



# Concept Environmental and Social Review Summary

## Concept Stage

### **(ESRS Concept Stage)**

Date Prepared/Updated: 06/11/2022 | Report No: ESRSC02805



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Ghana	Western and Central Africa	P178767	
Project Name	Kumasi Urban Mobility and Accessibility Project (KUMAP)		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Transport	Investment Project Financing	8/30/2023	12/12/2023
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance	Kumasi Metropolitan Assembly, Department of Urban Roads		

**Proposed Development Objective**

The Project Development Objective is to improve mobility, safety, and accessibility along selected corridors, and improve planning capacity for sustainable urban growth in the Greater Kumasi Metropolitan Area.

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>440.00</b>

**B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?**

No

**C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]**

The proposed BRT based mass transit system in the Greater Kumasi Metropolitan Area(GKMA) is amid to: (i) address urban mobility, connectivity, and accessibility challenges; (ii) decarbonize the urban transport sector to reduce GHG emissions and mitigate/adapt to climate impacts; (iii) ensure an inclusive, equitable and sustainable mobility to all; and (iv) support initiatives and pilots for the digitalization of the sector.

The proposed project will be backed by a solid analytical works supported by World Bank, and other development partners, private lenders and strong government engagement. Areas of particular focus of will be:

- a. Digitalization and scale-up of ongoing “smart city” initiatives,



- b. Decarbonization of the transport sector,
- c. Mobilization of private sector financing for the BRT and other urban mobility infrastructure (terminals, parking, etc.), and enhancing private sector operators,
- d. Development of institutions and human capital,

While the project is proposed as a combination of investments and institutional strengthening activities, the BRT system is expected to be developed and operated through PPP arrangements. With the principles of Complete Street approach, the project would incorporate the provision of safe, convenient, secure access and crossings for pedestrians and improved street lighting that takes into account vulnerable road users. In order to guide future development along the BRT corridor, a Corridor Development Strategy (CDS) will be prepared based on Transit-Oriented Development (TOD) principles, and engaging a diverse group of public, private, and civil society stakeholders. The CDS will establish a common and spatialized high-level vision for future urban growth along the transport corridor aiming to encourage suitable land-use mixes and higher densities of residential and commercial developments, and to promote the creation of attractive and livable places around BRT stations.

The project's total estimated cost is US\$ 440 Million, and financing sources include IDA/IBRD credit in the amount of US\$ 200 million, Government contribution of US\$20 million, and the private sector through PPP arrangements in the amount of US\$ 50 million. Compensations associated to involuntary resettlement, livelihood disruption, and/or revenue loss are expected to be covered by the Government of Ghana (GoG). The project will also aim to leverage funds from other Development Partners such as the AFD, EU under a co/parallel-financing arrangements.

The project is expected to be structured around four components:

Component 1 – Implementation of a BRT system (US\$ 407 million financed by IDA/IBRD with co/parallel financing from other DP and private sector). This component will support the implementation of safe, resilient, green, and integrated mass transit system in selected corridors in the GKMA. This component will include the following activities: (i) Civil works of the main BRT corridor and the planned service routes (feeder and/or other) with environmental and social impact assessment studies for the BRT corridors and service roads as per the ESF guideline, and carrying out detailed designs and construction supervision activities of the roads; (ii) BRT System Development and Operationalization, and includes (a) construction and equipment of BRT facilities (segregated busways, interchange facilities, stations, terminals and depots), (b) provision of Intelligent Transport Systems (ITS); provision of working capital subsidy for the concession of the BRT operation; (c) implementation of social management and impact mitigation measures including the labor redeployment for the affected existing bus operators such as drivers, conductors and route managers; (d) implementation and monitoring of the Social Management Plan including its actions to mitigate gender-based violence and actions to improve women's mobility and economic participation options; and (e) definition and deployment of a stakeholders engagement program and a public relations and media strategy to generate support for and disseminate information on the BRT system.

Component 2 – Public transport industry transition supporting the development of mass transit (US\$ 18.5 million financed by IDA/IBRD). This component will work on ring-fencing the definition and structuring of PPP arrangements for the implementation of a BRT system. The component will support (a) the definition/modernization/reform of the existing policy, legal, and regulatory, and institutional frameworks, (b) identification of potential financing mechanisms, and (c) definition of a business plan conducive to boost private sector participation in the rollout of Kumasi's first BRT system. This component will finance: (i) Strengthening of the institutional, regulatory, and governance enabling environments, including institutional development and capacity building at national and GKMA levels; (ii) technical assistances to modernize, harmonize and consolidate the transport sector's management framework in charge of licensing, issuing of permits, regulatory frameworks; (iii) Modernize and build capacity in the traffic police force related to road safety; (iii) transaction advisory for public transport industry transition, which



includes technical support to incumbent operators; and (iv) conduct a financial evaluation and structure a business plan for BRT system operations, and (v) Develop awareness and communication campaigns to ensure users' buy-in; Component 3 – Urban Mobility and Land Use Planning, Institutional Strengthening and Human Capital Development (US\$ 14.5million financed by IDA/IBRD). This component will update and improve the existing planning frameworks in urban mobility and urban development to ensure the sustainable and resilient use of urban land along the selected mass transit corridors, along with institutional strengthening, capacity building and human capital development in urban mobility for the GKMA. This component will finance: (i) urban Mobility Planning in secondary cities, (ii) urban and land use planning to improve synergy between urban planning and land use for maximum efficiency, (iii) Institutional Strengthening and Capacity Building to GKMA's transport sector agencies and stakeholders, and (iv) Human Capital Development. This subcomponent will include technical assistance and training in the transport sector, in collaboration with universities and vocational training institutions, with the objective to develop skills required for existing and future needs of the sector mainstreaming climate change mitigation and adaptation in transport planning and design.

#### **D. Environmental and Social Overview**

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The Kumasi Urban Mobility and Accessibility Project will be implemented in the Greater Kumasi Metropolitan Area (GKMA), an urban and populous area in the Ashanti Region of Ghana. The Greater Kumasi Metropolitan Area comprises the old city (Kumasi Metropolitan) and six adjoining districts—Ejisu-Juabeng, Bosomtwe, Kwabre East, Afigya Kwabre, Atwima Nwabiagya and Atwima Kwanwoma. GKMA is strategically located in south-central Ghana and it is served by five national roads and two inter-regional roads which make it a pivotal point of national and inter-regional transportation, and 13 regional roads connect to Kumasi Metropolitan area. The GKMA covers an area of approximately 2,746 square kilometres and encompasses areas such as Manhyia, Tafo, Suame, Asokwa, Oforikrom, Asawase, Bantama, Kwadaso, Nhyiaeso and Subin. GKMA is characterized by two well defined rainfall seasons, a major season and a minor season. The major rainfall season begins in March and ends in July with the month of June experiencing the highest rainfall in the year. The minor rainfall season commences in September and ends in November, with a peak rainfall in the month of October. The main dry season, having been desiccated by the harmattan wind, occurs from December to March. The annual rainfall with the GKMA ranges between 1600-1700mm. The temperature of the region seems to be uniformly high throughout the year with a mean temperature of about 24°C. The highest average temperature recorded in the region is 30.5°C and this is recorded normally in February, just before the major wet season. The minimum temperature is usually recorded during the minor wet season.

GKMA is faced with several environmental challenges that include pollution of water bodies, poor waste management, risk from chemical use, indoor and outdoor air pollution, and land degradation as well as improper management of large-scale development. Generally, the air quality in Ghana is below the acceptable WHO standards. Toxic smoke from car exhaust emissions (mostly poorly maintained or overaged vehicles) is the major cause of air pollution in Ghana. In urban centres, including GKMA, the exhaust emissions from vehicles are exacerbated by the constant vehicular traffic on most major roads. Air pollution is Ghana's number one environmental risk to public health, and it is the sixth-ranked overall risk (out of 19) for death.



Kumasi is the second largest city and fastest growing big city in Ghana. It hosts a population of over 2 million inhabitants. Between 2010 and 2021 the city recorded an average annual growth rate of about 4%. The city also functions as the commercial and industrial hub of the country. It is known for its local enterprising and artisan skills servicing clients from neighboring countries as well. It hosts the “Kejetia,” West Africa’s largest open-air market supplied and sustained by a strong local industry that has emerged profiting from the surrounding forests and natural resources. Commercially, it acts as a main node between the country’s dry and predominantly poor north and the more prosperous and developed south; moreover, all south-north roads and rail links converge in Kumasi. While civil works are anticipated to be major, labor influx is expected to be moderate considering the available local skill set to support works. Urbanization has been rapid and population density of 6,542.6 persons per sq. km (2021 Population and Housing Census). It is common to see mixed land use of residential and commercial building. The commercial and industrial potential of Kumasi city is a source of attraction to a lot of young migrants from various rural towns in the country in search of better economic opportunities. According to the 2021 PHC, there are more females (51.3%) in urban areas than males (48.7).

#### D. 2. Borrower’s Institutional Capacity

The project will be implemented by the Ministry of Local Government, Decentralization and Rural Development (MLGDRD) with the coordination and cooperation of multiple agencies including Ministry of Roads and Highways (MRH)/Department of Urban Roads (DUR), Department of Transport of the Kumasi Metropolitan Assembly (DoT/KMA), Ministry of Transport (MoT). While the involvement of multiple institutions poses coordination challenges during implementation, it is essential in the case of Kumasi for the success of the project and sustainability of operations. The project envisages establishing a Project Coordinating Office (PCO) under the MLGDRD to oversee the implementation and coordination among the implementing agencies (MRH/DUR, MOT and DoT/KMA) and project stakeholders.

MLGDRD has varying levels of experience preparing and implementing World Bank Projects both under the safeguards policies and ESF. The MLGDRD implemented the Local Government Capacity Support Project (P122692) and currently implementing the Secondary Cities Support Program (P164451), the Ghana side of Gulf of Guinea Northern Region Social Cohesion Project, some components of the Ghana Productive Safety Net project and the Greater Accra Resilient and Integrated Development (GARID) Project. The PIUs in the Ministry have experienced Environmental and Social Specialists. However due to the extensive and substantial risks of this project and work load in their own PIUs, leveraging capacity of the existing specialists will be assessed. However, a dedicated Environmental Specialist and Social Development Specialist will be required for this project to ensure adequate E&S risk management, and these requirements will be further assessed during the project preparation. MRH and MoT have experience implementing the Transport Sector Project (P10200) and currently the Transport Sector Improvement Project (P151026) with mixed E&S performance but overall improvement over the years. DUR also implemented the Ghana Urban Transport Project with similar objective of this current project to improve mobility on some major road corridors by the implementation of a Bus Rapid Transit (BRT) in Accra. E&S capacity assessment will be undertaken during project preparation and define the E&S implementation arrangement, staffing and capacity enhancement relevant to support E&S implementation.



**II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS**

**A. Environmental and Social Risk Classification (ESRC)**

High

**Environmental Risk Rating**

Substantial

The Environmental Risk classification of the proposed project is substantial. This classification is based on the potential environmental risks and impacts as well as the capacity of the implementing agencies. Component 1 (Implementation of a BRT system) will involve road and civil works for (rehabilitation/reconstruction), bridges and non-motorized transport facilities (such as sidewalks and pedestrian crossings) along the BRT corridor and all road alignments of the planned service routes. Other interventions under Component 1 of the project will involve site-specific projects to improve user experience (e.g., bus stops, walkways) and traffic flows (e.g., site-specific rehabilitation, intersection management) of feeder routes. Potential key environmental risks and impacts during the construction phase of the project are (i) potential deterioration of air quality, (ii) noise impacts, (iii) waste (solid, liquid and hazardous) disposal impacts, (iv) vehicular traffic and road accident risks, (v) occupational health and safety risks from construction activities, (vi) potential environmental degradation from raw materials sourcing, and (vii) fire risks. Since the BRT routes will be along the existing Right of Way, and the proposed locations of terminals, depots, park & ride and transfer stations will be within the urban areas of GKMA, there will not be interactions or interference with any natural habitats or ecosystems. The environmental risks and impacts associated with the construction phase are of geographically limited scale within the BRT corridors and other urban areas in GKMA, short-lived during the construction period only and mostly reversible by implementing non-exhaustive or technically/financially challenging mitigation measures. During operations and maintenance phase, the the potential impacts and risks would include (i) land use change (ii) potential surface run-off from the clearing of vegetation cover (iii) potential spillages from the storage and handling of hazardous materials such as lubricants and oils, (iv) fire risks (v) waste (hazardous and non-hazardous) handling and disposal risks (vi) occupational, health and safety risks, (vii) potential air quality impacts from poorly maintained vehicles, and (viii) potential deterioration of road due to a large number of larger, heavier vehicles road usage.

**Social Risk Rating**

High

The Social risk classification for the proposed BRT project is high. Component 1 of the project, Implementation of a BRT system under subcomponent 1.1 and 1.2 entails large-scale i) civil works of the main BRT corridor and the planned service routes (feeder and/or other); (ii) BRT System Development and Operationalization, and includes (a) construction and equipment of BRT facilities (segregated busways, interchange facilities, stations, terminals and depots). These activities are expected to take place within an existing Right of Way. The key social risks and impacts are: (a) significant temporary or permanent economic and physical displacements, involving affecting businesses encroaching/adjacent to the right-of-way, or taking additional land acquisition is needed for minor adjustments in ROW alignment, associated infrastructure such as terminals, stations, operational overpasses, and bridges; (b) livelihood impacts for existing mini-bus drivers and other transport operators who may be relocated or displaced, due to the new BRT routes; (c) traffic disruption and nuisance to nearby residents due to noise and dust during construction; (d) obstruction of access to local residents, especially children, women, elderly and Persons With Disabilities (PWDs) during construction; (e) labor and working conditions, health, safety, and well-being of a large-scale workforce in a dense urban environment, and their interactions with surrounding communities, including sexual exploitation and abuse and exposure to communicable diseases such as COVID-19, HIV/AIDS, STDs; (f) community health and safety risks during operations encompassing universal access for people with disabilities, pedestrian and

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road safety, and potential scenarios involving sexual exploitation, abuse, or harassment of BRT users. The proximity of works to cultural or historic properties requires further due diligence.

## **B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered**

### **B.1. General Assessment**

#### **ESS1 Assessment and Management of Environmental and Social Risks and Impacts**

##### ***Overview of the relevance of the Standard for the Project:***

The proposed KUMAP will have a number of positive environmental and social impacts through improved public transport services. Public transport is a basic social service that mainly benefits the most vulnerable people, including women, the youth, the elderly, and people with reduced mobility, by improving their movement and accessibility to services and opportunities. Environmentally, group and public transportation modes such as the BRT have overall net positive impacts on the environmental parameters, mainly air quality and noise. If the BRT is designed to attract private car users or other types of polluting vehicles to use the BRT, this will reduce air emissions and noise pollution. Proposed result indicators will measure improvements in daily ridership, disaggregated by gender, reduced travel times, improved public perceptions of public transport safety, with gender disaggregation, decrease in GHG emissions and improvements in road safety.

Component 1 of KUMAP will involve large-scale construction activities. Potential key environmental risks and impacts during the construction phase of the project are (i) potential deterioration of air quality, (ii) noise impacts, (iii) waste (solid, liquid and hazardous) disposal impacts, (iv) vehicular traffic and road accident risks, (v) occupational health and safety risks from construction activities, (vi) potential environmental degradation from raw materials sourcing, and (vii) fire risks.

During operations and maintenance phase, the the potential impacts and risks would include (i) land use change (ii) potential surface run-off from clearing of vegetation cover (iii) potential spillages from the storage and handle of hazardous materials such as lubricants and oils, (iv) fire risks (v) waste (hazardous and non-hazardous) handling and disposal risks (vi) occupational, health and safety risks transport routes, (vii) potential air quality impacts from poorly maintained vehicles, and (viii) potential deterioration of road due to a large number of larger, heavier vehicles road usage.

The social risks and impacts are expected to be substantial. Component 1 presents the most sensitive component with social implication. The BRT are expected to be on existing routes. However, businesses, and high valued residential assets both private and public along the ROW may be displaced. Additional lands may be acquired for associated infrastructure such as terminals, stations, operational overpasses, and bridges which may also impact livelihoods of existing mini-bus drivers and other transport operators. Large Labor force is expected for the construction yet labor influx risk is anticipated to be moderate given the potential for availability of local artisans and skills to support civil works. Notwithstanding, contractors will likely recruit some staff from overseas or from outside of region nationally. Impacts such community health and safety in the surrounding areas (noise, dust, traffic, accidents, communicable diseases), sexual exploitation, abuse, and sexual harassment are still eminent. Workers health and safety risks and working condition will need to be adequately managed. Vulnerable groups such as women, girl head porters ('Kayaye'), children, Persons with Disabilities, the elderly may be adversely impacted by the



project and disadvantaged from participating in project benefits. Differentiated measures in consultation and information disclosure, risk assessment and mitigation and exploring access to project opportunities will need to be undertaken.

These risks and impacts will largely be site-specific, temporary and localized and can be managed through appropriate actions and measures, complying with the Bank's Environmental and Social Standards (ESSs). The Borrower will prepare site-specific instruments such as Environmental and Social Impact Assessments (ESIAs) and Resettlement Action Plans (RAPs) for the selected road corridor(s) during project preparation and before appraisal. These site-specific instruments will be cleared by the World Bank, consulted upon, and disclosed prior to appraisal. Additionally, the RAP must be implemented before any civil works commence.

For project activities that are undetermined at this point, the Borrower will adopt a framework approach to assessing potential E&S risks. The Borrower will prepare: (i) an Environmental and Social Management Framework (ESMF); and (ii) a Resettlement Policy Framework (RPF). Again, the Borrower will prepare (i) a Labor Management Procedures (LMP); and (i) a Stakeholder Engagement Plan (SEP). The ESMF, RPF, SEP, and LMP will be cleared by the World Bank, consulted upon, and disclosed prior to appraisal.

**Areas where “Use of Borrower Framework” is being considered:**

The use of Borrower's Framework is not considered under this project.

**ESS10 Stakeholder Engagement and Information Disclosure**

This standard is relevant because the project will involve multiple stakeholders with diverse interest and influence on project activities. Therefore, the inputs and concerns of these stakeholder groups would need to be factored into project design and implementation through meaningful stakeholder engagements.

Key project stakeholders include but not limited to: (i) Government Agencies: Ministry of Roads and Highways (MRH)/Department of Urban Roads (DUR), Department of Transport of the Kumasi Metropolitan Assembly (DoT/KMA), Ministry of Transport (MoT) and Ministry of Local Government, Decentralization and Rural Development (MLGDRD), (ii) Development Partners: European Union, French Development Agency (AFD), Swiss Development Agency, JICA and AfDB (iii) the private sector: transport unions and operators and other industry stakeholders (e.g. drivers, conductors, and route managers), (iv) informal vendors, (v) civil Society and Non-Government organizations; (vi) local communities, and (vii) media.

Meaningful stakeholder engagement is vital to ensure inclusive participation of those who may be adversely impacted, promote stakeholder buy-in, manage public expectations and navigate political-economy situations. Such engagement will need to address key stakeholders across the project areas of influence to understand various perspectives of impacts and benefits, how adverse impacts will be experienced and how they may be mitigated and similarly, how benefits can be enhanced.

Stakeholder engagement will start as early as feasible during project preparation to enable a coherent strategy for environmental and social management. The Borrower will engage early and extensively the informal trotros (mini-bus





services) and other similar key stakeholders. This will ensure that the possible impacts on their livelihoods are fully addressed as part of project design.

The Borrower will develop a Stakeholder Engagement Plan (SEP) which will outline the characteristics and interests of the relevant stakeholder groups as well as the timing and methods of engagement envisioned throughout the project lifecycle. The project will ensure that the needs and voices of vulnerable people (e.g. female-headed households, elderly, youth, people with disabilities, etc.) are heard through inclusive consultation and participation to ensure that they can equally participate and benefit from the project. The project will also include consultations with consumer associations, civil society organizations (CSOs) and other relevant parties on how to improve access to project benefits to people with disabilities. The project will also ensure that respective provisions on gender equality and the mitigation of gender-based violence in digital businesses will be implemented; to avoid potential adverse impacts but also to ensure strong participation of women in the development of the country's digital sector.

The SEP will incorporate a comprehensive project wide Grievance Redress Mechanism, which will enable a broad range of stakeholders to channel concerns, questions, and complaints to the various implementing agencies. If major changes occur in the scope of the project activities during implementation, the SEP will be revised and publicly re-disclosed accordingly. The SEP will also include a referral pathway for handling GBV/SEA/SH cases should that arise during project implementation. The SEP will be approved by the World Bank, consulted upon and disclosed by the Borrower prior to appraisal.

## **B.2. Specific Risks and Impacts**

**A brief description of the potential environmental and social risks and impacts relevant to the Project.**

### **ESS2 Labor and Working Conditions**

This standard is relevant since the project will engage different categories of project workers: direct workers, contracted workers, and primary supply workers. The ESS2 recognizes the importance of promoting sound worker-management relationships and enhancing the development benefits of the project by treating workers fairly and providing safe and healthy working conditions. Since the project will take place in a large metropolis, it is expected that most labor will be supplied locally, and no major issues associated with labor influx are anticipated. The Borrower will ensure and emphasize non-discrimination and equal opportunity in the recruitment process, and recognition of workers' rights of association including provision for grievance mechanism for all project workers. As part of the labor management, the Borrower will prepare a Labor Management Procedures (LMP). The LMP will describe the requirements and expectations in terms of compliance, reporting, roles, supervision and training with respect to labor and working conditions. The LMP will also cover Occupational Health and Safety (OHS) related issues (e.g. noise and sound exposure, fall and trips, handling heavy machinery, tools and equipment, PPE usage, etc.) and COVID-19 prevention strategies. The contractor will adapt the LMP and implement it to ensure compliance to the national labor requirements and ESS 2. Borrower will require contractors to establish workers grievance mechanism proportionate to the nature and scale of the project to enable all direct workers and contracted workers to raise workplace concerns and to receive timely resolution and feedback to complaints.



The LMP will be revisited and updated as required during the project implementation phase as additional labor-related risks or issues unfold. Also, a Workers Code of Conduct, which contains obligations of all workers involved in the project will be prepared and adherence to the code of conduct will be a condition of employment for all project workers, including issues related to nondiscrimination and sexual harassment. The LMP and the code of conduct will be part of the bidding documents for construction.

### **ESS3 Resource Efficiency and Pollution Prevention and Management**

This standard is relevant since the project activities involves road and civil works which can be associated with the use of hazardous materials, consumption of energy, water and raw material as well as generation of waste. The consumption of fossil fuel by construction vehicles and machinery will result in the emission of toxic and other greenhouse gases (e.g., carbon monoxide, sulfur dioxide, etc.) During the operations and maintenance phase, hazardous waste (e.g., waste oil, spent batteries) will be generated from operational activities. The BRT system will involve the use of fuel-efficient vehicles. However, if the BRT buses are not poorly serviced, the operations of the buses will emit toxic gases into the atmosphere. The Operations and Maintenance (O&M) phase will also involve the generation and management of waste.

The Borrower should ensure that contractors source materials from approved quarries and license sites. The Borrower will make sure that these are duly accredited and have the necessary permits in force. To ensure adequate sourcing and transportation of construction materials, the Borrower will prepare a specific ESMP for this. Management of Pollution Legacies. As part of the analysis of alternatives, consideration of alternatives related to the bus stations and bus depot designs and management will be included in the interest of identifying technologies that would help manage air quality baseline conditions.

### **ESS4 Community Health and Safety**

This standard is relevant since the project entails designing, constructing and operating structural elements, including dedicated bus lanes and interchanges, bridges, tunnels, bus stations and stops, pedestrian walkways, etc. The site specific ESIA/ESMPs will assess the safety of various conceptual design options for the BRT, and recommend further studies, design requirements and mitigation measures consistent with ESS4, for all future project phases, including relating to road safety; potential exposure of the public to accidents; taking into account climate change in the structural design; and, applying the concept of universal access to new structures and buildings that are accessible to the public, where technically and financially feasible. The ESCP will require that the detailed design and all subsequent project phases, will undergo road safety assessment, monitor incidents and accidents and prepare regular reports of such monitoring.

Community health and safety impacts for communities adjacent to the BRT construction works also include risks of noise and dust, traffic disruptions, accidents, general construction exposure to pathogens, including COVID-19. Interactions with project construction workers and for women users of BRT once in operation may cause risks of



sexual exploitation and abuse (SEA) and sexual harassment (SH). The ESIA will assess community health and safety risks and impacts during construction, as well as the accessibility and safety for women (including SEA/SH/GBV during operation), users with disabilities and the elderly during operations. A separate SEA/SH Action Plan will be prepared prior to appraisal.

#### **ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

The project activities under Component 1 will involve construction and civil works activities. The construction of the project infrastructure (e.g., pavement, drainage, terminals, etc.) will trigger provisions under ESS5. Although the route is planned within an existing right of way, the project may result in adverse social risks and impacts from physical and economic displacement of people and businesses, vendors (semi-stationary or others) who currently reside within the right of way or where additional land taking is needed for associated infrastructure such as terminals, stations and bridges.

The potential social and livelihood impacts on existing (formal and informal) public transport operators and businesses served by existing bus routes that might be impacted by efficiencies resulting from the new BRT, as well as from induced developments, will be assessed under ESS1 as part of the ESIA. . Project locations are currently unknown. As such, the project will prepare a Resettlement Policy Framework (RPF) prior to project appraisal to guide the preparation of a Resettlement Action Plans (RAPs) during implementation when site location decisions are confirmed. Civil works will not commence until the RAP is prepared, cleared, disclosed and implemented.

#### **ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

This standard is considered relevant, on a precautionary basis since the project involves road and civil works and construction and improvement of roads sometimes leads, directly or indirectly, to the loss and degradation of natural habitats. Induced negative impacts of road projects on biodiversity can be minimized by careful project siting, taking special care to avoid passing or sourcing materials from critical natural habitats, including forested areas (which are especially vulnerable to induced impacts).

Once the specific sites are identified, the Borrower will ensure that all project activities in these areas are screened and any additional environmental assessments that may be required are carried out and the mitigation measures implemented to reduce the direct, indirect and the residual impacts of these activities. The screening process will confirm the need for ESIA, ESMPs or Biodiversity Management Plans (BMPs) for the targeted areas. Site-specific ESMPs/ESIAs will assess and mitigate risks related to ESS6 to ensure that project activities do not cause any undue harm to or alter habitats.

#### **ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**

This standard is not relevant since there are no known indigenous people in Ghana.



**ESS8 Cultural Heritage**

This standard is considered relevant, on a precautionary basis since the project will involve excavation and earthworks. The ESMF will incorporate specific consideration for engaging local communities and traditional authorities on the management of issues associated with known cultural sites and artifacts. The Borrower will adopt and implement the Chance Finds procedure to be described in the ESMF. In the event of a find or the observation of a cultural practice, the Project will follow the guidelines to be detailed in the ESMF and contact the relevant government agencies that is entrusted with the protection of cultural heritage in Ghana to assist to preserve such finds.

**ESS9 Financial Intermediaries**

This standard is considered not relevant since the project will not involve Financial Intermediaries.

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways** No

**OP 7.60 Projects in Disputed Areas** No

**III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE**

**A. Is a common approach being considered?** No

**Financing Partners**

At this concept stage, the financing arrangements does not include other partners. There are ongoing discussions with Development Partners for co-financing. Should this change as preparation progresses the ESRS will be updated at appraisal stage.

**B. Proposed Measures, Actions and Timing (Borrower’s commitments)**

**Actions to be completed prior to Bank Board Approval:**

The following instruments should be prepared prior to appraisal and Board:

1. Preparation, consultation and disclosure of ESIA and RAPs for selected road corridors.
2. Preparation, consultation and disclosure of ESMF and RF.
3. Preparation of Stakeholder Engagement Plan (including GRM).
4. Prepare Labor Management Procedures.
5. Preparation and disclosure of ESCP.
6. SEA/SH Action Plan.

**Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):**



1. Implement ESIA's and RAPs.
2. Operationalization of the ESMF and RF and screening of sub-projects prior to the implementation of proposed interventions.
3. Establish and implement Project GRM.
4. Implement Gender, SEA, SH action plan.
5. E&S staffing and implementation arrangement Officers
6. Capacity building on E&S Management and Reporting; and
7. E&S reporting.

**C. Timing**

**Tentative target date for preparing the Appraisal Stage ESRS**

12-Dec-2023

**IV. CONTACT POINTS**

**World Bank**

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**Borrower/Client/Recipient**

Borrower: Ministry of Finance

**Implementing Agency(ies)**

Implementing Agency: Kumasi Metropolitan Assembly

Implementing Agency: Department of Urban Roads

**V. FOR MORE INFORMATION CONTACT**

Public Disclosure



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**VI. APPROVAL**

Task Team Leader(s):	Haileyesus Adamtei Mengesha, Catherine Lynch
Practice Manager (ENR/Social)	Sanjay Srivastava Recommended on 23-May-2022 at 14:54:0 GMT-04:00
Safeguards Advisor ESSA	Nathalie S. Munzberg (SAESSA) Cleared on 11-Jun-2022 at 11:29:25 GMT-04:00