

**REPUBLIC OF GHANA**



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

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

**March 3, 2021**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Ghana (the **Recipient**) will implement the Ghana Productive Safety Net Project 2 (the **Project**), with the involvement primarily of the following Ministries and entities: Ministry of Local Government, Decentralization, and Rural Development (MLGDRD), the Ministry of Gender, Children and Social Protection (MoGCSP), and the MLGDRD Rural Development Coordinating Unit (RDCU). The International Development Association (hereinafter the Association) has agreed to provide financing for the Project.
2. The Government of Ghana shall 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.
3. The Government of Ghana shall also comply with the provisions of any other environmental and social (E&S) documents required under the Environmental and Social Framework (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.
4. 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.
5. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by the Government of Ghana as required by the ESCP and the conditions of the legal agreement, and the Association shall monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association 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, through the MLGDRD and the MoGCSP, shall agree to the changes with the Association and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Association and the Government of Ghana (through the MLGDRD and the MoGCSP). The Government of Ghana (through the MLGDRD and the MoGCSP) shall promptly disclose the updated ESCP.
7. 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, but are not limited to, environmental, health and safety impacts, and gender-based violence.

<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>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project. The report shall include but not be 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, and functioning of the grievance mechanism(s).</p>	Quarterly, six-monthly and annually throughout Project implementation.	MLGDRD/ MoGCSP
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including but not limited to 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), and communicable diseases and infections.</p> <p>The report shall 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 Association request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Association within 48 hours after learning of the incident or accident.</p> <p>A report shall be provided within a timeframe acceptable to the Association, as requested</p>	MLGDRD/RDCU/ MoGCSP
C	<p><b>CONTRACTORS MONTHLY REPORTS</b></p> <p>Contractors shall be required to provide monthly monitoring reports, including E&amp;S report to the RDCU.</p>	The reports shall be submitted to the RDCU on a monthly basis, and to the Association upon request.	MLGDRD/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>
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>The MLGDRD, 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 of the Project, including one Environmental and Social Safeguards Specialist.</p>	This organizational structure shall be maintained throughout Project implementation.	MLGDRD/RDCU

MONITORING AND REPORTING		
MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>The Environmental and Social Safeguard Specialists and Gender Officer currently implementing the GH- Productive Safety Net Project (GPSNP, P164603) shall provide E&amp;S support for risk identification, management and reporting for GPSNP-2. These E&amp;S staff shall be supported by Environmental and Social Safeguards Officers at the Zonal level to implement the Project and shall be adequately resourced to support the management of E&amp;S risks. The RDCU shall also hire external expertise and consultancy services, where necessary to ensure that E&amp;S risks are adequately assessed and managed. This structure shall be maintained throughout project implementation.</p>		
<p>1.2 <b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b>            Prepare, disclose, consult upon, and thereafter 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 Association. ESMF shall include the Labor Management Procedures (LMP) and Integrated Pest Management Plan IPMP. It shall address all relevant E&amp;S risks relevant to the Project in a proportionate manner, including such risks as local labour issues, localized economic displacement arising from land use, community health and safety, social inclusion for the poorest and most vulnerable, sexual harassment and sexual exploitation and abuse, ensuring citizen engagement, and social inclusion to prevent elite capture of Project interventions.</p> <p>Labor-Intensive Public Works (LIPW) and other subprojects shall be screened for Environmental and Social risks and impacts in accordance with the ESSs and the ESMF, in a manner acceptable to the Association. As required by the screening results, detailed Environmental and Social Impact Assessments (ESIAs) shall 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>• ESMF to be adopted prior to commencing of the relevant Project activities.</li> <li>• ESMF to be maintained and implemented throughout Project implementation.</li> </ul>	MLGDRD/RDCU

<b>MONITORING AND REPORTING</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
1.3	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>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 tools or instruments, including Resettlement Plans, in accordance with the ESSs, the ESMF and in a manner acceptable to the Association.</p>	<ul style="list-style-type: none"> <li>Any required ESIAs/ESMPs/RAPs shall be prepared and submitted for the Association's approval before launching the bidding process for the respective subproject. Once approved, the ESMPs shall be carried out throughout Project implementation.</li> <li>RAP shall be implemented before commencement of relevant construction activities.</li> </ul>	MLGDRD/RDCU
1.4	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP and ESMF, including relevant E&amp;S documents and plans, the Labor Management Procedures, and worker code of conducts, into the ESHS specifications of the procurement documents with contractors. Thereafter, Recipient shall 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>	MLGDRD/RDCU
1.5	<p><b>PERMITS, CONSENT AND AUTHORIZATION</b></p> <p>Secure relevant permits, consents and authorizations applicable to the subproject activities from relevant national authorities and agencies.</p> <p>Comply or cause to comply, as appropriate, with the conditions established in these permits, consents and authorizations throughout Project implementation.</p>	Obtain permits, consents, and authorizations before commencing relevant Project activities. Thereafter, implement and comply with permits, consents, and authorizations throughout Project implementation.	MLGDRD/RDCU
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>

MONITORING AND REPORTING			
MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Consistent with ESS2 and in a manner satisfactory to the Association, update, adopt, and implement the Labor Management Procedures (LMP) that have been developed for the Project as part of ESMF. Include in the LMP provisions for direct, contracted, and community workers, including but not limited worker GRM and code of conducts. The LMPs shall include hiring procedures that 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.</p> <p>The LMP shall be referenced in the ESHS specifications of the procurement documents, and contractors shall be required to adopt and implement the project’s environmental and Social guidelines and specifications during implementation consistent with the Project’s ESHS requirements.</p>	Throughout Project implementation.	MLGDRD/RDCU
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Require contractors to maintain and operate, and ensure that they maintain and operate, a Project grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Grievance mechanism shall be operational prior to engaging Project workers and maintained throughout Project implementation.	MLGDRD/RDCU
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESMF, in accordance with national requirements and GIIP. The OHS plan shall include COVID-19 prevention and response measures as well as road safety measures in accordance with action 4.1 of this ESCP.</p> <p>Require contractors working on the Project to abide, and ensure that they abide, by the approved occupational, health and safety (OHS) plan and measures.</p> <p>The Project E&amp;S Specialist shall train employees of Project contractors on OHS aspects relevant to the Project on a regular basis.</p>	OHS measures shall be prepared and adopted prior to commencement of construction activities and shall be implemented throughout Project implementation.	MLGDRD/RDCU

<b>MONITORING AND REPORTING</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
2.4	<p><b>EMERGENCY PREPAREDNESS AND RESPONSE (OHS) MEASURES</b></p> <p>As part of the OHS measures specified above in 2.3 and consistent with ESS2, adopt and implement measures on Emergency Preparedness and Response, including to ensure that workers and contractors are trained on emergency preparedness and response on a regular basis, drills are conducted regularly, and the relevant emergency plans are implemented.</p>	<ul style="list-style-type: none"> <li>Plans to be adopted prior to initiation of subprojects involving construction, and maintained throughout Project implementation</li> <li>Training to be conducted within 60 days of the plans' adoption and repeated regularly throughout Project implementation.</li> </ul>	MLGDRD/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 consistent with ESS3 shall be integrated in the ESMF and other E&amp;S instruments, and shall be complied with by the Recipient and contractors throughout Project implementation. Specific measures shall be included in the ESMPs that will be prepared before commencement of any civil work. These measures shall address such risks as soil erosion, water pollution, use of pesticides, dust generation, and solid waste management.</p> <p>Integrated Pest Management Plan (IPMP) annexed to the ESMF shall be implemented by the Project during implementation.</p>	Same timeframes as those specified under section 1 of this ESCP for the adoption and implementation of the ESMF and ESMPs.	MLGDRD/RDCU
<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>Consistent with ESS4 and ESMF, and in a manner acceptable to the Association, Project contractors shall be required to implement measures and actions in the subproject checklist/technical specifications to assess and manage traffic and road safety risks.</p>	Prior to implementation of relevant Project activities. Maintained throughout Project implementation	MLGDRD/RDCU

<b>MONITORING AND REPORTING</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
4.2	<p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>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 required by the ESMF, in a manner acceptable to the Association.</p> <p>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. Submit the COVID-19 Response Plan for the Association's approval before commencement of field activities. Once approved, the Plan shall be implemented throughout Project implementation.</p>	MLGDRD/RDCU
4.3	<p><b>GBV AND SEA RISKS</b></p> <p>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), building on the Gender Inclusion Plan prepared under GPSNP.</p>	<p>Submit the GBV Action Plan for the Association's approval before the commencement of field activities. Once approved, the GBV Action Plan shall be implemented throughout Project implementation.</p>	MLGDRD/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>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 relevant Project activities, in a manner acceptable to the Association.</p>	<p>RAPs shall be submitted for the Association's approval and, once approved, implemented prior to commencing Project activities that involve land acquisition and resettlement.</p>	MLGDRD/RDCU
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 shall be completed before commencement of Project activities. The GRM shall incorporate existing GPSNP GRM systems in place at the implementing agencies and the local level.</p>	<p>Prior to commencement of resettlement activities and maintained throughout Project implementation.</p>	MLGDRD/RDCU



<b>MONITORING AND REPORTING</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
5.3	<b>MONITORING AND REPORTING ON RESETTLEMENT ACTION PLANS</b> 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.	Quarterly throughout implementation of RAPs	MLGDRD/RDCU
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b> Avoid adverse impacts on biodiversity and habitats. Where avoidance of such impacts is not possible, adopt and implement measures and actions for biodiversity impact mitigation as required by the ESMF and consistent with ESS6.	Throughout Project Implementation	MLGDRD/RDCU
<b>ESS 8: CULTURAL HERITAGE</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
8.1	<b>CHANCE FINDS</b> Adopt and implement the Chance Finds procedure included in the ESMF developed for the Project, consistent with ESS8.  In the event of a find or the observation of a cultural practice, comply with the procedures detailed in the ESMF and contact the relevant government agencies that are entrusted with the protection of cultural heritage in Ghana to assist with the preservation of such finds.	Throughout Project implementation.	MLGDRD/RDCU
<b>ESS9: FINANCIAL INTERMEDIARIES – Not currently relevant.</b>			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b> Adopt and implement the Stakeholder Engagement Plan (SEP) prepared for the Project.	Before Project commencement and throughout Project implementation.	MLGDRD/RDCU
10.2	<b>PROJECT GRIEVANCE MECHANISM</b> Adopt, maintain and operate a grievance mechanism, as described in the SEP and ESMF.	Before Project Effectiveness and throughout Project implementation.	MLGDRD/RDCU

MONITORING AND REPORTING			
MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
CAPACITY SUPPORT (TRAINING)			
MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
CS1	<p><b>Trainings to be provided</b></p> <p>Ensure that relevant project workers and community members are trained in the following areas:</p> <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) for sub-projects</li> <li>• Subproject Environmental and Social screening</li> <li>• Occupational Health and Safety</li> <li>• Emergency preparedness and response</li> <li>• 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>	<p><b>Target Groups and Timeframe for Delivery</b></p> <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>• Training shall be completed before commencement of civil works, and repeated in periodic re-trainings throughout Project implementation, as needed</li> </ul>	MLGDRD/RDCU
	<b>Contingent (Emergency) Response Financing</b>		

<b>MONITORING AND REPORTING</b>		
<b>MATERIAL MEASURES AND ACTIONS</b>	<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
<p>Ensure that the CERC-ESMF includes a description of the ESHS assessment and management arrangements and procedures for the activation and implementation of the CERC under the project in accordance with the ESSs.</p> <p>Prepare, disclose, consult, adopt, and implement any environmental and social (E&amp;S) management plans or other instruments required for the respective Project activities based on the assessment process, in accordance with the ESSs, CERC-ESMF, the EHSGs, and other relevant Good International Industry Practice (GIIP) including WHO guidance documents on COVID-19 in a manner acceptable to the Association. Thereafter implement the measures and actions required under the said E&amp;S management plans or instruments, within the timeframes specified in the plans.</p>	<p>The CERC manual will be developed within 3 weeks of when it is triggered during an emergency.</p>	<p>MLGDRD/ RDCU</p> <p>MoGCSP/ PCU</p>