

The Republic of Ghana

Tree Crop Development Authority (TCDA) and Ghana Cocoa Board (COCOBOD)

Ghana Tree Crop Diversification Project (P180060)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

For Negotiation
6 March 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Ghana (the Recipient) will implement the Ghana Tree Crop Diversification Project (the Project), with the involvement of the Tree Crop Development Authority (TCDA) and Ghana Cocoa Board (COCOBOD), as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the referred agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (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 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, through the Chief Executive Officers of TCDA and COCOBOD, 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, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	<p><i>Submit six-monthly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than five (5) working days after the end of each reporting period.</i></p>	TCDA and COCOBOD
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. 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><i>Notify the Association no later than 48 hours after learning of the incident or accident and not later than 24 hours in cases of fatality and SEA/SH.</i></p> <p><i>Provide subsequent report to the Association within a timeframe acceptable to the Association.</i></p>	TCDA and COCOBOD
C	<p>CONTRACTORS’ MONTHLY REPORTS</p> <p>Require contractors, and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association upon request.</p>	<p><i>Submit the monthly reports to the Association upon request throughout the Project’s implementation period starting from the Project Effective Date.</i></p>	TCDA and COCOBOD
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p>		TCDA and COCOBOD

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>Establish and maintain a Project Coordination Unit (PCU) and Project Implementation Unit (PIU) at TCDA and COCOBOD respectively, with qualified staff and resources to support management of ESHS risks and impacts of the Project including qualified environmental and social risk management staff (an Environmental Specialist, and a Social Specialist, for both PCU and PIU). Appoint a Gender Specialist for the PCU, with experience and qualifications acceptable to the Association, to provide technical support and oversight on gender issues for both the PCU and the PIU. Ensure that all E&S Specialists have representation in the senior management to have overall accountability for the environmental and social performance).</p> <p>Establish and maintain a child labor risk mitigation desk including an expert on child right with terms of reference acceptable to the Association at TCDA and COCOBOD to oversee and coordinate the implementation of the Child Labor Sub-component Part 1.3 of the Project.</p>	<p><i>Appoint one Environmental Specialist and one Social Specialist for the TCDA PCU prior to the Effective Date and thereafter maintain these positions throughout Project implementation</i></p> <p><i>Appoint one Environmental Specialist and one Social Specialist for the COCOBOD PIU prior to the Effective Date and thereafter maintain these positions throughout Project implementation.</i></p> <p><i>Appoint one Gender Specialist for the TCDA PCU no later than three (3) months after Effective Date, and thereafter maintain this position throughout Project implementation.</i></p> <p><i>Establish the child labor risk mitigation desk at TCDA and COCOBOD not later than three (3) months after Effective Date and thereafter maintain the function throughout Project implementation.</i></p>	
<p>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. Prepare, disclose, consult upon, adopt and implement site-specific Environmental and Social Impact Assessments (ESIAs), and corresponding Environmental and Social Management Plans (ESMPs) and Resettlement Action Plans (RAPs), as needed, consistent with the relevant ESSs.</p>		<p>TCDA and COCOBOD</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>2. An Environmental and Social Management Framework (ESMF) was prepared, disclosed, consulted upon and adopted for the Project before appraisal and shall be implemented throughout Project implementation . The ESMF includes an Exclusion List consisting of the activities that will not be eligible for Project financing, including, inter alia : (i) establishment of farms in legally protected areas, (ii) expansion of farms into protected forests, reserved forests, state forests and wildlife parks, (iii) substantial depletion of habitats and biodiversity, (iv) use of forced labor, (v) use of child labor, (vi) over-abstraction of water resources, and (vii) use of unregistered and unapproved agrochemicals/pesticides.</p> <p>3. Cause Cocoa Research Institute of Ghana (CRIG), Oil Palm Research Institute of Council for Scientific and Industrial Research (CSIR-OPRI), Crop Research Institute (CSIR-CRI) and all other subproject entities to adopt and implement the subproject and site-specific Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP), as set out in the ESMF and consistent with ESSs. The proposed activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p> <p>4. To implement subcomponent 2.2 of the Project, the borrower will cause COCBOD to implement a program for clearing cocoa trees affected by Cocoa Swollen Shoot Virus Disease (CSSVD), strictly based on voluntary farmer participation, for which COCBOD will enter into agreements acceptable to the Association with those farmers who wish to take part in the program, as further described in the Project Implementation Manual (PIM)</p>	<p>1. <i>Submit relevant terms of reference (TORs) for ESIA and ESMP/RAP studies to the Association for review and clearance prior to commencement of the activity. Prepare, consult upon, submit for the Association’s clearance, and disclose the site-specific instruments such as the ESIA, ESMP, RAP etc. before commencement of the Project activities that require them.</i></p> <p>2. <i>Implement the ESMF throughout Project implementation.</i></p> <p>3. <i>Adopt the ESIAs, ESMPs, RAPs etc before launching the bidding process for the respective Project activity that requires the adoption of such instruments. Once adopted, implement the respective ESIA, ESMP, RAP throughout Project implementation.</i></p> <p>4. <i>Before commencement of the program for clearing cocoa trees affected by Cocoa Swollen Shoot Virus Disease (CSSVD) in affected farms.</i></p>	
<p>1.3 MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the management tools and instruments referred to in Section 1.2 above, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications, including codes of conduct of their respective contracts.</p>	<p><i>During the preparation of procurement documents and before the start of activities by contractors.</i></p>	<p>TCDA and COCBOD</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		<i>Supervise the application of these measures throughout Project implementation.</i>	
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	<i>Throughout Project Implementation</i>	TCDA and COCOBOD
ESS 2: LABOUR AND WORKING CONDITIONS			
2.1	<p>LABOUR MANAGEMENT PROCEDURES</p> <p>Labour Management Procedures were prepared, disclosed, and consulted upon before appraisal. Adopt and implement the Labour Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health, and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labour, child labour, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	Adopt the LMP prior to engaging Project workers and thereafter implement the LMP throughout Project implementation.	TCDA and COCOBOD
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	<i>Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.</i>	TCDA and COCOBOD
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Develop and implement a Waste Management Plan (WMP) either as a standalone plan or as part of the ESMP, to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	<i>Develop the WMP prior to commencement of waste generation activities under component 2 and 3, and thereafter implement the WMP throughout Project implementation.</i>	TCDA, COCOBOD
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.2 above.</p>	<i>Same timeframe as for the adoption and implementation of the ESMP</i>	TCDA and COCOBOD

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	An Integrated Pest Management Plan (IPMP) was prepared, consulted upon, disclosed and adopted for the Project before appraisal. Implement the IPMP for the Project, consistent with the relevant ESSs.	<i>Implement the IPMP throughout Project implementation.</i>	
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action [1.2] above.	<i>Same timeframe as for the adoption and implementation of the ESMP.</i>	TCDA and COCOBOD
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities including, behavior of Project workers, risks of labour influx, response to emergency situations, SEA/SH, COVID-19 and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF, consistent with ESS4.	<i>Same timeframe as for the adoption and implementation of the ESMPs.</i>	TCDA and COCOBOD
4.3	SEA AND SH RISKS Develop and implement a SEA/SH Prevention and Response Action Plan as part of the ESMP, to assess and manage the risks of SEA and SH, consistent with ESS4.	Same timeframe as for the adoption and implementation of the ESMPs and	TCDA and COCOBOD
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT POLICY FRAMEWORK A Resettlement Policy Framework (RPF) was prepared, disclosed, consulted upon, and adopted for the Project before appraisal and shall be implemented throughout Project implementation , consistent with ESS5.	Implement the RPF throughout Project implementation.	TCDA and COCOBOD
5.2	RESETTLEMENT PLANS Prepare, disclose, consult upon, adopt and implement a Resettlement Action Plan (RAP) for each activity under the Project for which the RPF requires such RAP, as set out in the RPF and consistent with ESS5.	Prepare, disclose, consult upon, adopt and implement the respective RAP, including ensuring that before taking possession of the land and related assets, full compensation has been provided and, as applicable, displaced people have been resettled and moving allowances have been provided.	TCDA and COCOBOD
5.3	GRIEVANCE MECHANISM	<i>Same timeframe as for establishing and operationalizing the Project GM</i>	TCDA and COCOBOD

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Adopt and implement the Grievance Mechanism as described in the SEP and referred to in action 10.1 below for resolution of grievances related to land acquisition and involuntary resettlement.		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Screen Project activities in light of the exclusion criteria of the ESMF to avoid any development in biologically sensitive areas and protected areas.</p> <p>Adopt and implement measures to address biodiversity risks as part of the Project ESMF and subproject ESIA and ESMPs to be subsequently developed consistent with ESS6.</p>	<p><i>Throughout Project implementation</i></p> <p><i>Adopt biodiversity management measures in the same timeframe as for the adoption and implementation of the ESIA and ESMPs, and thereafter implement the measures throughout Project implementation.</i></p>	TCDA and COCOBOD
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Not relevant for this project		
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS</p> <p>Adopt and implement the chance finds procedures described in the ESMF of the Project.</p>	Implement the procedures throughout Project implementation.	TCDA and COCOBOD
ESS 9: FINANCIAL INTERMEDIARIES			
	Not relevant for this project		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>A Stakeholder Engagement Plan (SEP) was prepared, disclosed, consulted upon, and adopted before appraisal, consistent with ESS10, which 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.</p>	Implement the SEP throughout Project implementation.	TCDA and COCOBOD
10.2	<p>PROJECT GRIEVANCE MECHANISM</p>		TCDA and COCOBOD

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<p>Establish, publicize, maintain, and operate the grievance mechanism described in the SEP, RPF and LMP 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>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>		<p><i>Establish the grievance mechanism no later than 3 months after Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation.</i></p>	
CAPACITY SUPPORT			
CS1	<p>Conduct training needs assessment on integrated pest management (IPM), develop an IPM training action plan and implement the plan</p> <p>Train Implementing Partners (IPs), contractors, consultants and workers on the following which could be expanded as required:</p> <ul style="list-style-type: none"> • Stakeholder mapping and engagement • Environmental and social screening • Environmental and social management • Climate change and variability • Emergency preparedness and response • Community health and safety • Vector/Pest risk management using IPM approach • Child Labor Prevention and Mitigation • SEA/SH risk management • Occupational health and safety • Training on the Gender inclusion action plan 	<p><i>Conduct IPM training needs assessment no more than 60 days after Effective Date and thereafter implement the training action plan throughout the project</i></p> <p><i>Throughout Project Implementation</i></p>	TCDA and COCOBOD
CS2	<p>PIU/PCU staff and Project workers will be trained on (not restricted to):</p>	<p><i>Throughout Project Implementation</i></p>	TCDA and COCOBOD

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> • Occupational health and safety (including COVID-19 mitigation measures) • Emergency prevention and preparedness and response – e.g., fire fighting • Introduction to World Bank ESF • Child Labor Risk Assessment and Mitigation • Introduction to environmental and social assessment (and targeting and tailoring effective baselines and mitigation measures) 		