



Republic of Madagascar
MULTIMODAL TRANSPORT AND LOGISTICS
PROJECT (MTLP)
P512330

ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)

Negotiated Version
March 03, 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Madagascar (the Recipient) will implement the Multimodal Transport and Logistic Project (the Project), with the participation of the Ministry of Transport and Meteorology (MTM), the Ministry of Economy and Finance (MEF), Ministry of Environment, the MTLP Project Coordination Unit (PCU/PTML) within the MTM ensuring coordination and oversight of activities implemented by Madagascar Railways (Madarail - operating the northern railway network under a concession agreement), Aéroports de Madagascar (ADEMA - the national airport management company responsible for developing Madagascar's secondary and regional airports) and Agence Portuaire Maritime et Fluviale (APMF – responsible of the management of rivers' and secondary ports' activities). The Association has agreed to provide financing for the Project, as set out in 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. 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 Agreement.
3. Without limitation to the foregoing, 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 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 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, ESCP will be revised from time to time, if necessary, 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 through the General secretary of MTM. 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	ORGANIZATIONAL STRUCTURE		
	1. Establish and maintain a Project Coordination Unit (PCU) within the Ministry of Transport and Meteorology (MTM). The PCU will be responsible solely for overall coordination, oversight, and consolidation of reporting, including consolidation of environmental and social (E&S) performance information submitted by implementing entities. To this end, the PCU shall include one qualified dedicated environmental and social risk Supervisor.	1. Hire the Environmental and Social supervisor no later than two months after effective date and thereafter maintain these positions throughout Project implementation. The PCU E&S Supervisor position shall be maintained throughout Project implementation.	Ministry of Transport and Meteorology
	2. Establish and maintain a Project Implementation Unit (PIU) within MADARAIL responsible for direct implementation of activities under its mandate. The MADARAIL-PIU shall be staffed with, at a minimum, one (1) dedicated environmental risk specialist (ERS), and one (1) dedicated social risk specialist (SRS), with terms of reference acceptable to the Association	2. These positions shall be filled no later than two months after the Project Effective Date and maintained throughout implementation of all activities for which MADARAIL serves as implementing agency.	MADARAIL
	3 – Establish and maintain Project Technical Units (PTUs) within ADEMA and APMF, to implement E&S activities for the components under their responsibility. The ADEMA-PTU shall include a dedicated environmental risk specialist (ERS), and a dedicated social risk specialist (SRS); the APMF-PTU shall include an environmental risk specialist (ERS), social risk specialist (SRS). All specialists shall have experience and terms of reference acceptable to the Association.	3.- These positions shall be filled no later than two months after the Project Effective Date and maintained throughout implementation of each component of the project.	APMF ADEMA
4. The three implementing units shall jointly recruit, and thereafter maintain throughout Project implementation, one qualified GBV Specialist, with experience in SEA/SH risk prevention and response. The Specialist will support the management, coordination, monitoring, and reporting of SEA/SH and broader GBV-related risks across all Project components, including oversight of contractors' compliance with SEA/SH action and other relevant plans.	4.Hire the GBV Specialist no later than two months after effective date and thereafter maintain these positions throughout Project implementation. The GBV Specialist position shall be maintained throughout Project implementation.	MADARAIL-PIU, APMF-PTU, ADEMA-PTU	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>1. Prepare and implement the capacity building plan: for PCU, MADARAIL, ADEMA and APMF staff, stakeholders, communities, Project workers on : stakeholder mapping and engagement, specific aspects of environmental and social assessment, E&S monitoring, emergency preparedness and response, community health and safety, worksite and worker safety, mitigation of risks related to Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH), and the use of a survivor-centered approach in handling SEA/SH cases, promotion of women’s participation and child protection, inclusion of vulnerable and disadvantaged groups in the consultation process, grievance redress mechanisms, incident reporting, digitization of processes and best practices in the management of sensitive sites, implementation of the RP, ESMPs, and LRP.</p>	1. Submit the Capacity Building Plan to the Association no later than three months after the Project Effective Date and thereafter implement the Capacity Building Plan throughout the Project Implementation period.	MADARAIL-PIU, APMF, ADEMA-PTU PCU for coordination
	<p>2. Require contractors and subcontractors to prepare, submit to supervision engineers for clearance, and thereafter implement regular training courses in local languages to the benefit of the workers on labor provisions, codes of conduct, and the grievance mechanisms, including those measures related to SEA/SH risk mitigation.</p>	2. Same time frame as for the submission of Contractor ESMP as specified in the section 1.2	MADARAIL-PIU, APMF, ADEMA-PTU PCU for coordination
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 Project. 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 monthly contractors’ and supervision firms’ reports. 	Submit quarterly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than 15 days after the end of each reporting period.	MADARAIL-PIU, APMF-PTU, ADEMA-PTU PCU for coordination

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> Number and status of resolution of incidents and accidents reported under action E below. 		
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms 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 Association.</p>	Submit the monthly reports to the Association upon request.	<p>MADARAIL-PIU, APMF-PTU, ADEMA-PTU</p> <p>PCU for coordination</p>
E	<p>INCIDENTS AND ACCIDENTS</p> <p>1. Notify the Association of any incident or accident relating to the project 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 SEA/SH; or disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p> <p>2. Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes according to the incident types (OHS and other incidents vs SEA/SH incidents).</p> <p>3. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the project related incident or accident and prevent its recurrence.</p>	<p>1. Notify the Association no later than 24 hours after learning of the incident or accident. Provide available details upon request.</p> <p>2. Provide review report 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>3. Provide Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, as agreed with the association, unless a different timeframe is agreed to in writing by the Association.</p>	<p>MADARAIL-PIU, APMF-PTU, ADEMA-PTU</p> <p>PCU for coordination</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <p>1. Finalize and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p>	<p>1. The draft ESMF developed and disclosed on February 4, 2026. Finalize the ESMF no later than three months after the project's effective date and thereafter implementation the ESMF throughout Project implementation.</p>	<p>MADARAIL-PIU, APMF-PTU, ADEMA-PTU</p> <p>PCU for coordination</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. Prepare and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for component 1, 2 and 3, and any relevant subcomponent of PTML Project, consistent with the relevant ESSs.	2. Prepare the ESIA/ESMP prior to bidding process and incorporate the environmental and social (E&S) clauses into the tender documents before their launch for activities under components 1.1; 1.2; 2.1; 2.2; 2.3; 2.5 and 3.1.;3.2 and thereafter implement the ESIA and ESMP throughout Project implementation.	
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>1. Incorporate the relevant aspects of the ESCP, including, inter alia, the Labor Management Procedures, code of conduct and relevant provisions for managing SEA/SH risks on worksites, as well as SEA/SH allegations involving project workers, 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 and supervising firms to the Association.</p> <p>2. The PCU, MADARAIL, ADEMA and APMF will ensure that the contractor prepares and implements a Contractor's ESMP in accordance with the ESMF and ESIA/ESMPs developed for the activities under components 1.1, 1.2, 2.1, 2.2, 2.3, 2.5 and 3.1., 3.2</p>	<p>1. As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Association upon request.</p> <p>2. The Contractor ESMPs must be approved by the supervising firm before the installation of the companies' worksites and thereafter implement throughout the corresponding activity.</p>	<p>MADARAIL-PIU, APMF-PTU, ADEMA-PTU</p> <p>PCU for coordination</p>
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Carry out the consultancies, studies including feasibility studies, if applicable, capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter prepare and finalize the output of such activities in compliance with the terms of reference.</p>	One month before the launch of the activity and maintained throughout the entire implementation of the project.	MADARAIL-PIU, APMF-PTU, ADEMA-PTU
1.4	<p>USE OF BORROWER/RECIPIENT'S ENVIRONMENTAL AND SOCIAL FRAMEWORK</p> <p>1.Ensure that the E&S risks and impacts of the Project, are managed in accordance with this ESCP and the Recipient's E&S Framework, especially</p>	1.Throughout project implementation.	<p>MADARAIL-PIU, APMF-PTU, ADEMA-PTU</p> <p>PCU for coordination</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>in terms of labor and working conditions as well as for land acquisition, which includes, inter alia, the country's relevant policy, legal and institutional framework, including its national, departmental, or local implementing institutions and applicable laws, regulations, procedures, and implementation capacity.</p> <p>2. Promptly notify the Bank of any modification to the BESF that may affect the management of the Project's environmental and social risks and impacts.</p>	<p>2. Notify the Association immediately after taking note of the change to the Recipient's E&S Framework. Subsequent actions, if requested by the Association, shall be reflected in an updated ESCP as indicated in paragraph 4 of the Initial Section of this ESCP.</p>	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Finalize and implement the Labor Management Procedures (LMP) for the Project, containing a code of conduct for workers with SEA/SH provisions in accordance with ESS2 as well as Recipient's E&S Framework.</p>	<p>Draft LMP developed and disclosed on February 4, 2026. Finalize the LMP no later than three months after the Project's effective date and thereafter implement the LMP throughout Project implementation.</p>	PCU-PTML
2.2.	<p>Require contractors (local and international) to develop labor management procedures acceptable to the project and the Association</p>	<p>The Contractor LMPs must be approved by the supervising engineers before launching the works and thereafter implement throughout the corresponding activity.</p>	<p>MADARAIL-PIU, APMF-PTU, ADEMA-PTU</p> <p>PCU for coordination</p>
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</p> <p>1. Prepare and implement an OHS Management Plan as part of C-ESMPs and LMP to assess and manage the OHS risks and impacts of the Project.</p>	<p>1. Same timeframe as the ESIA and ESMP in section 1.1 and thereafter implement the OHS Management Plan throughout Project implementation.</p>	<p>MADARAIL-PIU, APMF-PTU, ADEMA-PTU</p> <p>PCU for coordination</p>
	<p>2. Require contractors and subcontractors to prepare and implement OHS Management Measures or Plan in accordance with ESS2.</p>	<p>2. Same timeframe as the ESIA and ESMP in section 1.2 and thereafter implement the OHS Management Plan throughout Project implementation.</p>	
2.4	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>1. Establish and operate a SEA/SH-sensitive grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	<p>1. Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.</p>	<p>MADARAIL-PIU, APMF-PTU, ADEMA-PTU</p>
	<p>2. Require suppliers and service providers to establish and implement a Worker Grievance Mechanism within their organization</p>	<p>2. Worker GM for suppliers and service providers to be developed as part of the C-ESMP (see deadline 1.2) and operational before the recruitment of workers for the Project to obtain the Service Order (SO), then maintain and operate it throughout the implementation of the Project</p>	<p>PCU for coordination</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Prepare and implement a Waste Management Plan (WMP), as part of the ESMP prepared for the Project under action 1.1 above, to manage hazardous and non-hazardous waste, consistent with ESS3.	Same timeframe as the ESIA and ESMP in section 1.1 and thereafter implement WMP throughout Project implementation.	MADARAIL-PIU, APMF-PTU, ADEMA-PTU PCU for coordination
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESIA/ESMP to be prepared under action 1.1 above.	Same timeframe as the ESIA and ESMP in section 1.1 and thereafter implement WMP throughout Project implementation.	MADARAIL-PIU, APMF-PTU, ADEMA-PTU PCU for coordination
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.1 above.	Same timeframe as the ESIA and ESMP in section 1.1 and thereafter implement WMP throughout Project implementation.	MADARAIL-PIU, APMF-PTU, ADEMA-PTU PCU for coordination
4.2	COMMUNITY HEALTH AND SAFETY 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, SEA/SH-related risks, response to emergency situations, and include mitigation measures in the ESMPs to be prepared under action 1.1 above, in accordance with the ESMF.	Same timeframe as the ESIA and ESMP in section 1.1 and thereafter implement the plan throughout Project implementation.	MADARAIL-PIU, APMF-PTU, ADEMA-PTU PCU for coordination
4.3	SEA AND SH RISKS Finalize and implement a SEA/SH Action Plan, to assess and manage the risks of SEA and SH with relevant risk mitigation measures incorporated into the action plan.	Draft SEA/SH Action Plan developed and disclosed on February 4, 2026. Finalize, disclose, and adopt the SEA/SH Action Plan no later than three months after the Project's effective date and thereafter implementation of the SEA/SH Action Plan throughout Project implementation.	MADARAIL-PIU, APMF-PTU, ADEMA-PTU PCU for coordination
4.4	Assess, update the existing Port Maritime / facility safety plan and thereafter implement to manage the operation of secondary port	Revise the Port Maritime / facility safety plan no later than three months before the end of civil works on the financed secondary ports and thereafter implementation of the Port Maritime / facility safety plan throughout the operation of secondary port.	APMF-PTU
4.5	SECURITY MANAGEMENT Assess and implement measures or Security Management Plan to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities as set out in the ESMP under action 1.1 above.	Same timeframe as the ESIA and ESMP in section 1.1 and thereafter implement the plan throughout Project implementation.	MADARAIL-PIU, APMF-PTU, ADEMA-PTU PCU for coordination

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT FRAMEWORK Finalize and implement a Resettlement Framework (RF) of the project consistent with ESS5.	Draft RF developed and disclosed on February 4, 2026. Finalize and disclose the RF no later than 3 months after effectiveness date and thereafter implement the RF throughout Project implementation.	MADARAIL-PIU, APMF-PTU, ADEMA-PTU PCU for coordination
5.2	RESETTLEMENT PLAN 1. Prepare and implement a Resettlement Plan (RP) of the railway and logistics platform under Component 1, consistent with ESS5. 2. Prepare and implement a Resettlement Plan (RP) and/or a Livelihood Restoration Plan (LRP) for the development of the quays at the Port of Mahajanga, and for the rehabilitation of Pangalanes Canal under Component 2 and any other relevant sub-project, and consistent with ESS5. 3. Prepare, disclose, and implement a Resettlement Plan (RP) and/or a Livelihood Restoration Plan (LRP) as required for each relevant sub-project, and consistent with ESS5.	1. Resettlement Plan (RP) of the railway to be finalized, disclosed and implemented before the launch of the implementation of subcomponents 1.1 and 1.2. 2. and 3. Prepare, disclose, and implement the measures of the respective RP or LRP before the launch of the implementation of subcomponents 2.1; 2.2; 2.3; 2.5; 3.1; 3.2. For 1,2, 3 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.	MADARAIL-PIU, APMF-PTU, ADEMA-PTU PCU for coordination
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Prepare and implement an appropriate biodiversity mitigation measure as part of the ESMP or ESIA, under action 1.1 above, in accordance with the guidelines of the ESIA prepared for the Project, and consistent with ESS6.	Same timeframe as the ESIA and ESMP in section 1.1 and thereafter implement the plan throughout Project implementation.	MADARAIL-PIU, APMF-PTU, ADEMA-PTU PCU for coordination
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	INDIGENOUS PEOPLES [FRAMEWORK] [PLAN] or [PLANS] NOT RELEVANT TO THE PROJECT		
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS As required, Prepare and implement a Cultural Heritage Management Plan (CHMP) as part of the ESMP under action 1.1 above, in accordance with the guidelines of the ESIA prepared for the Project, and consistent with ESS8.	Same timeframe as the ESIA and ESMP in section 1.1 and thereafter implement the CHMP throughout Project implementation.	MADARAIL-PIU, APMF-PTU, ADEMA-PTU PCU for coordination

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
8.2	<p>CHANCE FINDS</p> <p>Describe and implement the chance find procedures, as part of the ESMF, ESMP under action 1.1 above.</p>	Same timeframe as the ESIA and ESMP in section 1.1 and thereafter implement the CFP throughout Project implementation.	MADARAIL, APMF, ADEMA PCU for coordination
ESS 9: FINANCIAL INTERMEDIARIES			
NOT RELEVANT			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>Maintain, implement and update as required 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.</p>	SEP developed and disclosed on February 4, 2026. Implement and update as required the SEP throughout Project implementation.	MADARAIL-PIU, APMF-PTU, ADEMA-PTU PCU for coordination
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 Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, 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 in the same timeframe as described into the SEP as defined under the action 10.1 and thereafter maintain and operate the mechanism throughout Project implementation.	MADARAIL-PIU, APMF-PTU, ADEMA-PTU PCU for coordination
INDICATORS FOR IMPLEMENTATION READINESS			
<p>The following actions are indicators for implementation readiness:</p> <ul style="list-style-type: none"> - Hiring environmental specialists, social, and GBV specialists as indicated in Section A. - Environmental and social capacity building plan as indicated in Section B. - An operational grievance redress mechanism is in place, as indicated in Section 10.2. 			