

GHANA COCOA BOARD



ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)

OCTOBER 25TH, 2018

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LIST OF ACRONYMS

AfDB	African Development Bank
CEA	Community Extension Agents
CHED	Cocoa Health and Extension Division
CMC	Cocoa Marketing Company
COCOBOD	Ghana Cocoa Board
CODAPEC	Cocoa Disease and Pest Control
CRIG	Cocoa Research Institute of Ghana
EPA	Environmental Protection Agency
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESRMP	Environmental and Social Risk Management Plan
OS	Operational Safeguard
PPE	Personal Protective Equipment
SEP	Stakeholder Engagement Plan
SPD	Seed Production Division
QCC	Quality Control Company
RM&E	Research Monitoring and Evaluation

1.0 INTRODUCTION

Ghana Cocoa Board, the statutory body responsible for Ghana's cocoa sector, has developed this Environmental and Social Management System (ESMS) based on AfDB requirement standards to identify and manage environmental and social risks and opportunities of its operations. This is to ensure sustainable management of our resources for economic development. This ESMS document has policies and procedures as well as operational manuals regarding COCOBOD's pre-harvest and post-harvest operations. Key documents available which form part of this ESMS include the following; Human Resource Policy Framework, Operational Policies and Procedures, Risk and Disaster Preparedness Plan and Occupational Health, Safety and Environment Policy.

1.1 Functions of COCOBOD

Ghana Cocoa Board (COCOBOD) was established in 1947 as the statutory public institution mandated to regulate the cocoa industry in Ghana. COCOBOD commands the administrative powers to formulate appropriate policies to facilitate the production, processing and marketing of cocoa, coffee and shea in the country.

The functions of COCOBOD include production, research, extension, internal and external marketing and quality control of cocoa. The functions are classified into two main sectors; Pre-harvest and Post-harvest which are performed by specialised subsidiaries and divisions.

The Pre-harvest Sector functions are performed by the Cocoa Research Institute of Ghana (CRIG), the Seed Production Division (SPD) and the Cocoa Health and Extension Division (CHED). These units deal with fundamental issues on actual cocoa production at the farm gate level. The Post-harvest Sector functions are undertaken by the Quality Control Company Limited (QCC) and the Cocoa Marketing Company (CMC) Limited. The Post-harvest activities of COCOBOD start with quality control measures which farmers must observe to facilitate the acceptance of their produce.

1.1.1 Applicability and Key Actors

COCOBOD, its subsidiaries and divisions, productivity enhancing programmes, projects and activities, contractors, services providers, consultants and parties associated with any of the operations of the Board must conform to this ESMS.

1.2 Purpose of the ESMS

The purpose of this ESMS is to provide a structured framework for identifying and managing potential environmental, social, health and safety risks, impacts and opportunities of all operations in the cocoa sector. Ghana Cocoa Board is conscious of the need to carry out its operations in a manner suitable to maintaining the biophysical integrity and socio-cultural conditions to the benefit of all concerned and affected in society. As such, this ESMS outlines the environmental and social risks along the cocoa value chain. It presents management approach to safeguarding the environment, health and safety of individuals and their communities.

The ESMS provides COCOBOD with the framework for continuous improvement in managing the effects of its operations on the environment and society. This performance is reviewed annually based on activities and operations in the cocoa value chain through a systematic 'Plan-Do-Check-Act' approach.

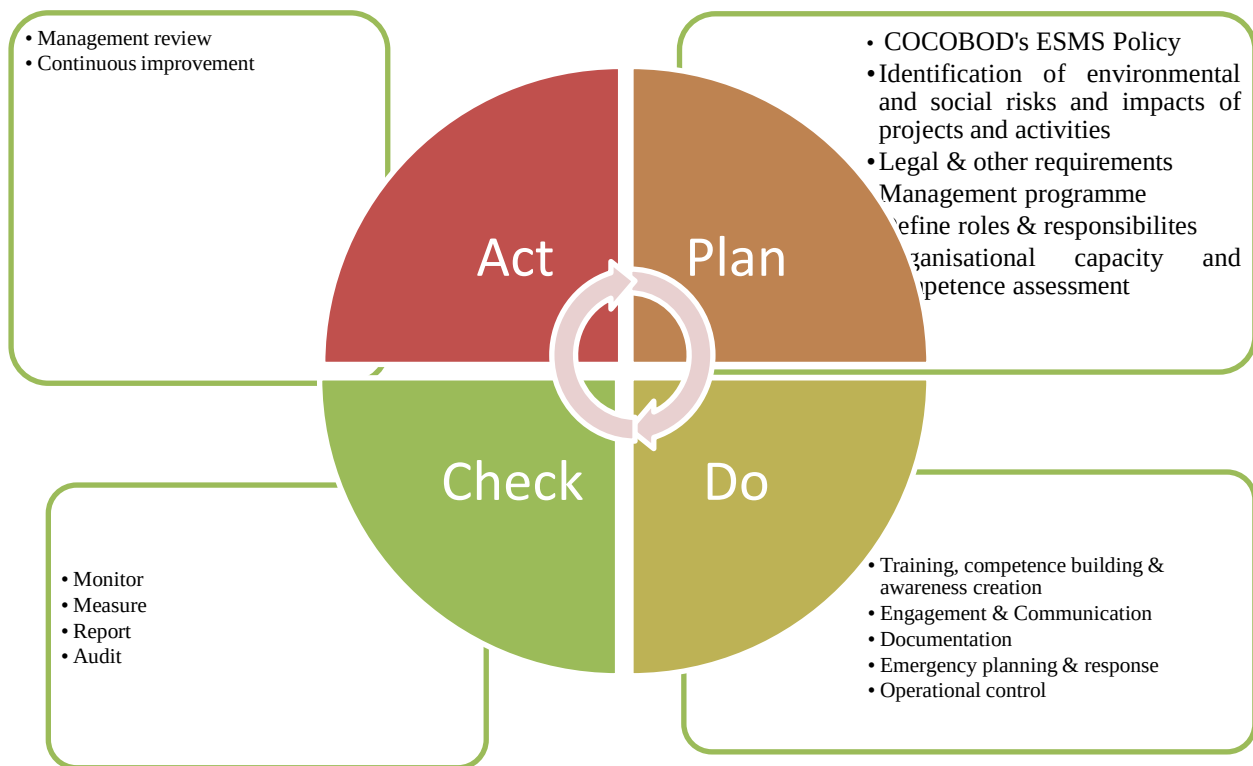


Figure 1: COCOBOD's Plan-Do-Check-Act approach

2.0 COMMITMENT

Globally, corporations are adopting sustainable practices which inculcate environmental, economic and social issues in their corporate strategy.

We at COCOBOD acknowledge that our vision ‘to create a modernized, resilient and competitive cocoa environment where all stakeholders strive towards a sustainable cocoa economy in which cocoa farmers and their communities thrive’, hinges on the design and implementation of an Environmental and Social Management System (ESMS). A system that is poised to ensure adherence to environmental and social protocols for a sustainable cocoa economy. It is our vision to ensure that the ESMS forms not only an integral part of our overall business strategy, but it also becomes a core part of the operations of our stakeholders in the cocoa value chain in Ghana.

COCOBOD is committed to adhere to this ESMS.

.....

HON. HACKMAN OWUSU-AGYEMANG
BOARD CHAIRMAN

.....

HON JOSEPH BOAHEN AIDOO
CHIEF EXECUTIVE

3.0 POLICY STATEMENT

The development of the ESMS is guided in general by the Cocoa Sector Development Strategy II (CSDS II) which seeks to emphasize on productivity enhancement through the empowerment of smallholder cocoa farmers to adopt modern technologies. It is also aimed at positioning the cocoa industry strategically to operate efficiently and effectively in a sustainable manner within a modern business environment.

In particular, it is guided by the Occupational Health, Safety and Environment Policy of COCOBOD which aims at protecting the health, safety and welfare of all staff and stakeholders, as well as, protecting the environment and local communities including farmers in conducting and developing its activities. It is also guided by the national laws of Ghana; AfDB Environmental and Social safeguards requirement standards; International Labour Organisation conventions and other relevant policies of the Global Environment.

Health, Safety and Environment performance are core values of the Ghana Cocoa Board and are managed as an integral part of its business to benefit employees and all stakeholders. As regulator, COCOBOD identifies the need to lead in demonstrating safety and environmental maintenance of the highest standards to serve as an example for stakeholders along the cocoa value chain. COCOBOD is committed to offering a safe and healthy environment for its employees, clients and sub-contractors. The intention is to manage them with the sensitivity it deserves and in a responsible manner.

The policy seeks to ensure that staff are accurately trained and provided with suitable safety and emergency gear. It promotes appropriate action taken to minimize hazards or modify conditions that endanger health, safety or the environment. It inculcates health, safety and environmental factors in operational planning, acquisition and construction of infrastructure while ensuring proper regulatory procedures are followed in the storage, management and disposal of chemicals used in the cocoa industry.

The policy also advocates for the efficient use of energy in all COCOBOD activities and that staff comply with all health, safety and environmental procedures prescribed by the management of COCOBOD. Also, it ensures that staff and sub-contractors are provided with the adequate Personal Protective Equipment (PPE) and ensure that they are used in the dispensation of duties. The policy

further advocates for the insertion of health and safety clauses in all contracts entered into by COCOBOD.

The Occupational Health, Safety and Environmental Policy is guided by the following national and international laws;

1. Labour Act 2003, Act 651
2. Factories Offices and Shops Act 1970, Act 328
3. Environmental Protection Agency Act 1994, Act 490
4. Environmental Regulation Assessment 1999 LI 1652
5. Environmental Regulation (Amendment) Assessment 2002 LI 1703
6. Fire Precautions (Premises) Regulations 2003 LI 1724
7. African Convention on the Preservation of Nature and Natural Resources (2017)
8. ILO Convention 182 on the Worst Forms of Child Labour (1999)
9. ILO Convention 155 on Occupational Safety and Health (1985)
10. ILO Convention 184 on Safety and Health in Agriculture (2001)

3.1 Vision and Mission

3.1.1 Vision

Create a modernized, resilient and competitive cocoa environment where all stakeholders strive towards a sustainable cocoa economy in which cocoa farmers and their communities thrive.

3.1.2 Mission

To encourage and facilitate the production, processing and marketing of premium quality cocoa, coffee and sheanut in all forms in the most efficient and cost effective manner and maintain the best industrial relations with its workers and develop its human resource.

COCOBOD pursues the goals of reduction of environmental impact of its operations and of compliance to environmental and social laws and regulations by all stakeholders along the cocoa value chain.

4.0 IDENTIFICATION OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

COCOBOD recognises the impact of environmental, social, and human health and safety risks in its operations and categorized them as production risks, marketing and economic factor risks and administrative facilitation risks. This section describes the various processes, tools and approaches to be deployed by COCOBOD as it identifies, evaluates, and manages risks in its internal operations as well as activities in its operations; thus ensuring good environmental and social performance standards and sustainability of its interventions.

4.1 Risks Assessment and Impact Identification

Key production risks include accidents and staff safety, land tenure issues, pests and diseases, opposition to programmes, use of unapproved chemicals, drought/ dry spell, storms and stormy rains, deforestation, illegal mining, urbanization, bush fires, wild fires and floods and declining soil fertility, child labour issues and labour exodus from cocoa growing areas.

The marketing and economic factor risks include volatility in cocoa pricing, input pricing, counterparty risk, exchange rate risk, interest rate, smuggling / illegal cross border trade and logistics breakdown/ congestion.

Lastly, the Administrative facilitation risks include equipment, machinery and vehicle risks, misappropriation of funds, operational premises risks, market regulation risks (social, environment, quality, residue levels, etc.) and policy risks (input policy, domestic processing policy, cocoa sourcing policy, land use policy, infrastructure policy, etc.)

COCOBOD staff and sub-contractors responsible for project monitoring and visits could be exposed to health and safety hazards, and threats from unresolved grievances from communities and persons within the project area.

Risks associated with COCOBOD's pre-harvest activities are falling of pollens into the eyes of pollination workers, falls of branches while pruning, slipping on the ground, side effect of chemicals used, coming into contact with snakes and other dangerous animals, lack of or poor use of personal protective equipment (PPE), improper management of pruners, chainsaw machine and other devices used.

As regards to construction of warehouses, processing factories and boreholes, identified risks include electric shocks, slips, trips and falls from height, fire outbreak, poor security, improper management of heavy equipment and machinery, hand and power tools.

COCOBOD's approach to addressing these risks include the following:

1. Develop an Occupational, Health, Safety and Environment policy and procedures manual.
2. Implement relevant policies enshrined in COCOBOD's Human Resource Policy Manual
3. Require staff, sub-contractors, service providers and other stakeholders are aware of key risks, and actions to take in such cases.
4. Develop a stakeholder engagement plan taking on board the views of all stakeholders including persons affected by the project.
5. Establish a grievance and redress mechanism for addressing external grievances.
6. Implement the existing emergency preparedness and response plan to handle emergency situations within offices and project locations when they arise.
7. Develop continuous training and education for all staff and partners on good environmental and social, health and safety management best practice at the workplace and in the field.

4.2 Anticipated Positive Impacts

The anticipated benefits that will accrue as a result of COCOBOD's operations include:

- (I) Increase in direct and indirect employment opportunities and consequently household benefits;
- (II) Enhance the role of the private sector in Community Service Centers and input delivery to farmers
- (III) Potential to increase cocoa productivity and sustain cocoa production
- (IV) Enhance Climate-Smart Cocoa production to mitigate the effects of climate change
- (V) Facilitate the formation of farmer co-operatives
- (VI) Increase and improve warehousing capacity
- (VII) Promote domestic cocoa processing

- (VIII) Promote local consumption and boosting the health of the populace.
- (IX) Improve livelihoods of cocoa farmers and other stakeholders.
- (X) Promote trade activities which will further increase access to goods, services, technologies and knowledge.

5.0 APPLICABLE REQUIREMENTS

COCOBODs ESMS is developed on the foundation of various laws in the country some of which have been identified and highlighted below.

5.1 Environmental and Social Assessment

COCOBOD seeks to identify and evaluate the environmental and social risks of its activities. It also looks to adopt mitigating measures that would anticipate and avoid, minimize, and where residual impacts still remain, compensate affected individuals and the communities. COCOBOD will also institute measures that allow for the engagement of affected communities throughout the project cycle and respond to grievances.

Legal guidance for achieving these set objectives are enshrined in the following laws and regulations:

The 1992 constitution of Ghana: The constitution of Ghana, being the supreme law of the land, holds within itself the foundations for the preservation of human rights, health and safety of labour and the general public. It also embodies environmental safeguards. These form the foundation of the ESMS.

The Environmental Protection Agency Act (490), 1994: The identification of the Environmental Protection Agency (EPA) as a stakeholder in the cocoa industry, provides that the EPA Act be complied. The EPA has oversight on the enforcement and enactment of regulations for environmental protection and ensuring the commitment of institutions whose activities are likely to have an impact on the environment.

The Environmental Assessment Regulations 1999, as Amended (2002): The environmental assessment regulations requires institutions to register and conduct Environmental Social Impact Assessment (ESIA) for proposed projects. This is to ensure that environmental impacts are duly addressed before activities commence.

African Convention on the Preservation of Nature and Natural Resources (2017).

The objectives of the convention is to enhance environmental protection, foster the conservation of sustainable use of natural resources and to harmonize and coordinate policies in the fields of environmental protection and sustainable use of natural resources.

5.2 Involuntary Resettlement

Resettlement is considered involuntary when the project-affected people are not in a position to refuse the activities that result in their physical or economic displacement. COCOBOD will seek to improve, or restore, the livelihoods and standards of living of physically displaced persons. This is will be done in accordance with:

Town and Country planning 1958, (Act 30): Seeks to promote sustainable human settlements development based on principles of efficiency, orderliness, safety and healthy growth of communities.

Lands Commission Act 767 (2008): This act integrates four of the public sector agencies (survey and mapping division, land registration division, land valuation division and public and vested lands management division) to secure efficiency and effectiveness in land administration.

Land Title Registration Act 1986, PNDL 152 and Regulations 1986 LI 1341: It is to provide a machinery for the registration of title to land and interests in land. Title Registration has two fold purpose, first to give certainty and facilitate proof of title. Secondly, to render dealings in land simple, safe and cheap as well as prevent fraud.

Ghana Land Policy of 1999: The key objectives of the Land Policy, which are relevant to the sub-activities identified are the protection of the rights of landowners to receive adequate compensation for land acquired, the promotion of public awareness of the proposed project and their legal rights at all levels, and community participation in sustainable land management

5.3 Biodiversity and Ecosystem Services

COCOBOD will comply and promote efforts aimed at conservation of biodiversity and ecosystem integrity in its ESMS in accordance with;

Forest and Wildlife Policy (1994): Manage and enhance forests and wildlife resources in Ghana for environmental protection and sustainable production.

Ghana Land Policy of 1999: These guidelines are aimed at enhancing conservation and environmental quality, thereby preserving options for present and future generations.

5.4 Pollution Prevention and Control, Greenhouse Gases, Hazardous Materials and Resource Efficiency

COCOBODs ESMS will ensure the management and reduction in pollutants resulting from the projects and activities so that they do not pose harmful risks to human health and the environment. This will be guided by:

Environmental Protection Agency Act, 1994, Act 490: Responsible under section 2(f) of EPA Act 1994 for the issuance of environmental permits and pollution abatement notices for controlling noise, waste discharges, emissions, deposits or other sources of pollutants.

Pesticides Control and Management Act, Act 528, 1996: The act specifies the regulation and use of pesticides that ensure the importation/production, sale and use of approved chemicals.

5.5 Labor Conditions, Health and Safety

The relevance of health, safety and labour conditions towards the objectives of the ESMS cannot be understated. To this end, COCOBOD will promote the fair treatment, nondiscrimination as well as establish, maintain, and improve the worker-management relationship. The ESMS will also ensure compliance with national employment and labor laws and promote safe and healthy working conditions of the workers while avoiding the use of forced and child labour. The guiding principles would be drawn from:

Labor Law, 2003 (Act 651): Relates to industrial relations, health safety and wellbeing of employees at work places. The labor law defines the processes for determination of fair compensation to employees for overtime work and determines the conditions under which industrial strikes can be embarked upon by workers. It also stipulates actions to be undertaken in the event of sexual harassment.

Other laws and regulations influencing the drafting of the ESMS include the following.

Workman Compensation Act 1987

COCOBOD recognizes that in the adverse, on site accidents are almost always unavoidable. The infusion of the Workman Compensation Act 1987 in the ESMS is to serve as a guide to mitigate incidence of on-the-job related injuries and accidents.

Fair Wages and Salaries Commission Act, Act 737 (2007)

To ensure fairness in the dissemination of wages by COCOBOD, its partners and sub-contractors, the ESMS is also guided by the Fair Wages and Salaries Commission Act, Act 737 (2007).

International Labour Organisation (ILO)

The agency is responsible for dealing with labour problems, particularly international labour standards, social protection, and work opportunities for all. As signatory to the ILO, organisations in Ghana are expected to operate within the conventions of the international body. COCOBODs ESMS identifies relevant ILO conventions in its ESMS.

Child Labour (ILO convention 182)

COCOBODs ESMS, in consideration of the need to adopt new instruments for the prohibition and elimination of the worst forms of child labour, as a priority for national and international action, including international cooperation and assistance, adheres vehemently to the ILO convention 182 on child labour.

6.0 ENVIRONMENTAL AND SOCIAL RISK MANAGEMENT PROCEDURES (ESRMP)

The implementation of Environmental and Social Risk Management Procedures set out COCOBOD's arrangements and processes along the cocoa value chain. This is aimed at supporting the implementation of COCOBOD's ESMS. These procedures describe how COCOBOD conducts its due diligence on its operations and projects. To ensure that identified and unidentified risks are detected and resolved, a set of environmental and social management procedures have been developed. These procedures are developed through screening for projects against the exclusion list, categorization of sub-projects based on identified risks, environmental and social risk appraisal, control and monitoring.

COCOBOD's ESRMP consists of three main parts as presented in Figure 2 below.

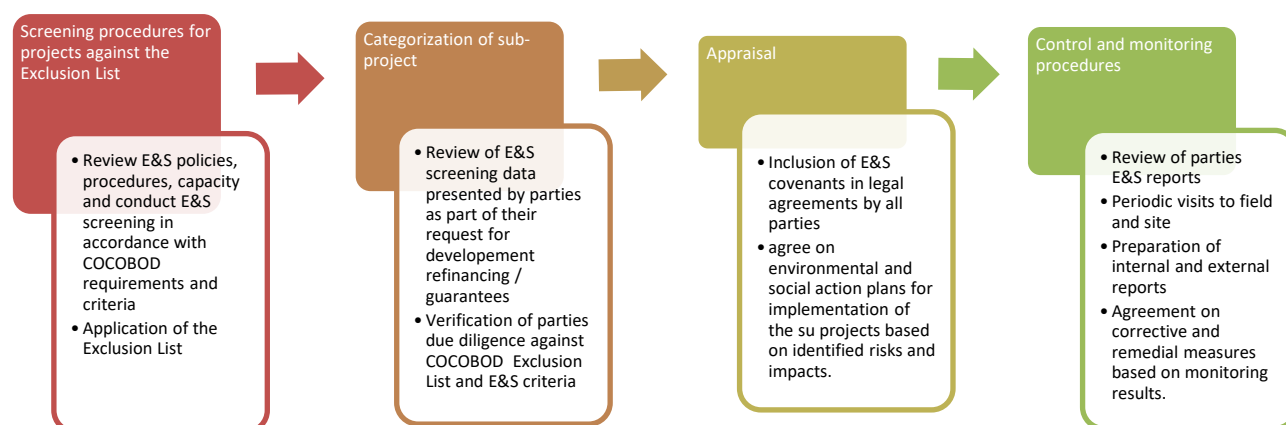


Figure 2: COCOBOD's ESMRP

6.1 Screening Procedure for Projects

Projects are screened against COCOBOD's exclusion list. This is reviewed by the ESMS Manager of COCOBOD.

COCOBOD's exclusion lists as outlined below is in conformity with the laws of Ghana.

- Production or trade in any product or activity deemed illegal under our laws or regulations or international conventions and agreements;
- Disputed properties.
- Production and activities involving harmful or exploitative forms of forced labor and/or child labor as defined by national regulations.

- Trade in radioactive materials, with the exception of medical materials and quality -control equipment where the radioactive source is trivial and adequately shielded;
- Production or trade in or use of unbounded asbestos fibers or other products with bonded asbestos as dominant material;
- Production or trade in pharmaceuticals, chemical compounds and other harmful substances subject to international phase-outs or bans, including pesticides classified as Class Ia (extremely hazardous), Ib (highly hazardous) or II (moderately hazardous);
- Production or trade of ozone-depleting substances subject to international phase-out;
- Trade in wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES);
- Purchase of logging equipment for use in unmanaged primary tropical rainforests.
- Activities which leads to significant conversion or degradation of sensitive and critical habitat
- Activities which leads to significant alteration, damage, or removal of any critical cultural heritage

10.2 Categorization of Sub-projects based on identified risk

All identified risks and their associated impacts in the operational activities of COCOBOD are categorized according to the following criteria:

- **High Risk** – projects that are likely to induce significant and/or irreversible adverse environmental and/or social impacts, or significantly affect environmental or social components that COCOBOD or its development and financial partners deem sensitive.
- **Medium Risk** – projects that are likely to have detrimental site-specific environmental and/or social impacts that are less adverse. Likely impacts shall be few in number, site specific, largely reversible and readily minimized by applying appropriate management and mitigation measures or incorporating internationally recognized design criteria and standards.
- **Low Risk** – projects that are not likely to directly or indirectly affect the environment adversely and are unlikely to induce adverse social impacts.

6.3 Environmental and Social Risk Appraisal Procedures

Environmental and Social Risk Appraisal procedures will include subcontractors conforming to all the policies of COCOBOD and fulfilling all legal and binding documentations such as (title deeds; certificates; licenses, permits) from all applicable regulatory agencies in Ghana. As regards to monitoring, verification and reporting, periodic field/site visits and assessment of activities shall be used to review and appraise all risks associated with the projects. This shall be done as follows:

- High risk projects - quarterly
- Medium risk projects - biannually
- Low risk projects - annually.

A technical review will be done with experts from COCOBOD and independent third-parties or both. A checklist of the procedures will be used to assess if the ESMP is adhered.

6.4 Environmental and Social Risk Control and Monitoring Procedures

Environmental and Social Risk Control and Monitoring Procedures are used to ensure compliance by farmers or sub-contractors to the national and applicable requirements of Development Partners and all applicable international requirement standards. These include compliance with national regulations in Ghana. COCOBOD's monitoring and reporting procedures will ensure compliance with all investment and undertakings with established parties for the planning and execution of projects, including existing ones based on identified risks. This will be done quarterly for high risk projects, biannually for medium risk and annually for low risk projects. It requires that third party contractors on the projects produce a self-monitoring report on a defined schedule following all inspections by regulatory bodies where applicable. Copies of the report must be submitted to COCOBOD's ESMS Secretariat for review.

In the implementation of the ESMS, project design decisions must be made taking into account the need to avoid, minimize and reduce negative environmental, socio-economic and health impacts, and the opportunity to enhance positive impacts. The Management Plans will be supplemented with additional requirements as detailed design and expertise portfolios. Contractors will be required to develop their working methods and procedures in accordance with the developed ESMP.

7.0 ORGANIZATIONAL CAPACITY, RESPONSIBILITY AND COMPETENCY

COCOBOD shall establish a functioning Coordination Unit to conduct environmental and social due diligence on all operations in achieving sustainability in the seven cocoa regions.

7.1 Strengthening and Capacity Building

The competence of COCOBOD staff to carry out their respective roles shall, to a large extent, determine the success of our activities.

7.1.1 Identification of Capacity Needs

The first step in pursuing capacity building is the identification of the capacity needs of the various stakeholders. Capacity building goes beyond training. Our human resource development includes the process of equipping individuals with the understanding, skills and access to information, knowledge and training that enables them to perform their roles. It also involves organizational development, the institution of relevant management structures, processes and procedures, not only within COCOBOD but also with other stakeholders in the cocoa sector.

COCOBOD shall build capacity of its relevant staff through education and training to ensure that the objectives of the ESMS are met. We shall ensure that our external parties have the requisite experience and skills to comply with our ESMS. The following training programmes will be undertaken:

Training programme 1

Content: AfDB Integrated Safeguard System, Operational Safeguards including ESMS, ESMP, RAP Implementation Requirements and Ghana EPA Environmental Assessment Regulations

Participants: ESMS Team (ESMS Unit, CEAs, DECAs, RECs and Regional Managers of CHED, QCC and SPD).

Training programme 2

Content: Training on ESMS, tools for screening, Categorization, Appraisal, Loan Covenants and ES Action Plans and Monitoring and Reporting.

Participants: ESMS Team (ESMS Unit, CEAs, DECAs, RECs and Regional Managers of CHED, QCC and SPD).

Training programme 3

Content: Training of Team members on specific tasks.

Participants: ESMS Team

The main recipients for training will be the Regional Managers, District Officers and Community Extension Agents. Their present capacities to successfully identify and implement environmental and social mitigation actions are limited. The training will be organized in collaboration with the regional EPAs and will be in the form of seminars and workshops. The training will include the dissemination of the ESMS document, Ghana EPA procedures and the AfDB policies on environment and social assessment. COCOBOD will also explore the possibility of having community environmental and social safeguard facilitators and train them.

The training and awareness creation will include annual events and the primary targets will be the CEAs. It is proposed that 3-day residential training programmes should be organised within a year at a central location. The content of the training will include a review of key environmental and social management activities and discussions on the ESMS. It is expected that participants will at the end of the training be in a position to deal more effectively with difficult environmental and social challenges that they may encounter.

7.1.2 Production of guidelines and tools

The ESMS provides guidelines to mitigate adverse environmental and social impacts arising out of COCOBOD operations. Training manuals and checklists are required to assist safeguard focal points to carry out their functions.

7.2 Roles and Responsibilities

The ESMS management structure is guided by the organizational structure of COCOBOD. The successful implementation of the ESMS requires a commitment from senior management to employees and sub-contractors. Sub-contractors will be required to develop their working methods and procedures in accordance with the developed ESMP. Within these structures, roles and responsibilities for the implementation of the framework will be defined. Key personnel responsible for implementing the ESMP are identified as follows; Chief Executive, Deputy Chief

Executive (Finance and Administration), ESMS Manager (Director -RM&E), ESMS Coordinator and ESMS Implementation Team. Figure 3 and Figure 4 below show COCOBOD's Organisational structure and Organisational structure of the ESMS.

Figure 3: COCOBOD's Organisational Structure

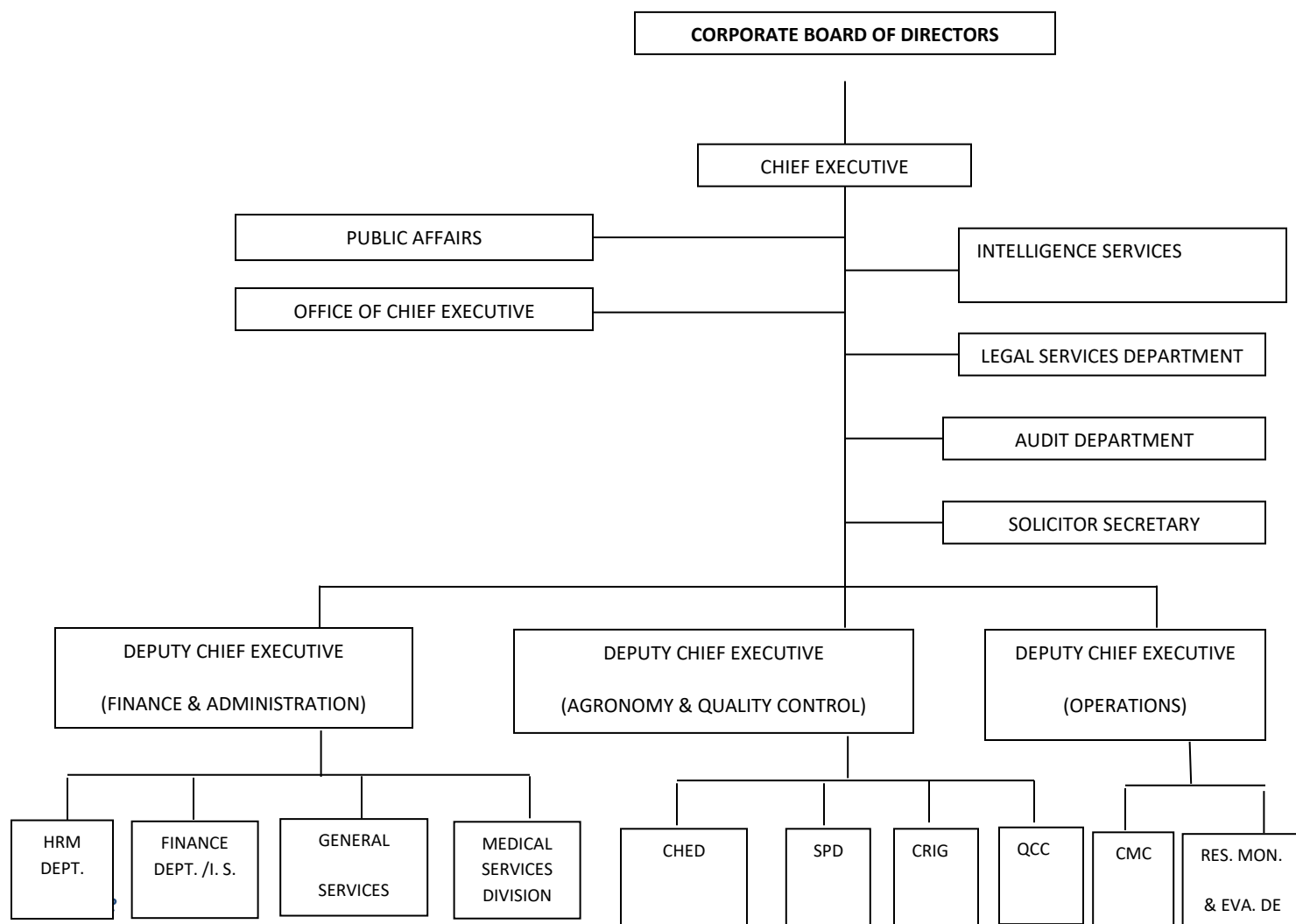
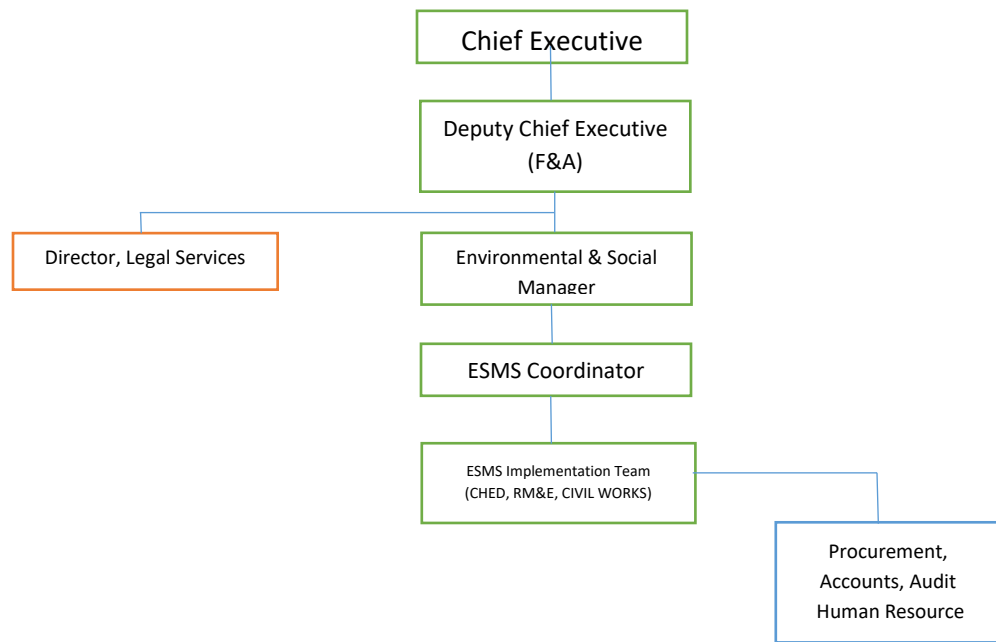


Figure 4: Organisational structure of the COCOBOD's ESMS



7.4 Roles and Responsibilities of Members of the ESMS Structure

7.4.1 Chief Executive

- Has the ultimate responsibility and authority for ensuring the good environmental, social, health and safety performance of the operations of COCOBOD
- Approval authority for Environmental, Social, Health and Safety Policy and Procedures and Training of COCOBOD
- Approves budget for ESMS implementation activities including training on best practices for COCOBOD staff on environmental and social performance.

7.4.2 Deputy Chief Executive (Finance and Administration)

- Ensures environmental, socially sound and gender inclusive project design and activities.
- Ensures occupational health and safety policies are effectively implemented.
- Supervises the ESMS implementation activities including training on environmental and social performance best practices for COCOBOD staff and sub-contractors.

7.4.3 Director Legal Services

- Responsible for loan covenants and agreements

7.4.4 Environmental and Social Management Systems Manager (Director-RM&E)

The ESMS Manager shall be the Director, Research, Monitoring and Evaluation Department and will;

- Have oversight responsibility for social and environmental issues, including the development and implementation of an Environmental and Social Policy and approaches for developing COCOBOD's ESMS.
- Ensure that technical experts are made available for effective environmental and social risk management.
- Review COCOBOD's HR policies to incorporate the relevant provisions of the ESMS.
- Provide leadership and technical direction during the implementation of the ESMS.
- Lead on the development of training manuals on environmental and social performance standards for projects and activities.
- Collaborate with procurement directorate and HR to ensure procurement documents and technical systems meet the ESMS framework.
- Ensure periodic review of the ESMS for continuous improvement.
- Report to AfDB on annual basis.

7.4.5 ESMS Coordinator

The ESMS Coordinator shall be a Technical Manager/ Environmental Expert at CHED who will ensure the implementation of the E&S Procedures resulting in the evaluation and due diligence documentation of environmental and social compliance. The ESMS Coordinator will:

- Ensure access to E&S risk management tools
- Schedule periodic staff training (internal, external, on-line) in the use and implementation of the E&S Risk Management Procedures.
- Provide oversight of sub-contractors' safety and health performance including review of contractors' monthly report, participation in safety meetings with site engineers/ field officers and sub-contractors
- Provide adequate documentation to allow reporting on the COCOBOD's environmental and social risk management performance.
- Prepare the required documentation on annual environmental and social performance.
- Lead on grievance redresses mechanism and procedures for the projects.

7.4.6 ESMS Implementation Staff

The ESMS implementation staff will be made up of CHED, RM&E, and Civil Works. In addition, staff from legal, finance, procurement and audit departments of COCOBOD as well as Seed Production Division and Cocoa Research Institute of Ghana (CRIG) will provide support. The implementation staff will be responsible for the day-to-day implementation of the ESMS. The implementation staff will;

- Play lead role in ensuring that issues of concern to women and other vulnerable groups are integrated into the project planning and implementation.
- Develop communication tools and strategies as part of the overall stakeholder engagement plan.
- Assist with planning and execution of public forums and preparation of public notices needed as part of communication channels for the general public.
- Track and report on environmental and social safeguard indicators.
- Ensure COCOBOD staff are oriented on environment, social, health and safety policy and procedures as well as labor and working conditions
- Coordinate with COCOBOD Human Resource to plan and train staff on the ESMS.

8.0 EMERGENCY PREPAREDNESS AND RESPONSE

Production/environmental risks identified are pests and diseases affecting current cocoa production and the development of new strains which, hitherto, were non-existent. To minimize the risk posed by diseases and pests, COCOBOD is implementing the mass spraying of cocoa farms against pests and diseases (CODAPEC Programme).

Extension agents using Motor bikes are to make sure they wear helmets and Personal Protective equipment. Medical care, insurance and compensation for staff are catered for by COCOBOD.

COCOBOD's response to disastrous conditions attributed to floods and stormy rains cannot be underestimated. To mitigate against risks posed by droughts, floods, and stormy rains, COCOBOD is supporting Cocoa Research Institute of Ghana, a subsidiary of COCOBOD, to develop drought-tolerant cocoa varieties for distribution to cocoa farmers. COCOBOD has also employed Extension Officers who advise cocoa farmers to farm on suitable land and also create fire belt around their farms.

Depleting soil fertility poses a significant threat to production. The bulk of cocoa is produced in the Western Region of Ghana, but unfortunately, the nature of soils there cannot sustain production in the long term. COCOBOD is, therefore, encouraging production in areas like Ashanti, Eastern, Central, Volta and Brong-Ahafo Regions where the soil types can sustain cocoa production. Besides, COCOBOD is providing cocoa farmers with fertilizers at subsidized prices to boost the fertility of the soils of existing farms.

Economic/marketing risks pose pricing challenges to the industry, with consequent impact on revenues to the farmer. The current bearish price trend of cocoa on the international market has contributed to serious loss of revenue to producing countries such as Ghana. In an unstable global and domestic economic environment, the entire supply chain could be affected.

COCOBOD is implementing the forward sales strategy to mitigate against economic/marketing risks. In order to mitigate the loss of farmer income, COCOBOD has established a stabilisation fund. An amount is set aside from the share of the net FOB into the fund when the price is good, and applied to cushion the farmer in times of low prices.

Any serious incidents that may occur as a result of COCOBOD's operations such as serious accidents, fire, fatal pollutions, etc. will be communicated to lenders within 72 hours.

9.0 STAKEHOLDER ENGAGEMENT

The Ghana cocoa industry is a multi-stakeholder industry. Stakeholder buy-in and cooperation is very crucial to the implementation of programmes and policies in the cocoa industry. The success of an initiative depends on COCOBOD's ability to satisfy concerns and interest of stakeholders from the design stage to the implementation of the project.

As regulator of Ghana's cocoa industry, a Stakeholder Engagement Plan (SEP) is, therefore, an important aspect of COCOBOD's ESMS to ensure successful implementation of all its projects.

COCOBOD's long standing relationship with its stakeholders which has been achieved through continuous dialogue is further enhanced with the development of a Stakeholder Engagement Plan. The guiding principle of our SEP is confidentiality, accessibility, transparency, cost effectiveness, mutual respect, consensus building, prompt response and a feedback mechanism. The SEP covers all projects being implemented by COCOBOD.

In recognition of the above, COCOBOD's Stakeholder Engagement Plan comprises stakeholder identification, engagement approaches, awareness creation, sensitization, external communication, grievance and redress mechanisms for affected communities.

Stakeholder identification has been carried out to identify the relevant stakeholders. This is aimed at communicating with them to know their concerns for the purpose of meeting their needs, addressing issues, resolving conflicts and achieving project objectives.

COCOBOD shall hold meetings with all stakeholders identified. This shall include roundtable meetings with specific stakeholders such as processing factories, agro-input suppliers, LBCs, NGOs, civil society organisations, development partners, and traditional authorities to get their buy-in and build consensus. Cocoa farmers and affected communities shall also be consulted through farmer durbars/rallies, town hall meetings, radio phone-in programmes to solicit their views and inputs from the design phase through to implementation.

The Public Affairs Department is currently being used to engage with external stakeholders. Subsequently, the revitalized Ghana Cocoa Platform (a public/private forum) shall be the forum to engage with external stakeholders

The following stakeholders have been identified through the conduct of a stakeholder analysis and their mode of engagement given in Table 1 below;

STAKEHOLDER	LEVEL	LEVEL OF ENGAGEMENT
Farmer Based Organizations	Primary	Sensitization, education, community development, executing agency
Members of affected communities	Primary	Sensitization, education, community development
Landowners	Primary	Sensitization, education, community development
Cocoa Farmers	Primary	Sensitization, education, community development
Forestry Commission	Secondary	Water resources planning and monitoring, construction, operations, and maintenance
Environmental Protection Agency	Secondary	Policy & planning/Supporting and monitoring the sector progress
Ghana Irrigation Authority	Secondary	Water resources planning and monitoring, construction, operations, and maintenance
Cocoa Hauliers	Secondary	Transport management and delivery
Traditional authorities	Secondary	Community engagement and Development, executing agency
Licensed Buying companies	Secondary	Planning and implementation
Agro input suppliers	Secondary	Planning and implementation
NGOs in the cocoa industry	Secondary	Donor, Community Development, executing agency
Civil Society Organizations	Secondary	Community Development, executing agency
National Disaster Management Organisation	Secondary	Planning and implementation
State Enterprises Commission	Tertiary	Policy & planning/Supporting and monitoring the sector progress
Ministry of Food and Agriculture (responsible ministry)	Tertiary	Policy & planning/Supporting and monitoring the sector progress
Ministry of Land and Natural Resources	Tertiary	Development, protection and conservation of water resources.
Ministry of Finance	Tertiary	Policy & planning/Supporting and monitoring the sector progress

Ministry of Employment and Labour Relations	Tertiary	Policy & planning/Supporting and monitoring the sector progress
Ministry of Trade and Industry	Tertiary	Utilisation, Policy & planning/Supporting and monitoring the sector progress
Ministry of Environment, Science, Technology and Innovation	Tertiary	Policy and Planning on environmental regulations
Ministry of Local Government and Rural Development	Tertiary	Facilitate local government interaction (MCE,DCE etc)
Ministry of Sanitation and Water Resources	Tertiary	Policy & planning/Supporting and monitoring the sector progress
Parliamentary Select Committee on Food and Agriculture	Tertiary	Legislations and regulations
Development partners	Tertiary	Donor, Community Development, executing agency

Table 1: Stakeholders and their level of engagement

9.1 External communication or sensitization of affected communities

COCOBOD will put in place an open channel of communication which will enable it to provide information about the projects and its potential impacts to the communities, as well as, receive their concerns. The guiding principle of the communication channel will be confidentiality, trust, transparency and continuous dialogue.

It will also offer the public the opportunity to give their views about the preferred methods, materials and schedule for future engagements. The channel of communication will also allow COCOBOD to give prompt feedback to the public on COCOBOD's response on their concerns.

The external communication mechanism will be updated and reviewed periodically and will follow best practices.

The ESMS Manager may be contacted at all times on environmental and social issues pertaining to the implementation of COCOBOD programmes.

- In person (Room 112, Cocoa House, 41 Kwame Nkrumah Avenue, Accra)
- Telephone (0302-678-979)
- By post (P. O. Box 933, Accra)
- Email (research.department@cocobod.gh)

9.2.1 Grievance and Redress Mechanism

A grievance and redress mechanism will be established under the principles of accessibility, effectiveness, transparency, independency and record maintenance. This will provide a means for affected individuals and communities to raise environmental and social concerns related to the projects to be implemented by COCOBOD and receive response in a timely manner. Communities in the cocoa growing regions and stakeholders will be informed of the existence of a grievance redress mechanism so that they may understand and utilize the procedures in the event of a complaint.

The grievance mechanism will be a four level process starting from Society level, District level, Regional level through to the Head office at the National level. Figure 3 shows the four level grievance redress mechanism

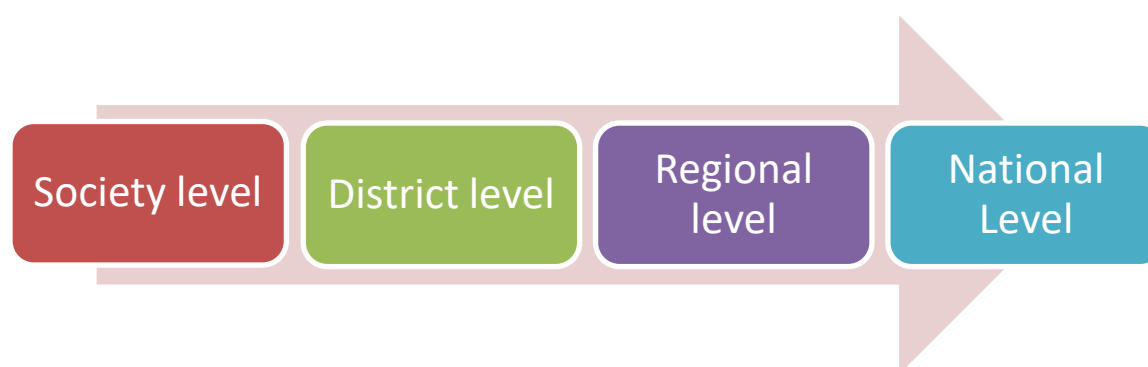


Figure 5: A four stage grievance mechanism

Composition of the ESMS grievance redress team at the various levels (Table 2)

Level	Composition
Society	• Community Extension Agent(Chairman) • Chief of the community or his representative • Chief Farmer • Leader/ Representative, Cocoa Farmers' Cooperative • Women's Representative • Leader, Youth in Cocoa Initiative • Assemblyman/ Unit Committee Chairperson
District	• District Cocoa officer (Chairman) • Traditional Council Rep. • District Chief Cocoa Farmer • LBC Rep. • District NADMO Coordinator
Regional	• Regional Manager, CHED (Chairman) • Traditional Council Rep. • Regional Chief Cocoa Farmer • LBC Rep. • Regional NADMO Coordinator

	• Regional EPA
National	• Chief Executive • ESMS Manager • National Chief Cocoa Farmer • NADMO • EPA

Table 2: ESMS grievance redress teams

Table 2: ESMS grievance redress teams

This mechanism will be publicized and will apply to all projects covered under the scope of the ESMS. A complaint can be submitted at the society level in several ways;

- In person (CEA)
- A dedicated telephone (0302-678-979)
- By post (P. O. Box 933, Accra)
- Email (research.department@cocobod.gh)

All formal complaints can also be sent to the ESMS Coordinator by email (esmscoordinator@cocobod.gh).

Received complaints will be registered on the complaint form by the receiving officer. Any complaint that is not resolved at that level will be forwarded to the next level for redress. A complaint shall be documented in a logbook/database. This will enable COCOBOD to monitor progress made towards resolving the concerns raised by the complainant.

A complaint form is attached as Appendix 3

9.2.3 Complaint review process

All complaints received having been registered, shall trigger a formal review and response process.

Upon receipt of a complaint, the Chairman of the committee at that level, within five working days, shall indicate to the complainant whether the request is eligible, through a consultation with other members of the committee.

If the complaint is eligible, the ESMS Committee shall investigate the issue and report within 14 working days. A detailed response including a confirmation that the complaint is valid and an action plan for addressing the complaint will be submitted to the ESMS Manager.

Feedback on reported grievances shall be channeled through face-to-face interactions, leaflets, radio, durbars/rallies, farmer business schools, emails, phone calls and letters.

10.0 RESOURCES AND CAPABILITIES

10.1 Technical and human Resource.

In achieving the aims of the ESMS, COCOBOD will make use of its vast human resource. COCOBOD will promote and devote resources towards the development of required institutional capacity through the effective training and development of staff to facilitate the implementation of the Environmental and Social policy as well as the Risk Management procedures. COCOBOD will also engage the services of stakeholders and consultants where need be to bolster institutional capacity and technical support.

10.2 Budget

The annual budget for the implementation of the ESMS is estimated at USD 512,000.00 to be used for monitoring and reporting, capacity building and stakeholder engagement.

11.0 DISCLOSURE, REPORTING AND MECHANISMS FOR THE ESMS REVIEW AND IMPROVEMENT

11.1 Disclosure

COCOBOD will disclose its Environmental and Social Policy on its website (www.cocobod.gh) for access by the general public.

11.2 Reporting and Mechanisms for the ESMS review and improvement

Information flow on the performance of our ESMP and an early warning mechanism is an important aspect of COCOBOD's ESMS. To this end, COCOBOD will put in place an internal environmental and social monitoring system which will ensure effective monitoring, reporting and review of the ESMP. It will also offer a new perspective as to how effectively the ESMS is performing. The Environmental and Social monitoring system will be incorporated into COCOBOD's existing monitoring and evaluation system. This is to ensure that Senior Management of COCOBOD is informed periodically on the performance of the ESMP. It will also ensure that any gaps in the ESMS or its compliance are identified, documented and corrected. The outcome of the monitoring exercise shall form the basis for a review and improvement of the ESMS. This system will monitor all aspects of the projects from the design to the implementation phase.

The environmental and social monitoring system shall be used to ensure that sub-contractors and service providers are complying with the provisions of COCOBOD's Environmental and Social Policy, exclusion list and applicable requirements as stipulated in the ESMS and national regulations

Project implementation will be monitored against mitigation measures outlined in the ESMP. This will ensure that measures spelt out in the ESMP are strictly adhered to and where there are any deficiencies, corrective measures will be taken. The process of monitoring will be facilitated through the use of templates and checklists which will be developed to identify and address instances of non-compliance.

The ESMS team will be responsible for managing the environmental and social monitoring system. COCOBOD may solicit the services of Technical Experts/Consultants where necessary. The monitoring exercise will be carried out through field and site visits, interviews and meetings. Figure 4 shows the reporting channel.

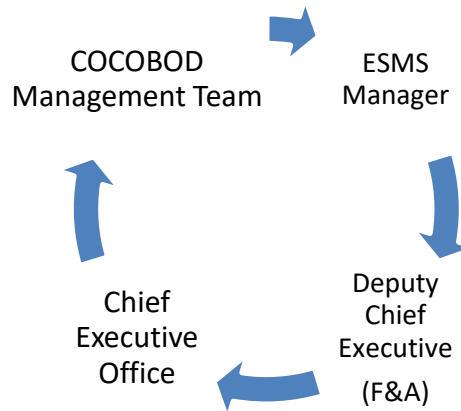


Figure 6: Channel of reporting

The ESMS Manager will forward monitoring reports submitted by the ESMS Coordinator to the the Deputy Chief Executive (F&A).

- ESMS Manager receives report and forwards to DCE (F&A)
- DCE F&A reports to the CE
- CE approves for necessary action to be taken by Management Team
- Management Team directs ESMS Manager to implement decision

11.4 Review of the ESMS

The amalgamation of ESMP reports, field/site visits, checklists recommendations, action plans among others, will determine the performance and effectiveness of the ESMS. Annual reviews of the system will be based on the findings from the monitoring mechanisms put in place under the ESMP.

Appendix 1

Screening and Categorization Checklist

Name of project:		
Project location:		
Does the project affect any of the Environmental and Social		
Environmental Checklist	Yes/No	Details/ Answer
Soils		
Fauna		
Water bodies		
Ecology		
Air Quality		
Acoustic Environment (noise)		
Usage of chemicals		
Flora (Deforestation)		
SOCIAL CHECKLIST		
Question		
Does the project involve change in land use?		
Have the properties been constructed in compliance with relevant national and local laws and regulations?		
Are people displaced as part of the activities of the projects?		
Will the project result in changing the present livelihoods of affected communities?		
Will the project provide employment and income prospects for affected communities?		

Is the project not affecting critical cultural heritage that are used as livelihoods by vulnerable and / or historically underserved traditional local communities?		
What AfDB risk category does the project fall in?		
High { }	Medium { }	Low { }
Which are the safeguard policies/laws triggered by the Project		
Indicate the exact safeguard policies /law		
AfDB Operational Safeguards below: <i>Environmental and social assessment (OS1)</i> <i>Involuntary Resettlement (OS2)</i> <i>Biodiversity and Ecosystem Services (OS3)</i> <i>Pollution Prevention and Control, Greenhouse Gases, Hazardous Materials and Resource Efficiency (OS4)</i> <i>Labour conditions, health and safety (OS5)</i>		
Ghana Laws and Regulations		
International Operating Policies/Laws on child labour		
Has the applicant obtained environmental permit?		
Yes { }	No { }	N/A { }
Provide details of permit if yes?		

Appendix 2

APPRAISAL FORM

This Environmental and Social Appraisal Form (ESAF) has been designed to assist in the evaluation of designed proposals and sub-projects for the all the productivity enhancing programme of COCOBOD. The ESAF contains information that will allow the ESMS Unit of COCOBOD to identify the characterization of the prevailing bio-physical and social environment with the aim to assess the potential project impacts on all its sub-projects. The ESAF will also identify potential socio-economic impacts that will require mitigation measures based on AfDB safeguards.

Project Application Number:

Name of subproject:

Location of subproject:

State the purpose for Field Appraisal:

Identify all the issues from the ESMS Checklist and determine the need for a Field Appraisal based on the sub-projects.

Date(s) of Field Appraisal:

Name and Address of Appraisal Manager:

Representative and Address:

- a) Project Manager of COCOBOD*
- b) Sub-Contractor(s)*

Description of the sub-projects and contracts

Sub-contractors must submit particulars that are not adequately stated in the documentation and design for the projects contracted on.

- a) Environmental and Social Issues: The entire screening and categorization checklist must be fulfilled.**

Field Appraisal Decision

The sub-contractor or subprojects shall be considered for approval solely after based on a site visit and consultations with both interested and affected communities, the field appraisal determined that the community and its proposed sub projects adequately address environmental and/or social issues as required by the COCOBOD ESMS and meets the requirements of Ghana Environment Protection Act and all the safeguards of AfDB.

Sub project preparation work

Where the appraisal identifies unaddressed environmental and/or social issues, the following have to be undertaken before further consideration of the application:

All required documentation such as an amended contract, ESMP, filled Screening and Categorization checklist form and designs of sub projects must be reviewed by senior management of the ESMS team before it is considered further.

NAME OF COCOBOD SENIOR MANAGER: .....

SIGNATURE:.....   DATE: .....

Appendix 3

GHANA COCOA BOARD

OFFICIAL COMPLAINT FORM

Date/Time / Location	Date: Time:	Location:
Details of Complainant:	Name: Age: Village/town:	Complaint should be anonymous
Alternative contact	I nominate the under listed to make the complaint on my behalf:	
Contact Method:	Telephone/ mobile number: Email Address: Postal Address: Personal interaction:	
Residential Location:	Please describe the physical location of your current residence:	
Attached Documents:	Please indicate any attaching documents to your complaint if any:	
Complaint:		
Signature:		