



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

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

**FOR**

**Preparation Grant for Ghana Market Access and Connectivity  
(P513708)**

**Dated: 15<sup>TH</sup> DECEMBER 2025**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The **Republic of Ghana** (the Recipient) is planning to implement certain activities (the Activities) for the preparation of the proposed **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)**, for which it has requested a preparation grant, as set out in the Letter Agreement (“Agreement”). The International Development Association (the Association) has agreed to provide the PPG to finance activities (the Activities) related to the preparation of the Project, as set out in the referred agreement.
2. The Recipient shall ensure that the Activities are 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 Recipient 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 Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, 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 Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient’s Representative specified in the Agreement or Director of **Department of Feeder Roads (DFR)**. The Recipient shall promptly disclose the updated ESCP

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS			
A.	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain a Project Implementing Unit (PIU) with qualified staff and resources to support management of environmental, social, health and safety (E&amp;S) risks and impacts of the Activities including environmental specialist and a social specialist, a stakeholder engagement specialist</p>	Establish a PIU and appoint the environmental and social specialist no later than two months of grant signing, and thereafter maintain the PIU and these positions throughout the Activities implementation	Department of Feeder Roads
MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p><b>REGULAR REPORTING</b></p> <p>If so requested by the Association, prepare and submit to the Association monitoring reports on the environmental, social, health and safety (ESHS) performance of the Activities, including but not limited to the implementation of the ESCP, status of E&amp;S instruments under preparation, stakeholder engagement activities, log and status of any complaints received.</p>	Submit quarterly reports to the Association during implementation of the Activities, commencing after the Effective Date. Submit each report to the Association no later than 45 days after the end of each reporting period within the time frame and covering the period requested by the Association	Department of Feeder Roads
B	<p><b>INCIDENTS AND ACCIDENTS</b></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 outbreaks. Provide available details of the incident or accident to the Association upon request. Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes.</p> <p>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>Notify the Association no later than 48 hours after learning of the incident or accident.</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>	Department of Feeder Roads

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.2	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Activities [preparation of the Environmental and Social Management Framework (ESMF), Resettlement Framework (RF), Stakeholders Engagement Plan (SEP), Labor Management Procedures (LMP) and the Environmental and Social Commitment Plan (ESCP) 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>	Throughout implementation of the Activities.	Department of Feeder Roads
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Ensure that workers are engaged in the implementation of the Activities consistent with ESS2.</p> <p>To this end, ensure that the following measures are carried out:</p> <ul style="list-style-type: none"> <li>a) Provide workers with information and documentation that is clear and understandable regarding their terms and conditions of employment through written contracts setting out their rights, including, inter alia, rights related to hours of work, wages, overtime, compensation and benefits, as well as written notice of termination of employment, and details of severance payments, as applicable</li> <li>b) Implement occupational health and safety (including personal protective equipment, and emergency preparedness and response) measures, taking into account the General Environmental, Health and Safety Guidelines (EHSGs), and other relevant Good International Industry Practice (GIIP) and, as appropriate, the industry-specific EHSGs and other Good International Industry Practice (GIIP)</li> </ul>	Carry out the measures throughout the implementation of the Activities	Department of Feeder Roads

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>c) Implement measures, as applicable, to, inter alia: (i) prevent the use of all forms of forced labor and child labor; (ii) enable workers to benefit from, inter alia, access to grievance and redress mechanisms without fear of retaliation; and effective freedom to form and join workers organizations or alternative mechanisms for expressing their concerns and protect their rights related to labor and working conditions;</p> <p>d) Develop a code of conduct for workers, which shall include measures to prevent and respond to SEA and SH cases;</p> <p>Incorporate the relevant requirements above in the ESHS specifications of the procurement documents and contracts with third parties that engage workers in the implementation of the Activities.</p>	Carry out the measures throughout the implementation of the Activities	Department of Feeder Roads
<b>ESS 3 to ESS9</b>			
3	Relevant aspects of these standards shall be considered in the technical assistance activities under action 1.2. above, as relevant.	Same timeframe as for action 1.2.	Department of Feeder Roads
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b></p> <p>Incorporate stakeholder engagement and information disclosure measures in the implementation of the Activities, in a manner consistent with ESS10.</p> <p>To this end, ensure that the following measures are implemented:</p> <p>a) Provide stakeholders with information about the environmental and social risks and impacts of the Activities in a timely, understandable, accessible and appropriate manner and format, including but not limited to any environmental and social instruments prepared as part of the Activities [consider specifying where such information shall be available e.g. Activities sites, government offices, websites, etc.];</p>	Implement the stakeholder engagement activities throughout the implementation of the Activities.	Department of Feeder Roads

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>b) Consult stakeholders in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation, including with regards to any environmental and social instruments prepared as part of the Activities;</p> <p>Document the stakeholder engagement activities, including: (i) stakeholder mapping; (ii) description of consultations and participation mechanisms utilized, and records of meetings held; (ii) feedback received and responses to said feedback; and (iv) measures to engage stakeholders who, because of their particular circumstances, may be disadvantaged or vulnerable;</p>	Implement the stakeholder engagement activities throughout the implementation of the Activities.	Department of Feeder Roads
10.2	<p><b>GRIEVANCE MANAGEMENT</b></p> <p>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>	Throughout implementation of the Activities.	Department of Feeder Roads
<b>11: Exclusion List for TA Grant (Ineligible Activities)</b>			
	<p>The grant shall not finance:</p> <p>(a) any civil/physical works (new construction, rehabilitation, expansion, demolition, excavation, site clearance, earth moving, installation of infrastructure);</p> <p>(b) any activity requiring land acquisition or land use restrictions, or causing physical/economic displacement (ESS5);</p> <p>(c) procurement of construction materials/equipment intended for civil works (cement, aggregates, asphalt, steel, heavy machinery);</p>	<p>Maintain and apply throughout of the Activities implementation.</p> <p>This exclusion list should be included in Operations Manual and TA ToRs before any TA activity is initiated</p>	Department of Feeder Roads

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<ul style="list-style-type: none"> <li>(d) activities in or affecting critical habitats or protected areas, or causing significant adverse impacts on biodiversity or ecosystem services (ESS6);</li> <li>(e) activities categorized as High risk under the ESF or likely to cause long-term, permanent, or irreversible impacts;</li> <li>(f) production, trade, procurement, or use of internationally banned or highly hazardous substances (e.g., certain pesticides, asbestos) or technologies that discharge polluted effluents/emissions beyond national standards or WBG EHS Guidelines (ESS3);</li> <li>(g) activities that could damage cultural heritage (ESS8);</li> <li>(h) activities adversely affecting Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, including resettlement or impacts on customary lands or cultural heritage (ESS7);</li> <li>(i) any use of child labor or forced labor—TA activities must comply with ESS2;</li> <li>(j) activities that would disproportionately affect vulnerable groups or create significant social conflict;</li> <li>(k) funding of religious or political infrastructure, or purchase of military equipment or illicit items.</li> </ul>	<p>Maintain and apply throughout of the Activities implementation.</p> <p>This exclusion list should be included in Operations Manual and TA ToRs before any TA activity is initiated</p>	<p>Department of Feeder Roads</p>