



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 12/21/2020 | Report No: ESRSC01775



BASIC INFORMATION

A. Basic Project Data

| | | | |
|--------------------------|---|--------------------------|----------------------------|
| Country | Region | Project ID | Parent Project ID (if any) |
| Ghana | AFRICA WEST | P175588 | |
| Project Name | Ghana Productive Safety Net Project 2 | | |
| Practice Area (Lead) | Financing Instrument | Estimated Appraisal Date | Estimated Board Date |
| Social Protection & Jobs | Investment Project Financing | 1/25/2021 | 3/30/2021 |
| Borrower(s) | Implementing Agency(ies) | | |
| Republic of Ghana | Ministry of Gender Children and Social Protection, Ministry of Local Government and Rural Development (MLGRD) | | |

Proposed Development Objective

To support the Government to expand and enhance social safety nets that improve the incomes and productivity of the poor

| Financing (in USD Million) | Amount |
|----------------------------|---------------|
| Total Project Cost | 100.00 |

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

Ghana, like most countries globally, was adversely affected by the COVID-19 pandemic which led to a partial lockdown in April 2020 and Government intervening with various health and social interventions to support individuals to cope with the health and economic impact of COVID-19. As a result, Ghana’s projected GDP growth for 2020 was revised from 6.8 percent to 0.9 percent. The World Bank has supported Government to strengthen its social protection system since 2010. During the height of the COVID-19 pandemic, the Ghana Productive Safety Net Project



(GPSNP - P164603) supported the delivery of additional cash transfers to both LEAP beneficiaries and other poor and vulnerable individuals using existing systems and processes.

In response to these dire effects, particularly to the poor and vulnerable and based on lessons from the emergence of COVID-19, this new project is proposed to undertake more significant social protection actions to further promote relief and recovery for poor, vulnerable, and hard-hit populations, with an increased focus of support to the urban poor. The main focus areas will be (i) expansion of LEAP cash transfers program; (ii) scale up of productive inclusion activities; (iii) scale up of labor-intensive public works; (iv) consolidate systems strengthening activities and linkages to social services; and (v) facilitate the uptake and sustained participation of formal and informal employers and workers in social insurance programs that offer old-age, survivor, and disability benefits. Providing greater flexibility, the proposed new project will also include a contingency component – CERC – to allow for additional financing arising from any future large-scale, negative shocks.

This project will support the Government to provide tailored support to the poorest households to address the demand-side constraints to accessing services that would strengthen their productivity. This support will be sequenced in a manner that reflects (i) the different capabilities of and constraints faced by households; and (ii) the geographic coverage of each intervention. For those extremely poor households that can diversify their incomes or improve the productivity of their household enterprises but face constraints in accessing technical skills and financial support, a set of productive inclusion activities will be provided. This will be situated within broader efforts to provide dedicated and coordinated support to help households access agricultural support and strengthen their financial literacy and savings. These investments in the productivity of the household will be directed to LEAP and LIPW beneficiaries given that these programs reach extremely poor households. In parallel, the LIPW component will offer regular seasonal employment opportunities for extremely poor households. These public works activities will be carried-out in a manner that addresses the underlying causes of poverty in these areas, namely improving soil erosion, access to markets (through feeder roads), access to irrigation and access to household water, sanitation and hygiene facilities (WASH) . It is anticipated that these assets will directly contribute towards improved agricultural productivity in these areas and assist poor households respond to the risks of climate change.

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The project will be implemented across the country in poorest communities, districts and municipalities in both rural and urban areas. The climate of Ghana is tropical with the eastern coastal belt been warm and comparatively dry. The south-western corner is hot and humid while the north of Ghana is hot and dry. There are six agro-ecological zones in Ghana made up of the Sudan Savannah, Guinea Savannah, Coastal Savannah, Forest/Savannah transitional zone, Deciduous Forest zone and the Rain Forest zone. The total annual rainfall ranges from 780 mm in the dry eastern coastal savannah belt to 2,200 mm in the wet southwest rain forest of the country.

The topography consists mainly of low plain at the coast with elevations that range from sea level to the highest peak of 885 m on Mount Afadjato as part of the Akwapim-Togo Ranges and punctuated with several uplands and a major plateau in the south-central part of the country.



The Labor-Intensive Public Works (LIPW) program will take place in extremely poor districts of Ghana. These extremely poor households are mostly located in Guinea and Sudan savannah agro-ecological zones. These areas are highly degraded and vulnerable to further degradation and desertification due to increasing aridity. The soils are generally very low in fertility and productivity and the area is more susceptible to greater climatic variability.

The project will strengthen the national safety net delivery system and therefore, indirectly benefit all households captured in the GNHR as potential beneficiaries of social protection programs. Further, the project will support ongoing government efforts to provide tailored support to the poorest households across the country to address the demand-side constraints to accessing services and support that would strengthen their productivity and resilience. The geographical coverage per region, district and community will be based on the Ghana Living Standards Survey six (GLSS-6) poverty map and GNHR data. The support to the LEAP program will be implemented nationwide to provide regular cash transfers to extremely poor households. The LEAP program is currently operating in every region and districts of the country and thus will continue to be the foundational support by the Government to reach extremely poor households.

The Labour Intensive Public Works (LIPW) component will be implemented in both rural and urban areas across the country to offer regular seasonal employment opportunities for extremely poor households in poor communities. These public works activities will be carried-out in poor communities to increase resilience and protect the livelihoods of beneficiaries. The project will directly benefit the poorest households in all administrative regions of Ghana and about 45,000 individuals are expected to benefit directly through a productive inclusion program; 45,000 beneficiaries through a labor-intensive public works program; and 400,000 households through the cash transfer program.

D. 2. Borrower's Institutional Capacity

The Ministry of Gender, Children and Social Protection (MoGCSP) and the Ministry of Local Government and Rural Development (MLGRD) are the lead implementing agencies (LIAs) with fiduciary roles and will be responsible for preparing work plans and budgets for the implementation of project activities. The Ghana National Household Registry (GNHR), the Social Protection Directorate (SPD), LEAP Management Secretariat (LMS), the Rural Development Coordination Unit (RDCU) of the MLGRD and district assemblies (DAs) will have leading roles in implementing different components of the project.

The LIAs and most of the other implementing agencies (e.g., LMS, SPD, RDCU and DAs) have prior experience in implementing Bank funded projects with satisfactory performance in operationalizing the Bank's Safeguard Policies. Despite this experience, the expanded scope of the Environmental Social Framework (ESF) requires targeted training, monitoring and technical assistance to support the effective implementation of the project. However, the LIAs are already implementing the GH- Productive Safety Net Project (P164603) and have implemented the Ghana Social Opportunities Project (GSOP-P115247) in the past with satisfactory safeguards compliance.

The Environmental and Social Safeguard Specialist, Gender Officer and Environment and Social focal persons currently implementing the GH- Productive Safety Net Project (GPSNP, P164603) will provide E&S support for risk identification, management and reporting. The Environmental and Social Safeguard Specialist is the lead at the RDCU for public work activities and ably supported by the Zonal Safeguards and Case management Officer with assistance from the Zonal Safeguards team made up of the Deputy Zonal Coordinator and Zonal Procurement Officer. At the District level, the District Planning Officer is the lead safeguards focal person and supported by the District Engineer, MIS and Accounts. At the community level, the Community facilitator is the lead safeguards focal person.



II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate

The Environmental Risk Rating is moderate. The environmental risks and impacts expected from the LIPW subprojects, such as rehabilitation and maintenance of small earth dams and dugouts, rehabilitation and maintenance of rural feeder and access roads, provision of community plantations as part of the climatic change initiatives and provision of water, household toilets and community solid waste collection services will present low to moderate environment risks. The potential risks and impacts are, however, specific and may include erosion, siltation, flooding, dust generation, road safety hazards, waterborne diseases, and health and safety issues. These expected risks and impacts are envisaged to be low to medium in magnitude, temporary, site-specific and easy to manage.

Social Risk Rating

Moderate

The Social Risk Rating is moderate. This classification is based on the potential social risks and impacts and the capacity of the implementing agencies to manage the risks and impacts. The project builds on experiences and lessons from the ongoing GPSNP (P164603) and successor project GSOP (P115247) and seeks to improve productivity, social inclusion, expanding income earning opportunities to poor households, and providing relief to extremely poor households due to the COVID-19 pandemic.

While the project activities are expected to have positive social impacts, some social risks are envisaged. Project activities under component 1 and 3 (e.g., start-up cash grants and cash transfers) could lead to exclusion of vulnerable people and elite capture if selection processes are not transparent. Further, activities proposed under component 2 (e.g., rehabilitation and maintenance of rural feeder and access roads, rehabilitation of small earth dams, dugouts, and provision of WASH facilities; establishment of fruit tree and woodlot plantations) will require temporary or permanent land acquisition. The activities may lead to economic displacement and livelihoods losses for landowners and users, migrant farmers or women among others. Road safety concerns are also anticipated in project communities due to the proposed feeder road rehabilitation works. Sexual Exploitation and Abuse and Sexual Harassment, drowning, flooding and exposure to water borne diseases and other communicable diseases including COVID-19 are anticipated due to activities proposed under component 2. ESS 5 on Land Acquisition, Restrict on Land Use and Involuntary Resettlement will apply to provide guidance on appropriate mitigation measures. The impact of the project activities on SEA/SH will be further assessed during preparation to inform the design of the project. COVID-19 prevention protocols will be included in the ESMF, SEP and Labour Management Procedures to be prepared prior to appraisal.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:



At the current project preparatory stage, the exact locations of sub-projects have not been decided. Also, the scope and scale of sub-project activities are not clearly defined at this stage. Based on the component description in the Project Concept Note, the anticipated environmental, health and safety risks and impacts of the proposed investments with respect to rehabilitation and maintenance of rural feeder and access roads include erosion, siltation, flooding, surface and ground water contamination, dust generation and road safety hazards with negative implications for health and safety of workers and community members.

The risks and impacts associated with the rehabilitation of small earth dams and dugouts include generation and disposal of spoils from the excavation works and removal of silt, excavation and transportation of burrow earth, burrow pit management, health and safety of workers and community members. The risks and impacts associated with the climate change mitigation interventions, which involves the cultivation of fruit trees and tree crops and may require the use agro-chemicals. The risks and impacts may include erosion and dust generation from the land clearing activities, flooding and management of agro-chemical. The avoidance of flood prone areas, adoption of smart agricultural practices and implementation of integrated pest management will minimize the expected impacts.

The project under the rural and urban sanitation component will support the segregation of waste at source, invest in appropriate disposal mechanism and aid the communities to identify and secure sites with appropriate approvals from the Environment Health Directorate of the District Assemblies.

The scope and scale of the anticipated risks and impacts are expected to be site-specific, limited, localized, temporary and largely reversible.

The activities to be financed by the project are expected to have moderate social risks and impacts. The proposed project activities are small-scale; and intended to provide reliefs, improve social cohesion and ensure inclusion as well as support sustainable livelihoods. However, proposed activities that may generate social risks include the proposed rehabilitation and maintenance of rural feeder and access roads and small earth dams and dugouts; and provision of cash grants and cash transfers to extremely poor households. Social risks and impacts envisaged include project ability to manage local labour issues and localized economic displacement arising from land use; addressing community health and safety, ensuring social inclusion; and putting in place robust framework for addressing grievances and SEA/SH; ensuring citizens engagement; social inclusion and preventing elite capture of project interventions.

The project will therefore undertake adequate consultations, prepare and disclose an Environmental and Social Management Framework (ESMF), and a Resettlement Policy Framework (RPF) to guide subsequent development of suitable safeguard instruments. Labor Management Procedure (LMP) and CERC requirements will be included in the ESMF. The project will also prepare a Stakeholder Engagement Plan (SEP) including Grievance Redress Mechanism to address project related complaints. Once sub-projects' specific locations are clearly identified, the project will undertake screening to identify potential environmental and social risks and impacts and develop specific instruments e.g., Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP), and a Resettlement Action Plan (RAP) as required to mitigate the identified risks and impacts.

Areas where “Use of Borrower Framework” is being considered:

The project will not rely on Borrower’s framework for environmental and social management



ESS10 Stakeholder Engagement and Information Disclosure

The project pulls together implementing agencies at the local, regional and national levels, private sector actors and variety of beneficiaries. This makes ESS10 very relevant to the project. A stakeholder engagement plan (SEP) will be prepared to identify broader issues affecting specific stakeholders so as to avoid the social risks and impacts while enhancing the positive social impact of the project. A SEP will identify and include initiatives to ensure the involvement of local women and men, community-based organizations, community leaders, people with disabilities and farmers. Consultation mechanisms work best when they are aligned with existing institutional infrastructure and cultural systems and are accessible to project-affected persons. The Project related initiatives and mechanisms will take into account and mainstream existing institutional infrastructure and cultural systems that are supportive to project development objectives and improved social performance. The SEP will include COVID-10 considerations in all the stakeholder consultation activities.

The project would mainstream social accountability into its implementation processes to ensure efficiency and beneficiary satisfaction with service delivery; promote transparency and accountability; encourage participation and citizen engagement; assist in reducing leakages; promote community management and ownership; and provide voice to the LIPW Beneficiaries who in most cases are voiceless. Social accountability measures would include, but are not limited to: sensitization exercises; community forums; installation of Transparency and Accountability Boards (TABs) at sub-project sites that would ensure the disclosure of critical project information; and the establishment and operation of “Hotlines” at the local regional and national for purposes of timely redress of grievances.

The project will build on the existing grievance redress mechanisms under the ongoing Ghana Productive Safety Net Project (P164603) established at the community, district, regional, and national levels to address project related complaints.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The standard is considered relevant to this project. It is anticipated that the project may make use of direct workers, contracted workers and community workers. Activities under Component 2: Labor Intensive Public Works (LIPW); such as the rehabilitation and maintenance of rural feeder and access roads, small earth dams and dugouts, climate change mitigation interventions, and construction of rural and urban water and sanitation facilities; is anticipated to engage community workers. Engagement of direct workers and contracted workers are envisaged to be on a very small scale. The subproject activities may expose workers to some degree of occupational health and safety (OHS) risks. The risks could include injuries; snake bites and animal attacks; agrochemical contamination and poisoning; manual handling with its associated injuries; noise, dust and fumes inhalation etc. The project anticipates to employ about 1700 community workers for public works across beneficiary communities. The number of direct workers and contract workers to be engaged cannot be estimated at this current stage. However, no large-scale labor influx is anticipated as contract workers are expected to be from the local communities.



The project will ensure workers hired are provided appropriate labour and working conditions in line with local laws and consistent with ESS2.

The Borrower will ensure and emphasize non-discrimination and equal opportunity in the recruitment process, and recognition of workers' rights of association including provision for grievance mechanism for all project workers. As part of the labor management, the Borrower will require contractors and service providers to prepare and implement stand-alone labor management plan, which will, among others, provide full list of workers in gender-disaggregated format and child labor prevention awareness. The labour management plan will also cover Occupational Health and Safety (OHS) related issues and COVID-19 prevention strategies. Borrower will require contractors to establish workers grievance mechanism proportionate to the nature and scale of the project to enable all direct workers and contracted workers to raise workplace concerns and to receive timely resolution and feedback to complaints.

Supervision of the LIPW sites; capacity building for small-scale contractors, Municipalities and District Assemblies (MDAs) and other actors in LIPW delivery; and information sessions to beneficiaries on human capital will be key part of labour management. The project will also support on-the-job training for small-scale contractors and practical training at model sites for all category of persons who will be involved in the construction and supervision of works.

ESS3 Resource Efficiency and Pollution Prevention and Management

Land Preparation and Soil Erosion: Climate change interventions (e.g. afforestation and cultivation of fruit trees) will involve land clearing which may cause soil erosion and water pollution when best practice is not applied. The small-scale nature of the works coupled with selective land clearing will minimize the impact on the environment. As part of the implementation plans, workers will be guided on selective land clearing with minimal impact on erosion. The project will support the quantification of GHG emissions especially for the climate change mitigation interventions.

Integrated Pest Management (IPM): To improve yields under the climate change mitigation interventions and where necessary minimal amount of pesticides will be used for which the project will prepare and implement an Integrated Pest Management Plan (IPMP) for all beneficiary communities. The IPMP will be concise, practical, tailored to the project's needs and include relevant short training modules for the workers and the affected communities on the handling of pesticides and the product application equipment, health risks of mishandling pesticides, safe disposal of empty containers and the dangers of using the empty containers for household needs especially for storing drinking water. The IPMP will be annexed to the ESMF.

Dust Generation: Rehabilitation and maintenance works on the feeder road and small earth dams will generate dust in the immediate environment. The relatively short-term and small-scale nature of the earth works coupled with the application of good practices will minimize any excessive dust generation and prevent long-term nuisance in the environment.

Solid Waste Management: Collection and disposal of solid waste in the community will involve the selection of the approved disposal sites in consultation with the regulatory authorities, adoption of the appropriate segregation approaches and disposal to minimize impact on the environment in accordance with the tenets of the project ESMF.



The World Bank Group EHS guidelines will be incorporated in the ESMF to provide guidance for health and safety issues on the project.

ESS4 Community Health and Safety

ESS4 is relevant to the proposed project because the community is the center of the project activities. In particular, the complementary Livelihood and Asset Support Scheme (CLASS), facilitating linkages to existing agriculture projects for improved the agricultural productivity of extremely poor households and the LIPW are community-centered activities. These activities will generate enormous benefits to extremely poor households and the communities as a whole, and will include economic benefits like increased earnings from LIPW and cash transfers; skills development; financial inclusion and women empowerment. There are also potential risks and impacts such as community health and safety (road safety, traffic management and exposure to construction-related hazards, SEA/SH, drowning, flooding, exposure to water borne diseases) and social conflicts. This is particularly relevant in the era of COVID-19 pandemic. The project will prepare an ESMF prior to appraisal which will include measures to mitigate these risks. The ESMF will include a screening tool that will help in identifying site specific risks and impacts on the affected communities and establish preventive and control measures as part of the project ESMPs.

The project is rehabilitating small earth dams and dugout with an average height of 5 meters and not more than 10 meters from the lowest foundation to the crest, which are community based and may have community health and safety implications such as drowning, flooding and exposure to water borne diseases in the community for which the project will prepare and implement an operational and maintenance plan including an emergency preparedness plan. The plan will include but not limited to the continuous community engagement and sensitization on the potential hazards of the assets, provision of adequate signage around the area to prohibit bathing in those small dams and indicating the depth visually as victims are often alone on site and underestimate the depth of the water (in this case 5-10 meters).

The project will apply meaningful consultation and an elaborate sensitization program to ensure that beneficiary communities for each sub-project are engaged on the project, its objectives, implementation arrangements, delivery mechanisms and social risk and impacts management approaches. Community engagement would be a continuous activity to ensure that community concerns are addressed and proper maintenance of the facilities.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The project activities will not require acquisition of new lands but will involve the use of existing lands for the rehabilitation and maintenance of existing infrastructure and climate change activities. However, the project is expected to finance the following activities under component 2 (rehabilitation and maintenance of rural feeder and access roads and small earth dams and dugouts, climate change mitigation interventions including cultivation of fruit trees and cash crops and woodlots on degraded communal and public land and construction of rural and urban sanitation facilities. These are envisaged to be small scale, community focused and will take place largely in existing footprints using local labor. There is however the potential loss of property and livelihood from the rehabilitation, maintenance and climate change works. During preparation, discussions will be held with the Borrower to prepare



and disclose a resettlement policy framework (RPF) prior to appraisal to guide the preparation of Resettlement Actions Plans and Abbreviated Resettlement Action Plans as required during implementation when subproject locations are identified.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Climate change interventions and rehabilitation of small earth dams and dugouts will involve some level of land clearing depending on the type of land selected, which may lead to the loss of biodiversity. The loss of biodiversity on the project is, however, expected to be minimal. This will further be studied during the preparation of the ESMF for the project.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

Not relevant

ESS8 Cultural Heritage

The rehabilitation work is not expected to affect cultural heritage. However, this standard is still relevant because the rehabilitation and maintenance work may involve earth works and could lead to the discovery or identification of certain cultural heritage, including archaeological relics, graves, shrines, sacred trees or groves that may require attention of relevant government agencies. A Chance Finds Procedure will be elaborated in the ESMF and ESIA/ESMPs for the subprojects.

ESS9 Financial Intermediaries

Not relevant

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

None

Public Disclosure



B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:

- Preparation, consultation and disclosure of ESMF and Resettlement Policy Framework (RPF)
- Preparation and disclosure of Stakeholder Engagement Plan (SEP)
- Preparation of Environmental and Social Commitment Plan (ESCP)
- Preparation of Labour Management Procedures (LMP)
- Preparation of an Integrated Pest Management Plan (IPMP)

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

- Implementation of SEP and Grievance Redress Mechanism (GRM)
- Preparation and implementation of ESIA/ESMP
- Preparation and implementation of Resettlement Action Plan (RAP)/ ARAP

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

31-Dec-2020

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Republic of Ghana

Implementing Agency(ies)

Implementing Agency: Ministry of Gender Children and Social Protection

Implementing Agency: Ministry of Local Government and Rural Development (MLGRD)

V. FOR MORE INFORMATION CONTACT

Public Disclosure



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VI. APPROVAL

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|-------------------------------|--|
| Task Team Leader(s): | Dhushyanth Raju, Christabel Ewuradjoa Dadzie |
| Practice Manager (ENR/Social) | Senait Nigiru Assefa Recommended on 17-Dec-2020 at 11:51:55 GMT-05:00 |
| Safeguards Advisor ESSA | Nathalie S. Munzberg (SAESSA) Cleared on 21-Dec-2020 at 17:32:27 GMT-05:00 |