

The Government of Ghana/Ministry of Health

**Ghana COVID-19 Emergency Response on
Vaccines Second Additional Financing (P176485)**

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

May 10, 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of The Republic of Ghana is planning to the second Additional Financing (AF) support of the Ghana COVID-19 Emergency Preparedness and Response Project to enable affordable and equitable access to COVID-19 vaccines and effective vaccine deployment in Ghana. The project will be implemented through the Ghana Health Service (GHS) under the Ministry of Health (MOH). The International Bank for Reconstruction and International Development Association 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 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.

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, any COVID outbreak in the Project area. Provide sufficient 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 [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 48-72 hours after the PIU have become aware of the incident or accident. Upon request from the Bank, a report that detail root causes and corrective actions would be provided within a timeframe acceptable to the Bank</i>	PIU under the Ministry of Health
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE: The Ministry of Health and Ghana Health Service have established and have established a Project Implementation Unit (PIU) under the parent project and appointed focal points for environmental and social risk management and Stakeholder Consultations. <i>The focal points have the expertise and are responsible for managing E&S issues.</i> 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

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</p> <p>a. The project will update and redisclose the Environmental and Social Management Framework (ESMF) for the parent project to assess the environmental and social risks and impacts of the proposed subproject activities, in accordance with the ESS, 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. ESMF and health-care waste management plans as may be required for the respective subproject activities in accordance with the ESS, 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. Incorporate the relevant aspects of this ESOP, including, inter alia, the ESMF and ESMFs, 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>d. Adopt procedures, protocols and/or other measures to ensure the Project does not include forced vaccination and is acceptable to the Bank, as set out in the ESMF.</p>	<p>a. ESMF shall be updated, redisclosed, consulted and adopted before the Effectiveness Date. 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. The relevant ESHS measures shall be incorporated into the bidding documents before launching the procurement process for the relevant subproject activities and shall thereafter complied with throughout the carrying out of such activities.</p> <p>d. throughout project implementation.</p>	<p>PIU under the Ministry of Health</p>
<p>1.3</p> <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 is in place. • All the other excluded activities set out in the ESMF of the Project. 	<p>During the assessment process conducted under action 1.2.a. above.</p>	<p>PIU under the Ministry of Health</p>
<p>1.4.</p>	<p>CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING The AF does not include a CERC.</p>	<p>Not applicable</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT: The Project shall be carried out in accordance with the applicable requirements of ESS2 including through, inter alia, implementing adequate occupational health and safety measures (including personal protective equipment, and emergency preparedness and response measures), setting out grievance mechanisms for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.	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 GILP including relevant WHO guidelines; and 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			
4.1	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.	Throughout Project implementation.	PIU under the Ministry of Health, Ghana Health Service

<p>4.2</p>	<p>USE OF MILITARY OR SECURITY PERSONNEL: 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> <p>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;</p> <p>a. 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;</p> <p>b. 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</p> <p>c. 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;</p> <p>d. 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;</p> <p>e. Ensure that any concerns or grievances regarding the conduct of security or military personnel are received, monitored, documented (taking into account the need to protect confidentiality), resolved through the Project's grievance mechanism (see action 10.2 below) and reported to the [Bank/Association] no</p>	<p>a) Assessment carried out in the same timeframe than action 1.2 a) above and 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.</p> <p>b), c) and d) before deploying security or military personnel under the Project and thereafter throughout Project implementation.</p> <p>e) and f) as set out under actions 10.1 and 10.2 respectively.</p> <p>g) within the timeframes requested by the Bank.</p>	<p>PIU under the Ministry of Health and Ghana Health Service</p>
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>later than 60 days after being received; and</p> <p>f. 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	Not relevant	Not relevant
ESS 9: FINANCIAL INTERMEDIARIES			
	Not relevant.	Not relevant	Not relevant
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>10.1 STAKEHOLDER ENGAGEMENT PLAN: Prepare or revise, disclose, consult, adopt and implement a Stakeholder Engagement Plan (SEP) 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. The SEP will complement 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 for the parent project has been updated and consulted upon, and shall be disclosed prior to appraisal. The SEP shall be implemented throughout Project implementation.</p>	<p>PIU under the Ministry of Health</p>
<p>10.2 GRIEVANCE MECHANISM: An accessible grievance mechanism shall be established, publicized, 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 the, 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>	<p>Throughout Project implementation.</p>	<p>PIU under the Ministry of Health</p>
<p>CAPACITY SUPPORT (TRAINING)</p>		
<p>CS1 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.</p>	<p>No later than 30 days of the Effective Date and periodically with the addition of new Project team members join the Project throughout implementation.</p>	<p>Ministry of Health</p>