

**REPUBLIC OF GHANA**



**GHANA PRODUCTIVE SAFETY NET PROJECT 2 (GPSNP 2)**

**Draft**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

**February 2021**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

The Government of Ghana will implement the Ghana Productive Safety Net Project 2 (the **Project**), with the involvement of the following Ministries: Ministry of Local Government and Rural Development and the Ministry of Gender, Children and Social Protection. The International Development Association (hereinafter the Bank) has agreed to provide financing for the Project.

The Government of Ghana will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.

The Government of Ghana will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Plans (ESMP), Resettlement Action Plans (RAP), and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.

The Government of Ghana is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.

Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the *Bank* by the Government of Ghana as required by the ESCP and the conditions of the legal agreement, and the *Bank* will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.

As agreed by the Bank and Government of Ghana, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Government of Ghana will agree to the changes with the *Bank* and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the *Bank* and the Government of Ghana/ Delegate(s). The Government of Ghana/Delegate(s) will promptly disclose the updated ESCP.

Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Government of Ghana shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include *environmental, health and safety impacts, and gender-based violence*].

The tables below provide measures and actions for various parts of project implementation, together with the timeframe and the entity responsible for the action.

<b>MONITORING AND REPORTING</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
A	<p><b>REGULAR REPORTING</b></p> <p>The Ministry of Local Government and Rural Development (MLGRD) and Ministry of Gender, Children and Social Protection (MOGCSP) will prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project. The report will include but not limited to, the implementation of the ESCP, status of preparation and implementation of E&amp;S documents prepared to mitigate E&amp;S risks and impacts as required by the ESF, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	Quarterly, six-monthly and annually throughout Project implementation.	MLGRD/ MoGCSP
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>The MLGRD/ MOGCSP will promptly notify the Bank of any incident or accident related 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 community agitation, death due to injury at site or harm and incidents such as fire injuries, physical violence, Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), communicable diseases and infections etc.</p> <p>The report will provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Bank request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Bank within 48 hours after learning of the incident or accident.</p> <p>A report would be provided within a timeframe acceptable to the Bank, as requested</p>	MLGRD/RDCU/ MoGCSP
C	<p><b>CONTRACTORS MONTHLY REPORTS</b></p> <p>Contractors shall provide monthly monitoring reports, including E&amp;S report to the Rural Development Coordinating Unit (RDCU)</p>	The reports shall be submitted to the RDCU on a monthly basis, and to the Bank upon request	MLGRD/RDCU/ MoGCSP
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>

<b>MONITORING AND REPORTING</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>The MLGRD through the RDCU shall establish and maintain an organizational structure with qualified staff and resources to support management of E&amp;S risks and impacts including an Environmental and Social Safeguards Specialist.</p> <p>The Environmental and Social Safeguard Specialist, Gender Officer and Environment and Social focal persons currently implementing the GH- Productive Safety Net Project (GPSNP, P164603) will provide E&amp;S support for risk identification, management and reporting for GPSNP-2. They will be supported by Environmental and Social Safeguards Officers at the Zonal level to implement the project and adequately resourced to support management of E&amp;S risks. The RDCU may also hire external expertise and consultancy services, where necessary. This structure will be maintained throughout project implementation.</p>	<p>The Environmental and Social Safeguard Specialist, Gender Officer and Environment and Social focal persons currently implementing the GH- Productive Safety Net Project (GPSNP, P164603) will provide E&amp;S support for risk identification, management and reporting for GPSNP-2. This organizational structure will be maintained throughout Project implementation.</p>	MLGRD/RDCU
1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <p>The MLGRD shall adopt, and implement, the Environmental and Social Management Framework (ESMF) and Resettlement Policy Framework (RPF) that have been prepared for the Project, in a manner acceptable to the Bank. ESMF includes LMP and IPMP.</p> <p>LIPW subprojects will be screened for Environmental and Social risks and impacts as per the procedures outlined in the ESMF, in a manner acceptable to the Bank. Based on the screening results, detailed Environmental and Social Impact Assessments (ESIAs) may be conducted and accompanied by the relevant ESMPs and Resettlement Action Plan(s) to address any risks identified during implementation.</p>	<ul style="list-style-type: none"> <li>• Prior to commencing of the relevant Subprojects activities.</li> <li>• Throughout project implementation.</li> </ul>	MLGRD/RDCU
1.3	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>The MLGRD through the RDCU will screen any proposed subproject in accordance with the Environmental and Social Management Framework (ESMF) prepared for the Project and, thereafter, draft, adopt, and implement any required subsequent subproject environmental management tool and Resettlement Plans as required, in a manner acceptable to the Bank.</p>	<ul style="list-style-type: none"> <li>• ESIAs/ ESMPs/RAPs when required, shall be prepared and submitted for the Bank approval before launching the bidding process for the respective subproject. Once approved, the ESMPs are carried out throughout Project implementation.</li> </ul>	MLGRD/RDCU

<b>MONITORING AND REPORTING</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
		<ul style="list-style-type: none"> <li>RAP will be implemented before commencement of relevant construction activities.</li> </ul>	
1.4	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>The MLGRD through the RDCU will incorporate the relevant aspects of the ESCP and ESMF, including the relevant E&amp;S documents and/or plans, the Labor Management Procedures, worker code of conducts into the ESHS specifications of the procurement documents with contractors. Thereafter, it will ensure that the contractors comply with the ESHS specifications of their respective contracts.</p>	<ul style="list-style-type: none"> <li>Prior to the preparation of procurement documents.</li> <li>Supervise contractors throughout Project implementation.</li> </ul>	MLGRD/RDCU
1.5	<p><b>PERMITS, CONSENT AND AUTHORIZATION</b></p> <p>The MLGRD shall secure relevant permits, consents and authorizations applicable to the subproject activities from relevant national authorities/ agencies.</p> <p>The Government shall comply or cause to comply, as appropriate, with the conditions established in these permits, consents and authorizations throughout Project implementation.</p>	Throughout project implementation.	MLGRD/RDCU
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Update, adopt, and implement the Labor Management Procedures (LMP) that have been developed for the Project as part of ESMF, and that includes provisions for direct, contracted, and community workers including but not limited worker GRM and code of conducts.</p> <p>The LMP will be referenced in the ESHS specifications of the procurement documents with requirements for contractors to update into a Plan during implementation and comply with its requirement.</p>	Throughout Project implementation.	MLGRD/RDCU

<b>MONITORING AND REPORTING</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>The contractor shall maintain and operate within the Project grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Grievance mechanism operational prior to engaging Project workers and maintained throughout Project implementation.	MLGRD/RDCU
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>The MLGRD shall prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESMF, in accordance with national requirements and GIIP, or any subsequent tool that will be occasioned by the ESMF.</p> <p>Contractors working on the Project shall abide by the approved occupational, health and safety (OHS) plan/ measures. The OHS plan shall include COVID-19 prevention and response measures.</p> <p>Project ESS Specialist shall train/orientate employees of Project Contractors on various aspects of OHS relevant to the project on a regular basis.</p>	Prior to commencement of construction activities and shall be implemented throughout Project life.	MLGRD/RDCU
2.4	<p><b>EMERGENCY PREPAREDNESS AND RESPONSE (OHS) MEASURES</b></p> <p>The MLGRD shall, as part of the OHS measures specified above in 2.3, institute measures on Emergency Preparedness and Response including ensuring that workers and contractors are trained on emergency preparedness and response on a regular basis, drill are conducted regularly, and the implementation of the relevant plan.</p>	<ul style="list-style-type: none"> <li>• Prior to initiation of subprojects involving construction.</li> <li>• Maintained throughout Project implementation</li> </ul>	MLGRD/RDCU
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b></p> <p>Resource efficiency and pollution prevention and management measures covered under the ESMF or any subsequent tool to be occasioned by it shall be complied with. Specific measures will be included in the ESMPs that will be prepared before commencement of any civil work.</p> <p>Integrated Pest Management Plan (IPMP) annexed to the ESMF will be implemented by the project as required during implementation.</p>	Same timeframe specified for the implementation of the ESMF and ESMP	MLGRD/RDCU

<b>MONITORING AND REPORTING</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>Project Contractors shall be required to implement measures and actions in the sub project checklist/technical specifications to assess and manage traffic and road safety risks as required.</p>	<p>Prior to project implementation. Maintained throughout Project implementation</p>	MLGRD/RDCU
4.2	<p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>MLGRD shall prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities and include these measures in any ESMP, to be occasioned by the ESMF, in a manner acceptable to the Bank. MLGRD shall adopt and implement a stand-alone COVID-19 Response Plan prepared to assess and manage the risks of spread of COVID-19.</p>	<p>Prior to project implementation and staff recruitment. Maintained throughout Project implementation.</p> <p>Submit the COVID-19 Response Plan for the Bank's approval before commencement of field activities. Once approved, the Plan is implemented throughout Project implementation.</p>	MLGRD/RDCU
4.3	<p><b>GBV AND SEA RISKS</b></p> <p>The MLGRD shall prepare, adopt, and implement a stand-alone Gender-Based Violence Action Plan (GBV Action Plan), to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA), leveraging the Gender Inclusion Plan prepared under GPSNP.</p>	<p>Submit the GBV Action Plan for the Bank's approval before the commencement of actual field activities. Once approved, the GBV Action Plan is implemented throughout Project implementation.</p>	MLGRD/RDCU
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
5.1	<p><b>RESETTLEMENT PLANS</b></p> <p>The MLGRD/RDCU shall prepare, adopt, and implement resettlement plans (RAPs) in accordance with ESS 5 and consistent with the requirements of the Resettlement Policy Framework (RPF) that has been prepared for the Project, and thereafter adopt and implement the respective RAPs before carrying out the associated activities, in a manner acceptable to the Bank</p>	<p>RAP shall be submitted for the Bank's approval and, once approved, implemented prior to commencing Project activities that involve land acquisition and resettlement.</p>	MLGRD/RDCU

<b>MONITORING AND REPORTING</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
5.2	<p><b>GRIEVANCE MECHANISM</b></p> <p>The grievance mechanism to address resettlement-related complaints shall be described in the RPF, RAPs and SEP, and will be completed before commencement of project activities. The GRM will incorporate existing GPSNP GRM systems in place at the implementing agencies and the local level.</p>	Prior to commencement of resettlement activities and maintained throughout implementation	MLGRD/RDCU
5.3	<p><b>MONITORING AND REPORTING ON RESETTLEMENT ACTION PLANS</b></p> <p>The MLGRD shall through the RDCU prepare and submit regular monitoring reports on the implementation of Resettlement Action Plans, including on issues related to land acquisition, assessment/census of PAPs and compensation</p>	Quarterly throughout implementation of RAPs	MLGRD/RDCU
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL</b>			
6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS</b></p> <p>The MLGRD through the RDCU will avoid adverse impacts on biodiversity and habitats. Where avoidance of such impacts is not possible, the Project will adopt and implement measures and actions for biodiversity impact mitigation as required in the ESMF</p>	Throughout Project Implementation	MLGRD/RDCU
<b>ESS 8: CULTURAL HERITAGE</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
8.1	<p><b>CHANCE FINDS</b></p> <p>The MLGRD shall adopt and implement the Chance Finds procedure described in the ESMF developed for the Project.</p> <p>In the event of a find or the observation of a cultural practice, the Project will follow the guidelines 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.</p>	Throughout Project implementation.	MLGRD/RDCU
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>



<b>MONITORING AND REPORTING</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
<b>10.1</b>	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b> The MLGRD through the RDCU shall adopt and implement the Stakeholder Engagement Plan (SEP) prepared for the Project.	Before Project commencement and throughout Project implementation	MLGRD/RDCU
<b>10.2</b>	<b>PROJECT GRIEVANCE MECHANISM</b> The MLGRD through the RDCU shall adopt, maintain and operate a grievance mechanism, as described in the SEP and ESMF.	Before project effectiveness date and throughout Project implementation	MLGRD/RDCU
<b>CAPACITY SUPPORT (TRAINING)</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
<b>CS1</b>	<b>Trainings to be provided</b> The MLGRD shall ensure that relevant project actors are trained in the following areas: <ul style="list-style-type: none"> <li>• The project’s GRM</li> <li>• Stakeholder roles and engagement</li> <li>• E&amp;S requirements (impacts and mitigation measures) of sub-projects</li> <li>• Subproject Environmental and Social screening</li> <li>• Occupational Health and Safety</li> <li>• Emergency preparedness and response</li> <li>• Training on COVID 19 transmission, prevention, preparedness and response</li> <li>• SEA/SH Risk Mitigation</li> <li>• Disability inclusion training</li> <li>• Documentation and reporting</li> </ul>	<b>Target Groups and Timeframe for Delivery</b> <ul style="list-style-type: none"> <li>• Training is required for all relevant project actors at the district (Desk officers and Community Development Officers, Works Engineers, Contractors and their Supervisors), and community levels (Facility Management Committee members)</li> <li>• This will be done before commencement of civil works, and periodic re-trainings throughout implementation, as needed</li> </ul>	MLGRD/RDCU