



GOVERNMENT OF GHANA

JOBS AND SKILLS PROJECT (P166996)

**ENVIRONMENTAL AND SOCIAL MANAGEMENT
FRAMEWORK
(ESMF)**

JUNE, 2019

GOVERNMENT OF GHANA

JOBS AND SKILLS PROJECT (JSP)

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

FINAL REPORT

JUNE, 2019

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EXECUTIVE SUMMARY

Project Description

The Jobs and Skills Project (JSP) is being prepared at the request of Government of Ghana. The Project

Development Objective is to support the government of Ghana on skills development and job creation in the country. The project will have a national coverage and will comprise multiple

activities that promote the employment and productivity of workers, as well as initiatives to strengthen the efficiency and capacity of government agencies for the various activities to be implemented under the project. The project comprises of four components for skills development and job generation:

- (a) Component 1: Provision of Apprenticeship Training for Jobs;
- (b) Component 2: Provision of Entrepreneurship and Small and Micro Enterprise Support for Jobs;
- (c) Component 3: Operationalization of the Ghana LMIS, Upgradation of District Public Employment Centers and Services, and Independent Reviews of Government Youth Employment and Skills Development Program; and
- (d) Component 4: Capacity Development, Technical Assistance, and Project Management Support for Enhanced Skills and Jobs Impact

The primary target groups for the project are:

- (a) Individuals seeking skills and jobs
- (b) Master craft persons
- (c) Cooperatives and associations
- (d) Private enterprises and their workforces
- (e) Public and private training providers
- (f) Council for Technical and Vocational Education and Training (COTVET); Ministry of Employment and Labor Relations (MELR); Ministry of Environment, Science, Technology, and Innovation (MESTI); and National Board for Small Scale Industries (NBSSI).

The implementation structure will comprise Project Steering Committee (PSC), Lead Agency (PCU - MoF), Implementing Agencies (MoE/COTVET, MoTI/NBSSI, MELR and MESTI) and a Technical Committee as well as Collaborating Agencies, given the multi-sectoral nature of the project.

The Jobs and Skills Project, according to World Bank's Environmental Assessment Policy (OP 4.01), is Category B. The preparation of an Environmental and Social Management Framework (ESMF) for the project is necessitated because the specific sub-project activities and locations are yet to be determined. Activities that trigger potential environmental and social risks and impacts comprise (i) provision of competitive business start-up capital grants to individuals that receive entrepreneurship training under subcomponent 2.1; (ii) provision of competitive grants to private enterprises under sub-component 2.2; (iii) installation of information and communication technology for the Ghana Labor Market Information System at Public Employment Centers, other relevant local centers, and relevant ministries and agencies under project component 3.1, and (iv) Upgradation of selected Public Employment Centers under sub-component

3.2. The objective of the ESMF is to establish a process of environmental and social screening that will assess the environmental and social issues of the project. This will permit the institutions in charge of implementation of the project to identify, assess and mitigate the environmental and social impacts of project-funded activities. The ESMF also determines the institutional measures to be taken during the project implementation, including those relating to capacity building.

Project Implementing Arrangements

The implementation structure will comprise Project Steering Committee (PSC), Coordinating Agency, Implementing Agencies and a Technical Committee as well as Collaborating Agencies, given the multisectoral nature of the project. The E&S Specialist at COTVET will have overall safeguards responsibility for project activities undertaken by COTVET, NBSSI and MESTI and report directly to the PCU. The other implementing agencies (NBSSI and MESTI) will however include Safeguards Focal Persons (SFPs) in the Project Implementation Teams (PITs) who will report to the E&S Specialist at COTVET. The E&S Specialist at MELR will have overall safeguards responsibility for project activities undertaken by the Ministry and report directly to the PCU.

Baseline Conditions of Project Area

Ghana is situated on the west coast of Africa and lies within longitudes 3°5'W and 1° 10'E and latitudes

4°35'N and 11°N, with a total area of 238 540 km². It shares borders with Côte d'Ivoire to the west, Burkina Faso to the north, Togo to the east and the Gulf of Guinea To the south. The country was divided into 10 administrative regions until December 27, 2018 when the number of regions was increased to 16¹. Currently there are 254 Metropolitan, Municipal and District Assemblies (Target Units).

Ghana's population as at 2010 stood at 24,658,823, comprising 12,024,845 (48.8%) males and 12,633,978

(51.2%) females, culminating into a sex ratio of 95.2. Currently, the county's population is estimated at 30,000,000. Of population aged 15 years and older, 71.1 percent are economically active and of these, most are employed (94.7%) (Ghana Statistical Service, 2012). Increasing population numbers, with large proportions in the youthful population implies economic burden/dependency on the available working group (15-64 years). The Project would therefore impact positively on the nation as it would provide jobs and employable skills to the potential workforce to lessen the economic burden.

According to Ghana Statistical Service (2016), total unemployment rate in Ghana is 11.9 percent; the rate is higher among females (12.5%) than males (11.1%). Unemployment is also much higher in urban areas (13.4%) than in rural areas (10.2%). There are marked differences in the unemployment rates recorded in the regions, with Upper East (18.4%)

¹ Reference will however be made to the ten regions of Ghana which has consistent relevant data.

recording the highest unemployment rate and Brong Ahafo (6.8%) recording the lowest. The female unemployment rate is higher than that for males in all regions except Greater Accra, 13.3% for females and 15.6% for males and Brong Ahafo (6.8% for females and 10.1% for males) where the reverse is the case. The JSP therefore intends to use a combination of strategies, with multiple implementing agencies to tackle this unemployment as well as underemployment issue as described under section 1.2.

Environmental and Social Impacts, Issues and Risks

The potential environmental and social risks and impacts associated with the specific project component activities are listed below.

1. Provision of apprenticeship and entrepreneurship and small and micro enterprise support to individuals and private enterprises for jobs under components 1 and 2	
<i>a. Environmental</i>	
<i>Impacts/Issues/Risks</i>	<i>Possible Sources</i>
Waste generation and management	<ul style="list-style-type: none"> • By products of business activities • Poor sanitary conditions at workplace • Possible use of grants for construction activities to expand business premises
Air Pollution	<ul style="list-style-type: none"> • Use of machinery at some business premises • Possible use of grants for construction activities to expand business premises • Burning of waste materials
Noise and Vibration	<ul style="list-style-type: none"> • Use of workplace machinery • Possible use of grants for construction activities to expand business premises
Social	
Skills development	<ul style="list-style-type: none"> □ Entrepreneurial Training of MCPs, workers and apprentices
Improved capacity and skills of Training Providers and Training Coordinators	<ul style="list-style-type: none"> • Resource allocation to Training Institutions • Training and equipment supply to Training Coordinators
Decent jobs for individuals and private enterprises	<ul style="list-style-type: none"> □ Possibility of business expansions
Occupational, Safety and Health (OSH) Issues	<ul style="list-style-type: none"> • Lack of access and poor use of protective clothes • No proper water and sanitation practices at workplaces • Fire prevention and Control

Opportunity for women, the disabled and all vulnerable	<input type="checkbox"/> Priority and opportunity to be given to vulnerable groups in society.
Greater Coordination and Synergy within Trade Associations	<input type="checkbox"/> Use of Trade Associations as an important stakeholder in the training of MCPs and Apprentices
Gender Based Violence	<input type="checkbox"/> Mixed gender at workplaces
Discrimination based on gender	<input type="checkbox"/> Mixed gender at workplaces
Disagreement and Conflicts	<input type="checkbox"/> Interaction at workplace

2. Upgradation of selected Public Employment Centers under project Component 3

a. Environmental

<i>Impacts/Issues/Risks</i>	<i>Possible Sources</i>
Creation of burrow pits leading to soil and land degradation	<input type="checkbox"/> Sourcing of earth materials
Vegetation losses, soil disturbance and Erosion	<input type="checkbox"/> Sourcing of earth materials
Air quality	<ul style="list-style-type: none"> • Rehabilitation works • Transport of construction materials and waste • Exhaust emissions for equipment including heavy duty trucks • Burning of construction waste
Vibration and Noise	<ul style="list-style-type: none"> • Site demolition activities • Rehabilitation works • Noise from equipment
Generation and disposal of solid waste	<ul style="list-style-type: none"> • Construction/rehabilitation works • Office waste

b. Social

Relocation of staff and office equipment of PECs	<input type="checkbox"/> Rehabilitation and refurbishment activities
Occupational, Health and Safety risks	<ul style="list-style-type: none"> • Non-use of PPEs by construction workers • Absence of first aid treatment and potable water for construction workers
Employment to Contractors and construction workers	<input type="checkbox"/> Rehabilitation and refurbishment activities
Improved resource centre for employment.	<input type="checkbox"/> Rehabilitation and refurbishment activities

Lack of meaningful consultation/citizens engagement	<input type="checkbox"/> Rehabilitation and refurbishment activities
Possibility of dissent and complains	<input type="checkbox"/> Rehabilitation and refurbishment activities

Policy, Legal and Administrative Frameworks

The policy, legislation and institutional procedures of Ghana and those of the World Bank, which are relevant to the Ghana Jobs and Skills Project and therefore considered include:

- Ghana’s Environmental Policy;
- The Environmental Protection Agency Act of 1994 (Act 490);
- The Environmental Assessment Regulations (LI 1652);
- The Fees and Charges Amendment Instrument of 2015, LI 2228;
- Ghana EIA procedures; and
- The World Bank’s safeguard policies which include guidance on EA requirements - Environmental Assessment (OP4.01) and the World Bank Group Environmental, Health and Safety Guidelines.

Other National and Sector Policy Frameworks and Legislations were also considered; The 1992

Constitution of the Republic of Ghana; Local Governance Act of 2016, Act 936; National Labour, Safety and Health Requirements, Ghana Shared Development and Growth Agenda II (2014 - 2017), National Employment Policy, among others.

In case there is a disparity between the National EPA Regulations and the World Bank Policies the more stringent standard would apply.

Framework Environmental and Social Management Plan

Potential Risks and Impacts	Possible Sources	Risks Mitigation Measures
1. Provision of apprenticeship and entrepreneurship and small and micro enterprise support to individuals and private enterprises for jobs under components 1 and 2		
Waste generation and management	<ul style="list-style-type: none"> • By products of business activities • Poor sanitary conditions at workplace • Possible use of grants for construction activities to expand business premises 	<ul style="list-style-type: none"> • Waste segregation and reuse of waste as first option • Provide bins at workplace for storage of garbage (encourage sorting of waste) • All metal scrap waste will be disposed of at sites approved by the MMDAs or sold to approve third party agents for use by metal companies. • Excavated earth materials will, as much as possible, be re-used for back filling purposes • Regular cleaning and maintenance of drainage systems, sumps and oil interceptors • Use of oil trays for waste oil collection and reuse of waste oil for other activities
Air Pollution	<ul style="list-style-type: none"> • Use of machinery at some business premises • Possible use of grants for construction activities to expand business • Burning of waste materials 	<ul style="list-style-type: none"> • Work equipment and machinery to be regularly maintained and serviced to reduce emission when in use. • Engines of vehicles, equipment and machinery to be turned off when not in use. • Prohibition of open burning of waste
Noise and Vibration	<ul style="list-style-type: none"> • Use of workplace machinery • Possible use of grants for construction activities to expand business premises 	<ul style="list-style-type: none"> • Work equipment and machinery to be regularly maintained and serviced to reduce noise generation when in use. • Engines of vehicles, equipment and machinery to be turned off when not in use. • Residents and other commercial activities to be notified in advance of noisy machinery before use

Occupational, Safety and Health (OSH) Issues	<ul style="list-style-type: none"> • Lack of access and poor use of protective clothes • No proper water and sanitation practices at workplaces • Fire prevention and Control 	<ul style="list-style-type: none"> • All workers should be given proper induction/orientation on safety. • Regularly service all equipment and machinery to ensure they are in good working condition. • Ensure there are first aid kits on site and a trained person to administer first aid. • Provide and enforce the use of appropriate personal protective
		<p>equipment (PPE)</p> <ul style="list-style-type: none"> □ Apply sanctions where safety procedures are not adhered to. □ Work places to be mandated to have fire extinguishers □ Proper information notification and orientation on safety at workplaces □ Conservation of electricity should be a priority at workplaces
Gender Based Violence	□ Mixed gender at workplaces	<ul style="list-style-type: none"> □ Education and sensitization on gender-based violence and rights of women at trainings. □ Training Service Providers and sub-contractors required to sign a code of conduct □ Support survivors to access relevant services (if required)
Discrimination based on gender	□ Mixed gender at workplaces	<ul style="list-style-type: none"> □ guarantee equal rights to both sexes at workplaces as per the constitution of Ghana □ Ensuring that females enjoy their maximum maternity rights

2. Upgradation of selected Public Employment Centers under project Component 3		
Creation of burrow pits leading to soil and land degradation	<ul style="list-style-type: none"> □ Sourcing of earth materials 	<ul style="list-style-type: none"> □ Sourcing of materials from approved sites □ Concurrent reclamation and backfilling □ Replanting of trees that have been removed □ Avoidance of sensitive vegetation for earth materials
Vegetation losses, soil disturbance and Erosion	<ul style="list-style-type: none"> □ Sourcing of earth materials 	<ul style="list-style-type: none"> □ Replanting of trees that have been removed □ Avoidance of sensitive vegetation for earth materials
Air quality	<ul style="list-style-type: none"> • Rehabilitation works • Transport of construction materials and waste • Exhaust emissions for equipment including heavy duty trucks • Burning of construction waste 	<ul style="list-style-type: none"> □ Soil/s and cement loads in transit to be well covered to reduce dust levels rising above acceptable levels. □ Stockpiles of exposed soil and unpaved access roads to be sprinkled with water to regulate dust levels. □ Use of good quality fuel and lubricants in vehicles, equipment and machinery. □ Ensure that heaped sand delivered for construction works is covered with tarpaulin to prevent wind and water transport of soil
		<p>particles</p> <ul style="list-style-type: none"> □ Engines of vehicles, machinery, and other equipment to be switched off when not in use. □ Regular scheduled maintenance and servicing to be carried out on all vehicles and equipment to minimize exhaust emissions. □ Construction and civil works to be phased out or controlled to reduce emissions from equipment and machinery

Vibration and Noise	<ul style="list-style-type: none"> □ Site demolition activities □ Rehabilitation works □ Noise from equipment 	<ul style="list-style-type: none"> □ Construction noise will be limited to restricted times agreed to in the permit □ During operations the engine covers of generators, air compressors and other powered mechanical equipment shall be closed, and equipment placed as far away from residential areas as possible □ Construction equipment and machinery to be regularly maintained and serviced to reduce noise generation when in use. □ Engines of vehicles, equipment and machinery to be turned off when not in use. □ Earthworks and other construction/rehabilitation activities to be phased out or controlled to reduce noise generation during construction. □ Neighboring residents and commercial activities to be notified in advance of the project before contractor mobilizes to site
Generation and disposal of solid waste	<ul style="list-style-type: none"> □ Construction/rehabilitation works □ Office waste 	<ul style="list-style-type: none"> □ Excavated earth materials will, as much as possible, be re-used for back filling purposes to reduce waste □ Excavated solid waste from the drain channel that are unsuitable for backfilling will be collected onsite, allowed to drain and collected for disposal at sites approved sites in collaboration by the MMDAs. □ Ensure that the required amounts of construction materials are delivered to site to reduce the possibility of the occurrence of excess material □ Provide bins on site for temporary storage of garbage such as lubricant containers, drinking water sachets and carrier bags/packaging materials. □ All metal scrap waste will be disposed of at sites approved by the

		MMDAs or sold to approve third party agents for use by metal companies.
Relocation of staff and office equipment of PECs	<ul style="list-style-type: none"> □ Rehabilitation and refurbishment activities 	<ul style="list-style-type: none"> □ Provide alternative office space for staff and office equipment.
Occupational, health and safety risks	<ul style="list-style-type: none"> □ Non-use of PPEs by construction workers □ Absence of first aid treatment and potable water for construction workers 	<ul style="list-style-type: none"> □ Engage experienced artisans for construction works. □ All workers should be given proper induction/orientation on safety. □ The contractors will have a Health & Safety Policy and procedures to guide the construction activities. □ Regularly service all equipment and machinery to ensure they are in good working condition. □ Ensure there are first aid kits on site and a trained person to administer first aid. □ Provide and enforce the use of appropriate personal protective equipment (PPE) such as safety boots, reflective jackets, hard hats, hand gloves, earplugs, nose masks, etc. □ Proof of competence for all equipment/machine operators will be required and established through inspection of valid drivers or operator"s license or documents. □ Comply with all site rules and regulations. □ Apply sanctions where safety procedures are not adhered to. □ Site meetings should create awareness on OHS.
Potential for exclusion from consultation	<ul style="list-style-type: none"> □ Rehabilitation and refurbishment activities 	<ul style="list-style-type: none"> □ Conduct stakeholder identification and mapping □ Effective consultation with stakeholders including feedback throughout the project cycle.

The Environmental and Social Screening and Management Process

The Safeguards Specialist(s) on the project must foremost carry out the preliminary environmental and social screening of proposed projects by using the checklist suggested in **Appendix D** in close consultation with the respective Safeguards Focal Persons - PIUs/MMDAs. If significant impacts are anticipated, then the EPA must be consulted and the Ghana Environmental Assessment (EA) procedures duly followed. When there are minimal or no impacts (as determined using the checklist), Safeguards Specialist(s) would proceed with the minimum regular reporting requirements. The table below shows details of the screening and management process and responsibilities.

Step	Steps/Activities	Responsible	Collaboration	Service Provider
1.	Identification and/or siting of the sub-project	MELR - PIU COTVET-PIU	<ul style="list-style-type: none"> • PCU • MELR-E&SS • COTVET- E&SS • NBSSI & MESTI-SFPs • FP - Regional Labour Department □ FP - MMDA 	-
2.	Environmental and Social screening of proposed project intervention to assist in project formulation using E&S checklist.	<ul style="list-style-type: none"> • MELR-E&SS • COTVET-E&SS 	<ul style="list-style-type: none"> • PCU • NBSSI & MESTI-SFPs • FP - Regional Labour Department □ FP - MMDA 	-
3.	Screening, categorization and identification of the required instrument (use the national EIA procedure)	<ul style="list-style-type: none"> • MELR-E&SS • COTVET-E&SS 	<ul style="list-style-type: none"> • PCU • MELR – PIU • FP - Regional Labour Department • FP - MMDA 	EPA
4.	Approval of the classification and the selected instrument by EPA & WB	<ul style="list-style-type: none"> • MELR-E&SS • COTVET-E&SS 	□ NBSSI & MESTI-SFPs	EPA WB
5.	Preparation of the safeguard document/instrument (ESIA, ESMP, RAP/ARAP,			and safeguards Sa

Audit.) in accordance with the national legislation/procedure (taking the risk policy into account requirements).			
Preparation and approval of the ToRs	MELR-E&SS COTVET- E&SS	<ul style="list-style-type: none"> • Procurement Specialist – PCU • FP - Regional Labour Department • FP - MMDA 	WB (for approval purposes only)
Preparation of the report			External Consultant
Report validation and issuance of the permit (when required)		<input type="checkbox"/> Procurement Specialist – PCU FP - Regional Labour	EPA WB

			Department <input type="checkbox"/> FP - MMDA	
	Disclosure of the document		<ul style="list-style-type: none"> • MELR-E&SS • COTVET- E&SS 	Media Websites of various institutions WB
6.	(i) Integrating the construction phase mitigation measures and E&S clauses in the bidding document prior advertisement; (ii) Ensuring that the constructor prepares an ESMP (C-ESMP), gets it approved and integrates the relevant measures in the works breakdown structure (WBS) or execution plan.	Technical staff in charge of the subproject (TS-PCU)	<ul style="list-style-type: none"> • MELR-E&SS • COTVET, NBSSI & MESTI-SFPs - E&SS 	Control Supervisor
7.	Implementation of the other safeguards measures, including environmental monitoring (when relevant) and sensitization activities	<ul style="list-style-type: none"> • MELR-E&SS • COTVET- E&SS 	<input type="checkbox"/> FP - Regional Labour Department <input type="checkbox"/> FP - MMDA	Consultant NGOs CSOs

8.	Oversight of safe implementation (internal) guards	<ul style="list-style-type: none"> • MELR-E&SS • COTVET-E&SS 	<ul style="list-style-type: none"> • Monitoring and Evaluation Specialist (M&E-PCU) • NBSS & MESTI - SFPs • FP - Regional Labour Department □ • FP - MMDA 	Supervising Firm
	Reporting on project and safeguards performance disclosure	<ul style="list-style-type: none"> • MELR-E&SS • COTVET-E&SS 	□ M&E-PCU	MoF WB
	External oversight of the project safeguards compliance/performance	EPA	<ul style="list-style-type: none"> • MELR-E&SS • COTVET- E&SS • M&E-PCU 	-
9.	Building stakeholders' capacity in safeguards management.	<ul style="list-style-type: none"> □ MELR-E&SS □ COTVET-E&SS 	□ Procurement Specialist - PCU	□ EPA
10.	Independent evaluation of the safeguards performance (Audit)	<ul style="list-style-type: none"> □ MELR-E&SS □ COTVET-E&SS 	□ Procurement Specialist - PCU	□ Consultant

Institutional Capacity for the Implementation of the Framework ESMP

MDAs in charge of project implementation were assessed based on their operational structure, budgetary resources and inventory, relevant skills and experience, adaptive management, stakeholder engagement, grievance redress and disclosure of information.

Aside the EPA, which had a positive result in all indicators assessed, the rest mostly had negative results

(Appendix C). The Ministry of Education also had positive response for almost all indicators due to previous World Bank projects (Ghana Skills and Technology Development Project-GSTDP) implemented by the

Ministry of Education, which had Safeguards Specialists, as well as existing education projects (Secondary Education Improvement Project-SEIP). The other IAs barely had any experience in handling environmental and social risks, hence the need for capacity building.

Capacity building would include training workshops and production of guidance reports and tools, with the following recommendation.

Training content	Participants
<ul style="list-style-type: none"> • World Bank Safeguard policies of OP 4.12 and OP 4.01; • World Bank Group EHS Guidelines • Ghana EPA Environmental Assessment Regulations • ESMF/ RPF • Stakeholder Engagement Techniques and Procedures • Screening Checklist • Preparation of Terms of Reference for ESIA and RAPs • Completion of EA Registration Forms • Environmental and Social Management Plans • Grievance redress registration and resolution forms • Adherence to Decent Work • Emergency Response Preparedness • Gender and Gender Based Violence 	PCU – MoF PIU – MELR PIU – MoE (COTVET and Skills Development Fund) PIU – MESTI PIU – MoTI (NBSSI) RCC Focal Persons MMDA Focal Persons Training Service Providers Contractors Supervising engineers Contractors/Service Providers/Supervising Engineers.

Openness and Transparency

Openness is the key to effective and inclusive development. It is the idea that citizens and governments can work together to achieve better results for all. Under this Project, openness and transparency would be achieved through the following mechanisms; Rigorous Information, Education and Communication System, Citizen Participation in Decision Making, Adopting Paperless Systems, and Access to a Robust Complaints System.

Grievance Redress Mechanism

From the institutional arrangements, the Project would have a Project Coordinating Unit (MoF) and Project Implementation Units (MoE/COTVET, MoTI/NBSSI, MELR and MESTI). The proposed grievance redress mechanism would have a *central online system housed at the MELR PIU that links up and is accessible to the PCU at MoF and to all the PIUs.*

The Project grievance redress committee would be made up of all the E&S specialists and PIU Safeguards focal persons to resolve all grievances on the project. Each PIU would have a dedicated staff that records cases pertaining to the unit, either manually or electronically and feeds it onto the central system. The management and resolution of grievances which would be the primarily the responsibility of each PIU will automatically be communicated through the online system with the other members of the grievance redress committee as well as the PCU. Unresolved cases at the PIUs would then be the

responsibility of the grievance redress committee. Escalated cases beyond the Project and Inter Ministerial Project Steering Committee level would be handled by the Ghana Judicial System.

The proposed GRM recommends four key steps as follows:

- Receive and register grievances or complaints;
- Acknowledge, assess and assign (Acknowledge receipt of grievance, outline how grievance will be processed, assess eligibility and assign responsibility)
- Propose Response
- Agreement on Response
- If agreement is reached, implement agreement
 - If agreement is not reached, review case and
 - If no agreement is reached under the review process, then the case can be referred to the law courts.

Grievance management and resolutions would be reported through monthly reports by the E&S Safeguards Specialists at MELR and COTVET to the Project Coordinator to inform management decisions. Quarterly reports would also be generated and reported to the MoF as part of the Project's Progress Reporting as well as the World Bank. Periodic reports would also be generated for stakeholders upon request irrespective of the period (e.g bi-annual, annual etc.)

Environmental and Social Monitoring

The monitoring issues at the ESMF level include confirmation of the dissemination of the ESMF as well as capacity building and training activities. At the activity level, this will encompass instituting monitoring actions to, for example, confirm the screening of projects, preparation of the ESIA reports, acquisition of environmental permits etc. The table below shows the monitoring and evaluation plan.

No	Monitoring level	Monitoring Issue	Means of Verification	Responsibility
1.	ESMF level	Adequate dissemination of ESMF to stakeholders	Record of consultations and meetings Workshop reports Media Advertisement	PCU Consultant
		Capacity building and training programs	Training reports	PCU, EPA Consultants
2.	Sub- project activity level	Screening of sub project	Checklist completed	Safeguards Specialist
		Completion of EA1 form	Completed EA1 Form submitted to the EPA	Safeguards Specialist

	Adequate mitigation measures provided to manage adverse impacts	ESIAs, ESMPs prepared	Safeguards Specialist, EPA
	Project satisfies statutory provisions EPA Act 1994 (Act 490) LI 1652	EPA Permit for sub – project (s)	Safeguards Specialist, EPA
	Post project monitoring and evaluation	Monitoring reports, annual environmental reports	PCU, EPA

Estimated Budget for ESMF Implementation

The implementation of the ESMF would have budget implications in terms of awareness creation, capacity improvement and training workshops as well as dissemination of ESMF to key stakeholders involved in the implementation of proposed interventions. The budget is estimated at UDS 205,000. Refer to Table 10 for the detailed estimated budget for ESMF implementation.

Public Consultations

Public consultations were also held with key representative stakeholders at the national and local levels.

The national consultations involved meeting key representatives of Ministry of Finance (MoF), Ministry of Employment and Labour Relations (MELR), Ministry of Education- Council for Technical and Vocational Education Training (COTVET) and Ghana TVET Voucher Program, Ministry of Trade and Industry (MoTI) – National Board for Small Scale Industries, and the Ministry of Science, Technology and Innovation.

The local consultations included field visits to the Public Employment Centre (PEC) at Tema Metropolis and focus group discussions with Training Coordinators and Master Crafts Persons of Association of Garages and Ghana Cooperative Fashion Designers Association (GCFDA), both under the Ghana TVET Voucher Project in Greater Accra Region.

Public Communication and Consultation Mechanism/Plan

The EPA and World Bank policies require that environmental reports/ESIA documents for projects are made available to project affected groups, local NGOs and CSOs, and the public at large. Following clearance from the World Bank, the Government of Ghana would disclose the framework through print media advertisements and copies made available in selected public places. The advertisement would provide:

- a brief description of the Project;
- a list of venues where the ESMF report is on display and available for viewing;
- duration of the display period; and
- contact information for comments

The ESMF would finally be disclosed in the national dailies and on the websites of the PCU and PIUs as well as the World Bank's Info Shop.

ACRONYMS

BACs	Business Advisory Centres
COTVET	Council for Technical and Vocational Education and Training
ESMF	Environment and Social Management Framework
GCAP	Ghana Commercial Agriculture Project
GCFDA	Ghana Cooperative Fashion Designers Association
GLMIS	Ghana Labour Market Information System
GRM	Grievance Redress Mechanism
GSDI	Ghana Skills Development Initiative
GTVP	Ghana TVET Voucher Project
ETP	Economic Transformation Project
IA	Implementation Agency
JSP	Jobs and Skills Project
LA	Lead Agency

MCP	Master Craft Person
MELR	Ministry of Employment and Labor Relations
MESTI	Ministry of Environment, Science, Technology, and Innovation
MoF	Ministry of Finance.
MoU	Memorandum of Understanding
MSEs	Medium to Small Enterprises
NBSSI	National Board for Small Scale Industries
OSH	Occupational, Safety and Health
PECs	Public Employment Centres
PIT	Project Implementation Teams
PSC	Project Steering Committee
PPEs	Personal Protective Equipments
PWDs	People with Disabilities
SDF	Skills Development Fund
TCs	Training Coordinators
TDP	Tourism Development Project
TP	Training Provider
VMS	Voucher Management System
WAATP	West Africa Agriculture Transformation Project

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1.0 PROJECT DESCRIPTION

1.1 Project Background

The Jobs and Skills Project (JSP) is being prepared at the request of Government of Ghana. The Project

Development Objective is to support the government of Ghana on skills development and job creation in the country. The project will have a national coverage and will comprise multiple activities that promote the employment and productivity of workers, as well as initiatives to strengthen the efficiency and capacity of government agencies for the various activities to be implemented under the project.

The project is one element of broader Bank support toward promoting employment and productivity in

Ghana. The broader support includes the Economic Transformation Project (ETP), the Tourism Development Project (TDP), the Ghana Commercial Agriculture Project (GCAP) Additional Financing, and the West Africa Agriculture Transformation Project (WAATP). In particular, JSP will complement the expected contents of ETP. Facilitating the process toward this aim, both projects are being coordinated by the Ministry of Finance (MoF).

The project seeks to promote improved employment opportunities and outcomes. Ghana's economy has been on a high growth path for most of the past two decades. However, the Ghanaian economy has created less productive, remunerative employment than would be predicted by its economic growth. Poor work- and working-conditions in employment is also a concern. The composition of employment opportunities and outcomes also systematically differs by geography and gender, among other dimensions.

The need to design and implement measures to improve employment opportunities and outcomes is seen as pressing by the government and other stakeholders. Existing policies and plans with this aim of promoting employment include the Coordinated Program of Economic and Social Development Policies 2017-2024, the National Employment Policy 2014, and the five-year strategic plan to transform Technical and Vocational Education and Training.

1.2 Project Components

The project comprises of four components for skills development and job generation:

(a)Component 1: Provision of Apprenticeship Training for Jobs;

(b)Component 2: Provision of Entrepreneurship and Small and Micro Enterprise Support for Jobs;

(c)Component 3: Operationalization of the Ghana LMIS, Upgradation of District Public Employment Centers and Services, and Independent Reviews of Government Youth Employment and Skills Development Program; and

(d)Component 4: Capacity Development, Technical Assistance, and Project Management Support for Enhanced Skills and Jobs Impact

Component 1: Provision of Apprenticeship Training for Jobs.

The main implementing agency for this component will be the Council for Technical and Vocational Education and Training.

This component aims to offer a more formalized, standardized apprenticeship system, through the inclusion of formal training providers into apprenticeship training delivery and underpinned by a sound quality assurance system and integrated more into the government's Technical and Vocational Education and Training strategy and system.

The component will support apprenticeship training to individuals. Apprenticeship training will combine workplace-based training offered by a master craft person and classroom-based training offered by a training institute (referred to as a training provider). Individuals will be selected for apprenticeship training based on standardized criteria, which are relevant, transparent, and objective. Apprentices will seek at least a certificate of competency, up to a maximum of five levels. The highest level of competency (level five) is equivalent to the Higher National Diploma. Most individuals are expected to complete up to two levels of competency, which can take between 9 to 12 months.

To raise the quality of apprenticeship training, the project will support the: (a) training of master craft persons who provide training under this component, to help ensure that their own skills are upgraded and that they can deliver training to their apprentices; (b) registration of public and private training providers and progress toward accreditation and the provision of competency-based training, in line with the country's National Technical and Vocational Education and Training Qualification (TVETQF) Framework; and (c) capacity development of accrediting bodies to effectively perform their role in accrediting training providers.

Component 2: Provision of Entrepreneurship and Small and Micro Enterprise (SME) Support for Jobs.

Sub-Component 2.1: Provision of entrepreneurship training and competitive business start-up grants. The National Board for Small Scale Industries (NBSSI) is the main implementing agency for this subcomponent and the Ministry of Environment, Science, Technology, and Innovation (MESTI) is a partnering agency.

Entrepreneurship training: Three levels of entrepreneurship training will be offered: basic, intermediate, and advanced. The training will be based on standardized, quality-assured modules. All participants will be expected to successfully participate in and complete basic training, while a share of those who complete basic training are expected to successfully participate in and complete intermediate training. All recipients of business start-up capital grants are expected to successfully participate in and complete advanced training. All training will be district based and non-residential. All advanced training participants will receive mentorship support. They will also receive guidance to prepare business plans, meet business registration and licensing requirements, and connect with input and output markets.

Competitive business start-up grants: Those who complete intermediate training will be eligible for competitive business start-up grants. These grants will be available to individuals or small, self-formed groups. Selection for the grant will (i) require the preparation of a business proposal and other requirements, with the aim of screening for motivated, promising applicants and (ii) be based on standardized criteria which are relevant, transparent, and objective. Grant size can vary based on a transparent, standardized formula, with absolute caps. Grants can be used for working capital and for licensing fees. A portion of the grant will also be assigned for the purchase of needed tools, equipment, energy-efficient, climate-smart technologies from certified suppliers, managed by NBSSI (the provision of technology-related goods and services will be supported by MESTI). Grant recipients will receive intensive mentorship and be subject to intensive monitoring.

Sub-component 2.2: Provision of Competitive Grants to Private Enterprises for Expanded Employment.

The main implementing agency for this sub-component is the Council for Technical and Vocational Education Training. The main partnering agencies are the Ministry of Environment, Science, Technology, and Innovation and the National Board for Small Scale Industries.

Micro and small enterprises (or self-formed groups of enterprises) irrespective of their formality status will be eligible for competitive grants (new enterprises will not be eligible, and the fund will stipulate a minimum age). The grant value will be capped at a specified absolute value or a specified percentage of the total cost of the proposal submitted by the enterprise, whichever is lower. The contribution of the grantee to the total cost in the proposal can be in-kind (such as through technological inputs).

Using their grants, in accordance with their proposals, enterprises can procure training services from formal public or private training providers and science, technology, and innovation (STI) services from public or private STI service providers. In addition, up to specified percentage of the grant, enterprises can purchase training materials, tools, and energy-efficient, climate-smart equipment or STI inputs.

While calls for applications will be open to application from all types of existing micro and small enterprises, enterprises in sectors with high-employment-growth potential and enterprises with strong female profiles will receive higher scores in the assessment. Outreach will be extended and intensified to solicit applications from preferred enterprise types and enterprises from more economically weaker regions and districts.

Component 3: Operationalization of the Ghana Labor Market Information System, Upgradation of District Public Employment Centers and Services, and Independent Performance Reviews of Government Youth Employment and Skills Development Program.

The Ministry of Employment and Labor Relations will be the implementing agency for this component.

Sub-component 3.1: Full development and operationalization of the Ghana Labor Market Information System. Under this sub-component, the project will fund the full development, operationalization, and maintenance of the Ghana Labor Market Information System.

Sub-component 3.2: Upgradation of district Public Employment Centers and provision of improved job connection and labor market information services to job seekers and employers. Under this subcomponent, the project will fund (i) the physical refurbishment of selected Public Employment Centers and (ii) the capacity development of staff in centers selected for refurbishment so that the staff can better provide job connection services to job seekers and employers.

Sub-component 3.3: Independent performance reviews of, and technical assistance for reforming, selected government youth employment and skills development programs. Under this sub-component, MELR will procure services to conduct the reviews of selected programs and subsequently procure goods and services for technical assistance for reforming reviewed programs. The aim of the reviews is to recommend reforms of the programs to enhance their impact on skills and jobs.

Component 4: Capacity Development, Technical Assistance, and Project Management Support for Enhanced Skills and Jobs Impact.

Coordinating, implementing, and partnering agencies will have responsibility for the procurement of their respective goods, works, and services under this component.

Sub-component 4.1: Capacity development and technical assistance. Under this sub-component, the project will support the capacity development of, and technical assistance to, coordinating, implementing, and partnering agencies for ensuring satisfactory implementation progress in, and performance of, project activities. Specifically, the project will support technical, advisory, and capacity building support for fiduciary; social and environmental management; administrative and operational; monitoring and evaluation; and information, communication and engagement activities. Project funds will be made

available for the procurement of goods and services for these activities performed by the coordinating, implementing, and partnering ministries and agencies.

Sub-component 4.2: Project management support. Under this sub-component, the project will support operating costs for project management support.

1.3 Project Scope and Beneficiaries

The project is intended to be national and the primary target groups for the project are:

- (g) Individuals seeking skills and jobs
- (h) Master craft persons
- (i) Cooperatives and associations
- (j) Private enterprises and their workforces
- (k) Public and private training providers
- (l) Council for Technical and Vocational Education and Training (COTVET); Ministry of Employment and Labor Relations (MELR); Ministry of Environment, Science, Technology, and Innovation (MESTI); and National Board for Small Scale Industries (NBSSI).

1.4 Institutional and Implementation Arrangements

27. The overall institutional arrangements for coordinating, overseeing, and managing project activities comprise (i) a Project Inter-Ministerial Oversight Committee, (ii) a Project Coordinating Unit, (iii) a Project Technical Committee, and (iv) implementing and partnering agencies.

- a) *Project Inter-ministerial Oversight Committee:* The primary function of the committee would be to review project status, progress, and performance, to help ensure inter-ministry and inter-agency cooperation, and to resolve any outstanding project implementation issues. Members of the committee would comprise of the Ministers of Education; Employment and Labor Relations; Environment, Science, Technology, and Innovation; Finance; and Trade and Industry.
- b) *Project Coordinating Unit:* The primary functions of the unit will be to (i) convene and support oversight committee meetings; (ii) prepare consolidated project status, progress, and performance reports for the oversight committee and the Bank; (iii) coordinate across implementing and partnering ministries and agencies; and (iv) undertake due diligence and ensure quality assurance of, and accountability for,

project implementation, including of financial management, procurement, and safeguards. The coordinating unit will be managed by the Ministry of Finance.

- c) *Project Technical Committee*: This committee will be composed of officials from all implementing and partnering agencies, the Council for Technical, Vocational Education and Training (COTVET), the Ministry of Employment and Labor Relations (MELR), the Ministry of Environment, Science, Technology, and Innovation (MESTI), and the National Board for Small Scale Industries (NBSSI). The main function of this committee will be to supervise and advise on technical aspects of project implementation.
- d) *Project implementing and partnering agencies*: The main implementing agencies are COTVET, NBSSI, and MELR. The main partnering agency is MESTI. Implementing agencies will be primarily responsible for implementation of project activities that fall under their respective purviews, comprising all elements including financial management, procurement, safeguards, monitoring and evaluation, capacity development and technical assistance, and research and analysis.
- e) *Safeguards implementation arrangement*: An environment and social safeguard specialist at COTVET will have overall safeguards responsibility for project activities undertaken by COTVET, NBSSI, and MESTI. An environmental and social safeguard specialist at MELR will have overall safeguards responsibility for project activities undertaken by the ministry. NBSSI and MESTI will have safeguard focal persons.

Figure 1 is the organogram of the institutional arrangements, whilst Table 1 summarizes the implementation arrangements

Figure 1: Institutional Arrangements

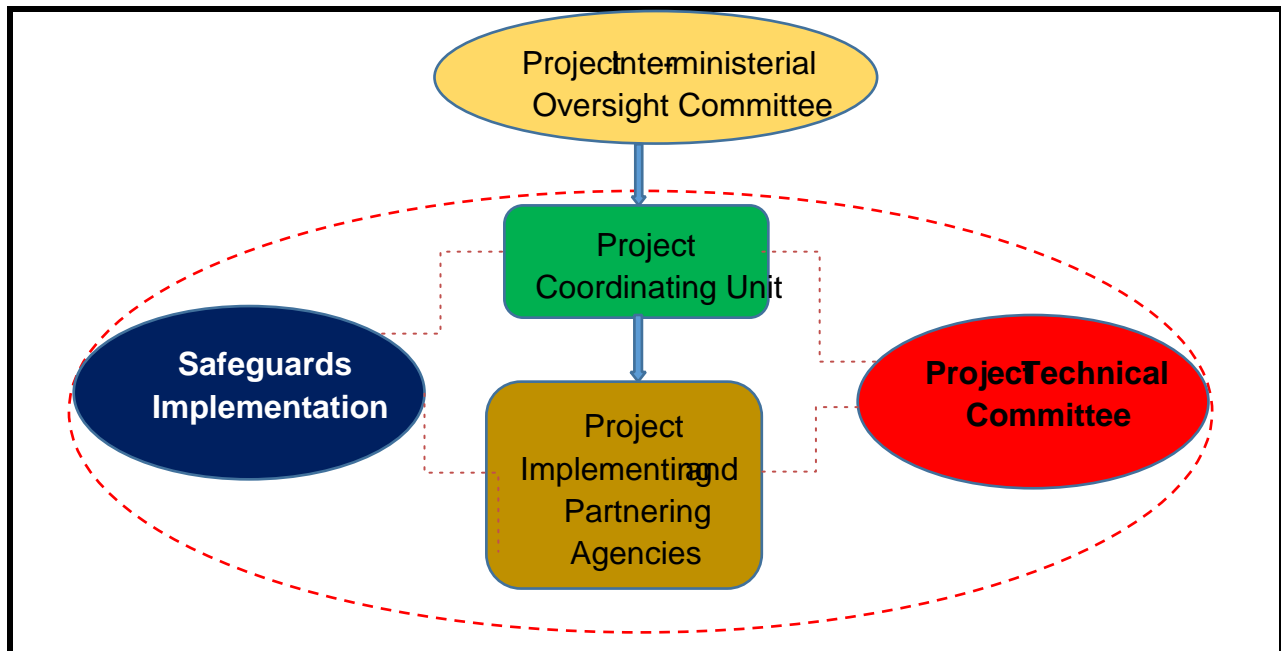


Table 1: Summary of Implementation Arrangements

Component	Subcomponent	Implementing Agency	Partnering Agency
1. Provision of Apprenticeship Training for Jobs		MoE (COTVET)	Private Sector
2. Provision of Entrepreneurship and Small and Micro Enterprise (SME) Support for Jobs	Sub-component 2.1: Provision of entrepreneurship training and competitive business start-up grants	MoTI (NBSSI)	MESTI
	Provision of Competitive Grants to Private Enterprises for Expanded Employment	MoE (COTVET)	MESTI NBSSI
3. Operationalization of the Ghana Labor Market Information	Full development and operationalization of the Ghana Labor Market Information System.	MELR	-

System, Upgradation of District Public Employment Centers and Services, and Independent Performance Reviews of Government Youth Employment and Skills Development Program.	Upgradation of district Public Employment Centers and provision of improved job connection and labor market information services to job seekers and employers.		
	Independent performance reviews of, and technical assistance for reforming, selected government youth employment and skills development programs.		
4. Capacity Development, Technical Assistance, and Project Management Support for Enhanced Skills and Jobs Impact	Capacity development and technical assistance	MoF	All Implementing and Partnering Institutions
	Project management support.		

1.5 Purpose, Objectives and Principles of the ESMF

World Bank Environmental Assessment Policy (OP 4.01) is triggered to deal with any environmental and social risks and impacts. The Jobs and Skills Project is Category B and will require the preparation of an Environmental and Social Management Framework (ESMF). Activities that trigger potential environmental and social risks and impacts comprise (i) provision of competitive business start-up capital grants to individuals that receive entrepreneurship training under sub-component 2.1; (ii) provision of competitive grants to private enterprises under sub-component 2.2; (iii) installation of information and communication technology for the Ghana Labor Market Information System at Public Employment Centers, other relevant local centers, and relevant ministries and agencies under project component 3.1, and (iv) Upgradation of selected Public Employment Centers under sub-component 3.2.

The objective of the ESMF is to establish a process of environmental and social screening that will assess the environmental and social issues of the project. This will permit the institutions in charge of implementation of the project to identify, assess and mitigate the environmental and social impacts of project-funded activities. The ESMF also determines the institutional measures to be taken during the project implementation, including those relating to capacity building.

The ESMF will be prepared according to the following specific objectives and principles:

- To establish clear procedures and methodologies for the environmental and social planning, review, approval and implementation of subprojects to be financed under the project;
- To specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social concerns related to subprojects;
- To determine the training, capacity building and technical assistance needed to successfully implement the provisions of the ESMF;
- To establish the project funding required to implement the ESMF requirements; and □ To provide practical information resources for implementing the ESMF.

The principles will include that the project;

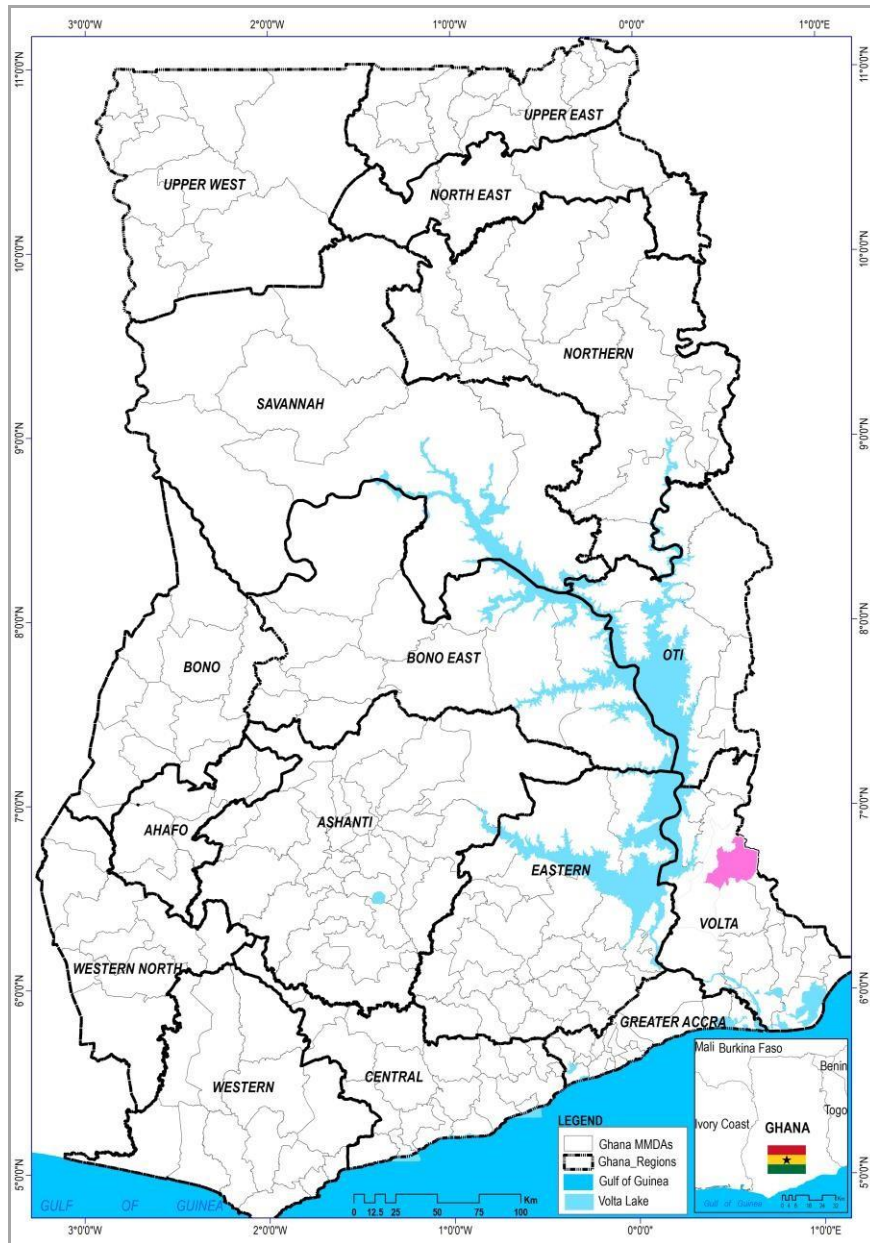
- Supports project implementers to develop their subprojects applications to avoid or minimize environmental and social safeguards concerns;
- Supports local authorities to review applications and determine if additional, more detailed environmental or social planning is required before applications can be approved;
- Supports project implementers and local authorities in carrying out their respective roles by funding substantial training, information resources and technical assistance; and
- Funds annual reviews for assessing compliance, learning lessons, and improving future performance, as well as assessing the occurrence of, and potential for, cumulative impacts due to project-funded and other development activities.

2.0 BASELINE CONDITIONS OF PROJECT AREA

2.1. Physical and Natural Resources

Ghana is situated on the west coast of Africa and lies within longitudes 3°5'W and 1° 10'E and latitudes 4°35'N and 11°N, with a total area of 238,540 km². The country has a north south extent of about 670 km and a maximum east-west extent of about 560 km. It shares borders with Côte d'Ivoire to the west, Burkina Faso to the north, and Togo to the east. To the south are the Gulf of Guinea and the Atlantic Ocean. The country is divided into 16 administrative regions (formerly of 10 regions) and 254 Metropolitan, Municipal and District Assemblies (MMDAs) (Figure 2). The Project will be implemented across the 16 regions.

Figure 2: Administrative Map of Ghana



Ghana's topography is predominantly undulating and of low relief with slopes of less than 1 percent. Despite the gentle slopes, about 70 percent of the country is subject to moderate to severe sheet and gully erosion. The highest elevation in Ghana, Mount Afadjato in the Akwapim-Togo Ranges, rises 880 metres above sea level.

Ghana's water resources potential is divided into surface and groundwater sources. Surface water resources are mainly from three river systems that drain Ghana, namely: the Volta, South Western and Coastal river systems.

In terms of climate and vegetation, Ghana has a warm, humid climate. Mean annual rainfall of the country is estimated at 1187 mm. Mean annual temperatures range from 26.1 °C near the coast to 28.9 °C in the extreme north. There are six agro-ecological zones defined on the basis of climate, reflected by the natural vegetation and influenced by the soils. Rainfall distribution is bimodal in the forest, transitional and coastal zones, giving rise to a major and a minor growing season. In the remaining two agro-ecological zones, the unimodal rainfall distribution gives rise to only one growing season.

These physical conditions would largely inform or influence the implementation of the physical aspects of the project.

2.2 Socio-Economic Characteristics

2.2.1 Demographic Characteristics

Ghana's population as at 2010 stood at 24,658,823, comprising 12,024,845 (48.8%) males and 12,633,978

(51.2%) females, culminating into a sex ratio of 95.2. Currently, the country's population is estimated at 30,000,000. On regional basis, Ashanti Region is the most populous, with a population of 4,780,280, representing 19.4 percent of the country's total population followed by Greater Accra, with a population of 4,010,054 (16.3%). The least populous regions are Upper West with 702,110 persons constituting 2.8 percent of the total population and Upper East with 1,046,545 persons or 4.2 percent of Ghana's population. Population density stood at 103 persons per square kilometre in 2010. Average household size also stood at 4.4 (Ghana Statistical Service, 2012).

Ghana has a youthful population, thus consisting of a large proportion of children under 15 years, and a small proportion of elderly persons (65 years and older). The proportion of the population living in urban areas is 50.9 percent, with the level of urbanization varying from region to region.

Increasing population numbers, with large proportions in the youthful population implies economic burden/dependency on the available working group (15-64 years). The Project would therefore impact positively on the nation as it would provide jobs and employable skills to the potential workforce to lessen the economic burden.

2.2.2 Economic Characteristics

Of population aged 15 years and older in 2010, 71.1 percent are economically active (labour force) and of these, most are employed (94.7%). About two-fifth (41.2%) of this economically active population aged 15 years and older are into skilled agricultural, forestry and fishery workers. About 21 percent is also engaged as service and sales workers while 15.2 percent is craft and related trade workers. Skilled agricultural, forestry

and fishery work remain the dominant occupation for both males (44.9%) and females (37.7%). However, a much higher proportion of females (31.7%) than males (10.2%) is engaged as service and sales work. This pattern is generally the same for most of the regions, with the three northern regions (Northern, 73.3%; Upper West, 72.3%; Upper East, 70.1%) having relatively high proportions of the economically active population engaged as skilled agricultural, forestry and fishery workers. (Ghana Statistical Service, 2012).

According to the 2015 Labour Force Survey, about two-thirds (67.6 percent) of the labour force are employed, 9.1 percent are unemployed and 23.3 percent are not in the labour force. The survey also showed that more males than females are employed, depicting the national pattern.

The Project, which is an apprenticeship programme has the potential to absorb majority of the unemployed labour force and would impact positively on the national economy. It is however imperative that the Project takes into consideration a balance of apprenticeship programmes that can equitably satisfy the unemployment needs of both males and females.

2.3 Overview of Unemployment in Ghana.

According to Ghana Statistical Service (2016), total unemployment rate in Ghana is 11.9 percent; the rate is higher among females (12.5%) than males (11.1%). Unemployment is also higher in urban areas (13.4%) than in rural areas (10.2%).

There are marked differences in the unemployment rates in the regions, with Upper East (18.4%) recording the highest unemployment rate and Brong Ahafo (8.4%) recording the lowest. It is observed that the female unemployment rate is higher than that of males in all regions except Greater Accra (13.3% for females and 15.6% for males) and Brong Ahafo (6.8% for females and 10.1% for males) where the reverse is the case. (Figure 3).

In terms of age, unemployment rate declines with increasing age up to 64 years and increases thereafter. The unemployment rate is highest among the 15-24 year age group (25.9%) and lowest among the 45-64 year age group (6.0%). This general trend is true irrespective of sex and locality of residence. It is also observed that the unemployment rate is highest for the 15-24 year olds (42.0%) residing in the rural areas of the Upper East region.

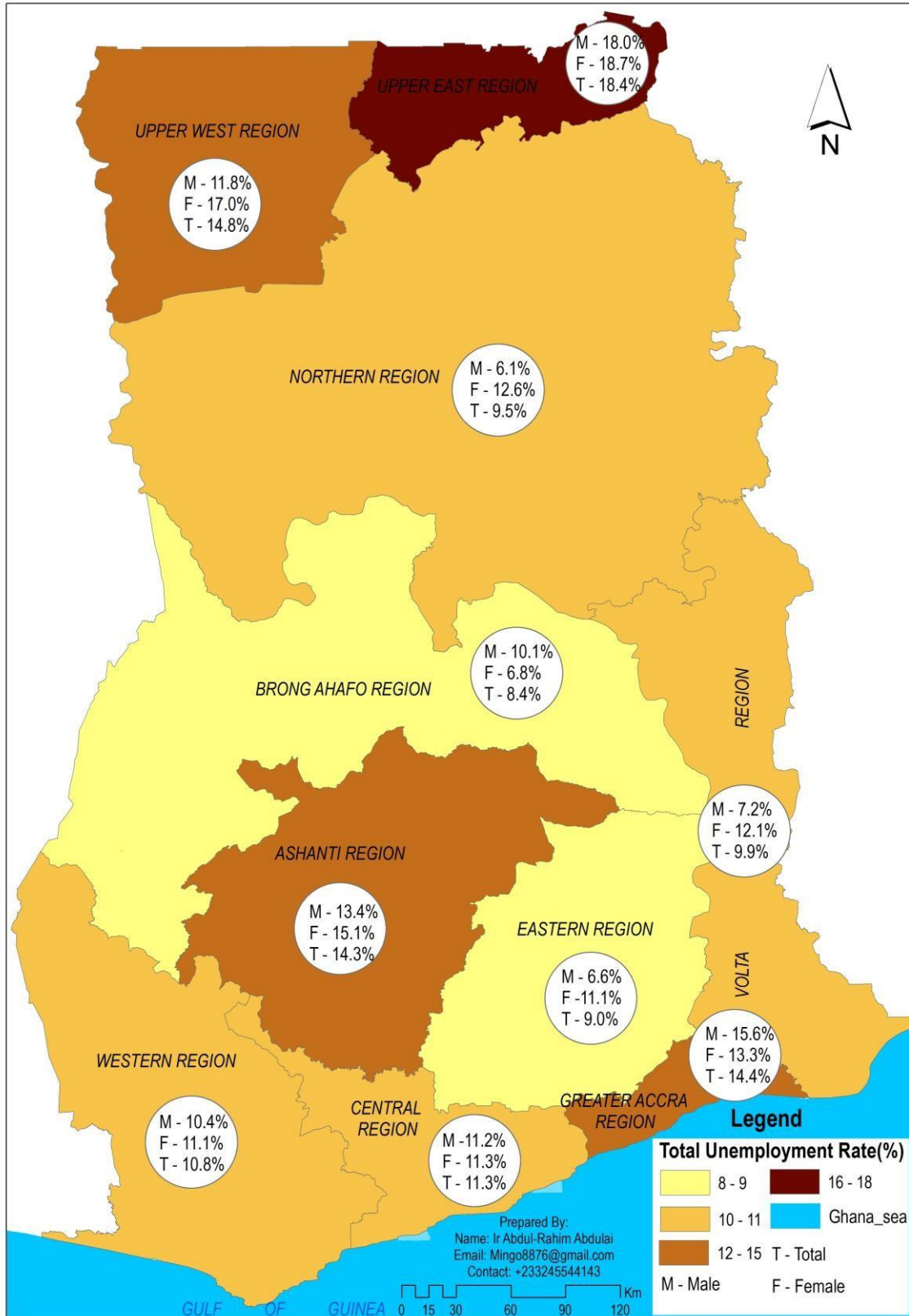
Regarding level of education, the unemployment rate is relatively higher for persons with education than those with no education. The unemployment rate is highest for persons with Secondary certificates, i.e. those who successfully completed SSS/SHS/Secondary education (19.3%) and those with MSLC or BECE certificates (11.3%). Persons with tertiary educational qualifications have the lowest unemployment rate (7.3%). Generally,

the unemployment rate is higher for females with no education (11.8%) and urban dwellers with no education (12.9%).

Youth (15-35 years) unemployment rate, which is an important indicator for monitoring the Millennium Development Goals, is 16.9 percent with Upper East region (25.2%) recording the highest rate. This is followed by Ashanti (20.2%) region and Greater Accra (19.1%). The lowest youth unemployment rate is recorded in the Brong Ahafo region (11.1%). The unemployment rate is higher for males than for females in three regions; Greater Accra (21.2% against 17.2%), Central (20.4% against 16.8%) and Brong Ahafo (12.8% against 9.6%).

According to the National Employment Policy (2014), unemployment is attributable to a number of factors including: (i) weak linkage between the educational system and productive sectors of the economy; (ii) mismatch of skills acquired by the youth vis-à-vis what is required by the job market; and (iii) weak support systems for entrepreneurship and small-scale business development for self-employment. The JSP therefore intends to use a combination of strategies, with multiple implementing agencies to tackle this unemployment as well as underemployment issue as described under section 1.2.

Figure 3: Unemployment Rate in Ghana by Regions, 2015.



2.4 Efforts at Addressing Unemployment in Ghana

The Government of Ghana and the private sector have made substantial efforts towards addressing the unemployment; nevertheless, fragmentation, poor monitoring and lack of evaluations mitigate impacts. A desk review found 26 public programs and 25 private programs that attempt to tackle employment (mostly youth employment) through a combination of skills development, entrepreneurship, employment services, direct employment and apprenticeships (Table 2). While there are large differences in size and approaches, some of these programs are large, indicating a genuine effort from both the private and public sectors to address the employment challenge. One of the largest ones is the Youth Employment Agency (YEA), which provides skills training and apprenticeship modules to support youth ages 15–35 years during the transition from unemployment to employment: its yearly budget is approximately 700 million GH¢, around 150 million USD. Nevertheless, there are system-wide challenges that have slowed down the ability to see gains. These include lack of coordination, resulting in fragmentation and duplication; limited monitoring and evaluation to assess the impacts of these programs; limited exit strategies and tracer studies; and limited information on quality, performance and outcomes of the employment and skills development programs. The Project would commission indepth reviews into the various programmes to recommend reforms to enhance their impact on skills and jobs.

Table 2: Overview of Youth Employment Programmes

Program	MDAs	Skills Development & Training	Entrepreneurial Training	Employment Services	Employment	Apprenticeship
Youth Employment Agency (YEA)	Ministry of Employment and Labor Relations	✓		✓	✓	✓
National Vocational Training Institute (NVTI)	Ministry of Employment and Labor Relations	✓	✓			✓
Graduate Business Support Scheme (GEBSS)	Ministry of Employment and Labor Relations		✓			

Corporative Council	Ministry of Employment and Labor Relations	✓				
Integrated Community Centers Employable (ICCES) for Skills	Ministry of Employment and Labor Relations	✓				
Opportunities industrialization Center Ghana	Ministry of Employment and Labor Relations	✓	✓			✓

(OICG)						
Management Development and Productivity Institute (MDPI)	Ministry of Employment and Labor Relations		✓			
Youth in Agriculture Programme	Ministry of Food and Agriculture	✓				
Youth in Cocoa Programme	Ministry of Food and Agriculture	✓				
GRATIS Foundation	Ministry of Trade and Industry	✓	✓			✓
Rural Enterprise Program (REP)	Ministry of Trade and Industry	✓				
Council for Technical Vocational Education Training-National Apprenticeship Program (COTVET-NAP)	Ministry of Education	✓				✓

Council for Technical Vocational Education Training-Ghana Skills Development Initiative (COTVET-GSDI)	Ministry of Education	✓				✓
Youth Leadership and Skills Training Institute (YLSTI)	Ministry of Youth and Sports	✓				
National Entrepreneurship Innovation Plan (NEIP)	Ministry of Business Development		✓			
Microfinance and Small Loans Center	Office of President					
Fisheries Commission	Ministry of Fisheries and Aquaculture Development	✓				
DBC, Mobile Applications Development	Ministry of Communications	✓	✓			
GSOP-Labor Intensive Public Works (LIPW)	Ministry of Local Government and Rural Development	✓				
Microfinance and Small Loans Centre (MASLOC)	Office of the President					
National Service Scheme	Ministry of Education		✓	✓		
Planting for food and Jobs	Ministry of Food and Agriculture		✓			
One-District OneFactory Program (1D1F)	Ministry of Trade and Industry	✓	✓			

National Board for Small Scale Industries (NBSSI) Programs	Ministry of Trade and industry	✓	✓			✓
National Builders" Corps	Office of The President			✓		
National Board for Small Scale Industries (NBSSI) Programs	Ministry of Trade and industry	✓	✓			✓
National Builders" Corps	Office of The President			✓		

3.0 ENVIRONMENTAL AND SOCIAL IMPACTS, ISSUES AND RISKS

3.1 Screening of the GJSP and Component Activiites

The GJSP would be implemented across the country and activities that would trigger potential environmental and social risks and impacts comprise (i) provision of competitive business start-up capital grants to individuals that receive entrepreneurship training under sub-component 2.1; (ii) provision of competitive grants to private enterprises under sub-component 2.2; (iii) installation of information and communication technology for the Ghana Labor Market Information System at Public Employment Centers, other relevant local centers, and relevant ministries and agencies under project component 3.1, and (iv) Upgradation of selected Public Employment Centers under sub-component 3.2.

The above attributes indicate the JSP as a program for which the appropriate level of Environmental

Assessment (EA) is the Strategic Environmental Assessment (SEA) and ESMF under the Ghana and the World Bank EA Procedures respectively. Due to the nature and scale of the activities, they are classified as Schedule 1 undertakings (i.e. projects which require registration and permit) under the Ghana system and Category B under the World Bank EA Procedures.

Based on experiences with similar projects, the project implementation may result in generation of noise, dust, and waste from construction/rehabilitation activities, occupational health and safety concerns, skills development, employment, improved capacity of training institutions and training coordinators and relocation of staff and office equipment. This would require to some extent the preparation and implementation of Environmental and Social Management Plans (See Appendix G for outline).

3.2 Major Environmental and Social Impacts, Issues and Risks.

The potential environmental and social risks and impacts associated with the specific project component activities are listed in Table 3.

Table 2: Component Activities and Potential Environmental and Social Impacts/Issues/Risks

1. Provision of apprenticeship and entrepreneurship and small and micro enterprise support to individuals and private enterprises for jobs under components 1 and 2	
<i>b. Environmental</i>	
<i>Impacts/Issues/Risks</i>	<i>Possible Sources</i>
Waste generation and management	<ul style="list-style-type: none"> • By products of business activities • Poor sanitary conditions at workplace • Possible use of grants for construction activities to expand business premises
Air Pollution	<ul style="list-style-type: none"> • Use of machinery at some business premises • Possible use of grants for construction activities to
	<ul style="list-style-type: none"> expand business premises □ Burning of waste materials

Noise and Vibration	<ul style="list-style-type: none"> • Use of workplace machinery • Possible use of grants for construction activities to expand business premises
Social	
Skills development	<ul style="list-style-type: none"> □ Entrepreneurial Training of MCPs, workers and apprentices
Improved capacity and skills of Training Providers and Training Coordinators	<ul style="list-style-type: none"> • Resource allocation to Training Institutions • Training and equipment supply to Training Coordinators
Decent jobs for individuals and private enterprises	<ul style="list-style-type: none"> □ Possibility of business expansions
Occupational, Safety and Health (OSH) Issues	<ul style="list-style-type: none"> • Lack of access and poor use of protective clothes • No proper water and sanitation practices at workplaces • Fire prevention and Control
Opportunity for women, the disabled and all vulnerable	<ul style="list-style-type: none"> □ Priority and opportunity to be given to vulnerable groups in society.
Greater Coordination and Synergy within Trade Associations	<ul style="list-style-type: none"> □ Use of Trade Associations as an important stakeholder in the training of MCPs and Apprentices
Gender Based Violence	<ul style="list-style-type: none"> □ Mixed gender at workplaces
Discrimination based on gender	<ul style="list-style-type: none"> □ Mixed gender at workplaces
Disagreement and Conflicts	<ul style="list-style-type: none"> □ Interaction at workplace
2. Upgradation of selected Public Employment Centers under project Component 3	
<i>c. Environmental</i>	
<i>Impacts/Issues/Risks</i>	<i>Possible Sources</i>
Creation of burrow pits leading to soil and land degradation	<ul style="list-style-type: none"> □ Sourcing of earth materials
Vegetation losses, soil disturbance and Erosion	<ul style="list-style-type: none"> □ Sourcing of earth materials

Air quality	<ul style="list-style-type: none"> • Rehabilitation works • Transport of construction materials and waste • Exhaust emissions for equipment including heavy duty trucks • Burning of construction waste
Vibration and Noise	<ul style="list-style-type: none"> • Site demolition activities • Rehabilitation works • Noise from equipment
Generation and disposal of solid waste	<input type="checkbox"/> Construction/rehabilitation works
	<input type="checkbox"/> Office waste
d. Social	
Relocation of staff and office equipment of PECs	<input type="checkbox"/> Rehabilitation and refurbishment activities
Occupational, Health and Safety risks	<input type="checkbox"/> Non-use of PPEs by construction workers <input type="checkbox"/> Absence of first aid treatment and potable water for construction workers
Employment to Contractors and construction workers	<input type="checkbox"/> Rehabilitation and refurbishment activities
Improved resource centre for employment.	<input type="checkbox"/> Rehabilitation and refurbishment activities
Lack of meaningful consultation/citizens engagement	<input type="checkbox"/> Rehabilitation and refurbishment activities
Possibility of dissent and complains	<input type="checkbox"/> Rehabilitation and refurbishment activities

4.0 POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK

The Environmental Policy and EA legislation and procedures of Ghana and those of the World Bank, which are relevant to the project, are outlined in this chapter. In principle the two sets of policies and procedures on environmental and social assessment are similar in many respects.

4.1 National Environmental Policies and Legislations

4.1.1 Ghana's Environmental Policy

The environmental policy of Ghana formulated in the National Environmental Action Plan (NEAP) of 1993 hinges strongly on „prevention“ as the most effective tool for environmental protection. The policy aims at a sound management of resources and environment, and the reconciliation between economic planning and environmental resource utilization for sustainable national development. It also seeks among others, to institute an environmental quality control and sustainable development programs by requiring prior EA of all developments, and to take appropriate measures to protect critical eco-systems, including the flora and fauna they contain against harmful effects, nuisance or destructive practices. The adoption of the NEAP led to the enactment of the EPA Act 1994 (Act 490); and subsequently the passing of the Ghana EIA Procedures into the EA Regulations, 1999 (LI 1652).

4.1.2 The Environmental Protection Agency Act, 1994 (Act 490)

The Environmental Protection Agency (EPA) Act, 1994 (Act 490) grants the EPA enforcement and standards-setting powers, and the power to ensure compliance with the Ghana EA requirements/procedures. Additionally, the Agency is required to create environmental awareness and build environmental capacity as relates all sectors, among others. The Agency (including its Regional and Zonal Offices) is also vested with the power to determine what constitutes an „adverse effect on the environment“ or an activity posing „a serious threat to the environment or public health“, to require EAs, EMPs, AERs,

etc. of an „undertaking“, to regulate and serve an enforcement notice for any offending or non-complying undertaking.

The Agency is required to conduct monitoring to verify compliance with given approval/permit conditions, required environmental standards and mitigation commitments. Furthermore, a requirement by EPA for an EA precludes any authorising Ministry, Department and Agency (MDA) from licensing, permitting, approving or consenting such undertaking, unless notified otherwise.

4.1.3 EA Regulations and Procedures 1999, LI 1652

The EA Regulations combine both assessment and environmental management systems. The regulations prohibit commencing an undertaking/activity without prior registration and environmental permitting (EP). Undertakings are grouped into schedules for ease of screening and registration and for environmental permitting. The schedules include undertakings requiring registration and environmental permitting (Schedule 1), EIA mandatory undertakings (Schedule 2), as well as Schedule 5 - relevant undertakings (located in Environmentally Sensitive Areas).

The Regulations also define the relevant stages and actions, including: registration, screening, preliminary environmental assessment (PEA), scoping and terms of reference (ToR), environmental impact assessment (EIA), review of EA reports, public notices and hearings, environmental permitting and certification, fees payment, EMP, AER, suspension/revocation of permit, complaints/appeals etc.

4.1.4 Fees and Charges (Amendment) Instrument 2015, LI 2228

The Fees and Charges (Amendment) Instrument, 2015 (LI 2228) stipulates the fees and charges to be paid by proponents with respect to Environmental Permits and Certificates.

4.1.5 Labour Act, 2003 (Act 651)

This amends and consolidates existing laws relating to labour, employers, trade unions and industrial relations. Provides for the rights and duties of employers and workers; legal or illegal strikes; guarantees trade unions and freedom of associations, and establishes the Labour Commission to mediate and act in respect of all labour issues.

4.2 Other National and Sector Policy Frameworks and Legislations

Table 4 portrays a summary of other key non-environmental national and sector policy frameworks and legislations.

Table 3: Other National and Sector Policy Frameworks and Legislations

Legal/Policy Framework	Relevance
Other National and Sector Policy Frameworks	
Ghana's Long Term Development Plan (2018 - 2057)	Framework for accelerated growth and actual reduction in poverty levels among Ghanaians.
Ghana Shared Development and Growth Agenda II (2014 - 2017)	Ensures and sustains macroeconomic stability, enhanced competitiveness of Ghana's private sector, accelerated agricultural modernisation and natural resource management, oil and gas development, infrastructure and human settlement development, human development, employment and productivity and transparent and accountable governance.
Occupational Safety and Health Policy of Ghana (Draft), 2004	Prevents accidents and injuries arising out of or linked with or occurring in the course of work, by minimizing, as far as reasonably practicable, the cause of the hazards in the working environment and, therefore, the risk to which employees and the public may be exposed". Derived from provisions of the International Labour Organization (ILO) Conventions 155 and 161.
National Workplace HIV/AIDS Policy, 2005	Among others, provides protection from discrimination in the workplace to people living with HIV and AIDS; prevents HIV and AIDS spread amongst workers; and provides care, support and counselling for those infected and affected.
National Land Policy 1999	supportive of the Northern Savanna Biodiversity Conservation Project (NSBCP), providing a framework for most of the land conservation activities identified under the components of the project. The NLP provides for the full recognition of protected area systems (PAS) and lands outside PAS for ecosystem maintenance and biodiversity conservation.
National Climate Change Policy, 2012	Provides strategic direction and co-ordinate issues of climate change in Ghana. The NCCP surpasses „traditional“ climate change policy areas of adaptation and mitigation. It emphasises that social development is of key concern and therefore cuts across both of these areas.
National Environmental Sanitation Policy, 2010	Describes the objectives of environmental sanitation to include developing a clean, safe and pleasant physical environment in all human settlements, promoting the social, economic and physical well-being of all sections of the population. Comprises of various activities including the construction and maintenance of sanitary infrastructure, provision of services, public education, community and individual action, regulation and legislation.
National Employment Policy, 2014.	The policy represents the intention of government to provide the policy response needed for addressing the unemployment situation and for defining the inter-linkages in the productive sectors and the institutional arrangements that need to work in harmony in order to place employment at the center of the macroeconomic development agenda.

National Gender Policy, 2015.	The overarching goal of this Policy is to mainstream gender equality concerns into the national development processes by improving the social, legal, civic, political, economic and socio-cultural conditions of the people of Ghana particularly women, girls, children, the vulnerable and people with special needs; persons with disability and the marginalized.
Other National Legislations	
<i>The 1992 Republican Constitution of Ghana</i>	The Constitution makes provisions that protect the right to private property and sets principles under which citizens may be deprived of their property in the interest of the public.
<i>Local Governance Act of 2016, Act 936</i>	Empowers the MMDAs to lead in local economic development in their areas of jurisdiction.
Factories, Offices and Shops Act, 1970, Act 328	Mandates the Factories Inspectorate Department under the Ministry of Employment and Social Welfare to register factories and ensure that internationally accepted standards of providing safety, health and welfare of persons are adhered to.
The State Lands Act 1962, Act 125	The State Lands Act 1962 (Act 125) has vested authority in the President of the Republic of Ghana to acquire land for the public interest via an executive instrument.

4.3 Environment and Social Assessment in Ghana

The EPA Act 1994 (Act 490) provides for the establishment of an Environmental Protection Agency with functions among others, to 'advise the minister on the formulation of policies on all aspects of the environment and in particular make recommendations for the protection of the environment'. The other parts of the Act include Enforcement and Control which gives powers to the Agency to request for an ESIA; Part three establishes an Environment Fund and finally Part four describes the administration and general provisions of the Act.

Part 1 of the Environmental Assessment Regulations, 1999 LI 1652 on Environmental Permit describes undertakings requiring registration and issuance of environmental permit, as:

1. No person shall commence any of the undertakings specified in Schedule 1 to these Regulations or any undertaking to which a matter in the Schedule relates, unless prior to the commencement, the undertaking has been registered by the Agency and an environmental permit has been issued by the Agency in respect of the undertaking.
2. No person shall commence activities in respect of any undertaking which in the opinion of the Agency has or is likely to have adverse effect on the environment or public health unless, prior to the commencement, the undertaking has been registered by the Agency in respect of the undertaking.'

The procedures establish an ESIA process to among others, provide enough relevant information to enable the EPA to set an appropriate level of assessment of any proposed undertaking, investment or programme for the necessary review and to facilitate the decision-making process for the ESIA approval. The procedures comprise activities such as project Registration, Screening, Scoping, Environmental Impact Statement (EIS) preparation, and Public hearing. The administrative flow chart suggesting a total process time of 90 days is shown in the Appendix B. The procedures are statutorily recognized under the EPA Act 1994 (Act 490). The Fees and Charges (Amendment) Instrument, 2015 (LI 2228) is an amendment to LI 1652 and provides for the substitution of regulations relating to 'fees and charges for environmental permits and certificates'.

4.4 The World Bank Requirements

The Bank's ten safeguard policies are designed to help ensure that programs proposed for financing are environmentally and socially sustainable, and thus improve decision-making. The Bank's Operational Policies (OP) are meant to ensure that operations of the Bank do not lead to adverse impacts or cause any harm. They include guidance on EA requirements. The following two are relevant for considerations under the project;

- Environmental Assessment (OP 4.01);
- World Bank Group Environmental, Health and Safety Guidelines

4.4.1 Environmental Assessment (OP 4.01)

The OP 4.01 requires among others that screening for potential impacts is carried out early, in order to determine the level of EA to assess and mitigate potential adverse impacts. The Bank's project screening criteria group projects into three categories:

- Category A – Detailed Environmental Assessment;
- Category B - Initial Environmental Examination; and
- Category C – Environmentally Friendly

The EA ensures that appropriate levels of environmental and social assessment are carried out as part of project design, including public consultation process, especially for Category A and B projects. The OP 4.01 is applicable to all components of the Bank's financed projects, even for co-financed components. This project is a Category B project.

4.4.2 WBG Environmental, Health and Safety Guidelines

The Environmental, Health, and Safety (EHS) Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). These General EHS Guidelines are designed to be used together with the relevant Industry Sector EHS Guidelines which provide guidance to users on EHS issues in specific industry sectors. The guideline under Occupational Health and Safety

mandates employers and supervisors to implement all reasonable precautions to protect the health and safety of workers. The guidelines provide examples of reasonable precautions to be implemented in managing principal risks to occupational health and safety.

Although the focus is placed on the operational phase of projects, much of the guidance also applies to construction and decommissioning activities. Projects should endeavor to hire contractors that have the technical capability to manage the occupational health and safety issues of their employees, extending the application of the hazard management activities through formal procurement agreements.

4.5 WB Safeguard Policies and Ghana Regulations

In case there is a disparity between the National EPA Regulations and the World Bank Policies, the more stringent standard of the two would apply.

5.0 FRAMEWORK ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (FRAMEWORK ESMP)

5.1 Environmental and Social Measures

The environmental and social measures at component activity level are enumerated in Table 5.

Table 4: Environmental and Social Measures at Component Activity Level

Potential Risks and Impacts	Possible Sources	Safeguards Measures
1. Provision of apprenticeship and entrepreneurship and small and micro enterprise support to individuals and private enterprises for jobs under components 1 and 2		
Waste generation and management	<ul style="list-style-type: none"> • By products of business activities • Poor sanitary conditions at workplace • Possible use of grants for construction activities to expand business premises 	<ul style="list-style-type: none"> • Waste segregation and reuse of waste as first option • Provide bins at workplace for storage of garbage (encourage sorting of waste) • All metal scrap waste will be disposed of at sites approved by the MMDAs or sold to approved third party agents for use by metal companies. • Excavated earth materials will, as much as possible, be re-used for back filling purposes to reduce • Regular cleaning and maintenance of drainage systems, sumps and oil interceptors • Use of oil trays for waste oil collection and reuse of waste oil for other activities
Air Pollution	<ul style="list-style-type: none"> • Use of machinery at some business premises • Possible use of grants for construction activities to expand business • Burning of waste materials 	<ul style="list-style-type: none"> • Work equipment and machinery to be regularly maintained and serviced to reduce emission when in use. • Engines of vehicles, equipment and machinery to be turned off when not in use. • Prohibition of open burning of waste

Noise and Vibration	<ul style="list-style-type: none"> • Use of workplace machinery • Possible use of grants for construction activities to expand business premises 	<ul style="list-style-type: none"> • Work equipment and machinery to be regularly maintained and serviced to reduce noise generation when in use. • Engines of vehicles, equipment and machinery to be turned off when not in use. Residents and other commercial activities to be notified in advance of noisy machinery before use
Occupational, Safety and Health (OSH) Issues	<ul style="list-style-type: none"> • Lack of access and poor use of protective clothes • No proper water and sanitation practices at workplaces • Fire prevention and Control 	<ul style="list-style-type: none"> □ All workers should be given proper induction/orientation on safety. □ Regularly service all equipment and machinery to ensure they are in good working condition. Ensure there are first aid kits on site and a trained person to administer first aid. □ Provide and enforce the use of appropriate personal protective equipment (PPE) □ Apply sanctions where safety procedures are not adhered to. □ Work places to be mandated to have fire extinguishers □ Proper information notification and orientation on safety at workplaces □ Conservation of electricity should be a priority at workplaces
Gender Based Violence	<ul style="list-style-type: none"> □ Mixed gender at workplaces 	<ul style="list-style-type: none"> □ Education and sensitization on gender based violence and rights of women at trainings. □ Training Service Providers and sub-contractors required to sign a code of conduct
Discrimination based on gender	<ul style="list-style-type: none"> □ Mixed gender at workplaces 	<ul style="list-style-type: none"> □ Provision of equal rights to both sexes at workplaces

		<ul style="list-style-type: none"> □ Ensuring that females enjoy their maximum maternity rights
Disagreement and Conflicts	<ul style="list-style-type: none"> □ Interaction at workplace 	<ul style="list-style-type: none"> □ Education on the need for tolerance and coexistence at workplaces during training programmes □ Training of work supervisors on conflict resolution for the management of conflicts and disagreements.
2. Upgradation of selected Public Employment Centers under project Component 3		
Creation of burrow pits leading to soil and land degradation	<ul style="list-style-type: none"> □ Sourcing of earth materials 	<ul style="list-style-type: none"> □ Sourcing of materials from approved sites □ Concurrent reclamation and backfilling □ Replanting of trees that have been removed □ Avoidance of sensitive vegetation for earth materials
Vegetation losses, soil disturbance and Erosion	<ul style="list-style-type: none"> □ Sourcing of earth materials 	<ul style="list-style-type: none"> □ Replanting of trees that have been removed □ Avoidance of sensitive vegetation for earth materials
Air quality	<ul style="list-style-type: none"> □ Rehabilitation works □ Transport of construction materials and waste □ Exhaust emissions for equipment including heavy duty trucks □ Burning of construction waste 	<ul style="list-style-type: none"> □ Soil/s and cement loads in transit to be well covered to reduce dust levels rising above acceptable levels. □ Stockpiles of exposed soil and unpaved access roads to be sprinkled with water to regulate dust levels. □ Use of good quality fuel and lubricants in vehicles, equipment and machinery. □ Ensure that heaped sand delivered for construction works is covered with tarpaulin to prevent wind and water transport of soil particles □ Engines of vehicles, machinery, and other equipment to be switched off when not in use. □ Regular scheduled maintenance and servicing to be carried out on all vehicles and equipment to minimize exhaust emissions.

		<ul style="list-style-type: none"> □ Construction and civil works to be phased out or controlled to reduce emissions from equipment and machinery
Vibration and Noise	<ul style="list-style-type: none"> □ Site demolition activities □ Rehabilitation works □ Noise from equipment 	<ul style="list-style-type: none"> □ Construction noise will be limited to restricted times agreed to in the permit □ During operations the engine covers of generators, air compressors and other powered mechanical equipment shall be closed, and equipment placed as far away from residential areas as possible □ Construction equipment and machinery to be regularly maintained and serviced to reduce noise generation when in use. □ Engines of vehicles, equipment and machinery to be turned off when not in use. □ Earthworks and other construction/rehabilitation activities to be phased out or controlled to reduce noise generation during construction. □ Neighboring residents and commercial activities to be notified in advance of the project before contractor mobilizes to site
Generation and disposal of solid waste	<ul style="list-style-type: none"> □ Construction/rehabilitation works □ Office waste 	<ul style="list-style-type: none"> □ Excavated earth materials will, as much as possible, be re-used for back filling purposes to reduce waste
		<ul style="list-style-type: none"> □ Excavated solid waste from the drain channel that are unsuitable for backfilling will be collected onsite, allowed to drain and collected for disposal at sites approved sites in collaboration by the MMDAs. □ Ensure that the required amounts of construction materials are delivered to site to reduce the possibility of the occurrence of excess material

		<ul style="list-style-type: none"> □ Provide bins on site for temporary storage of garbage such as lubricant containers, drinking water sachets and carrier bags/packaging materials. □ All metal scrap waste will be disposed of at sites approved by the MMDAs or sold to approved third party agents for use by metal companies.
Relocation of staff and office equipment of PECs	<ul style="list-style-type: none"> □ Rehabilitation and refurbishment activities 	<ul style="list-style-type: none"> □ Suitable relocation of staff and office equipment to a modest location.
Occupational, health and safety risks	<ul style="list-style-type: none"> □ Non-use of PPEs by construction workers □ Absence of first aid treatment and potable water for construction workers 	<ul style="list-style-type: none"> □ Engage experienced artisans for construction works. □ All workers should be given proper induction/orientation on safety. □ The contractors will have a Health & Safety Policy and procedures to guide the construction activities. □ Regularly service all equipment and machinery to ensure they are in good working condition. □ Ensure there are first aid kits on site and a trained person to administer first aid. □ Provide and enforce the use of appropriate personal protective equipment (PPE) such as safety boots, reflective jackets, hard hats, hand gloves, earplugs, nose masks, etc. □ Proof of competence for all equipment/machine operators will be required and established through inspection of valid drivers or operator"s license or documents. □ Comply with all site rules and regulations. □ Apply sanctions where safety procedures are not adhered to. □ Site meetings should create awareness on OHS.

Lack of meaningful consultation/citizens engagement	<ul style="list-style-type: none"> □ Rehabilitation and refurbishment activities 	<ul style="list-style-type: none"> □ Effective consultation with stakeholders including feedback throughout the project cycle.
Possibility of dissent and complains	<ul style="list-style-type: none"> □ Project implementation 	<ul style="list-style-type: none"> □ Design and implementation of an effective grievance redress mechanism.

5.2 The Environmental and Social Screening and Management Process

The purpose of the preliminary screening is to: (i) determine whether projects are likely to have potential negative environmental and social impacts; (ii) decide if form EA1 needs to be submitted to EPA; (iii) identify appropriate mitigation measures for activities with adverse impacts; (iv) incorporate mitigation measures into the project design; (v) review and approve projects proposals and (vi) monitor environmental and social impacts and concerns during implementation. The early screening process will also consider the provisions of the RFP for possible land acquisition and livelihood impacts. This would largely apply to the Upgradation of selected Public Employment Centers under project Component 3.

The Safeguards Specialist(s) on the project must foremost carry out the preliminary environmental and social screening of proposed projects by using the checklist suggested in **Appendix D** in close consultation with the respective Safeguards Focal Persons - PIUs/MMDAs. If significant impacts are anticipated, then the EPA must be consulted and the Ghana Environmental Assessment (EA) procedures duly followed. When there are minimal or no impacts (as determined using the checklist), Safeguards Specialist(s) would proceed with the minimum regular reporting requirements. The table below shows details of the screening and management process and responsibilities.

5.3 Environmental and Social Assessment Procedures to be followed by Projects

All sub-project undertaking will first be screened using the E&S Screening checklist developed as part of the ESMF. They will first go through the Identification and/or siting of the sub-project, followed by Environmental and Social screening of proposed project intervention to assist in project categorization and the subsequent recommendation of the appropriate instrument.

The Ghana EIA procedures (EPA, 1994) has also a process of screening and evaluating all developments, undertakings, projects and programmes which have the potential to give rise to significant environmental impacts.

Those projects requiring EPA clearance will only commence when an environmental permit has been procured from the EPA. The Agency has provided the list of projects for which ESIA is mandatory.

The following steps will be followed by the Project to ensure environmental and social compliance.

Step 1: Environmental Registration of the Project

The E&S Specialist at COTVET and MELR together with the Safeguards Focal Persons will be directly responsible for screening all projects and submitting EPA documentation

when required. Each project environmental and social review form will be completed and when necessary the EA Assessment Registration Forms will also be completed.

A sample copy for the screening form is given as **Appendix D** and the EA1 Form is provided in **the Appendix F** and the mitigation measures suggested in this ESMF as well as the checklist used in the screening exercise should assist in completing this Form. For projects for which EIA are mandatory, they should register with Form EA1.

Step 2: Screening

This activity in accordance with the EAR 1999 LI1652 is the responsibility of the EPA. The EPA environmental permitting procedure is shown in Appendix B. The Agency, within 25 days of receiving the Registration Form will take a decision by placing the project at the appropriate level of environmental assessment. The results will be communicated to the implementing agency with reasons, which could be any of the following:

- Objection to the project
- No objection to the project (equivalent to World Bank Category C Project)
- Preliminary Environmental Assessment (PEA) will be required (equivalent to World Bank Category B Project)
- Environmental and Social Impact Assessment (ESIA) required (equivalent to World Bank Category B or A Project).

For projects receiving the „no objection“ from the EPA (WB Category C project) and therefore have only minor environmental and social risks, the implementation agency may move to implement in accordance with pre-approved standards or codes of practices or the pre-approved guidelines for environmental and social management.

Step 3: Conduct environmental and social assessment studies

For Projects for which the decision is the conduct of a PEA (equivalent WB category B project) or and ESIA (WB Category B and A Projects), standalone reports will be prepared. The Ghana EPA statutorily requires an EIA for projects in sensitive areas.

The Safeguards Specialists will prepare the Terms of Reference for the ESIA, and follow procurement rules for the recruitment of consultants for the ESIA. The ToR may be prepared using issues identified during the screening exercise and also the registration of the project with the EPA. Also, the impact mitigation measures provided in this ESMF may provide some basis for the design of the ToR.

The ESIA will identify and evaluate potential environmental impacts for the proposed activities, evaluate alternatives, and design mitigation measures. The preparation of the ESIA will be done in consultation with stakeholders, including people who may be affected. Community consultations are critical in preparing a proposal for the activities likely to have impacts on the environment and communities. The community consultations should identify key issues and determine how the concerns of all parties will be addressed

in the ESIA. When an ESIA is necessary, the administrative process enacted by the EPA will be followed and executed.

Procedures for projects requiring an ESIA

First stage: Preparation of Terms of Reference

The results of identification, and extent of the ESIA (scoping), the terms of reference will be prepared by the Regional Safeguards Officer.

Second stage: Selection of consultant

Third stage: Preparation of the ESIA with community consultation The report will follow the following format:

- Description of the study area
- Description of the subproject
- Discussion and evaluation of alternatives
- Environment and Social description
- Legal and regulatory
- Identifying potential impacts of proposed sub-projects
- Process of public consultations
- Development of mitigation measures and a monitoring plan, including estimates of costs and responsibility for implementation of surveillance and monitoring

Step 4: Review and approval of the ESIA for the project; Publication / Dissemination of ESIA

The respective E&S Specialist will submit the draft ESIA to EPA on approval by the PCU/WB. The report will be reviewed by a cross-sectoral National Environmental and Social Impact Assessment Technical Review Committee (ESIA/TRC) made up of representatives of relevant Ministries, Departments and Agencies as determined by the EPA after preliminary review of the pertinent environmental and social issues associated with the project.

The review committee is expected to:

- Assist the Agency in screening/reviewing all Environmental Assessment Applications and Reports

(Environmental Impact Statements, Annual Environmental Reports, Environmental Management Plans and other related reports)

- Make recommendations to the Executive Director of the EPA for final decision-making
- Provide technical advice on conduct of assessments and related studies on undertakings and the reports submitted on them;
- Make recommendations on the adequacy of the assessment and any observed gap;
- Advice on the seriousness of such gaps and the risks or otherwise to decisions required to be made recommend whether the undertakings as proposed must be accepted and under what conditions, or not to be accepted and the reasons, as well provide guidance on how any outstanding issue/areas may be satisfactorily addressed.

Copies of ESIA will be placed at vantage points including the EPA Library, relevant MMDAs, EPA Regional Offices and the sector Ministry. EPA serves a 21-day public notice in the national and local newspapers about the ESIA publication and its availability for public comments.

Step 5: Public Hearing and Environmental Permitting Decision (EPD)

Regulation 17 of the LI 1652 specifies three conditions that must trigger the holding of a public hearing on a project by the Agency. These are:

- Where notice issued under regulation 16 results in great public reaction to the commencement of the proposed undertaking;
- Where the undertaking will involve the dislocation, relocation or resettlement of communities; and
- Where the Agency considers that the undertaking could have extensive and far-reaching effects on the environment.
- Where a public hearing is held, the processing of an application may extend beyond the prescribed timelines required for EPA's actions and decision-making.

Step 6: Environmental Permitting Decision (EPD)

Where the draft ESIA is found acceptable, the respective E&S Specialist will be notified to finalize the reports and submit eight hard copies and an electronic copy. Following submission to EPA, the project shall be issued an Environmental Permit within 15 working days and issue gazette notices.

Where the undertaking is approved, the PCU shall pay processing and permitting fees prior to collection of the permit. The fees are determined based on the Environmental Assessment Fees Regulations, 2002, LI 1703.

Table 5: Summary of Environmental Screening Process and Responsibilities

Step	Steps/Activities	Responsible	Collaboration	Service Provider
1.	Identification and/or siting of the sub-project	MELR - PIU COTVET-PIU	<ul style="list-style-type: none"> • PCU • MELR-E&SS • COTVET- E&SS • NBSSI & MESTI-SFPs • FP - Regional Labour Department □ FP - MMDA 	-
2.	Environmental and Social screening of proposed project intervention to assist in project formulation using E&S checklist.	<ul style="list-style-type: none"> •MELR-E&SS •COTVET-E&SS 	<ul style="list-style-type: none"> • PCU • NBSSI & MESTI-SFPs • FP - Regional Labour 	-

			Department □ FP - MMDA	
3.	Screening, categorization and identification of the required instrument (use the national EIA procedure)	<ul style="list-style-type: none"> • MELR-E&SS • COTVET-E&SS 	<ul style="list-style-type: none"> • PCU • MELR – PIU • FP - Regional Labour Department • FP - MMDA 	EPA
4.	Approval of the classification and the selected instrument by EPA & WB	<ul style="list-style-type: none"> • MELR-E&SS • COTVET-E&SS 	□ NBSSI & MESTI-SFPs	EPA WB
5.	Preparation of the safeguard document/instrument (ESIA, ESMP, RAP/ARAP, and feguards Audit.) in accordance with the national legislation/procedure (taking the nk policy into account requirements). Ba			
	Preparation and approval of the ToRs	MELR-E&SS COTVET-E&SS	<ul style="list-style-type: none"> • Procurement Specialist – PCU • FP - Regional Labour Department • FP - MMDA 	WB (for approval purposes only)
	Preparation of the report		<ul style="list-style-type: none"> • Procurement Specialist – PCU • FP - Regional Labour Department • FP - MMDA 	External Consultant
	Report validation and issuance of the permit (when required)		<ul style="list-style-type: none"> • Procurement Specialist – PCU • FP - Regional Labour Department • FP - MMDA 	EPA WB
	Disclosure of the document		<ul style="list-style-type: none"> • MELR-E&SS • COTVET- E&SS 	Media Websites of various institutions WB
6.	(i) Integrating the construction phase mitigation measures	Technical staff in charge of the subproject (TS-PCU)	<ul style="list-style-type: none"> • MELR-E&SS • COTVET, NBSSI & MESTI-SFPs - E&SS 	Control Supervisor

	and E&S clauses in the bidding document prior advertisement; (ii) Ensuring that the constructor prepares an ESMP (C-ESMP), gets it approved and integrates the relevant measures in the works breakdown structure (WBS) or execution plan.			
7.	Implementation of the other safeguards measures, including environmental monitoring (when relevant) and sensitization activities	<ul style="list-style-type: none"> • MELR-E&SS • COTVET-E&SS 	<input type="checkbox"/> FP - Regional Labour Department <input type="checkbox"/> FP - MMDA	Consultant NGOs CSOs
8.	Oversight of safeguards implementation (internal)	<ul style="list-style-type: none"> • MELR-E&SS • COTVET-E&SS 	<ul style="list-style-type: none"> • Monitoring and Evaluation Specialist (M&E-PCU) • NBSS & MESTI -SFPs • FP - Regional Labour Department <input type="checkbox"/> • FP - MMDA 	Supervising Firm
	Reporting on project safeguards performance and disclosure	<ul style="list-style-type: none"> • MELR-E&SS • COTVET-E&SS 	<input type="checkbox"/> M&E-PCU	MoF WB
	External oversight of the project safeguards compliance/performance	EPA	<ul style="list-style-type: none"> • MELR-E&SS • COTVET- E&SS • M&E-PCU 	-
9.	Building stakeholders' capacity in safeguards management.	<ul style="list-style-type: none"> • MELR-E&SS • COTVET-E&SS 	<input type="checkbox"/> Procurement Specialist - PCU	<input type="checkbox"/> EPA

10.	Independent evaluation of the safeguards performance (Audit)	<ul style="list-style-type: none"> • MELR-E&SS • COTVET-E&SS 	☐ Procurement Specialist - PCU	☐ Consultant
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5.4 Institutional Capacity for the Implementation of the Framework ESMP

The institutional capacity of the main implementing agencies; Ministry of Finance, Ministry of Employment and Labor Relations, Ministry of Science, Technology and Innovation, National Board for Small Scale Industries, and Council for Technical and Vocational Education and Training were assessed on their capacities to implement the ESMF. Environmental Protection Agency was also assessed. These MDAs were assessed based on their operational structure, budgetary resources and inventory, relevant skills and experience, adaptive management, stakeholder engagement, grievance redress and disclosure of information.

Aside the EPA, which had a positive result in all indicators assessed, the rest mostly had negative results

(Appendix C). The Ministry of Education also had positive response for almost all indicators due to other World Bank projects run by the Ministry (Skills Development Fund), which had Safeguards Specialists. The other IAs barely had any experience in handling environmental and social risks, hence the need for capacity building.

Capacity building in E&S assessment and management is essential for the ESMF implementation. The institutions need to understand the purpose of the ESMF, their expected roles and the extent to which the ESMF would facilitate the respective statutory functions. This would engender the required collaboration for the ESMF implementation.

The capacity building would include training workshops and production of guidance reports and tools. The following training programmes are recommended.

Table 6: Training Content for ESMF Capacity Building

Training content	Participants
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<ul style="list-style-type: none"> • World Bank Safeguard policies of OP 4.12 and OP 4.01; • World Bank Group EHS Guidelines • Ghana EPA Environmental Assessment Regulations • ESMF/ RPF • Stakeholder Engagement Techniques and Procedures • Screening Checklist • Preparation of Terms of Reference for ESIA's and RAPs • Completion of EA Registration Forms • Environmental and Social Management Plans • Grievance redress registration and resolution forms • Adherence to Decent Work • Emergency Response Preparedness • Gender and Gender Based Violence 	<p>PCU – MoF PIU – MELR PIU – MoE (COTVET and Skills Development Fund) PIU – MESTI PIU – MoTI (NBSSI) RCC Focal Persons MMDA Focal Persons Training Service Providers Contractors Supervising engineers Contractors/Service Providers/Supervising Engineers.</p>
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5.5 Openness and Transparency

Openness is the key to effective and inclusive development. It is the idea that citizens and governments can work together to achieve better results for all. Under this Project, openness and transparency would be achieved through the following mechanisms;

1. Rigorous Information, Education and Communication System

Information, Education, and Communication (IEC) will be a key feature of project implementation and will be pursued vigorously throughout the entire project cycle. Project IEC will target both internal and external audiences with varied objectives. Internal communication will aim at improving information flow, knowledge sharing and effective co-ordination amongst Project implementers. On the other hand, external communication will target sensitizing stakeholders, providing clarity on project implementation processes and intended benefits, enhancing visibility and dissemination of results for policy consideration. Specific tools to be used in internal and external communication are as follows:

a) Internal Communication

- i) Project Technical Committee meetings
- ii) Project Steering Committee meetings
- iii) Periodic briefing of MLGRD & RCCs
- iv) Generation and Circulation of Periodic Reports

b) External Communication

- i) Dedicated Project Website ii) Sensitization and review meetings
- iii) Workshops, seminars and exhibitions iv) Use of electronic and mass media platforms v) Field trips for target groups

2. Citizen Participation in Decision Making

Participation of direct and indirect project beneficiaries in decision making is another wavelength that would improve openness and transparency within the project. Through Trade Associations, beneficiaries of the project should be engaged periodically, starting with briefings on the project, its objectives, implementation arrangements and delivery mechanisms. This would allow for constructive contribution to decision making within the project. Feedback mechanism would also be established for continued access of project beneficiaries to project implementers.

3. Adopting Paperless Systems

The project would be encouraged to fully digitize all delivery mechanisms ranging from application for grants, financial systems, grievance redress, procurements, monitoring and evaluation. Robust management information systems for the various IAs would be encouraged to achieve greater transparency

4. Access to a Robust Complaints System

A robust complaints system where beneficiaries can seek redress would also enhance the openness and transparency of the project. This system should be easily accessible especially through dedicated hotlines to PIUs and PCU. There should also be a prompt feedback mechanism and allowable timelines for grievance resolution. This would increase beneficiary trust and confidence in the project.

5.6. Grievance Redress Mechanism

5.6.1 Rationale and Objectives

The Project would have multiple stakeholders and implementing agencies and would use a combination of approaches in the delivery of services and benefits. These processes could lead to complaints, misunderstandings, conflicts and disputes. There would therefore be a grievance mechanism that would provide all direct and indirect beneficiaries, service providers and other stakeholders to raise their concerns. These stakeholders would be informed of the grievance mechanism in place during

sensitisations and other interactions as well as the measures put in place to protect them against any reprisal for its use.

The objectives of the grievance process are to;

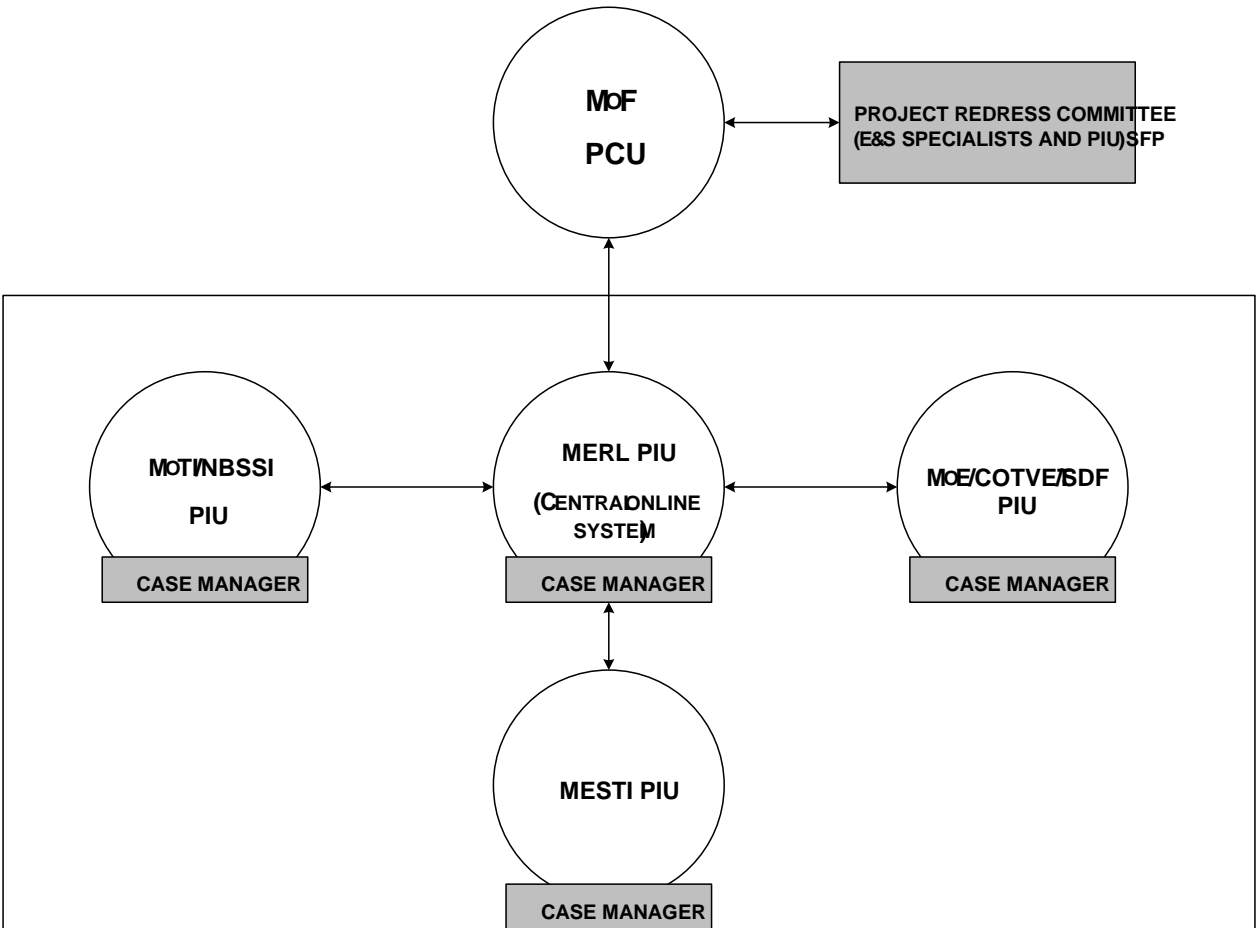
- Provide affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects;
- Ensure that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Avoid the need to resort to judicial proceedings.

5.6.2 Proposed Grievance Redress Mechanism

From the institutional arrangements, the Project would have a Project Coordinating Unit (MoF) and Project Implementation Units (MoE/COTVET, MoTI/NBSSI, MELR and MESTI). The proposed grievance redress mechanism would have a *central online system housed at the MELR PIU that links up and is accessible to the PCU at MoF and to all the PIUs.*

The Project grievance redress committee would be made up of all the E&S specialists and PIU Safeguards focal persons to resolve all grievances on the project. Each PIU would have a dedicated staff that records cases pertaining to the unit, either manually or electronically and feeds it onto the central system. The management and resolution of grievances which would be the primarily the responsibility of each PIU will automatically be communicated through the online system with the other members of the grievance redress committee as well as the PCU. Unresolved cases at the PIUs would then be the responsibility of the grievance redress committee. Escalated cases beyond the Project and Inter Ministerial Project Steering Committee level would be handled by the Ghana Judicial System. Figure 4 shows the proposed structure.

Figure 4: Proposed GRM Structure



The proposed GRM recommends four key steps as follows:

- Receive and register grievances or complaints;
- Acknowledge, assess and assign (Acknowledge receipt of grievance, outline how grievance will be processed, assess eligibility and assign responsibility)
- Propose Response
- Agreement on Response
- If agreement is reached, implement agreement
 - If agreement is not reached, review case and
 - If no agreement is reached under the review process, then the case can be referred to the law courts.

5.6.3 Recommended Grievance Redress Time Frame

Table 8 presents recommended timeframes for addressing grievance or disputes related to resettlement and compensation. Three levels of cases are envisaged for the project and this will have implications on the proposed time frames for resolution;

Level 1: Information verification and other minor cases

Level 2: Major cases to be handled under the Project's GRM

Level 3: Escalated cases to be handled by other agencies outside the project and the Judicial System of the country.

Table 7: Proposed GRM Time Frame

Step	Process	Time frame		
		Level 1	Level 2	Level 3
1	Receive and register grievance	within 24 hours	within 24 hours	within 24 hours
2	Acknowledge	within 24 hours	within 24 hours	within 24 hours
3	Assess eligibility of grievance	Within 24 hours	Within 24 hours	Within 24 hours
4	Assign responsibility	Within 2 Days	Within 2 Days	Within 5 Days
5	Development of response	within 7 Days	within 14 Days	within 74 Days
6	Implementation of response if agreement is reached	within 7 Days	within 14 Days	within 46 Days
7	Close grievance	within 2 Days	within 2 Days	within 2 Days
8	Initiate grievance review process if no agreement is reached	within 7 Days	within 7 Days	within 7 Days
9	Implement review recommendation and close grievance	within 14 Days	within 21 Days	within 100 Days

5.6.4 Grievance Documentation and Reporting

Resolved and Escalated grievances/cases would be documented daily (as tickets) into the centralised GRM system by the assigned grievance managers at the various PIUs. The Safeguards Specialist or a dedicated staff at the PCU would exercise an oversight over the system and tracks the resolution of all grievances/cases.

Monthly case/grievance reports would be generated from the system by the Safeguards Specialist or a dedicated staff at the PCU and report to the Project Coordinator to inform management decisions. Quarterly reports would also be generated and reported to the MoF as part of the Project's Progress Reporting as well as the World Bank. Periodic

reports would also be generated for stakeholders upon request irrespective of the period (e.g bi-annual, annual etc.)

5.7 Environmental and Social Monitoring

Monitoring is a key component of the ESMF during project implementation. It would verify the effectiveness of impact management, including the extent to which mitigation and enhancement measures are successfully implemented.

The monitoring issues at the ESMF level include confirmation of the dissemination of the ESMF as well as capacity building and training activities. At the activity level, this will encompass instituting monitoring actions to, for example, confirm the screening of projects, preparation of the ESIA reports, acquisition of environmental permits etc. Table 8 shows the monitoring and evaluation plan.

Table 8: ESMF Monitoring Plan

No	Monitoring level	Monitoring Issue	Means of Verification	Responsibility
1.	ESMF level	Adequate dissemination of ESMF to stakeholders	<ul style="list-style-type: none"> • Record of consultations and meetings □ Workshop reports • Media Advertisement 	PCU Consultant
		Capacity building and training programs	Training reports	PCU, EPA Consultants
2.	Sub- project activity level	Screening of sub project	Checklist completed	Safeguards Specialist
		Completion of EA1 form	Completed EA1 Form submitted to the EPA	Safeguards Specialist
		Adequate mitigation measures provided to manage adverse impacts	ESMPs prepared	Safeguards Specialist, EPA
		Project satisfies statutory provisions EPA Act 1994 (Act 490) LI 1652	EPA Permit for sub – project (s)	Safeguards Specialist, EPA
		Post project monitoring and evaluation	Monitoring reports, annual environmental reports	PCU, EPA

5.8 Budget for ESMF Implementation

The implementation of the ESMF would have budget implications in terms of awareness creation, capacity improvement and training workshops as well as dissemination of ESMF to key stakeholders involved in the implementation of proposed interventions. The budget is estimated at UDS 205,000 (Table 10).

Table 9: Estimated Budget for ESMF Implementation

No	Activity	Description	Annual cost, US\$	Total Cost, US\$	Responsibility
1. Training and Capacity Building					
1a	Awareness creation and Capacity building for PCU, PIUs and Safeguards Focal persons	Training workshop/seminars	10,000 x 2 during Year 1	220,000	E&S Specialists
1b	Awareness creation and capacity building for Contractors, Supervising engineers.	Training workshop/seminars	10,000 during Year 1	10,000	E&S Specialists
2.	Guidance and tools	Guidance Documents, Checklists, Forms, TORs.	-	15,000	PCU and PIUs
3.	ESMF Dissemination and Disclosure	Workshops and Newspaper	-	10,000	PCU
4.	EPA Permits for PECs	Registration of Permits and Enforcement of Mitigation measures	-	10,000	E&S Specialists
5	Preparation, Disclosure and Implementation of ESMPs	ESMPs for 10 No. PECs	-	80,000	External Firm
6.	Development of a Grievance Redress Mechanism	An Online Grievance Redress System	-	20,000	External Firm
7.	Monitoring and Evaluation	Safeguards component for M&E	10,000	40,000	PCU and PIUs
	TOTAL			205,000	

6. ESMF PREPARATION AND DISCLOSURE

This ESMF has been prepared in accordance with the applicable World Bank safeguards policies, which involved the following activities:

- Review of Literature
- Public Consultations
- ESMF preparation and Disclosure

6.1 Review of Literature

The main National and the World Bank safeguards reference documents reviewed included: Environmental and Social Management Framework for World Bank Projects with Multiple Small-Scale Subprojects: A Toolkit (the ESMF Toolkit); World Bank's Environmental and Social Safeguards Policies (OP 4.01 and OP 4.12); World Bank's Environmental and Social Framework; ESMFs of previous and on-going World Bank Projects, Environmental Protection Agency Act, 1994 (Act 490); Environmental Assessment Regulations, 1999 (LI 1652); National Environmental Action Plan; Ghana EIA Procedures; National Employment Policy and other national policies and legislations;

6.2 Public Consultations

Public consultations were also held with key representative stakeholders at the national and local levels.

The national consultations involved meeting key representatives of Ministry of Finance (MoF), Ministry of

Employment and Labour Relations (MELR), Ministry of Education- Council for Technical and Vocational Education Training (COTVET) – Ghana TVET Voucher Program, Ministry of Trade and Industry (MoTI) – National Board for Small Scale Industries, and Ministry of Science, Technology and Innovation.

The local consultations included field visits to the Public Employment Centre (PEC) at Tema Metropolis and focus group discussions with Training Coordinators and Master Crafts Persons of Association of Garages and Ghana Cooperative Fashion Designers Association (GCFDA), both under the Ghana TVET Voucher Project in Greater Accra Region.

Sets of stakeholder participatory questionnaires were prepared for the ESMF process to include general environmental and social issues and institutional capacity assessment in safeguards administration. Consultation notes of the above are presented in Appendix A.

6.3 ESMF Disclosure

The EPA and World Bank policies require that environmental reports/ESIA documents for projects are made available to project affected groups, local NGOs and CSOs, and the public at large. Following clearance from the World Bank, the Government of Ghana would disclose the framework through print media advertisements and copies made available in selected public places. The advertisement would provide:

- a brief description of the Project;
- a list of venues where the ESMF report is on display and available for viewing;
- duration of the display period; and
- contact information for comments

The ESMF would finally be disclosed in the national dailies and on the websites of the PCU and PIUs as well as the World Bank's Info Shop.

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APPENDICES

Appendix A: Public Consultations

1. Consultation Notes: Meeting with Representative of National Board for Small Scale Industries (NBSSI) on 15th February, 2019 on JSP ESMF Preparation.			
<i>Attendance</i>			
<i>Name</i>	<i>Designation</i>	<i>Contact</i>	<i>Email</i>
Kosi Yankey	Executive Director	0209471555	Kosi.yankey@gmail.com
Abdul-Rahim Abdulai	Safeguards Consultant	0245544143	mingo8876@gmail.com
<i>Main Issues Discussed</i>			
<i>Issue/Question</i>	<i>Response</i>		
Mandate of NBSSI	<ol style="list-style-type: none"> To contribute to the creation of an enabling environment for small-scale enterprise development. Facilitate Medium to Small Enterprises (MSEs) access to substantial and high quality Business Development Services for their development. 		
Employment Sectors	Hairdressing, barbering, fashion design, beads dressing accessories, cookery, leather works, auto mechanics, auto electrics, general electrical. tile layering, masonry and aluminium fabrication.		
Role of NBSSI in Project	Entrepreneurship training, both training and start up grants.		
Environment, Health and Safety Issues?	Occupation, safety and health training conducted as part of entrepreneurship training Details: <ol style="list-style-type: none"> Handling waste generated from businesses Use of protective clothes Proper water and sanitation practices at workplaces Conservation of power Fire prevention and Control 		
	Impacts	Mitigation	

Environment and Social Impacts and Mitigation Measures.	Employment Skills development Waste generation Possibility of gender based violence at work environment (sexual harassments)	Waste disaggregation and recycling Code of Conduct requirement from business owners Education and sensitization on gender based violence and rights of women at trainings.
Key Social Issues	Gender Issues	1. 60% of participants are women (86000 women against 54,6777 men so far trained) 2. NBSSI has a dedicated product in women entrepreneurship training
	Disability	1. There is an MoU with Ghana Blind Association to include the blind in skills and entrepreneurship training 2. Training Officers have also been trained to handle blind people. 3. People with Disabilities (PWDs) are generally in training and disbursement of grants
	Citizen"s	NBSSI makes stakeholder engagements a priority.
	Engagement	
Grievance Redress Mechanism (GRM)	a. Yes, complaints are made through the Business Advisory Centres (BACs), through the Regional NBSSI offices, then to the national office. b. An online system that will connect all district, regional and national offices.	
a. Do you have an existing GRM? b. Proposed GRM Structure.		
Openness and Accountability	1. Periodic reports are sent clients and other stakeholders 2. NBSSI also has online platforms (WhatsApp) with partners, where information is shared on regular basis. 3. NBSSI also ensures that monitoring and evaluation is done with implementing partners. 4. Round table discussions are also been held with implementing partners to promote openness in project implementation.	



2. Consultation Notes: Meeting with Representative of Ministry of Education on 18th February, 2019 on JSP ESMF Preparation.

<i>Attendance</i>			
<i>Name</i>	<i>Designation</i>	<i>Contact</i>	<i>Email</i>
Osei Kakari	Safeguards Officer	0501301413	Oseikakari63@gmail.com
Abdul-Rahim Abdulai	Safeguards Consultant	0245544143	mingo8876@gmail.com
<i>Main Issues Discussed</i>			
<i>Issue/Question</i>	<i>Response</i>		

Coverage	1. Provision of apprenticeship training through COTVET 2. Provision of training grants to private enterprises for expanded development through Skills Development Fund.	
Environment and Social Impacts and Mitigation Measures.	Impacts	Mitigation
	1. Skills development for MCPs, Workers and Apprentices 2. Boost in business with entrepreneurship training 3. Jobs for TPs and Training Coordinators 4. Occupational, Safety and Health (OSH) Issues 5. Waste generation	1. OSH Policies for various trade areas designed and adhered to. 2. Disaggregation and reuse of waste
Grievance Redress Mechanism	Through the Skills Development Fund (SDF), a grievance redress mechanism is already in place. All complaints are routed through the regional offices of SDF, which are forwarded to the SDF Committee for redress.	



3. Consultation Notes: Meeting with Representative of Ministry of Employment and Labour Relations (MELR) on 18th February, 2019 on JSP ESMF Preparation.			
<i>Attendance</i>			
<i>Name</i>	<i>Designation</i>	<i>Contact</i>	<i>Email</i>
Ernest Berko	Deputy Director, PBME	0264511444	ekberkoe@yahoo.com
Abdul-Rahim Abdulai	Safeguards Consultant	0245544143	mingo8876@gmail.com
<i>Main Issues Discussed</i>			

<i>Issue/Question</i>	<i>Response</i>	
Role on the Project	Implementation of Component 3 1. Development and operationalization of Ghana Labour Market Information System (GLMIS) 2. Development of District Public Employment Centres (PECs) 3. Review of Government Youth Employment and Skills Development Programme.	
Environment and Social Impacts and Mitigation Measures □ <i>Rehabilitation of Public Employment Centres</i>	Impacts	Mitigation
	1. Improved system of connecting job seekers and employers through well-equipped PECs 2. Employment to construction workers 3. Possible relocation of staff 4. Noise and Air Pollution 5. Occupational, Health and Safety risks 6. Construction waste	1. Finding alternative office space for staff of PEC for the rehabilitation period. 2. Use of quality machinery to reduce air pollution; engines of machines put off, when not in use; delivered sand in trucks should be covered. 3. Construction workers required to use PPEs 4. Proper disposal of construction waste.
Key Social Issues	Gender Issues	The MELR is expected to kowtow to the tenets of the Affirmative Action Bill when passed into law.
	Disability	PECs should be refurbished to be disability friendly.
Grievance Redress Mechanism	1. All grievances regarding the project should be directed through the District Labour Offices/ District Public Employment Centres for redress. 2. The Regional Labour Offices and the MELR will serve as referrals for all unresolved cases. 3. Cases will be taken through phone calls, walk-ins and emails.	



4. Consultation Notes: Meeting with Representative of Ministry of Finance (MoF) on 18th February, 2019 on JSP ESMF Preparation.

Attendance

<i>Name</i>	<i>Designation</i>	<i>Contact</i>	<i>Email</i>
Franklin Ashiadey	Principal Economist	0244689819	franklinashiadey@gmail.com
Abdul-Rahim Abdulai	Safeguards Consultant	0245544143	mingo8876@gmail.com
<i>Main Issues Discussed</i>			
<i>Issue/Question</i>	<i>Response</i>		
General Overview of Project	The project is to support jobs and skills for individuals in Ghana. It is expected to cover all 10 regions and all 254 MMDAs. The project comprises of four components for skills development and job generation.		
Key Role of MoF in Project	MoF will perform a coordination role and others such as monitoring and evaluation, procurement, financial management and safeguards.		
Environment and Social Impacts and Mitigation Measures	Impacts	Mitigation	
	Employment creation Skills development (Entrepreneurial) Noise generation Air Pollution Waste generation	Use of quality machinery Waste disaggregation and reuse	
Key Social Issues	Gender Issues	The MELR is expected to kowtow to the tenets of the Affirmative Action Bill when passed into law.	
	Disability	PECs should be refurbished to be disability friendly.	
Grievance Redress Mechanism	<p>1. Proposal that each implementing agency operates its grievance redress mechanism and feeding into a centralized system.</p> <p>2. A centralized system that will be online for all stakeholders to access.</p>		
Project Openness and Accountability	Development of Project Website for information sharing and access.		



5. Consultation Notes: Meeting with Representative of Ministry of Environment Science and Technology (MESTI) on 18th February, 2019 on JSP ESMF Preparation.

Attendance			
<i>Name</i>	<i>Designation</i>	<i>Contact</i>	<i>Email</i>
Adelaide Asante	Ag Director, STI	0244567666	adelaide.gh@yahoo.co.uk
Abdul-Rahim Abdulai	Safeguards Consultant	0245544143	mingo8876@gmail.com
<i>Main Issues Discussed</i>			
<i>Issue/Question</i>	<i>Response</i>		
Key Role of MESTI in Project	<p>1. MESTI will play a key role in technology and innovation partnerships with COTVET and private sector.</p> <p>2. These innovations can be in the form of incubations, young ideas, softwares and applications.</p>		
Environment and Social Impacts and Mitigation Measures	Impacts	Mitigation	
	Transfer of technology to private and public firms. Skills Development Employment creation	-	
Grievance Redress Mechanism	MESTI will not be a main implementer of any of the components, so would not need a GRM on its own. However, any GRM should build on the existing one SDF has.		
Project Openness and Accountability	Openness and accountability can only be promoted if all systems are made paperless, ranging from application for grants, financial systems, grievance redress, and procurements.		
General Recommendations	<p>1. The project can establish a National Research and Innovation Fund that would engage in product development and transfer.</p> <p>2. A Science, Technology and Innovation (STI) Management Information System should also be established to link formal institutions (Universities and Public Research Institutions) and public and private businesses.</p>		

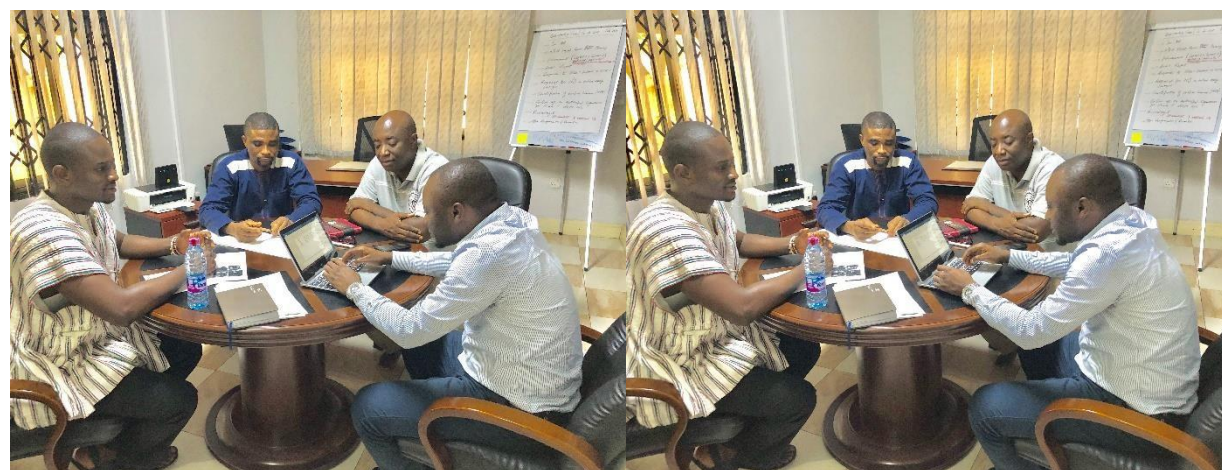


6. Consultation Notes: Meeting with Representative of Council for Technical and Vocational Education Training (COTVET) – Ghana TVET Voucher Project on 19th February, 2019 on JSP ESMF Preparation.

Attendance			
<i>Name</i>	<i>Designation</i>	<i>Contact</i>	<i>Email</i>
Collins Armah	Deputy Team Leader	0242788978	Collins.armah@planco.org
Emmanuel Bekoe	Voucher Fund, GTVP	0207379820	e.bekoe@cotvet.gov.gh
Egya Kojo Botwe	Voucher, Officer, GA	0267022386	egyakojobotwe@gmail.com
Abdul-Rahim Abdulai	Safeguards Consultant	0245544143	mingo8876@gmail.com
<i>Main Issues Discussed</i>			
<i>Issue/Question</i>	<i>Response</i>		
Trade Areas	Beauty/Cosmetics (Cosmetology); Consumer Electronics; Automotive repair; Building Construction (Welding and fabrication); Garment/tailoring/dressmaking; Catering and hospitality; Plumbing; Block layering and tiling; Electrical installation; and Furniture masking.		
Coverage	Greater Accra Region; Volta Region; Northern Region; Ashanti Region; Eastern Region; Western Region; and Central Region.		
Details of Training	A.English, Maths, Science, ICT, Interpersonal Relations, Entrepreneurship B. Safety at work place		

Environment, Health and Safety (EHS) Issues	<ol style="list-style-type: none"> 1. EHS issues is an inbuilt course as part of the training programme. 2. As part of COTVET accreditation requirements, Health and Safety Policy of Training Provider (TP) is mandatory 3. COTVET also ensures that the environment of the training provider is compliant with certain environmental standards e.g availability of fire extinguishers, fire exits and first aid. 4. Facilitators in a TP are also certified by COTVET including those in charge of EHS. 	
Environment and Social Impacts and Mitigation Measures	<p>Impacts</p> <ol style="list-style-type: none"> 1. Skills development for MCPs, Workers and Apprentices 2. Boost in business with entrepreneurship training 3. Jobs for TPs and Training Coordinators 4. Occupational, Safety and Health (OSH) Issues 5. Waste generation 	<p>Mitigation</p> <ol style="list-style-type: none"> 1. OSH Policies for various trade areas designed and adhered to. 2. Disaggregation and reuse of waste
	Gender Issues	A target of 35% female representation was made for the project but now there is 75% representation.
	Disability	<ol style="list-style-type: none"> 1. TPs are entreated to have structures that are disability friendly. 2. Designated schools for disability admitted as part of the programme to
		train solely people with disabilities. (St Theresa"s in Volta Region and Jachie Pramso Vocational Institute)
Grievance Redress Mechanism	<ol style="list-style-type: none"> a. There are structures in place for grievance redress. <ul style="list-style-type: none"> • Training Coordinators and Trade Associations handle cases at the MCP and Apprentices level • Unresolved cases are referred to Regional Voucher Officers or regional offices of Ghana Skills Development Initiative (GSDI) for redress • Pending cases are escalated from the regional to the National Project Office for final redress. • Contacts are made available at all these levels b. Complaints are gotten through phone calls, walk-in reports, emails, WhatsApp group messages, feedback for monthly discussions. 	

Openness and Accountability	<ol style="list-style-type: none"> 1. Openness and accountability is promoted through the use of Voucher Management System (VMS), which ensures effective use of funds, attendance management and monitors the training process. The system is also tied with a GPS location. 2. The VMS also helps COTVET to digitize the accreditation process.
General Recommendations	<ol style="list-style-type: none"> 1. The project can establish a National Research and Innovation Fund that would engage in product development and transfer. 2. A Science, Technology and Innovation (STI) Management Information System should also be established to link formal institutions (Universities and Public Research Institutions) and public and private businesses.



7. Consultation Notes: Meeting with Representative of Master Craftsmen of Association of Garages – Ghana TVET Voucher Project on 20th February, 2019 on JSP ESMF Preparation.			
Attendance			
<i>Name</i>	<i>Designation</i>	<i>Contact</i>	<i>Email</i>
Yakubu Musah	Auto Mechanic (MCP)	0277411169	-
Seth Klugah	Auto Mechanic (MCP)	0244368822	kobmeck@gmail.com
Frederick T. Padi	Training Coordinator	0243256576	fpadi@yahoo.com
Egya Kojo Botwe	Voucher Officer, Ghana TVET Voucher Program	0267022386	egyakojobotwe@gmail.com
Abdul-Rahim Abdulai	Safeguards Consultant	0245544143	mingo8876@gmail.com
Main Issues Discussed			
<i>Issue/Question</i>	<i>Response</i>		

Trade Areas	Automotive Repair	
Details of Training	Main Courses: English, Maths, Science, ICT, Interpersonal Relations, Entrepreneurship. Other Courses: Safety, Health and Environment , Welding, auto mechanics etc Details of Safety at Work : Use of PPEs, use of fire extinguishers, tidying workshops, etc.	
Training Institutions and Period of Training	National Vocational Training Institute; Accra Technical Training Centre Period of Apprentice Training Programme is 1.5 years for National Proficiency Certificate 1 and 3 years for National Proficiency Certificate 2.	
Environment and Social Impacts and Mitigation Measures	Impacts	Mitigation
	1. Waste generation (rubber, oil, filters, papers and tires) 2. Air Pollution (gaseous emissions) 3. Skills development of MCPs, workers and apprentices	1. Reuse of some of the waste (oil and plastics) 2. Use good filters to reduce excessive pollution.
	Gender Issues	This craft is mainly male dominated.
	Disability	1. Disabled MCPs and Apprentices are given an extra amount for motivation. 2. There is no deliberate attempt to involve disability associations in the training of disabled participants (especially Blind and Deaf Associations)
	Citizens Engagement	Association of garages hold periodic meetings to deliberate on issues on the project and feedback communicated to the Project, through periodic meetings with especially training Coordinators (mostly leadership of the association).
Grievance Redress Mechanism	There is no official GRM in operation. However, issues from the training are being reported to and handled by the Training Coordinators (TCs) and Trade Associations. Where they are not able to handle these cases, they report to the Voucher Officers at the Project Office.	
Openness and Accountability	1. Trade Associations should be educated enough to hold the project accountable. 2. The TVET project should also follow strictly the implementation guidelines of the project.	
Recommendations	1. Master Craft Persons (MCPs) should be compensated by the Project to train apprentices and with that MCPs can be held accountable. Instances are cited of apprentices going through the training but expelled by the MCPs at work. 2. It is suggested that all Trade Associations register with COTVET for better regulation of the technical and vocational industry.	



8. Consultation Notes: Meeting with Representative of Public Employment Centre, Tema Metropolitan Assembly on 20th February, 2019 on JSP ESMF Preparation.

Attendance

<i>Name</i>	<i>Designation</i>	<i>Contact</i>	<i>Email</i>
Emmanuel Amponsah Marfo	Employer Officer	0246657893	Kwasimarfo22@gmail.com
Abdul-Rahim Abdulai	Safeguards Consultant	0245544143	mingo8876@gmail.com

Main Issues Discussed

<i>Issue/Question</i>	<i>Response</i>
Background to PECs	<p>1. Public Employment Centres (PECs) are walk in centres across the country, where individuals can register for existing and non-existing vacancies.</p> <p>2. PECs were opened with the Labour department in 1938.</p> <p>3. Some PECs are stand alone establishments, whilst majority of them are combined with the District Labour Offices</p> <p>4. Most common types of jobs: Security Jobs, Accounts Officers, Labourers, Marketers, House Workers and drivers.</p> <p>5. Summary of Yearly Employment figures: 2018 – 258 (157 Males and 101 Females)</p> <p style="text-align: right;">2017 – 128 (79 Males and 49 Females)</p>
Potential refurbishments	1. Roofing 2. Painting 3. Modern Office Equipment

Staff Strength	3 Core Staff, 1 Security, 2 Services Persons	
Ghana Labour Market Information System (GLMIS) vis – a – vis PEC	Both will complement each other as systems for both job seekers and employers. PECs would still be needed for especially illiterate job seekers to access.	
Environment and Social Impacts and Mitigation Measures	Impacts	Mitigation
	<ol style="list-style-type: none"> 1. Improved system of connecting job seekers and employers through well-equipped PECs 2. Employment to construction workers 3. Possible relocation of staff 4. Noise and Air Pollution 5. Occupational, Health and Safety risks 6. Construction waste 	<ol style="list-style-type: none"> 1. Finding alternative office space for staff of PEC for the rehabilitation period. 2. Use of quality machinery to reduce air pollution; engines of machines put off, when not in use; delivered sand in trucks should be covered. 3. Construction workers required to use PPEs 4. Proper disposal of construction waste.
	Gender Issues	There is no gender preference. Recruitment depends on the request of the employer, who state categorically their gender preference on the Vacancy Registration Card PEC 6 (see picture below).
	Disability	By law, disabled people are given some preference, but once again, the employers requests are paramount.
Grievance Redress Mechanism	Grievances arising from the proposed project can be rooted through the Labour Department, which would see to its resolution.	
	It is also possible to establish a GRM within the GLMIS	
Main Challenges of PEC	<ol style="list-style-type: none"> 1. Inadequate office equipment (one functioning computer)...laptops, scanners, furniture, printer 2. No Internet 3. Under staffing 4. Limited monitoring due to no vehicle 	



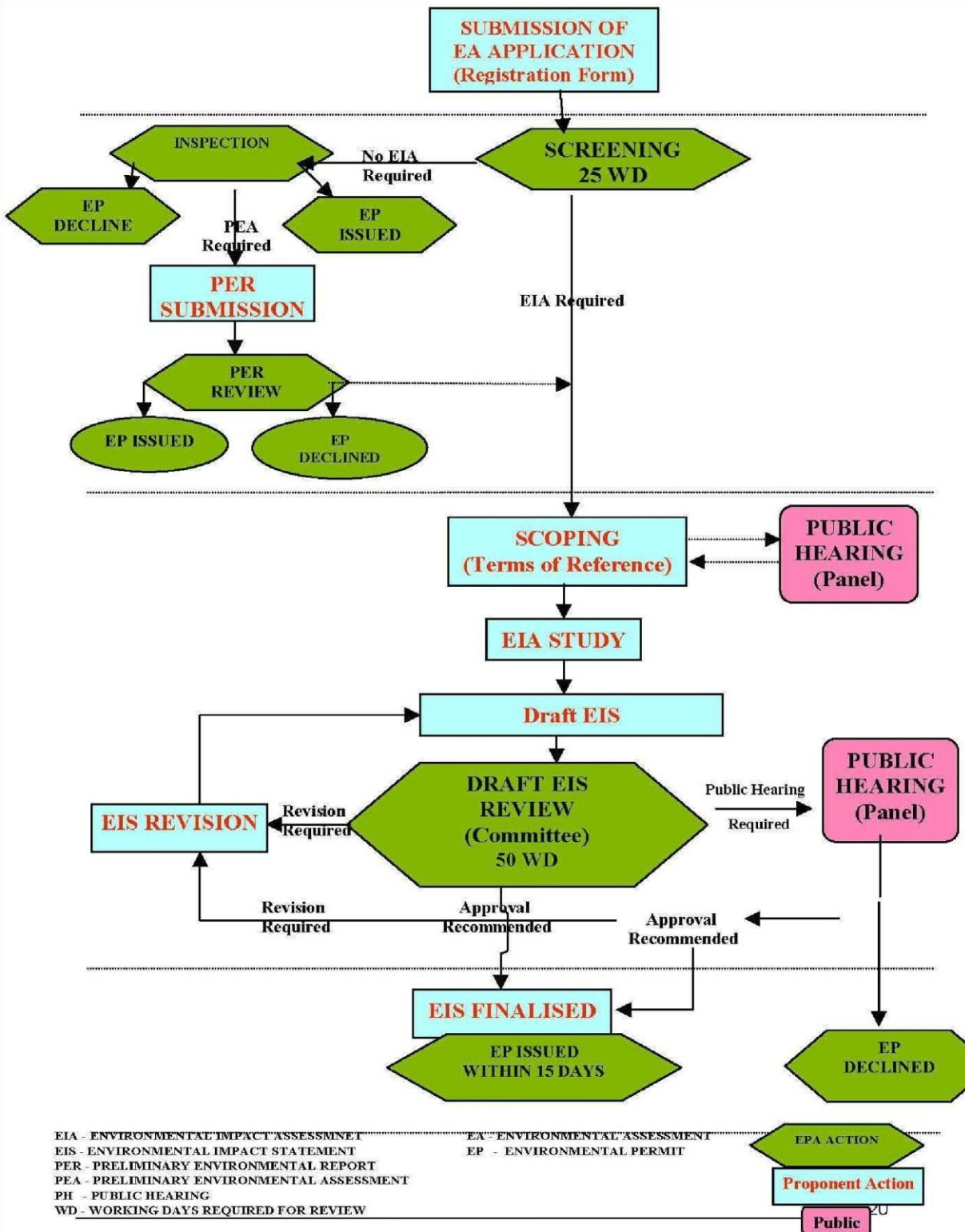
9. Consultation Notes: Meeting with Representatives of Ghana Cooperative Fashion Designers Association (GCFDA) – Ghana TVET Voucher Project on 21st February, 2019 on JSP ESMF Preparation.

Attendance			
<i>Name</i>	<i>Designation</i>	<i>Contact</i>	<i>Email</i>
Judith Amponsah Budu	Training Coordinator	0206267230	j.m@gmail.com
Leticia Ogehmlé Soli	Participant CBT (MCP)	0243833581	ogehmlés@gmail.com
Rosemarie Mensh - Sampson	National Training Coordinator	0244970403	boafoyirenkyi@gmail.com
Isaac Dwomoh Boaten	Ghana TVET Voucher Program	0540832263	isboat@hotmail.com
Abdul-Rahim Abdulai	Safeguards Consultant	0245544143	mingo8876@gmail.com
<i>Main Issues Discussed</i>			
<i>Issue/Question</i>	<i>Response</i>		
Trade Areas	Garment/Tailoring/Dressmaking		

Details of Training	<p>Main Courses: English, Maths, Science, ICT, Interpersonal Relations, Entrepreneurship</p> <p>Other Courses: Safety at Work, Basic Design and Body Measurements</p> <p>Details of Safety at Work: Proper use of fire extinguisher, use of professionals for electrical works, ventilation at structures of work, conservation of electricity, use of protective clothing.</p>	
Environment and Social Impacts and Mitigation Measures	Impacts	Mitigation
	<ol style="list-style-type: none"> 1. Skills development of MCPs, workers and apprentices 2. Creation of better jobs 3. Increased income for training institutions 4. Additional skills of training coordinators 5. Generation of waste (Pieces of fabric and paper) 	Reuse of waste especially fabric for patch working, quilting, door mats, carrier bags, laptop covers, table clothes.
	Gender Issues	More females (60%) are in this trade area than males (40%), hence more females on the project.
	Disability	<ol style="list-style-type: none"> 1. Training institutions are supposed to be disability friendly before they are certified by COTVET to run a training programme. 2. Disabled MCPs and Apprentices are given an extra amount for motivation. 3. There is no deliberate attempt to involve disability associations in the training of disabled participants (especially Blind and Deaf Associations)
	Citizens Engagement	It has been a key instrument for the GCFDA. They meet periodically (weekly for societal level, quarterly for regional and national levels) to discuss
		pertinent issues of the association.
Grievance Redress Mechanism	<p>There is no official GRM in operation. However, issues from the training are being reported to and handled by the Training Coordinators (TCs) and Trade Associations. Where they are not able to handle these cases, they report to the Voucher Officers at the Project Office.</p> <p>Examples of some complaints have to do with some Training Institutions (TIs) pilfering some consumables meant for the trainees. Some Tis also refuse to perform fire drills on their premises.</p> <p>Any GRM should build upon the existing adhoc one explained above.</p>	
Openness and Accountability	The project has adopted the use of tablets for the Training Coordinators to report live to the project office.	
Recommendations	The Project should liaise with disability associations for effective training of corresponding disabled persons.	



Appendix B: Administrative Flowchart for Ghana ESIA Procedures



Appendix C: Institutional Assessment for Environmental and Social Safeguards

No	Aspects	Criteria	NBSSI
1	Operational Structure and Staff Organogram	<i>Safeguard (SG) role explicit in organizational structure (Attach Organogram)</i>	No.
		<i>Adequacy of staff compared to geographic area of jurisdiction</i>	No
2	Budgetary Resources and Inventory	<i>Budget allocation for safeguards administration</i>	Yes (Through OSH Trainings)
		<i>Vehicles and equipment for monitoring</i>	No
		<i>Ostentatious or modest and fit for purpose office accommodation.</i>	No
3	Relevant Skills and Experience	<i>Competence for scoping environmental and social risks, selecting appropriate safeguards instruments, drafting TORs, procuring consultant services)</i>	No
		<i>Sufficient technical competency of good international industry practice)</i>	No
		<i>Practical experience in prescribing ESS requirements in contractor bidding documents, evaluating bids, determining whether contractors have assigned sufficient resources in ESS assessment and management.</i>	No
		<i>Practical experience to monitor, assess and supervise work of contractors in the field.</i>	No
		<i>IA control over contractors and other parties in the project (e.g Suspension of works, withhold payments and cancel contracts)</i>	No
4	Adaptive Management	<i>Adaptive management system in place when monitoring/supervision detects unacceptable performance.</i>	No
5	Stakeholder Engagement, Grievance Redress and Disclosure of Information.	<i>Extent of stakeholder engagement on an informed and on-going basis</i>	High
		<i>Expertise in Stakeholder Engagement (Sociologists/anthropologists)</i>	Yes (Medium)
		<i>Availability of grievance redress mechanism (Include management structure)</i>	Yes
		<i>Grievance redress (dedicated staff with expertise and experience)</i>	No
		<i>Environmental and social information disclosure to stakeholders at all levels.</i>	No
No	Aspects	Criteria	MoF
1		<i>Safeguard (SG) role explicit in organizational structure (Attach Organogram)</i>	No

	Operational Structure and Staff Organogram	<i>Adequacy of staff compared to geographic area of jurisdiction</i>	No
2	Budgetary Resources and Inventory	<i>Budget allocation for safeguards administration</i>	No
		<i>Vehicles and equipment for monitoring</i>	No
		<i>Ostentatious or modest and fit for purpose office accommodation.</i>	No
3	Relevant Skills and Experience	<i>Competence for scoping environmental and social risks, selecting appropriate safeguards instruments, drafting TORs, procuring consultant services)</i>	No
		<i>Sufficient technical competency of good international industry practice)</i>	No
		<i>Practical experience in prescribing ESS requirements in contractor bidding documents, evaluating bids, determining whether contractors have assigned sufficient resources in ESS assessment and management.</i>	No
		<i>Practical experience to monitor, assess and supervise work of contractors in the field.</i>	No
		<i>IA control over contractors and other parties in the project (e.g Suspension of works, withhold payments and cancel contracts)</i>	No
4	Adaptive Management	<i>Adaptive management system in place when monitoring/supervision detects unacceptable performance.</i>	No
5	Stakeholder Engagement, Grievance Redress and Disclosure of Information.	<i>Extent of stakeholder engagement on an informed and on-going basis</i>	Yes
		<i>Expertise in Stakeholder Engagement (Sociologists/anthropologists)</i>	Yes
		<i>Availability of grievance redress mechanism (Include management structure)</i>	No
		<i>Grievance redress (dedicated staff with expertise and experience)</i>	No
		<i>Environmental and social information disclosure to stakeholders at all levels.</i>	No

No	Aspects	Criteria	MELR
1.	Operational Structure and Staff Organogram	<i>Safeguard (SG) role explicit in organizational structure (Attach Organogram)</i>	No (But the Department of Factories Inspectorate per provisions of Labour Act is in charge of conditions of work.
		<i>Adequacy of staff compared to geographic area of jurisdiction</i>	No (Only 8 Regional Offices and 64 District Offices)
2.	Budgetary Resources and Inventory	<i>Budget allocation for safeguards administration</i>	Yes (Low)
		<i>Vehicles and equipment for monitoring</i>	No
		<i>Ostentatious or modest and fit for purpose office accommodation.</i>	Yes
3	Relevant Skills and Experience	<i>Competence for scoping environmental and social risks, selecting appropriate safeguards instruments, drafting TORs, procuring consultant services)</i>	No
		<i>Sufficient technical competency of good international industry practice)</i>	No
		<i>Practical experience in prescribing ESS requirements in contractor bidding documents, evaluating bids, determining whether contractors have assigned sufficient resources in ESS assessment and management.</i>	No
		<i>Practical experience to monitor, assess and supervise work of contractors in the field.</i>	No
		<i>IA control over contractors and other parties in the project (e.g Suspension of works, withhold payments and cancel contracts)</i>	No
4	Adaptive Management	<i>Adaptive management system in place when monitoring/supervision detects unacceptable performance.</i>	No
5	Stakeholder Engagement, Grievance Redress and	<i>Extent of stakeholder engagement on an informed and on-going basis</i>	Yes
		<i>Expertise in Stakeholder Engagement (Sociologists/anthropologists)</i>	Yes

	Disclosure of Information.	<i>Availability of grievance redress mechanism (Include management structure)</i>	Yes.....Labour offices across the nation
		<i>Grievance redress (dedicated staff with expertise and experience)</i>	Yes
		<i>Environmental and social information disclosure to stakeholders at all levels.</i>	No
No	Aspects	Criteria	MoE
1.	Operational Structure and Staff Organogram	<i>Safeguard (SG) role explicit in organizational structure (Attach Organogram)</i>	Yes (Environment Officer and Safeguards Consultant for the Development Project) Skills
		<i>Adequacy of staff compared to geographic area of jurisdiction</i>	Medium
2.	Budgetary Resources and Inventory	<i>Budget allocation for safeguards administration</i>	Yes....and High
		<i>Vehicles and equipment for monitoring</i>	Yes
		<i>Ostentatious or modest and fit for purpose office accommodation.</i>	Yes
3	Relevant Skills and Experience	<i>Competence for scoping environmental and social risks, selecting appropriate safeguards instruments, drafting TORs, procuring consultant services)</i>	Yes
		<i>Sufficient technical competency of good international industry practice)</i>	Yes
		<i>Practical experience in prescribing ESS requirements in contractor bidding documents, evaluating bids, determining whether contractors have assigned sufficient resources in ESS assessment and management.</i>	Yes
		<i>Practical experience to monitor, assess and supervise work of contractors in the field.</i>	Yes
		<i>IA control over contractors and other parties in the project (e.g Suspension of works, withhold payments and cancel contracts)</i>	Yes

4	Adaptive Management	<i>Adaptive management system in place when monitoring/supervision detects unacceptable performance.</i>	Yes
5	Stakeholder Engagement, Grievance Redress and Disclosure of Information.	<i>Extent of stakeholder engagement on an informed and on-going basis</i>	Yes
		<i>Expertise in Stakeholder Engagement (Sociologists/anthropologists)</i>	Yes
		<i>Availability of grievance redress mechanism (Include management structure)</i>	Yes
		<i>Grievance redress (dedicated staff with expertise and experience)</i>	Yes
		<i>Environmental and social information disclosure to stakeholders at all levels.</i>	Yes

No	Aspects	Criteria	MESTI
1	Operational Structure and Staff Organogram	<i>Safeguard (SG) role explicit in organizational structure (Attach Organogram)</i>	EPA is one of the agents of MESTI and its capacity has been assessed.
		<i>Adequacy of staff compared to geographic area of jurisdiction</i>	--
2	Budgetary Resources and Inventory	<i>Budget allocation for safeguards administration</i>	-
		<i>Vehicles and equipment for monitoring</i>	-
		<i>Ostentatious or modest and fit for purpose office accommodation.</i>	-
3	Relevant Skills and Experience	<i>Competence for scoping environmental and social risks, selecting appropriate safeguards instruments, drafting TORs, procuring consultant services)</i>	-
		<i>Sufficient technical competency of good international industry practice)</i>	-

		<i>Practical experience in prescribing ESS requirements in contractor bidding documents, evaluating bids, determining whether contractors have assigned sufficient resources in ESS assessment and management.</i>	-
		<i>Practical experience to monitor, assess and supervise work of contractors in the field.</i>	-
		<i>IA control over contractors and other parties in the project (e.g Suspension of works, withhold payments and cancel contracts)</i>	-
4	Adaptive Management	<i>Adaptive management system in place when monitoring/supervision detects unacceptable performance.</i>	-
5	Stakeholder Engagement, Grievance Redress and Disclosure of Information.	<i>Extent of stakeholder engagement on an informed and on-going basis</i>	-
		<i>Expertise in Stakeholder Engagement (Sociologists/anthropologists)</i>	-
		<i>Availability of grievance redress mechanism (Include management structure)</i>	-
		<i>Grievance redress (dedicated staff with expertise and experience)</i>	-
		<i>Environmental and social information disclosure to stakeholders at all levels.</i>	-

No	Aspects	Criteria	COTVET
1	Operational Structure and Staff Organogram	<i>Safeguard (SG) role explicit in organizational structure (Attach Organogram)</i>	No
		<i>Adequacy of staff compared to geographic area of jurisdiction</i>	No
2	Budgetary Resources and Inventory	<i>Budget allocation for safeguards administration</i>	Yes (Training in Safety at Work Places)
		<i>Vehicles and equipment for monitoring</i>	No
		<i>Ostentatious or modest and fit for purpose office accommodation.</i>	No

3	Relevant Skills and Experience	Competence for scoping environmental and social risks, selecting appropriate safeguards instruments, drafting TORs, procuring consultant services)	No
		Sufficient technical competency of good international industry practice)	No
		Practical experience in prescribing ESS requirements in contractor bidding documents, evaluating bids, determining whether contractors have assigned sufficient resources in ESS assessment and management.	No
		Practical experience to monitor, assess and supervise work of contractors in the field.	No
		IA control over contractors and other parties in the project (e.g Suspension of works, withhold payments and cancel contracts)	No
4	Adaptive Management	Adaptive management system in place when monitoring/supervision detects unacceptable performance.	No
5	Stakeholder Engagement, Grievance Redress and Disclosure of Information.	Extent of stakeholder engagement on an informed and on-going basis	No
		Expertise in Stakeholder Engagement (Sociologists/anthropologists)	Yes
		Availability of grievance redress mechanism (Include management structure)	Yes
		Grievance redress (dedicated staff with expertise and experience)	Yes
		Environmental and social information disclosure to stakeholders at all levels.	No

Appendix D – Environmental and Social Screening Checklist

Environmental and Social Screening Form (ESSF)

JOB S and SKILLS

PROJECT

1. Project Information: Name and Contact Details:

Project Name	Location: (region/district/Community)		
	If other, explain:		
DA (District Engineer)		Date of Screening:	
Name of reviewer: (Regional Coordinator)		Date of Reviewing	
Name of Approver: National Safeguard Specialist		Date of Approval:	

2. Site Selection Data:

Attach Location Map

2. Physical Data:	Comments
(longitude – latitude coordinates (GPS reading) if available):	
Subproject Site area in ha	
Extension of or changes to existing land use	
Any existing property?	
Any plans for construction, movement of earth, changes in land cover	

3. Impact identification and classification:

When considering the location of the sub-project, rate the sensitivity of the proposed site in the following table according to the given criteria. Higher ratings do not necessarily mean that a site is unsuitable. They do indicate a real risk of causing undesirable adverse environmental and social effects, and that more substantial environmental and/or social planning may be required to adequately avoid, mitigate or manage potential effects. The following table should be used as a reference.

IMPACT IDENTIFICATION AND CLASSIFICATION

Issues	Site Sensitivity		
	Low	Medium	High
Natural habitats	No natural habitats present of any kind	No critical natural habitats; other natural habitats occur	Critical natural habitats present
Water quality and water resource availability and use	Water flows exceed any existing demand; low intensity of water use; potential water use conflicts expected to be low; no potential water quality issues	Medium intensity of water use; multiple water users; water quality issues are important	Intensive water use; multiple water users; potential for conflicts is high; water quality issues are important
Natural hazards vulnerability, floods, soil stability/erosion	Flat terrain; no potential stability/erosion problems; no known volcanic/seismic/flood risks	Medium slopes; some erosion potential; medium risks from volcanic/ seismic/ flood/ hurricanes	Mountainous terrain; steep slopes; unstable soils; high erosion potential; volcanic, seismic or flood risks
Cultural property	No known or suspected cultural heritage sites	Suspected cultural heritage sites; known heritage sites in broader area of influence	Known heritage sites in project area
Involuntary resettlement	Low population density; dispersed population; legal tenure is welldefined; well-defined water rights	Medium population density; mixed ownership and land tenure; well-defined water rights	High population density; major towns and villages; low-income families and/or illegal ownership of land; communal properties; unclear water rights
Land Tenure	No conflicts, disagreements around use of land,	Process of land regularization and rights to natural resources being worked out with clear communication and grievance process in place	Land conflicts historically unresolved, and no transparency or grievance redress available

4. Checklist of Environmental impacts

	Potential for Adverse Impacts					Remarks (Specify closest resource or site in question)
	None	Low	Med	High		
Wildlife habitats or populations disturbed						
Sensitive ecosystems downstream disrupted						
Environmentally sensitive areas disturbed						
Number of stream crossings or disturbances						
Existing water sources supply/yield depletion						
Existing water users disrupted						
Downstream water users disrupted						
Potential Soil erosion concerns (e.g., due to highly erodible soils or steep gradients)						
Potential flooding concerns						
Wet season excavation						
Creation of quarry sites or borrow pits						
Significant vegetation removal						
Solid or liquid waste generate						
Dust generation						
Noise generation						

Physical Cultural or religious sites disturbed					
Other (specify):					

5. Checklist of Social impacts

	Potential for Adverse Impacts				Remarks (Specify closest resource or site in question)
	None	Low	Med	High	
Land tenure issues on site/ Community					
Land acquisition concerns					
Resettlement					
Changes to livelihoods from land acquisition					
permanent or temporary loss of crops, fruit trees					
Impact on vulnerable (Women, children, etc.)					
Other (specify):					

6. Summary Impact Evaluation:

The summary of the impact identification and evaluation presented below is based on the screening findings under section 3, 4 and 5. The highest rating in all five areas will be chosen in all cases.

Summary of Site Sensitivity (Rate as Low/Medium/High for the site and provide comments)						
Site Characteristics	Natural habitats	Water quality and water resource availability and use	Natural hazards vulnerability, floods, soil stability/ erosion	Involuntary resettlement	Land Tenure	Comments
Evaluation Criteria: (None, Low, Medium & High)						

7. Categorization and Recommendations*

Determination of the environmental category is based on final evaluation findings under section 6 the screening checklist.

Tick as appropriate	Category	Rating	Recommendation
	A	High	Requires registration with the EPA and additional environmental or social instruments (ESMP, ESIA, ARAP, RAP, etc.) to support the ESMF/RPF
	B	Medium	Requires additional environmental or social instruments to support the ESMF/RPF. In case the sub-project is registered with EPA and no further documentation is required, the PIU would prepare a sitespecific Environmental and Social Management Plan Checklist (ESMP Checklist). Find attached ESMP Checklist (Appendix E)
	C	Low/None	Does not require additional environmental or social due diligence than what is provided in the ESMF/RPF. Refer to ESMF /RPF Sub-projects will however be registered with EPA in accordance with LI 1652

Approval's Name:

Signature:

Date:

Appendix E – Environmental and Social Management Plan Checklist

ESMP Checklist for Rehabilitation and Construction Sub-project Activities

General Guidelines for use of ESMP checklist:

The ESMP checklist-type format attempts to cover typical core mitigation approaches to civil works contracts with small, localized impacts. It is accepted that this format provides the key elements of an Environmental and Social Management Plan (ESMP) to meet World Bank Environmental Assessment requirements under OP 4.01. The intention of this checklist is that it would be applicable as guidelines for the small works

contractors and constitute an integral part of bidding documents for contractors carrying out small civil works under Bank-financed projects.

The checklist has three sections:

Part 1 includes a descriptive part that characterizes the project and specifies in terms the institutional and legislative aspects, the technical project content, the potential need for capacity building program and description of the public consultation process. This section could be up to two pages long. Attachments for additional information can be supplemented when needed.

Part 2 includes an environmental and social screening checklist, where activities and potential environmental issues can be checked in a simple Yes/No format. If any given activity/issue is triggered by checking “yes”, a reference is made to the appropriate section in the following table, which contains clearly formulated management and mitigation measures.

Part 3 represents the monitoring plan for activities during project construction and implementation. It retains the same format required for EMPs proposed under normal Bank requirements for Category B projects. It is the intent of this checklist that Part 2 and Part 3 be included into the bidding documents for contractors, priced during the bidding process and diligent implementation supervised during works execution.

CONTENTS

- A) General Project and Site Information
- B) Safeguards Information
- C) Mitigation Measures
- D) Monitoring Plan



73 **PART 1:**
GENERAL PROJECT AND SITE INFORMATION

INSTITUTIONAL & ADMINISTRATIVE				
Country				
Project title				
Scope of project and activity				
Institutional arrangements (Name and contacts)	WB (Project Team Leader)	Project Management	Local Counterpart and/or Recipient	
Implementation arrangements (Name and contacts)	Safeguard Supervision	Local Counterpart Supervision	Local Inspectorate Supervision	Contactor
SITE DESCRIPTION				
Name of site				
Describe site location				Attachment 1: Site Map []Y [] N
Who owns the land?				
Description of geographic, physical, biological, geological, hydrographic and socio-economic context				
Locations and distance for material sourcing, especially aggregates, water, stones?				
LEGISLATION				
Identify national & local legislation & permits that apply to project activity				
PUBLIC CONSULTATION				

Identify when / where the public consultation process took place	
INSTITUTIONAL CAPACITY BUILDING	
Will there be any capacity building?	<input type="checkbox"/> N or <input type="checkbox"/> Y if Yes, Attachment 2 includes the capacity building program

PART 2: SAFEGUARDS INFORMATION

ENVIRONMENTAL /SOCIAL SCREENING			
	Activity	Status	Triggered Actions
Will the site activity include/involve any of the following?	A. Rehabilitation	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section A below
	B. Minor new construction	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section A below
	C. Individual wastewater treatment system	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section B below
	D. Historic building(s) and districts	<input type="checkbox"/> Yes <input type="checkbox"/> No ??	See Section C below
	E. Acquisition of land ²	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section D below
	F. Hazardous or toxic materials ³	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section E below
	G. Impacts on forests and/or protected areas	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section F below
	H. Handling / management of medical waste	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section G below
	I. Traffic and Pedestrian Safety	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section H below

² Land acquisitions includes displacement of people, change of livelihood encroachment on private property this is to land that is purchased/transferred and affects people who are living and/or squatters and/or operate a business (kiosks) on land that is being acquired.

³ Toxic / hazardous material includes but is not limited to asbestos, toxic paints, noxious solvents, removal of lead paint, etc.

PART 3: MITIGATION MEASURES

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
0. General Conditions	Notification and Worker Safety	<ul style="list-style-type: none"> (a) The local construction and environment inspectorates and communities have been notified of upcoming activities (b) The public has been notified of the works through appropriate notification in the media and/or at publicly accessible sites (including the site of the works) (c) All legally required permits have been acquired for construction and/or rehabilitation (d) The Contractor formally agrees that all work will be carried out in a safe and disciplined manner designed to minimize impacts on neighboring residents and environment. (e) Workers' PPE will comply with international good practice (always hardhats, as needed masks and safety glasses, harnesses and safety boots) (f) Appropriate signposting of the sites will inform workers of key rules and regulations to follow.
A. General Rehabilitation and /or Construction Activities	Air Quality	<ul style="list-style-type: none"> (a) During interior demolition debris-chutes shall be used above the first floor (b) Demolition debris shall be kept in controlled area and sprayed with water mist to reduce debris dust (c) During pneumatic drilling/wall destruction dust shall be suppressed by ongoing water spraying and/or installing dust screen enclosures at site (d) The surrounding environment (side walks, roads) shall be kept free of debris to minimize dust (e) There will be no open burning of construction / waste material at the site (f) There will be no excessive idling of construction vehicles at sites
	Noise	<ul style="list-style-type: none"> (a) Construction noise will be limited to restricted times agreed to in the permit (b) During operations the engine covers of generators, air compressors and other powered mechanical equipment shall be closed, and equipment placed as far away from residential areas as possible
	Water Quality	<ul style="list-style-type: none"> (a) The site will establish appropriate erosion and sediment control measures such as e.g. hay bales and / or silt fences to prevent sediment from moving off site and causing excessive turbidity in nearby streams and rivers.
	Waste management	<ul style="list-style-type: none"> (a) Waste collection and disposal pathways and sites will be identified for all major waste types expected from demolition and construction activities. (b) Mineral construction and demolition wastes will be separated from general refuse, organic, liquid and chemical wastes by on-site sorting and stored in appropriate containers. (c) Construction waste will be collected and disposed properly by licensed collectors (d) The records of waste disposal will be maintained as proof for proper management as designed. (e) Whenever feasible the contractor will reuse and recycle appropriate and viable materials (except asbestos)

B. Individual wastewater treatment system	Water Quality	<ul style="list-style-type: none"> (a) The approach to handling sanitary wastes and wastewater from building sites (installation or reconstruction) must be approved by the local authorities (b) Before being discharged into receiving waters, effluents from individual wastewater systems must be treated in order to meet the minimal quality criteria set out by national guidelines on effluent quality and wastewater treatment (c) Monitoring of new wastewater systems (before/after) will be carried out (d) Construction vehicles and machinery will be washed only in designated areas where runoff will not pollute natural surface water bodies.
C. Historic building(s)	Cultural Heritage	<ul style="list-style-type: none"> (a) If the building is a designated historic structure, very close to such a structure, or located in a designated historic district, notification shall be made and approvals/permits be obtained from local authorities and all construction activities planned and carried out in line with local and national legislation. (b) It shall be ensured that provisions are put in place so that artifacts or other possible “chance finds” encountered in excavation or construction are noted and registered, responsible officials contacted, and works activities delayed or modified to account for such finds.

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
D. Acquisition of land	Land Acquisition Plan/Framework	<ul style="list-style-type: none"> (a) If expropriation of land was not expected but is required, or if loss of access to income of legal or illegal users of land was not expected but may occur, that the Bank’s Task Team Leader shall be (b) immediately consulted. The approved Land Acquisition Plan/Framework (if required by the project) will be implemented
E. Toxic Materials	Asbestos management	<ul style="list-style-type: none"> (a) If asbestos is located on the project site, it shall be marked clearly as hazardous material (b) When possible, the asbestos will be appropriately contained and sealed to minimize exposure (c) The asbestos prior to removal (if removal is necessary) will be treated with a wetting agent to minimize asbestos dust (d) Asbestos will be handled and disposed by skilled & experienced professionals (e) If asbestos material is to be stored temporarily, the wastes should be securely enclosed inside closed containments and marked appropriately. Security measures will be taken against unauthorized removal from the site. (f) The removed asbestos will not be reused
	Toxic / hazardous waste management	<ul style="list-style-type: none"> (a) Temporarily storage on site of all hazardous or toxic substances will be in safe containers labeled with details of composition, properties and handling information (b) The containers of hazardous substances shall be placed in an leak-proof container to prevent spillage and leaching (c) The wastes shall be transported by specially licensed carriers and disposed in a licensed facility. (d) Paints with toxic ingredients or solvents or lead-based paints will not be used

<p>F. Affected forests, wetlands and/or protected areas</p>	<p>Protection</p>	<p>(a) All recognized natural habitats, wetlands and protected areas in the immediate vicinity of the activity will not be damaged or exploited, all staff will be strictly prohibited from hunting, foraging, logging or other damaging activities.</p> <p>(b) A survey and an inventory shall be made of large trees in the vicinity of the construction activity, large trees shall be marked and cordoned off with fencing, their root system protected, and any damage to the trees avoided</p> <p>(c) Adjacent wetlands and streams shall be protected from construction site run-off with appropriate erosion and sediment control feature to include by not limited to hay bales and silt fences</p> <p>(d) There will be no unlicensed borrow pits, quarries or waste dumps in adjacent areas, especially not in protected areas.</p>
<p>G. Disposal of medical waste</p>	<p>Infrastructure for medical waste management</p>	<p>(a) In compliance with national regulations the contractor will insure that newly constructed and/or rehabilitated health care facilities include sufficient infrastructure for medical waste handling and disposal; this includes and not limited to:</p> <ul style="list-style-type: none"> ▪ Special facilities for segregated healthcare waste (including soiled instruments “sharps”, and human tissue or fluids) from other waste disposal; and ▪ Appropriate storage facilities for medical waste are in place; and ▪ If the activity includes facility-based treatment, appropriate disposal options are in place and operational
<p>H Traffic and Pedestrian Safety</p>	<p>Direct or indirect hazards to public traffic and pedestrians by construction activities</p>	<p>(b) In compliance with national regulations the contractor will insure that the construction site is properly secured and construction related traffic regulated. This includes but is not limited to</p> <ul style="list-style-type: none"> ▪ Signposting, warning signs, barriers and traffic diversions: site will be clearly visible and the public warned of all potential hazards ▪ Traffic management system and staff training, especially for site access and near-site heavy traffic. Provision of safe passages and crossings for pedestrians where construction traffic interferes. ▪ Adjustment of working hours to local traffic patterns, e.g. avoiding major transport activities during rush hours or times of livestock movement ▪ Active traffic management by trained and visible staff at the site, if required for safe and convenient passage for the public. ▪ Ensuring safe and continuous access to office facilities, shops and residences during renovation activities, if the buildings stay open for the public.

PART 4: MONITORING PLAN

Phase	What (Is the parameter to be monitored?)	Where (Is the parameter to be monitored?)	How (Is the parameter to be monitored?)	When (Define the frequency / or continuous?)	Why (Is the parameter being monitored?)	Cost (if not included in project budget)	Who (Is responsible for monitoring?)
During activity preparation							
During activity implementation							
During activity supervision							

Monthly Field Environmental Monitoring Checklist

Site location							
Name of contractor							
Name of supervisor							
Date of site visit							
Status of civil works							
Documents and activities to be examined	Status				Comments		
Contractor holds license for extraction of natural resources	Yes	Partially	No	N/A			

Contractor holds permit for operating concrete/asphalt plant					
Contractor holds agreement for final disposal of waste					
Contractor holds agreement with service provider for removal of household waste from site					
Work site is fenced and warning signs installed					
Works do not impede pedestrian access and motor traffic, or temporary alternative access is provided					
Working hours are observed					
Construction machinery and equipment is in standard technical condition (no excessive exhaust and noise, no leakage of fuels and lubricants)					
Construction materials and waste are transported under the covered hood					
Construction site is watered in case of excessively dusty works					
Contractor's camp or work base is fenced; sites for temporary storage of waste and for vehicle/equipment servicing are designated					
Contractor's camp is supplied with water and sanitation is provided					
Contractor's camp or work base is equipped with first medical aid and fire fighting kits					
Workers wear uniforms and protective gear adequate for technological processes (gloves, helmets, respirators, eye-glasses, etc.)					
Servicing and fuelling of vehicles and machinery is undertaken on an impermeable surface in a confined space which can contain operational and emergency spills					

Vehicles and machinery are washed away from natural water bodies in the way preventing direct discharge of runoff into the water bodies					
Construction waste is being disposed exclusively in the designated locations					
Extraction of natural construction material takes place strictly under conditions specified in the license					
Excess material and topsoil generated from soil excavation are stored separately and used for backfilling / site reinstatement as required					
Works taken on hold if chance find encountered and communication made to the State agencies responsible for cultural heritage preservation					
Upon completion of physical activity on site, the site and contractor's camp/base cleared of any remaining left-over from works and harmonized with surrounding landscape					

Appendix F: Sample Copy of EPA Registration Form (EA1)

ENVIRONMENTAL PROTECTION AGENCY, GHANA

ENVIRONMENTAL ASSESSMENT REGISTRATION FORM

(To be completed in Duplicate)

FEE: ₵50,000

Serial No.

FORM EA1

PROPONENT:

Address for correspondence:

Contact person:

Position:

Phone No.:

Fax No.:

Email:

ASSESSMENT NO:		FILE NO:	
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Environmental Protection Agency
P.O. Box M 326 Accra,
Ghana

Tel: 664697/8, 664223, 662465

Fax: 662690

Email: support@epagghana.org

Web.site: www.epa.gov.gh

*This form shall be submitted to the relevant EPA Regional Office. It is important that you read carefully the guide for completing the form before starting.

1. PROPOSED UNDERTAKEN/DEVELOPMENT

Title of proposal (General Classification of undertaking)

Description of Proposal (nature of undertaking, unit processes [flow diagram], raw materials, list of chemicals (source, types and quantities), storage facilities, wastes/ by-products (solid, liquid and gaseous)

Scope of Proposal (size of labour force, equipment and machinery, installed/production capacity, product type, area covered by facility/proposal, market)

2. PROPOSED SITE

Location (attach a site plan/map)

Plot/House No.

Street/Area
Name

Town

District/Region

Major Landmarks (if any) Current

zoning

Distance to nearest residential and/or other facilities

Adjacent land uses (existing & proposed)

Site description (immediate activities should be described)

3. INFRASTRUCTURE AND UTILITIES

Structures (buildings and other facilities proposed or existing on site)

Access to water (source, quantity)

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Access to power (type, source & quantity)

Drainage provision in the project area

Nearness to water body

Access to project site:

Other major utilities proposed or existing on site(e.g. sewerage, etc)

4. ENVIRONMENTAL IMPACTS

Potential environmental effects of proposed undertaking (Both constructional and operational phases)

5. OTHER ENVIRONMENTAL ISSUES

Potential significant risks and hazards associated with the proposal (including occupational health and safety). State briefly relevant environmental studies already done and attach copies as appropriate.

6. CONSULTATIONS 83

Views of immediate adjoining neighbours and relevant stakeholders (provide evidence of consultation)

7. MANAGEMENT OF IMPACTS AND ENVIRONMENTAL ENHANCEMENT MEASURES

ATTACHMENTS

Tick appropriate boxes below indicating that the following required documents have been attached:

- Authentic site plan (signed by a licensed surveyor and certified by Survey Dept.)
- Block plan of the site
- Photographs of the site
- Fire report from the Ghana National Fire Service
- Zoning letter from Town & Country Planning Department

DECLARATION:

I,, hereby declare that the information provided on this form is true to the best of my knowledge and shall provide any additional information that shall come to my notice in the course of processing this application. I also declare that information provided is true.

Signature

Date

* Use additional sheets where spaces provided in 3, 4 and 5 are inadequate.

Appendix G: Outline of Environment and Social Management Plan

An ESMP consists of the set of mitigation, monitoring, and institutional measures to be taken during implementation and operation of a project to eliminate adverse environmental and social risks and impacts, offset them, or reduce them to acceptable levels. The ESMP also includes the measures and actions needed to implement these measures. The Borrower will (a) identify the set of responses to potentially adverse impacts; (b) determine requirements for ensuring that those responses are made effectively and in a timely manner; and (c) describe the means for meeting those requirements. More specifically, the EMP includes the following components.

a. Mitigation

The EMP identifies feasible and cost-effective measures that may reduce potentially significant adverse environmental impacts to acceptable levels. The plan includes compensatory measures if mitigation measures are not feasible, cost-effective, or sufficient. Specifically, the EMP

- (a) identifies and summarizes all anticipated significant adverse environmental impacts (including those involving indigenous people or involuntary resettlement);
- (b) describes--with technical details--each mitigation measure, including the type of impact to which it relates and the conditions under which it is required (e.g., continuously or in the event of contingencies), together with designs, equipment descriptions, and operating procedures, as appropriate;
- (c) estimates any potential environmental impacts of these measures; and
- (d) provides linkage with any other mitigation plans (e.g., for involuntary resettlement, indigenous peoples, or cultural property) required for the project.

b. Monitoring

Environmental monitoring during project implementation provides information about key environmental aspects of the project, particularly the environmental impacts of the project and the effectiveness of mitigation measures. Such information enables the borrower and the Bank to evaluate the success of mitigation as part of project supervision, and allows corrective action to be taken when needed. Therefore, the EMP identifies monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed in

the EA report and the mitigation measures described in the EMP. Specifically, the monitoring section of the EMP provides (a) a specific description, and technical details, of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions; and (b) monitoring and reporting procedures to (i) ensure early detection of conditions that necessitate particular mitigation measures, and (ii) furnish information on the progress and results of mitigation.

c. Capacity Development and Training

To support timely and effective implementation of environmental project components and mitigation measures, the EMP draws on the EA's assessment of the existence, role, and capability of environmental units on site or at the agency and ministry level.³ If necessary, the EMP recommends the establishment or expansion of such units, and the training of staff, to allow implementation of EA recommendations. Specifically, the EMP provides a specific description of institutional arrangements--who is responsible for carrying out the mitigatory and monitoring measures (e.g., for operation, supervision, enforcement, monitoring of implementation, remedial action, financing, reporting, and staff training). To strengthen environmental management capability in the agencies responsible for implementation, most EMPs cover one or more of the following additional topics: (a) technical assistance programs, (b) procurement of equipment and supplies, and (c) organizational changes.

d. Implementation Schedule and Cost Estimates

For all three aspects (mitigation, monitoring, and capacity development), the EMP provides (a) an implementation schedule for measures that must be carried out as part of the project, showing phasing and coordination with overall project implementation plans; and (b) the capital and recurrent cost estimates and sources of funds for implementing the EMP. These figures are also integrated into the total project cost tables.

e. Integration of EMP with Project

The borrower's decision to proceed with a project, and the Bank's decision to support it, are predicated in part on the expectation that the EMP will be executed effectively. Consequently, the Bank expects the plan to be specific in its description of the individual mitigation and monitoring measures and its assignment of institutional responsibilities, and it must be integrated into the project's overall planning, design, budget, and implementation. Such integration is achieved by establishing the EMP within the project so that the plan will receive funding and supervision along with the other components.

