

Client:  
West African Power Pool (WAPP)



Countries:  
Ghana, Côte d'Ivoire



# 400/330kV WAPP GHANA - CÔTE D'IVOIRE INTERCONNECTION REINFORCEMENT PROJECT Feasibility Study & Line Route and Environmental and Social Studies



## DRAFT FINAL ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP) *Ghana*

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Rev. N.	Rev. Date	Content	Prep/Rev	Released	Signature
1	9/05/2024	312 ESA R SP 003 A DRAFT ESCP	Ghana Cons/SP	F. Terragni	
2	14/08/2024	312 ESA R SP 003 B DRAFT ESCP	Ghana Cons/SP	F. Terragni	
3	14/09/2024	312 ESA R SP 003 C DRAFT FINAL DRAFT ESCP	Ghana Cons/SP	F. Terragni	

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The West African Power Pool Secretariat - WAPP (the Recipient) is planning to implement assistance to support the operationalization of the ECOWAS Regional Electricity Market (the Project) with the involvement of all national electricity companies, members of WAPP and the Project Management Unit (PMU) under WAPP supervision, for which it has requested a Programmatic Project Preparation Advance (PPA), as set out in the PPA agreement. The International Development Association (hereinafter the Association) has agreed to provide the PPA to finance activities (the Activities) related to the preparation of the Project as set out in the referred agreement.
2. The Recipient shall ensure that the Activities are 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 and the ESCP is a part of the PPA agreement. Unless otherwise defined in this ESCP, capitalized terms used 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, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Once adopted, said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreement(s), the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Representative specified in the Agreement(s). The Recipient shall promptly disclose the updated ESCP.
5. This ESCP lays out important actions and measures that the Borrower must take or order taken. These include, but are not limited to, the actions and measures' timelines, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The Environmental and Social Policy (ESP) lays out the environmental and social (E&S) instruments

that will be adopted and implemented under the Project. These instruments must all be disclosed and subject to prior consultation in accordance with the ESS, both in terms of form and content, and in a way that is approved by the World Bank. The World Bank may, by prior written consent, periodically amend the aforementioned E&S instruments after they are adopted.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<b>ORGANIZATIONAL STRUCTURE</b> Establish and maintain a Project Management Unit (PMU) at GRIDCo in Ghana to support the management of the Project's EHSR risks and impacts at the local level, with at least one environmental specialist, one social specialist, and one person with knowledge of gender-based violence. The terms of reference for these positions and the necessary qualifications will be reviewed by the Association for non-objection. Additional consultants may be hired by the PIU during implementation as needed.	Within two months of the project's effective date, appoint an environmental specialist, a social worker, and an experienced person on gender-based violence, and keep these roles for the duration of the project's execution	PIU
B	<b>CAPACITY BUILDING PLAN/MEASURES</b> Prepare and implement the capacity building plan the following capacity building measures: <ul style="list-style-type: none"> <li>• Training of PIU staff, stakeholders, affected community members, Project workers and consultants on the following subjects:               <ul style="list-style-type: none"> <li>○ Good practices in complaint management and record keeping, including SEA/SH, GM</li> <li>○ E&amp;S documentation and reporting</li> <li>○ Good practices for the preparation of ESIA's and RAPs</li> </ul> </li> </ul>	Throughout the project implementation period.	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> <li>○ Disclosure of information</li> <li>○ Occupational Health and Safety</li> <li>○ Emergency preparedness and response</li> <li>○ Stakeholder Engagement</li> </ul> <ul style="list-style-type: none"> <li>• As the project is being implemented, the training plan will be modified to meet the demands. Maintaining the Project actors' capacities is the goal of this training strategy.</li> <li>• If the PMU is unable to conduct the training sessions itself, it will hire accredited consultants to conduct the training for PMU staff members, contractors, and other pertinent project stakeholders.</li> </ul>		
MONITORING AND REPORTING			
C	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the [Bank/Association] regular monitoring reports on the environmental, social, health and safety (E&amp;S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> <li>• Status of preparation and implementation of E&amp;S documents required under the ESCP.</li> <li>• Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan.</li> <li>• Complaints submitted to the grievance mechanism(s), the grievance log, and progress</li> </ul>	<p>Submit annual reports to the World Bank throughout Project implementation commencing after the Effective Date.</p> <p>Submit each report to the World Bank no later than 15 days after the end of each reporting period.</p>	<p>West African Power Pool Secretariat – WAPP; Project Implementation Unit</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>made in resolving them.</p> <ul style="list-style-type: none"> <li>E&amp;S performance of contractors and subcontractors as reported through [monthly] contractors' and supervision firms' reports.</li> <li>Number and status of resolution of incidents and accidents reported under action E below.</li> </ul>		
D	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>Provide monthly monitoring reports on ESHS performance to the World Bank from contractors and supervisory firms, following the metrics outlined in the corresponding contracts and bidding documents.</p>	Throughout the project's implementation, submit a monthly report to the World Bank.	PIU
E	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Any incident or accident related to the Project that has, or is likely to have, a significant negative impact on the environment, the affected communities, the general public, or workers must be reported to the World Bank right away. This includes, but is not limited to, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death or serious or multiple injuries.</p> <p>Give adequate information about the extent, gravity, and potential causes of the incident or accident.</p> <p>As necessary, the report should also include any information provided by any contractors or supervisory firms, as well as any immediate steps taken or planned to resolve the matter.</p>	<p>Notify the World Bank of the occurrence or mishap as soon as possible—no later than 48 hours.</p> <p>Provide review report and Corrective Action Plan to the [Bank/Association] no later than 10 days following the submission of the initial notice,</p>	PIU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>Prepare a report on the incident or accident and suggest any corrective actions to stop it from happening again at the World Bank's request.</p> <p>A standard incident/accident notification form must be sent by the Recipient to all suppliers and sub-contractors. This form is not applicable to SEA/SH incidents; in that case, any notification of an SEA/SH incident must adhere to the information sharing protocol in order to protect the survivor's safety and privacy. Information that must be shared includes the date the incident was reported, the type of SEA/SH reported, the survivor's age and gender, whether the incident is connected to a project, and whether the survivor was referred to the appropriate services.</p> <p>Arrangements would be made for an appropriate review of the incident or accident to establish its immediate, underlying and root causes.</p> <p>Prepare, agree with the World Bank, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>unless a different timeframe is agreed to in writing by the Association.</p>	



ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b></p> <p>1. Adopt and carry out the following plans: an Environmental and Social Commitment Plan (ESCP), a Local Workforce Management Plan (LWMP), a Stakeholder Mobilization Plan (SWMP), a Grievance Redress Mechanism (GRM), an Environmental and Social Impact Assessment (ESIA) that includes an Environmental and Social Management Plan (ESMP), a Resettlement Action Plan (RAP) for the activities of components 1 and 2 of the project, namely the construction of the Ghana-Côte d'Ivoire interconnection and the reinforcement of the country's electricity transmission network, as well as an Environmental and Social Management Framework (ESMF) and a Resettlement Policy Framework for the Electrification of Communities/Towns/Villages component in Ghana in compliance with the applicable ESS.</p> <p>2. An Environmental and Social Impact Assessment (ESIA) and accompanying Environmental and Social Management Plan (ESMP) should be prepared, updated, consulted, adopted, disclosed, and then put into action for investments intended to increase trade in electricity between Ghana and Côte d'Ivoire and to fully operationalize the regional electricity market in compliance with Environmental and Social Standards (ESS).</p> <p>3. The following procedures should be followed: create, update, consult, adopt, disclose, and then put into action an Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Resettlement Action Plan(s) (RAP), Workforce Management Plan (WMP), Stakeholder Engagement Plan (SEP), and a mechanism for handling complaints, including those pertaining to sexual harassment and exploitation.</p>	<p>1. Prepare the ESIA and ESMP before the beginning of any activity, and thereafter implement the ESIA and ESMP throughout Project implementation.</p> <p>2. Prepare the ESMF prior to the beginning ESIA, and thereafter implement the ESMF throughout Project implementation.</p> <p>3. Prepare the ESMP and incorporate the ESMP as part of the respective bidding documents for the respective project components that requires the preparation of such ESMP. Once finalized, implement the respective ESMP throughout Project</p>	PIU

	<p>4. A site-specific Environmental and Social Management Plan (ESMP) and Environmental Impact Assessment (ESIA) will be prepared by the Project Management Unit (PIU) following a review of any proposed activities in accordance with the ESMF accepted for the project.</p>	<p>implementation.</p> <p>4. No later than 90 days following the project's implementation, the Grievance Redress Mechanism (GRM) for the administration and processing of complaints pertaining to the SEA/SH must be created, revealed, discussed, and approved.</p>	
1.2	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Provide contractors and prime contractors with the EHSR specifications of the bidding documents that include pertinent elements of the ESCP, such as labor management protocols, environmental and social instruments, and a code of conduct. Next, confirm that these contractors abide by the ESHS requirements as stated in their individual contracts, as well as that their sub-contractors do the same.</p>	<p>Make sure that the code of conduct and environmental and social instruments, are reflected in the corresponding procurement documents and contracts.</p> <p>Throughout the project's implementation, put these safeguards into place and keep them there.</p> <p>Supervise contractors as the project is being implemented.</p>	PIU

1.3	<b>TECHNICAL ASSISTANCE</b> <p>Make sure that all studies, reports on the construction of the Ghana-Côte d'Ivoire interconnection, capacity building initiatives, trainings, and any other technical assistance activities under the Project, are carried out in compliance with the ESS and acceptable terms of reference approved by the governing authority.</p> <p>After that, confirm that the results of these tasks align with the terms of reference.</p> <p>Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	Throughout the course of the activity implementation, the technical assistance activities are conducted in accordance with the ESS.	PIU
1.4	<b>CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING</b> <p>Not Applicable to this project</p>		
1.5	<b>ASSOCIATED FACILITIES</b> <p>Not Applicable to this project</p>		
1.6	<b>USE OF [BORROWER/RECIPIENT'S] ENVIRONMENTAL AND SOCIAL FRAMEWORK</b> <p>Not Applicable to this project</p>		
1.7	<b>COMMON APPROACH</b> <p>Not Applicable to this project</p>		
1.8	<b>ACTIVITIES SUBJECT TO RETROACTIVE FINANCING</b> <p>Not Applicable to this project</p>		

ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>The Workforce Management Plan (WMP) for the project should be created, updated, consulted, adopted, disclosed, and put into action. It should include, among other things, guidelines for managing labour relations, safety and health in the workplace (including emergency preparedness and PPE), and working conditions.</p> <p>Create the code of conduct, which should cover forced labor, child labor, sexual exploitation and abuse, sexual harassment, and procedures for project workers to file claims. It should also include obligations for businesses, , companies, suppliers, sub-contractors, and the prime contractor.</p> <p>Adopt and implement the Labor Management Procedures (LMP) for the Project. This must cover a variety of topics, such as labour laws, worker relations, forced labour, child labour, grievance procedures for Project employees, code of conduct, occupational health and safety (including PPE and emergency preparedness and response), and applicable requirements for contractors, subcontractors, and supervising firms.</p>	Execute the measure management process, and then follow these guidelines throughout the project implementation period.	PIU
2.2	<p><b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</b></p> <p>a. Prepare and implement an OHS Management Plan to assess and manage the OHS risks and impacts of the Project.</p> <p>b. Require contractors and subcontractors to prepare and implement OHS</p>	Prepare the OHS Management Plan prior to the beginning of the project, and thereafter implement the plan throughout Project implementation.	PIU

	Management Measures or Plan [in accordance with] [name E&S document that informs the contractor's measures or plans].		
2.3	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b>  Provide a Complaint Management Mechanism that is operationalized and established for Project Workers in compliance with ESS #2 and the Workforce Management Procedures.	Establish the Grievance Redress Mechanism prior to the recruitment of workers for the Project and maintain and operate it throughout the Project implementation.	PIU

ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p><b>WASTE MANAGEMENT PLAN</b></p> <p>Create and execute a Waste Management Plan (WMP) in accordance with ESS3 to handle both hazardous and non-hazardous wastes; and in compliance with the Environmental and Social Standard (ESS#3). The Recipient will guarantee that the Project's contracting companies create and execute a hazardous and non-hazardous waste management plan at each of the project site's facilities.</p>	<p>This plan needs to be created before construction begins and kept up to date as the project is carried out.].</p>	PIU
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>The Recipient shall guarantee that all sources of pollution (liquid, solid, and gaseous) are identified, assessed, and that suitable, targeted mitigation measures are created and put into action as part of the environmental and social assessment of each sub-project.</p> <p>As part of ESMPs, the Recipient is required to guarantee that ESMF will offer help on the creation of hazardous and nonhazardous waste management plans.</p>	<p>Both prior to the commencement of the project and throughout its execution.</p>	PIU

<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>TRAFFIC AND ROAD SAFETY</b> As required in the ESIA/ESMP to be produced under the three (3) project components, adopt and implement risk management strategies for traffic and road safety.	When policies are approved and ESIA/EMP is put into action.	PIU
4.2	<b>COMMUNITY HEALTH AND SAFETY</b> Assess and manage the particular risks and effects that the project's activities may have on the community, such as the potential for a labor inflow, the spread of COVID19, HIV, Hepatitis B, and security threats. Include mitigation strategies in the ESIAs that will be created in compliance with the ESMF.	Upon adoption of measures and implementation of ESIA/EMP	PIU
4.3	<b>SEA AND SH RISKS</b> Prepare, maintain, discuss, publish, and put into action a Grievance Redress Mechanism (GRM) in order to evaluate and control risks, particularly those associated with SEA and SH. When implementing the project, adopt and use the PMM.	Submit the GRM for prior review by the WAPP and obtain no objection adoption and disclosure the plan 90 days after project inception and prior to preparation of procurement documents. Once adopted, implement the plan throughout project implementation.	PIU
4.4	<b>SECURITY MANAGEMENT</b>		

	Not Applicable to this project		
4.5	<b>DAM SAFETY (FOR ANNEX A ESS4)</b> Not Applicable to this project		



ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p><b>RESETTLEMENT FRAMEWORK PLANS</b></p> <p>1. Prepare and implement a Resettlement Policy Framework (RPF) and Process Framework (PF) for the Project, consistent with ESS5. In accordance with ESS5, create, revise, consult, adopt, disclose, and put into action a resettlement policy framework (RPF) for the project.</p> <p>2. Resettlement Action Plans (RAPs) must be prepared, updated, consulted, adopted, disclosed, and put into action for each project activity for which the RPC requests one, in compliance with ESS5.</p>	<p>1. Prior to the project appraisal, the RPF must be created, reviewed, approved, and made public. It must also be followed throughout the project's execution.</p> <p>2. Submit the relevant RAP to the World Bank for consideration before approval and disclosure, and if approved, carry with the plan, including paying compensation and offering assistance before assuming ownership of the land and any associated assets.</p>	<p>PIU</p> <p>PIU</p>

ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b>  Make sure that ESIA's: (i) evaluate possible effects on ecosystems and biodiversity; (ii) incorporate risk and impact management strategies and activities in ESMPs that comply with the mitigation hierarchy and ESS6; and (iii) carry out these strategies in a way that satisfies the World Bank.	Before beginning any actions, prepare, update, consult, adopt, and disclose Biodiversity Management Plan. Then, implement ESMPs throughout the project's implementation.	PIU

ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	<b>INDIGENOUS PEOPLES [FRAMEWORK] [PLAN] or [PLANS]</b> Not Applicable to this project		

ESS 8: CULTURAL HERITAGE			
8.1	<b>CULTURAL HERITAGE RISKS AND IMPACTS</b>  Adopt and implement a Cultural Heritage Management Plan (CHMP) [indicate if it is a component of another document, such as the ESMF; ESMP, in compliance with the Project's ESIA criteria, and in line with ESS8.	Implement the Archaeological and Cultural Heritage Cultural Heritage Management Plan throughout project implementation, including incidental findings procedures.	PIU
8.2	<b>CHANCE FINDS</b>  Explain the chance finding processes and put them into practice. [Name the document that outlines these procedures, such as the Project's ESMF; ESMP.	Incidental finding procedures outlined in the ESIA and ESMP, implemented through the project period.	PIU

ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
9.1	<b>ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)</b> Not Applicable to this project		

ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN</b></p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) in accordance with ESS10 for the Project. This plan should include steps to, among other things, give stakeholders access to timely, relevant, and understandable information and to consult with them in a way that is culturally appropriate and free from discrimination, coercion, manipulation, intimidation, and other negative behaviours.</p>	<p>Prior to project evaluation, prepare, revise, consult, adopt, disclose, and then implement the PMPP. Continue to do so during the project's implementation.</p>	PIU
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>Establish, announce, uphold, and run an easily accessible grievance process to accept and assist in resolving concerns and grievances pertaining to the Project, in a timely and efficient manner, in a transparent manner that is culturally appropriate and easily accessible to all parties affected by the Project, at no cost and without retaliation, including concerns and grievances filed in an anonymous manner in accordance 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>Within 30 days of the project's start date, submit a Complaint Management Mechanism (CMM) for approval to the World Bank. Create the complaint management system no later than 60 days following the date of installation, and continue to maintain and run it for the duration of the project.</p>	PIU

## INDICATORS FOR IMPLEMENTATION READINESS

The indicators will be identified as relevant to monitor project readiness from an E&S standpoint.

These will include actions related to: i) establishment of E&S risk management units in the Project Implementation Entities, ii) recruitment and training of E&S staff within Project Implementation Entities, iii) Memorandums of Understanding or other written agreements/arrangements between Project Implementation Entities and other concerned agencies to ensure proper coordination of E&S risk management activities; iv) E&S effectiveness or disbursement conditions, if deemed warranted, v) E&S assessments and plans carried out during the implementation; vi) other project-specific requirements related to E&S readiness for implementation.