

Republic of Ghana
Ministry of Finance

**Public Financial Management for Service
Delivery Program (PFM₄SD) - P176445**

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

May 9, 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Ghana (**the Recipient**), through the Ministry of Finance (MoF), will implement the Public Financial Management for Service Delivery Program (P176445) including the Investment Project Financing (IPF) Component (**the Project**) and the Program for Results (PforR) Program (**the Program**), with the involvement of the Ministry of Public Enterprises (MoPE), Ghana Audit Service (GAS), Internal Audit Agency (IAA), Ghana Revenue Authority (GRA), Controller and Accountant General's Department (CAGD), State Interests and Governance Authority (SIGA), Public Procurement Authority (PPA), National Development Planning Commission (NDPC), and Parliament, as set out in the Financing Agreement. The International Development Association (the **Association**) has agreed to provide financing for the Program, as set out in the referred agreement(s). 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 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. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient 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 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 Effectiveness Date.</p>	<p>Ministry of Finance Program Coordination Office (MoF-PCO)</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.</p> <p>Provide subsequent report to the Association within 20 days after request by the Association.</p>	<p>MoF-PCO</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>The Recipient shall establish and maintain a Program Coordination Office (PCO) with qualified staff and resources to support management of ESHS risks and impacts of the Project.</p> <p>The MoF shall appoint one environmental and social (E&S) specialist to lead E&S risk management and stakeholder consultations, with terms of reference, experience, and qualification acceptable to the Association.</p> <p>Appoint E&S Focal Persons in each participating institution.</p>	<p>Establish and maintain a PCO as set out in the Financing Agreement.</p> <p>Appoint the E&S specialist no later than 3 months after the Effectiveness Date, and thereafter maintain this position throughout Project implementation.</p> <p>Appoint the E&S focal persons no later than 3 months after the Effective Date, and thereafter maintain these positions throughout Project implementation.</p>	<p>MoF-PCO</p> <p>MoPE, GAS, IAA, CAGD, SIGA, PPA, NDPC, and Parliament</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>Adopt and implement the Stakeholder Engagement Plan (SEP) that has been prepared for the Project.</p> <p>Update and redisclose the SEP when and as needed during the project implementation.</p>	<p>The SEP is already finalized and disclosed. Adopt and implement the SEP throughout the Project.</p> <p>Where changes occur, consult upon, update and redisclose the SEP, as needed and thereafter implement throughout the Project.</p>	MoF-PCO
1.3	<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>	MoF-PCO
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>The Project shall be implemented primarily by government staff, who will be subject to the terms and conditions of their existing public sector employment agreements and to applicable ESS2 requirements relating to child labor, minimum age and occupational health and safety (OHS), unless there has been an effective legal transfer of their employment or engagement to the Project (in which case they shall be treated as Project workers and subject to all ESS2 requirements). All other Project workers that may be recruited, shall be engaged in the implementation of the Project in a manner consistent with ESS2 and acceptable to the Association.</p> <p>If the preparation of Labor Management Procedures (LMP) becomes necessary, LMP shall be prepared, disclosed, consulted upon, adopted and implemented consistent with ESS2 and in a manner acceptable to the Association.</p>	Throughout Project implementation.	MoF-PCO

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		The terms of reference for the LMP shall be submitted to the Association for review and clearance before commencement of preparation.	
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, consistent with ESS2.	Establish grievance mechanism prior to hiring Project workers and maintain and operate thereafter throughout Project implementation.	MoF-PCO
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
	This standard is not relevant for this Project. The Project will not finance activities that may generate pollution. The risk of solid waste generation and GHG will be negligible.		
ESS 4: COMMUNITY HEALTH AND SAFETY			
	This standard is not relevant for this Project.		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	This standard is not relevant for this Project. The Project will not require land acquisition that would result in the impacts covered under this Standard.		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	This standard is not 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 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			
	This standard is not relevant to this Project. No activity under the Project will adversely affect cultural heritage.		
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
	This standard is not relevant to this Project. No FI is involved in the Project		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Adopt and implement the Stakeholder Engagement Plan (SEP) for the Project, 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	The SEP is already finalized and disclosed. Adopt and implement the SEP throughout Project implementation.	MoF-PCO

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	<p>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 TA activities during implementation, the SEP shall be consulted, revised and publicly re-disclosed accordingly.</p>		
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, 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 through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	<p>Establish the grievance mechanism no later than one month after the Effective Date and thereafter maintain and operate the mechanism throughout Project implementation.</p>	MoF-PCO
CAPACITY SUPPORT			
CS1	<p>The following training will be undertaken for relevant MoF staff and consultants and Implementing Agencies' staff.</p> <ul style="list-style-type: none"> • TA Project Management (scope, implementation, monitoring and Reporting) • World Bank Environmental and Social Framework • Grievance redress mechanism • SEA/SH risk management • Gender and disability inclusion • Information on E&S Incidents Reporting • Occupational Health and Safety Training as related to use of project vehicles • Stakeholders Engagement Plan (SEP) 	<p>No later than 90 days after the Effective Date and repeated periodically throughout Project implementation.</p>	MoF-PCO