

REPUBLIC OF GHANA



**GULF OF GUINEA NORTHERN REGIONS SOCIAL
COHESION PROJECT**

**ENVIRONMENTAL AND SOCIAL COMMITMENT
PLAN**

March 2, 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Ghana (the “Recipient”) shall implement the Gulf of Guinea Northern Regions Social Cohesion Project (SOCO, P175043) (hereinafter the “Project”) through the Ministry of Local Government, Decentralisation and Rural Development (MLGDRD). The International Development Association (the “Association”) has agreed to provide financing for the Project.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs). To this end, this Environmental and Social Commitment Plan (ESCP) sets out material measures and actions to be carried out or caused to be carried out by the Recipient, including the timeframes for carrying out the actions and measures, the institutional, staffing, training, monitoring, and reporting arrangements, grievance management and the environmental and social assessments and instruments to be prepared or updated, disclosed, consulted, adopted, and implemented under the ESCP and ESSs, all in a manner acceptable to the Association.
3. The Recipient shall be responsible for compliance with all requirements of the ESCP even when the implementation of certain specific measures and actions is carried out by the Ministries or agencies or units referenced in paragraph 1 above.
4. The implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by the Recipient, in accordance with the requirements of the ESCP and the terms of the Legal Agreement, and the Association shall monitor and assess progress and completion of these material measures and actions throughout the implementation of the Project.
5. As agreed between the Association and the Recipient, the ESCP may be revised as necessary, during the Project implementation, to reflect the adaptive management of Project changes and unforeseen circumstances or in response to an assessment of the Project’s performance under this ESCP. In such circumstances, the Recipient shall agree to the changes with the Association and shall update the ESCP accordingly to reflect the agreed-upon changes. The Agreement on the amendments to the ESCP shall be documented by the exchange of letters signed by the Association and the Recipient. The Recipient shall promptly disclose the revised ESCP.

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
MONITORING AND REPORTING		
<p>A REGULAR REPORTING</p> <p>The Recipient shall prepare and submit to the Association regular environmental and social monitoring reports on the Environment, Social, Health and Safety (ESHS) performance of the Project including but not limited to: (i) the ESCP implementation; (ii) stakeholder engagement activities and the operation of SEA / SH sensitive grievance mechanism (s); (iii) the preparation and implementation status of the E&S instruments required under the ESCP.</p>	<p>Quarterly reports, starting from Effective Date, prepared throughout Project implementation.</p>	<p>Project Implementation Unit (PIU)</p>
<p>B INCIDENTS AND ACCIDENTS</p> <p>The Recipient shall promptly notify the Association of any incident or accident related to the Project that has, or is likely to have, a significant negative impact on the environment, the affected communities, the public and the Project workers. These incidents or accidents can be linked to: water and soil pollution, poisoning by pesticides, damage to the property of an individual or a community, the degradation of a particular ecosystem such as a protected area, incidents or accidents on the Project sites, land conflicts, labour migration, discrimination (for example, discrimination against women, young people, people with disabilities, and minority groups), the exclusion of vulnerable or disadvantaged individuals or groups, cases of SEA / SH, working conditions, child labour, forced labour, handling of Project-related complaints, etc.</p> <p>The Recipient shall provide the Association with sufficient details regarding the incident and/or accident, indicating the immediate measures taken or planned to remedy it, including any other information provided by a contractor and/or supervising entity, where appropriate.</p> <p>Subsequently, upon request of the Association, the Recipient shall prepare a report on the incident or accident and propose measures to</p>	<p>Notify the Association within 48 hours of becoming aware of the incident or accident.</p> <p>Ensure the provision of assistance to survivors of SEA / SH for medical care, psychosocial support and legal assistance by way of referral to relevant SEA/SH service providers in the Project area within 48 hours.</p> <p>This systematic reporting system shall remain in place throughout the Project implementation.</p> <p>A detailed report shall be prepared and provided within a maximum of 5 working days. The reporting of SEA/SH case reports shall be based on the principle of confidentiality and security of the survivor's identity and shall be kept in a secure location with limited access.</p>	<p>PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
	prevent its recurrence.		
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>As part of the contractors' and suppliers' contracts, contractors are required to provide the PIU with monthly site monitoring reports on ESHS aspects. These monthly reports shall be sent to the Association by the Recipient on request, if necessary.</p>	Monthly reports prepared from the signing of the contracts, throughout the duration of the Project's works.	<ul style="list-style-type: none"> - PIU -Contractors - Service Providers / Suppliers

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANISATIONAL STRUCTURE</p> <p>The Recipient shall establish and maintain an organisational structure, the Project Implementation Unit (PIU) within the MLGDRD with qualified staff and appropriate resources to support the management of ESHS risks of the Project.</p> <p>The PIU shall recruit or designate (i) an Environmental Safeguards Specialist and a Social Safeguards Specialist to ensure the implementation of the E&S instruments prepared under the Project; and (ii) a security focal point (and security consultants, when needed), charged with all security monitoring/management aspects, including liaison with the armed forces, local communities, and security audits of Project sites.</p> <p>The Recipient shall also designate Regional and District Level Environmental and Social Focal Points to support the PIU in the management of E&S risks at the local level. These specialists shall regularly report to the environmental safeguards Specialist and social safeguards specialists of the PIU regarding the environmental and social compliance of activities at the local level.</p> <p>The qualifications, experience, and terms of reference for the recruitment of all these E&S specialists and security focal point/consultants shall be approved by the Association.</p> <p>The Recipient shall ensure, through the coordinator of the Project, that the specialists in environmental and social safeguards carry out their missions relating to the environmental and social management of the Project, including the prevention and management of the SEA/SH risks and impacts, and in accordance with the Project Implementation Manual (PIM), consistent with ESSs and in a manner acceptable to the Association.</p>	<p>The PIU shall be set up no later than the Project Effective Date. Key staff of the national PIU (including the environmental safeguards specialist and the social safeguards specialist) should be seconded/appointed/ recruited no later than the Project Effective Date.</p> <p>Regional and District level environmental and social focal points within the MMDAs shall be appointed not later than six (6) months after the Effective Date</p> <p>Organisational structure, including E&S and security focal point, shall be maintained throughout Project implementation</p> <p>Throughout the implementation of the Project.</p>	<p>MLGDRD</p> <p>PIU</p> <p>MMDA</p> <p>PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>The Recipient shall prepare, disclose, consult, adopt and implement the Environmental and Social Management Framework (ESMF) and screen any proposed Project activity in accordance with the ESMF to identify and assess the risks and potential negative environmental and social impacts of the Project, (including, inter alia, security risks and SEA / SH), as well as appropriate mitigation measures. The ESMF will include an Integrated Pest Management Plan (IPMP).</p> <p>A particular emphasis shall be placed on consulting women’s groups to identify their needs and suggestions during the assessment and other vulnerable persons or groups to ensure the integration of their particular needs into the Project risks mitigation measures.</p>	<p>The ESMF (with IPMP) has been prepared, disclosed, consulted, and adopted on December 17, 2021, and shall be implemented thereafter throughout the Project implementation.</p>	<p>-PIU -MMDA</p>

1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>The Recipient shall develop, disclose, consult upon, adopt and implement the following risk assessment and management tools and instruments, in accordance with the ESSs and in a manner acceptable to the Association:</p> <ul style="list-style-type: none"> - Environmental and Social Management Framework (ESMF), including an Integrated Pest Management Plan (IPMP) - Resettlement Framework (RF); - Resettlement Plan (s) (RP) - Labor Management Procedure (LMP); - Stakeholder Engagement Plan (SEP), including the Grievance Mechanism (GM) at Project level; - Environmental and Social Management Plans (ESMPs), - The Security Risk Assessment (SRA) and the Security Management Plan (SMP); <ul style="list-style-type: none"> - Environmental and Social Impact assessments specific to each site (ESIA, with site-specific ESMPs, SEA / SH action plans, E&S Audit as needed); - SEA / SH Prevention and Management Action Plan - other instruments as may be required, during implementation. 	<p>SEP has been developed and disclosed before Project Appraisal.</p> <p>The ESMF (with IPMP), and RF have been developed, disclosed, consulted upon, and adopted on December 17 and 13, 2021, respectively.</p> <p>The LMP has been developed, disclosed, consulted upon, and adopted on February 17, 2022</p> <p>The SRA has been developed and adopted before the Project Appraisal.</p> <p>The SMP shall be developed and adopted no later than six (6) months after the Project Effective Date.</p> <p>Site-specific instruments shall be prepared, disclosed, consulted upon, and adopted prior to the start of any activity requiring the development of a specific E&S instrument and shall be thereafter implemented throughout Project implementation.</p> <p>The SEA / SH Prevention and Management Action Plan shall be developed, disclosed, consulted upon, and adopted no later than three (3) months after the Project Effective Date.</p> <p>All these instruments shall be implemented throughout the Project implementation.</p>	<p>PIU</p> <p>MMDA</p>
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>The Recipient shall incorporate the relevant aspects of this ESCP, including the relevant E&S instruments and/or plans, as well as the LMP, into the ESHS specifications of the procurement documents and contracts with the contractors and Supervising Engineers.</p> <p>The Recipient shall ensure that contractors/ service providers (i) comply with the ESHS specifications of their respective contracts, and (ii) ensure that their subcontractors comply with the ESHS specifications of their respective contracts in accordance with the management tools and instruments referred to in section 1.3 above.</p>	<ul style="list-style-type: none"> • During the preparation of the procurement documents and before the start of the relevant services or works. • Implementation and maintenance of these measures throughout the Project implementation • Supervise contractors and supervising Engineers, throughout the Project implementation. 	<p>PIU</p> <p>MMDA</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
1.5	<p>THIRD-PARTY MONITORING</p> <p>The Recipient shall mobilise, if necessary, local relevant regulatory authorities, and MMDAs involved in the Project, NGOs, community organisations, etc., to update or verify the monitoring information to monitor the environmental and social performance of the Project consistent with ESSs and in a manner acceptable to the Association.</p> <p>The results of their monitoring shall be included in the quarterly reports, which the Recipient shall prepare and provide to the Association as part of its regular reporting.</p> <p>The Recipient shall also recruit national or international experts to monitor and verify the compliance of the risk management of SEA / SH and security risks as part of the Project to visit and monitor the Project area, collect relevant data and communicate with Project stakeholders and beneficiaries, if applicable, all with terms of reference, qualifications, and experience acceptable to the Association.</p> <p>The Recipient shall require the third-party consultant, responsible for monitoring, to prepare and submit monitoring reports, which shall be promptly made available to and discussed with the Association, and shall promptly take any measures that may be requested by the Association upon its review of the third-party monitor consultant reports.</p>	<ul style="list-style-type: none"> • Throughout the project implementation • As part of the quarterly reporting as per Section A of this ESCP • Within the timeframes requested by the Association 	<p>PIU Third-Party Monitor</p>
1.6	<p>TECHNICAL ASSISTANCE</p> <p>The Recipient shall ensure that consultancies, studies, capacity and skills building, training and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, which incorporate the relevant ESSs requirements.</p> <p>Ensure that any outputs of technical assistance activities are consistent with the ESSs.</p>	<p>Throughout the project implementation</p>	<p>PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
1.7	<p>CONTINGENT EMERGENCY RESPONSE COMPONENT (CERC):</p> <p>a) The Recipient shall ensure that the CERC Operations Manual as specified in the Financing Agreement includes a description of the ESHS assessment and management arrangements and prepare an ESMF Addendum for the implementation of the CERC component in accordance with the ESSs. The ESMF Addendum shall be approved by the Association.</p> <p>b) In the event of a crisis leading to the activation of the CERC, the Recipient shall prepare, disclose, consult, and adopt other relevant E&S instruments that may be required for activities under the CERC component of the Project, in accordance with the ESMF Addendum and ESSs, and then implement the measures and actions required by said E&S instruments within the timeframes specified in said E&S instruments.</p>	<p>a) The ESMF Addendum shall be developed, disclosed, consulted, and adopted before CERC activities implementation activation.</p> <p>b) Submit the required E&S instrument to the Association's prior review and approval and adopt it prior to carrying out the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout the Project implementation.</p>	PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>The Recipient shall develop, adopt, and implement the Labour Management Procedures (LMP) prepared for the Project (including, inter alia, the prohibition of SEA/SH, child labour, and forced labour) in accordance with the requirements of ESS2 and in a manner acceptable to the Association.</p>	<ul style="list-style-type: none"> The LMP has been developed, disclosed, and adopted on February 17, 2022, and shall be implemented throughout Project implementation. 	PIU MMDA
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>The Recipient shall establish and maintain, operationalise a grievance mechanism (GM) for project workers, sensitive to SEA/SH, as described in the LMP, in accordance with the provisions of the ESS 2 and the applicable national legislation.</p> <p>The Recipient shall ensure that workers who use this GM are not subjected to any form of discrimination or retaliation from employers.</p>	<ul style="list-style-type: none"> The GM shall be established, and operationalised prior to engaging Project workers, and shall be maintained throughout the Project implementation. 	PIU MMDA/ Contractor
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>The Recipient shall prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESIA/ESMP and ensure that the Project contractors develop and implement an OHS plan, all in accordance with national requirements and good international industry practice, and ESS2 and in a manner acceptable to the Association.</p>	<ul style="list-style-type: none"> To be developed and adopted before the start of the work. These measures must be maintained throughout the Project implementation. 	PIU MMDA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
2.4	<p>EMERGENCY PREPAREDNESS AND RESPONSE</p> <p>The Recipient shall adopt and implement emergency preparedness and response measures and reflect those measures in the Project ESMF and ESIA / ESMP.</p> <p>The Recipient shall ensure that the Project contractors prepare, adopt, and implement an emergency preparedness and response plan. The emergency situations of each sub-project, in particular community-based public works, shall be identified in the ESIA reports and Contractor's ESMP (C-ESMP) or in an ESMP for community-driven development work (CDD), as well as the measures for their prevention and management shall be notified in said reports.</p> <p>The Recipient shall immediately report any major emergency (e.g., spills, attacks, pollution, accidents causing significant damage) in accordance with section B of this ESCP.</p>	<ul style="list-style-type: none"> • Prior to the start of works and throughout the Project. 	<p>-PIU/ MMDA</p> <p>- Supervising Engineer.</p> <p>- Suppliers and Contractors</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>RESOURCE EFFICIENCY:</p> <p>The Recipient shall develop, adopt, implement rationalisation measures on raw materials, energy and water use and the maintenance of its quality, and reflect those measures in the Project ESMF and ESIA/ESMPs, to manage efficient consumption of these resources in accordance with ESS3 and in a manner acceptable to the Association.</p>	<p>Measures shall be adopted prior to the start of works and implemented and maintained throughout the Project implementation.</p>	<p>PIU MMDA</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
3.2	<p>POLLUTION PREVENTION AND MANAGEMENT:</p> <p><i>Waste and Hazardous Materials Management:</i> The Recipient shall develop, adopt, implement measures and reflect those measures in the Project ESMF and ESIA/ ESMPs, to manage waste and hazardous materials in accordance with ESS 3 and in a manner acceptable to the Association.</p> <p>The Recipient shall avoid producing waste. Where it cannot be avoided, the Recipient shall work to minimise the generation of waste and to reuse, recycle and recover such waste in a way that does not pose a risk to human health and the environment. If the waste cannot be reused, recycled, or recovered, the Recipient must treat, destroy, or dispose of such waste in a safe and environmentally friendly manner, in particular by satisfactory control of emissions and residues resulting from handling and waste treatment, all in accordance with the ESS 3 requirements.</p> <p>The Recipient shall ensure that contractors and develop, adopt, and implement a waste and hazardous materials management plan (common and specific waste) in accordance with the provision of the ESMF and site-specific ESIA/ESMP in a manner acceptable to the Association.</p> <p><i>Pesticides management:</i> The Recipient shall ensure that the prevention and management measures for risks and potential impacts provided for in the Integrated Pest Management Plan (IPMP) annexed to the ESMF are applied consistent with ESS3. Likewise, the Recipient shall ensure, as part of the environmental and social assessment of each sub-project, that all sources of pollution (liquids, solids, and gases) are identified and analysed, and that appropriate specific mitigation measures are developed and implemented, in accordance with the provisions of ESS 3 and in a manner acceptable to the Association.</p>	<p>The measures shall be adopted before the actual start of the relevant works. These measures and actions shall be maintained and implemented throughout the implementation of the Project.</p>	<p>PIU</p>
<p>ESS 4: COMMUNITY HEALTH AND SAFETY</p>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>The Recipient shall develop, adopt, and implement measures and actions and it shall also ensure that contractors / supervising entities develop, adopt and implement measures and actions to assess and manage traffic and road safety risks (including, among others, a road traffic and safety plan, in particular, a plan for the movement of construction equipment and detour routes), in accordance with ESS 4 requirements.</p>	<ul style="list-style-type: none"> • Prior to the start of works and maintained throughout Project implementation 	<p>-PIU</p> <p>-Supervising Engineer</p> <p>-Contractors</p>
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>The Recipient shall develop, adopt, and implement measures and actions to assess and manage community health and safety risks and impacts, and it shall also ensure that the Contractors/supervising entities develop, adopt, and implement measures and action to assess and manage the following Project-related risks and impacts, in accordance with ESS 4 requirements and in a manner acceptable to the Association.</p> <p><i>SEA / SH risks</i></p> <p>The Recipient shall develop, disclose, consult upon, adopt, and implement the SEA / SH prevention and mitigation action plan and reflect those measures in the ESIA/ESMPs, to manage the risks of SEA/SH.</p> <p><i>Risks associated with the spread of COVID-19</i></p> <p>The Recipient shall develop, disclose, consult upon, adopt, and implement the action plan as part of the ESIA/ESMP for the prevention and management of risks related to the spread of COVID-19, prepared in order to manage this risk on all Project work sites.</p> <p><i>Security risks</i></p> <p>The Recipient shall assess the security risks through the security risk assessment (SRA), and, thereafter, develop, adopt and implement the Security Management Plan (SMP), prepared for the Project, to manage the risks of recurring security incidents and threats under the Project, all in accordance with the requirements of ESS 1 and ESS 4 and in a manner acceptable to the Association.</p>	<p>Prior to the start of works, these measures shall be implemented throughout the implementation of the Project.</p> <p>The SEA / SH Prevention and Management Action Plan shall be developed, disclosed, consulted upon, and adopted no later than three (3) months after the Project Effective Date.</p> <p>Three (3) months after Project Effective Date and throughout the Project implementation. The COVID-19 prevention action plan shall be updated as necessary to respond to the contexts of the sub-project areas.</p> <p>The SMP shall be developed and adopted no later than six (6) months after the Project Effective Date and implemented throughout the Project implementation. The action plan shall be updated as needed, depending on the evolution of the security context of sub-projects areas.</p>	<p>-PIU/ MMDA</p> <p>-Supervising Engineer</p> <p>-Contractors</p>

<p>4.3</p>	<p>SECURITY PERSONNEL</p> <p>The Recipient shall 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.</p> <p>The following measures shall be adopted to ensure that the engagement of security personnel in the implementation of Project activities) for provision of security of Project workers, sites and/or assets, is carried out in accordance with ESS 4:</p> <ol style="list-style-type: none"> a. Assess the risks, impacts of engaging security personnel, and implement measures to manage these risks and impacts, guided by the principles of proportionality and good international industry practices, and by applicable law, with regard to the recruitment, rules of conduct, training, equipping and monitoring of such security personnel; b. Adopt and apply standards, protocols and codes of conduct for the selection and use of security personnel, and screen such personnel to verify that they have not engaged in illegal or abusive behaviour in the past, including SEA / SH or excessive use of force; c. Ensure that such personnel is properly instructed and trained, prior to deployment and on a regular basis, on the use of force and proper conduct, as outlined in the Project Operational Manual, ESMF, and Security Management Plan. d. Ensure that the stakeholder engagement activities under the SEP include a communication strategy on the involvement of security personnel in the Project; e. Ensure that any concerns or grievances regarding the conduct of security personnel are received, monitored, documented (considering the need to protect confidentiality), resolved through the Project grievance mechanism (see action 10.2 below) and reported to the Association no later than two (2) days after being received; and f. When the Association so requires, after consultation with the Recipient: (i) promptly appoint a third-party monitoring consultant, whose terms of reference, qualifications and experience are satisfactory to the Association, in order to visit and monitor the Project area where security personnel are deployed, collect relevant data and communicate with Project stakeholders and beneficiaries; (ii) request the third-party consultant in charge of monitoring to prepare and submit monitoring reports, which shall be quickly made available to the Association and discussed with it; and (iii) promptly take any action requested by the Association after examining the reports of the monitoring third party consultants. 	<p>Before the effective start of activities</p> <p>During and after the execution of the Project.</p>	<p>- PIU</p> <p>- Contractors, supervising entity</p> <p>-Security services</p>
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT FRAMEWORK AND RESETTLEMENT PLANS</p> <p>The Recipient shall develop, disclose, consult, adopt and implement a Resettlement Framework (RF) for the Project, in accordance with ESS 5, ensuring that women and other vulnerable persons and groups have equal access to resettlement-related opportunities and compensations and that any risks potentially associated with resettlement are considered in the RF, in a manner satisfactory to the Association.</p> <p>Where appropriate, develop, disclose, consult, adopt and implement a site-specific Resettlement Plan (RP) for identified sites as provided in the RF and consistent with ESS 5. All RPs must be approved by the Association and disclosed nationally and on the Association's Website.</p>	<ul style="list-style-type: none"> The RF has been prepared, disclosed, consulted, and adopted on December 13, 2021, and shall be implemented throughout the Project implementation. Submit the respective RP for the Association's prior review and approval, disclose, adopt, and thereafter implement the respective RP, prior to the start of Project activities or works to which RP relates 	<p>-PIU</p> <p>- Land Valuation Division of the Land Commission under Ministry of Lands and Natural Resources</p>
5.2	<p>MONITORING AND REPORTING ON RESETTLEMENT ACTION PLANS</p> <p>The Recipient shall prepare an implementation report for the monitoring of any land acquisition and resettlement activities.</p> <p>This report shall be submitted to the Association for approval before the start of the relevant work.</p>	<ul style="list-style-type: none"> Implementation report shall be submitted to the Association for approval before the start of the relevant works. 	<p>-PIU</p> <p>-Implementing agency</p> <p>-NGO</p>
5.3	<p>GRIEVANCE MECHANISM (GM)</p> <p>The Recipient shall ensure that the Project RF and site-specific RPs reflect the Project GM and are sensitive to SEA/SH. The grievance mechanism to address resettlement-related complaints as shall be described in the RF, RPs and SEP and shall be completed before the commencement of project activities. The GM shall incorporate existing GM systems in place at the implementing agencies and the local level.</p> <p>This GM shall be operational and accessible to all those affected by land acquisition and resettlement activities.</p>	<ul style="list-style-type: none"> Prior to the start of implementation of Project activities 	<p>-PIU</p> <p>-Implementing agency</p> <p>-NGO</p>
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>The Recipient shall ensure that the Project ESMF and ESIAs/ESMPs include measures and actions to identify, assess and manage risks and impacts on biodiversity, including the identification of different habitat types and the determination of the circumstances in which compensation could be used, all in accordance with ESS6 requirements and in a manner acceptable to the Association.</p> <p>Procurement documents and contracts with contractors and supervising entities shall include such measures. The Recipient shall ensure that contractors thereafter adopt and implement these measures consistent with ESS6 and in a manner acceptable to the Association.</p>	<ul style="list-style-type: none"> • Prior to the start of Project activities and maintained throughout Project implementation 	PIU/ MMDA
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Currently not relevant		
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS</p> <p>The Recipient shall develop, adopt and implement a management plan for the cultural heritage that may be affected by the Project, if any, as well as procedures relating to chance finds as described in the ESMF, all consistent with ESS8 requirements. Clauses on these “chance finds” shall be included in all works contracts, even in cases where the probability is very low.</p> <p>“Chance finds” procedures shall also be carried out by the PIU, in collaboration with the communities for the activities to be implemented by the community workers and as part of the CDD approach.</p> <p>The ESMF proposes a procedure in the event of the “chance finds” of cultural remains, in accordance with national legislation and the practices of the ministry or agency responsible for the protection of cultural heritage to assist to preserve such finds. Likewise, any ESIA / ESMP to be prepared shall include such a section on cultural heritage. These measures shall be consistent with ESS 8 requirements.</p>	<ul style="list-style-type: none"> • Before the start of relevant Project activities and throughout the work. 	PIU/ MMDA

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
ESS 9: FINANCIAL INTERMEDIARIES		
Currently not relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		
<p>10.1 STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>The Recipient shall prepare, disclose, consult upon, adopt and implement the Stakeholder Engagement Plan (SEP) prepared for the Project, including 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, all in accordance with ESS10 and in a manner acceptable to the Association.</p> <p>The Project shall track the SEP and other Citizen Engagement mechanisms under the Project.</p> <p>When necessary and agreed with the Association, the Recipient shall recruit a local NGO or a local specialised agency to support the implementation and monitoring of the SEP.</p>	<ul style="list-style-type: none"> • SEP has been prepared and disclosed prior to Project Appraisal and shall be finalised and adopted prior to the Effective Date • SEP shall be implemented throughout Project implementation 	PIU/MMDA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>The Recipient shall, establish, disclose, maintain and operate an accessible Grievance Mechanism (GM), in order to receive and facilitate the resolution of concerns and grievances related to the entire Project, promptly and effectively, in a transparent, culturally appropriate and readily accessible manner to all Project-affected-parties, at no cost and without retribution, including concerns and grievances filed anonymously, all in accordance with the ESS 10.</p> <p>The GM shall also receive, register, and address concerns and complaints related to SEA / SH in a safe and confidential manner, with specific entry points for survivors and ensure a referral system to provide assistance to survivors as required, through identified GBV service providers in the Project area.</p> <p>The GM shall be supported by a communication plan to ensure that the local populations affected by the Project are aware of the existence of this mechanism and know the procedures for filing and handling complaints and other remedies.</p>	<ul style="list-style-type: none"> • The GM shall be operational before Project Effective Date. • The GM shall be maintained and shall remain operational throughout Project implementation. 	<p>- PIU</p> <p>-Psychosocial and legal assistance centres</p>
CAPACITY SUPPORT (TRAINING)			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
11.1	<p>TRAININGS TO BE PROVIDED</p> <p>Training on environmental and social standards</p> <ul style="list-style-type: none"> - ESS 1 : Assessment and management of environmental and social risks and impacts - ESS 2: Labor and working conditions and the LMP - ESS 3: Resource Efficiency and Pollution Prevention and Management - ESS 4 : Community Health and Safety and SRA and SMP - ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement - ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources -ESS 8: Cultural heritage -ESS 10: Stakeholder Engagement and Information Disclosure and the SEP <p>The training shall target personnel from the following entities:</p> <ul style="list-style-type: none"> -Project Steering Committee / Committee for Regional Coordination -PIU (Social safeguards specialist, Environmental safeguards specialist, Security focal point, Procurement specialist) -NGO working in the environmental and social fields in the project areas -Relevant Technical entities - Environmental Protection Agency (EPA) - District Desk officers - other relevant district authorities, including Social Welfare and Community Development Officers, Engineers from the Department of Works, Contractors, and their supervisors) 	<p>Three (3) months after the recruitment of environmental and social, and security focal point and once every six (6) months throughout the implementation of the Project</p>	<p>PIU with the support of other consultants/ Training Center engaged by the Project if necessary.</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
<p>11.2 Occupational health and safety training: Contractors and supervising entities shall train all workers involved in Project activities, including security personnel, on occupational health and safety, first aid equipment, prevention of emergencies and how to prepare for and react to such situations.</p> <p>Contractors must also ensure that the workers of their subcontractors are trained on the same subjects.</p> <p>The training shall target the following elements:</p> <ul style="list-style-type: none"> - Contractors - Contractors Workers (including subcontractors) -Community workers - Supervising entities - PIU <p>Information, Education and Communication (IEC) Raise awareness among contractors’ workers, including subcontractors workers, and Supervising entity mobilised on the sites of environmental and social standards as well as on respect for anti-COVID-19 barrier gestures.</p>	<p>Prior to the start of employment of newly recruited workers and those already working, training would be provided quarterly to ensure that all staff are trained.</p> <p>Throughout the implementation of the Project</p>	<p>PIU</p>
<p>11.3 Training on labour and working conditions</p> <ul style="list-style-type: none"> - Conditions of employment under national labour law; - Code of conduct for suppliers/service providers and subcontractors; - workers' organisations; - Rules on child labour and minimum working age; - Workers' rights - Worker complaints and SEA / SH complaints -Discrimination and harassment / SEA / SH incidence <p>The training shall target the following actors:</p> <ul style="list-style-type: none"> - Company workers (including any subcontractors) - Community workers - Supervising Engineers; - NGOs working in the social field in the Project area. 	<p>Prior to the start of employment of newly recruited workers and those already working, training would be provided quarterly to ensure that all staff are trained.</p>	<p>PIU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
<p>11.4 Training on environmental and social management</p> <p>This training shall provide knowledge on:</p> <ul style="list-style-type: none"> - the process of environmental and social selection and classification of sub-projects; - the procedures for organising and carrying out the ESIA and the RP; - environmental policies, procedures and legislation in Ghana; - Implementation monitoring process of the ESMP and the RP. <p>The training shall target the following actors:</p> <ul style="list-style-type: none"> -PIU (social safeguards specialist, environmental safeguards specialist, security focal point/ consultant, procurement specialist) - Regional and District level environmental and social focal points - EPA -national and local technical structures involved in the Project; 	<p>Prior to the start of employment of newly recruited workers and those already working, training would be provided annually to ensure that all staff are trained.</p>	<p>PIU</p>
<p>11.5 Training on the grievance mechanism</p> <p>The training shall focus on the following modules:</p> <ul style="list-style-type: none"> - Registration and processing procedure; - Complaint’s resolution procedure; - Documentation and handling of complaints; - Use of the procedure by the various stakeholders; - SEA / SH complaints. <p>The training shall target the following actors:</p> <ul style="list-style-type: none"> -PIU (Social safeguards specialist, environmental safeguards specialist, security focal point/consultant, procurement specialist), -Local or regional follow-up or grievance management committees. -Relevant Technical entities - EPA - Relevant territorial authorities. -NGOs working in the social field in the Project area 	<p>Prior to the start of employment of newly recruited workers and those already working, training would be provided quarterly to ensure that all staff are trained.</p>	<p>PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE AUTHORITY / ENTITY
11.6	<p>SEA / SH Risk Training</p> <ul style="list-style-type: none"> - Awareness and measures to prevent and mitigate the risks of SEA / SH; Themes, activities and target audiences shall be defined in the SEA / SH action plan; -Dissemination of the SEA / SH action plan (activities, target groups); SEA / SH complaint handling <p>The training shall target the following actors:</p> <ul style="list-style-type: none"> -PIU (Environmental safeguards specialist, social safeguards specialists, security focal point/consultant, Procurement Specialist, Specialist in Monitoring and Evaluation), -National and local technical structures, - EPA - Relevant district authorities. - NGOs working in the social field in the Project area 	<p>Prior to the start of employment of newly recruited workers and those already working, training would be provided quarterly to ensure that all staff, actors and stakeholders involved are trained.</p>	PIU
11.7	<p>Training on risks and management during works targeting workers</p> <ul style="list-style-type: none"> -SEA / SH, child and forced labour; - GM - including the SEA /SH related grievance mechanism; - Compliance with the code of conduct clearly mentioning the prohibition of SEA / SH and the penalties in the event of misconduct, etc. -Pollution and damage during the Project works, -Occupational Health and Safety. 	<p>Subcontractors' workers</p> <p>Before the start of work and organise regular refresher sessions</p>	<ul style="list-style-type: none"> - PIU - Contractors
11.8	<p>Information/awareness on potential environmental and social risks targeting local populations/communities:</p> <p>Information/awareness on potential environmental and social risks, including the Project SEA / SH, to elicit their commitment and participation in the identification of measures aimed at minimising and mitigating negative environmental and social risks and impacts related to Project implementation.</p>	<p>Before the start of the works and throughout the implementation of the Project</p>	<ul style="list-style-type: none"> - PIU - Contractors - Supervising engineer, supervising entity