

REPUBLIC OF GHANA



**GHANA PRODUCTIVE SAFETY NET PROJECT 2
ORIGINAL FINANCING (P175588)
AND
ADDITIONAL FINANCING (GPSNP 2 AF) (P180659)**

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

Negotiated

April 26, 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Ghana (the Recipient) is implementing the Ghana Productive Safety Net Project 2 (GPSNP 2) (the Project), with the involvement of the Ministry of Local Government, Decentralization and Rural Development (MLGDRD) and the Ministry of Gender, Children and Social Protection (MoGCSP), as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide the original financing (P175588) and additional financing (P180659) for the Project, as set out in the referred agreement. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for Project referred to above.
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 Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the MLGDRD and the MoGCSP and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Chief Director of the MoGCSP and Chief Director of the MLGDRD. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s)</p>	<p>Submit, semi-annual and annual reports to the Association throughout Project implementation, commencing after the Effective Date.</p> <p>Submit each report to the Association no later than 30 days after the end of each reporting period.</p>	<p>Coordination units of both Ministries (MLGDRD, MOGCSP)</p>
B	<p>INCIDENTS AND ACCIDENTS</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, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury [specify other examples of incidents and accidents, as appropriate for the type of operation]. Provide sufficient detail regarding the scope, severity, and possible causes of 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/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident and within 24 hours for SEA/SH incidents and fatalities.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association (not more than 1 month after the incident/accident)</p>	<p>Coordination units of both Ministries (MLGDRD, MOGCSP)</p>
C	<p>CONTRACTORS’ MONTHLY REPORTS</p> <p>Require caterers and contractors and supervising firms (for the labour-intensive public works) to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	<p>Submit the monthly reports to the Association upon request as annexes to the reports to be submitted under action A above.</p>	<p>Coordination units of both Ministries (MLGDRD, MOGCSP)</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Maintain the organizational structure that currently exists on the original project with qualified staff and resources to support management of E&S risks and impacts including an Environmental and Social Safeguards (ESS) Specialist.</p>	<p>Maintain the existing organizational structure throughout Project implementation.</p>	<p>MLGDRD</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>The MLGDRD ESS Specialist, Gender Officer and Environment and Social focal persons at the zonal level currently implementing the Ghana Productive Safety Net Project 2 (P175588) (Original Financing or GPSNP 2) will continue to provide E&S support for risk identification, management, and reporting for GPSNP 2 Additional Financing (GPSNP 2 AF).</p> <p>An ESS Specialist shall be recruited for the MLGDRD Coordinating Unit, given the existing ESS Specialist has resigned, to provide E&S implementation support to the Project. At the MoGCSP, a Gender Focal Person for the Project Coordinating Unit shall be appointed to support the implementation of the gender and SEA/SH prevention plan as it relates to their subprojects and will work with the MLGDRD Gender Focal Point on gender-related reporting for the project.</p> <p>The MLGDRD Coordinating Unit (MCO) formerly Rural Development Coordinating Unit (RDCU) and the Ghana School Feeding Program (GSFP) National Secretariat may also hire external expertise and consultancy services for specific E&S activities, where necessary. This structure shall be maintained throughout Project implementation.</p>	<p>The ESS Specialist at the MLGDRD and Gender Focal Person at the MoGCSP shall be appointed before the Effective Date.</p>	<p>MLGDRD/ MoGCSP</p>
<p>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>Update, adopt and implement the Environmental and Social Management Framework (ESMF) and adopt and implement the existing Resettlement Policy Framework (RPF) that were prepared for GPSNP 2, consistent with ESSs and in a manner acceptable to the Association. The ESMF includes Labor Management Procedures (LMP), and an Integrated Pest Management Plan (IPMP), and an Occupational Health and Safety (OHS) management plan.</p> <p>When required for the specific subproject, under the Labor-Intensive Public Works (LIPW) subprojects under Component 2 and/or the Ghana School Feeding Program (GSFP) activities under Component 3, prepare, disclose, consult upon, adopt and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP), as set out in the ESMF and consistent with the relevant ESSs.</p>	<ul style="list-style-type: none"> • The ESMF and RPF shall be implemented throughout the Project implementation. • ESIA/ ESMPs when required, shall be prepared, and submitted for the Association’s approval before launching the bidding process for the respective subprojects. Once approved, the ESIA/ ESMPs are carried out throughout Project implementation. • Occupational Health and Safety Management Plan shall be prepared and submitted for the Association’s approval before launching the procurement process for caterers. Once approved the OHS will be carried out throughout Project implementation. 	<p>MLGDRD/ MoGCSP</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms, and GSFP caterers. Thereafter ensure that the contractors and supervising firms and caterers comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	<ul style="list-style-type: none"> As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. 	MLGDRD/ MoGCSP
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	MLGDRD/ MoGCSP
1.5	<p>CONTINGENT EMERGENCY RESPONSE FINANCING</p> <p>a) Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements for the implementation of the CERC component in accordance with the ESSs.</p> <p>b) Adopt any environmental and social (E&S) instruments which may be required for activities under the CERC component (Component 6) of the Project, in accordance with the CERC Manual and the CERC ESMF that will be finalized before CERC activation, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.</p>	<p>a) The adoption of the CERC Manual and the CERC ESMF in form and substance acceptable to the Association is a withdrawal condition under Section III.B.1(b)(ii) of Schedule 2 of the Financing Agreement for the Project.</p> <p>b) Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation.</p>	
ESS 2: LABOR AND WORKING CONDITIONS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Update, redisclose, adopt and implement the Labor Management Procedures (LMP) developed for GPSNP2 as part of the ESMF, including, inter alia, provisions on working conditions, management of worker relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms as well as GSFP caterers.</p> <p>The LMP will be referenced in the ESHS specifications of the procurement documents with requirements for contractors and caterers to update into a Plan during implementation and comply with its requirements consistent with ESS2 (including, inter alia, the provisions of protective gear for cooks, timely payment of cooks, employment of minors, specification of work hours for the GSFP cooks).</p>	<p>Update, redisclose, adopt and implement the ESMF including the LMP to incorporate GSFP service providers not later than three months after effectiveness of GPSNP 2 AF and thereafter implement the LMP throughout Project implementation</p> <p>While the updates are being finalized, implement the original LMP prepared for the GPSNP 2.</p>	MLGDRD/ MoGCSP
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>The Recipient and contractor shall maintain and operate within the Project grievance mechanism for all categories of Project workers, as described in the LMP and consistent with ESS2.</p>	Operationalize the grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout project implementation.	MLGDRD/ MoGCSP
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Update, as applicable, adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes including food waste, consistent with ESS3.</p>	WMP will be adopted prior to commencement of activities for Component 2 (LIPW) and Component 3 (GSFP), and to be maintained throughout implementation.	MLGDRD/ MoGCSP
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Resource efficiency and pollution prevention and management measures identified in the ESMF or any subsequent tool to be occasioned by subprojects shall be complied with consistent with ESS3. Subproject-specific measures will be included in the ESMPs that will be prepared before commencement of any civil work. The Integrated Pest Management Plan (IPMP) annexed to the ESMF will be implemented by the Recipient as required.</p>	<ul style="list-style-type: none"> Update, as applicable and adopt the necessary plans (ESMPs, IPMP) and procedures (SOPs) prior to implementation of Labor -Intensive Public Works (LIPW) subprojects and Ghana School Feeding Programme (GSFP) s. Maintain throughout Project implementation 	MLGDRD/ MoGCSP

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Potential sources of food contamination (use of chemicals during storage and cleaning), hygienic state of storage facilities, handling and disposal of garbage, use of expired food ingredients), and smoke impacts on health will be mitigated by complying with all relevant standard operating procedures (SOPs).		
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY 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.	<ul style="list-style-type: none"> • Prior to implementation of LIPW activities. • Maintain throughout Project implementation 	MLGDRD/
4.2	COMMUNITY HEALTH AND SAFETY Prepare, adopt, and implement measures and actions 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 Association. The Project shall adopt and implement the stand-alone COVID-19 Response Plan prepared for the Original GPSNP 2 to assess and manage the risks of spread of COVID-19.	<ul style="list-style-type: none"> • Prior to commencement of civil works • Maintain throughout Project implementation. 	MLGDRD/ MoGCSP
4.3	SEA AND SH RISKS Implement the standalone SEA/SH Action Plan prepared for the project and integrate requirements as part of the ESMPs developed for relevant subprojects, to assess and manage the risks of SEA and SH, all consistent with ESS4.	Implement the SEA/SH Action Plan throughout Project implementation.	MLGDRD/ MoGCSP
4.4.	DAM SAFETY Assess the dam safety risks associated with the rehabilitation of small earth dams and dugouts under LIPW activities and prepare and implement an operational and maintenance plan including an emergency preparedness plan as part of the ESMP prior to commencing civil works, all consistent with ESS4.	Prior to commencement of civil works concerning the relevant LIPW activities	
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT POLICY FRAMEWORK Implement the existing Resettlement Policy Framework (RPF) developed for the Project, consistent with ESS5, and should be implemented throughout the project.	Utilize the RPF for the GPSNP 2 as part of GPSNP 2 AF, and implement the RPF throughout Project implementation	MLGDRD

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
5.2	<p>RESETTLEMENT PLANS</p> <p>The MLGDRD/ RDCU shall prepare, disclose, consult upon, adopt, and implement resettlement action plans (RAPs) in accordance with ESS 5 and consistent with the requirements of the RPF that has been prepared for the Project, in a manner acceptable to the Association.</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, including 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.	MLGDRD
5.3	<p>GRIEVANCE MECHANISM</p> <p>The grievance mechanism to address resettlement-related complaints are described in the RPF, RAPs and SEP. The existing GPSNP 2 GRM systems in place at the implementing agencies and the local level will be used throughout implementation.</p>	Utilize prior to commencement of resettlement activities and maintained throughout implementation	MLGDRD
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>The MLGDRD through the RDCU will avoid adverse impacts on biodiversity and habitats by screening the relevant subprojects for these impacts in accordance with the ESMF and excluding ineligible investments listed in the ESMF. Where avoidance of such impacts is not possible, the Recipient shall adopt and implement measures and actions for biodiversity impact mitigation as required in the ESMF and consistent with ESS6.</p>	Throughout Project Implementation	MLGDRD
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
Not relevant.			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS</p> <p>The MLGDRD shall adopt and implement the Chance Finds procedure described in the ESMF developed for the Project, consistent with ESS8.</p> <p>In the event of a find or the observation of a cultural practice, implement 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>	Implement the procedures throughout Project implementation.	MLGDRD
ESS 9: FINANCIAL INTERMEDIARIES			
Not relevant.			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Redisclose, adopt and thereafter implement the updated 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>	<p>Adopt the updated redisclosed SEP (disclosed April 12, 2023), and utilize for the AF implementation, and thereafter update as needed, and implement the SEP throughout Project implementation.</p>	<p>MLGRD/ MoGCSP</p>
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Publicize, maintain, and operate an accessible grievance mechanism (Single Window CE Service) that already exists on the parent project, to receive and facilitate resolution of concerns and grievances in relation to the parent Project and AF, 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 is 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>	<p>The GRM is already in place; Maintain and operate the mechanism throughout Project implementation.</p>	<p>MLGRD/ MoGCSP</p>
CAPACITY SUPPORT			
CS1	<p>Training will be required for new PIU staff and Project workers on:</p> <ul style="list-style-type: none"> • stakeholder mapping and engagement • specific aspects of environmental and social assessment • emergency preparedness and response • community health and safety. 	<p>Throughout project implementation</p>	<p>MLGRD/ MoGCSP</p>
CS2	<p>The MLGRD shall ensure that relevant project actors are trained in the following areas:</p> <ul style="list-style-type: none"> • The project's GRM • Stakeholder roles and engagement • E&S requirements (impacts and mitigation measures) of project activities • Subproject Environmental and Social screening • Occupational Health and Safety • Emergency preparedness and response • Training on COVID 19 transmission, prevention, preparedness, and response • SEA/SH Risk Mitigation • Disability inclusion training • Documentation and reporting 	<p>Target Groups and Timeframe for Delivery</p> <ul style="list-style-type: none"> • Training is required for all relevant project actors at the district (Caterers, Cooks, Desk officers and Community Development Officers, Works Engineers, Contractors, and their supervisors), and community levels (Facility Management Committee members) 	<p>MLGRD/ MoGCSP</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> • Training will be done before commencement of civil works, and annually thereafter throughout implementation, as needed 	