

REPUBLIC OF GHANA



GHANA ENERGY SECTOR RECOVERY PROGRAM (P173258)

Revised ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

May 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Republic of Ghana, (**the Recipient**), will implement the Ghana Energy Sector Recovery Program for Results (PforR) (**the Operation**) (P173258) including an Investment Project Financing (IPF) Component of the Operation (**the Project**). The Ministry of Energy (**MoEn**), Electricity Company of Ghana (**ECG**) and Ghana Grid Company Limited (**GRIDCo**) will be the main implementing institutions, with the involvement of the following agencies/units: Public Utilities Regulatory Commission (PURC), Ghana Alliance for Clean Cookstoves (GHACCO), Kwame Nkrumah University of Science and Technology-Technology Consultancy Center (KNUST-TCC), Energy Sector Recovery Program (ESRP) Ministerial Taskforce, National Petroleum Authority (NPA) and State Interest and Governance Authority (SIGA) as set out in the Financing Agreement and the Grant Agreement. The International Development Association (**the Association**) has agreed to provide the financing for the Operation as set out in the referred Agreement. This Environmental and Social Commitment Plan (ESCP) only applies to the Project.
2. The Recipient shall ensure that the Project is carried out in accordance with provisions of the Environmental and Social Standards (ESSs) and this ESCP, in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement and the Grant Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred legal 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 IPF Component, 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, the 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. 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, stakeholder engagement activities and grievances and functioning of the grievance mechanism(s).</p>	<p>Submit semi-annual reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than 30 days after the end of each reporting period.</p>	<p>ECG's PIU, with oversight support of MoEn's PCU</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 such as fire injuries, COVID-19 outbreak, communicable diseases. 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 hours for fatality or SEA/SH incidents.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association.</p>	<p>ECG's PIU</p>
C	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors to submit monthly monitoring reports, including E&S report to the Project Coordination Unit (PCU). These reports shall be submitted by the vendors / contractors to MoEn through ECG / NEDCO and by MoEn to the Association upon request.</p>	<p>The reports shall be submitted by vendors / contractors to the PCU through ECG's PIU monthly, and by the PCU to the Association upon request</p>	<p>MoEn's PCU through ECG's PIU.</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>The MoEn shall establish and maintain a PCU with qualified staff and resources to support management of E&S risks and impacts including an Environmental and Social Specialist and Gender Specialist. ECG shall assign an Environmental and Social Specialist on a full-time basis to manage E&S risks and impacts of ECG managed Project activities.</p>	<p>The MoEn has assigned an E&S Specialist to the PCU. However, a Gender Specialist will also be hired [or assigned] to the PCU before Project Implementation.</p>	<p>MoEn and ECG</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Ensure that adequate E&S clauses have been incorporated in the Memorandum of Understanding (MoU) to be developed to guide the project relationship between ECG and NEDCO.</p> <p>For works contracts, the Contractors (meter / ICT vendors or suppliers) will be required to engage Environmental and Social Safeguard Specialist(s) with responsibility for managing E&S aspects including gender and SEA/SH issues.</p>	<p>ECG has also assigned an E&S Specialist to the ECG PIU.</p> <p>The capacities of the E&S Specialists for the ECG PIU and the MoEn-PCU respectively, to manage E&S risks under the Project have been assessed as adequate. However, the capacity of the Gender Specialist, upon being hired [or assigned] to the PCU, will be assessed and cleared by the Association before confirmed for the post.</p> <p>The positions of the E&S and Gender Specialists, and resources for management of E&S risks and impacts will be maintained throughout Project implementation.</p> <p>The positions of Environmental and Social safeguard specialists by Contactors will be maintained throughout project implementation</p>	
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>a. ECG, through its PIU, prepared a draft ESMF which includes a Labor Management Procedure (LMP) and an Electronic Waste Management Plan (EMP) consistent with ESS2 and ESS3 respectively. The ESMF is undergoing reviews and will be finalized and disclosed by the Recipient before Board.</p> <p>b. MoEn, through ECG, has prepared an SEP, that provides the roadmap for the Project communications and active consultations with stakeholders in the design and delivery of the Project. The SEP also identifies the potential environmental and social risks associated with the Project, from the perspective of the stakeholders, and defines measures to mitigate the risks, through consensus-building with the stakeholders. The Recipient shall disclose, adopt and implement the SEP in a manner acceptable to the Association.</p>	<p>a) The draft ESMF, including the Electronic Waste Management Plan, and LMP, The ESMF is undergoing reviews and shall be finalized and disclosed by the Recipient before Board approval , and will be implemented throughout Project duration thereafter.</p> <p>b) The disclosed SEP will be implemented throughout Project duration.</p>	ECG's PIU, with oversight support of MoEn's PCU
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>These shall include but not limited to:</p>		

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>a. Incorporate 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/vendors/suppliers comply with the ESHS specifications of their respective contracts.</p> <p>b. Codes of Conduct (CoC) 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.</p> <p>c. All contractors and sub-contractors shall be required to prepare and submit to the PCU for approval and subsequently implement the approved Contractor’s Environmental and Social Management Plan (C-ESMPs). MoEn will ensure C-ESMP is costed, with enough budget to mitigate E&S risks.</p> <p>d. Monitor Contractor’s commitment and compliance.</p> <p>e. Ensure contractors provide details on contractor’s oversight on ESHS performance.</p> <p>f. Contractors shall develop workers grievance redress mechanism to handle concerns of their employees.</p> <p>g. Ensure that the contractors or sub-contractors – including contracted workers, community workers, primary supply workers, as appropriate – comply with the ESHS specifications of their respective contracts.</p>	<p>a. All relevant aspects of the ESCP including relevant E&S documents/ instruments/ plans will be incorporated into the ESHS specifications of the procurement document prior to the commencement of the bidding process. Compliance with these specifications will be ensured through the supervision of the ECG’s PIU throughout Project implementation.</p> <p>b. Sexual harassment and exploitation related codes of conduct, including training of workers shall be provided by the contracted vendors / suppliers prior to the commencement of their respective contracts and will be implemented throughout Project duration.</p> <p>c. A costed C-ESMP with enough budget to mitigate identified risks and approved by the MoEn’s PCU will be in place prior to commencement of Project works.</p> <p>d. Monitor commitment and compliance throughout contract implementation.</p> <p>e. Prior to commencement of contractors’ works and throughout contract implementation.</p> <p>f. A GRM will be developed by contractors (vendors, suppliers) prior to the commencement of their respective contracts and will be maintained throughout Project implementation.</p> <p>g. Throughout Project implementation.</p>	<p>ECG’s PIU, with oversight support of MoEn’s PCU</p> <p>Contractor, with oversight of ECG’s PIU</p> <p>Contractor, with oversight of ECG’s PIU and MoEn’s PCU</p> <p>ECG’s PIU, with oversight of MoEn’s PCU</p> <p>ECG’s PIU, with oversight of MoEn’s PCU</p> <p>Contractor, with oversight of ECG’s PIU and MoEn’s PCU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
			ECG's PIU, with oversight of MoEn's PCU
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project are carried out in a manner acceptable to the Association and are consistent with the ESSs.</p> <p>Thereafter ensure that the outputs of such activities comply with the terms of reference</p>	<p>Submit terms of reference for studies and other relevant TA activities to the Association for review and clearance before commencement of the activity.</p> <p>Throughout Project implementation.</p>	MoEn's PCU and ECG's PIU
1.5	<p>ENVIRONMENTAL AND SOCIAL MONITORING</p> <p>In delivering on its responsibility for monitoring and reporting on implementation of the ESCP, MoEn shall, in consultation with the Association, hire an independent E&S Consultant to conduct midterm and final Project E&S performance and compliance audits. The need to hire an independent consultant in this regard shall be re-assessed based on the implementation outcomes during the first year of implementation.</p>	<p>the need for an independent consultant to conduct mid-term and final audits will be re-assessed at the end of first year of implementation</p>	MoEn's PCU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement labor and working conditions consistent with applicable national laws, and the Association's ESS 2 objectives and requirements including, inter alia, provisions on good working conditions, management of workers' relationships, non-discrimination policy, occupational health and safety (including those related to use of office vehicles, provision of personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA / SH), forced labor, child labor, and grievance arrangements for Project workers, all in a manner acceptable to the Association.</p> <p>Consultants' contracts shall reflect appropriate labor and working conditions and specific measures on COVID-19 prevention.</p>	<p>Draft LMP as part of the ESMF has been prepared by MoEn and will be finalized and disclosed prior to Board approval. All relevant provisions of Labor management procedures including GBV and SEA/H risk mitigation measures will be incorporated into the bidding documents and maintained throughout Project implementation.</p>	MoEn's PCU and ECG's PIU
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	GRM shall be established prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	MoEn's PCU, ECG's PIU and Contractors
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>The MoEn and ECG shall prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESMF, in accordance with national requirements, ESS 2 and Good International Industry Practice (GIIP), or any subsequent tool that will be occasioned by the ESMF.</p> <p>Contractors working on the IPF Component Activities shall abide by the approved occupational, health and safety (OHS) plan/ measures. The OHS plan shall include prevention and response measures for managing communicable diseases.</p> <p>The MoEn's PCU and ECG's PIU E&S Specialists shall train/orientate employees of Contractors on various aspects of OHS relevant to the IPF activities on a regular basis.</p>	Contractor's OHS plan will be prepared as part of the C-ESMPs before commencement of works and will be maintained / enforced throughout Project implementation	MoEn's PCU, ECG's PIU and Contractors
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>ECG as part of the ESMF prepared a Hazardous and Electronic Waste Handling and Disposal Procedures. The ESMF specified procedures for collecting, transport, recycle and final disposal of electronic and hazardous waste.</p> <p>The MoEn and ECG will also ensure that waste minimization techniques such as buying in bulk and buying only required quantities are adopted and executed. Only licensed personnel and well-equipped recycling companies will be allowed to identify, handle and manage e-waste.</p>	Procedures have been developed as part of the draft ESMF and will be finalized by Board approval and will thereafter be implemented throughout Project implementation	ECG's PIU and MoEn's PCU
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Resource efficiency and pollution prevention and management measures were covered under the ESMF. Specific measures will be included in the applicable management plans prepared under 1.3, before commencement of any civil work.</p> <p>Furthermore, all contracts shall include requirements for proper disposal and containment of all solid waste (including waste electronic and electrical equipment).</p>	<p>Prior to signing contracts with meter vendors or suppliers and prior to funds being disbursed for specific Project activities.</p> <p>Prior to signing contracts with meter vendors or suppliers and prior to funds been disbursed for specific project activities.</p>	<p>ECG's PIU, with oversight of MoEn PCU.</p> <p>Contractors, with oversight of ECG's PIU and MoEn's PCU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Adopt and implement measures and actions to assess and manage any traffic and road safety risks that may be identified in the C-ESMPs to be developed by contractors/ sub-contractors under action 1.3c .	Prior to signing contracts with meter vendors / suppliers and throughout project implementation	Contractors, with oversight of ECG's PIU and MoEn's PCU
4.2	COMMUNITY HEALTH AND SAFETY Adopt and implement material measures to mitigate specific risks and impacts to the community assessed as part of the ESMF. Include material measures in the C-ESMP to be prepared by the Contractors in accordance with the Project's ESMF, in a manner consistent with ESS4.	Submit site-specific C-ESMPs that include material measures for mitigating ESS4 risks for the Association's approval before preparation of procurement documents and thereafter throughout project implementation.	Contractors and ECG's PIU, with oversight of MoEn's PCU
4.3	SEA AND SH RISKS Adopt appropriate/effective SEA/SH prevention and mitigation measures as part of the ESMF and consistent with ESS 4. The Project will assess site specific SEA/SH risk as part of C-ESMPs and material measures for addressing such risks will be included in Codes of Conduct and other instruments developed by Implementing Agency and Contractors.	Submit site-specific C-ESMPs that include material measures for mitigating SEA/SH risks for the Association's approval before the preparation of the procurement documents. Once approved, SEA/SH Risk Mitigation measures will be implemented throughout Project implementation.	Contractors and ECG's PIU, with oversight of MoEn's PCU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	This standard is not currently relevant to this Project. The outcome of E&S screening did not identify any potential risks and/or impacts relevant to ESS5		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	This standard is not currently relevant to this Project. The outcome of E&S screening did not identify any potential risks and/or impacts relevant to ESS6.		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	This standard is not currently relevant to this Project. There are no identified Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the project area.		
ESS 8: CULTURAL HERITAGE			
8.1	CHANCE FINDS		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	This standard is not currently relevant to this Project. The outcome of E&S screening did not identify any potential risks and/or impacts relevant to ESS8.		
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
	This standard is not currently relevant to this Project. No FI is involved in the Project.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement the Stakeholder Engagement Plan (SEP) for the IPF Component, to guide meaningful and inclusive stakeholder engagement throughout the Project lifecycle, 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>If major changes occur in the scope of the IPF component activities during implementation, the SEP shall be consulted upon, revised and publicly re-disclosed accordingly.</p>	Implement the disclosed SEP throughout Project implementation.	ECG's PIU, with oversight of MoEn's PCU
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate 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>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner. Between the Project Effective Date and when the GM will be established, the Project will continuously use the GM established during the Project preparation stage</p>	Establish the grievance mechanism no later than 3 months after Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation.	ECG's PIU, with oversight of MoEn's PCU
10.3	GENDER ACTION PLAN		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Develop and operationalize a gender action plan, as part of the stakeholder engagement efforts, to bridge identified gender gaps.	Throughout Project preparation and implementation	ECG's PIU, with oversight of MoEn's PCU
CAPACITY SUPPORT			
CS1	<p>The MoEn shall ensure that there is relevant training for [e.g., PCU/PIU staff, stakeholders, communities, IPF component workers etc] on:</p> <ul style="list-style-type: none"> • IPF/TA Project Management (Scope, Implementation, Monitoring and Reporting) • World Bank Environmental and Social Framework • Stakeholder Mapping and Engagement • E&S requirements of sub-projects (screening and mitigation measures) • E-Waste Management • Grievance Redress Mechanism • Occupational Health and Safety (including emergency preparedness and response) • Community Health and Safety • SEA/SH Risk Prevention and Mitigation • Gender and Disability inclusion training • Inclusion and Non-discrimination training • Documentation and reporting 	This will be done before commencement of the IPF Activities and periodically (as needed) - during Project implementation,	ECG's PIU and MoEn's PCU