashing due-diligence costs.</p> <p>Eligible pipeline: guaranteed loans finance the very assets piloted under Component 2?10-15 km NbS drainage corridors, five BRT/e-bus lines, ~100 resilient housing retrofits and an e-moto taxi swap-out?closing the finance gap identified in the Theory-of-Change.</p> <p>Capacity & inclusion: ? 300 bankers/developers/SMEs (? 30 % women) trained in climate-risk underwriting; dashboard publicly tracks the ? 30 % women-led borrowing target.</p> <p>Sustainability trigger: Output 3.5?s ?Transition Pact? obliges at least two partner banks to re-capitalize ? US \$ 5 m of first-loss capital with their own funds by Year 5, proving commercial viability.</p> <p>Barrier solution mapping: the PCGF directly tackles high perceived default risk, thin deal flow and limited underwriting skills?the key private-capital barriers highlighted in the updated Theory-of-Change.</p>

Result

Component 3 now delivers a fully capitalized, gender-responsive PCGF that is *hard-wired* to the regulatory reforms of Component 1 and the physical pilots of Component 2, while a clear exit strategy secures post-project replication. This directly satisfies the Secretariat?s iv.a and iv.b requests for clarity on financing scale and integration.

Secretariat comment (iv.a & iv.b) : Agency's Response from June 16 2025

The revised PIF now features **one, fully-financed Partial-Credit-Guarantee Facility (PCGF)**?there is **no revolving-fund element** in the design. The PCGF will be housed in **BOAD?s FOGAR-Climat** window and structured as follows:

- ? **Risk-capital structure**
 - o **First-loss cushion ? US \$ 2.5 million** ? provided by BOAD/FOGAR-Climat and booked as co-finance.
 - o **Senior risk-sharing layer ? US \$ 7.9 million** ? BOAD loan US \$ 6.1 m + domestic bank loan ? US \$ 1.8 m.
 - o **Total guarantee window ? US \$ 10 million.**
- ? **Parallel lending it mobilizes**
 - o **Confirmed today ? US \$ 13.15 million** (BOAD 6.1 m + AfDB 5.1 m + domestic bank ? 2 m).
 - o **Additional pipeline ? US \$ 13.45 million** expected from an IFC term-sheet (up to US \$ 25.7 m) that will close during implementation.
 - o Hence the narrative figure ?? US \$ 37 million mobilized? = 23.55 m confirmed inside Component 3 tables **plus** the balance still to be raised. Only the confirmed US \$ 23.55 m appears in the formal co-finance table, fully consistent with GEF policy.
- ? **Role of the GEF/LDCF grant (? US \$ 2.23 m)**

- o Finances **TA and operating costs only**?legal structuring, portfolio-risk analytics, a gender-tagged MIS, and three years of O&M and training for ~300 bankers/SMEs.
- o **No grant dollars capitalize the guarantee**, which preserves the grant?s catalytic character.

? **Integration with project logic**

- o Lom??s **digital e-permitting platform (Component 1)** auto-flags every code-compliant project and pipes it into the PCGF ?deal room,? solving the high transaction-cost barrier.
- o **Guaranteed loans** then fund the **nature-based drainage, BRT/e-bus corridors, resilient-housing retrofits and e-moto fleet** detailed in **Component 2**, directly linking finance to physical adaptation and mitigation outputs.
- o Live PCGF data (including sex-disaggregated lending) feed the **national dashboard and Knowledge Hub (Component 4)**, closing the learning loop.

? **Sustainability & exit strategy**

- o **Output 3.5 ?Transition Pact?** contractually commits at least **two partner banks to inject ? US \$ 5 millions of their own first-loss capital by Year 5**, ensuring the PCGF?s continuation without further GEF/LDCF support.

This architecture squarely answers the Secretariat?s request: the instrument is clearly a guarantee, its capital sources and leverage are transparent, and its operation is inseparably woven into the project?s policy (Component 1), infrastructure (Component 2) and knowledge-management (Component 4) cycle?guaranteeing that private finance flows exactly where Lom??s adaptation and mitigation needs are greatest.

Secretariat comment (v) Component 4 : Agency's Response from June16 2025

The revised PIF turns Lom??s pilots into a *national public good* by embedding structured, two-way knowledge exchange with secondary cities:

Secretariat request	How the updated PIF fulfils it	Key paragraph / page
Extend knowledge-sharing beyond Lom?	Output 4.1 launches a cloud-hosted, bilingual <i>National Urban-Climature Knowledge Hub</i> (Year 2). It makes every design drawing, BoQ, gender tool and finance template openly available to all 117 municipalities .	Comp-4 narrative ?Knowledge Hub?, p 38
Include ? but not be limited to ? Kpom?	Output 4.2 creates ?Peer-City Learning Cohorts? with five secondary cities ? Kara, Sokod?, Atakpam?, Ts?vi? & Dapaong ? guaranteeing geographical spread well beyond the Kpom? corridor.	p 38
Provide concrete replication mechanisms	? Hub offers an interactive GIS + green-finance matchmaking board that streams code-compliant projects to lenders. ? Each cohort city receives a ? <i>US \$50 k mini-grant</i> (50 % co-financed) to build one pilot (bioswale block, cool-roof market hall, etc.). ? KPIs: ? 60 municipalities registered and ? 15 peer-city pilots using Hub templates by Year 5.	Outputs 4.1 & 4.2 bullets, pp 37-39

Secretariat request	How the updated PIF fulfils it	Key paragraph / page
Link to M&E & national reporting	Output 4.5 deploys an integrated dashboard that aggregates adaptation, GHG and gender data from Lomé and the five cohort cities; quarterly briefs feed the Inter-Ministerial Committee and auto-populate Togo's NDC reports.	p 39
Maintain strong gender & inclusion focus	<ul style="list-style-type: none"> Hub editorial board 50 % women. Each peer-city mission 30 % women delegates; at least two cohort cities must nominate a female climate focal point. 	Gender rows, Comp-4 GAP table, p 40

Resulting impact

- By Year 5, the Hub reaches > 5 000 unique users and cuts design costs for secondary-city projects by 40 % (BOAD estimate).
- Mini-grants ensure real assets not just documents are built outside Lomé before project close.
- Live dashboards institutionalize data-driven adaptation, GHG and gender tracking at both city and national levels.

These enhancements fully meet, and exceed, the Secretariat's request to embed systematic, country-wide knowledge sharing moving the project from a Lomé pilot to a scalable national model.

Secretariat comment (v): Agency's Response from June 16 2025

Expand the articulation of Lomé's climate-driven flooding problem and show how project activities address it.

The revised PIF now demonstrates with climate-science evidence and clear engineering linkages why intensified flooding is the central adaptation challenge for Lomé and how each project component directly tackles it:

- Climate driver clarified** A new paragraph in Section A (P.5) explains that CMIP-6 projections (SSP5-8.5) show an **18 % rise in very-wet-day rainfall (R95p)**, while IPCC-AR6 regional curves project **21 cm of relative sea-level rise by 2050**. Hydrodynamic modelling by Togo's Ministry of Environment (HEC-RAS, 2023) indicates these two forces will **add 25 cm to the depth of a 1-in-10-year urban flood**, raising annual damage from ~2 % to ~4 % of city GDP by mid-century.
- Figure 2 replaced & enriched** The old variability chart has been substituted with a **two-panel graphic**: *Panel A* maps percentage change in extreme rainfall (R95p) under SSP5-8.5; *Panel B* shows AR6 median and 95 th-percentile sea-level-rise trajectories for the Gulf of Guinea. The caption synthesizes their compound impact on urban inundation depths.
- Problem statement deepened** A boxed text 'Flooding in Lomé' quantifies present-day losses, projects future costs without intervention, and highlights social vulnerability in the low-lying districts of B and Atti-gou.
- Direct line to project measures** The same section explicitly links the quantified hazard to:

- o **Component 1:** new building & zoning ordinances requiring **0.8 m freeboard** and **30 % permeable surface** plus mandatory Early-Warning-System (EWS) checks;
 - o **Component 2:** **10-15 km of nature-based drainage corridors** and **elevated, cool-roof housing retrofits**;
 - o **Component 3:** the PCGF-backed lending window that finances these resilient works;
 - o **Component 4:** a dashboard that streams flood-performance data into national NDC reporting.
5. **Robust referencing** ? Footnotes now cite CMIP-6 Consortium (2021), IPCC-AR6 Coastal Chapter, Zhang et al. (2022) on Gulf of Guinea SLR, and the **2023 HEC-RAS study** commissioned by the Ministry of Environment.

These additions provide a **strong, evidence-based justification** for the project's focus on flood-resilient urban design and ensure that every adaptation intervention is traceably rooted in the latest climate-risk analysis as requested by the Secretariat.

3.2 Are gender dimensions, knowledge management, and monitoring and evaluation included within the project components and appropriately funded?

Secretariat's Comments

8 September 2025:

Cleared, pending any further comment from OP colleagues on policy alignment.

16 June 2025:

Please strengthen gender dimension throughout the project, including within the components.

26 March 2024:

- i) Please specify in this section who the Execution Agency will be for this project.
- ii) Please also specify if there will be a project implementation committee, how will be involved, and how this will be managed.

Agency's Comments

Agency's Response from June 16 2025

Gender Mainstreaming

#	Secretariat request (16 Jun 2025)	How the updated PIF now meets it	Key evidence / page ref.*
1	Capture gender measures in key components (1.1, 2.2, 3.6, 4.1, 4.2).	<p>Component 1.1 ? ? 30 % women on the Code-Review Panel & Inter-ministerial Climate Committee (IMCC); the new e-permitting dashboard tags every permit by gender of firm ownership.</p> <p>Component 2.2 ? Female-headed households receive first call on the 100 resilient retrofits (? 30 % of units); women?s focus-groups co-design lighting, CCTV and crossing points on the NMT network.</p> <p>Component 3.6 ? Green-jobs track certifies ? 65 female e-mobility mechanics (? 30 % of the 205 total).</p> <p>Component 4.1 ? Knowledge-Hub editorial board ? 50 % women; portal analytics display the share of downloads by women-led SMEs & female officials.</p> <p>Component 4.2 ? Each peer-city cohort delegation ? 30 % women and ? 2 of 5 partner cities nominate a female climate focal point.</p>	<p>? Comp 1 text pp 28-31</p> <p>? Comp 2 p 33</p> <p>? Comp 3 p 35</p> <p>? Comp 4 pp 38-39</p>
2	Guarantee women-led bankers, developers & SMEs benefit (3.1 & 3.2 ? 30 %).	The PCGF ring-fences ? 20 % of its guarantee capacity for women-owned firms and sets a portfolio-wide KPI of ? 30 % women-led borrowers; results are published quarterly on a public dashboard. One women-only cohort is built into the 300-person green-finance course; overall course participation ? 30 % women.	Comp 3 narrative pp 34-36
3	Add gender-specific indicators to the Results Framework.	<p>CI-G1 % women on IMCC (baseline 0 %, target ? 30 %).</p> <p>CI-G2 % PCGF loan-volume to women-led firms (baseline 0 %, target ? 30 %).</p> <p>CI-G3 # women trained (target ? 105 of 350).</p> <p>CI-G4 # female-headed households protected through retrofits (target ? 40).</p>	Results Framework table pp 46-48
4	Allocate a dedicated budget for the Gender Action Plan (GAP).	A ring-fenced envelope of ? US \$ 250 000 finances: ? Sex-disaggregated upgrades to the e-permitting platform ? 45 k ? Household outreach & NMT safety audits ? 60 k ? Women-only green-finance cohort & pipeline clinics ? 80 k ? NbS on-site coaching & gender-sized PPE ? 45 k ? Travel bursaries for women in peer-city exchanges ? 20 k	Annex A financing table & budget notes
5	Ensure MTR & TE report on gender progress.	The M&E ToR now require Mid-Term Review and Terminal Evaluation to analyze all CI-G metrics and report on GAP delivery; the integrated dashboard auto-exports sex-disaggregated data for both reviews.	? 4.5 Integrated M&E System p 39

The updated PIF strengthens gender integration

- ? **System-wide coverage:** Gender actions span policy (Component 1), physical works (Component 2), finance (Component 3) and knowledge (Component 4), aligning with the three project-level principles of *voice & leadership*, *equitable access*, and *data-driven accountability*.
- ? **Measurable, budgeted, reportable:** Four dedicated gender core indicators are embedded in the Results Framework; a clearly costed US \$ 250 k GAP budget is ring-fenced; and mandatory gender reporting is built into both MTR and TE.
- ? **Private-sector empowerment:** The PCGF?s ex-ante ring-fence plus a ? 30 % portfolio KPI ensure women-led SMEs access at least **US \$ 11 m** of climate-smart

finance?turning gender equality from a compliance box into a market-shaping instrument.

With these enhancements the PIF fully, and demonstrably, satisfies the Secretariat's request to mainstream gender throughout the project lifecycle.

3.3 a) Are the components adequately funded?

b) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?

c) Is the PMC equal to or below 5% of the total GEF grant for FSPs or 10% for MSPs? If the requested PMC is above the caps, has an exception (e.g. for regional projects) been sufficiently substantiated?

Secretariat's Comments

8 September 2025:

Cleared.

16 June 2025:

Please note comments above on budget, including allocating of budget that was initially foreseen for Kpom? to activities in Lom?, as well as ensuring sufficient funds for component 3 on innovative finance.

26 March 2024:

A) Budget for some of the components seems high, given the project seems to only focus on capacity building, rather than implementation of tangible climate adaptation and mitigation actions. This would have to be addressed for the project to be eligible for GEF funding.

B) Yes

C) Yes

Agency's Comments

Agency's Response from June 16 2025

Secretariat request	How the updated PIF now addresses it	Key evidence & page ref.
a) Re-allocate all Kpom? funds to Lom?	Every Kpom? line (100 retrofits & inter-city bus lane) was deleted. ? US \$ 1.75 m of GEF grant + US \$ 19 m co-finance were shifted to Lom? Outputs 2.1?2.3 (NbS drainage, 100 Lom? retrofits, 5 BRT/NMT corridors).	Indicative Project-overview table & Component 2 narrative, pp. 3-4 & 28

Secretariat request	How the updated PIF now addresses it	Key evidence & page ref.
b) Ensure sufficient resources for Component 3 (Innovative Finance)	Component 3 now receives US \$ 2.23 m of the GEF grant (0.85 m STAR + 1.38 m LDCF). This fully covers: ? legal structuring & risk tools for the PCGF; ? three years of OPEX; ? gender-tracked MIS & the 300-person green-finance course.	Component-budget split, p. 31
c) Strengthen GAP financing	A ring-fenced US \$ 250 000 envelope is shown in the cost table: ? e-permitting sex-disaggregated upgrades ? 45 k ? retrofit & NMT outreach/safety audits ? 60 k ? women-only green-finance cohort & clinics ? 80 k ? on-site NbS coaching & gender-sized PPE ? 45 k ? travel bursaries for peer-city exchanges ? 20 k	Annex A financing table (cross-cutting line)
d) Keep envelope & PMC coherent	? Total GEF grant US \$ 9.321 m (GET 3.867 m + LDCF 5.454 m) ? unchanged. ? Co-finance still US \$ 56 m . ? Project-management cost US \$ 0.47 m (0.19 m GET + 0.28 m LDCF) ? 5 % ceiling.	Annex A financing table, p. 55

Result

- ? **All Kpom? resources are now re-deployed in Lom?**, matching the Secretariat?s direction.
- ? **Component 3** is adequately funded to launch and run the US \$ 10 m Partial-Credit-Guarantee Facility and the associated capacity-building programme.
- ? The **Gender Action Plan is fully costed at US \$ 250 k**, ensuring implementation, monitoring and reporting across every component.
- ? The total GEF, co-finance, and PMC figures remain internally consistent and within policy thresholds.

4 Project Outline

A. Project Rationale

4.1 SITUATION ANALYSIS

a) is the current situation (including global environmental problems, key contextual drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective?

b) Are the key barriers and enablers identified?

Secretariat's Comments

8 September 2025:

Cleared.

16 June 2025:

Please address the comments above, particularly on climate change adaptation related to flooding.

26 March 2024:

A) No. Please see and address the full set of comments above and below , in addition to the following further point:

(i) The project's adaptation rationale needs to be strengthened with more information about climate projections in the country/region. BOAD can refer to World Bank's CCKP portal for this analysis.

(ii) Very little information is provided on the climate adaptation problem that this project will address. For example, what are the specific climate hazards and their impacts that this project will address? In describing this, it is important to include 2 forward looking scenarios (one optimistic, and one pessimistic) of how the impacts of these hazards are expected to change (presumably increase) over time, preferably using RCP 4.5 and RCF8.5 to 2050, or similar, and take into account broader development challenges. This is important to identify and design climate change adaptation solutions that are focused to address the current and expected adaptation problem. It will be important to expand on this section, and elaboration on the climate adaptation solutions (options) that will be financed by this project to address the stated climate problem(s) and risks.

B) No. Please see and address the full set of comments above and below, in addition to this further point:

i) A significant risk is that the Kpom? satellite city does not really target increased resilience for low and middle income populations who are especially highly vulnerable to climate impacts, but rather attracts upper income populations who may be better able to afford to move to the new city and who already have a relatively higher level of adaptation capacity? How will this risk be managed for this component? If this risk cannot be convincingly managed, please consider focusing this project on existing populations centres where large numbers of highly vulnerable populations live.

Agency's Comments

Agency's Response from June 16 2025

Secretariat request (16 Jun 2025)	How the updated PIF now responds	Key evidence / page reference
a-1. Describe the current situation from a systems perspective	New subsection ?Systemic feedback loops? shows how rapid in-migration ? impermeable sprawl ? drainage overload amplifies flood risk, while car dependence worsens the urban heat-island and electricity demand, locking Lom? in a ?flood-and-carbon trap.?	p. 10
a-2. Substantively expand the climate-flood narrative (incl. sea-level rise)	? CMIP6-SSP5-8.5 projects +18 % in very-wet-day rainfall (R95p, 2041-2060). ? IPCC-AR6 gives ? +21 cm median relative SLR by 2050. ? Ministry of Environment HEC-RAS 2023 modelling shows the compound effect adds ? 25 cm to the 1-in-10-year flood depth. Text explicitly links these drivers to NbS drainage, elevated-foundation codes (+0.8 m), and EWS zoning tackled under Components 1 & 2.	p. 7 (paragraph beginning ?While mean annual rainfall ??)
a-3. Revise Figure 2 to depict these drivers	Figure 2 replaced by a split graphic: (a) CMIP6 %-change map for R95p, (b) AR6 regional SLR curves (median & 95th %ile); caption explains combined impact on flood depths.	p. 8

Secretariat request (16 Jun 2025)	How the updated PIF now responds	Key evidence / page reference
a-4. Add peer-reviewed sources	New footnotes cite CMIP6 Consortium 2021, IPCC AR6 (2021), Zhang et al. 2022, MoE HEC-RAS 2023.	Footnotes 6-9, p. 7
b-1. Identify barriers & existing enablers	Table A-2 ?Critical Barriers vs. Existing Enablers? pairs five blockers (EWS gaps, outdated codes, car-centric mobility, thin private capital, fragmented governance) with tangible enablers (Gov?t Priority #2, BOAD FOGAR-Climat, AfDB/WB loans, women-entrepreneur networks, open-data platforms).	p. 12
b-2. Show causal pathway from barriers to project actions	Figure 4 ?Barrier ? Enabler ? Intervention Pathway? illustrates how Components 1-4 resolve each barrier, tying LDCF-funded adaptation and GEF-TF mitigation actions to resilient, low-carbon outcomes.	p. 13

Result:

Section 4.1 now (i) frames Lomé's predicament as a self-reinforcing flood-and-carbon system, (ii) quantifies the climate signal from both extreme rainfall and sea-level rise, and (iii) provides a transparent barrier ? enabler ? intervention logic backed by the latest peer-reviewed science. These upgrades fully satisfy the Secretariat's 16 June 2025 request for a strengthened situation analysis focused on climate-driven flooding.

4.2 JUSTIFICATION FOR PROJECT

a) Is there an indication of why the project approach has been selected over other potential options?

b) Does it ensure resilience to future changes in the drivers?

c) Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region?

d) are the relevant stakeholders and their roles adequately described?

Secretariat's Comments

8 September 2025:

Cleared.

16 June 2025:

Please address the comments above, particularly on climate change adaptation related to flooding.

26 March 2024:

A) No. Please do so.

B) No. Please address the relevant comments above and below.

C) Limited. Please provide a brief explanation of how this proposed project will build on each of the listed investments, in the section on "Coordination and Cooperation with Ongoing Initiatives and Projects".

D) No. Please do so, including the roles of municipal and community authorities, as well as gender oriented organizations.

Agency's Comments

Agency's Response from June 16 2025

Below is how the **re-drafted PIF** answers each sub-question and exactly where the supporting text can be found.

Secretariat request (16?Jun?2025)	How the revised PIF addresses it	Exact location / evidence*
a)?Indicate why the chosen approach was selected over other options.	Section Why an integrated approach?? compares three pathways ??(i) grey?only drainage, (ii) transport?only upgrade, (iii) integrated bundle (NbS?+?BRT/e?bus?+?0.8?m flood?elevation & cool?roof code). Only the bundle passes cost?effectiveness, adaptation, mitigation and gender?inclusion tests; table shows the two rejected options and the rationale.	p?15
b)?Demonstrate resilience to future climate drivers.	Same page includes a stress?test table using MoE HEC?RAS model under CMIP?6 SSP2?4.5 & SSP5?8.5 to?2070: bioswale corridors retain >?90?% hydraulic capacity and 0.8?m freeboard maintains safety in the harsher SSP5?8.5 case; Year?4 LiDAR?+?infiltration survey budgeted for mid?course correction.	p?15
c)?Show how the GEF alternative builds on ongoing / previous investments.	Table?B?1 ?Existing Investments Leveraged? cross?links each component to live programmes (WB Urban Mobility, AfDB Drainage Loan, BOAD FOGAR?Climat, GEF?6 WACA, UNDP pilots, AFD upgrades) and specifies the incremental GEF/LDCF value added (NbS inserts, PCGF first?loss, gender carve?outs).	p?18
d)?Describe stakeholders and their roles.	Table?B?2 lists four tiers ? policy setters, executors, beneficiaries, knowledge partners ? and embeds gender actions (??30?% women on IMC, 50?% on Knowledge?Hub board, 20?% PCGF carve?out).	p?22
Strengthen climate?flood rationale.	Added paragraph quantifying +18?% R95p rainfall +?21?cm SLR ???25?cm extra flood depth ; Figure?2 replaced by CMIP?6 R95p map?+?AR6 SLR curves; cites Zhang?et?al?2022 and MoE HEC?RAS?2023.	pp?6?8

Section?4.2 now explains why the integrated NbS?+?zero?emission mobility?+?code package was selected, proves it is robust to 2070 climate stresses, shows exactly how it plugs gaps in six ongoing donor programmes, and details stakeholder roles with gender quotas. The flood?risk narrative has been strengthened with AR6 & HEC?RAS data. These edits fully meet the Secretariat?s 16?June?2025 requests on project justification and climate?flood linkage.

5 B. Project Description

5.1 THEORY OF CHANGE

a) Is there a concise theory of change that describes the project logic, including how the project design elements will contribute to the objective, the expected causal pathways, and the key assumptions underlying these?

b) Are the key outputs of each component defined (where possible)?

Secretariat's Comments

8 September 2025:

Cleared.

16 June 2025:

Please address the comments above, particularly on integration of the innovative financing elements in component 3, and focus of components 1, 2, and 3 on Lom?.

24 March 2024:

Although there is a brief theory of change, it does not include how the project design elements will contribute to the objective, nor does it address the causal pathways and they key assumptions underlying these.

In its current form, the Theory of Change is flawed: It indicates a short series of "ifs", then Togo will be on the path to more resilient, low-carbon development. However, the project outputs and outcomes seem to focus almost exclusively on a relatively small portion of the population in satellite city that does not yet exist, and as currently designed is likely to have limited impact on the population of Togo as a whole. There is also risk that the project has potential to divert valuable adaptation and mitigation capacity and focus away from Lom? and other cities; increase potential for increased emissions and maladaptation due to transportation implications from the planned satellite city and places of employment in Lom?; and the risk of the planning satellite city not being completed in a timely manner. As such, the theory of change will require reformulation.

Agency's Comments

Agency's Response from June 16 2025

Below we show how the resubmitted PIF satisfies each element of the above comment.

Secretariat request (16?Jun?2025)	How the revised PIF addresses it	Exact location?/?evidence
a)?Provide one concise, integrated Theory?of?Change (ToC) describing the causal pathway and assumptions.	New narrative ? Concise Theory?of?Change (If??Then chain)? replaces the former bullet list. It sets out a four?step logic:1??? Policy?+?digital reforms (Comp?1) ? 2??? On?the?ground pilots (Comp?2) ? 3??? Innovative finance ? PCGF (Comp?3) ? 4??? Knowledge?&?M&E (Comp?4) ? resilient, low?carbon Lom?.A boxed annex ? Key Assumptions & Externalities? lists six testable assumptions (bank participation, NbS plant availability, gender?quota enforcement, etc.).	pp?23?26
b)?Define key outputs for every component.	Table ? Key Outputs by Component (all Lom??specific)? gives 12 outputs with numeric targets, e.g. ???5 city?wide ordinances?, ?10?15?km NbS drainage?, ?US?\$?37?m private loans mobilised?.	pp?24?25

Secretariat request (16 Jun 2025)	How the revised PIF addresses it	Exact location/evidence
c) Integrate innovative financing elements of Component 3 into the ToC.	Schematic arrow 'Permitting PCGF US\$37m climate smart lending' shows how code-compliant permits (Comp 1) flow automatically into the Partial Credit Guarantee Facility (Comp 3). Narrative explains the data pipe and the 30% women-led borrower quota.	p 24 & ToC map
d) Keep Components 1-3 focused on Lom (no Kpom).	Schematic header reads 'Lom-centric intervention logic (all GEF/LDCF resources inside municipal boundary)'; no reference to Kpom remains anywhere in 5.1.	Throughout 5.1
e) Highlight gender indicators and M&E linkage.	Every output row carries a gender marker (e.g. PCGF loans to women-led firms 30%, 40 female-headed households retrofitted?). Footnote links these to the gender-disaggregated dashboard in Comp 4 and obliges Mid-Term Review & TE to report on GAP progress.	p 25

Section 5.1 now presents a single, Lom-focused Theory of Change with a clear If-Then logic, quantified outputs for every component, seamless integration of the PCGF financing loop, and explicit gender and M&E hooks fully addressing all Secretariat comments.

5.2 INCREMENTAL/ADDITIONAL COST REASONING

Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12?

Secretariat's Comments

8 September 2025:

Cleared, pending any further comment from OP colleagues on policy alignment.

16 June 2025:

Please address the comments above

26 March 2024:

Please address the set of comments.

Agency's Comments

Agency's Response from June 16 2025

Incremental / Additional Cost Reasoning

Secretariat request (16 June 2025)	How the revised PIF now satisfies it	Exact location / evidence
a) Present incremental logic per GEF/C.31/12.	Section 5.2 re-written in the prescribed format. Baseline vs With Project table contrasts conventional drains / diesel buses / no code scenario with NbS drainage, zero emission BRT/e-motos and city-wide flood elevation + energy efficiency ordinances. Four row cost layer matrix (Adaptation, Mitigation, Systemic/Enabling, Knowledge & Gender) tags each grant line to Guideline 10/12.	Baseline table and cost layer matrix pp 19/20
b) Link LDCF grant to quantified flood adaptation benefits.	Under Adaptation additions (LDCF): US\$1.9m premium for permeable paving, bioswale vegetation & wetland buffers. Outcome: 40% reduction in flood losses for ~45,000 residents across 300ha (MoE HEC RAS 2023, SSP5 8.5 stress test).	Adaptation bullet list & footnote pp 19/20
c) Clarify leverage & financial additionality (PCGF).	PCGF first loss = US\$2.5m (BOAD equity, counted as co-finance) + grant-funded TA/ops. Guarantee window US\$10m mobilises US\$37m in parallel loans (BOAD 6.1m, AfDB 5.1m, IFC 25.7m). Financing schematic shows grant pays only structuring, tools & three-year OPEX fully consistent with GEF policy.	Financing schematic bottom p 20
d) Demonstrate knowledge & gender increments.	US\$0.95m line funds the Urban Climate Knowledge Hub, peer-city mini-grants and the US\$0.22m Gender Action Plan; justified under Guideline 12(c).	Matrix row Knowledge & gender p 20
e) Summarise aggregate incremental value.	Text concludes that the US\$9.32m grant (10% of total outlay) secures global benefits 640kt CO ₂ e cuts, flood loss reduction, biodiversity gains & gender equity while leveraging US\$56m confirmed co-finance (ratio 1:6).	Closing paragraph of 5.2

Key takeaways for the Secretariat

- **Structured exactly per GEF/C.31/12:** baseline, incremental layers, guideline cross-references.
- **Adaptation increment quantified:** US\$1.9m 40% flood loss reduction for 45,000 people.
- **Mitigation increment:** US\$2.0m 640kt CO₂e avoided.
- **Systemic increment:** PCGF first loss plus grant-funded TA delivers a 1:15 leverage and embeds a market exit strategy.
- **Knowledge & gender:** dedicated funding ensures replication and inclusive benefits.

These revisions fully address the Secretariat's outstanding comments on incremental / additional cost reasoning.

5.3 IMPLEMENTATION FRAMEWORK

a) Is the institutional setting, including potential executing partners, outlined and a rationale provided?

b) Comments to proposed agency execution support (if agency expects to request exception).

c) Is there a description of potential coordination and cooperation with ongoing GEF-financed projects/programs and other bilateral/multilateral initiatives in the project area

d) are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?

Secretariat's Comments

8 September 2025:

Cleared, pending any further comment from OP colleagues on policy alignment.

16 June 2025:

(i) Please clarify the implementation arrangements, including the relative responsibilities of the Ministries of Transport and Urbanism, as well as the coordination of the execution of the project.

(ii) Please list relevant ongoing and previous projects that this project will build on, learn from, complement, and coordinate with, with a brief explanation of the relationship with each.

(iii) In the section "Coordination and Cooperation with Ongoing Initiatives and Projects" there is a contradiction: on one hand, the Agency responded "Yes" to the question "Does the GEF Agency expect to play an execution role on this project?" however, right after the Agency says that they do not expect to play an execution role in this project. Please ask the Agency to amend by removing the answer "yes" to the first question.

Coordination and Cooperation with Ongoing Initiatives and Project.

Does the GEF Agency expect to play an execution role on this project? Yes

If so, please describe that role here. Also, please add a short explanation to describe cooperation with ongoing initiatives and projects, including potential sharing of expertise/staffing

The GEF Agency does not expect to play an execution role on this project.

26 March 2024:

A) Please see comments for question 3.2.

B) N/A

C) Please see comment for 4.2(C)

D) Yes

Agency's Comments

Agency's Response from September 8 2025

The response to "Does the GEF Agency expect to play an execution role on this project?" has been changed to **No**. Execution will be carried out by the **Government of Togo** through a **Project Management Unit (PMU) in the Ministry of Transport**, with delegated roles to line ministries and the Municipality of Lomé. **BOAD**, as **GEF Agency**, provides **fiduciary oversight, reporting, and safeguards supervision**, and supports **PCGF governance/TA**;

it **does not** procure or implement works or TA financed by the GEF grant. The narrative in the **Coordination and Cooperation with Ongoing Initiatives and Projects** section has been aligned to reflect **Government-executed / BOAD-oversight** arrangements.

Agency's Response from June 16 2025

Secretariat request (16 Jun 2025)	How the revised PIF addresses it	Key evidence*
<p>(i) Clarify implementation arrangements, especially the roles of the Ministry of Transport vs. Ministry of Urbanism and overall coordination.</p>	<p>A five-tier governance architecture is set out in a new sub-section Institutional set-up and execution logic:</p> <ol style="list-style-type: none"> Project Steering Committee (PSC) chaired by Minister of Economy & Finance; Transport & Urbanism are permanent members; 50% women. Project Management Unit (PMU) housed in Ministry of Transport (MoT); BOAD seconded fiduciary staff. Technical Working Groups (TWGs) <ul style="list-style-type: none"> TWG Mobility (MoT lead) handles e-bus/BRT & NMT works. TWG Drainage & NbS (Ministry of Urbanism & Housing lead) signs off on bioswales, permeable roadbeds & wetland buffers. PCGF Board BOAD/FOGAR Climat + partner banks; 30% women; issues guarantees from e-permitting pipeline. Knowledge Hub Editorial Board six members, 50% women; curates content & runs annual Forum. <p>Narrative explains the divide and co-lead model and why the PMU sits in MoT while BOAD assures fiduciary quality.</p>	<p>Table & narrative pp 21-22</p>
<p>(ii) List ongoing / previous projects to be leveraged and describe coordination.</p>	<p>Matrix Coordination & co-operation with ongoing initiatives details six programmes and their linkages:</p> <ul style="list-style-type: none"> World Bank Lom Urban Mobility (US\$20m): GEF adds flood-proof roadbeds & gender safety audits; shared design office & harmonised ESMPs. AfDB Drainage Upgrade Loan (US\$19.25m): hydraulic models & contractors; MoU on BoQs; AfDB engineers embedded in TWG Drainage. BOAD FOGAR Climat (US\$18m issued): hosts first loss tranche of PCGF; shared MIS. UNDP Urban Resilience Pilots (closed 2024): community EWS kits integrated into Component 1 training. GEF 6 Coastal Adaptation (ID 9834): wetland SOPs adopted for Lom buffers. AFD Urban Upgrading Initiative (US\$6.7m): neighbourhood upgrades meshed with NbS corridors; donor round table chaired by PSC. 	<p>Matrix pp 22-23</p>

Secretariat request (16 Jun 2025)	How the revised PIF addresses it	Key evidence*
(iii) Describe knowledge and learning capture & dissemination.	Component 4 provides: National Urban Climate Knowledge Hub open source portal; targets 60 municipalities by 2025. Interactive GIS + green finance board linking bankable projects to lenders. Peer City Learning Cohorts Lomé twinned with Kara, Sokodé, Atakpamé, Tsévié, Dapaong; mini grants (US\$250k) for one pilot per city. Annual Urban Climate Forum proceedings uploaded within 1 week. Integrated M&E dashboard streams adaptation, GHG and gender data into NDC reporting.	Component 4 narrative & Output 4.1 4.5, pp 37-39
(iv) Agency execution support (exception).	No execution exception needed. BOAD limits its role to fiduciary backstopping, PCGF management and M&E QA; all works & TA are procured by the MoT hosted PMU in line with GEF policy.	Role of BOAD under Agency execution rules, p 22

Summary for the Review Sheet

- The revised PIF now **clearly delineates responsibilities** between Transport (mobility works) and Urbanism (NbS drainage), with joint decision tools and a single M&E dashboard.
- A **comprehensive coordination matrix** shows exactly how six ongoing donor programmes are leveraged and how duplication is avoided.
- Knowledge capture and dissemination are ensured through a **national digital Hub, peer city cohorts, and an annual Urban Climate Forum**, all with explicit gender targets.
- BOAD's execution role remains confined to fiduciary, guarantee and M&E support, fully consistent with GEF execution rules.

These enhancements fully respond to the Secretariat's 16 June 2025 queries on the implementation framework.

5.4 a) Are the identified core indicators calculated using the methodology included in the corresponding Guidelines (GEF/C.54/11/Rev.01)?

b) Are the project's indicative targeted contributions to GEBs (measured through core indicators)/adaptation benefits reasonable and achievable?

Secretariat's Comments

30 Sept 2025:

Cleared

8 September 2025:

A) For the Climate Mitigation GEF Trust Fund indicator 6 on climate mitigation, please provide the excel file or the module where all the assumptions and calculations are explained for the numbers indicated in Climate Indicator 6.

B) For the LDCF/SCCF CCA indicators, please strive further to increase the percentage of people trained to be 50% female.

16 June 2025:

- (i) The number of LDCF direct beneficiaries for climate adaptation seems low. Please increase.
- (ii) Please confirm that LDCF core indicator 2 (hectares) is 300,000 (three hundred thousand).
- (ii) The number of LDCF private sector enterprises engaged is low, especially given components 2 and 3. Please increase.

26 March 2024:

- i) No. As it is currently designed, the project appears likely to benefit a relatively small portion of the population (10,000) by improving the climate resilience of housing for only a portion of people who will relocate outside of the capital city of Lomé to a new, not yet established, city (Kpomé).
- ii) The target indicators are very low for a project of this scale primarily due to lack of effective design and target geography.
- ii) The number of beneficiaries is indicated to be 51% male and 49% female, despite the PIF indicating that Togo's population is 49% male and 51% female. This split of beneficiaries in the PIF would have to be revised.
- iii) Why are there no indirect Greenhouse gas emissions mitigated (GET indicator 6)?
- iv) Why are there no energy savings (indicator 6.3)?
- v) Please complete indicator 6.4 as relevant
- vi) For LDCF core indicators, please indicate the number of private sector enterprises engaged. This should be a key aspect of the project, especially given the sectoral focus on climate resilient buildings and infrastructure.

Agency's Comments

Agency's Response from September 8 2025

A) For GEFTF Core Indicator 6, we attach **CI6_GHG_Assumptions_Togo_v1.1_PIF.xlsx**, a PIF stage workbook with all assumptions, formulas, and sources. During PPG, we will (i) replace benchmarks with vendor and survey data, (ii) add uncertainty bands and scenario toggles, and (iii) apply independent QA before CEO Endorsement.

We agree and have raised the LDCF/SCCF Core Indicator 4 target to **gender parity**. The revised CI4 now reads: **3,205 people trained/with awareness raised, of which 50% women (1,603 women)**. To achieve this, we will (i) ring-fence seats for women in every training stream, (ii) run at least one **women-only** cohort in green finance, (iii) provide child care/transport stipends and safe workshop protocols for the technical tracks, and (iv) track results quarterly on the sex-disaggregated MEL dashboard with course corrections overseen by the Inter-Ministerial Climate Committee. This enhancement is accommodated within existing capacity building budgets (Components 3); **no change to the grant envelope** is required.

Agency's Response from June 16 2025

Core Indicators

Secretariat request (16?June?2025)	Revision introduced in the PIF	Methodology (per?GEF/C.54/11/Rev.01)	Where reflected in PIF*
(i)?Direct beneficiaries (CI?1) appear low; please increase.	Target raised from ??20?000????45?000?people (23?000?F/?22?000?M).	GIS overlay of 2023 ward?level census (??15?000?p??km??) on the 300?ha drainage/NbS footprint ??44?600; rounded to 45?000 (Guidelines Annex?2, step?by?step).	Executive Summary; Component?2 outcomes; Results Framework table.
(ii?a)?Confirm Core Indicator?2 ? hectares.	Confirmed at 300?ha (three?hundred), not 300?000 .	210?ha bioswale corridors (10?15?km???20?m ROW) +?90?ha wetland buffers; digitised from AfDB drawings & MoE HEC?RAS shapefiles.	Results Framework (CI?2) & footnote?27.
(ii?b)?Private?sector enterprises engaged (CI?5) seems low; please increase.	Target increased from 15????25 enterprises (??5 women?owned).	BOAD April?2025 market?sounding: 6 banks, 4 bus operators, 5 drainage primes, 10 green?construction SMEs expected to access the PCGF.	Results Framework (CI?5); Component?3 narrative.
(a)?Methodological compliance	Footnote?27 now states that <i>all</i> core?indicator values follow the GEF/C.54/11/Rev.01 procedures; underlying GIS layers & Excel workbooks are archived in the project data room.	Footnote?27, Results Framework.	
(b)?Reasonableness & achievability	??45?000 = full population inside the 300?ha drainage catchment (municipal rolls). ??300?ha matches AfDB?costed engineering BoQs. ??25 enterprises correspond to signed MoUs in the PCGF pipeline.	Narrative note immediately below Results Framework table.	

Summary

- All three LDCF core?indicator targets have been recalculated with GIS and market evidence, using the exact methodology in?GEF/C.54/11/Rev.01.
- CI?1 increases to ??45?000 **direct beneficiaries**, CI?2 is confirmed at **300?ha**, and CI?5 rises to **25 private?sector enterprises** (??20?% women?owned).
- Figures are internally consistent across the Executive Summary, Component narratives and the Results Framework, and are fully achievable within the five?year implementation window.

These adjustments fully address the Secretariat?s 16?June?2025 comments on core?indicator ambition, methodology and realism.

5.5 NGI Only: Is there a justification of financial structure and use of financial instrument with concessionality levels?

Secretariat's Comments N/A

Agency's Comments

5.6 RISKS

a) Is there a well-articulated assessment of risk and identification of mitigation measures under each relevant risk category?

b) Is the rating provided reflecting the residual risk to the likely achievement of intended outcomes after accounting for the expected implementation of mitigation measures?

c) Are environmental and social risks, impacts and management measures adequately screened and rated at this stage and consistent with requirements set out in SD/PL/03?

Secretariat's Comments

8 September 2025:

Cleared.

26 March 2024:

i) Further to a comment above, please see and fully the significant risk is that the Kpom? satellite city does not really target increased resilience for low and middle income populations who are especially highly vulnerable to climate impacts, but rather attracts upper income populations who may be better able to afford to move to the new city and who already have a relatively higher level of adaptation capacity? How will this risk be managed for this component? If this risk cannot be convincingly managed, please consider focusing this project on existing populations centres where large numbers of highly vulnerable populations live.

iii) Please clarify if anyone will be forcibly displaced for this project. Please detail how people will be identified to move to the proposed new satellite city.

iv) Please note the comments above on risk of increase transportation related GHG emissions due to transportation between the satellite city and Lom?.

Agency's Comments

Agency's Response from March 26 2025

Secretariat question	How the revised PIF answers it	Exact locator
a) Is there a well-articulated assessment of risk and identification of mitigation measures under each relevant category?	<p>Nine-row Risk Matrix (Climate, Environmental & Social, Political/Governance, Macro-economic, FX, Policy, Technical/Supply, Institutional, Fiduciary, Stakeholder) lists the threat, mitigation actions, responsible party and <i>residual</i> rating.</p> <p>ESS screening form (Annex D) details instruments: ESMF?+?site?specific ESMPs, Biodiversity Action Plan, Labour?GBV Code of Conduct, GRM, and trigger for a Resettlement Framework if ever required.</p>	Risk Matrix ??6.1 pp?40?41 ; ESS Screen Annex?D

Secretariat question	How the revised PIF answers it	Exact locator
b) Do the residual risk ratings reflect the situation after mitigation?	A narrative Residual risk summary states overall project risk = Moderate; removal of Kpom scope eliminates the single High risk flagged in the March 2024 review; capacity building and adaptive management keep all other risks at Moderate or Low.	6.3, end of Section 6
c) Are E&S risks screened and rated in line with SD/PL/03?	Project classified Category B (Moderate) site-specific, reversible impacts. Each ESS (1/6) mapped to planned mitigation (see extract at right). No critical habitat conversion, no involuntary physical resettlement, no high-hazard facilities. Category A ruled out.	ESS screen & narrative Annex D

Key points

- ? **Comprehensive, category-by-category risk analysis** with concrete mitigations and responsible entities.
- ? **All residual risks Moderate or lower** after mitigation; overall risk = Moderate.
- ? **ESS screening in full compliance** with SD/PL/03 ? Category B, clear safeguard instruments, and no physical displacement.
- ? Legacy Kpom-related risks eliminated through scope revision.

These changes fully satisfy the Secretariat's outstanding concerns on Section 5.6.

5.7 Qualitative assessment

- a) Does the project intend to be well integrated, durable, and transformative?
- b) Is there potential for innovation and scaling-up?
- c) Will the project contribute to an improved alignment of national policies (policy coherence)?

Secretariat's Comments

16 June 2025:

Please see comments above.

26 March 2024:

Please see the full set of comments.

Agency's Comments

Agency's Response from June 16 2025

Secretariat criterion	How the revised PIF (29 July 2025 draft) addresses it	Key evidence*
a) Integrated, durable and transformative design	<p>Horizontal integration: Component 1's climate smart codes are enforced through the digital e-permitting engine; every compliant permit is auto-streamed into the Partial Credit Guarantee Facility (PCGF), which then lowers borrowing costs for the NbS drainage, BRT/NMT corridors and 100 flood-resilient retrofits financed under Component 2. Performance metrics feed the Knowledge Hub (Component 4), closing the learning loop.</p> <p>Vertical integration: Policy layer (ordinances, Inter-Ministerial Committee 30% women)</p> <p>? Finance layer (US\$2.5m first-loss leverages ?US\$37m senior loans)</p> <p>? Physical layer (1015km NbS drains, 5 zero-emission corridors, 100 codes-compliant retrofits).</p> <p>Durability: Ordinances remain in force; guarantee window revolves for 10yrs; all technical templates released under CC BY-NC-SA 4.0 and hosted on a government server.</p>	??5.7, pp4647
b) Innovation & scaling up potential	<p>Financing innovation: real-time data pipe from e-Permitting ? PCGF collapses bank due-diligence time; first in West Africa.</p> <p>Engineering innovation: hybrid ?bioswale?+?raised?roadbed? stress-tested under SSP58.5 retains >90% hydraulic capacity while doubling as BRT ROW.</p> <p>Digital innovation: open-API dashboard streams adaptation, GHG and gender metrics straight into NDC reporting.</p> <p>Scale pathway: Year 5 trigger obliges 2 banks to recapitalize ?US\$5m of first-loss capital; five peer-city pilots (US\$50k mini-grants) replicate Lom blueprints.</p>	??5.7, pp4647
c) Policy coherence	Common flood-risk and GHG screens shared across Environment, Urbanism, Transport and Finance via the e-Permitting dashboard; overseen by a gender-balanced Inter-Ministerial Climate Committee. Direct alignment with Togo's NDC (2021) and Feuille de Route 2025 ? Priority #2.	??5.7, p47

All changes are captured in **Risk Table** and **ESS screening**, with an overall residual rating of **Moderate** after mitigation.

6 C. Alignment with GEF-8 Programming Strategies and Country/Regional Priorities

6.1 Is the project adequately aligned with focal area and integrated program strategies and objectives, and/or adaptation priorities?

Secretariat's Comments

30 Sept 2025:

Cleared

8 September 2025:

Please provide a response to this comment in the Agency Comments box below.

16 June 2025:

Please address this comment.

26 March 2024:

No. The project is not aligned directly with any of the CCM focal areas. 1.1. Accelerate the efficient use of energy and materials. 1.2. Enable the transition to decarbonized power systems. 1.3. Scale up zero-emission mobility of people and goods. 1.4. Promote Nature-based Solutions with high mitigation potential. There is potential to align with 1.1 with focus on using low carbon materials, green building standards and energy efficiency in buildings. However, the project is not clear on this intervention. Construction of roads and transportation network is not eligible for CCM and is also not deemed a suitable use of LDCF grant resources. Limited LDCF resources can be used for integrating climate risk factors in the design but isn't recommended for investment in roads.

Agency's Comments

Secretariat comments on 6.1: Agency's Response from September 8 2025

The project is explicitly structured to deliver **LDCF adaptation outcomes** together with **GEFTF (CCM) mitigation** results in an integrated urban package:

- ? **LDCF (Adaptation):** Outcome **1.2** (climate-resilient infrastructure) via **10?15 km** of nature-based drainage and **~30 ha** of wetland restoration that protect **?45,000** people and **?300 ha** of urban land; Outcome **2.1** (risk reduction for vulnerable groups) via EWS-zoned e-permitting, UD features on BRT/NMT, and priority measures for women/youth.
- ? **GEFTF (CCM): CCM-1.1** (efficient buildings & infrastructure) through city-wide climate-smart codes and compliance via the digital e-permitting system; **CCM-1.3** (zero-emission mobility) through **five BRT/e-bus/NMT corridors** and an **e-moto swap-out**, jointly avoiding **?560,000 tCO₂e** over 20 years.
- ? **GEF-8 Urbanization Integrated Programme (UIP):** Policy ? pilots ? finance ? knowledge sequencing; an **open-access hub** and a revolving **PCGF** mainstream resilient/low-carbon urban investments and enable replication across Togolese cities.
- ? **Country priorities:** Delivers Feuille de Route 2025 and **NDC** transport/buildings measures; no contradictory policies identified. (Any overlaps are resolved by the Inter-Ministerial Climate Committee.)

These linkages are consolidated in **Section C** of the PIF and mirrored in the **Indicative Project Overview** and **Core Indicators**.

6.2 Is the project alignment/coherent with country and regional priorities, policies, strategies and plans (including those related to the MEAs and to relevant sectors)

Secretariat's Comments

8 September 2025:

Cleared. **in the future, please provide a date for all Agency comments/responses, so that we can correlate Agency and Gef Secretariat comments.**

16 June 2025:

Please address this comment.

26 March 2024:

Please expand on how this project is aligned with Togo's NDC and other climate adaptation and mitigation plans

Agency's Comments

Agency's Response from September 8 2025

Noted for future submissions: Agency responses will include **dates** to ease correlation with GEF Secretariat comments.

Agency's Response from June 16 2025

The resubmitted PIF now contains a stand-alone section **?C.1 Alignment with GEF-8 Results Architecture, National & Regional Strategies?** that clearly shows how every project component serves Togo's priorities, West-African regional agendas and the relevant multilateral environmental agreements (MEAs).

Secretariat request (16 Jun 2025)	How the updated PIF addresses it	Where to find
a) Map each component to GEF-8 Programming Directions (CCM & LDCF)	A results-matrix links: ? CCM-1.1 ? updated building code, 100 cool-roof/PV-ready retrofits, permeable-paver roadbeds. ? CCM-1.3 ? 5 zero-emission BRT / NMT corridors (? 560 kt CO ₂ e avoided). ? LDCF Outcomes 1.2 & 2.1 ? 10-15 km NbS drainage plus EWS-zoned bylaws protecting ? 45 000 residents and 300 ha.	pp. 50-52
b) Clarify link to the GEF-8 Sustainable Cities Integrated Programme (SC-IP)	Lom? has been pre-screened for the SC-IP: ? ?Blue-Green Cities? window ? NbS corridors & cool-roof retrofits. ? ?Innovative Finance? window ? PCGF leveraging ? 10? private capital.	p. 52
c) Show consistency with the LDCF 2022-26 Strategy	Text explains how Core Indicators CI-1 (45 000 people) and CI-2 (320 ha) directly deliver LDCF Results-Chain Outcomes 1 & 2 on urban flood-risk reduction.	p. 51
d) Demonstrate national & regional policy coherence	Cross-references to: ? Togo's NDC (2021) and Feuille de Route 2025 ? Priority #2 (low-carbon mobility). ? ECOWAS Climate-Resilient Mobility Agenda (2022) . ? Abidjan Convention Coastal Plan (2023) ? lagoon wetland buffers.	p. 52
e) Confirm no contradictory policies & explain harmonization	Statement notes no conflicting subsidies or regulations; a gender-balanced Inter-Ministerial Climate Committee (? 30 % women) meets quarterly to keep future ordinances coherent.	p. 52

Secretariat request (16 Jun 2025)	How the updated PIF addresses it	Where to find
f) Cite the MEAs that underpin the project	Paragraph links project outcomes to: ? UNFCCC / Paris Agreement (mitigation & adaptation pillars). ? CBD ? urban wetland & pollinator corridors (Rio Marker BD = 1). ? SDGs 9, 11, 13 ? resilient infrastructure, sustainable cities, climate action.	p. 52

Result ? Why the project is now fully aligned

- ? Every dollar of GEF/LDCF financing now addresses Lom??s priority hazards and emission sources while advancing GEF-8 CCM & LDCF outcomes.
- ? Measures dovetail with national strategies (NDC, Feuille de Route 2025) and reinforce regional frameworks (ECOWAS, Abidjan Convention).
- ? An institutional mechanism (IMCC) guarantees on-going policy coherence and alignment with MEA commitments.

These additions satisfy the Secretariat?s request for a robust demonstration of policy and strategic alignment at country, regional and global levels.

6.3 For projects aiming to generate biodiversity benefits (regardless of what the source of the resources is - i.e. BD, CC or LD), does the project clearly identify which of the 23 targets of the Kunming-Montreal Global Biodiversity Framework the project contributes to and how it contributes to the identified target(s)?

Secretariat's CommentsN/A

Agency's Comments

7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's Comments

October 14, 2025:

For final review and clearance by OP.

October 7, 2025:

Unfortunately, the comment about the Sources of Funds table on LoE not matching the same table in Portal persists. Please note that the total allocation of STAR funds in the LoE must be equal to the total amount in the table Sources of Funds in Portal.

For instance, the allocated amount in LoE corresponds to the CCM STAR focal area for a total of \$4,304,881 (see below in red rectangle)

Source of Funds	GEF Agency	Focal Area Source	Amount (in US\$)				Total
			GEF Project Financing	GEF Project Financing Agency Fee	Project Preparation Grant (PPG)	Project Preparation Grant (PPG) Agency Fee	
LDCF	BOAD	CC Set-Aside	5,454,376	491,389	115,650	10,408	6,071,823
GEFTF	BOAD	CC STAR Allocation	3,866,904	346,035	84,350	7,592	4,304,881
Total GEF Resources			9,321,280	837,424	200,000	18,000	10,376,704

However, even if the Total GEF Resources in the Table Sources of funds in Portal shows the same amount than the total allocated in the LoE (\$4,304,881 see below in red rectangle), the STAR focal areas show a different total allocation individually, as follows:

- Climate Change \$1,723,942 (in green rectangle)
- Biodiversity \$980,315 (in yellow rectangle)
- Land Degradation \$1,600,624 (in blue rectangle)

Sources of Funds for Country Star Allocation

GEF Agency	Trust Fund	Country/ Regional/ Global	Focal Area	Sources of Funds	Total(\$)
BOAD	GET	Togo	Climate Change	CC STAR Allocation	1,723,942.00
BOAD	GET	Togo	Biodiversity	BD STAR Allocation	980,315.00
BOAD	GET	Togo	Land Degradation	LD STAR Allocation	1,600,624.00
Total GEF Resources(\$)					4,304,881.00

Please note that Portal reflects the actual availability of funds in each focal area. Therefore, unless Togo has \$4,304,881 available in Climate Change (in which case, they only need to make the change in Portal), a new LoE is required.

October 1, 2025:

1) The M&E component currently represents 4.7% of the GEF Financing. For projects up to \$10 million, the recommended budget cap for the M&E component is 3%. Please revise accordingly.

2) Figures in table 'Sources of Funds' in the Portal don't match those figures in LoE. Please make sure the figures in the Portal match those in LoE and adjust them in the Portal if relevant? If the figures in the Portal reflect the actual availability of STAR allocation for Togo, a new LoE reflecting these figures is required.

Sources of Funds for Country Star Allocation

GEF Agency	Trust Fund	Country/ Regional/ Global	Focal Area	Sources of Funds	Total(\$)
BOAD	GET	Togo	Climate Change	CC STAR Allocation	1,723,942.00
BOAD	GET	Togo	Biodiversity	BD STAR Allocation	980,315.00
BOAD	GET	Togo	Land Degradation	LD STAR Allocation	1,600,624.00
Total GEF Resources(\$)					4,304,881.00

Source of Funds	GEF Agency	Focal Area Source	Amount (in US\$)				Total
			GEF Project Financing	GEF Project Financing Agency Fee	Project Preparation Grant (PPG)	Project Preparation Grant (PPG) Agency Fee	
LDCF	BOAD	CC Set-Aside	5,454,376	491,389	115,650	10,408	6,071,823
GEFTF	BOAD	CC STAR Allocation	3,866,904	346,035	84,350	7,592	4,304,881
Total GEF Resources			9,321,280	837,424	200,000	18,000	10,376,704

Agency's Comments

Agency's Response from October 7, 2025

Thank you for your feedback.

We confirm that the comment regarding the inconsistency between the Sources of Funds table in the Letter of Endorsement (LoE) and the corresponding table in the GEF Portal has been fully addressed in the revised LoE.

The total allocation of STAR funds in the LoE now exactly matches the total and the distribution by focal area as reflected in the Sources of Funds table in the GEF Portal. All necessary adjustments have been made to ensure consistency and alignment with the actual availability of funds per focal area.

Agency's Response from October 1, 2025

1) As reflected in the updated table, MEL = US\$ 278,000 (US\$ 165,500 GET + US\$ 112,500 LDCF), i.e. 2.98% of the GEF grant (US\$ 9,321,280). Co-financing for MEL = US\$ 1,350,000. This meets the 3% guidance for projects < US\$ 10 m.

2) Portal figures aligned with LoE ? addressed.

We have synchronized the Portal Sources of Funds with the LoE and the revised PIF totals:

- ? **GEF Project Grant: US\$ 9,321,280**
- ? **PPG: US\$ 200,000** (at/below the cap for projects < US\$ 10 m)
- ? **Agency Fees:** recalculated accordingly (grant + PPG), now matching the LoE and PIF.

If at any stage the Portal must reflect a different STAR availability than the LoE, **BOAD will issue an amended LoE** so that **Portal = LoE = PIF**.

7.2 Is a list of stakeholders consulted during PIF development, including dates of these consultations, provided?

Secretariat's Comments

8 September 2025:

Cleared, pending any further comment from OP colleagues on policy alignment.

16 June 2025:

Please address this comment. It is critical to consult with municipal authorities. In doing so, please elaborate more information (date of consultation, key output of consultations, name of specific groups) about consultations with local civil society groups and vulnerable populations including persons with disabilities, informal sector, Indigenous Peoples, women and youth during PIF stage.

26 March 2024:

Yes, but please indicate if municipal authorities were consulted, for Lom? and other population centres. These will be crucial stakeholders for the project.

Please also indicate if gender oriented organizations have been consulted.

Agency's Comments

Agency's Response from June 16 2025

	How the revised PIF now addresses it	Exact location?/?evidence*
?Provide a list of stakeholders consulted during PIF preparation, with dates.?	A new Table?B?3 ?Stakeholder Consultations during PIF Preparation? lists every entity consulted, grouped by stakeholder type, together with precise consultation dates. Stakeholder types covered: ?? Government (7 ministries + Lom? municipality) ? 20?24?Nov?2023 &?31?Jan?2024. ?? Local authorities / communities ? Zio?1 district reps, 22?Nov?2023. ?? Civil?society organizations ? Jeunes Verts &?AGEDI, 31?Jan?2024. ?? Private sector ? National Employers? Council, 11?15?Sep?2023. The table notes that meeting minutes are on file and that a full Stakeholder?Engagement Plan (SEP) will be completed during the PPG phase.	Stakeholder?Engagement subsection, p?52
Coverage of gender?oriented organizations?	Both listed CSOs (Jeunes?Verts &?AGEDI) have explicit gender?inclusion mandates; footnote under the table references this.	Footnote beneath Table?B?3, p?52
Municipal authorities included?	Yes ? Municipality of Lom? (Mayor?s Office) consulted on 31?Jan?2024 .	Table?B?3, ?Government? block, p?52
Future SEP commitment?	Text immediately below the table states that the SEP will be finalized during PPG, building on the consultation minutes already archived.	Same subsection, p?52

Table?B?3 (p?52) now provides the required list of stakeholders consulted during PIF preparation, with dates and coverage across government, local communities, CSOs (with gender focus) and private sector; the text also commits to a full Stakeholder?Engagement Plan during the PPG phase, thereby fully addressing the Secretariat?s comment of 16?June?2025.

8 Annexes

Annex A: Financing Tables

8.1 Is the proposed GEF financing (including the Agency fee) in line with GEF policies and guidelines? Are they within the resources available from (mark all that apply):

STAR allocation?

Secretariat's Comments

26 March 2024:

Yes

Agency's Comments

Focal Area allocation?

Secretariat's Comments

26 March 2024:

Yes

Agency's Comments

LDCF under the principle of equitable access?

Secretariat's Comments

26 March 2024:

Yes

Agency's Comments

SCCF A (SIDS)?

Secretariat's CommentsN/A

Agency's Comments

SCCF B (Tech Transfer, Innovation, Private Sector)?

Secretariat's CommentsN/A

Agency's Comments

Focal Area Set Aside?

Secretariat's Comments

26 March 2024:

Yes

Agency's Comments

8.2 Is the PPG requested within the allowable cap (per size of project)? If requested, has an exception (e.g. for regional projects) been sufficiently substantiated?

Secretariat's Comments

26 March 2024:

Yes

Agency's Comments

8.3 Are the indicative expected amounts, sources and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines?

Secretariat's Comments

8 September 2025:

Cleared, pending any further comment from OP colleagues on policy alignment.

16 June 2025:

1. Please clarify co-financing for component 3 on innovative finance.
2. In-kind co-financing is normally classified as 'recurrent expenditure'. Please request the agency to revise where in-kind is classified as 'investment mobilized' to 'recurrent expenditures'.

Agency's Comments

Agency's Response from June 16 2025

Component 3 now contains a **single, fully-capitalized Partial-Credit-Guarantee Facility (PCGF)** that blends domestic first-loss capital with senior lines from three lenders. The financing breakdown is transparent and fully aligned with the GEF Co-Financing Policy:

Layer	Source	Instrument	Amount (US \$m)	How recorded in GEF tables
Inside the PCGF window ? US \$ 10 m				
First-loss cushion	BOAD/FOGAR-Climat	Equity-like capital	? 2.5	Co-finance ? <i>investment mobilized</i>
Senior risk-sharing	BOAD credit line	Loan to PCGF	6.1	Co-finance ? <i>investment mobilized</i>
	Domestic bank (indicative)	Loan to PCGF	? 1.8	Co-finance ? <i>investment mobilized</i>
Parallel commercial lending mobilized ? US \$ 37 m				
BOAD	Credit line	6.1	<i>Investment mobilized ? already committed</i>	
AfDB	Ring-fenced SME climate line	5.1	<i>Investment mobilized ? already committed</i>	
IFC	Parallel credit facility (term sheet finalized during PPG)	? 25.7	<i>Investment to be mobilized</i>	

- ? **Confirmed, policy-compliant co-finance** now totals **US \$ 23.55 million** (BOAD 6.1 m + AfDB 5.1 m + domestic bank ? 2 m + BOAD first-loss 2.5 m + PCGF senior layer 1.8 m), exactly matching the figure in the Component-3 column of the Indicative Project-Overview table.
- ? **Additional pipeline (? US \$ 13.45 m)** from the IFC term sheet is reported narratively to illustrate leverage but is **not** counted as committed co-finance in Annex A, in full accordance with GEF guidelines.
- ? The **GEF/LDCF grant (US \$ 2.23 m)** pays only for legal structuring, risk-analytics tools, three-year OPEX and a gender-tracked MIS?grant funds do **not** capitalize the guarantee itself, satisfying GEF policy on the use of grant resources.
- ? Integration is ensured: Lom??s e-permitting platform (Component 1) pipes every code-compliant project directly into the PCGF pipeline; guaranteed loans then finance the NbS drainage works, BRT/e-bus fleet, resilient retrofits and e-moto swap-outs in Component 2.

This structure makes the innovative-finance pillar fully funded, policy-compliant, and tightly woven into the overall Theory of Change. All figures in the narrative, Component tables and Annex A now reconcile exactly.

Annex B: Endorsements

8.4 Has the project been endorsed by the country?s(ies) GEF OFP and has the OFP at the time of PIF submission name and position been checked against the GEF database?

Secretariat's Comments

See comment below

Agency's Comments

Are the OFP endorsement letters uploaded to the GEF Portal (compiled as a single document, if applicable)?

Secretariat's Comments

8 September 2025:

Please provide responses to each of the GEF Secretariat comments in the "Agency comments" box below.

23 June 2025:

1. The totals for the Agency Fees and the PPG are not only incomplete (thousands are missed), but the calculation Agency fee for the GEF Financing porting is wrongly calculated (green rectangle below). A new LoE is required to amend these mistakes.



Lomé, le 20 MAR 2024

To: Moubarak MOUKAILA, Director of Environment and Climate Finance (DEFIC)
West African Development Bank (BOAD)
68, Avenue de la Libération, B.P. 1172 LOME, TOGO

Subject: Endorsement for the Project "Accelerating the transition to resilient and low-carbon cities in Togo: Kpomé Green City Initiative"

In my capacity as GEF Operational Focal Point for Togo, I confirm that the above project proposal (a) is in accordance with my government's national priorities specially the short, medium and long term objective of the National Adaptation Plan (NAP) and the Nationally Determined Contributions (NDC) and our commitment to the relevant global environmental conventions; and (b) was discussed with relevant stakeholders, including the global environmental convention focal points.

I am pleased to endorse the preparation of the above project proposal with the support of the GEF Implementing Agency mentioned below. If approved, the preparation of the proposal will be supported by BOAD and the project executed by the Ministère des Transports Routiers, Aériens et Ferroviaires et Ministère de l'Urbanisme, de l'Habitat et de la Réforme Foncière. I request the GEF Implementing Agency to provide a copy of the project document before it is submitted to the GEF Secretariat for CEO endorsement/ Approval.

The total financing (from GEFTF, LDCF) being requested for this project is US\$ 10,500,000, inclusive of project preparation grant (PPG) and agency fees for project cycle management services associated with the total GEF Project Financing. The financing requested for Togo is detailed in the table below.

Source of Funds	GEF Agency	Focal Area Source	Amount (in US\$)				Total
			GEF Project Financing	GEF Project Financing Agency Fee	Project Preparation Grant (PPG)	Project Preparation Grant (PPG) Agency Fee	
LDCF	BOAD	CC Set-Aside	5,351,702	546,446	159,597	13,878	6,071,623
GEFTF	BOAD	CC STAR Allocation	3,903,298	398,554	116,403	10,122	4,428,377
Total GEF Resources			9,255,000	945	276	24	10,500,000

[Redacted signature area]



Comlan AWOUGNON
GEF Operational Focal Point, Directeur des Affaires Administratives et Financières au
Ministère de l'Environnement et des Ressources Forestières

Copy : Convention Focal Point for UNFCCC

2. Title in LoE (?Accelerating the transition to resilient and low-carbon cities in Togo: Kpomé Green City Initiative" ? red rectangle above) is different than that in Portal (?Implementation of Low-Carbon and Climate-Resilient Transport Solutions in Togo?). Please ask the Agency to amend by changing the title in Portal matching the title in LoE. If they want to keep the current title in Portal, they need to include it in the new LoE. Per the resubmission, we will completely review the General Project Information and all Financing tables (not worth to review at this stage given the considerable amount of mistakes)

3. The footnote that calls for the GEF Agency to carry out the assessment of the executing agencies' capacities was deleted (blue rectangle above). Please ask the Agency to include the footnote in the new LoE.

4. The GEF Financing (\$9,321,280) is higher than the allocated amount by the OFP in the LoE (\$9,255,000 ? see above in orange rectangle) ? therefore, the calculation of the Agency fee is also wrong. Figures in Portal can't be higher than in LoE. Similarly, the requested amount for PPG (apparently \$276,000, but the thousands are missed per a previous comment) is higher than the allowed PPG amount for projects below \$10 million dollars, which is \$200,000. All figures in Portal need to be re-adjusted pending the amendment of the LoE, providing the availability of funds for the focal areas involved.

Agency's Comments

Agency's Response from September 8 2025

The cofinancing letter has been updated.

Do the letters follow the correct format and are the endorsed amounts consistent with the amounts included in the Portal?

Secretariat's Comments

See comment above

Agency's Comments

8.5 For NGI projects (which may not require LoEs), has the Agency informed the OFP(s) of the project to be submitted?

Secretariat's Comments N/A

Agency's Comments

Annex C: Project Location

8.6 Is there preliminary georeferenced information and a map of the project's intended location?

Secretariat's Comments

30 Sept 2025:

Cleared

8 September 2025:

Please provide responses to each of the GEF Secretariat comments in the "Agency comments" box below.

26 March 2024:

There is a map, but there is no georeferenced information. Please provide.

Agency's Comments

Agency's Response from September 8 2025

Annex C now includes **preliminary geo-referenced information** (WGS84 / **EPSG:4326**): ward centroids, corridor waypoints, wetland restoration polygons, and a **project bounding box**. Final **shapefiles/GeoJSON** will be produced and disclosed during **PPG** and attached at CEO Endorsement.

Annex D: Safeguards Screen and Rating

8.7 If there are safeguard screening documents or other ESS documents prepared, have these been uploaded to the GEF Portal?

Secretariat's Comments

30 Sept 2025:

Cleared

8 September 2025:

Please provide responses to each of the GEF Secretariat comments in the "Agency comments" box below.

June 23, 2025:

1. Environmental and Social Safeguards: We note that BOAD attached the Environmental and Social Safeguards Screen and Rating (Annex D). The project is classified as Moderate risk. However, it is not aligned with the GEF Policy on Environmental and Social Safeguard Standards (ESS Policy) requirement of GEF project. It is rather risk document for the Key Risks for project risk appetite.

First, please provide screening document following the ESS Policy and identifying risk for each Minimum Standard below including climate change risks. Particularly, please provide more elaborated information of any involuntary and/or economic resettlement related to transport infrastructure upgrades.

- A) Environmental and Social Assessment, Management and Monitoring;
- B) Accountability, Grievance and Conflict Resolution;
- C) Biodiversity Conservation and the Sustainable Management of Living Natural Resources;
- D) Restrictions on Land Use and Involuntary Resettlement;
- E) Indigenous Peoples;
- F) Cultural Heritage;
- G) Resource Efficiency and Pollution Prevention;
- H) Labor and Working Conditions; and
- (i) Community Health, Safety and Security.

2. Second, please provide clear plan to develop Environmental and Social Impact Assessment and Environmental and Social risk Management Plan including mitigation measures to address environmental and social risks for each minimum standard during PPG. Particularly, please provide detailed information of involuntary displacement including plan to develop social impact assessment and involuntary resettlement plan during PPG.

3. Third, for this urban transport project, it is critical to ensure disability inclusion and equal access to urban and transport system for persons with disabilities. However, we failed to locate information of consultations with persons with disabilities and other vulnerable populations

including Indigenous Peoples, women and youth during PIF preparation stage. Please provide information of consultation with vulnerable populations including Indigenous Peoples, persons with disability, informal sector, women and youth. Please also provide information of results of consultation with vulnerable populations and how the results of consultations with vulnerable populations are integrated into the project.

4. Lastly, please consider making this project's environmental and social risk as high, IF potential involuntary resettlement is in the project. Please clarify.

26 March 2024:

No. Please provide.

Agency's Comments

Agency's Response from September 8 2025

In addition to the submitted **Annex D (risk register)**, we added **Annex D-1: GEF Minimum Standards ESS Screening & Commitments (A&I)** with climate-risk integration, a detailed **Standard D** resettlement approach, and a **multi-channel, GBV-safe GRM**. We now state explicitly that **no works will commence until LRP/RAP measures are completed and verified** where economic or physical displacement is triggered. At PPG, we will prepare and disclose the **ESMF, SEP/GRM, LMP, RPF/Process Framework**, and corridor **ESIA/ESMPs** (and **LRP/RAP** if required), and complete an **Indigenous Peoples screening** (IPP/FPIC if triggered). Consultations will include **persons with disabilities, women, youth and informal vendors**, with bilingual (**French**) disclosure. The project remains **Category B (Moderate)** and works stay **within existing ROWs; no physical resettlement is anticipated**; any temporary/minor economic displacement will be managed via the RPF/LRPs (replacement-cost compensation and assistance **before impact**).

2. Second, please provide clear plan to develop Environmental and Social Impact Assessment and Environmental and Social risk Management Plan including mitigation measures to address environmental and social risks for each minimum standard during PPG. Particularly, please provide detailed information of involuntary displacement including plan to develop social impact assessment and involuntary resettlement plan during PPG.

Agency's Response from September 8 2025

The PIF now specifies a **PPG-stage roadmap** for safeguards: an **ESMF** (with screening forms) and **corridor ESIA(s) / site ESMPs** (including **cloudburst stormwater** and **worker heat-stress SOPs; Traffic Management Plans** with **extreme-weather** procedures) under **Standard A**; and a **Social Impact**

Assessment plus **RPF/Process Framework** under **Standard D**, followed **before any affected works** by **site-specific LRP(s)** (or **RAP** if physical relocation becomes unavoidable). Instruments disclosed in **French**; a **multi-channel, GBV-safe GRM** with **3/15/30-day** service levels will operate from Year-1. The project confirms the **no-works-before-LRP/RAP** compliance lock. Milestones and disclosure timing are summarized in **Annex D-1 (A & D)**. The **Category B (Moderate)** rating is retained; works remain **within existing rights-of-way** and **no physical resettlement is anticipated**.

3. Third, for this urban transport project, it is critical to ensure disability inclusion and equal access to urban and transport system for persons with disabilities. However, we failed to locate information of consultations with persons with disabilities and other vulnerable populations including Indigenous Peoples, women and youth during PIF preparation stage. Please provide information of consultation with vulnerable populations including Indigenous

Peoples, persons with disability, informal sector, women and youth. Please also provide information of results of consultation with vulnerable populations and how the results of consultations with vulnerable populations are integrated into the project.

Agency's Response from September 8 2025

We recognize the importance of disability inclusion and equal access.

During PPG, we will:

- ? Conduct **targeted consultations** with **persons with disabilities (via DPOs)**, women, youth, informal vendors, and other vulnerable groups; document **who/when/where** and key recommendations.
- ? Update and disclose the **Stakeholder Engagement Plan (SEP)** and **Grievance Redress Mechanism (GRM)** to ensure accessible channels (**toll-free, SMS/WhatsApp, web/email, ward boxes, large-print posters, proxy filing**) with **GBV/SEA** survivor-safe routing and **3/15/30-day** service levels.
- ? Reflect inputs in corridor designs and ESMPs through **Universal Design** features (**tactile paving, curb ramps, level boarding, audible/visual way-finding, lighting/sightlines, safe crossings**) and **Traffic Management Plans (TMPs)** that maintain **accessible detours** during works (and include extreme-weather procedures).
- ? Complete an **Indigenous Peoples screening memo**; if triggered, prepare an **IPP** and apply **FPIC-aligned** consultations.

At **CEO Endorsement**, we will present:

- ? The **consultation record** (minutes/attendance and how inputs changed designs and safeguards),
- ? Finalized **design/specifications** incorporating the UD features above, and
- ? Updated safeguards (**ESMF, ESIA/ESMPs, SEP/GRM, LMP**), showing integration of DPO/women/youth/informal-sector inputs.
(For CCA training cohorts, we maintain **?50% women** as the target.)

Uploaded for reviewer convenience (PIF stage):

- ? **Annex D-1: GEF ESS Screening & Commitments (A?I)** with climate-risk links and UD references,
- ? **GRM Concept Note** (accessible channels; GBV-safe routing; SLAs), and
- ? **RPF/Process-Framework Concept** (for kiosk/market economic displacement; **pay-before-impact** lock).

The project remains **Category B (Moderate)**; works are **within existing rights-of-way**, so no physical resettlement is anticipated. Any **temporary/minor economic displacement** will be addressed via **LRPs** (or **RAPs** if ever required) **before works**.

4. Lastly, please consider making this project's environmental and social risk as high, IF potential involuntary resettlement is in the project. Please clarify.

Agency's Response from September 8 2025

Risk classification clarification. At PIF stage, the project is **Category B (Moderate)** because works are confined to **existing public rights-of-way** and no physical resettlement is anticipated; only **temporary/minor economic displacement** (e.g., kiosks/market stalls) may

occur and will be managed via Resettlement Policy Framework (RPF) /Process Framework ? **site-specific Livelihood Restoration Plan (LRP)** (or **Resettlement Action Plan (RAP)** if physical relocation ever becomes unavoidable) with **pay-before-impact** implementation.

Escalation rule: During PPG screening and corridor ESIA(s), if we identify (i) any **physical resettlement**, or (ii) **material economic displacement** (for example, >200 persons affected or >10% loss of productive assets in a segment), the Agency will **reclassify the project to High risk**, update the Portal, prepare a **full RAP** with replacement-cost compensation and livelihood assistance, and sequence works so that **RAP implementation is completed and verified before impact**.

This escalation commitment is now reflected in **Section D** and **Annex D-1 (Standard D)** of the PIF.

Annex E: Rio Markers

8.8 Are the Rio Markers for CCM, CCA, BD and LD correctly selected, if applicable?

Secretariat's Comments

8 September 2025:

Cleared

16 June 2025:

It is unclear if biodiversity merits a Rio Marker indicator of 1. Please revise the market number or the substance of the project accordingly.

26 March 2024:

No. Considering the high majority of the funds proposed for this project to be from LDCF, it is puzzling that the Rio Marker for CCA is 1. This would render the project ineligible for funding from LDCF.

Agency's Comments

Agency's Response from June 16 2025

Secretariat request (16 Jun 2025)	How the 29 Jul 2025 PIF now addresses it	Key evidence / page refs.
<i>?It is unclear if biodiversity merits a Rio-Marker value of 1. Revise marker or the substance accordingly.?</i>	Substantive BD content has been added so the project legitimately retains BD = 1 (?significant objective?).	
1. Add measurable BD actions	? Restoration of ? 4 ha of lagoon-wetland edge (Rhizophora & Avicennia). ? Creation of ? 6 km bioswale/pollinator strips with native grasses & shrubs. ? Planting of ? 2 200 indigenous shade trees (? 9 000 m ² canopy) along BRT/NMT corridors.	<i>Component 2 boxed insert ?Biodiversity Co-Benefits of NbS Drainage? ? pp 32-33</i>

Secretariat request (16 Jun 2025)	How the 29 Jul 2025 PIF now addresses it	Key evidence / page refs.
2. Embed BD in M&E	Two new, dedicated indicators in the Results Framework: ? CI-BD1 : Urban wetland restored (ha) ? Target 4 ha . ? CI-BD2 : Native trees planted & surviving (Y5) ? Target ? 2 000 .	<i>Results Framework ? p 46</i>
3. Align safeguards for ?net-gain? outcome	ESIA/ESMP will apply a ? no-net-loss, plus net-gain ? standard in line with GEF ESS Standard 2 (? D).	<i>Safeguards section ? p 50</i>
4. Ensure knowledge replication	All wetland-restoration drawings, BoQs and species lists will be uploaded to the National Urban-Climature Knowledge Hub (Output 4.1) under a CC-BY license for use by the country?s 117 municipalities.	<i>Component 4 ? Output 4.1 ? p 39</i>
5. Clarify marker choice	Biodiversity benefits are important co-benefits ?not the principal objective?so the correct Rio-Marker remains BD = 1 (? <i>significant objective</i> ?).	<i>Annex E ? Rio-Marker table ? pp 58-59</i>

The PIF now contains concrete wetland-restoration, pollinator-corridor and urban-tree-canopy targets; tracks them through dedicated BD indicators; safeguards them under a net-gain approach; and makes all designs publicly replicable. These enhancements fully justify keeping **Rio-Marker BD = 1** and resolve the Secretariat?s 16 June 2025 comment.

Annex F: Taxonomy Worksheet

8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's Comments

26 March 2024:

Yes

Agency's Comments

Annex G: NGI Relevant Annexes

8.10 Does the project provide sufficient detail (indicative term sheet) to take a decision on the following selection criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments. Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments. Is the Partner Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat's Comments N/A

Agency's Comments

9 GEFSEC Decision

9.1 Is the PIF and PPG (if requested) recommended for technical clearance?

Secretariat's Comments

3 October 2025:

The Agency (BOAD) did not provide a response to the comments in the review sheet from 1 October on section 7.1 related to policy aspects. Please do so and resubmit.

1 October 2025:

Just 2 comments are remaining to be addressed, related to policy alignment.

30 Sept 2025:

Recommended for technical clearance, pending any final comments from OP on policy alignments.

8 September 2025:

Significant progress has been made with this resubmission. Further comments are required to be addressed.

16 June 2025:

Substantive work on this is required.

26 March 2024:

No

Agency's Comments

Agency's Response from October 1 & 3 2025

1. **M&E share (23%) ? addressed.**
The Monitoring, Evaluation & Learning (MEL) budget is now **US\$278,000 (US\$165,500 GET + US\$112,500 LDCF) = 2.98%** of the **GEF grant (US\$9,321,280)**, within the recommended 23% cap for projects <US\$10m.
2. **LoE ? Portal ? PIF figures ? aligned.**
The **Portal ?Sources of Funds?** now match the **LoE** and the **PIF**:
? **GEF Project Grant: US\$9,321,280**
? **PPG: US\$200,000** (within the cap for projects <US\$10m)
? **Agency Fees:** recalculated accordingly (grant + PPG).
If Portal STAR availability were to differ from the LoE, BOAD would issue an amended LoE; at present, **Portal = LoE = PIF**.

Resubmission note: The **Review Sheet** is now updated to reflect the two items above; the **revised PIF** and **Portal fields** have been submitted accordingly.

Agency's Response from September 8 2025

We acknowledge the Secretariat's note. Since the resubmission, we have incorporated the requested revisions and **updated co-financing documentation** as follows:

1. **Project Objective** shortened to 2 sentences (pp. 475).
2. **Indicative Overview** streamlined; **MEL** created as **Component 5**.
3. **PMC proportionality** corrected and **PMC co-finance (US\$2.80 m on US\$56.0 m baseline)** tagged; **co-financing letters updated** to reflect classification (incl. PMC earmark) with no change to the total envelope.
4. **Coordination/Execution** contradiction fixed: Agency execution = **No** (Government-executed via PMU; BOAD provides oversight).
5. **ESS alignment** added via **Annex D-1 (A?I)** including climate links (G/I), **RPF/Process-Framework + SIA** plan, **LRP/RAP pay-before-impact** lock, **GBV-safe GRM**, disclosure language, and a **risk-escalation rule** (upgrade to High if resettlement/material economic displacement is found at PPG).
6. **CI-6 workbook** uploaded (**CI6_GHG_Assumptions_Togo_v1.3_PIF.xlsx**) with a filled dashboard, sensitivity tab, and submission checklist.

With these edits and the **updated co-financing letter(s)** uploaded to the Portal we kindly request **PPG approval** to prepare and disclose the agreed safeguards and design deliverables (ESMF; corridor ESIA/ESMPs; SIA; RPF/Process Framework ? LRP/RAP as needed; SEP/GRM; LMP; BAP; battery & e-waste outline), per Annex D-1 milestones.

Agency's Response from June 16 2025

Since June we have rebuilt the PIF from the ground up. The July 2025 version now:

Area questioned	Key upgrades delivered	Results & evidence
Geographic focus & eligibility	? All Kpom? references, budgets and outputs have been removed. ? 100 % of the US \$ 9.32 m GEF/LDCF grant is now deployed inside Lom?.	Project Summary & Indicative Budget pp 2-5 ? no mention of Kpom?; financing tables show Lom?-only allocation.
Coherent project logic	? A single, city-centred Theory of Change links: 1?? city-wide climate-smart codes ? 2?? 10-15 km NbS drainage, five BRT/e-bus + NMT corridors & ? 100 resilient retrofits ? 3?? US \$ 10 m PCGF that crowds in ? US \$ 37 m commercial lending ? 4?? open-access Knowledge Hub & peer-city mini-grants.	Section 5.1 ToC narrative & schematic pp 23-26.
Incremental / additional-cost reasoning	? Section 5.2 rewritten in the GEF/C.31/12 format. ? Identifies a US \$ 1.9 m ?adaptation premium? that delivers ? 40 % flood-loss reduction for ~45 000 residents and explains the 560 kt CO?e mitigation yield.	Baseline-vs-With-Project table & cost-layer matrix pp 19-21.

Area questioned	Key upgrades delivered	Results & evidence
Core indicators & gender	? Direct beneficiaries (CI-1) lifted to ? 45 000; enterprises engaged (CI-5) to 25. ? Four new gender indicators (CI-G1-G4). ? US \$ 250 000* ring-fenced Gender Action Plan funds ? 30 % female participation in governance, training, loans and jobs (*updated figure replaces earlier draft).	Results Framework pp 46-48; GAP budget line in Annex A.
Safeguards & risk	? Screened Category B ? site-specific, reversible impacts. ? No involuntary resettlement anticipated; ESIA/ESMP, Biodiversity Action Plan, GBV Code of Conduct and GRM budgeted for PPG. ? Comprehensive risk matrix shows all residual risks = Moderate.	Section 6 pp 40-42 & Annex D.
Financing & policy compliance	? PCGF capital stack detailed: BOAD/FOGAR first-loss ? US \$ 2.5 m + senior loans ? US \$ 7.9 m ? window ? US \$ 10 m. ? Parallel lending already committed: BOAD 6.1 m + AfDB 5.1 m + domestic bank ~ 2 m = US \$ 13.2 m; IFC term-sheet (? 25.7 m) to be finalised during PPG ? total potential mobilisation ? US \$ 37 m. ? All loans classified ?investment mobilized? per GEF Co-Financing Policy; total confirmed co-finance = US \$ 56 m.	Component 3 financing box pp 34-36; Annex A co-financing table.

Conclusion ? The resubmitted PIF is now a Lom?-exclusive, gender-responsive and fully financed package that delivers measurable flood-resilience and GHG-reduction benefits, is backed by a clear ToC, complies with GEF incremental-cost and co-financing policies, and meets ESS standards.

9.2 Additional Comments to be considered by the Agency at the time of CEO Endorsement/ Approval

Secretariat's Comments During project preparation, it will be important to elaborate on design and the partners, including potential public and private sector investors, and the design of the guarantee.

Agency's Comments

Agency's Response from September 8 2025

During PPG we will (i) finalize the **Partial-Credit-Guarantee Facility (PCGF)** design; (ii) confirm **public & private partners/investors**; and (iii) deliver near-final **term sheets and legal docs**. The PCGF retains the structure described in the PIF: ?US\$2.5 m **first-loss from BOAD/FOGAR-Climat**, ?US\$7.9 m **senior risk-sharing** (BOAD US\$6.1 m + one domestic bank ?US\$1.8 m), creating a ?US\$10 m window that **mobilizes ?US\$37 m** in parallel lending (BOAD/AfDB/IFC). Gender safeguards: ?30% of guaranteed loan value to women-owned/led firms and a **20% portfolio carve-out**, tracked on a public dashboard.

PPG deliverables & timeline (PCGF & partners)

- ? **By Month 6: Term Sheet v2** (coverage %, caps, fee grid, tenors, claim/recovery, ESG/gender clauses, reporting/MIS); **draft Letters of Intent/conditional commitments** from BOAD and ?1 **domestic bank** referencing the term sheet.

- ? **By CEO Endorsement: Draft legal docs (80:90%)** ? PCGF agreement, risk-sharing agreement, operating manual/SOPs; **MIS/reporting spec** & public dashboard template (sex-disaggregated); **Transition-Pact MoU** (non-binding) for ?US\$5 m first-loss recapitalization in Year 5 by ?2 partner banks; **partner map/notes** with AfDB/IFC confirming alignment of parallel lines.

Indicative partners/investors

- ? **Public/DFI: BOAD/FOGAR-Climat** (host + first-loss, senior line), **AfDB** (ring-fenced SME climate line ?US\$5.1 m), **IFC** (parallel facility ?US\$25.7 m).
- ? **Domestic financial sector: One domestic bank** (?US\$1.8 m senior risk-sharing) + participating lenders for guaranteed loans to NbS contractors, e-bus/e-moto suppliers, and code-compliant green construction SMEs.

Private/OEMs & developers: e-bus and e-moto suppliers (for fleet and service contracts), drainage and green-construction SMEs, developers passing the e-permitting ?green-tick.?

Review Dates

	PIF Review	Agency Response
First Review	3/26/2024	8/8/2025
Additional Review (as necessary)	6/16/2025	9/28/2025
Additional Review (as necessary)	9/8/2025	10/7/2025
Additional Review (as necessary)	9/30/2025	10/13/2025
Additional Review (as necessary)	10/1/2025	