

THE REPUBLIC OF GHANA



MINISTRY OF HEALTH

**GHANA COVID-19 EMERGENCY PREPAREDNESS AND RESPONSE PROJECT THIRD ADDITIONAL
FINANCING (P178054)**

DRAFT

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

MARCH 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Ghana is *implementing* the Ghana COVID-19 Emergency Preparedness and Response (the **Project**), and Additional Financing 1 & 2. The Government is planning a Third Additional Financing (AF3) to provide additional upfront financing for safe and effective vaccine acquisition and equitable deployment in Ghana. The project will be implemented by the Ministry of Health (MOH) and the Ghana Health Service (GHS). The International Bank for Reconstruction and Development (IBRD) and International Development Association (IDA) hereinafter the World Bank has agreed to provide financing for the Project.
2. The Government of Ghana through GHS and MOH shall carry out the Project in accordance with the Environmental and Social Standards (**ESSs**). To this end, this Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions to be carried out or caused to be carried out by the Government of Ghana, including the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, grievance management and the environmental and social assessments and instruments to be prepared or updated, disclosed, consulted, adopted and implemented under the ESCP and the ESSs, all in a manner acceptable to the World Bank.
3. Implementation of the material measures and actions set out in this ESCP, ESMF and SEP shall be monitored and reported to the **World Bank** by the Government of Ghana through GHS and MOH as required by the ESCP and the provisions of the Financing Agreement.
4. As agreed by the World Bank and the 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 GHS and MOH shall update the ESCP to reflect the agreed-upon changes. Agreement on changes to the ESCP shall be documented through an exchange of letters signed between the World Bank and the Government of Ghana. The Government of Ghana through GHS and MOH shall promptly disclose the updated ESCP.
5. 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 *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		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	REGULAR REPORTING: Prepare and submit to the World Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to, stakeholder engagement activities and grievances log and National Communication Strategy for COVID-19 Vaccine Introduction.	Starting from the Effective Date, quarterly, six-monthly, annual reports shall be submitted no later than 10 days after the end of each reporting period, throughout Project implementation.	Project Implementation Unit (PIU) under the Ministry of Health
B	INCIDENTS AND ACCIDENTS: Promptly notify the World Bank 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, 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, any COVID outbreak, communicable diseases and infections in the Project area related to the project. Provide sufficient details 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 [Bank/Association]'s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.	<i>Notify the Bank within 48 and not later than 72hours after the PIU has become aware of the incident or accident. Upon request from the Bank, a report that details root causes and corrective actions will be provided within a timeframe acceptable to the Bank</i>	PIU under the Ministry of Health
C	CONTRACTORS MONTHLY REPORTS Contractors shall provide monthly monitoring reports, including procurement report to the MOH.	The reports shall be submitted to the MOH on monthly basis, and to the Bank upon request	Ministry of Health and Ghana Health Service E&S Specialists
ESS I: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
I.1	ORGANIZATIONAL STRUCTURE: The Ministry of Health and Ghana Health Service have established a Project Implementation Unit (PIU) under the parent project and appointed one focal person for environmental and one focal person for social risk management and Stakeholder Consultations. The focal points have the expertise and are responsible for managing E&S issues. The MOH and GHS shall maintain the Project Implementation Unit (PCU) with qualified staff and resources and enhance institutional coordination to support management of ESHS risks and impacts of the Project.	The PIU shall be maintained throughout Project implementation	Ministry of Health

<p>1.2</p>	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</p> <p>a. The Ministry of Health has prepared the ESMF for the Vaccine Additional Financing (AF2) and the ESMF for the Additional Financing One (AF1) and the parent project which were approved by the World Bank and disclosed on June 30, 2021 and November 10, 2020 respectively. Both the ESMFs for the Parent Project and AF1&2 remains relevant for the AF3. The ESMFs provide the framework to assess the environmental and social risks and impacts of the proposed subproject of the AF3 activities, in accordance with the ESSs, the Environmental, Health and Safety Guidelines (EHSGs), and other relevant Good International Industry Practice (GIIP), including relevant WHO guidelines.</p> <p>b. Prepare, disclose, consult, adopt and implement any environmental and social instrument (e.g., ESIA & ESMP) as may be required for the respective subproject activities of AF3 in accordance with the ESSs, the ESMF, SEP, the EHSGs, and other relevant Good International Industry Practice (GIIP), including relevant WHO guidelines to, inter alia, ensure access to and allocation of Project benefits in a fair, equitable and inclusive manner, taking into account the needs of individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, including, undocumented migrants.</p> <p>c. At this stage of the scope of the refurbishment or new construction of Children’s Emergency and Infectious Diseases Hospital in Accra and three health facilities in newly divided administrative regions under this AF3 is undetermined and were not part of the parent project. The MOH will use the screening tool in the ESMF to screen all sites proposed for construction and rehabilitation activities and determine the appropriate instruments to be prepared.</p> <p>d. Incorporate the relevant aspects of this ESCP, including, inter alia, the ESMF and ESMPs, into the ESHS specifications of the bidding 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>e. Adopt procedures, protocols and/or other measures to ensure the Project does not include forced vaccination as set out in the ESMF.</p>	<p>a. The ESMFs remain relevant. Screening shall be conducted before carrying out relevant subproject activities.</p> <p>b. Plans/instruments shall be prepared, disclosed, consulted and adopted before carrying out the relevant subproject activities, and thereafter implemented throughout implementation.</p> <p>c. Prepare the relevant E&S instruments prior to the disbursement funds for the new construction.</p> <p>d. The relevant ESHS measures shall be incorporated into the bidding documents before launching the procurement process for the relevant subproject activities and shall thereafter comply with throughout the carrying out of such activities.</p>	<p>PIU under the Ministry of Health</p>
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		e. throughout project implementation.	
1.3	<p>EXCLUSIONS: Exclude the following types of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> Biosafety Level 3 (BSL3) activities will be excluded unless the appropriate OHS capacity and infrastructure are in place. All the other excluded activities mentioned in the ESMF of the Project. 	During the assessment process conducted under action 1.2.a. above.	PIU under the Ministry of Health
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT: The Project shall be carried out in accordance with the Labour Management Procedures outlined in the ESMF as required by ESS2 including through, inter alia, implementing adequate occupational health and safety measures (including personal protective equipment, and emergency preparedness and response measures), setting out a grievance mechanism (GM) for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</p> <p>The planned mandatory vaccination announced by the government for a defined group of people (e.g., health workers and security agencies) has been suspended. If mandatory vaccination is introduced during implementation, regulations will be integrated into the National COVID-19 Vaccination Plan including any provisions for exceptions, due process, grievance redress and restrictive measures, such as measures that may interfere with labor and working standards described in ESS Labor and Working Conditions (ESS2).</p>	Throughout Project implementation.	PIU under the Ministry of Health, Ghana Health Service
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, measures to: carry out the purchase, storage, transportation and handling of vaccines (including, ultra-cold chain management) in a safe manner and in accordance with the EHSs, and other relevant GIIP including relevant WHO guidelines; and Healthcare Waste Management Plan to adequately manage and dispose of health care wastes (including, vaccines) and other types of hazardous and non-hazardous wastes.	Throughout Project implementation.	PIU under the Ministry of Health, Ghana Health Service
ESS 4: COMMUNITY HEALTH AND SAFETY			

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4.1	<p>COMMUNITY HEALTH AND SAFETY: Relevant aspects of this standard shall be considered, as needed, under action 1.2 above including, inter alia, measures to: minimize the potential for community exposure to communicable diseases; establish and implement appropriate quality management systems to manage the risks and the impacts that services provided and activities carried out under the Project may have on community health and safety; manage the risks of the use of security personnel; manage the risks of labor influx; and prevent and respond to sexual exploitation and abuse, and sexual harassment.</p>	Throughout Project implementation.	PIU under the Ministry of Health, Ghana Health Service

<p>4.2</p>	<p>USE OF MILITARY OR SECURITY PERSONNEL: The project is not likely to employ security forces in any aspects of the vaccine deployment. However, if it becomes necessary, the project will assess and establish their terms of engagement with the community and vaccination centers.</p> <p>The following measures shall be adopted to ensure that the engagement of security or military personnel for provision of security to Project workers, sites and/or assets is carried out in accordance with the ESSs:</p> <ul style="list-style-type: none"> a. Assess the risks and impacts of engagement of the security personnel, as part of the assessment referred to in action 1.2 a) above, and implement measures to manage such risks and impacts, including a stand-alone Security Management Plan, guided by the principles of proportionality and GILP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such [security or military] personnel. b. Adopt and enforce standards, protocols and codes of conduct for the selection and use of security or military personnel, and screen such personnel to verify that they have not engaged in past unlawful or abusive behavior, including sexual exploitation and abuse (SEA), sexual harassment (SH) or excessive use of force; c. Ensure that the MOH/Ghana Health Service enters into a memorandum of understanding (MoU), with the line ministry in control of security forces and relevant Security Unit, setting out the arrangements for the engagement of the military or security personnel under the Project, including compliance with the relevant requirements of this ESCP d. Ensure that such personnel are adequately instructed and trained, prior to deployment and on a regular basis, on the use of force and appropriate conduct (including in relation to civilian-military engagement, SEA and SH, and other relevant areas), as set out in the Project Operational Manual, ESMF, Security Management Plan, MoU; e. Ensure that the stakeholder engagement activities under the Stakeholder Engagement Plan (SEP) include a communication strategy on the involvement of security or military personnel under the Project. f. Ensure that any concerns or grievances regarding the conduct of security or military personnel are received, monitored, documented (taking into account 	<ul style="list-style-type: none"> a) Assessment carried out in the same timeframe as action 1.2 a) above and <i>any required measures shall be adopted before deploying security or military personnel under the Project and thereafter implemented throughout Project implementation or a stand-alone Security Management Plan shall be prepared and adopted before deploying security or military personnel under the Project and thereafter implemented throughout Project implementation.</i> b), c) and d) before deploying <i>security or military personnel</i> under the Project and thereafter throughout Project implementation. e) and f) as set out under actions 10.1 and 10.2 respectively. 	<p>PIU under the Ministry of Health and Ghana Health Service</p>
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	<p>the need to protect confidentiality), resolved through the Project's grievance mechanism (see action 10.2 below) and reported to the [Bank/Association] no later than 60 days after being received; and</p> <p>g. Where the Bank shall require, after consultation with the MOH: (i) promptly appoint a third- party monitor consultant, with terms of reference, qualifications and experience satisfactory to the Bank, to visit and monitor the Project area where military or security personnel are deployed, collect relevant data and communicate with Project stakeholders and beneficiaries; (ii) require the third-party monitor consultant to prepare and submit monitoring reports, which shall be promptly made available to and discussed with the Bank; and (iii) promptly take any actions, as may be requested by the Bank upon its review of the third-party monitor consultant reports.</p>		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	Not currently relevant based on the scope of the parent project and AF	Not relevant	Not relevant
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	Not relevant	Not relevant	Not relevant
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	Not relevant	Not relevant	Not relevant
ESS 8: CULTURAL HERITAGE			
	Not relevant. In the unlikely event tangible cultural heritage are identified, a chance finds procedure contained in the existing ESMF of the project will be followed for the project.	Not relevant	Not relevant
ESS 9: FINANCIAL INTERMEDIARIES			
	Not relevant.	Not relevant	Not relevant
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN: The updated SEP for the AF2 which was approved by the World Bank and disclosed on May 5, 2021 remains relevant for the AF3. The disclosed SEP is consistent with ESS10, and includes 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. The SEP complements the National Communication Strategy for COVID-19 Vaccine Introduction to address vaccine hesitancy and mistrust in parallel with the vaccine campaigns and the national vaccination exercise.</p>	<p>The SEP remains relevant to the AF3. The SEP shall be implemented throughout Project implementation.</p>	<p>PIU under the Ministry of Health</p>

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10.2	<p>GRIEVANCE MECHANISM: The grievance mechanism established for the Parent Project and AFs shall be maintained and operated 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 also receive, register, and address concerns and grievances related to sexual exploitation and abuse, sexual harassment in a safe and confidential manner, including through the referral of survivors to gender-based violence service providers.</p> <p>The grievance mechanism shall also receive, register, and address concerns arising from unintended health consequences after vaccination especially those resulting in serious adverse effects, and, as appropriate, requests for compensation.</p>	Throughout Project implementation.	PIU under the Ministry of Health
CAPACITY SUPPORT (TRAINING)			
CSI	The Project Implementation Unit and other relevant implementing support staff responsible for the Project to receive training on the Project's ESHS plans and instruments, fair, equitable and inclusive access and allocation of Project benefits <i>including with regards to vaccines</i> , and the roles and responsibilities of different key agencies in the ESF/ESS implementation including GRM and community structures	No later than 30 days of the Effective Date and periodically with the addition of new Project team members join the Project throughout implementation.	Ministry of Health