

The Republic of Ghana
Ministry of Food and Agriculture

Additional Financing for West African Food System
Resilience Program (FSRP) - P181488

Phase 2 Under the Multi-Phase Programmatic Approach

UPDATED
ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP) - Parent Project
and Additional Financing

April 5, 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Ghana (the Recipient) is implementing the West African Food System Resilience Program – Phase 2 under the Multiphase Programmatic Approach as well as the additional financing provided to the project (the Project), through the Ministry of Food and Agriculture (MoFA), as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide continued financing for the Project, as set out in the referred agreement(s). This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for the 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(s).
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 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 Chief Director of MoFA, and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient. 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><i>Submit quarterly reports to the Association throughout Project implementation, commencing after the Effective Date, as it is the case for the parent project. Submit each report to the Association no later than five (05) working days after the end of each reporting period.</i></p>	Project Implementation Unit (PIU)
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><i>Notify the Association no later than 48 hours after learning of the incident or accident.</i></p> <p><i>An incident report with root cause analysis and corrective actions shall be provided to the Bank within 30 days from the time of the incident.</i></p>	PIU
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 upon request.</p>	<p><i>Submit the monthly reports to the Association upon request throughout the Project’s implementation period starting from the Project effective date.</i></p>	PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a Project Implementation Unit (PIU) with qualified staff and resources to support management of ESHS risks and impacts of the Project including qualified environmental and social risk management staff (an Environmental Specialist, a Social Specialist, and a GBV Specialist, and ensure they have representation in the senior management to have overall accountability for the environmental and social performance.</p>	<p><i>The PIU set up under the parent project which includes one Environmental Specialist, and one Social Specialist shall be maintained throughout Project implementation.</i></p>	PIU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	<p><i>Recruit one GBV Specialist no later than three (3) months after the Effective Date of the additional financing of the Project, and thereafter maintain these positions throughout Project implementation.</i></p>	
<p>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. Screen subproject activities and specific sub-project locations once they are identified for the Project. Prepare, adopt, disclose, and implement necessary site-specific instruments such as an Environmental and Social Impact Assessment (ESIA), an Environmental and Social Management Plan (ESMP) etc., as needed, consistent with the relevant ESSs. For such site-specific instruments, submit relevant terms of reference (TORs) for the preparation of these instruments to the Association for review and clearance.</p> <p>2. Adopt and implement the Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p>	<p>1. <i>Submit relevant terms of reference (TORs) for site-specific instruments to the Association for review and clearance prior to commencement of the activity. Prepare, consult upon, submit for the Association’s clearance, and disclose the site-specific instruments such as the ESIA, ESMP etc. before commencement of the Project activities that require them. Adopt the instruments before launching the bidding process for the respective Project activity that requires the instrument(s). Once adopted, implement the respective instrument throughout Project implementation.</i></p> <p>2. <i>The ESMF was adopted on March 10, 2022, for the parent project and shall be implemented throughout Project implementation.</i></p>	<p>PIU</p>
<p>1.3 MANAGEMENT OF CONTRACTORS</p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Incorporate the relevant aspects of the ESCP, including, inter alia, the management tools and instruments referred to in Section 1.2 above, 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, including codes of conduct of their respective contracts.	<i>During the preparation of procurement documents and before the start of activities by contractors. Supervise the application of these measures throughout Project implementation.</i>	PIU
1.4	PERMITS, CONSENT AND AUTHORIZATION Secure relevant permits, consents, and authorizations applicable to the subproject activities from relevant national authorities and agencies. Comply or cause to comply, as appropriate, with the conditions established in these permits, consents, and authorizations throughout Project implementation.	<i>Obtain permits, consents, and authorizations before commencing relevant Project activities. Thereafter, implement and comply with permits, consents, and authorizations throughout Project implementation.</i>	PIU
1.5	TECHNICAL ASSISTANCE Ensure that the consultancies, studies (including feasibility 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	<i>Throughout Project Implementation</i>	PIU
1.6	CONTINGENT EMERGENCY RESPONSE FINANCING a) Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements including CERC-ESMF that will be included or referred to in the CERC Manual for the implementation of the CERC Part, in accordance with the ESSs. b) Adopt any environmental and social (E&S) instruments which may be required for activities under the CERC Part of the Project, in accordance with the CERC Manual and, CERC-ESMF or and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.	<i>a) The adoption of the CERC Manual in form and substance acceptable to the Association is a withdrawal condition under Section III.B. of Schedule 2 of the Financing Agreement for the Project. b) Submit the respective E&S instrument for the Association’s prior review and approval and include it as part of the respective bidding process, 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.</i>	PIU
ESS 2: LABOR AND WORKING CONDITIONS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement the Labor Management Procedures (LMP) prepared for the parent 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.</p>	<p><i>The LMP was adopted on March 10, 2022, and shall be implemented throughout Project implementation.</i></p>	PIU
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Continue operationalizing the grievance mechanisms established for Project workers under the parent project and establish and operationalize new grievance mechanisms for Project workers, as described in the LMP and consistent with ESS2.</p>	<p><i>Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.</i></p>	PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Adopt and implement a Waste Management Plan (WMP) either as a standalone plan or as part of the ESMP, to manage hazardous and non-hazardous wastes, consistent with ESS3.</p> <p>Prepare, adopt, disclose, and implement an electronic and electrical equipment waste (e-waste) management plan, consistent with ESS3.</p>	<p><i>Adopt the WMP prior to commencement of waste generation activities, and thereafter implement the WMP throughout Project implementation.</i></p> <p><i>Prepare the e-waste management plan by the mid-term of project implementation.</i></p>	PIU
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.2 above.</p> <p>Ensure that pest management follows the integrated approaches identified in the Integrated Pest Management Plan (IPMP) for the parent project and that pesticides used are manufactured, formulated, packaged, labeled, handled, stored, and disposed of, in accordance with good international industrial practices as well as the World Bank Group’s Environmental Health and Safety Guidelines (EHSGs).</p>	<p><i>Same timeframe as for the adoption and implementation of the ESMP</i></p> <p><i>The IPMP was disclosed on March 10, 2022, for the parent project and will be implemented throughout Project implementation.</i></p>	PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action [1.2] above.</p>	<p><i>Same timeframe as for the adoption and implementation of the ESMP.</i></p>	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Require contractors and subcontractors to incorporate measures to manage traffic and road safety risks in their C-ESMPs.	<i>C-ESMPs shall be prepared and approved by the PIU before commencement of the related Project activity and thereafter implemented throughout the Project activity.</i>	
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, response to emergency situations, SEA/SH, COVID-19 and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.	<i>Same timeframe as for the adoption and implementation of the ESMPs.</i>	PIU
4.3	SEA AND SH RISKS Adopt and implement a SEA/SH Prevention and Response Action Plan as part of the ESMP, to assess and manage the risks of SEA and SH.	<i>The SEA/SH Action Plan was adopted as part of the ESMF on March 10, 2022, and shall be implemented throughout Project implementation.</i>	PIU
4.4	SECURITY MANAGEMENT The use of security personnel is not envisioned in the project, but should this aspect change, assess and prepare a Security Management Plan and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, as set out in the Security Management Plan, guided by the principles of proportionality and Good International Industrial Practices (GIIP), and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.	<i>Prior to engaging security personnel and thereafter implemented throughout Project implementation.</i>	PIU
4.5	DAM SAFETY (FOR ANNEX A, PARA. 2. ESS4) 1. For the Kpong Irrigation Scheme (KIS), submit to the Association a recent Dam Safety Assessment (DSA) on the Kpong dam, under terms of reference, and in form and substance satisfactory to the Association. a. For all other irrigation schemes relying on existing dam/reservoir which shall be identified during Project implementation, engage experienced and competent professionals to, inter alia: (a) inspect and evaluate the safety status of the respective dam, its appurtenances, and its performance history; (b) review and evaluate the owner's operation and maintenance procedures; and (c) provide a written report of findings and recommendations for any remedial work or safety related measures necessary to upgrade the dam to an acceptable standard of safety.	<i>Submit TORs for the Association's review and clearance before commencement of bidding processes.</i> <i>Submit DSAs to the Association for review and clearance before commencement of civil works on the affected irrigation schemes.</i>	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>2. Engage experienced and competent professionals for the supervision of the design and rehabilitation of each relevant dam and adopt and implement dam safety measures during the design, bid tendering, rehabilitation, operation, and maintenance of each relevant dam and associated works.</p> <p>3. Adopt and implement the following Dam Safety Plans for each relevant dam under the Project: (i) a plan for rehabilitation/construction supervision and quality assurance; (ii) an instrumentation plan; (iii) an operation and maintenance plan; and (iv) an emergency preparedness plan.</p> <p>5. Carry out a safety inspection of each relevant dam at intervals of not less than once every year during Project implementation, by independent experts whose terms of reference shall be acceptable to the Association.</p>		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT POLICY FRAMEWORK Adopt and implement the Resettlement Policy Framework (RPF) prepared for the parent project, consistent with ESS5.</p>	<i>The RPF was adopted on March 10, 2022, and shall be implemented throughout Project implementation.</i>	PIU
5.2	<p>RESETTLEMENT PLANS Adopt and implement a resettlement action plan (RAP) for each activity under the Project for which the RPF requires such RAP, as set out in the RPF, and consistent with ESS5.</p>	<i>Adopt and implement the respective RAP, including ensuring that before taking possession of land and related assets, full compensation has been provided and as applicable displaced people have been resettled and moving allowances have been provided.</i>	PIU
5.3	<p>GRIEVANCE MECHANISM Continue implementing the Grievance Mechanism as described in the SEP and referred to in action 10.1 below for resolution of grievances related to land acquisition and involuntary resettlement.</p>	<i>Throughout project implementation.</i>	PIU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Adopt and implement biodiversity management measures as part of the ESIsAs and ESMPs to be subsequently developed consistent with ESS6.</p>	<p><i>Adopt biodiversity management measures in the same timeframe as for the adoption and implementation of the ESIsAs and ESMPs, and thereafter implement the measures throughout Project implementation.</i></p>	PIU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	This ESS is not relevant in Ghana.		
ESS 8: CULTURAL HERITAGE			
8.1	Describe the chance finds procedures as part of the ESIsAs and ESMPs, and in specific sites prepare a cultural heritage management plan, as part of ESMPs, if required.	<p><i>Describe the chance find procedures in the ESIsAs and ESMPs. Implement the procedures throughout Project implementation. Adopt Cultural Heritage Management Plans with the same timelines as the ESMP in 1.2 above.</i></p>	PIU
ESS 9: FINANCIAL INTERMEDIARIES			
	This standard is not relevant to this Project.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Develop and Annex to the Stakeholder Engagement Plan (SEP) prepared for the parent project, consistent with ESS10, which includes measures to, inter alia, provide stakeholders and tomatoes value chain actors in the northern zone covering the AF 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><i>The SEP for the parent project was adopted on May 4, 2022. Develop and Annex to the SEP within 3 months after the Effective Date of the additional financing, and thereafter implement it throughout Project implementation.</i></p>	PIU
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Continue operationalizing the grievance mechanism described in the SEP, 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><i>Operate the grievance mechanism throughout Project implementation.</i></p>	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	The grievance mechanism shall 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.		
CAPACITY SUPPORT			
CS1	<p>Continue training Implementing Partners (IPs), contractors, consultants and workers on the following which could be expanded as required:</p> <ul style="list-style-type: none"> • Stakeholder mapping and engagement • Environmental and social screening • Environmental and social management • Emergency preparedness and response • Community health and safety (including traffic and road safety, mitigation measures related to communicable diseases) • Vector/Pest risk management using IPM approach • SEA/SH risk management • Occupational health and safety • Training on the gender inclusion action plan • Identifying and addressing risks to vulnerable groups and individuals 	<i>Throughout Project Implementation</i>	PIU
CS2	<p>Continuously train PIU staff and project workers on (not restricted to):</p> <ul style="list-style-type: none"> • Occupational health and safety (including COVID-19 mitigation measures) • Emergency prevention and preparedness and response – e.g., fire fighting • Introduction to World Bank ESF • Introduction to environmental and social assessment (and targeting and tailoring effective baselines and mitigation measures) 	<i>Throughout Project Implementation</i>	PIU