



Republic of Ghana

**MINISTRY OF ROADS AND HIGHWAYS
DEPARTMENT OF FEEDER ROADS**

**DRAFT ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

FOR

**Ghana Market Access and Connectivity Project (GMACP)
(P513708)**

20th April 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The **Republic of Ghana** (the Borrower) is planning to implement the **Ghana Market Access and Connectivity Project** (the Project) with the involvement of the **Department of Feeder Roads (DFR) of the Ministry of Roads and Highways (MRH)**, as set out in the Financing Agreement (“Agreement”). The International Development Association (the Association) has agreed to provide the original financing for the project as set out in the Agreement.
2. The Borrower shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the **Borrower** shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented for the Activities, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreement, the **Borrower** shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the **Borrower**, this ESCP will be revised from time to time if necessary, during the implementation of the Activities, to reflect adaptive management of changes and unforeseen circumstances related to the Activities or in response to assessment of performance of the Activities. In such circumstances, the Association and the **Borrower** agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the **Borrower’s** Representative specified in the Agreement or Director of **Department of Feeder Roads (DFR) under the Ministry of Road and Highways**. The **Borrower** shall promptly disclose the updated ESCP.
5. The subsection on “Indicators for Implementation Readiness” below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the “Timeframe” column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS			
A.	ORGANIZATIONAL STRUCTURE		
	<ul style="list-style-type: none"> a. Establish and maintain Agency Implementation Teams (AITs) at the Ministry of Roads and Highways (MRH) and the Department of Feeder Roads (DFR), both AITs will be coordinated by a Project Coordinator within the Ministry, with qualified staff and adequate resources to manage environmental, social, health, and safety (ESHS) risks and impacts throughout the implementation of the Project. This shared team shall include, at a minimum, one Environmental Specialist, one Social Development Specialist and one GBV/SEA/SH Specialist, with terms of reference acceptable to the World Bank. The roles, responsibilities, and coordination arrangements between the two AITs on ESHS matters shall be clearly defined and documented in a manner acceptable to the World Bank. b. Mobilize additional capacities on GBV/SEA/SH and OHS as needed to respond to evolving project needs c. Through a Memorandum of Understanding (MOU), Enter into collaboration arrangements with the Department of Factories Inspectorate (DFI), Land Valuation Division (LVD) and Environmental Protection Agency (EPA) to manage E&S risks and impacts related to Occupational Health and Safety of the Project. d. Engage a Non-Profit firm to support GRM, SE/SEA/SH operations under the oversight of MRH/DFR. 	<ul style="list-style-type: none"> a. Not later than Project Effective Date and thereafter maintain throughout project implementation b. No later than one month after project effectiveness c. Prior to commencement of civil works. d. Prior to commencement of civil works 	<ul style="list-style-type: none"> The Ministry of Roads and Highways (MRH) / Department of Feeder Roads (DFR) MRH/DFR MRH/DFR, LVD, DFI MRH/DFR

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement the following capacity building measures:</p> <ul style="list-style-type: none"> • Training for all AIT staff on ESS requirements including Occupational Health and Safety, incident/accident reporting, resettlement, GBV-SEA-SH, stakeholder engagements, grievance management, code of conduct and labor requirements • Training for Metropolitan, Municipal and District Assemblies (MMDAs) E&S and Health and Safety staff in participating districts on ESS requirements including Occupational Health and Safety, incident/accident reporting, resettlement, GBV-SEA-SH, stakeholder engagements, grievance management, code of conduct and labor requirements • Training for contractor and supervision firms E&S and Health and Safety staff on ESS requirements including Occupational Health and Safety, incident/accident reporting, resettlement, GBV-SEA-SH, stakeholder engagements, grievance management, code of conduct and labor requirements • Training for project workers including contractor workers on their obligations including on labor, code of conduct and SEA-SH 	<p>Prior to commencement of civil works with refresher training/orientation as may be determined during project implementation.</p> <p>Prior to commencement of civil works in the respective districts with refresher training/orientation as may be determined during project implementation.</p> <p>Prior to commencement of activities by the respective supervision and contractor firms with refresher training/orientation as may be determined during project implementation.</p> <p>Prior to commencement of duty by the respective workers with refresher training/orientation as may be determined during project implementation.</p>	<p>MRH/DFR</p> <p>MRH/DFR</p> <p>MRH/DFR</p> <p>MRH/DFR</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Activities. The reports shall include:</p> <ul style="list-style-type: none"> • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • E&S performance of contractors and subcontractors as reported through • Number and status of resolution of incidents and accidents reported under action E below. 	<p>Submit quarterly reports to the Association throughout Project implementation, commencing 90 days after the Effective Date.</p> <p>Submit each report to the Association no later than 30 days after the end of each reporting period.</p>	MRH/DFR
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank.</p>	<p>Submit the monthly reports to the Bank upon request or as annexes to the reports to be submitted under action C above.</p>	MRH/DFR
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Association of any incident or accident relating to the Activities which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p>	MRH/DFR

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>outbreaks. Provide available details of the incident or accident to the Association upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association</p>	<p>MRH/DFR</p>

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MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
<p>1.1 ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <ol style="list-style-type: none"> 1. Prepare and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. The ESMF shall include an annex on management of E&S impacts and Chance Find procedures 2. Prepare and implement site-specific Environmental and Social Impact Assessments (ESIA) or Environmental and Social Management Plans (ESMP) for the project activities in accordance with the procedures and guidance set out in the ESMF and consistent with the relevant ESSs 3. Incorporate the ESMP as part of the respective procurement and bidding documents for the respective project activity that requires the preparation of such ESMP. <p>Prepare and implement Contractor Environmental and Social Management Plans (C-ESMPs), where applicable and consistent with these Ess.</p>	<p>Prior to Appraisal and thereafter implement throughout Project implementation</p> <p>Prior to commencement of the respective Project activity and thereafter implement throughout Project implementation</p> <p>Prior to launching the procurement process for the respective activity.</p> <p>Prior to commencement of the respective Project activity and thereafter implement throughout Project implementation</p>	<p>MRH/DFR</p> <p>MRH/DFR</p> <p>MRH/DFR</p> <p>MRH/DFR and Contractor firms</p>
<p>1.2 MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, ESMP, the Labor Management Procedures, GRM, SEA/SH and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors to the Association.</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided</p>	<p>MRH/DFR</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.3	<p>TECHNICAL ASSISTANCE</p> <ol style="list-style-type: none"> Where necessary, the Borrower shall prepare and publicly disclose a Strategic Environmental and Social Assessment (SESA) for the road fund reform supported under the Technical Assistance component, in accordance with paragraphs 14–18 of ESS1. The SESA shall assess, at a minimum, the downstream E&S implications of the reform on: investment prioritization and effects on environmentally sensitive areas; community livelihoods dependent on road maintenance financing; access and affordability impacts on vulnerable road users including women-headed households and smallholder farmers; and institutional E&S oversight and accountability arrangements in the road sector. The SESA shall be completed and disclosed prior to commencement of the road fund reforms. Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Activities are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference. 	<p>Upon finalization of the road fund reform scope. Completed and disclosed: Prior to commencement of road fund reforms and no later than 3 months after project effectiveness.</p> <p>Throughout implementation of the Activities.</p>	<p>MRH/DFR</p> <p>MRH/DFR</p>
1.4	<p>CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING</p> <p>Prepare CERC activation E&S management procedures as an annex to the project ESMF under 1.1 (1) above.</p> <p>Implement the E&S provisions of the CERC Manual and the CERC ESMF annex in accordance with the ESS and the provisions of this ESCP.</p>	<p>Prior to Effective Date and implemented in accordance with the timeframe specified in the CERC manual</p> <p>In accordance with the timeframe specified in the CERC manual and any assessments and plans required therein</p>	<p>MRH/DFR</p> <p>MRH/DFR</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.5	<p>ASSOCIATED FACILITIES</p> <p>Where identified, cause the owner, and, or, operator of the associated facility if different from the Borrower, to ensure that the activities in the associated facility are carried out in accordance with the applicable requirements of this ESCP and the ESSs</p>	Throughout implementation of the Activities.	MRH/DFR
1.6	<p>USE OF BORROWER ENVIRONMENTAL AND SOCIAL FRAMEWORK</p> <p>Ensure that environmental and social assessment under 1.1 above is consistent with Environmental Assessment Regulation (LI 1652) and assessment for displacement impacts under 5.1 is consistent with Ghana Land Act 2020 (Act 1036) and the ESCP and the applicable laws, regulations, procedures, and implementation capacity.</p>	Throughout Project implementation	MRH/DFR
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Prepare and implement the Labor Management Procedures (LMP) for the Project</p>	No later than the Effective Date and thereafter implement the LMP throughout Project implementation	MRH/DFR
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</p> <p>Prepare and implement an OHS Management Plan to assess and manage the OHS risks and impacts of the Project consistent with the ESMF and subsequent site-specific ESMPs, throughout project implementation.</p> <p>Require contractors and subcontractors to prepare and implement OHS Management Measures as part of the Contractor's Environmental and Social Management Plans (CESMP) in accordance with the Project's Environmental and Social Management Plan (ESMP).</p>	<p>Prior to Contracts awards and commencement of civil works and thereafter implement the plan throughout Project implementation period.</p> <p>Prior to commencement of civil works and thereafter implement the plan throughout Project implementation period.</p>	<p>MRH/DFR</p> <p>Contractor firms</p>
2.3	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation period.	MRH/DFR and Contractor Firms

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Prepare and implement a Waste Management Plan (WMP), as part of the ESMP prepared for the Project, to manage hazardous and non-hazardous waste, consistent with ESS3.</p>	Prior to bidding for Contractor firms and thereafter implement the WMP throughout Project implementation.	MRH/DFR and Contractor Firms
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action [1.1] above, and as follows,</p> <ul style="list-style-type: none"> • Include measures based on the World Bank Group EHS Guidelines. • Ensure that these measures are detailed in Contractor’s Environmental and Social Management Plans (C-ESMPs) to be prepared during project implementation as necessary. <p>Ensure all service providers have environmental and social requirements written into their contracts, including the safe handling, storage, and disposal of hazardous substances</p>	Same timeframe as for the preparation and implementation of the ESMP.	MRH/DFR and Contractor Firms
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action [1.1] above.</p>	Same timeframe as for the preparation and implementation of the ESMP.	MRH/DFR and Contractor Firms

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, risks of labor influx, potential risk of disease spread such as HIV/AIDS and STDs, traffic safety risks arising from the movement of construction vehicles and equipment, increased road traffic, and associated hazards to pedestrians, cyclists, and other road users in and around Project areas, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</p>	Same timeframe as for the preparation and implementation of the ESMPs.	MRH/DFR
4.3	<p>SEA AND SH RISKS</p> <p>Prepare and implement a SEA/SH Response Plan as part of the ESMF and subsequent ESMPs, to assess and manage the risks of SEA and SH associated with Project activities, labor influx, and worker-community interactions, and ensure that appropriate prevention, reporting, and response mechanisms are in place throughout Project implementation.</p>	No later than the Effective Date and thereafter implement the SEA-SH Response Plan throughout Project implementation	MRH/DFR
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT FRAMEWORKS AND PLANS</p> <p>Prepare and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.</p>	Prior to Appraisal and thereafter implement throughout Project implementation	MRH/DFR

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Prepare and implement Resettlement Action Plan (RAP) for each activity under the Project for which such RAP is required, as set out in the RPF and consistent with ESS5.	Prepare and implement the respective RAP prior to carrying out the relevant civil works, including ensuring that before taking possession of the land and related assets, full compensation has been provided and, as applicable, displaced people have been resettled and moving allowances have been provided.	MRH/DFR
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <ol style="list-style-type: none"> 1. Screen all candidate sites early against ESS6 to identify sensitivities (critical habitats, KBAs, ecological corridors) and use results to scope the ESA and inform preliminary design and mitigation. 2. Integrate ESS6 into site selection/Project Site: apply standardized screening checklists, use spatial biodiversity layers, and trigger targeted biodiversity assessments where risks are identified. 3. Apply the mitigation hierarchy: prioritize avoidance (including avoiding critical habitats where feasible), then minimize impacts through measures such as timing works to reduce disturbance, and restore affected areas as needed. Biodiversity offsets are explicitly excluded as a mitigation option under this Project and will not be considered at any stage of implementation. 4. Prepare site-specific ESMPs/Biodiversity measures; include ESS6 requirements in bidding documents; finalize ESMPs/BMPs before mobilization; implement and monitor during construction; restore post-construction. 	<p>Screen all candidate sites early against ESS6 to identify sensitivities (critical habitats, KBAs, ecological corridors) and use results to scope the ESA and inform preliminary design.</p> <p>Include ESS6 requirements in bidding documents; finalize ESMPs/BMPs before mobilization; implement and monitor during construction; restore post-construction.</p>	MRH/DFR and Contractor firms

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES		
7.1	No groups or communities identified as Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities have been found within the project area of the Project. As such, no specific mitigation measures are required under Environmental and Social Standard 7 (ESS7) for this Project. However, if such groups are identified during Project implementation, the Recipient commits to applying the provisions of ESS7, including conducting the necessary assessments, consultations, and developing and implementing mitigation measures to ensure the protection of their rights, culture, and livelihoods. Continuous monitoring will be conducted to ensure compliance with ESS7 throughout the Project's lifecycle.	
ESS 8: CULTURAL HERITAGE		
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Prepare and implement a Cultural Heritage Management Plan (CHMP) as part of the ESMP, consistent with ESS8.	Same timeframe as for the preparation and implementation of the ESMPs
8.2	CHANCE FINDS Describe and implement the chance finds procedures as part of the ESMP of the Project.	Same timeframe as for the preparation and implementation of the ESMPs
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]		
9.1	ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS) The Project does not involve the use of Financial Intermediaries (FIs). Therefore, no specific mitigation measures are required under Environmental and Social Standard 9 (ESS9) for this Project. However, should the involvement of Financial Intermediaries become necessary during Project implementation, the Recipient commits to ensuring full compliance with ESS9, including conducting appropriate risk assessments and implementing the necessary measures to manage the environmental and social risks associated with such intermediaries.	
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		
10.1	STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE Prepare and implement a Stakeholder Engagement Plan (SEP) for the project consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	Prior to Appraisal and thereafter implement the SEP throughout Project implementation
DFR		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Activities, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all parties affected by the Activities, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	Establish the grievance mechanism 30 days after Effective Date and thereafter maintain and operate the mechanism throughout Project implementation.	DFR

INDICATORS FOR IMPLEMENTATION READINESS	
<p>The following actions are indicators for implementation readiness:</p> <p>A.</p>	<ul style="list-style-type: none"> i. MRH and DFR AITs operational ii. Social Expert onboard iii. GBV/SEA/SH Specialist onboard
<p>B.</p>	<ul style="list-style-type: none"> i. AITs staff trained on E&S requirements ii. The Grievance and Complaints logging System (GCLS) is updated iii. GRM Actors trained on, but not limited to, MRH's (GCLS), Incident/Accident reporting, iv. Project workers trained on MRH's GCLS, stakeholder mapping and engagement, ESS, emergency preparedness and response, community health and safety
<p>C</p>	<ul style="list-style-type: none"> i. E&S instruments prepared, consulted, disclosed (site-specific instruments before the commencement of civil works for the relevant package)

	<ul style="list-style-type: none">ii. Environmental and Social Screening /Assessments to be prepared by the Borrower at the onset of implementationiii. E&S Monitoring and Reporting Templates
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