



MINISTRY OF TRANSPORT, RURAL ACCESS, AND FEEDER ROADS
(MTDPR)

Togo Transport Connectivity and Logistics Improvement
Program (SOP1 - P508939)

**Environmental and Social Commitment
Plan (ESCP)**

For negotiations

April 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

1. The Togolese Republic (the "Recipient") will implement the Togo Logistics and Transport Systems Improvement Project (SOP1: P508939) (the "Project"), with the involvement of the Ministry of Transport, Rural Access, and Feeder Roads ("MTDPR"), as set out in the Financing Agreement (the Agreement). The International Development Association (the "Association") has agreed to provide financing for the Project, as specified in the Agreement.
2. The Recipient 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. This 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 Agreement.
3. Without limitation to the foregoing, this ESCP sets out the 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 the grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared, consulted upon, disclosed, and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with the 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 Project implementation, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. 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. The Recipient 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 AND CAPACITY SUPPORT			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain the Project Implementation Support Unit (PISU) with qualified staff to be recruited and sufficient resources to support the management of environmental, social, health and safety (ESHS) risks and impacts, including the SEA/SH aspects of the Project. The PISU will include (i) an environmental specialist, (ii) a social development specialist, gender/SEA/SH specialist to ensure the implementation of the E&S documents prepared as part of the Project.</p> <p>The terms of reference and qualifications of all applicants for a) and b) shall be subject to the Association's No Objection Procedure.</p>	<p>The PISU shall be established before May 4, 2026 – before negotiation.</p> <p>Recruit an Environmental Specialist, a Social Development Specialist, gender/SEA/SH Specialist before May 4, 2026.</p> <p>Maintain the PISU and these positions throughout Project implementation.</p>	<p>Ministry of Transport, Territorial Access, and Rural Roads (MTDPR)</p>
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement a training plan covering: ESF/ESS, LMP/OHS plan, SEA/SH (CoCs, survivor-centered interventions and referral pathways), Project and worker GRM, hazardous waste management (electrical and electronic waste, scrap metal, creosote wood waste, Hydrocarbons and waste oils), chance finds, traffic/road safety, safety management. Provide training for the PISU, contractors, supervisory firms, and the relevant authorities, technical and institutional capacity building of ANGE, and the environmental and gender units of the sectoral ministries on environmental and social issues related to renewable energy, and training of specialists and institutions (project</p>	<p>A training and capacity building plan shall be prepared and implemented within three months after the Effective Date of the Project, and thereafter implemented annually, with updates as needed, throughout Project implementation.</p>	<p>PISU/MTDPR</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>staff and environmental and gender units, etc.) the integration of climate and biodiversity issues during Project implementation.</p> <p>Training on labor and working conditions</p> <ul style="list-style-type: none"> • Conditions of employment under national labor law • Code of conduct for suppliers / service providers and subcontractors; workers' organizations; • Rules on child labor and minimum working age; • Workers' rights; • Worker complaints and SEA / SH complaints • Discrimination and harassment (SEA / SH) / incidence at work. 		
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 (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities carried out per the Stakeholder Engagement Plan (SEP), the operationalization of the grievance mechanism, including provisions for handling allegations of Sexual Exploitation and Abuse/Sexual Harassment-Violence Against Children (SEA/SH-VAC) , E&S performance of contractors and subcontractors as reported through contractors' and supervision firms' reports, number and status of resolution of incidents and accidents reported under action E below.</p>	<p>Submit quarterly reports to the Association throughout Project implementation, starting from the Effective Date. Submit each report to the Association no later than 10 days after the end of each reporting period.</p>	PISU
D	CONTRACTORS' MONTHLY REPORTS		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Under contractor and supplier contracts, require contractors and suppliers to provide the PISU with monthly site monitoring reports on environmental, social, health and safety aspects. These monthly reports shall be provided to the Association by the Recipient upon the Association's request.	Require the submission of the monthly reports upon signing of contracts and throughout the duration of sub-project works. Submit the monthly reports to the Association upon the Association's request.	PISU Contractor Consultant
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse impact on the environment, the affected communities, the public or Project 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; 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.</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>Notify the Association no later than 48 hours after learning of the incident or accident. Provide details available upon request.</p> <p>Submit the review report and the Corrective Action Plan to the Association no later than 10 days after the initial notification, unless the Association agrees to a different timeframe in writing.</p> <p>Ensure the provision of assistance to survivors of SEA/SH for medical care, psychosocial support in the Project area.</p>	PISU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		Reporting of SEA/SH cases shall be based on the principle of confidentiality and security of the identity of the survivor and should be kept in a secure location with limited access.	
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLAN</p> <p>1- Refer to the ESMFs prepared during last years, including those from ongoing Bank-financed projects (such as Western and Central Africa, LON Economic Corridor, P168386), to guide E&S requirements of the project Prepare and implement an Environmental and Social Impact Assessment (ESIA) and corresponding Environmental and Social Management Plan (ESMP) for railway, rural and national roads sub-projects, as well as ESMPs for sub-projects not subject to ESIA , consistent with the relevant ESSs.</p> <p>2 - Prepare and implement the fcorresponding E&S site-specific tools and instruments for the Project, in accordance with the relevant ESSs and the Environmental, Health and Safety Guidelines (EHSg).</p>	<p>1- Refer to the existing ESMF of LON project to guide implementation of E&S requirements, from effective date and throughout Project implementation.</p> <p>Adopt the ESIA before the start of any activity requiring the preparation of such an instrument, and thereafter implement the ESIA throughout Project implementation.</p> <p>2- E&S Site-specific instruments shall be prepared, disclosed, consulted upon, and adopted prior to the commencement</p>	PISU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	3- Ensure that the implementing agencies, contractors, sub-contractors and control offices involved in the sub-projects prepare and implement the sub-project site-specific ESIA and ESMP	<p>of any activity requiring the development of such an instrument. All these instruments shall be implemented throughout Project implementation.</p> <p>3. Adopt the ESIA before launching the bidding process for sub-projects/activities that require the adoption of an ESIA. Once adopted, implement the relevant ESIA throughout Project implementation.</p>	
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of this ESCP, including relevant E&S and safety documents and/or plans, as well as the LMP, into the Environmental-Social-Health and Safety (ESHS) specifications of the procurement documents and contracts with contractors and supervision engineers.</p> <p>Ensure that contractors and supervising firms (i) comply with the ESHS specifications of their respective contracts, and (ii) ensure that they require their subcontractors to comply with the ESHS specifications of their respective contracts in accordance with the management tools and</p>	<p>During the preparation of the procurement documents and before the contract is signed and the actual start of the services or works concerned.</p> <p>Implementation and maintenance of these measures throughout Project implementation.</p> <p>Supervise contractors and consulting engineers</p>	PISU Contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	instruments. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.	throughout Project implementation. Copies of relevant contracts provided to the Association upon request.	
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Carry out consultations, studies, capacity and skills building, training and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Association, consistent with the ESS relevant to the Project, and thereafter, prepare and finalize the results of such activities in accordance with the terms of reference.</p> <p>Thereafter ensure that all outputs of technical assistance activities are consistent with the relevant ESSs and comply with the terms of reference .</p>	Throughout Project implementation	PISU
1.4	<p>CONTINGENT EMERGENCY RESPONSE FINANCING</p> <p>a) Ensure that the Contingent Emergency Response Component (CERC) Operations Manual includes a description of the ESHS assessment and management arrangements for the implementation of the CERC in accordance with the ESSs.</p>	<p>a) The adoption of the CERC Operations Manual in form and substance acceptable to the Association is a withdrawal condition under Section III of Schedule 2 of the Financing Agreement for the Project.</p> <p>b) Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in</p>	PISU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	b) Adopt any environmental and social (E&S) instruments which may be required for activities under the CERC of the Project, in accordance with the CERC Operations Manual and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments	any case, before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Prepare and implement the LMP for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health, and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.	The LMP shall be prepared and adopted prior to the recruitment of any Project workers or commencement of project activities (whichever is earlier), and shall be implemented throughout Project implementation.	PISU
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN Prepare and implement the Occupational Health and Safety (OHS) Management Plan specified in the ESIA to assess and manage the risks and impacts of the Project in relation to occupational health and safety and ensure that Project contractors develop and implement an OHS plan, all in accordance with ESS2 and in a manner acceptable to the Association.	The OHS management plan shall be prepared before the start of works and shall be implemented throughout Project implementation.	PISU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
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.	PISU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Prepare and implement waste management measures/plans, within the framework of the ESIA, to manage hazardous and non-hazardous wastes, consistent with ESS3.</p> <p>Implement Pest management plans (PMP) prepared under FSRP and ProMAT projects to manage the risk of pollution/contamination from chemical products as well as their associated waste, where there is a construction/rehabilitation of road to access agropoles and productive agricultural zones</p>	<p>Adopt the waste management measures/plans before the start of work and thereafter implement these measures/plans throughout Project implementation.</p> <p>Prior to the start of works in the agropoles and productive agricultural zones and thereafter implement these plans throughout Project implementation</p>	PISU Contractor
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures (rationalize the use of raw materials, energy and water and the maintenance of their quality) in the ESIA to be prepared</p>	Prior to commencement of work and implemented and maintained throughout Project implementation.	PISU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	under action 1.1 above. Water management plan (WMP) shall be required where surface water will be used for rural road rehabilitation/construction.		
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Develop, adopt and implement measures and actions to assess and manage traffic and road safety risks (including, inter alia, a traffic and road safety plan, including a traffic plan for construction equipment and diversion routes), in accordance with the requirements of ESS4. Incorporate measures to manage traffic and road safety risks as required in the ESIA to be prepared under action 1.1 above	Prior to commencement of works and throughout Project implementation.	PISU Contractor Supervising Consultant
4.2	COMMUNITY HEALTH AND SAFETY Develop, adopt and implement measures and actions to assess and manage Project-related risks and impacts in accordance with the requirements of ESS4, as part of ESIA, and in a manner acceptable to the Association.	Before the project related civil works begin. These measures shall be maintained throughout Project implementation.	PISU Contractor Supervising Consultant
4.3	SEA AND SH RISKS Adopt and implement measures contained in the site-specific ESIA's to assess, manage and mitigate SEA/SH risks.	Before the start of relevant work and thereafter implement measures throughout the implementation of the Project.	PISU Contractor Supervising Consultant
4.4	SECURITY MANAGEMENT	Before the effective start of activities in the savannah	PISU Contractor

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Prepare, adopt and implement a stand-alone Security Management Plan (SMP), based on the Security Risk Assessment (SRA) in accordance with the requirements of ESS 4, in a manner acceptable to the Association.	region and thereafter implement measures throughout the implementation of the Project.	Supervising Consultant
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY			
5.1	<p>RESETTLEMENT PLANS</p> <p>(1) Prepare and implement resettlement plans (RPs) including livelihood restoration plans (LRPs) for the Project activities under components 1, 2, 3, in accordance with ESS5.</p> <p>(2) No right-of-way clearance or any form of taking of land shall commence prior to the preparation and implementation of the RAP in accordance with the requirements of ESS5.</p> <p>(3) Carry out an audit of the right-of-way clearance activities conducted in November 2025, in accordance with Terms of Reference acceptable to the Association, and implement the audit recommendations to ensure compliance with ESS5.</p> <p>(4) Commission an external resettlement completion evaluation, in line with paragraph 24 of ESS5, to assess the implementation of the RAPs and audit recommendations.</p>	<p>(1) Prepare and implement the respective RP or LRP prior to carrying out the relevant 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.</p> <p>(2) Throughout Project implementation.</p> <p>(3) Complete the audit report within six months after the Effective Date of the Project. The audit report</p>	<p>PISU Expropriation Commission (COMEX) housed within the Ministry in charge of Finance.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		<p>shall clearly delineate the sections where pre-emptive right-of-way clearance has been undertaken. All recommendations arising from the audit that are applicable to such sections shall be fully implemented prior to the commencement of any works therein. Authorization to proceed shall be contingent upon the issuance of the Association's formal no-objection, based on verifiable evidence, satisfactory to the Association, demonstrating that the aforementioned recommendations have been duly implemented.</p> <p>(4) after RAPs and audit recommendations have been substantially completed.</p>	
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Carry out a Critical Habitat Assessment as part of the ESIA of works in or around protected areas (or standalone abbreviated CHA where the ESIA is not yet to be prepared), and adopt and implement biodiversity</p>	<p>Prior to the commencement of Project related civil works and throughout Project implementation.</p>	PISU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	management measures (as part of the relevant ESIA or a standalone Biodiversity Management Plan when the assessment so warrants) consistent with ESS6.		Consultants
ESS 7: INDIGENOUS PEOPLE/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Not relevant		
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Prepare and implement cultural heritage management measures in accordance with the guidelines of the ESIA prepared for the Project, and consistent with ESS8.	Before the start of civil works and thereafter implement throughout the Project implementation.	PISU Contractors
8.2	CHANCE FINDS Describe and implement the chance finds procedures in the ESIA. "Chance finds" clauses shall be included in all contracts for works, even in cases where the probability is very low. Include in the ESIA a procedure in case of "chance finds" of cultural relics, a section on cultural heritage in accordance with national legislation and the practices of the ministry in charge of culture, and consistent with the requirements of ESS 8.	Before the start of civil works and throughout Project implementation.	PISU
ESS 9: FINANCIAL INTERMEDIARIES			
	Not relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION	The SEP was disclosed on April 23, 2026. The SEP shall thereafter be	PISU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Prepare and implement a Stakeholder Engagement Plan (SEP) for the Project that includes measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult in a culturally appropriate manner, free from manipulation, interference, coercion, discrimination and intimidation, all in accordance with ESS10 and in a manner acceptable to the Association.	implemented throughout Project implementation.	
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, disclose, maintain and operate an accessible grievance mechanism (GRM), to receive and facilitate resolution of concerns and grievances related to the overall Project, promptly and effectively, in a manner that is transparent, culturally appropriate and readily accessible through multiple channels (telephone, focal points, communities) for all project-affected parties, at no cost and without retribution, including concerns and complaints filed anonymously, all in accordance with ESS10.</p> <p>The GRM shall be equipped to receive, register, and address SEA/SH-related concerns and complaints in a safe and confidential manner, with specific entry points for survivors and ensure a referral system to provide assistance to survivors as needed, through GBV service providers identified in the Project area, all in a safe, confidential, and survivor-centered manner.</p> <p>The GRM shall rely on a communication plan to ensure that the local populations affected by the Project are aware of the mechanism and the procedures for submitting and addressing complaints and other recourse.</p>	The GRM shall be operational no later than four (4) months after the Effective Date of the Project and thereafter be maintained and operated throughout Project implementation. In the interim, the existing GRM (supplemented by project specific channels – email, focal point) shall be supplemented by interim channels while the operationalization of the formal GRM is pending.	PISU Psychosocial and legal support centers NGO
INDICATORS FOR IMPLEMENTATION READINESS			
The following are indicators of implementation readiness:			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>A: Establishment of the PISU before the Effective Date of the Project;</p> <p>B: Prepare and implement a training and capacity building plan three months after the Effective Date of the Project, and thereafter, annually, with updates as needed, throughout Project implementation;</p> <p>10.2: Make the GRM operational no later than four (04) months after the Effective Date of the Project.</p>		