

The Republic of Ghana



Ministry of Health

GHANA COVID-19 EMERGENCY PREPAREDNESS AND RESPONSE PROJECT ADDITIONAL FINANCING (P174839)

Draft

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

OCTOBER 19, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Ghana *is implementing* the GHANA COVID-19 Emergency Preparedness and Response Project (the **Project**), and Additional Financing Project with the involvement of the Ministry of Health and the Ghana Health Service (GHS). The *International Development Association (hereinafter the Association)* has agreed to provide financing for the Project.
2. The Republic of Ghana will 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 Republic of Ghana will also comply with the provisions of any other E&S documents required under the 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 Republic 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 will be monitored and reported to the *Association* by the Republic of Ghana as required by the ESCP and the conditions of the legal agreement, and the *Association* will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the *Association* and the Republic 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 Republic of Ghana will agree to the changes with the *Association* and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the *Association* and the Republic of Ghana. The Republic of Ghana will 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 Republic of Ghana shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include *environmental, health, and safety impacts, medical waste management and community health and safety impacts labor influx, sexual exploitation and abuse and sexual harassment*.

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAAME | RESPONSIBLE ENTITY/AUTHORITY |
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| MONITORING AND REPORTING | | | |
| A | <p>REGULAR REPORTING</p> <p>The Ministry of Health (MOH) will prepare and submit to the World Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project. The report will, among others, include (i) status of implementation of the ESCP; (ii) conditions, if any, which interfere or threaten to interfere with the implementation of the ESCP; and (iii) corrective and preventive measures taken or required to be taken to address such conditions (iv) stakeholder engagement activities and functioning of the grievance mechanism.</p> | Quarterly throughout the Project implementation period. | Ministry of Health, Ghana/ Ghana Health Service |
| B | <p>INCIDENTS AND ACCIDENTS</p> <p>Contractors, through the MOH, will promptly notify the Bank of any incident or accident related or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including situations of fatalities or serious bodily harm and incidents such as fire injuries, physical violence, Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), construction accident, communicable diseases and infections etc. The report will include full detail of the incident or accident, indicating immediate measures taken to address it, and include information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p> | Submission to the Bank should take place within 48 hours and no later than 72 hours after learning of the incident or accident. | Overall responsibility will be with the Ministry of Health, Ghana/ Ghana Health Service |
| C | <p>CONTRACTORS MONTHLY REPORTS</p> <p>Contractors shall provide monthly monitoring reports, including procurement report to the MOH.</p> | The reports shall be submitted to the MOH, and to the Bank upon request | Ministry of Health and Ghana Health Service E&S Specialists |
| ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS | | | |

| MATERIAL MEASURES AND ACTIONS | TIMEFRAME | RESPONSIBLE ENTITY/AUTHORITY |
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| <p>1.1 ORGANIZATIONAL STRUCTURE</p> <p>The Ministry of Health/ GHS shall maintain a PIU with qualified staff resources to support management of environmental and social risks and impacts of the Project including environmental and social risk. The Ministry of Health/GHS has appointed an Environmental and Social Officer at the national level. With the expanded project scope, additional qualified environmental and social safeguards officers will be assigned, as necessary, to supplement the existing staff in the implementation of the social and environment standards under this Project.</p> | <p>The Ministry of Health has already appointed an Environmental and Social Officer at the national level.</p> <p>This will be replicated at the regional and district level as necessary</p> | <p>Ministry of Health, Ghana/ Ghana Health Service</p> |
| <p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Subprojects will be screened for Environmental and Social risks and impacts as per the procedures outlined in the ESMF, in a manner acceptable to the Bank. Based on the screening results, detailed environmental and social assessments may be conducted and accompanied by the relevant ESMFs to address any risks identified during the process. All ESIA will be comprehensive to include assessment of waste management and pollution, Labor, SEA/SH risk assessment, social diversity and gender, impacts on vulnerable and disadvantaged groups or individuals, etc., and preparation of a draft ESMP, Labor Management Procedure and SEA/SH Action Plan.</p> | <p>Throughout project implementation</p> | <p>Ministry of Health, Ghana/ Ghana Health Service</p> |

| MATERIAL MEASURES AND ACTIONS | TIMEFRRAME | RESPONSIBLE ENTITY/AUTHORITY |
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| <p>1.3 MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>a. The project has updated the stakeholder engagement plan (SEP) for the parent project. The Environmental and Social Management Framework (ESMF) for the parent project will be updated, cleared by the World Bank and disclosed prior to project effectiveness. The ESMF includes Screening Forms to be used to screen all sub-project to determine requirement for follow up ESIA, ESMFs, RAPs etc.</p> <p>b. If during implementation there is need for any construction activities where private land is acquired or purchased, the project will prepare Resettlement Framework and Resettlement Action Plans and Abbreviated Resettlement Action Plans as may be required.</p> <p>c. Secure environmental permits for all new construction and rehabilitation under the Project.</p> <p>d. Prepare, disclose, adopt, and implement an ESIA/ESMP and/or any other instruments, if required for the respective subproject activities based on the assessment process, in accordance with the ESSs, the ESMF, the EHSsGs, and other relevant Good International Industry Practice (GIIP) including the relevant part of COVID-19 Quarantine Guidelines and WHO COVID-19 biosafety guidelines in a manner acceptable to the World Bank.</p> <p>e. Incorporate the relevant aspects of this ESCP, including, inter alia, any environmental and social management plans or other instruments, ESS2 requirements, and any other required ESHS measures, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply with the ESHS specifications of their respective contracts.</p> | <p>a. The ESMF and the updated SEP will be approved by the World Bank prior to project effectiveness.</p> <p>b. Throughout project implementation.</p> <p>c. Throughout project implementation.</p> <p>d. Throughout project implementation.</p> <p>e. Throughout project implementation.</p> | <p>Ministry of Health, Ghana/ Ghana Health Service/PIU E&S Specialists</p> |

| MATERIAL MEASURES AND ACTIONS | TIMEFRAME | RESPONSIBLE ENTITY/AUTHORITY |
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| <p>1.4 MANAGEMENT OF CONTRACTORS</p> <p>The MOH/GHS shall manage contractors and subcontractors through inclusion of ESHS specification into procurement documents and contracts and thereafter, supervise compliance. These shall include but not limited to:</p> <ul style="list-style-type: none"> • Incorporating the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the Labor Management Procedures, into the ESHS specifications of the procurement documents for contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts. • Codes of conduct are required of contractors and subcontractors and their workers to prohibit sexual harassment and exploitation and training of workers on their obligations under the Code of conduct • Ensure contractor ESMP (C-ESMP) is costed, with sufficient budget to mitigate E&S risks • Monitor Contractor commitment and compliance • Ensure contractors provide details on contractor’s oversight on environmental, social, health and safety (ESH) performance • Contractor to develop a grievance redress mechanism to handle concerns of their employees. | <p>Prior to issuing of procurement documents</p> <p>Supervise contractors throughout Project implementation</p> | <p>Ministry of Health, Ghana/ Ghana Health Service</p> |

| MATERIAL MEASURES AND ACTIONS | TIMEFRAME | RESPONSIBLE ENTITY/AUTHORITY |
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| <p>1.5</p> <p>EXCLUSIONS: Exclude the following type of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> • Activities that may cause long term, permanent and/or irreversible (e.g. loss of major natural habitat) adverse impacts • Activities that may have significant adverse social impacts and may give rise to significant social conflict • Activities that may have adverse impacts on cultural heritage | | |
| <p>1.6</p> <p>MONITORING AND REPORTING :</p> <p>The MoH/GHS PIU shall monitor the implementation of environment and social instruments to address environmental and social risks and impacts of the Project.</p> | <p>Part of the project progress reporting requirement</p> | <p>Ministry of Health, Ghana/ Ghana Health Service /PIU E&S Specialists</p> |
| <p>ESS 2: LABOR AND WORKING CONDITIONS</p> | | |

| MATERIAL MEASURES AND ACTIONS | TIMEFRAAME | RESPONSIBLE ENTITY/AUTHORITY |
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| <p>2.1 LABOR MANAGEMENT PROCEDURES</p> <p>Labor Management Procedures (LMP) will be elaborated in the ESMF, disclosed, adopted, and implemented consistent with ESS 2.</p> <p>The LMP shall set out the way in which project workers will be managed, in accordance with the requirements of Ghana national laws and ESS 2. The LMP will address the way in which ESS2 will apply to different categories of project workers including, inter alia, implementing adequate occupational health and safety, setting out grievance arrangements for project workers and requirements for third parties to manage their workers. The LMP will be referenced in the ESHS specifications of the procurement documents with requirements for contractors to update into a Plan during implementation and comply with its requirement.</p> | <p>Labor Management Plan will be part of specific ESMF/ESIA that will be prepared and submitted to the World Bank for approval.</p> <p>Prior to the preparation of procurement documents.</p> <p>These procedures must be maintained throughout Project implementation.</p> | <p>Ministry of Health, Ghana/ Ghana Health Service</p> |
| <p>2.2 GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>The contractor shall establish, maintain, and operate a GRM for staff, as described in the LMP and consistent with ESS2. This shall be approved by the PIU and the Bank.</p> | <p>Grievance mechanism operational prior to recruitment of workers and implemented throughout Project implementation.</p> | <p>Ministry of Health, Ghana/ Ghana Health Service/PIU E&S Specialists</p> |

| MATERIAL MEASURES AND ACTIONS | TIMEFRAME | RESPONSIBLE ENTITY/AUTHORITY |
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| <p>2.3 OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>MOH shall prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESMF already mentioned above. Contractors working on the Project shall abide by the approved occupational, health and safety (OHS) plan/measures. The OHS plan shall include guidelines provided in WHO country and technical guidance – coronavirus disease (COVID-19) documents for the prevention of the transmission of the COVID 19 infection. The contractor shall conduct their activities in observance of Government directive and policy on COVID 19.</p> <p>Contractor’s Health and safety officer and MOH E&S officer shall train/orient employees of Project Contractors on various aspects of OHS relevant to the project.</p> | <p>Prior to initiating construction/refurbishment activities and implemented throughout the Project life. It must follow the same timeframe as for the implementation of the ESMF</p> | <p>Ministry of Health, Ghana/ Ghana Health Service</p> |
| <p>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> | | |
| <p>3.1 RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Relevant aspects of this standard shall be considered, as needed, under action 1.3 above, including, inter alia, measures to: manage health care wastes, and other types of hazardous and non-hazardous wastes. Use of resources (water, air, etc.) should follow relevant WHO environmental infections control guidelines standards for medical facilities.</p> <p>Each beneficiary medical facility/lab will implement the National Health Care Waste Management Policy and a National Guideline for Health Care Waste Management, the ESMF, WHO COVID-19 guidance documents, and other best international practices, to prevent or minimize such adverse impacts.</p> | <p>Throughout Project implementation.</p> | <p>Ministry of Health, Ghana/ Ghana Health Service</p> |

ESS 4: COMMUNITY HEALTH AND SAFETY

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| 4.1 | <p>TRAFFIC AND ROAD SAFETY:</p> <p>Project Contractors shall be required to develop and implement measures and actions in the sub project ESMFs to assess and manage traffic and road safety risks as required in the ESMFs to be developed under action 1.3 above.</p> | Throughout Project implementation. | Ministry of Health, Ghana/ Ghana Health Service/PIU E&S Specialists |
| 4.2 | <p>COMMUNITY HEALTH AND SAFETY:</p> <p>The Project ESMF and ESMF shall guide the contractors to develop and implement adequate measures and actions to assess and manage specific risks and impacts to the community and beneficiary arising from project activities. These will include, inter alia, measures to: minimize the potential for community exposure to the COVID-19 disease, accidents and pollution; ill-behavior of project workers, risks of labor influx, response to emergency situations in case of laboratory accidents/emergencies, e.g, a fire response or natural phenomena event, prevent and respond to sexual exploitation and abuse, and sexual harassment; and protection of individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, have access to the development benefits resulting from the Project.</p> <p>Contractors measures, and work methods shall be validated by the local authorities and approved by the PIU.</p> | Maintained throughout Project implementation. | Ministry of Health, Ghana/ Ghana Health Service /PIU E&S Specialists |
| 4.3 | <p>GBV AND SEA RISKS:</p> <p>The Project will ensure the avoidance of any form of Sexual Exploitation and Abuse and Sexual Harassment by relying on the Health Professions Regulatory Bodies Act, 2013 (Act 857) and WHO Code of Ethics and Professional conduct for all workers in the quarantine facilities as well as the provision of gender-sensitive infrastructure such as segregated toilets and adequate lighting in quarantine and isolation centers.</p> | Maintained throughout Project implementation. | Ministry of Health, Ghana/ Ghana Health Service |

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| 4.4 | <p>GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION: SEA/SH prevention plan will be required by the contractor as part of C-ESMP with adequate funding for implementation.</p> <p>The contractor shall ensure workers strictly abide by the measures and workers code of conduct</p> | Throughout project implementation | Ministry of Health, Ghana/ Ghana Health Service |
| 4.4 | <p>SECURITY PERSONNEL: The project does not envisage the use of security personnel.</p> | Throughout Project implementation. | Ministry of Health, Ghana/ Ghana Health Service |
| ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT | | | |
| 5.1 | <p>RESETTLEMENT PLANS: No land acquisition is envisaged under this project since works will be conducted within existing government health facilities. The government will conduct screening at these facilities using the environment and social screening tool in the ESMF to ensure that the proposed facilities do not have encumbrances. In case permanent land acquisition would be necessary during implementation, a Resettlement Framework and Resettlement Action Plans or Abbreviated Resettlement Action Plans would be developed based on Bank's ESF principles prior to commencement of any land acquisition. Relevant aspects of this standard shall be considered, as needed, under action 1.3 above.</p> | RPF and RAPs submitted for the Bank's approval and, once approved, implemented prior to commencing civil work activities that involve land acquisition and resettlement. | Ministry of Health, Ghana/ Ghana Health Service |
| 5.2 | <p>GRIEVANCE MECHANISM The grievance mechanism (GM) to address resettlement related complaints shall be described in the RPF and RAPs and will be completed before commencement of civil works. The GRM will incorporate existing GRM systems in place at the MoH/GHS and the local level.</p> | Prior to commencement of resettlement activities and maintained throughout implementation | Ministry of Health/ Ghana Health Service |
| 5.3 | <p>MONITORING AND REPORTING: MoH/GHS shall ensure that monitoring and reporting on land acquisition and resettlement activities are conducted throughout the project as part of project regular reporting channels and separately as requested by the World Bank.</p> | Part of the project progress reporting requirement | Ministry of Health, Ghana/ Ghana Health Service /PIU E&S Specialists |

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| ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES | | |
| 6.1 | Not relevant. Minor construction or rehabilitation activities may be anticipated in this project and all works will be conducted within existing facilities. Hence, impacts of the project on natural resources and biodiversity are considered unlikely | Not relevant |
| ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES | | |
| 7.1 | Not relevant. There are no distinct social and cultural groups in the project area who exhibit characteristics akin to the criteria for indigenous or traditionally under-served communities as spelled out in the ESS7. | Not relevant |
| ESS 8: CULTURAL HERITAGE | | |
| 8.1 | CHANCE FINDS: Relevant aspects of this standard shall be considered, as needed, under action 1.2 above. A Chance Find procedure will be part of the ESMF. | Throughout project implementation |
| ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs). See below a couple of examples of actions that should be considered when FIs are involved.] | | |
| 9.1 | Not relevant. No financial intermediaries will be used | Not relevant |
| ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE | | |
| 10.1 | STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Update, disclose and adopt a Stakeholder Engagement Plan (SEP) consistent with ESS10, in a manner acceptable to the Association. The updated version of the SEP will include a risk communication and community engagement strategy, to be finalized under the Project in line with WHO guidance on “Risk communication and community engagement (RCCE) readiness and response to the 2019 novel coronavirus (2019-nCoV)” and in a manner consistent with ESS10 and acceptable to the Association. | The SEP for the parent project has been updated and will be submitted to the World Bank for approval and subsequently disclosed. |
| | | Ministry of Health/ Ghana Health Service |

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| 10.2 | PROJECT GRIEVANCE MECHANISM: Accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Association. | Throughout project implementation | Ministry of Health, Ghana/ Ghana Health Service |
| 10.3 | CITIZENS SURVEY Conduct periodic citizen’s survey will be conducted to assess satisfaction of the COVID-19 response by stakeholders and the general public. | Throughout project implementation | Ministry of Health, Ghana/ Ghana Health Service |
| 10.4 | The MOH/GHS will adhere to the requirements of the Ghana Data Protection Act 2012 (Act 843) to safeguard the legitimate, appropriate and proportionate use and processing of potential large volumes of personal identifiable and sensitive data likely to be collected and used in connection with the management of COVID-19 pandemic and subsequent vaccination programs | Throughout project implementation | Ministry of Health, Ghana/ Ghana Health Service |
| CAPACITY SUPPORT (TRAINING) | | | |

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| CS1 | <p>Training of personnel involved in project implementation will include among others:</p> <ul style="list-style-type: none"> • Overview of the relevant standards under the ESF (as per the Project ESRS) • COVID-19 Infection Prevention and Control Recommendations • Risk communication and community engagement • Grievance redress mechanisms • WHO guidelines • Laboratory biosafety guidance related to the COVID-19 • Specimen collection and shipment • Standard precautions for COVID-19 patients • Subproject Environmental and Social screening • Emergency preparedness and response • Occupational Health and Safety • Training on COVID 19 transmission, prevention, preparedness and response • Community health and safety • Monitoring and Reporting • SEA/SH Risk prevention and mitigation • Disability inclusion training • Waste management (healthcare waste- solid and sewage) • Documentation and reporting • Labor management procedures • WHO and Africa CDC guidelines on quarantine including case management | National and District Health Officers, Environmental Officers, Project Consultants. | Ministry of Health, Ghana/ Ghana Health Service |
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THE WORLD BANK - ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP):

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| CS2 | <p>Training for Project workers and community on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.</p> <ul style="list-style-type: none"> ● community health and safety. ● Occupational Health and Safety ● communicable diseases/HIV-AIDS/STI awareness and prevention ● community grievance redress mechanism as described in the Stakeholder Engagement Plan/ ESMF ● process for resolving conflicts between workers and community members ● SEA/ SH and Child protection. | Project contractors, workers and community | Ministry of Health, Ghana/ Ghana Health Service |
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