

Republic of Ghana



**Environmental Protection Agency
and
Ministry of Lands and Natural Resources
Ghana Landscape Restoration and Small-Scale
Mining Project
(P171933)**

Negotiated

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

June 17, 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Ghana (hereinafter the **Recipient**) is planning to implement the Ghana Landscape Restoration and Small-Scale Mining Project (the **Project**), with the involvement of the following Agencies: Environmental Protection Agency (EPA) and Ministry of Lands and Natural Resources (MLNR). The International Development Association (hereinafter the **Association**) has agreed to provide financing for the Project.
2. The Recipient shall 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 Recipient shall 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 Framework (ESMF), Resettlement Policy Framework and Process Framework (RPF&PF), Environmental and Social Management Plans (ESMP), Resettlement Action Plans (RAP), and Stakeholder Engagement Plan (SEP), and the timelines specified in those E&S documents.
4. The Recipient shall be responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry and Agency referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by the Recipient as required by the ESCP and the conditions of the legal agreement, and the Association shall 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 Recipient, 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 Recipient shall agree to the changes with the Association and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Association and the Recipient. The Recipient shall 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 Recipient 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, labor influx, gender-based violence risks.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular reporting on the implementation of the ESCP, including but not limited to environmental, social, health and safety (ESHS) performance of the Project, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s) and other instruments prepared to mitigate and manage E&S risks and impacts.</p>	<p>Quarterly reporting throughout Project Implementation</p> <p>Reporting shall be quarterly as the Association is unable to have field visits due to COVID-19 and the fact that this is the first project under ESF which will be implemented by the Recipient. Reporting frequency may be changed during Project implementation when there is strong evidence of capacity and compliance.</p>	EPA and MLNR PCUs
B	<p>INCIDENTS AND ACCIDENTS</p> <p>The Project shall 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 situations of fatalities or serious bodily harm and incidents of Gender Based Violence.</p> <p>The Project shall provide enough detail 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 Association's request, prepare a report on the incident or accident, propose any measures to address it and prevent its recurrence, and keep the Association informed of</p>	<p>Promptly after taking notice of the incident or accident and at the latest 5 days after such events. For incidents classified as "serious" and "severe", notify the Association within 24 hours of such incidents occurring</p> <p>Any severe injury (requiring off-site medical care), sexual abuse, or fatality incident shall be reported to the Association within 24 hours with basic information.</p> <p>A detailed incident report including analysis of incident root cause and immediate actions taken shall be</p>	EPA and MLNR PCUs and all implementing agencies through the PCUs

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	the ongoing implementation of the said measures and plans.	submitted to the Association within two weeks (14 calendar days) after the initial notification.	
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>Ensure that under the terms of all contracts, contractors shall submit monthly E&S monitoring reports and shall take actions on issues of non-compliance or poor implementation. The implementing agencies shall maintain a record of all such reports and shall make these available for World Bank review on request. Regular monitoring reports to the Association (specified in A) will provide an overview of issues relating to contractor performance and follow up actions.</p>	Throughout Project implementation	EPA and MLNR PCUs
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain an organizational structure with qualified staff and resources to support management of E&S risks throughout Project implementation.</p> <p>EPA has designated an Environmental and Social Safeguard Officer, and the MLNR has appointed a consultant as Social Development and Gender Specialist. The MLNR is also in the process of recruiting an Environmental Management Specialist. The officer and specialists will ensure adequate risks identification, management and reporting consistent with the reporting requirements in the ESMF and this ESCP. These focal/specialists will be responsible for the day to day implementation of the required E&S documents.</p>	<p>EPA has already designated an Environmental and Social Safeguard Officer, and the MLNR has recruited a consultant as Social Development and Gender Specialist. The MLNR is also in the process of recruiting an Environmental Management Specialist.</p> <p>MLNR shall appoint an Environmental Management Specialist on the Project Management Team to support Project E&S requirements two months after</p>	EPA and MLNR PCUs and Implementing Agencies

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<p>The Project shall also designate Regional and District Level Environmental and Social Focal Points to support management of E&S risks.</p> <p>EPA and MLNR has designated/appointed Project coordinators that will serve as administrative heads and will oversee the implementation of the E&S instruments.</p>	<p>effectiveness and maintain throughout the Project implementation period.</p> <p>The Regional and District Level Environmental and Social Focal Points and Personnel have been appointed and will be maintained throughout the project implementation.</p>	<p>EPA and MLNR PCUs and Implementing Agencies</p> <p>EPA and MLNR PCUs and Implementing Agencies</p>
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>The project is preparing a Strategic Environmental and Social Assessment (SESA) that will analyze the Environmental and social Policy implications of the Artisanal and Small-Scale Mining (ASM) sector reforms being proposed under the project and inform interventions on revising ASM policies and regulations. The SESA will be reviewed and approved by the Association and will be disclosed during project implementation.</p> <p>Using the E&S screening tools, the Project will identify the potential risks of activities and determine relevant risks assessment and mitigation plans; i.e., Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plans (ESMPs); Abbreviated Resettlement Action Plan (ARAP), Resettlement Action Plan (RAP).</p>	<p>Before initiation of ASM policy reform activities under Component 2 of the Project.</p> <p>Throughout Project implementation. Once prepared and approved, tools and instruments apply throughout Project implementation.</p>	<p>MLNR PCU</p> <p>EPA and MLNR PCUs</p>
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>The project has prepared a Stakeholder Engagement Plan (SEP), Environmental and Social Management Framework (ESMF) and a Resettlement Policy Framework & Process Framework which</p>	<p>Already prepared and approved</p>	

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>has been reviewed, approved and disclosed by the Government of Ghana and the World Bank.</p> <p>The Project shall screen any proposed activities in accordance with the screening tool provided in the ESMF prepared for the Project and, thereafter, draft, adopt, and implement mitigation plans; i.e., Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs), Resettlement Action Plan (RAP), Abbreviated Resettlement Action Plan (ARAP), Biodiversity Management Plans (BMP) and other instruments as required, in a manner acceptable to the Association.</p> <p>The Project shall ensure ESIAs/ESMPs cover assessment of all risks and corresponding mitigation measures including potential Sexual Exploitation and Abuse (SEA)/ Sexual Harassment (SH) risks.</p> <p>The Project shall ensure that where these instruments are to be implemented by the Contractor(s), they are operationalized by the Contractor(s) through the Contractor Environmental and Social Management Plans (C-ESMP) in compliance with the Project ESMF.</p> <p>The Project shall ensure that all Terms of Reference (TOR) for policy reform initiatives and Technical Assistance to review policy changes require that due consideration is given to E&S implications of proposed reforms in accordance with the ESF.</p>	<p>The ESIAs/ESMPs/RAP/ARAP and other required instruments must be prepared, reviewed and cleared by the Association and disclosed prior to commencement of civil works or other project activities to which they may apply.</p> <p>Once prepared and approved, tools and instruments apply throughout Project implementation.</p> <p>The E&S instruments must be submitted for the Association approval before launching the bidding process for the respective activity. Once approved, the ESMPs are carried out throughout Project implementation.</p> <p>During Project implementation</p> <p>During project implementation when TORs will be developed. Submitted for the Association approval prior to contracting Technical Assistance.</p>	<p>EPA and MLNR PCUs</p> <p>Screening of the sustainable land and water management subprojects is a responsibility of the relevant TCOs</p> <p>EPA/MLNR PCUs</p>
<p>1.4</p>	<p>MANAGEMENT OF CONTRACTORS</p>	

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>The Project 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 enough budget to mitigate E&S risks. • Monitor Contractor commitment and compliance. • Ensure contractors provide details on contractor’s oversight on ESHS performance. • Contractor to develop a grievance redress mechanism to handle concerns of their employees. 	<p>Prior to the preparation of procurement documents. Supervise contractors throughout Project implementation</p>	<p>EPA and MLNR PCUs</p>
<p>1.5 PERMIT, CONSENTS AND AUTHORIZATIONS</p> <p>The Project shall seek and obtain the necessary approvals, permits and authorizations from the Environmental Protection Agency, Minerals Commission, Water Resources Commission, District Assemblies and from other relevant national authorities and regulatory agencies as applicable.</p> <p>The Project shall comply or cause to comply, as appropriate, with the conditions established in these permits, consents and</p>	<p>Prior to initiating activities that require permits, consents and authorizations.</p>	<p>EPA and MLNR PCUs</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	authorizations throughout Project implementation.		
1.6	<p>THIRD PARTY MONITORING The Project shall engage an independent consultant who shall be required to undertake an environmental and social audit (ESA) to verify the monitoring of the environmental and social impacts of the project at the mid-term and end of the project.</p>	Mid-term and end of Project	EPA and MLNR PCUs
	<p>CONTINGENT EMERGENCY RESPONSE FINANCING:</p> <p>a. Ensure that the CERC manual as specified in the financing agreement includes general provisions related to the environmental, social, health, and safety assessment and management arrangements for the implementation of the Contingent Emergency Response Component, in accordance with the ESSs.</p> <p>b. Prepare and disclose a CERC-ESMF Addendum</p> <p>c. Prepare, disclose, consult, and adopt any environmental and social (E&S) management plans or instruments which may be required for activities under the Contingent Emergency Response Component of the Project, in accordance with the CERC Manual and CERC-ESMF Addendum and the ESSs, and thereafter implement the measures and actions required under said E&S management plans or instruments, within the timeframes specified in said E&S management plans or instruments.</p>	<p>a. The adoption of the CERC manual in form and substance acceptable to the Association is a withdrawal condition for Category 6 under Section III. A of Schedule 2 of the Financing Agreement for the project.</p> <p>b. The preparation and disclosure of the CERC-ESMF in form and substance acceptable to the Association is a withdrawal condition for Category 6 under Section III. A of Schedule 2 of the Financing Agreement for the project.</p> <p>c. The E&S management plans or instruments shall be prepared, disclosed, consulted, and thereafter adopted before the carrying out of the relevant project activities under the Contingent Emergency Response Component of the Project. The E&S management plans or instruments shall be implemented in accordance with their terms, throughout Project implementation.</p>	EPA and MNLR PCUs

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>The Project shall establish, maintain, and operate a grievance mechanism for Project workers, as described in the Labor Management Procedures prepared for the Project and consistent with ESS2.</p>	Grievance mechanism operational prior to engaging Project workers and maintained throughout Project implementation	EPA and MLNR PCUs
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESMP.</p>	OHS Measures operational prior to engaging Project workers and maintained throughout Project implementation	EPA and MLNR PCUs
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</p> <p>Resource efficiency and pollution prevention and management measures will be covered under the ESMP to be prepared under action 1.2 above.</p> <p>Include in all contractor contracts requirements for proper disposal of all liquid and solid waste (including plastic trash) and construction waste, sanitation management, including management of any associated dust emission, and management of potential pollution of water sources, noise impacts during construction and operation as specified in the ESMF.</p> <p>The Project shall adopt measures that will optimize the use of water and energy to the extent technical and financially possible for project activities involving significant use of water and energy. Contractors shall be required to consider water and energy conserving measures into the design of such sub-projects or adopt alternative design that will ensure that that energy and water use does not lead to adverse impacts on communities, other users and</p>	<p>Prior to signing contractor contracts</p> <p>Prior to sub-project implementation</p>	EPA and MLNR PCUs

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<p>environment.</p> <p>Include, in each contractor contract, a requirement to restore any newly-created borrow pits.</p>		
3.2	<p>PEST MANAGEMENT: Implement the Integrated Pest Management Plan prepared for the Project and included in the ESMF as relevant to specific activities.</p>	Throughout project implementation	All Implementing Agencies
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY: Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs to be developed when sites are identified.</p>	Prior to signing contractor contracts and during project implementation	EPA and MLNR PCUs
4.2	<p>COMMUNITY HEALTH AND SAFETY: Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities including in relation to labor influx, response to emergency situations and include these measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Association.</p>	Prior to signing contractor contracts and during project implementation	EPA and MLNR PCUs

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.3	<p>GBV AND SEA RISKS:</p> <p>The Project shall clearly define the Gender-Based Violence (GBV) requirements and expectations as per the ESMF in the bid documents.</p> <p>The Project shall review C-ESMPs to verify that appropriate mitigation actions are included.</p> <p>The Project shall ensure that site specific ESMP(s) to be developed will include GBV Action Plan to assess and manage the risks of GBV/SEA/SH.</p>	<p>Prior to issuance of the bids</p> <p>Prior to signing contractor contracts</p>	EPA and MLNR PCUs
4.4	<p>GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION:</p> <p>The Project shall implement measures and actions to assess and manage the risks of GBV and SEA /SH as outlined in the ESMF. The project GRM will take into consideration sensitivity relating to complaints link with SEA/SH. The GRM will include a special protocol for receiving and managing GBV cases.</p>	Throughout Project implementation	EPA and MLNR PCUs and all implementing agencies
4.5	<p>TRAINING FOR THE COMMUNITY:</p> <p>Conduct activities for the communities designed to heighten awareness of risks and to mitigate impacts specified in this section, through routine engagements with the communities as part of project activities</p>	Throughout project implementation	EPA/MLNRs and District Planning and Management Teams
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
5.1	<p>RESETTLEMENT PLANS: The Project shall prepare, adopt, and implement resettlement action plans (RAP) / abbreviated resettlement action plans (ARAP) in accordance with ESS 5 and consistent with the requirements of the RPF&PF that has been prepared for the Project, and thereafter adopt and implement the respective RAPs / ARAPs before carrying out the associated activities, in a manner acceptable to the Association.</p>	<p>RAPs /ARAP submitted for the Association's approval and, once approved, implemented prior to commencing Project activities that involve land acquisition and resettlement restrictions.</p> <p>Throughout Project implementation</p>	All implementing agencies
5.2	<p>GRIEVANCE MECHANISM: A Grievance Mechanism will be established and implemented to address resettlement related complaints as described in the RPF&PF.</p>	<p>Prior to commencement of resettlement activities Throughout project implementation</p>	All implementing agencies
5.3	<p>RESTRICTION OF ACCESS: The project shall implement the RPF&PF with respect to Project activities which may cause restrictions in access to natural resources in legally designated parks and protected areas. The RPF&PF establishes a process by which members of potentially affected communities participate in design of project components.</p> <p>The Project shall implement livelihoods activities in communities that experience restriction of access to protected areas as a result of the project, consistent with the RPF&PF.</p>	<p>Prior to start of referenced project activity planning and throughout project implementation</p>	Forest Services Division and Wildlife Division of the Forestry Commission
5.4	<p>MONITORING AND REPORTING The Project shall ensure monitoring and reporting on land acquisition, displacement and resettlement activities throughout project implementation as part of regular reporting.</p>	<p>As part of regular E&S reporting under the project, according to section A, throughout Project implementation</p>	EPA and MLNR PCUs
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS:</p>		All implementing agencies

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<p>Screen Project activities (including civil works) to avoid any significant loss or degradation of natural habitats and to avoid damaging any protected areas or critical habitats, in accordance with the Project ESMF.</p> <p>If need for Biodiversity Management Plans (BMP) is determined through the screening process where significant risks and adverse impacts on biodiversity have been identified, the Project will prepare and implement the plans as part of the site specific ESMPs.</p> <p>Ensure that Forest and Protected Areas Management Plans prepared under the project adequately incorporate biodiversity considerations, consistent with the provisions of ESS6.</p>	<p>Submit BMP for the Association's prior approval prior to commencement of construction activities that may have significant risks and adverse impacts on biodiversity.</p> <p>Once approved the plan should be implemented throughout Project implementation.</p>	<p>Forest Services Division and Wildlife Division of the Forestry Commission</p>
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Not relevant to the project		
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS:</p> <p>The Project has included a chance find procedure in the prepared ESMF and this will also be included in relevant procurement and contract documents for contractors to ensure implementation.</p>	Prior to signing contractor contracts	EPA and MLNR PMUs
8.2	<p>CULTURAL HERITAGE:</p> <p>The ESMF has included provisions related to cultural heritage to ensure that consideration of ESS8 requirements is included in ESMPs and Forest and Protected Areas Management Plans prepared under the project if and as required.</p>	Prior to approval of respective plans	Forest Services Division and Wildlife Division of the Forestry Commission
ESS 9: FINANCIAL INTERMEDIARIES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
9.1	Not relevant to the project		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN AND IMPLEMENTATION:</p> <p>The Project shall implement and monitor the implementation of the SEP; and document any commitments or actions agreed during consultations, including changes resulting from changes in the design of the Project or the SEP. The Project will track the SEP and other Citizen Engagement mechanisms under the project.</p>	Throughout Project implementation	EPA and MLNR PCUs
10.2	<p>PROJECT GRIEVANCE MECHANISM:</p> <p>The Project shall prepare, adopt, maintain and operate a grievance mechanism as described in the SEP.</p>	Prior to start of implementation of activities and throughout Project implementation	EPA and MLNR PCUs
10.3	<p>STAKEHOLDER ENGAGEMENT PRINCIPLES IN PROJECT SUPPORTED PROCEDURAL REFORM:</p> <p>The Project shall review any new procedural reform or Technical Assistance activities to ensure procedures for stakeholder engagement, consensus building, information disclosure and so on are embedded within new procedure.</p>	Throughout Project implementation	MLNR and MC
CAPACITY SUPPORT (TRAINING)			
	Training to be provided	Targeted Groups	Timeframe for Delivery
CS1	The Project shall require contractors to undertake Construction phase training on occupational health and safety including emergency prevention and preparedness and response arrangements to emergency situations.	Project workers and contractor workers	Prior to and during construction
CS2	Training on Codes of Conduct to ensure requirements of CoCs are clearly understood by those signing.	Project and contractor workers, Consultants.	Prior to the start of construction

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
CS3	<p>The following training will be undertaken for relevant Project staff and district level implementing agencies' staff.</p> <ul style="list-style-type: none"> • Project Management (scope, implementation, monitoring and Reporting) • World Bank Environmental and Social Framework and Standards • National Environmental Requirements • Sub-project Screening and Scoping • Grievance redress • Community health and safety • Occupational Health and Safety • Environmental and Social Report preparation and other reporting requirements • GBV/SEA risk management and child rights protection • Gender and Disability inclusion • Information on World Bank's Safeguards Incidents Reporting Tool (SIRT) provided. 	Staff leading implementation of Project supported activities in targets areas – district, regional and national level staff	Throughout Project implementation