

Republic of Ghana

**The Ministry of Environment, Science,
Technology and Innovation (MESTI)**

**West Africa Coastal Areas Resilience Investment
Project II- P175525**

**Negotiated
ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

November 02, 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Ghana (The Recipient) will implement the West Africa Coastal Areas Resilience Investment Project II (the Project), through the Ministry of Environment, Science, Technology and Innovation (MESTI), as set out in the Financing Agreement. The International Development Association (The Association), has agreed to provide financing for the Project, as set out in the referred agreement(s).
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 and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Minister of Environment, Science, Technology and Innovation. 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), as relevant.</p> | Submit quarterly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than 10 working days after the end of each reporting period. | MESTI |
| 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. 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 no later than 24 for any severe incident/accident involving fatalities or SEA allegations.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association</p> | MESTI |
| C | <p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms 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> | Submit the monthly reports to the Association upon request as annexes to the reports to be submitted under action A above. | MESTI |
| ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS | | | |
| 1.1 | <p>ORGANIZATIONAL STRUCTURE</p> <p>Maintain a Project Implementation Unit (PIU) within MESTI with qualified staff and resources to support management of ESHS risks and impacts of the Project, including an environmental specialist and a social specialist. Ensure the environmental and social specialists in the PIU of the Greater Accra Resilience Integrated Development (GARID) Project are maintained to support Project implementation.</p> | <p>Maintain a PIU as set out in the Financing agreement throughout Project implementation.</p> <p>The Environment Specialist and Social Specialist are in place and will be maintained throughout Project implementation.</p> | MESTI Contractors |

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| | | Maintain the GARID PIU Environmental and Social Specialists that will support project implementation throughout Project implementation. | |
| 1.2 | <p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>Prepare, disclose, consult upon, adopt and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for activities under Component 3 of the Project, and consistent with the relevant ESSs.</p> <p>Disclose, consult upon, adopt and implement the Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p> <p>Require contractors, supervising consultants, and implementing agencies to adopt and implement the site-specific Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP), as set out in the ESMF.</p> | <p>Prepare, disclose, consult upon, and adopt the ESIA and ESMP prior to commencement of civil works, and thereafter implement the ESIA and ESMP throughout Project implementation.</p> <p>Project ESMF was prepared, consulted upon, and disclosed in the country on October 5, 2022, and will be implemented throughout Project implementation.</p> <p>Require contractors to adopt the contractor's ESIA and ESMP before launching the bidding process for the respective subproject activities that requires the adoption of such ESIA/ESMP. Once adopted, implement the respective ESIA/ESMP throughout Project implementation.</p> | MESTI Contractors |
| 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. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p> | <p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors throughout Project implementation.</p> | MESTI |
| 1.4 | <p>TECHNICAL ASSISTANCE</p> | Throughout Project Implementation | MESTI |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
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| | Ensure that the consultancies, studies (including feasibility studies, technical assistance on legislation and guidelines such as coastal management regulations/guidelines), 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. | | |
| ESS 2: LABOR AND WORKING CONDITIONS | | | |
| 2.1 | LABOR MANAGEMENT PROCEDURES Disclose, adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms. | LMP was prepared consulted upon, and disclosed in the country on October 5, 2022 and will be implemented throughout Project implementation. | MESTI |
| 2.2 | GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. | Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation. | MESTI |
| ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT | | | |
| 3.1 | WASTE MANAGEMENT PLAN Adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes, consistent with ESS3. | Adopt the WMP prior to commencement of civil works, and thereafter implement the WMP throughout Project implementation. | MESTI Contractors |
| 3.2 | RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.2 above. | Same timeframe as for the adoption and implementation of the ESMP | MESTI |
| ESS 4: COMMUNITY HEALTH AND SAFETY | | | |
| 4.1 | TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2 above. | Same timeframe as for the adoption and implementation of the ESMP. | MESTI |
| 4.2 | COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities including behavior of Project workers, risks of labor influx, COVID-19 spread, response to emergency situations, and communal conflict, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF. | Same timeframe as for the adoption and implementation of the ESMPs. | MESTI |

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| 4.3 | SEA AND SH RISKS Disclose, consult, adopt and implement a Gender and Gender Based Violence (GBV) Action Plan to assess and manage the risks of SEA and SH. | The Gender and GBV Action Plan was disclosed on October 5, 2022 and will be implemented throughout Project implementation. | MESTI |
| ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT | | | |
| 5.1 | RESETTLEMENT POLICY FRAMEWORK Disclose, consult upon, adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5. | RFP disclosed on October 5, 2022 and will be implemented throughout Project implementation. | MESTI |
| 5.2 | RESETTLEMENT PLANS Adopt and implement a resettlement action plan (RAP) [for each activity under the Project for which the RPF requires such RAP, and consistent with ESS5. | Prepare, disclose, consult upon, adopt and implement the respective RAP, 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. | MESTI |
| ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES | | | |
| 6.1 | BIODIVERSITY RISKS AND IMPACTS Adopt and implement a Biodiversity Management Plan (BMP) when needed in accordance with the guidelines of the ESMF/ ESIA prepared for the Project, and consistent with ESS6. | Adopt biodiversity management measured as part of the ESMF/ESIA. Where necessary, adopt a standalone BMP, prior to commencement of civil works and thereafter implement the BMP throughout Project implementation. | MESTI |
| ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES | | | |
| 7.1 | INDIGENOUS PEOPLES PLANNING FRAMEWORK This Standard is currently not relevant | | |
| ESS 8: CULTURAL HERITAGE | | | |
| 8.1 | CHANCE FINDS Adopt and implement a Cultural Heritage Management Plan, as part of the ESMF/ESIA of the Project. | Same timeline as of the preparation of the ESMF/ESIA. Implement the procedures throughout Project implementation. | MESTI |
| ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).] | | | |
| | This Standard is currently not relevant | | |
| ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE | | | |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
|-------------------------------|---|--|--------------------|
| 10.1 | <p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p> <p>Develop, adopt, and implement a communications strategy for the Project in line with the SEP.</p> | <p>SEP disclosed on October 5, 2022 and will be implemented throughout Project implementation.</p> <p>Develop the project communication strategy no later than 6 months after the Effective Date, and thereafter adopt and implement the strategy throughout Project implementation.</p> | MESTI |
| 10.2 | <p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p> | <p>Establish the grievance mechanism no later than 3 months after the Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation. Until the establishment of the grievance mechanism, project related complaints will be addressed through the existing grievance mechanism at the Environment Protection Agency under MESTI.</p> | MESTI |
| CAPACITY SUPPORT | | | |
| CS1 | <p>Training for PIU staff, stakeholders, communities, 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. • grievance redress and SEA/SH prevention • E&S monitoring reporting • ESF application | <p>From the first year from Effective Date and throughout project implementation.</p> | MESTI |
| CS2 | <p>Training for Project workers</p> <ul style="list-style-type: none"> • occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations. | <p>From the first year from Effective Date and throughout project implementation.</p> | MESTI |

