



Ministry of Tourism, Arts and Culture

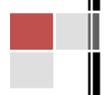
TOURISM SECTOR DEVELOPMENT PROJECT

Preparation of Environmental and Social Framework (ESMF)

FINAL REPORT

Submitted by

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LIST OF ACRONYMS

AfDB	African Development Bank
COSPE	Cooperazione per lo Sviluppo dei Paesi Emergenti
CSO	Civil Society Organisations
DRM	Dispute Resolution Mechanism
EAR	Environmental Assessment Regulations
EHSD	Environmental Health and Sanitation Directorate
EPA	Environmental Protection Agency
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental Safeguard Specialist
FC	Forestry Commission
FP	Focal Person
GHCT	Ghana Heritage Conservation Trust
GMMB	Ghana Museums and Monuments Board
GoG	Government of Ghana
GREET	Ghana Rural Ecotourism and Travel Office
GRM	Grievance Redress Mechanism
GTA	Ghana Tourism Authority
GWS	Ghana Wildlife Society
MDA	Ministries, Departments and Agencies
MLGRD	Ministry of Local Government and Rural Development
MLNR	Ministry of Lands and Natural Resources
MMDA	Metropolitan, Municipal and District Assemblies
MoTAC	Ministry of Tourism, Arts and Culture
NADMO	National Disaster Management Organization
NCRC	Nature Conservation Resource Centre
NGO	Non governmental organisation
PCU	Project Coordinating Unit
PCR	Physical Cultural resources
PPMED	Project Planning, Monitoring and Evaluation Directorate
PS	Project site
PSE	Private sector enterprises
RC	Ricerca e Cooperazione
RPF	Resettlement Policy Framework
SNV	Netherlands Development Organisation
SSS	Social Safeguard Specialist
SFP	Safeguard Focal Person
WB	World Bank
WD	Wildlife Division
WRC	Water Resources Commission

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Executive Summary

Project Brief Description

The Government of Ghana (GoG) has requested World Bank's assistance to prepare and implement a Tourism Sector Development Project. The Government seeks to promote the potentially transformative sectors for an accelerated and inclusive economic development agenda.

The objective of this assignment is to undertake a detailed Environmental and Social Management Framework (ESMF) focusing on key activities outlined under the project components. The ESMF sets out the principles, rules, guidelines, and procedures to assess the environmental and social risks and impacts and propose preventive and mitigation measures to enhance the sustainability of the project. In line with the World Bank's commitment to sustainable development, five Safeguards policies have been triggered to support the project development objectives. The policies include the Environmental Assessment (OP/BP 4.01), Natural Habitats (OP/BP 4.04), Physical Cultural Resources (OP/BP 4.11), Forests (OP/BP 4.36), and the Involuntary Resettlement (OP/BP 4.12).

The proposed project has four primary components:

(1) Strengthening institutions and the tourism enabling environment; (2) Developing Tourism Sites and Destinations; (3) Enterprise Support Program; and (4) Project management, Monitoring & Evaluation.

The project is expected to:

- Increase the number and expenditure of tourists on tourism activities;
- Increase investments and jobs in the tourism market in Ghana; and
- Create a more inclusive sector (geographically and by supporting linkages throughout its value-chain).

The activities in Component 2 will involve provision of infrastructural services (civil works support ranging from rehabilitation of potential tourist and existing sites). Matching grants to small and medium enterprises will also be provided under Component 3 to support SME growth in the tourism sector. The potential sites to be selected under this assignment will benefit from the project.

Overview of the Major Environmental and Social Risks and Stakes

The potential environmental and social risks and impacts associated with the specific project component activities are listed below. Potential sites have been identified but not confirmed. When confirmed the necessary due diligence will be done.

Sub-project activities and potential environmental and social impact issues/ concerns

Sub- Project activities/interventions	Potential Impact Issues/ concerns	
	Environmental	Social
1. Rehabilitation and refurbishment of old heritage buildings	<u>Water resources and pollution</u> ✓ Stirring up of pollutants and their transport downstream ✓ Alterations in local natural water cycles/ hydrology	<u>Land and compensation issues</u> ✓ Clear understanding of land use and occupancy ✓ Conflicts in land claims ✓ Land acquisition and compensation issues
2. Construction and upgrading of private and public buildings (hotels)	✓ Disposal of dredged material ✓ Disposal of treated wastewater <u>Vegetation losses, soil disturbance and Erosion</u>	✓ Discrimination, lack of grievance mechanisms for land owners and users ✓ Temporary and permanent properties affected by project ✓ Political influences
3. Construction and Upgrading of access roads	✓ Site clearing ✓ Increased soil erosion due to disturbances	<u>Maintaining Livelihoods</u> ✓ Community management of tourist sites (both formal and informal) ✓ Petty traders and various shops and other economic activities operating haphazardly at tourist sites ✓ Squatters/ beggars creating nuisances at tourist sites including harassment of tourists
4. De- silting of waterways and widening of river channels etc	<u>Air quality</u> ✓ Site clearing and excavation works ✓ Transport of construction materials and waste	✓ Demand for alternative locations for traders to do their business ✓ Adequate, documented and transparent compensation for affected persons in order to vacate unauthorised sections of tourist sites
5. Construction of water associated infrastructure such as jetties, bridges etc	✓ Cutting of roads ✓ Exhaust emissions for equipment including heavy duty trucks	
6. Relocation of settlements	<u>Vibration and Noise</u> ✓ Site clearing and excavation works ✓ Concrete works	
7. Solid waste management	✓ Cutting of roads ✓ Disturbance to fauna in protected areas	
8. Provision of sanitation facilities (public toilets, urinals etc)	<u>Visual intrusion</u> ✓ Construction sites ✓ Aesthetical compatibility of tourist facility with local environment <u>Generation and disposal of solid waste</u> ✓ Construction works ✓ Dredged materials	<u>Security and Safety</u> ✓ Safety and security of tourists and general public ✓ Invasion of privacy of host communities and their households ✓ Safety and security of workers including park rangers ✓ Unavailability and poor use of personal protective equipment

Sub- Project activities/interventions	Potential Impact Issues/ concerns	
	Environmental	Social
	<ul style="list-style-type: none"> ✓ Poor sanitary conditions at tourist sites ✓ Improper disposal of wastes generated by tourists <p><u>Public health and safety, and traffic issues</u></p> <ul style="list-style-type: none"> ✓ Construction works ✓ Petty thievery/ pickpocketing at tourist sites ✓ Poor traffic management at tourist sites ✓ Exposure of host communities to foreign diseases/ infections and vice versa 	<p>and limited/ no enforcement process</p> <p><u>Occupational health and Safety</u></p> <ul style="list-style-type: none"> ✓ Lack of awareness creation programs on health and safety ✓ Unavailability and poor use of personal protective equipment and limited/ no enforcement process <p><u>Cultural Heritage</u></p> <ul style="list-style-type: none"> ✓ Access to local shrines ✓ Preservation of local cultural identity and heritage ✓ Compensation issues ✓ Community pride and support ✓ Community relinquishing/ sharing heritage for greater good <p><u>Resource Access and Possible Restriction</u></p> <ul style="list-style-type: none"> ✓ Rights to question and have individual considerations addressed ✓ Possible alternative options ✓ Established grievance redress options

INSTITUTIONAL FRAMEWORK, LAWS AND REGULATIONS/PROCEDURES

National Tourism Policy, (2006) are put in place to ensure that tourism is developed and operated in a sustainable manner. They provide the means to direct, manage, and regulate the sector and to guide the activities of stakeholders in the country. Other policies of relevance to the project include the Ghana Tourism Act, 2011 (Act 817); National Environment Policy (2013); National Environmental Sanitation Policy; National Water Policy (2012); National Museum degree 1969; Forest and Wildlife Policy and National Land Policy, (1999). These legal instruments outline compliance requirements that have to be observed during the various stages of implementation of the tourism project. The ESMF sets out the principles, rules, guidelines, and procedures to assess the environmental and social risks and impacts and propose preventive and mitigation measures to enhance the sustainability of the project.

In line with the World Bank's commitment to sustainable development, five Safeguards policies have been triggered to support the project development objectives. The policies include the Environmental Assessment (OP/BP 4.01), Natural Habitats (OP/BP 4.04), Physical Cultural Resources (OP/BP 4.11), Forests (OP/BP 4.36), and the Involuntary Resettlement (OP/BP 4.12).

GENERIC RISKS AND IMPACTS OF EACH TYPE OF SUBPROJECT

The activities in Component 2 will involve provision of infrastructural services (civil works support ranging from rehabilitation of yet-to-be identified existing sites, to new and yet to be identified sites).

The potential project infrastructure to be provided may involve the following activities:

- Rehabilitation and refurbishment of old heritage buildings
- Construction and upgrading of private and public buildings
- Construction and Upgrading of access roads
- De- silting of waterways and widening of river channels etc
- Construction of water associated infrastructure such as bridges, jetties
- Relocation of settlements
- Solid waste management
- Provision of public sanitation facilities (toilets, urinals etc)

FRAMEWORK ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (FRAMEWORK ESMP)

Environmental and social mitigation measures

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
Water Resources and pollution	<p><u>Construction stage</u></p> <ul style="list-style-type: none"> ✓ Works not to be executed under aggressive weather conditions such as rains or stormy conditions. ✓ No solid waste, fuels, or oils to be discharged into any section of a waterway. ✓ Construction to be done in sections to minimize impacts and exposure of soil. ✓ Excavated materials and silt, which cannot be used will be disposed of at appropriate sites as per the Waste Management Plan prepared by contractor and approved by the Assembly. ✓ Temporary sediment barriers to be installed on slopes to prevent silt from entering water courses. ✓ Maintenance, fuelling and cleaning of vehicles and equipment to take place at off-site workshop with adequate leakage prevention measures <p><u>Operational stage</u></p> <ul style="list-style-type: none"> ✓ Adequate sanitary facilities to be provided at tourist sites to avoid discharge of waste into water bodies ✓ Host communities to be provided with sufficient toilet facilities and sensitized to use these to discourage open defecation
Air quality	<p><u>Construction stage</u></p> <ul style="list-style-type: none"> ✓ Soil/sand 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. ✓ Construction and civil works to be phased out or controlled to reduce emissions from equipment and machinery in use. <p><u>Operational stage</u></p> <ul style="list-style-type: none"> ✓ Adequate road signs to be planted on dust roads to limit vehicular speeds ✓ Properly designed and constructed speed ramps on access roads
Vibration and Noise	<p><u>Construction phase</u></p> <ul style="list-style-type: none"> ✓ Excavation and construction activities to be carried out during daylight hours. ✓ Concrete mixer and other construction machines and equipment to be located away from sensitive environmental receptors. ✓ Construction equipment and machinery to be regularly maintained and serviced to reduce noise generation when in use.

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
	<ul style="list-style-type: none"> ✓ Engines of vehicles, equipment and machinery to be turned off when not in use. ✓ Earthworks and other construction 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 ✓ Work will not be carried out during sensitive times/ periods of day/ year to avoid disturbance to fauna <p><u>Operational phase</u></p> <ul style="list-style-type: none"> ✓ Visible signs to be provided at suitable locations to warn tourists of excessive noise which may disturb fauna or other activities
Visual intrusion	<ul style="list-style-type: none"> ✓ Public to be well informed of upcoming project using appropriate signages and display boards prior to contractor accessing sites; ✓ Construction activities to be done in sections to reduce impacts of change and visual intrusions to the general public. ✓ The construction sites to be hoarded off from public view. ✓ Good housekeeping measures, such as regular cleaning, to be maintained at the construction site. ✓ Ensure an acceptable post-construction site as per provisions in the contract. ✓ Tourist facilities will be properly designed and constructed to blend with the natural environment
Land acquisition and compensation issues	<ul style="list-style-type: none"> ✓ Consult affected property owners/users/ communities and seek their consent early in the project development process ✓ Allow affected persons to salvage their properties (including crops) before mobilizing to site to start work ✓ Ensure fair and adequate compensation is paid to all affected persons prior to commencement of construction activities as per the provisions of the RPF ✓ Obtain the required developmental permits from the respective Assemblies before start of work
Generation and disposal of solid wastes	<p>Apply the principles of Reduce, Recycle, Reuse and Recover for waste management through the following actions:</p> <p><u>Construction phase</u></p> <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. ✓ Ensure judicious use of construction materials such as pipes, laterites, sand, etc. to reduce waste

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
	<ul style="list-style-type: none"> ✓ 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. ✓ Contractor to work according to a prepared and agreed Solid Waste Management Plan. <p><u>Operational phase</u></p> <ul style="list-style-type: none"> ✓ Waste collection bins to be sited at vantage points to serve the general public ✓ Warning signs to be posted at suitable locations against littering with possible sanctions ✓ Proper arrangement with waste collection companies through the Assembly to regularly collect and dispose of solid waste
Maintaining Livelihoods	<ul style="list-style-type: none"> ✓ Ensure appropriate compensations are paid to PAPs as defined in the RPF; ✓ Employment and other opportunities to be given to local communities as much as possible. ✓ GTA to organize training programs for community management teams at tourist sites to encourage professionalism ✓ GTA to actively solicit private sector investment in the identified project areas and at suitable areas encourage partnership with host communities ✓ Activities of beggars and idlers at tourist sites not to be entertained. Site managers to discuss possible alternative livelihood options and other arrangements with local communities
Public Health and Safety, and Security	<p><u>Construction phase</u></p> <ul style="list-style-type: none"> ✓ Works on exposed trenches and earth materials will, as much as possible, be completed before new earth dug and trenches are created. ✓ Work areas to be hoarded off adequately to avoid inquisitive trespassers especially children ✓ Warning signs to be posted around work areas to discourage trespassers ✓ Contractors to maintain adequate security at construction sites to avoid pilfering or vandalising of property ✓ Visibility to be ensured in the night time by providing adequate lighting <p><u>Operational phase</u></p> <ul style="list-style-type: none"> ✓ Encourage community leadership to form watch committees to improve security ✓ Work with police force to provide police posts at all major tourist sites ✓ First aid facilities to be available at all sites with suitable arrangements with local health facilities to deal with emergencies
Traffic management	<ul style="list-style-type: none"> ✓ Contractors to provide traffic management plans to be approved by relevant authorities ✓ Adequate alternative arrangements to be made to minimize impact on motorist and pedestrians ✓ Works to be completed on time to minimize inconvenience to motorists and pedestrians <p><u>Operational stage</u></p> <ul style="list-style-type: none"> ✓ Adequate road signs to be planted on access roads to limit vehicular speeds ✓ Construct properly designed speed ramps on access roads

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
Occupational health and safety	<p><u>Construction phase</u></p> <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. <p><u>Operational phase</u></p> <ul style="list-style-type: none"> ✓ Park wardens to be provided PPEs for protection against dangerous animals ✓ Park wardens to be suitably armed for protection against poachers ✓ First aid facilities to be available at all sites with suitable arrangements with local health facilities to deal with emergencies
Cultural Heritage	<ul style="list-style-type: none"> ✓ Traditional authority responsible for sanctity of local shrines properly identified and consulted ✓ Necessary cultural rites agreed with community and performed prior to access to sites

SUBPROJECTS ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCEDURE

The Regional GTA safeguard focal person must foremost carry out the preliminary environmental and social screening of proposed projects by using the checklist suggested in **Annex 1**. 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), the Regional GTA safeguard focal person must consult the Project Coordinating Unit safeguard officer at MoTAC for confirmation. Once an agreement is reached, the Regional GTA safeguard person may proceed with the minimum regular reporting requirements which will be discussed and agreed with the PCU safeguard person.

When there are doubts concerning project risks and impacts, the Regional GTA Safeguard person should consult the regional EPA for guidance as provided by the Ghana EA procedures, and in further consultation with the PCU. However, the EPA guidelines has challenges, as following the implementation procedures are not fully qualified due to logistical issues.

The following processes are to be followed:

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 formulation using E&S checklist and then the categorization and identification of the required instrument (use the national EIA procedure)

Summary of Environmental Screening Process and Responsibilities

No	Steps/Activities	Responsible	Collaboration	Service Provider
1.	Identification and/or siting of the sub-project	SFP- GTA	<ul style="list-style-type: none"> • PCU • R-GTA • ESS/SSS-PCU • SFP-MMDAs • SFP-PS 	EPA
2.	Environmental and Social screening of proposed project intervention to assist in project formulation using E&S checklist	<ul style="list-style-type: none"> • ESS/SSS-PCU • 	<ul style="list-style-type: none"> • PCU • GTA • ESS/SSS-PCU • SFP-MMDAs • SFP-PS 	WB
3.	categorization and identification of the required instrument (use the national EIA procedure)	<ul style="list-style-type: none"> • ESS/SSS-PCU 	<ul style="list-style-type: none"> • PCU • GTA • ESS/SSS-PCU • SFP-MMDAs • SFP-PS 	EPA WB

4.	Approval of the classification and the selected instrument by the Public EA Agency	PC -PCU	<ul style="list-style-type: none"> • ESS-PCU • SSS- PCU 	<ul style="list-style-type: none"> • EPA • The World Bank
5	Preparation of the safeguard document/instrument (ESIA, Env. Audit, simple ESMP, etc.) in accordance with the national legislation/procedure (taking into account the Bank policies requirements)			
6	Preparation and approval of the ToRs	<ul style="list-style-type: none"> • ESS/SSS-PCU 	<ul style="list-style-type: none"> • Procurement specialist (PS-PCU) • SFP- GTA • SFP-MMAs • SFP-PS 	<ul style="list-style-type: none"> • The World Bank
	Preparation of the report			<ul style="list-style-type: none"> • Consultant
	Report validation and issuance of the permit (when required)		<ul style="list-style-type: none"> • PS-PCU • FS-PCU • MMDAs 	<ul style="list-style-type: none"> • EPA • The World Bank • GTA • GNFS • MMDAs • GPS
	Disclosure of the document		PC-PCU	<ul style="list-style-type: none"> • Media; • The World Bank
7.	(i) Integrating the construction phase mitigation measures and E&S clauses in the bidding document prior they're advertised; (ii) ensuring that the constructor prepares his 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 sub-project (TS-PCU)	<ul style="list-style-type: none"> • ESS/SSS-PCU 	<ul style="list-style-type: none"> • Control Firm (Supervisor) • MMDAs
8	Development of monitoring indicators	M&E-PCU	<ul style="list-style-type: none"> • ESS/SSS-PCU 	<ul style="list-style-type: none"> •
9.	Implementation of the other safeguards measures, including environmental monitoring (when	ESS/SSS-PCU	<ul style="list-style-type: none"> • TS-PCU • PS-PCU • FS-PCU • MMDAs 	<ul style="list-style-type: none"> • Consultant • National specialized laboratories • NGOs • CBOs

	relevant) and sensitization activities			
10.	Oversight of safeguards implementation (internal)	ESS/SSS-PCU	<ul style="list-style-type: none"> • M&E-PCU • PCU • GTA • ESS/SSS-PCU • SFP-MMDAs • SFP-PS 	• Control Firm (Supervisor)
	Reporting on project safeguards performance and disclosure	PC-PCU	<ul style="list-style-type: none"> • M&E-PCU • ESS-PCU • SSS-PCU 	WB
	External oversight of the project safeguards compliance/performance	EPA	<ul style="list-style-type: none"> • M&E-PCU • ESS-PCU • SSS-PCU • Supervisor 	
11.	Building stakeholders' capacity in safeguards management	ESS/SSS-PCU	• PS-PCU	<ul style="list-style-type: none"> • WB • Consultant • Other qualified public institutions
12.	Independent evaluation of the safeguards performance (Audit)	ESS/SSS-PCU	• PS-PCU	• Consultant

PUBLIC COMMUNICATION AND CONSULTATION MECHANISM/PLAN

MoTAC and EPA will make copies of the ESMF available in selected public places as required by law for information and comments. Public notice in the media will serve that purpose as well as disclosure at the World Bank website.

The notification will be done through newspaper advertisements and provide:

- Brief description of the Project;
- 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 EPA will assist to select display venues upon consultation with MoTAC/ PCU.

SPECIFIC AND TARGET CAPACITY BUILDING

The capacity of the various players, currently at both MoTAC and GTA to implement the ESMF is limited. There is the need to equip identified persons with the understanding, skills and access to information, knowledge and training to enable them to perform effectively as safeguard persons. The capacity building will include training workshops and production of guidance reports and tools. The following training programs are recommended:

Training modules and proposed participants

No	Training content	Participants
1.	<ul style="list-style-type: none"> World Bank Safeguard policies of OP 4.12 and OP 4.01; WBG EHS Guidelines Ghana EPA Environmental Assessment Regulations ESMF/ RPF 	MoTAC PCU PCU safeguard specialist, GTA head office GTA regional office staff
2.	<ul style="list-style-type: none"> Screening Checklist, ToR for MoTAC PCU safeguard person ToR for Regional GTA Safeguard focal persons Completion of EA Registration Forms 	GTA regional safeguard persons, PCU safeguard specialist
3.	<ul style="list-style-type: none"> Preparation of Terms of Reference for ESIA's and RAPs 	GTA regional safeguard persons, PIU safeguard specialist
4.	<ul style="list-style-type: none"> Environmental and Social Management Plans Grievance redress registration and resolution forms 	GTA regional safeguard persons, Contractors, Supervising engineers, Project site managers (including WD, GMMB) CSOs (eg. GHCT, GWS) MMDAs, Private Sector Community persons

The main recipients for training at the highest level will be the PCU/ MoTAC and the GTA staff. Further down the scale, the tourist site managers (from Wildlife Division, Ghana Museums and Monuments and CSOs eg. Ghana Heritage Conservation Trust) and MMDAs will also benefit from training though the content will be different. The latter will be exposed to environmental and social management plans prepared for the respective sub projects.

ESTIMATED BUDGET FOR ESMF IMPLEMENTATION

The awareness creation, capacity improvement and training workshops as well as some logistic support expenses for key stakeholders involved in the implementation of proposed interventions is estimated at **US\$690,000** over the 4- year project life.

GRIEVANCE MECHANISM

As a first option, the ESMF proposes amicable settlement/ mediation. During the stakeholder engagement process, various community leaders and traditional authority described their current processes which are firmly established and effective within the project communities. These will as much as possible be used and the project will revert to outside processes only in cases when these have failed. In compensation and resettlement related operations, it often appears that many grievances derive from misunderstandings of project policy and procedures, land/asset valuations, property demarcations and boundaries among other which can usually be solved through adequate mediation using customary rules and some mediation. The table below presents recommended

timeframes for addressing grievance or disputes related to resettlement and compensation. It is envisaged that resettlement/ compensation disputes could be resolved at the community or MMDA levels. Otherwise, as a final resort, the complainant is free to use the judiciary process.

Suggested time frame

Step	Process	Time frame
1	Receive and register grievance	within 5 Days
2	Acknowledge	within 24 hours
3	Assess grievance	Within 14 Days
4	Assign responsibility	Within 14 Days
5	Development of response	within 14 Days
6	Implementation of response if agreement is reached	within 1 Month
7	Close grievance	within 7 Days
8	Initiate grievance review process if no agreement is reached at the first instance	within 1 Month
9	Implement review recommendation and close grievance	within 2 Months
10	Grievance taken to court by complainant	-

LISTING OF SOME PERFORMANCE INDICATORS

The monitoring issues at the ESMF level include providing indication of the dissemination of both ESMF and RPF documents as well as capacity building and training activities. At the sub- project activity level, this will encompass instituting monitoring actions to, for example, confirm the number of sub-projects that have been properly screened, number of instruments (ESIA, ESMP, etc.) prepared, number of permits that have been acquired and instruments (ESMPs, ESIA, etc.) that have prepared and are being implemented.

COMPREHENSIVE INSTITUTIONAL ARRANGEMENT

The institutional arrangement will be made up of the following committees to oversee the implementation of the tourism project: 1. Steering Committee; 2. Ministry of Tourism Arts and Culture; 3. Project Coordinating Unit (PCU); and 4. Technical Committee.

The roles and responsibilities of the implementing units are spelt out in more detail in the main body.

- Project coordinator:
- Environmental safeguards specialist (ESS-PCU):
- Social safeguards specialist (SSS-PCU):
- Procurement specialist (PS-PCU):
- Technical specialist (TS – PCU):
- Financial management specialist (FS – PCU):
- Monitoring and Evaluation specialist (M&E-PCU):

Table: Role and responsibilities (focus on the PCU)

Project coordinator	Coordinate day to day project implementation; public relations and coordination with project stakeholders; supporting and guiding national and international stakeholders; administration; supervision/management; monitoring and reporting
Environmental safeguards specialist	Ensure environmental compliance in all project areas (conducting EIA – where applicable)
Social safeguards specialist	Ensure all social grievances are addressed and recorded, developing relocation assessment plan – where applicable)
Procurement specialist	Provide overall procurement guidelines and support during the bidding/selection process; responsible for reviewing and handling all procurement related issues (legal, commercial and financial)
Technical specialist	Planning, coordination and management of the project activities; technical task; administrative task
Financial management specialist	Budgeting and planning; funds management; expenditure/payment processing; accounting and records management; financial reporting; audit
Monitoring and Evaluation specialist	Developing M&E system building tools and processes

A Project Coordinating Unit (PCU) would be hosted within the Ministry of Tourism, Arts and Culture to be responsible for overall project management including safeguards and grievance redress. Since the project activities will be nationwide, the respective regional GTA offices will be involved in project execution. Other agencies to be part of the implementation will include the Ghana Museums and Monuments Board as well as the Wildlife Division of the Forestry Commission and NGOs/CSOs like the Ghana Heritage Conservation Trust (GHCT) and local communities.

Dedicated implementation teams at the regions (GTAs) will be formed to participate in project planning/ coordination and implementation. They will work closely with the PCU and report to same through their head office in Accra. The regional teams will include assigned officers for Safeguards.

Local supervisory/ monitoring teams will be formed at each project tourist site to assist with the implementation of the project and will liaise with local communities to manage any safeguards related concerns.

1 BRIEF PROJECT DESCRIPTION

1.1 Background of the Project

The success of the tourism industry has been linked to several well-meaning reasons encompassing economic, social, cultural and environmental benefits. In Ghana, tourism contribution to national GDP in 2017 is nearly 7 %, though it's initial fluctuation. As a service based industry, tourism is relatively labour intensive and offers substantial employment avenue for both skilled and unskilled labour. Infrastructure development is another vital occurrence, which is powered by tourism development. The Tourism, Art & Culture Sector Improvement Project, will specifically support reforms in the Ghana Tourism Strategy and Sector Development Implementation Roadmap, as a starting point towards the revitalization of the sector. The project will also focus on fostering intersectoral stakeholder linkages and efforts coordination as well as training to build capacities to create a skilled workforce in the hospitality, tourism and Arts sector. In addition to facilitating beach sanitation and commercialization, the project will dedicate portions of the facility towards supporting MSME's within the sector for job creation among others.

The proposed project will involve rehabilitation and refurbishment of old heritage buildings and tourism facilities, Construction and upgrading of private and public buildings, Construction and Upgrading of access roads, De-silting of waterways, Construction of water associated infrastructure such as jetties, bridges etc., Relocation of settlements, Solid waste management and Provision of sanitation facilities (public toilets, urinals etc.). The overarching project development objective is to promote the potentially transformative sectors for an accelerated and inclusive economic development agenda, thereby creating job opportunities. Ghana's tourism sector relies on and draws heavily from linkages that support the generation of income and movement of people and goods. The specific objectives of the project are: (i) to update and restructure Ghana's tourism strategy, as a starting point towards revitalization of the Ghanaian Tourism sector; (ii) to Develop and implement a roadmap for tourism enhancement; (iii) Use of ICT to regularize collection and mobilization of tourism revenues; (iv) capacity building of practitioners and citizenry in general for enhancement of tourism experience; (v) support for MSME's towards restoration of existing tourist sites and setup of new facilities; (vii) beach sanitation improvement and commercialization; and (viii) facilitation of hassle free entry to Ghana (e-visa) as well as improvement of tourism safety and security through ICT. The proposed project has four primary components: (1) Strengthening institutions and the tourism enabling environment; (2) Developing Tourism Sites and Destinations; (3) Enterprise Support Program; and (4) Project management, Monitoring & Evaluation. The activities in Component 2 will involve provision of infrastructural services (civil works support ranging from rehabilitation of potential tourist and existing sites). Matching grants to small and medium enterprises will also be provided under Component 3 to support SME growth in the tourism sector. The potential sites to be selected under this assignment will benefit from the project. The project is expected to: (1) Increase the number and expenditure of tourists on tourism activities; (2) Increase investments and jobs in the tourism market in Ghana; and (3) Create a more inclusive sector (geographically and by supporting linkages throughout its value-chain).

The proposed project is rated Category B and given the specific sites and locations of project interventions have not yet been identified, the project is required to prepare an Environmental and Social Management Framework (ESMF) which would seek to mainstream all environmental and social concerns into the preparation, design and implementation of the project. The ESMF must be prepared, approved and disclosed publicly in Ghana and at the World Bank before the Bank will appraise the project.

In line with the World Bank's commitment to sustainable development, five Safeguards policies have been triggered to support the project development objectives. The policies include the Environmental Assessment (OP/BP 4.01), Natural Habitats (OP/BP 4.04), Physical Cultural Resources (OP/BP 4.11), Forests (OP/BP 4.36), and the Involuntary Resettlement (OP/BP 4.12). The Ghana EPA environmental assessment procedures (EPA LI 1999 (1652)) have also been used to guide the preparation of this ESMF.

1.2 Purpose and Objectives of the ESMF

The objective of this assignment is to undertake a detailed Environmental and Social Management Framework (ESMF) focusing on key activities outlined under the project components. The ESMF will set out the principles, rules, guidelines, and procedures to assess the environmental and social risks and impacts and propose preventive and mitigation measures to enhance the sustainability of the project with reference to both the triggered World Bank policies and the Ghana EPA EAR (LI 1999 (1652)).

In compliance with these requirements, the Environmental and Social Management Framework (ESMF) will:

- Identify measures and plans to prevent, reduce, mitigate, and/or offset adverse risks and impacts and enhance positive impacts
- Establish provisions for estimating and budgeting the costs of such alternate measures identified above
- Provide information on agency or agencies responsible for addressing project risks and impacts, including the capacity to manage environmental and social risks and impacts
- Provide adequate information on the areas in which project activities are expected to be sited, including any potential environmental and social vulnerabilities of the area and on the potential impacts that may occur and mitigation measures that might be expected to be used.

1.3 Approach to the ESMF study

Due to time constraints, it was not possible to visit all the potential sites to confirm the redevelopment opportunities that exist and the associated potential environmental and social concerns. However, in consultation with the key project persons at the Ministry and some representatives at some of the

project sites, it was possible to anticipate project activities as well as identify possible environmental and social consequences.

Collection of baseline information

Baseline information was collected and analyzed regarding:

- Key components of the Project
- Relevant existing environmental and social policies, laws and regulations related to the environmental sanitation and flooding issues in the project basin;
- Existing conditions of the main environmental and social components,
- Key environmental and social issues associated with the proposal,
- Key stakeholders in relation to the identified issues,
- Requirements for the detailed analysis of potential effects:
 - Technical studies required,
 - Public participation and stakeholder involvement,
 - Available information resources, including other ESA studies available as reference.

Stakeholder Consultation

Key stakeholders were defined as those to be directly affected by the proposed interventions, i.e. those that may be expected to either benefit or lose from the proposed alternative/project, particularly among the poor and the marginalized. Those directly involved included persons and institutions with technical expertise and public interest in the Bank-supported programs as well as with linkages to the poor and marginalized.

The ultimate beneficiaries of this project include the communities who reside and/ or sometimes earn their living and must be protected from harm or undue consequences of the project. Some community leaders were therefore targeted for consultation. The Regional Tourism managers, Park managers and others responsible for the management of the various tourist sites will also benefit from improved policies, capacity development programmes and outreach and communication programmes and it was important to solicit their views. Other stakeholders including the private sector and civil society, will also benefit through the improved resource management practices. The key stakeholders interacted with included:

- Public officials with influence on the project (MoTAC, Tourist Development Authority, Museums and Monuments, Wildlife Division of the Forestry Commission, EPA etc)
- Local administrative assemblies (Nzema East Municipal Assembly and Twifo Heman District Assembly)
- Communities hosting fringing tourist sites and their leadership (Traditional authorities, Assemblypersons, Community Chairpersons etc)

Analysis of data and Content of report

The data gathered was analyzed to produce the ESMF document which comprise the following content:

- Introduction
- Description of the Project and Related Activities

- Policy, Regulatory and Institutional Framework
- Ghana Baseline Description
- Project Activities, Potential Impacts and Issues, and Screening Provisions
- Guidelines for Mitigation and Enhancement Measures
- Environmental and Social Management Plan
- Institutional Capacity for ESMF Implementation
- Monitoring and Evaluation
- Consultations, ESMF Disclosure and Grievance Mechanism
- Conclusion
- References/ Bibliography

1.4 Project Components

The proposed project has four primary components:

(1) Strengthening institutions and the tourism enabling environment; (2) Developing Tourism Sites and Destinations; (3) Enterprise Support Program; and (4) Project management, Monitoring & Evaluation.

The GoG's stated over-arching goal for tourism is (i) to increase domestic tourism to spread income and improve cohesion, enhance cultural attractions, and build linkages with the cultural industrial sector and (ii) to ensure tourism develops in a responsible manner and that it contributes to the country's GDP, reduces poverty, ensures that its operation is not detrimental to the environment and the culture and traditions of the Ghanaian, and attracts a wide range of markets.

The Government has also set priorities for the sector to move beyond 'potential' to tourism being an actual GDP contributor. Areas to be urgently addressed include: Sanitation: clean beaches- ending open defecation and creating better waste management systems; Education: top tourism and hotel school and Investment: direct support to investors to build hotels.

1.5 Major Sub-Project Activities

The potential subprojects to be identified with the Ghana tourism products include the following regions:

The Western Region

The Western Region of Ghana is an integrated complex of beautiful safe beaches and African touch beach resorts. It has the largest collection of European trading forts (later used in the slave trade); the highest tropical forests; numerous mines, picturesque villages and friendly people; and old architectural styles and vivacious festivals. The Western Region has a rich heritage demonstrated by the number of castles still open to visitors:

- Fort St Appolonia at Beyin
- Fort cross at Dixcove (1693)

- Fort Batensteyn (1656) at Butri
- Fort Groot Fredericksburg at Princess Town
- Fort S. Antonio at Axim (1515)
- Fort Dorothea (ruins) at Akwida
- Fort Sebastian at Shama

The Village on Stilt of Nzulezu

An amazing village where life goes on in the centre of lake Tadane, just 90km west of Takoradi. The houses are built on stilts, and traditional village life adapts to the watery conditions. The excursion from Beyin involves a walk through the reeds at the lake's edge, and a trip in a dugout canoe to the village. The village welcomes visitors every day except Thursday, which is a sacred day.

Akatekyi Crocodile Pond

30km west of Takoradi, the local fetish priest entices the crocodiles from the water with a live chicken. Visitors are welcome every day except Wednesday, a sacred day.

The Beaches of the Western Region

Western region is famous for some of the best beaches in Ghana. Some of the most popular beaches are:

- 1 Busua Pleasure Beach – only 5km from fort metal cross
- 2 Sports Club Beach – behind the Atlantic hotel in Takoradi
- 3 Ajua Beach – just 200metres from Dadowa lagoon
- 4 Princess Town Beach – off the Takoradi/Elubo highway
- 5 Mimia Beach – a secluded beach with rocky cave perfect for picnics.

Dr. Nkrumah's Grave

The original grave of Dr. Nkrumah, first President of Ghana and now buried in the mausoleum in Accra, can be found at Nkroful, 83km west of Takoradi.

The Mines of Ghana

The western region has several mines that may be visited, by prior arrangement. The main sites are:

- Nsuta Manganese Mine – 20km southeast of Tarkwa
- Prestea Goldmine – 40km north of Tarkwa
- Tarkwa Goldmines – founded in the 1800s just 92km northwest of Takoradi

Cultural Festivals & Events

Sekondi Kundum: Oral tradition states that a hunter from Aboade saw dwarfs dancing to the rhythm of strange music while on a hunting expedition. The hunter watched these strange creatures perform their strange dance for one month and later brought the dance home. Another legend also says that there existed in the village of Aboade a palm tree, which is associated with the origin of the Kundum Festival. The fruits of this tree used to ripen once in a year, and with time, this period became a symbolic calendar in the lives of the people. The ripening of the palm fruit became the signal for the festival to begin.

The Nzemas later adopted Kundum. It is therefore not only the Achantas who celebrate Kundum, but also the Nzemas. The Sekondi people also adopted Kundum when they settled at Sekondi. Although there are similarities in the way Kundum is celebrated among these people, there are some unique features in the way it is celebrated in every district. Through these festivals, the people remember their ancestors and ask for their help and protection. The festivals are also used to purify the whole state.

The Sekondi Kundum Festival may be regarded as a harvest festival, as well as a period for remembering the dead, cleansing the community and setting new goals for the coming year. When the paramount chief sits in state to receive homage from his subjects, development projects are planned and means for raising funds are considered.

Akatekyi crocodile pond

About 30km west of Takoradi, at the Akatekyi Lagoon, this is a pond where crocodiles are enticed from the water by the incantations of a fetish priest and the protests of a live fowl.

Ankasa Conservation Area

Ankasa Conservation Area is twin Wildlife Protected Area comprising Nini-Suhien National Park and the Ankasa Resource Reserve. It is about 500km² situated in the Western Region of Ghana. Ankasa is the only area in the Wet Evergreen Forest Zoo. The Southwestern corner of the reserve is about 5 kilometres from the border town of Elubo. Takoradi is about 120 kilometres east.

Being the area with the highest rainfall in Ghana, Ankasa is the richest forest in terms of botanical diversity in the Country. Its natural resources are enough to announce its presence on the world tourism map as haven and Ghana's tourism address therefore, there is no wonder that Ankasa remains as one of the natural treasures of the nation.

Its attractions include:

Flora: Being the area with the highest in Ghana, Ankasa is the richest forest in terms of botanical diversity in the Country. About three hundred (300) plant species have been recorded in a single hectare. Notable among the plant is: Makore, Dahoma and Khaya. Ankasa is home to many well know plants including: Marantas, Glory bower, Bloody Lilly. There are also spectacular ferns and orchards.

Fauna: Charismatic and tourist-pulling animals such as the bongo and forest elephant as well as ten (10) primate species including the endangered Diana monkey and west African Chimpanzee abound in Ankasa. Bird fauna is also rich – at least 263 bird species have been recorded so far.

The Water Fall: The Ankasa rainforest serves as shed for many streams and rivers. Three of them from which the forest derives its name are the Ankasa, Nini and Suhien. The fascinating characteristics of these rivers are the rapids found on them. The breezes along the rivers and rattling noise of the rapids are a delight to tourists. The potential canoeing is been explored.

The Bamboo Cathedral: The spectacular Bamboo Cathedral is located at Nkwanta about 8km from the

Ankasa gate of the Park. Though not a church building and has no human Bishop, a priest nor a creed, the site showcases nature's perfect architectural design. The giant and suppliant bamboos bow and criss-cross at their apex as if in a handshake to form a dome. The bamboos plants forming a canopy give the semblance of a cathedral over which the breeze presides a perfect habitation for relaxation.

Camping facilities: There are tourist camps for those wishing to stay for a few nights in the park. The camping facilities are made mainly with local building materials are located at the Ankasa Gate, Elubo Gate and Nkwanta.

The Amansuri Conservation Area

The Conservation is a project been undertaken by the Amansuri Conservation & Integrated Development Project with the aim of managing the pristine Amansuri wetland and its fresh water lagoon. The wetland has the stand of intact swamp forest in Ghana and home to varieties of animals like monkeys, crocodiles, marine turtles and birds. It has been selected as one of the Important Bird Areas in Ghana based on Birdlife International criteria.

The project is located within the Western Nzema Traditional Area in the Jomoro District, one of the 11 districts in the Western Region. The area is about 360km west of Accra.

Bia National Park

Bia National Park is bordered to the south with a 563 square kilometer Resource Reserve and is an International Biosphere Reserve Park. The reserves are situated in the transition between the moist evergreen and semi-deciduous tropical forest and cover much of the drainage for the Bia River. Bia became a protected area in 1935 and an official national park in 1974. Some of the tallest trees left in West Africa are found in this park. There are 62 species of mammals known to exist in the park including 10 primate species (three species of colobus, the Diana monkey and the chimpanzee, Pan troglodytes, among others), leopard, buffalo, the forest elephant, Loxodonta cyclotis, and the bongo, Tragelaphus euryceros. Over 160 species of birds including hawks, eagles, bulbuls, flycatchers, the black-collared lovebird and the threatened white-breasted guinea fowl live in this habitat. The park is the only known home of Agama sylvanus, a newly discovered species of lizard

Tourist attractions in the Central Region

The Region is famous for its ancient forts and castles and beautiful coconut palm shaded beaches. Apart from Cape Coast, Elmina is the next well-known destination for tourists. However, the Region is rich in other fascinating historic places such as Anomabu, Abandze, Komenda and Moree.

Castles and Forts

Three of the castles have been designated World Heritage Monuments by the World Heritage Foundation under UNESCO. They are Cape Coast Castle, Elmina Castle and Fort St. Jago.

West African Historical Museum

The West African Historical Museum is located inside Cape Coast Castle and contains a growing collection of art and cultural objects from various parts of West Africa, for example ceremonial drums,

old muskets, shackles from the slave trade and ancient pottery.

Beaches

Some of the best beaches in the Central Region are listed as Brenu Beach, Winneba Beach, Gomoa Fetteh Beach with peaceful lagoons as winter home for migratory birds.

Kakum and Assin Atandanso Nature Reserve

This reserve was formed to protect one of the last vestiges of Ghana's rapidly-vanishing tropical rain forest and the rare wildlife it contains.

The habitats of some of the world's rare and most endangered wildlife species, for example; the nearly extinct Mona Monkey, Bongos, Royals Antelopes, Duikers, Forest Elephants, Giant Forest Hogs, Honey Badgers, African Civet Cats and Forest Buffalos.

Festivals and cultural events

The Central Region's culture is depicted through many interesting and colourful festivals throughout the year. These annual festivals serve a variety of purposes, such as purification of the "stools", cleansing communities of evils, ancestral veneration and supplications to the deities for prosperity and unity.

The festivals' major highlights include drumming, dancing and firing of musketry. Chiefs, adorned in rich Kente cloth and bedecked in gold, are paraded through the town in palanquins, shaded by huge and colourful parasols and include Bakatue, Edina Buronya, and Aboakyir (Deer Hunt) Festival, Fetu Afahye etc.

2 BASELINE CONDITIONS OF PROJECT AREA

2.1 Geography, topography and Climate of Ghana

Located on the Gulf of Guinea in West Africa, Ghana is a tropical country just North of the equator with a population of 22.8 million people growing at an annual rate of 2.4 per cent. With an area of 238,540 square km, Ghana is a medium-sized country compared to its West African neighbours. It lies on the Atlantic and has a 540km coastline. The Volta Lake in the East of the country is one of the world's largest artificial body of water and occupies approximately five per cent of the country. Ghana's central location in West Africa is advantageous as a trade hub and gateway for other West African countries and accessible to international and regional tourists (see Figure 1, the map of Ghana).

Ghana is predominantly flat and low lying with most of the country at an altitude of less than 150 metres. The highest peak is Mount Afadjato (885m), located East of the Volta Basin. The coastal plains extend through the Southern, Central and Eastern parts of the coastal area and include Accra and several of the country's major towns such as Takoradi and Sekondi in Western Region and Cape Coast in Central Region. The forest-dissected plateau occupies the South Western part of the country. The savannah high plains in the Northwest gently roll at an average height of between 180 and 300 metres.

The large Volta River Basin, comprising mostly sandstone, occupies the East Central part of the country. All the major rivers flow into the ocean and the only area of internal drainage is that of Lake Bosumtwi in South Central Ghana, into which streams flow from the surrounding highlands. The Volta River system, by far the longest and largest river in the country, drains nearly three-quarters of the country's land area. It offers potential for lake and river related tourism.

Ghana is blessed with kilometres of pristine beaches. The coasts of the Central and Western Region in particular are popular with many resorts. There are strong currents and undertow in certain area, which make its dangerous for water sports while other locations are safe for swimming.

Ghana's climate is influenced by two air masses - the continental air mass (known as the Northeast trade winds or the harmattan wind) and the tropical maritime air mass (Southwest monsoons). The continental air mass originates in the heart of the Sahara Desert and is always dry. There are two wet seasons each year In the South, from April to July and from September to November. The North experiences one rainy season from May to September followed by a long dry season. As Ghana is close to the equator, the average monthly temperature rarely falls below 25 degrees.

2.2 Vegetation and wildlife

Rain forests and moist deciduous forests are mostly found in the Southwest of the country. Much of Central and Northern Ghana is covered by wooded savannah, which is green during the rainy season

but becomes parched and brown after the rains. Scrubland and grassland are mostly found in the drier coastal areas where human activity is less intense. Mangrove forests grow around coastal lagoons although these are being depleted by cutting and harvesting for commercial uses and by local communities who use the wood for firewood and to smoke fish.

The NGO Conservation International reports that there are 222 species of mammals, 128 species of reptiles and 38 species of amphibians in Ghana. National parks and reserves are habitats for mammals, both large and small, including elephants, lions, leopards, hippopotamus, spotted hyenas, civet cats, bongos, buffalos, warthogs, river hogs, waterbucks, bushbucks, kob, duikers, oribis, aardvarks, genets, hartebeests, roan antelopes, pangolin, porcupine, chimpanzees, baboons, black and white colobus, mona, the rare Diana monkey and other species of primates. Ghana is home to both forest and savannah elephants, several species of inland and coastal crocodiles and various types of snakes including pythons.

2.3 Overview of the Tourism Sector

The World Bank issued the 'Ghana Tourism Scoping Diagnostic Report' in 2017. The report indicates that current economic value of tourism is unclear due to poor collection of arrival statistics and lack of recent expenditure and domestic tourism surveys. Business and corporate tourism which dominates Ghana's travel and tourism sector has performed poorly recently because the expected robust growth and development of the oil and gas sector did not materialize. The high dependence on this market, along with the lack of mainstream diversification into tourism products, has led to nationwide slump in the sector.

The World Travel and Tourism Council (WTTC) estimates that tourism's direct contribution to GDP is however expected to increase by 5% annually between 2016 and 2026. The WTTC tourism employment data for 2015 lists 292,000 direct and 716,500 total jobs which correspond to a 2.6% and a 6.5% of the total national employment respectively. The UNWTO international tourist expenditure data suggest tourists spend about US\$2,000 per trip. Also, 70% of total tourist expenditure is thought to come from business tourists and just 30% from leisure visitors.

Domestic tourism is growing but at the present time involves travel for funerals and business rather than leisure. The domestic tourism market is predominantly contributed by the expatriate community and a few wealthy Ghanaians. There are also regular school trips around the country as well as social groups (church groups, extended family, interest based groups) including organized tours by radio stations and other media groups.

Major Constraints

Three sector-wide constraints have been identified as critical: i) lack of government prioritization of tourism ii) Multiplicity of government regulation, and iii) high cost of doing business. In addition, two constraints that are specific to the tourism market were identified: i) barriers to access, and ii) deterioration of the product and services.

Lack of Government prioritization of tourism: The most commonly stated private sector concern was long period of low prioritization of tourism from the government. The current Minister of Tourism seems determined to change this through the development of a new action strategy. It is critical to the development of the tourism market that the new strategy focuses on diversification of the sector. This will pave the way for the expansion of investment and job generation opportunities outside the capital.

Multiplicity of government regulations: The second most frequently mentioned constraint to private sector growth is the multiplicity of government regulation in tourism. More than 15 different taxes, permits, and levies have to be paid to the various government agencies every year, such as to fire services, the health department, environment, GTA, the food and hygiene department, etc. Some operators noted they were inspected two or three times a month and each time, more payments were requested by the inspections, as well as a rent-capture mentality that seemed to be counter to the role of government to support business growth. In order to kick-start the hospitality industry, it important that there is an easing of regulation and that the provision of permits and licenses is streamlined and made more transparent.

High cost of doing business: Linked to the high number of regulations is the generally high cost of doing business, a main contributor to high room rates, which has resulted in an uncompetitive tourism industry. Number one of the costs constraining growth is energy; it represents often as much as 40% of operational cost according to the Ghana Hotel Association. Energy costs in Ghana are four times the regional average due to poor transition, huge debt, multiple illegal connections, and a failure of government to pay energy bills.

Some specific constraints

A number of the constraints facing tourism in Ghana have particular implications for the tourism market. These include cumbersome visa procedures, poor marketing, and deterioration of the product and service. Together with the sector-wide constraints, these have effectively led to the stagnation of international, inter-regional, and domestic demand.

Barriers to Access: For international visitors, the burdensome visa requirements are a significant hurdle (see box below). Whereas for business travelers, companies will take care of the process limiting any inconveniences to the traveler, for tourists the inconvenience of the visa process (getting photos, letters of support) and the risk of mailing a passport is a significant deterrent.

Poor and ineffective marketing has further exacerbated the atrophy of the non-business related international visitor market. Though the Ghana Tourism Authority has an attractive and relatively new site, there is little interaction with the customers. Individual businesses are poorly marketed and not well profiled on Trip Advisor or other social media sites.

Deterioration of tourism Product: Ghana possesses many tourism assets (natural and heritage based) but these are poorly integrated into the tourism offering, are largely underfunded, and lack visitor

management plans and trained staff. There is no tourist signage in the country, no indication of UNESCO World Heritage status, very little renovation or interpretation of forts and castles or parks. Road congestion in and out of Accra due to poor urban planning and limited toll booths, further reduce the appeal of a trip out of the capital. Once at a site, there are no parking areas, limited food, or low-quality souvenir shops, and generally a lack of rent-capture due to low numbers and poor training. Restaurant and food service is notoriously slow. There is often over an hour wait for simple meal. Businesses complain of difficulty in finding trained staff, particularly those who have had practical and to just academic training provided by the universities and private colleges.



Figure 1: Key tourist sites in Ghana

3 OVERVIEW OF THE MAJOR ENVIRONMENTAL AND SOCIAL RISKS AND STAKES

The nature and scope of planned works under the project present significant social and environmental risks. In particular, the process of implementing physical works and the (in) actions of contractors are expected to extend both positive and negative environmental and social impacts through interactions with the human and natural environment of the project.

Based on experiences with similar projects, the project implementation may result in generation of noise, dust, and waste from construction activities, occupational health and safety concerns, intrusion on physical cultural relics and natural protected environments through construction activities, pollution and alteration of natural streams and river courses, destruction of natural habitats within river basins, and therefore the need for mitigation measures. The environmental regulations of Ghana and the World Bank’s operational policies on environmental and social safeguards require that projects that present significant risks to communities and the environment must assess, plan, avoid, minimize and as a last resort, mitigate negative effects, while extending the development benefits that are presented by the project. The key sub projects will require the design and implementation of mitigation actions as per this ESMF.

3.1 Description of some risks and potential impact issues

The potential environmental and social risks and impacts associated with the specific project component activities are listed below. Potential sites have been identified but not confirmed. When confirmed the necessary due diligence will be done.

Table 1: Sub-project activities and potential environmental and social impact issues/ concerns

Sub- Project activities/interventions	Potential Impact Issues/ concerns	
	Environmental	Social
. Rehabilitation and refurbishment of old heritage buildings 0. Construction and upgrading of private and public buildings (hotels, guest houses, stalls, health posts etc)	<u>Water resources and pollution</u> ✓ Stirring up of pollutants and their transport downstream ✓ Alterations in local natural water cycles/ hydrology ✓ Disposal of dredged material ✓ Disposal of treated wastewater <u>Vegetation losses, soil disturbance and Erosion</u> ✓ Site clearing ✓ Increased soil erosion due to disturbances	<u>Land and compensation issues</u> ✓ Clear understanding of land use and occupancy ✓ Conflicts in land claims ✓ Land acquisition and compensation issues ✓ Discrimination, lack of grievance mechanisms for land owners and users ✓ Temporary and permanent properties affected by project ✓ Political influences <u>Maintaining Livelihoods</u>

Sub- Project activities/interventions	Potential Impact Issues/ concerns	
	Environmental	Social
1. Construction and Upgrading of access roads	<u>Air quality</u> ✓ Site clearing and excavation works ✓ Transport of construction materials and waste	✓ Community management of tourist sites (both formal and informal) ✓ Petty traders and various shops and other economic activities operating haphazardly at tourist sites
2. De- silting of waterways and widening of river channels etc	✓ Cutting of roads ✓ Exhaust emissions for equipment including heavy duty trucks	✓ Squatters/ beggars creating nuisances at tourist sites including harassment of tourists ✓ Demand for alternative locations for traders to do their business
3. Construction of water associated infrastructure such as jetties, bridges etc	<u>Vibration and Noise</u> ✓ Site clearing and excavation works ✓ Concrete works	✓ Adequate, documented and transparent compensation for affected persons in order to vacate unauthorised sections of tourist sites
4. Relocation of settlements	✓ Cutting of roads ✓ Disturbance to fauna in protected areas	<u>Security and Safety</u> ✓ Safety and security of tourists and general public
5. Solid waste management	<u>Visual intrusion</u> ✓ Construction sites ✓ Aesthetical compatibility of tourist facility with local environment	✓ Invasion of privacy of host communities and their households ✓ Safety and security of workers including park rangers
6. Provision of sanitation facilities (public toilets, urinals etc)	<u>Generation and disposal of solid waste</u> ✓ Construction works ✓ Dredged materials ✓ Poor sanitary conditions at tourist sites ✓ Improper disposal of wastes generated by tourists	✓ Unavailability and poor use of personal protective equipment and limited/ no enforcement process <u>Occupational health and Safety</u> ✓ Lack of awareness creation programs on health and safety ✓ Unavailability and poor use of personal protective equipment and limited/ no enforcement process
	<u>Public health and safety, and traffic issues</u> ✓ Construction works ✓ Petty thievery/ pickpocketing at tourist sites ✓ Poor traffic management at tourist sites ✓ Exposure of host communities to foreign diseases/ infections and vice versa	<u>Cultural Heritage</u> ✓ Access to local shrines ✓ Preservation of local cultural identity and heritage ✓ Compensation issues ✓ Community pride and support ✓ Community relinquishing/ sharing heritage for greater good
		<u>Resource Access and Possible Restriction</u>

Sub- Project activities/interventions	Potential Impact Issues/ concerns	
	Environmental	Social
		<ul style="list-style-type: none"> ✓ Rights to question and have individual considerations addressed ✓ Possible alternative options ✓ Established grievance redress options

4 INSTITUTIONAL FRAMEWORK, LAWS AND REGULATIONS/PROCEDURES

The relevant national and sector policies and plans, national legal and institutional frameworks and World Bank safeguards policies to guide the proposed projects are listed here and briefly described.

A comprehensive National Tourism Policy was formulated in close consultation with stakeholders over a two-year period from 2004 to 2006. It provides a detailed background to the tourism sector in Ghana, the policy framework that existed at the time, the performance of the sector and identifies key constraints and limitations in:

- The supportive and conducive environment – constraints of a political, legal/policy framework, economic, social, and environmental nature are identified
- Quality of tourism products and services
- Tourism marketing
- Financing the industry
- Tourism management and administration

The policy is guided by the principles of Ghana’s Growth and Poverty Reduction Strategy (2006-2009), the New Partnership for Africa’s Development (NEPAD) and the Revised Treaty of the Economic Community of West African States (ECOWAS). It is formulated around eleven themes; each with a stated objective and set of strategies. The emphasis is put on private sector-led growth, high level of public-private partnership, and government providing the appropriate environment to attract investment and commitment from the private sector.

National Environment Policy (2013)

The Ghana National Environmental Policy was formulated in 1995 and revised in 2013. The ultimate aim of the National Environmental Policy of Ghana is to improve the surroundings, living conditions and the quality of life of the entire citizenry, both present and future. It seeks to promote sustainable development through ensuring a balance between economic development and natural resource conservation. The policy thus makes a high quality environment a key element supporting the country’s economic and social development.

National Environmental Sanitation Policy dated April 2010

The revised environmental sanitation policy seeks to refocus the priorities of the sector, so it is forward looking and effectively embraces the challenges of changing life-styles associated with modernization and improving wealth status. The policy lays the basis for developing a systematic

approach and framework for identifying and harnessing resources for value-for-money (economy, effectiveness and efficiency) services to all.

National Water Policy

The National Water Policy was formulated in 2007 within the context of Growth and Poverty Reduction Strategy (GPRS II), New Partnership for Africa's Development (NEPAD) and the Millennium Development Goals (MDGs). The policy objective is to "promote an efficient and effective management system and environmentally sound development of all water resources in Ghana." (Government of Ghana, 2007:12). The highlight of the document is the recognition that water resources have competitive and conflicting uses and is organized around three themes namely water resources management, urban water supply and community water and sanitation.

The water resources management theme discusses issues relating to flood abatement under focal areas 1 and 6 that cover integrated water resource management and climate change/variability respectively. In both focal areas, there is an acknowledgement that water resources are finite and vulnerable given its multiple uses. The plan recognizes the need to integrate water resources planning with land use planning activities and adopt river basins as planning units. Finally, water resources were to be protected from human activities and river basin management was to be integrated with coastal zone and wetlands management. These sections also make statements about the threat posed by extreme weather events, notably flooding.

2012 Forest and Wildlife Policy

The 1994 Forest and Wildlife Policy was revised in 2011 and subsequently approved in 2012. The policy aims at the conservation and sustainable development of forest and wildlife resources for the maintenance of environmental stability and continuous flow of optimum benefits from the socio-cultural and economic goods and services that the forest environment provides to the present and future generations, whilst fulfilling Ghana's commitments under international agreements and conventions.

The objectives of the policy are to manage and enhance the ecological integrity of Ghana's forest, savannah, wetlands and other ecosystems; to promote the rehabilitation and restoration of degraded landscapes through plantations development and community forestry; to promote the development of viable forest and wildlife based industries and livelihoods; and to promote training, research and technology development that supports sustainable forest management. This new policy seeks to address the limitations of the preceding policy of 1994 while also taking advantage of emerging global approaches such as Voluntary Partnership Agreements (VPA), Forest Certification and Reducing Emissions from Deforestation and forest Degradation (REDD), which have far reaching implications for the forest and wildlife industry as well as for local livelihoods. It is the aim of the Commission to be a corporate body of excellence in the sustainable development management and utilization of Ghana's forest and wildlife resources meeting both national and global standards for forest and wildlife resource conservation and development.

National Land Policy, 1999

The policy is conservation sensitive with potential for ecosystem maintenance, biodiversity and scenic preservation under protection and leaving management of such lands under the collaborative effort of major stakeholders including the government and the community.

(a) The use of any land in Ghana for sustainable development, the protection of water bodies and the environment and any other socioeconomic activity will be determined through national land use planning guidelines based on sustainable principles in the long term national interest.

(b) All lands declared as forest reserves, strict nature reserves, national parks, wildlife sanctuaries and similar land categories constitute Ghana's permanent forest and wildlife estates, and are "fully protected" for ecosystem maintenance, biodiversity conservation and sustainable timber production.

(c) Fully protected land areas as well as timber and wildlife protected areas may be used for the purposes of education, research, recreation and tourism, provided that such uses are compatible with the conservation of the environment.

(d) Land categories outside Ghana's permanent forest and wildlife estates are available for such uses as agriculture, timber, mining and other extractive industries, and human settlement within the context of a national land use plan.

(i) Unless approved by the appropriate public authority, no land use change of any kind will be countenanced.

(m) All land and water resources development activities must conform to the environmental laws in the country and where Environmental Impact Assessment report is required this must be provided. Environmental protection within the 'polluter pays' principle will be enforced.

The relevant national laws and legislation particularly to guide the preparation of the ESMF for the proposed project include the following:

The Ghana Tourism Act, 2011: The Act 817 establishes the Ghana Tourism Authority with the objective to promote the sustainable development of the tourism industry internationally and within the country and with the following functions:

- Implement and ensure compliance with the Regulations developed in accordance with this Act;
- Grant licenses for the tourism industry, regulate and supervise tourism enterprises;
- Regulate and monitor the activities of licensees;
- Initiate, conduct, promote and encourage studies for the growth and development of the tourism industry;
- Oversee the administration of the Tourism Development Fund and ensure that the Fund is used for the required purposes;
- Ensure collaboration with other public, private and international agencies;
- Ensure the management and development of appropriate designs for tourist sites;
- Investigate and take measures to eliminate illegal, dishonorable, unsound and improper activities in relation to any activity regulated under this Act;
- Establish standards, guidelines and codes of practice in relation to carrying on or running a tourist enterprise and attractions;

- Ensure pro-poor, sustainable and responsible tourism;
- Develop standards and guidelines for designs for use at tourist attractions and enterprises to reflect Ghanaian culture;
- Take appropriate measures for the safety and security of consumers of the tourism industry;
- Collect, compile and publish information and statistics in respect of activities regulated under this Act;
- Advise the Minister on policy issues generally on matters related to the tourism industry;
- Identify and acquire suitable land for tourism development; and
- Perform any other function incidental or conducive to the attainment of the object of the Authority.

The State Lands Act, 1962 The Act 125 vests the authority to acquire land for the public interest in the President of the Republic. It also gives responsibility for registering a claim on the affected person or group of persons, and provides details of the procedure to do this. The State Lands Act, 1962 provides some details to be taken into consideration when calculating compensation such as definitions for (1) cost of disturbance, (2) market value, (3) replacement value, etc.

Administration of Lands Act of 1962 (Act 123) gives the President power to acquire stool land that will be held in trust (in the public interest) and vests the management of all stool land revenue in the central government.

Land Title Registration Law of 1986 (PNDC) 153 provides for the registration of title to lands.

Lands Commission Act, 2008 (Act 767) The Lands Commission Act 2008 establishes the Lands Commission to integrate the operations of public service land institutions in order to secure effective and efficient land administration to provide for related matters. The objectives of the Commission include among others to:

- Promote the judicious use of land by the society and ensure that land use is in accordance with sustainable management principles and the maintenance of a sound eco-system; and
- Ensure that land development is effected in conformity with the nation's development goals.

Office of the Administrator of Stool Lands Act 1994, Act 481: The OASL Act 1994, Act 481 establishes the Office of the Administrator of Stool Lands as enshrined in Article 267 (2) of the 1992 Constitution and it is responsible for establishment of stool land account for each stool, collection of rents and the disbursement of such revenues. The Administrator is charged with the management of stool lands and in accordance with the provisions in the 1992 Constitution, 10% of the gross revenue goes to the Administrator of Stool Lands for administrative expenses whilst the remainder is disbursed as follows:

- 25% to the stool through the traditional authority for the maintenance of the stool;
- 20% to the traditional authority;
- 55% to the District Assembly, within the area of authority of which the stool lands are situated.

Ghana Museums and Monuments Board Act 387, 1969 and later strengthened by the Executive Instrument 29 (1973) established the GMMB as the legal custodian of Ghana's material cultural heritage (movable and immovable).

Forestry Commission Act of 1999 (Act 571) Forestry Commission Act, 1999 (Act, 571) – This Act repealed Act 453 and re-establish the Forestry Commission as a semi-autonomous corporate body and also brought under the Commission, the forestry sector agencies implementing the functions of protection, development, management and regulation of forest and wildlife resources. Section 2 (1) states *The Commission shall be responsible for the regulation of the utilization of forest and wildlife resources, the conservation and management of those resources and the co-ordination of policies related to them.*

Forest Protection Decree of 1974 (NRCD 243) attempts to protect the integrity of forest reserves by prohibiting virtually all activities therein if done without the written authorization of the Forestry Department. Forest Protection Decree, 1974 (NRCD 243) – This Act defined forest offences and prescribed sanctions and or penalties for such offences.

The Forest Protection (Amendment) Act 2002 (Act 624) – This Act repealed the Forest Protection (Amendment) Law, 1986 (PNDCL. 142), and amends the Forest Protection Decree 1974 (NRCD 243) to provide for higher penalties for offences. It reviewed forest offences fines upwards and introduced joint liability in the commitment and prosecution of forest offences.

Water Resources Commission (WRC Act 1996, Act 522): The Water Resources Commission Act, 1996 (Act 522) establishes and mandates the Water Resources Commission (WRC) as the sole agency responsible for the regulation and management of the utilisation of water resources and for the co-ordination of any policy in relation to them.

Section 13 prohibits the use of water (divert, dam, store, abstract or use water resources or construct or maintain any works for the use of water resources) without authority. Section 16 empowers the Commission to grant Water Rights (water use permits) to prospective users. The Act states under Section 24 that any person who pollutes or fouls a water resource beyond the level that the EPA may pre-scribe, commits an offence and is liable on conviction to a fine or a term of imprisonment or both.

The Environmental Protection Agency (EPA) Act, 1994 (Act 490): This Act establishes and mandates the EPA to seek and request information on any undertaking that in the opinion of the Agency can have adverse environmental effects and to instruct the proponent to take necessary measures to prevent the adverse impacts. The EPA Act, 1994 (Act 490) gave mandate to the Agency to ensure compliance of all investments and undertakings with laid down Environmental Assessment (EA) procedures in the planning and execution of development projects, including compliance in respect of existing ones.

Part II of the Act 490 deals with pesticides control and management and this was formally an Act on its own (Pesticides Control and Management Act of 1996, Act 528). This section of Act 490 provides the rules for registration, pesticides classification, approval, clearance, using, disposing of and non-disclosure of confidential information, the granting of license labeling and pesticides inspections.

The Environmental Assessment Regulations of 1999, LI 1652: The Environmental Assessment Regulations of 1999, LI 1652 enjoins any proponent or person to register an undertaking with the Agency and obtain an Environmental Permit prior to commencement of the project. It indicates the EIA process and provides list of environmentally sensitive areas as well as possible undertakings requiring EIA.

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

The Fees and Charges (Amendment) Instrument 2015 (L.I. 2228) provides a comprehensive rates, fees and charges collectable by Ministries, Department and Agencies (MDAs) for goods and services delivered to the public. The LI 2216 therefore repeals the Environmental Assessment Regulations (Amendment) 2002 (LI 1703) which originally stipulated the fees and charges to be paid by proponents with respect to Environmental Permits and Certificates.

Several public sector institutions represent tourism in different capacities, including:

- The Ministry of Tourism and Arts and Culture (MOTAC)
- The Ghana Tourism Authority (GTA)
- Ghana Tourism Development Corporation (GTDC)
- Hotel and Catering Tourism Training Institute (HOTCATT)
- Metropolitan, Municipal and District Assemblies (MMDA)
- Environmental Protection Agency
- Forestry Commission
- Water Resources Commission

Ministry of Tourism, Arts and Culture (MoTAC)

The Ministry of Tourism was created in 1993 and has gone through a number of transformations over the years. The vision of the Ministry is to realize the sector's full potential in contributing to economic wealth, poverty reduction, environmental conservation, national cohesion, and achieve greater GDP growth. The principle functions of the Ministry are:

- Policy formulation
- Planning and development
- Promulgation of legislation and regulations
- Encouraging investment
- Developing human resources for the sector
- Intergovernmental and industry relations
- International cooperation and relations

Ghana Tourism Authority

The Ghana Tourism Authority is the implementation and advisory arm of the Ministry. It was formed by the Tourism Act 817 in 2011 and replaces the Ghana Tourist Board. Its functions are:

- The regulation of tourism enterprises namely accommodation, catering, travel and charter

- operations through registration, inspection, licensing and classification
- The promotion and marketing of tourism, both in Ghana and outside Ghana, including the publication of tourism publicity and promotional materials, and participation in fairs and exhibitions
 - Carrying out research and studies on trends in the tourism industry both at home and abroad to aid decision and policy-making
 - Facilitating the development of tourist facilities and products.

GTA has 11 regional offices. The GTA is headed by a Chief Executive and comprise two main sections: The Technical Department and the General Services Department, each under the responsibility of a Deputy Chief Director. The Deputy Chief Executive for the Technical Department oversees four departments: Research, Statistics and Information, Quality Assurance, Marketing and Planning and Product Development and Investment, each headed by a director. These departments are made up of several sub-department focusing on specific areas such as the travel trade, accommodation, catering and entertainment, product development, investment, special events, the domestic market and the international market. There is a Human Resource Development and Training Department on the General Services side which deals with promoting high standards and capacity building of the industry but also of the administration. The General Services Department comprises the following sub-departments: Finance, Audit, and Administration/Personnel. An administrator will manage the Tourism Development Fund.

GTA has 11 Regional Offices and is required to establish District Offices and Regional Committees as mandated by the ACT 817.

Ghana Tourism Development Corporation

The Ghana Tourism Development Corporation (GTDC) is a para-statal organisation in which the GTA has a 40 per cent stake. Other shareholders are Bank of Ghana, National Investment Bank and State Insurance Corporation. It was set up in 1972 as a limited liability company to encourage tourism development in Ghana. The stated objectives of the company are to:

- Promote and mobilize resources for investment in tourist undertakings and services
- Seek equity participation in joint ventures with Ghanaians as well as foreign concerns and individuals in tourist development projects
- Carry on any other business which may render profitable to the operations of the company

GTDC does not receive any subvention from Government and must generate its own operating and investment funds. The company sees its role as a pathfinder, demonstrating how the industry can be profitable and lucrative and facilitating investors. Over the years GTDC has set up several tourism businesses and has become an equity partner in others.

Hotel and Catering Tourism Training Institute

The Hotel and Catering Tourism Training Institute (HOTCATT) was established in 1991, just before the formulation of the National Tourism Development Plan, with financial support of the United Nations Development Programme (UNDP) and the International Labour Organisation (ILO). Its objective is to develop and enhance qualified manpower in the tourism industry. At the time of the plan, the Institute

was located at interim premises. The training is to focus on hotel and catering operations of Front Office, Housekeeping, Food Production, Food and Beverage Service, and Tour Guiding.

Over the years the Institute has demonstrated a mixed performance. It has had some degree of success, training 10,228 persons across the country and setting up mobile teams to provide training in the workplace for industry. However, in 2005 a consultant was hired to evaluate the performance of HOTCATT since 1991 and concluded that it was not quite meeting expectations. This is mainly because it did not receive enough subvention from government, the training equipment was outdated, the curricula weak, the management style poor, lacked leadership and the staff modestly remunerated.

In 2009, the Ministry made the decision to hand over HOTCATT to the Ghana Institute of Management and Public Administration (GIMPA) with the mandate to provide tourism and hospitality training in the country to help improve professional standards in the industry and to uplift the image of HOTCATT. GIMPA was to introduce basic, supervisory and executive programmes to help improve standards in the industry.

However, two years later, no much had been achieved. This was attributed to GIMPA's misunderstanding of the MOU and hence its inability to achieve the original objectives. The government set up an inter-ministerial committee to investigate the situation and the outcome was that the MOU was abrogated and HOTCATT reverted back to government.

HOTCATT is in a period of transition. Currently there is no board of directors. Of the 10 instructors that they should have, just three are permanent staff and the Institute is obliged to bring in temporary instructors when it has a programme to deliver. At the moment, the Institute is running short courses for industry. In 2011, just 270 students were trained.

Government owns the building where HOTCATT is located. Key informants interviewed for this study felt that government should continue to run the Institute to ensure that training stays affordable but should be supported by the private sector in a Public Private Partnership (PPP) arrangement. A Cabinet Memorandum on the future of HOTCATT is currently pending decision.

Tourism Development Fund

One of the most important articles in the Tourism Act, 2011 is the establishment of the Tourism Development Fund, effectively allowing the GTA to administer its own revenue from five sources:

- Seed capital from the Government
- One per cent levy payable by a patron of a tourism enterprise specified in the Schedule
- Donations and grants
- Moneys earned by the operation of any project, enterprise financed from the Fund or investments, and
- Other moneys that the Minister for Finance in consultation with the Minister may
- Determine with the approval of Parliament

The fund is to be used for:

- Marketing and promotion of tourism
- Capacity building, market research and development of infrastructure
- Development and promotion of other entrepreneurial activities
- Tourism export trade-oriented activities of institutions
- Tourism education and training

It is administered by the GTA Board and a representative of the Controller of the Account General. It is estimated that the 1% levy accrues millions of cedis from the monthly collection by star-rated hotels on room rates alone not counting catering and other services.

Ghana Museums and Monuments Board (GMMB)

The Ghana Museums and Monuments Board (GMMB) is the legal custodian of Ghana's material cultural heritage (movable and immovable heritage). The Board was established in March 1957 – on the eve of Ghana's independence - as a result of the merger of the then interim Council of the National Museum of the Gold Coast and the Monuments and Relics Commission. The GMMB is governed by the National Liberation Council Decree (NLCD) 387 of 1969, now known as Act 387 of 1969, which was further strengthened by the Executive Instrument (E.I.) 29 of 1973.

The Ghana Museums and Monuments Board undertakes the following functions/activities:

- Equipping and managing all material cultural (movable and immovable) heritage of the nation
- Establishing, equipping and managing new museums
- Controlling the export, import, sale and change of ownerships of material cultural property through licensing and issuance of permits
- Establishing a National Register and keeping inventory of all material cultural (movable and immovable) heritage of Ghana
- Identifying and recommending for declaration as national monuments, structures, objects and sites of historical and cultural significance
- Undertaking research and publication of all matters relating to material cultural (movable and immovable) heritage.

The Ghana Museums and Monuments Board comprises two main divisions: The Museums and the Monuments Divisions. These divisions are supported by three auxiliary departments:

- Education and Interpretive Department
- Administration and Finance Department
- Public Relations/Marketing Department

Forestry Commission

The Forestry Commission of Ghana is responsible for the regulation of utilization of forest and wildlife resources, the conservation and management of those resources and the coordination of policies related to them. The Commission embodies the various public bodies and agencies that were individually implementing the functions of protection, management, the regulation of forest and wildlife resources. These agencies currently form the divisions of the Commission:

- Forest Services Division (FSD)
- Wildlife Division
- Timber Industry Development Division (TIDD)
- Wood Industries Training Centre (Forestry Commission Training School)
- Resource Management Support Centre (RMSC)

The Wildlife Division is responsible for the management of the conservation areas in the country including the Ankasa and Kakum parks. It is the aim of the Commission to be a corporate body of excellence in the sustainable development management and utilization of Ghana's forest and wildlife resources meeting both national and global standards for forest and wildlife resource conservation and development.

Lands Commission

The Land Valuation Division (LVD) is the statutory body ensuring that land required for projects are properly acquired and also transparent procedures are followed and fair and adequate compensation is paid. Though private firms may be invited to participate in the process, in case of disputes, the LVD would assist to ensure prompt settlement.

Environmental Protection Agency

The Environmental Protection Agency is the body responsible for ensuring compliance with laid down ESIA procedures in Ghana in accordance with the EPA Act 1994 (Act 490) and its amendment and Agency is expected to give environmental approval for Projects. The ESIA is being applied in Ghana to development projects as well as other undertakings as an environmental permitting pre-requisite and a major environmental management tool. The EPA is represented in all the ten (10) regions of the country and will support the project by exercising its permitting and monitoring powers. Though the Agency's technical capacity may be adequate there is some concern with regard to logistics especially transport and personnel which may therefore limit its effectiveness.

The Ghana EA procedures are largely in agreement with the World Bank policies and procedures and the former is now well entrenched in the country to assure satisfactory environmental and social performance of the potential projects to be developed under this project.

Metropolitan, Municipal and District Assemblies (MMDAs)

The Ministry of Local Government and Rural Development (MLGRD) exists to promote the establishment and development of a vibrant and well-resourced decentralized system of local government for the people of Ghana to ensure good governance and balanced rural based development. The Government of Ghana has been pursuing a policy of decentralisation to:

- Establish institutions through regional participation in decision making, and
- Devolve power and authority to the local level

Civil society

Several non-governmental organizations (NGO) have been quite active in the tourism sector over the years and have worked with government institutions to develop and in some cases manage tourism

activities in Ghana.

In the Central Region, the *Ghana Heritage Conservation Trust (GHCT)*, a not for profit NGO, was established in August 1996 to consolidate and further the progress made through the Natural Resources Conservation and Historic Preservation (NRCHP) Project, initiated by the Central Regional Administration in 1989. Its mission is to support and assist in the conservation, protection and maintenance of the Cape Coast and Elmina Castles and the Fort St. Jago, as well as the Kakum Conservation Area where they manage the tourism facilities with the Wildlife Division. As such they are geographically focussed within a part of the Central Region, although their goal is to be able to extend their conservation activities to other parts of the region and to Ghana as a whole, if possible. The *Ghana Wildlife Society* is a national environmental NGO that focuses on Education and Public Awareness, Development and Conservation projects throughout Ghana. It manages two community-based tourism initiatives: the visits to the Nzulezu village on stilts in Western Region near Beyin as part of the Amansuri Conservation and Integrated Development (ACID) and community-based eco-tourism as an alternative to farming and tree cutting in the forest at Afadjato in the Volta Region and part of the Afadjato Community Forest Conservation Project.

Over the years, NGO's such Nature Conservation Resource Centre (NCRC), Ghana Rural Ecotourism and Travel Office (GREET), Ricerca e Cooperazione (RC), Netherlands Development Organisation (SNV), Cooperazione per lo Sviluppo dei Paesi Emergenti (COSPE) have been involved in projects to increase the participation of local communities in the tourism sector.

Traditional rulers and chiefs

Traditional rulers are important to tourism development as often they own or control land that may be appropriate for tourism development, have strong ideas and opinions about what should be developed in their jurisdiction and can strongly influence local communities. Tourism should always be developed with the acceptance participation of the local communities living in the area. Where there is conflict between local chiefs, this often affects tourism development and community participation.

4.1 World Bank Safeguards Policies

The World Bank (WB) has published policies/procedures to guide the safe development of projects it is funding. Two (2) of the ten (10) WB Safeguards Policies, OP 4.01 (Environmental Assessment) and OP 4.12 (Involuntary Resettlement) are triggered by the proposed project. The WB safeguards policies and a summary of their core requirements are provided in Table 3-1.

Table 2: Summary of World Bank Safeguard Policies

No	World Bank Safeguard Policy	Summary of core requirements	Remarks or recommendation for proposed project
1	OP 4.01 Environmental Assessment	<p>Requires environmental assessment (EA) of projects proposed for Bank financing to help ensure that they are environmentally sound and sustainable, and thus to improve decision making. The EA takes into account the natural environment (air, water, and land); human health and safety; social aspects (involuntary resettlement, indigenous peoples, and physical cultural resources); and trans boundary and global environmental aspects. It categorizes proposed projects into categories A, B, C or FI based on the extent of adverse impacts anticipated from the project.</p> <p>For Category A and B projects, an ESMP is to be prepared to guide the Implementation of mitigation measures for all identified environmental impacts from the proposed warehouse project.</p>	<p>OP 4.01 is triggered to address expected risk and impacts from the development of small infrastructure and services such as last-mile road access, electricity hookups, potable water, drainage and sanitation facilities in strategically selected sites.</p> <p>An ESMF has been prepared to provide guidance for the implementation of such sub-projects. The World Bank Group EHS guidelines have been incorporated in the ESMF to provide guidance for health and safety issues during the construction phase of the project.</p>
2	OP 4.04: Natural Habitats	<p>Do not finance projects that degrade or convert critical habitats. Support projects that affect non-critical habitats only if no alternatives are available and if acceptable mitigation measures are in place. The policy strictly limits the circumstances under which any Bank-supported project can damage natural habitats (land and water areas where most of the native plant and animal species are still present).</p>	<p>Natural Habitat OP 4.04 is triggered to address expected risk and impacts from the development of lodging and visitor's facilities in National Parks and protected areas.</p>

No	World Bank Safeguard Policy	Summary of core requirements	Remarks or recommendation for proposed project
3	OP 4.09: Pest Management	Support integrated approaches to pest management, identify pesticides that may be financed under the project and develop appropriate pest management plan to address this.	The project will not involve the use of pesticides.
4	OP 4.36: Forest	Aim is to reduce deforestation, enhance the environmental contribution of forested areas, promote afforestation, reduce poverty, and encourage economic development. Support sustainable and conservation oriented forestry. Do not finance projects that involve significant conversion or degradation of critical forest areas.	OP4.36 (Forests) is triggered to deal with such sub-project activities to be undertaken within projected forest reserves such as Ankasa.
5	OP 4.11: Physical Cultural Resources	Investigate and inventorise cultural resources potentially affected. Include mitigation measures when there are adverse impacts on physical cultural resources or avoid if possible	OP 4.11 is triggered to address expected risk and impacts from sub-project activities within cultural heritage sites and a physical cultural resources plan has been prepared and attached as Annex 8.
6	OP 4.12: Involuntary Resettlement	Assist displaced persons in their effort to improve or at least restore their standards of living. Avoid resettlement where feasible or minimise. Displaced persons should share in project profits. The policy aims to avoid involuntary resettlement to the extent feasible, or to minimize and mitigate its adverse social and economic impacts. The policy prescribes compensation and other resettlement measures to achieve its objectives and requires that borrowers prepare adequate resettlement planning instruments prior to Bank appraisal of proposed projects.	OP 4.12 is triggered to deal with any Physical relocation loss of land resulting in: – Relocation or loss of shelter – Loss of assets or access to assets – Loss of income sources or means of livelihood (whether or not the affected people must move to another location) Access to legally-designated parks in

No	World Bank Safeguard Policy	Summary of core requirements	Remarks or recommendation for proposed project
			protected areas is restricted, resulting in adverse livelihood impacts through restrictions on the use of resources.
7	OP 4.10: Indigenous Peoples	Screen to determine presence of indigenous peoples in project area. Policy triggered whether potential impacts are positive or negative. Design mitigation measures and benefits that reflect indigenous peoples' cultural preferences.	No indigenous groups were identified.
8	OP 4.37: Safety of Dams	Requires that experienced and competent professionals design and supervise construction, and that the borrower adopts and implements dam safety measures through the project cycle. The policy distinguishes between small and large dams by defining small dams as those normally less than 15 meters in height. Large dams are 15 meters or more in height.	The proposed project does not involve the construction of dams.
9	OP 7.50: Projects on International Waterways	Ascertain whether riparian agreements are in place, and ensure that riparian states are informed of and do not object to project interventions.	The proposed project does not involve international waters.
10	OP 7.60: Projects in Disputed Areas	Ensure that claimants to disputed areas have no objection to proposed project.	No issues of land dispute are expected.

Environmental, Health and Safety Guidelines

The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable cost. Application of the WB EHS Guidelines to existing facilities may involve the establishment of site-specific targets, with an appropriate timetable for achieving them. The Ghana EPA has general and sector specific guideline

values for effluents, noise, air quality and other environmental parameters. These are consistent with the principles under which the WB EHS guidelines have been prescribed and take cognizance of the country context, assimilative capacity of the Ghanaian environment and other socio- economic factors. The project will therefore mostly refer to the Ghana EPA standards for guidance. However, where the Ghana regulations differ from the levels and measures presented in the EHS Guidelines, projects are expected to achieve whichever is more stringent. If less stringent levels or measures than those provided in these EHS Guidelines are appropriate, in view of specific project circumstances, a full and detailed justification for any proposed alternatives is needed as part of the site-specific environmental assessment. The justification will demonstrate that the choice for any alternate performance levels is protective of human health and the environment.

5 GENERIC RISKS AND IMPACTS

These mitigation guidelines are given to address the significant impacts. The responsibilities for implementing these measures are described later in the report.

The activities in Component 2 will involve provision of infrastructural services (civil works support ranging from rehabilitation of yet-to-be identified existing sites, to new and yet to be identified sites). The potential project infrastructure to be provided may involve the following activities:

- Rehabilitation and refurbishment of old heritage buildings
- Construction and upgrading of private and public buildings
- Construction and Upgrading of access roads
- De- silting of waterways and widening of river channels etc
- Construction of water associated infrastructure such as bridges, jetties
- Relocation of settlements
- Solid waste management
- Provision of public sanitation facilities (toilets, urinals etc)

Table 3: Environmental and social mitigation measures

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
<i>Water Resources and pollution</i>	<p><u>Construction stage</u></p> <ul style="list-style-type: none"> ✓ Works not to be executed under aggressive weather conditions such as rains or stormy conditions. ✓ No solid waste, fuels, or oils to be discharged into any section of a waterway. ✓ Construction to be done in sections to minimize impacts and exposure of soil. ✓ Excavated materials and silt, which cannot be used will be disposed of at appropriate sites as per the Waste Management Plan prepared by contractor and approved by the Assembly. ✓ Temporary sediment barriers to be installed on slopes to prevent silt from entering water courses. ✓ Maintenance, fueling and cleaning of vehicles and equipment to take place at off-site workshop with adequate leakage prevention measures <p><u>Operational stage</u></p> <ul style="list-style-type: none"> ✓ Adequate sanitary facilities to be provided at tourist sites to avoid discharge of waste into water bodies ✓ Host communities to be provided with sufficient toilet facilities and sensitized to use these to discourage open defecation
<i>Air quality</i>	<p><u>Construction stage</u></p> <ul style="list-style-type: none"> ✓ Soil/sand 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. ✓ Construction and civil works to be phased out or controlled to reduce emissions from equipment and machinery in use. <p><u>Operational stage</u></p> <ul style="list-style-type: none"> ✓ Adequate road signs to be planted on dust roads to limit vehicular speeds ✓ Properly designed and constructed speed ramps on access roads
<i>Vibration and Noise</i>	<p><u>Construction phase</u></p> <ul style="list-style-type: none"> ✓ Excavation and construction activities to be carried out during daylight hours. ✓ Concrete mixer and other construction machines and equipment to be located away from sensitive environmental receptors. ✓ 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 activities to be phased out or controlled to reduce noise generation during construction.

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
	<ul style="list-style-type: none"> ✓ Neighboring residents and commercial activities to be notified in advance of the project before contractor mobilizes to site ✓ Work will not be carried out during sensitive times/ periods of day/ year to avoid disturbance to fauna <p><u>Operational phase</u></p> <ul style="list-style-type: none"> ✓ Visible signs to be provided at suitable locations to warn tourists of excessive noise which may disturb fauna or other activities
<u>Visual intrusion</u>	<ul style="list-style-type: none"> ✓ Public to be well informed of upcoming project using appropriate signages and display boards prior to contractor accessing sites; ✓ Construction activities to be done in sections to reduce impacts of change and visual intrusions to the general public. ✓ The construction sites to be hoarded off from public view. ✓ Good housekeeping measures, such as regular cleaning, to be maintained at the construction site. ✓ Ensure an acceptable post-construction site as per provisions in the contract. ✓ Tourist facilities will be properly designed and constructed to blend with the natural environment
<u>Land acquisition and compensation issues</u>	<ul style="list-style-type: none"> ✓ Consult affected property owners/users/ communities and seek their consent early in the project development process ✓ Allow affected persons to salvage their properties (including crops) before mobilizing to site to start work ✓ Ensure fair and adequate compensation is paid to all affected persons prior to commencement of construction activities as per the provisions of the RPF ✓ Obtain the required developmental permits from the respective Assemblies before start of work
<u>Generation and disposal of solid wastes</u>	<p>Apply the principles of Reduce, Recycle, Reuse and Recover for waste management through the following actions:</p> <p><u>Construction phase</u></p> <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. ✓ Ensure judicious use of construction materials such as pipes, laterites, sand, etc. to reduce 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.

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
	<ul style="list-style-type: none"> ✓ Contractor to work according to a prepared and agreed Solid Waste Management Plan. <p><u>Operational phase</u></p> <ul style="list-style-type: none"> ✓ Waste collection bins to be sited at vantage points to serve the general public ✓ Warning signs to be posted at suitable locations against littering with possible sanctions ✓ Proper arrangement with waste collection companies through the Assembly to regularly collect and dispose of solid waste
<u>Maintaining Livelihoods</u>	<ul style="list-style-type: none"> ✓ Ensure appropriate compensations are paid to PAPs as defined in the RPF; ✓ Employment and other opportunities to be given to local communities as much as possible. ✓ GTA to organize training programs for community management teams at tourist sites to encourage professionalism ✓ GTA to actively solicit private sector investment in the identified project areas and at suitable areas encourage partnership with host communities ✓ Activities of beggars and idlers at tourist sites not to be entertained. Site managers to discuss possible alternative livelihood options and other arrangements with local communities
<u>Public Health and Safety, and Security</u>	<p><u>Construction phase</u></p> <ul style="list-style-type: none"> ✓ Works on exposed trenches and earth materials will, as much as possible, be completed before new earth dug and trenches are created. ✓ Work areas to be hoarded off adequately to avoid inquisitive trespassers especially children ✓ Warning signs to be posted around work areas to discourage trespassers ✓ Contractors to maintain adequate security at construction sites to avoid pilfering or vandalising of property ✓ Visibility to be ensured in the night time by providing adequate lighting <p><u>Operational phase</u></p> <ul style="list-style-type: none"> ✓ Encourage community leadership to form watch committees to improve security ✓ Work with police force to provide police posts at all major tourist sites ✓ First aid facilities to be available at all sites with suitable arrangements with local health facilities to deal with emergencies
<u>Traffic management</u>	<ul style="list-style-type: none"> ✓ Contractors to provide traffic management plans to be approved by relevant authorities ✓ Adequate alternative arrangements to be made to minimize impact on motorist and pedestrians ✓ Works to be completed on time to minimize inconvenience to motorists and pedestrians <p><u>Operational stage</u></p> <ul style="list-style-type: none"> ✓ Adequate road signs to be planted on access roads to limit vehicular speeds ✓ Construct properly designed speed ramps on access roads

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
<p><u>Occupational health and safety</u></p>	<p><u>Construction phase</u></p> <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. <p><u>Operational phase</u></p> <ul style="list-style-type: none"> ✓ Park wardens to be provided PPEs for protection against dangerous animals ✓ Park wardens to be suitably armed for protection against poachers ✓ First aid facilities to be available at all sites with suitable arrangements with local health facilities to deal with emergencies
<p><u>Cultural Heritage</u></p>	<ul style="list-style-type: none"> ✓ Traditional authority responsible for sanctity of local shrines properly identified and consulted ✓ Necessary cultural rites agreed with community and performed prior to access to sites

6 FRAMEWORK ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (F-ESMP)

Environmental and social mitigation measures

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
Water Resources and pollution	<p><u>Construction stage</u></p> <ul style="list-style-type: none"> ✓ Works not to be executed under aggressive weather conditions such as rains or stormy conditions. ✓ No solid waste, fuels, or oils to be discharged into any section of a waterway. ✓ Construction to be done in sections to minimize impacts and exposure of soil. ✓ Excavated materials and silt, which cannot be used will be disposed of at appropriate sites as per the Waste Management Plan prepared by contractor and approved by the Assembly. ✓ Temporary sediment barriers to be installed on slopes to prevent silt from entering water courses. ✓ Maintenance, fuelling and cleaning of vehicles and equipment to take place at off-site workshop with adequate leakage prevention measures <p><u>Operational stage</u></p> <ul style="list-style-type: none"> ✓ Adequate sanitary facilities to be provided at tourist sites to avoid discharge of waste into water bodies ✓ Host communities to be provided with sufficient toilet facilities and sensitized to use these to discourage open defecation
Air quality	<p><u>Construction stage</u></p> <ul style="list-style-type: none"> ✓ Soil/sand 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. ✓ Construction and civil works to be phased out or controlled to reduce emissions from equipment and machinery in use. <p><u>Operational stage</u></p> <ul style="list-style-type: none"> ✓ Adequate road signs to be planted on dust roads to limit vehicular speeds ✓ Properly designed and constructed speed ramps on access roads
Vibration and Noise	<p><u>Construction phase</u></p> <ul style="list-style-type: none"> ✓ Excavation and construction activities to be carried out during daylight hours.

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
	<ul style="list-style-type: none"> ✓ Concrete mixer and other construction machines and equipment to be located away from sensitive environmental receptors. ✓ 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 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 ✓ Work will not be carried out during sensitive times/ periods of day/ year to avoid disturbance to fauna <p><u>Operational phase</u></p> <ul style="list-style-type: none"> ✓ Visible signs to be provided at suitable locations to warn tourists of excessive noise which may disturb fauna or other activities
Visual intrusion	<ul style="list-style-type: none"> ✓ Public to be well informed of upcoming project using appropriate signages and display boards prior to contractor accessing sites; ✓ Construction activities to be done in sections to reduce impacts of change and visual intrusions to the general public. ✓ The construction sites to be hoarded off from public view. ✓ Good housekeeping measures, such as regular cleaning, to be maintained at the construction site. ✓ Ensure an acceptable post-construction site as per provisions in the contract. ✓ Tourist facilities will be properly designed and constructed to blend with the natural environment
Land acquisition and compensation issues	<ul style="list-style-type: none"> ✓ Consult affected property owners/users/ communities and seek their consent early in the project development process ✓ Allow affected persons to salvage their properties (including crops) before mobilizing to site to start work ✓ Ensure fair and adequate compensation is paid to all affected persons prior to commencement of construction activities as per the provisions of the RPF ✓ Obtain the required developmental permits from the respective Assemblies before start of work
Generation and disposal of solid wastes	<p>Apply the principles of Reduce, Recycle, Reuse and Recover for waste management through the following actions:</p> <p><u>Construction phase</u></p> <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

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
	<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. ✓ Ensure judicious use of construction materials such as pipes, laterites, sand, etc. to reduce 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. ✓ Contractor to work according to a prepared and agreed Solid Waste Management Plan. <p><u>Operational phase</u></p> <ul style="list-style-type: none"> ✓ Waste collection bins to be sited at vantage points to serve the general public ✓ Warning signs to be posted at suitable locations against littering with possible sanctions ✓ Proper arrangement with waste collection companies through the Assembly to regularly collect and dispose of solid waste
Maintaining Livelihoods	<ul style="list-style-type: none"> ✓ Ensure appropriate compensations are paid to PAPs as defined in the RPF; ✓ Employment and other opportunities to be given to local communities as much as possible. ✓ GTA to organize training programs for community management teams at tourist sites to encourage professionalism ✓ GTA to actively solicit private sector investment in the identified project areas and at suitable areas encourage partnership with host communities ✓ Activities of beggars and idlers at tourist sites not to be entertained. Site managers to discuss possible alternative livelihood options and other arrangements with local communities
Public Health and Safety, and Security	<p><u>Construction phase</u></p> <ul style="list-style-type: none"> ✓ Works on exposed trenches and earth materials will, as much as possible, be completed before new earth dug and trenches are created. ✓ Work areas to be hoarded off adequately to avoid inquisitive trespassers especially children ✓ Warning signs to be posted around work areas to discourage trespassers ✓ Contractors to maintain adequate security at construction sites to avoid pilfering or vandalising of property ✓ Visibility to be ensured in the night time by providing adequate lighting <p><u>Operational phase</u></p> <ul style="list-style-type: none"> ✓ Encourage community leadership to form watch committees to improve security ✓ Work with police force to provide police posts at all major tourist sites ✓ First aid facilities to be available at all sites with suitable arrangements with local health facilities to deal with emergencies
Traffic management	<ul style="list-style-type: none"> ✓ Contractors to provide traffic management plans to be approved by relevant authorities ✓ Adequate alternative arrangements to be made to minimize impact on motorist and pedestrians ✓ Works to be completed on time to minimize inconvenience to motorists and pedestrians

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
	<u>Operational stage</u> ✓ Adequate road signs to be planted on access roads to limit vehicular speeds ✓ Construct properly designed speed ramps on access roads
Occupational health and safety	<u>Construction phase</u> ✓ 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. <u>Operational phase</u> ✓ Park wardens to be provided PPEs for protection against dangerous animals ✓ Park wardens to be suitably armed for protection against poachers ✓ First aid facilities to be available at all sites with suitable arrangements with local health facilities to deal with emergencies
Cultural Heritage	✓ Traditional authority responsible for sanctity of local shrines properly identified and consulted ✓ Necessary cultural rites agreed with community and performed prior to access to sites

The Environmental and Social Management Framework (ESMF) provides guidance to the Project on procedures to be followed and standards to be met in implementing the projects in agreement with national and World Bank safeguard provisions. Roles and responsibilities of the implementing agencies and other collaborating agencies are clearly defined as well as monitoring protocols to be followed to ensure that the required provisions are adhered to. Finally, budgetary estimates will be required to support the implementation of the environmental and social management plan.

The ESMF will be included in the project's Manual of Operations. The ESMF outlines mechanisms for:

- Screening of proposed project interventions, identifying potential environmental and social impacts and management of safeguard policies implications;
- Arrangements by MoTAC and other relevant institutions for implementation and their capacity building;
- Monitoring ESMF measures implementation;
- Community consultations;
- The estimated costs related to the ESMF.

6.1 The Environmental and Social Screening 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.

The Regional GTA focal person must foremost carry out the preliminary environmental and social screening of proposed projects by using the checklist suggested in **Annex 1**. He will jointly carry out the exercise with the sub- project safeguard person and in close consultation with the respective MMDA. 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), the Regional GTA focal person must consult internally with the person responsible for safeguards at the Project Implementation Unit at MoTAC for confirmation. Once an agreement is reached, the Regional GTA safeguard person may proceed with the minimum regular reporting requirements which will be discussed and agreed with the PIU safeguard person.

When there may be doubts concerning project risks and impacts, the Regional GTA Safeguard person should consult the regional EPA for guidance as provided by the Ghana EA procedures, and in consultation with the PIU.

6.2 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. These have been given in the **Annex 2** and are consistent with the World Bank categorization of projects.

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

Step 1: Environmental Registration of the Project

Each of the Regional GTA will designate an Environmental and Social Safeguard Officer from within the regional project team. The appointed/ designated Officer 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 have completed.

A sample copy for the screening form is given as **Annex 1** and the EA1 Form is provided in **the Annex 3** and the mitigation measures suggested in this ESMF as well as the checklist used in the screening exercise should assist the Regional GTA Safeguard Person to complete this Form. For projects for which EIA are mandatory, the Regional GTA Safeguard officer should register with Form EA1 otherwise Form EA2 should be used.

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 **Annex 4**. 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 regional GTA team may move to implementation 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 an ESIA (WB Category B and A Projects), standalone reports will be prepared. The Ghana EPA statutorily requires an EIA for projects in sensitive areas as listed in **Annex 5**.

The Regional GTA Safeguard Officer in consultation with the PCU/MoTAC safeguard person, 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 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 Regional GTA will submit the draft ESIA to EPA on approval by the PCU/MoTAC. 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.

Environmental Permitting Decision (EPD)

Where the draft ESIA is found acceptable, the regional GTA will be notified through the PCU/MoTAC 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/ MoTAC 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.

The following processes are important and are provided:

Table 4: Summary of Environmental Screening Process and Responsibilities

No	Steps/Activities	Responsible	Collaboration	Service Provider
1.	Identification and/or siting of the sub-project	SFP- GTA	<ul style="list-style-type: none"> • PCU • R-GTA • ESS/SSS-PCU • SFP-MMDAs • SFP-PS 	EPA
2.	Environmental and Social screening of proposed project intervention to assist in project formulation using E&S checklist	<ul style="list-style-type: none"> • ESS/SSS-PCU • 	<ul style="list-style-type: none"> • PCU • GTA • ESS/SSS-PCU • SFP-MMDAs • SFP-PS 	WB
3.	categorization and identification of the required instrument (use the national EIA procedure)	• ESS/SSS-PCU	<ul style="list-style-type: none"> • PCU • GTA • ESS/SSS-PCU • SFP-MMDAs • SFP-PS 	EPA WB
4.	Approval of the classification and the selected instrument by the Public EA Agency	PC -PCU	<ul style="list-style-type: none"> • ESS-PCU • SSS- PCU 	<ul style="list-style-type: none"> • EPA • The World Bank
5	Preparation of the safeguard document/instrument (ESIA, Env. Audit, simple ESMP, etc.) in accordance with the national legislation/procedure (taking into account the Bank policies requirements)			
6	Preparation and approval of the ToRs	• ESS/SSS-PCU	<ul style="list-style-type: none"> • Procurement specialist (PS-PCU) • SFP- GTA • SFP-MMAs • SFP-PS 	• The World Bank
	Preparation of the report			• Consultant
	Report validation and issuance of the permit (when required)		<ul style="list-style-type: none"> • PS-PCU • FS-PCU • MMDAs 	<ul style="list-style-type: none"> • EPA • The World Bank • GTA • GNFS • MMDAs • GPS
	Disclosure of the document		PC-PCU	<ul style="list-style-type: none"> • Media; • The World Bank
7.	(i) Integrating the construction phase mitigation measures and		<ul style="list-style-type: none"> • ESS/SSS-PCU • 	<ul style="list-style-type: none"> • Control Firm (Supervisor) • MMDAs

	E&S clauses in the bidding document prior they're advertised; (ii) ensuring that the constructor prepares his 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 sub-project (TS-PCU)		
8	Development of monitoring indicators	M&E-PCU	<ul style="list-style-type: none"> • ESS/SSS-PCU 	<ul style="list-style-type: none"> •
9.	Implementation of the other safeguards measures, including environmental monitoring (when relevant) and sensitization activities	ESS/SSS-PCU	<ul style="list-style-type: none"> • TS-PIE • PS-PCU • FS-PCU • MMDAs • 	<ul style="list-style-type: none"> • Consultant • National specialized laboratories • NGOs • CBOs
10.	Oversight of safeguards implementation (internal)	ESS/SSS-PCU	<ul style="list-style-type: none"> • M&E-PCU • PCU • GTA • ESS/SSS-PCU • SFP-MMDAs • SFP-PS 	<ul style="list-style-type: none"> • Control Firm (Supervisor)
	Reporting on project safeguards performance and disclosure	PC-PCU	<ul style="list-style-type: none"> • M&E-PCU • ESS-PCU • SSS-PCU 	WB
	External oversight of the project safeguards compliance/performance	EPA	<ul style="list-style-type: none"> • M&E-PCU • ESS-PCU • SSS-PCU • Supervisor 	
11.	Building stakeholders' capacity in safeguards management	ESS/SSS-PCU	<ul style="list-style-type: none"> • PS-PCU 	<ul style="list-style-type: none"> • WB • Consultant • Other qualified public institutions
12.	Independent evaluation of the safeguards performance (Audit)	ESS/SSS-PCU	<ul style="list-style-type: none"> • PS-PCU 	<ul style="list-style-type: none"> • Consultant

6.3 Public communication and consultation mechanism/plan

The World Bank policies require that environmental reports for projects are made available to project affected groups, local NGOs, and the public at large. Public disclosure of ESIA documents or environmental reports is also a requirement of the Ghana ESIA procedures. MoTAC and EPA will make copies of the ESMF available in selected public places as required by law for information and comments. Public notice in the media will serve that purpose.

The notification will be done through newspaper advertisements and provide:

- Brief description of the Project;
 - List of venues where the ESMF report is on display and available for viewing;
 - Duration of the display period;
- Contact information for comments.

The EPA will assist to select display venues upon consultation with MoTAC.

6.4 **Specific and target capacity building**

The capacity of the various players both at MoTAC and GTA to implement the ESMF is doubtful. There is the need to equip identified persons with the understanding, skills and access to information, knowledge and training to enable them to perform effectively as safeguard persons.

The capacity building will include training workshops and production of guidance reports and tools.

The following training programmes are recommended:

Table 5: Training modules and proposed participants

No	Training content	Participants
1.	<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 	MoTAC PCU PCU safeguard specialist, GTA head office GTA regional safeguard persons
2.	<ul style="list-style-type: none"> • Screening Checklist, • ToR for MoTAC PCU safeguard person • ToR for Regional GTA Safeguard focal persons • Completion of EA Registration Forms 	GTA regional safeguard persons, PCU safeguard specialist
3.	<ul style="list-style-type: none"> • Preparation of Terms of Reference for ESIA's and RAPs 	GTA regional safeguard persons, PCU safeguard specialist
4.	<ul style="list-style-type: none"> • Environmental and Social Management Plans • Grievance redress registration and resolution forms 	GTA regional safeguard persons, Contractors, Supervising engineers,

		Tourist site managers (including WD, GMMB) CSOs (eg. GHCT) MMDAs Community persons
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The main recipients for training at the highest level will be the PCU/ MoTAC and the GTA staff. Further down the scale, the tourist site managers (from Wildlife Division, Ghana Museums and Monuments and CSOs eg. Ghana Heritage Conservation Trust) and MMDAs will also benefit from training though the content will be different. The latter will be exposed to environmental and social management plans prepared for the sub projects.

The training may be organized in collaboration with the regional EPA and will be in the form of seminars and workshops.

The possibility of decentralizing the training sessions to the regional level will be explored so that safeguard persons may have sessions specific to their activities. Large numbers of participants at specific training sessions will be avoided.

The implementation of the training and awareness creation will be timely and therefore planned during the early stages of the Program to ensure that all actors are ready when the sub- projects roll out. Periodically, during the execution of the projects the safeguard persons may congregate to share ideas and learn lessons from each other. It is expected that participants would at the end of the training be in a position to deal more effectively with difficult environmental and social challenges that they may come across.

Production of guidelines and tools

The ESMF provides guidelines to mitigate adverse environmental and social impacts arising out project implementation. Training manuals and checklists are required to assist safeguard focal points to carry out their functions. Such checklist and manuals will include those designed for environmental and social screening of projects. Consultants may be hired to produce manuals and checklists as and when required by the project.

6.5 Grievance mechanism

The grievance redress approach proposes three interlinked steps: (i) a risk-based assessment of potential grievances, disputes or conflicts that may arise during project preparation and implementation; (ii) identification of the client’s existing capacity for grievance redress; and (iii) an action plan that identifies priority areas for strengthening grievance capacity, or if necessary, establishing new mechanisms at the project level. Where applicable, dedicated resources should be allocated for realization of the action plan.

General grievance/ disputes

Grievances and disputes may arise due to one or more of the following situations:

- Disagreement on community land or property boundaries;
- Disagreement on plot/property valuation and valuation rates applied;
- Mistakes in inventorying or valuing properties;
- Disputed ownership of a given asset (two or more people in the community claiming ownership of an affected property);
- Successions, divorces, and other family issues resulting in disputed ownership or disputed shares between inheritors or family members;
- Disagreement on resettlement package (e.g. location of resettlement site not being suitable to them, proposed housing or resettlement plot characteristics/agricultural potential not adequate or suitable);
- Disputed ownership of businesses and business related assets (e.g. owner and operator of a business may be distinct individuals, which gives rise to disputes in the event of compensation).

Objective

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.

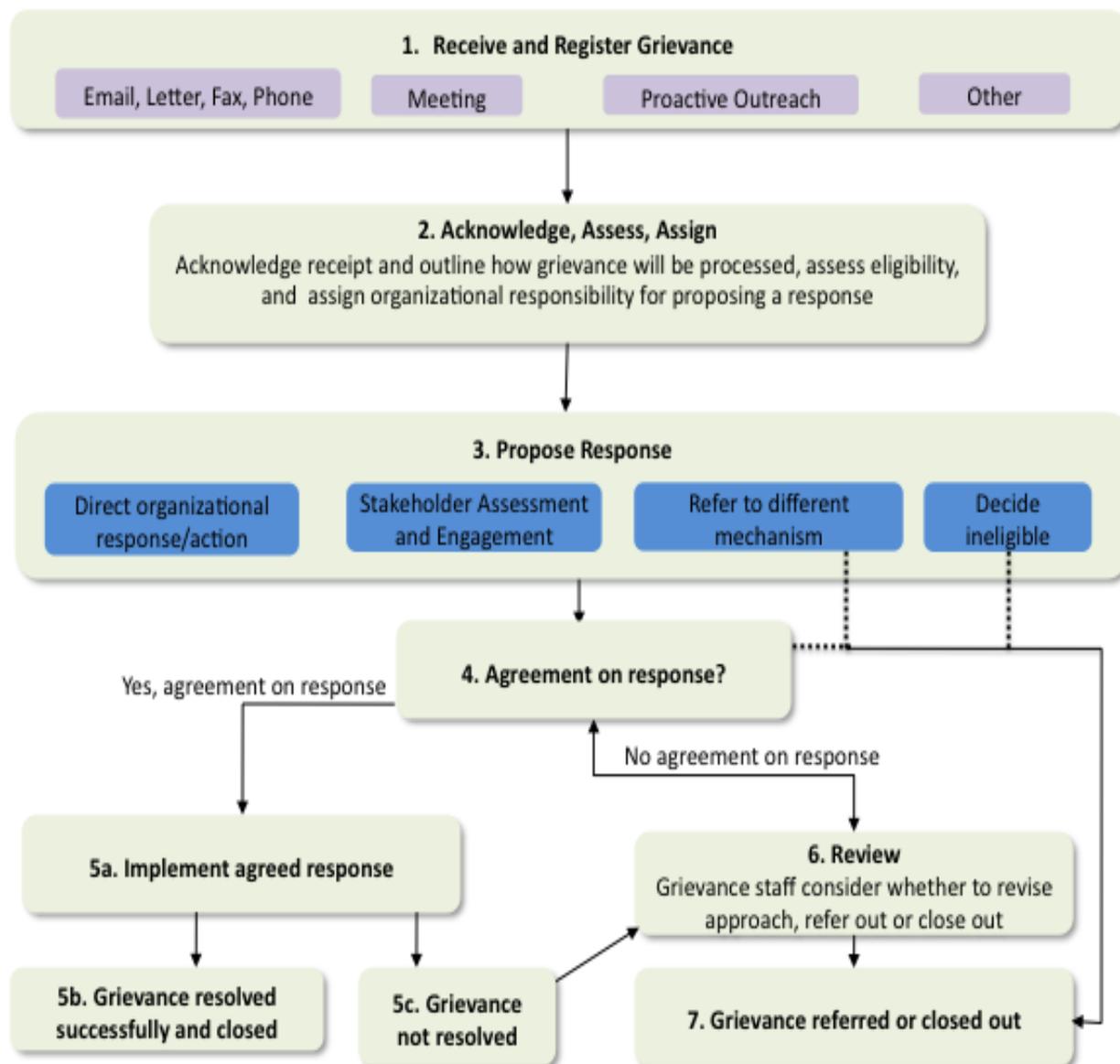
Court cases are known to be cumbersome and take a long time before settlements are reached and usually one party is still not satisfied. It is therefore proposed to adopt a simple procedure for affected persons to be able to follow easily, and which will provide aggrieved people with an avenue for amicable settlement without necessarily opening a Court case.

Proposed grievance management and redress mechanism

As a first option, the ESMF proposes amicable settlement/ mediation.

In compensation and resettlement operations, it often appears that many grievances derive from misunderstandings of project policy and procedures, land/asset valuations, property demarcations and boundaries among other as mention above, which can usually be solved through adequate mediation using customary rules and some mediation. This is why a first instance of dispute handling will be set up with the aim of settling disputes amicably.

A Dispute Resolution Mechanism (DRM) applied successfully in other sectors which is applicable to this project is adopted and presented below:



Source: Proposed DRM model for REDD+ presented at the SESA Workshop in Kumasi- Ghana, July 2014

The proposed DRM 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.

The proposed DRM may consider various levels of institutional arrangements in addressing the disputes/grievance and these include:

- Options 1: Resolve disputes/ grievance within
 - Community level
 - Regional level (GTA regional office)
 - National level (MoTAC PCU)

- Option 2: refer to outside bodies
 - Use or delegate functions to Alternative Dispute Resolution (ADR) centres

Details of the grievance resolution process, institutional arrangements, composition, and capacity needs requirements for all the levels (community, regional, national) are all provided in the RPF which may be a useful document for addressing grievances and disputes under the project.

Dissatisfaction and alternative actions

Courts of law will be a “last resort” option, which in principle should only be triggered where first instance amicable mechanisms and review processes have failed to settle the grievance/dispute. However, the Constitution allows any aggrieved person the right of access to Court of law.

Documentation and tracing

Annex 7 presents a template form for the grievance reporting and resolution. The Grievance Redress Management team at each level (i.e. tourist site, GTA regional or MoTAC) will file the completed form (as shown in **Annex 7**) appropriately as part of data keeping /documentation and for future reference to confirm resolution of grievance. It is also advised that photocopies of these documented resolved cases be collated on a quarterly basis into a database held at the MoTAC.

Financing

The entire GRM process will be financed by the Ministry of Tourism, Arts and Culture in consultation with the other participating agencies.

Recommended grievance redress time frame

The table below presents recommended timeframes for addressing grievance or disputes related to resettlement and compensation. It is envisaged that resettlement/ compensation disputes could be resolved at the community or regional levels.

Table 6: Suggested GRM time frame

Step	Process	Time frame
1	Receive and register grievance	within 5 Days
2	Acknowledge	within 24 hours
3	Assess grievance	Within 14 Days
4	Assign responsibility	Within 14 Days
5	Development of response	within 14 Days
6	Implementation of response if agreement is reached	within 1 Month
7	Close grievance	within 7 Days
8	Initiate grievance review process if no agreement is reached at the first instance	within 1 Month
9	Implement review recommendation and close grievance	within 2 Months
10	Grievance taken to court by complainant	-

6.6 Listing of Some Performance Indicators

Monitoring plans will be developed to track safeguard progress at both the ESMF and sub-project activity level (at the respective tourist sites). The proposed plans are presented in the **Table 8**. The table confirms the verifiable indicators as well as responsibilities for the various monitoring actions.

The monitoring issues at the ESMF level include confirmation of the dissemination of both ESMF and RPF documents as well as capacity building and training activities. At the sub- project 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 7: ESMF and RPF monitoring indicators and responsibilities

No	Monitoring level	Monitoring Issue	Verifiable indicators	Responsibility
1.	ESMF level	Adequate dissemination of ESMF and RPF to stakeholders	Record of consultations and meetings	PCU, GTA Consultants
			Workshop reports	
		Capacity building and training programs	Training reports	PCU, GTA Consultants
2.	Sub- project activity level	Screening of sub project	Checklist completed	Regional GTA
		Completion of EA1 form	Completed EA1 Form submitted to the EPA	Regional GTA

		Adequate mitigation measures provided to manage adverse impacts	ESMPs prepared	Regional GTA, Tourist site managers, EPA
		Project satisfies statutory provisions EPA Act 1994 (Act 490) LI 1652	EPA Permit for project	PCU, GTA regional, EPA
		Post project monitoring and evaluation	Monitoring reports, annual environmental reports	PCU, GTA, EPA

6.7 Comprehensive Institutional Arrangement

Project implementation will be mainstreamed within the existing government institutional structures. Capacity of implementation units will be augmented through hiring of consultant's subject to capacity assessment.

An overall Project Coordinating Unit (PCU) would be hosted within the Ministry of Tourism, Arts and Culture. It will be responsible for overall management of implementation, monitoring and evaluation, reporting, fiduciary, safeguards, and grievance redress. The PCU may have the following staff: A Project Coordinator, and officers responsible for Finance, Procurement, Social Safeguards, Environmental Safeguards, Public Relations/Communication, Monitoring and Evaluation, and Social Accountability. Other supporting staff, as needed, may also be appointed.

The projects will be implemented by the agencies under the Ministry comprising the Ghana Tourism Authority and the Museums and Monuments Board. Other collaborating institutions will include the Wildlife Division of the Forestry Commission and NGOs like the Ghana Heritage Conservation Trust (GHCT) and local communities.

The implementing agency will be facilitated by and mainstreamed into the existing planning coordination units at the regional level. Dedicated regional implementation teams within the regional GTAs in the Central and Western Regions will be formed from among the membership of the planning coordination. These will work closely with the PCU and report to same through their head office in Accra. At a minimum, the regional team will comprise a Project Lead and dedicated officers responsible for Finance, Procurement, Safeguards, and M&E.

Dedicated local implementation teams will be formed at each project tourist site to be directly responsible for project activities on the ground including regular interactions with local communities.

The organogram below depicts the proposed institutional arrangements from the MDAs to the Project Sites (PS). It includes possible relationships with the private sector (PSE) and NGOs/ CSOs.

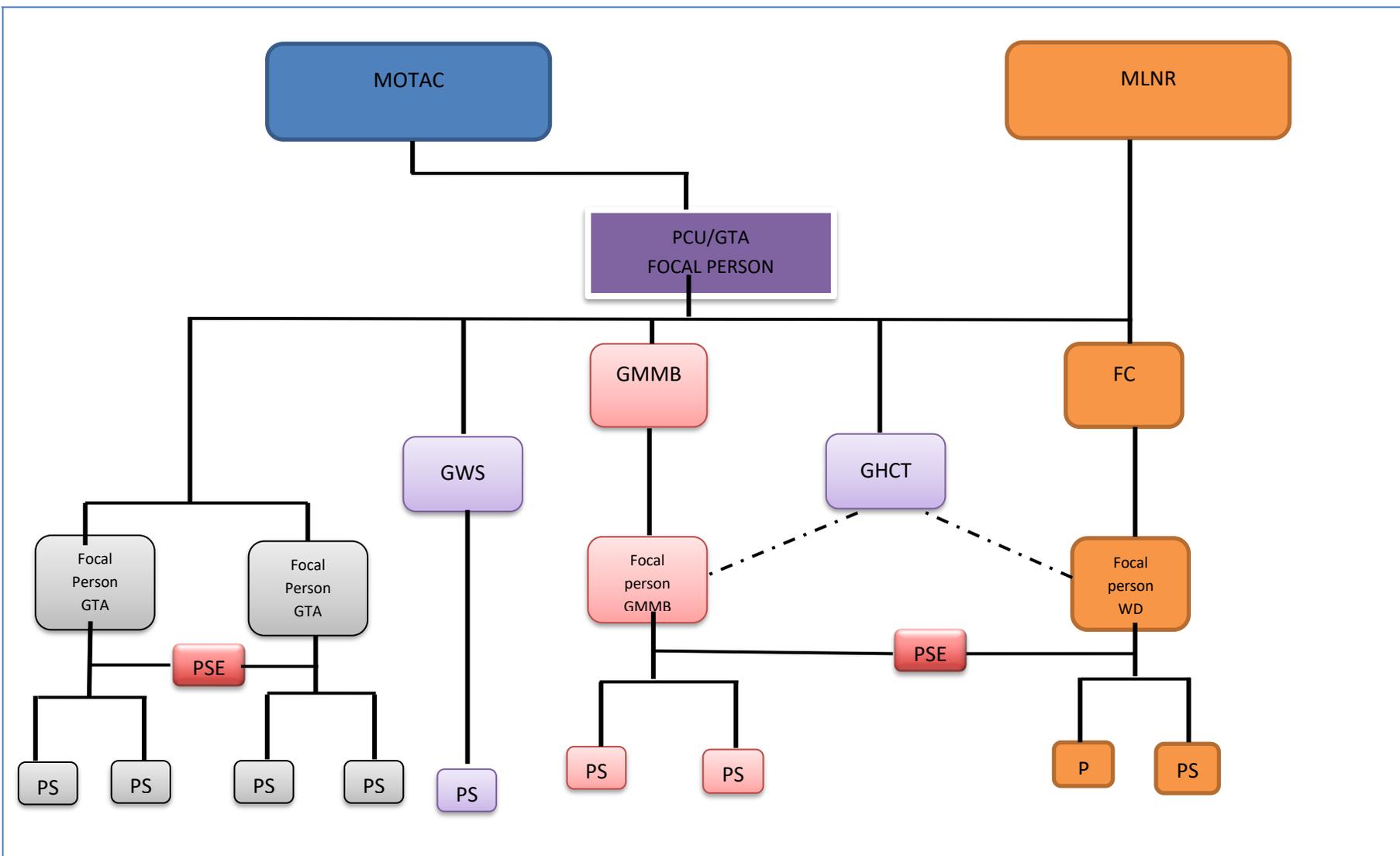


Figure 1: Organogram illustrating institutional arrangement

The project will be implemented by the Ministry of Tourism, Arts and Culture (MoTAC) and the Ghana Tourism Authority, including its regional offices in Ghana. As described earlier, a Project Coordinating Unit (PCU) will be set up at MoTAC to oversee the entire project and project implementation teams will work from the respective regions. The regional GTA team will work closely with the site project teams and may designate a safeguard focal person at that level.

It is anticipated that the PCU/ MoTAC will oversee all environmental and social due diligence for the Tourism Sector Development projects across the two (2) project regions.

The main institutions with interest in environmental and social management include:

- Ministry of Environment, Science, Technology and Innovation/ Environmental Protection Agency (EPA)
- Metropolitan, Municipal and District Assemblies (MMDAs)

The MMDAs will have limited capacity to implement environmental action plans and their mandates have already been described in earlier sections of this report. It is proposed that the designated safeguard persons at MoTAC and the regional GTA offices will receive adequate training to be able to sufficiently superintend over the implementation of the environmental and social actions.

The respective roles and responsibilities of the assigned safeguard persons are summarized below:

PCU/ MoTAC Safeguards specialist

The PCU safeguard specialist will be responsible for:

- Coordination of environmental and social safeguards across all projects
- Provide leadership in safeguard implementation across the GTA head office and regional offices and entire project sites
- Providing guidance and project level information and tools on safeguards for all stakeholders
- Assist to manage the environmental and social safeguard experts (consultants)
- Responsible for coordinating all safeguard activities with the WB and implementing agencies
- Oversee all environmental and social safeguard training and capacity building activities
- Any other activities/ responsibilities that may emerge

Safeguard consultants

The Consultants who will be conversant with the WB safeguard policies and their instruments and application will be hired periodically as and when required to support the implementation of the environmental and social safeguards including the preparation of manuals and checklists. The consultants will be conversant with the World Bank safeguards policies, the instruments and their application. Particular attention will be on the safeguards policies triggered by the project. The consultants' level of understanding should be adequate to facilitate training and other capacity related activities on safeguards.

Regional GTA safeguards focal persons

The Regional GTA Safeguard Focal Points will

- Supervise the site- specific project activities to ensure that all environmental and social safeguards issues are incorporated into Bid and specifications documents for all sub project types.
- Ensure that safeguards issues are included as part of the training at the project level and contractors invited to participate.
- Draft safeguards reports based on collated documents and reports from project activities as part of usual reporting on the project.
- Be the first point of contact for the project in case of any challenging issues on project-related safeguards - land, environmental, safety and health and draw the PCU safeguard specialists' attention in case of lack of resolution
- Collaborate with relevant authorities including the MMDAs and the community (chiefs and elders) and other community members and facilitate the implementation of subprojects and implementation of any other safeguards related activity.
- Perform any other related activities that may be assigned by the PCU safeguard specialists' to whom s/he will report.

The Ministry of Tourism, Arts and Culture (MoTAC) will serve as the lead government agency for this project. A project coordination unit (secretariat) will manage the project and ensure linkages and coordination with all interventions with the Ghana Tourism Authority.

The main responsibility for implementing the ESMF and the RPF rests with the Safeguards specialists to be appointed in the PIU and will be supported by, as needed, environmental and social experts who will be recruited by the project. The project implementation teams to be formed at the regional GTA offices will also have their respective safeguards focal persons who will oversee the implementation of all actions to mitigate adverse environmental and social impacts within the respective project tourist sites in the two regions. They will in turn, supervise designated safeguard persons at the tourist sites to ensure sound management practices at the community level.

6.8 Itemized estimates of the Budget

The awareness creation, capacity improvement and training workshops as well as some logistic support expenses for key stakeholders involved in the implementation of proposed interventions is estimated at **US\$690,000** over the 4- year project life as explained in the **Table 7** below:

Table 8: Estimated budget to implement ESMF

No	Activity	Description	Annual cost, US\$	Total Cost, US\$
1.	Staffing	1. PCU safeguard specialist	48,000 per Yr	192,000
		2. Environmental and Social Safeguard Expert	20,000 per Yr	80,000
2.	<u>Training</u>			
	2a. Awareness creation and Capacity building for PCU and GTA	Training workshop/ seminars on Module 1	10,000 x 2 during Yr 1	20,000
	2b. Capacity building for PCU and GTA	Training workshop/ seminars on Module 1, 2 and 3	20,000 per Yr	80,000
	2c. Awareness creation and capacity building for Contractors, Supervising engineers, Tourist site managers (WD, GMMB) CSOs (GHCT, GWS) Community persons	Module 4 and Community meetings and training	20,000 per Region per Yr	160,000
3.	Guidance and tools	Guidance Documents, Checklists, Forms, TORs, Technical Planning Tips	2,500	10,000
4.	Communications	Radio, TV discussions, Newspaper adverts on issues relating to ESMF/ RPF	5,000	20,000
5.	Transport, per diem, registration fees (participation in training)	Specific meeting and workshop registration fees (local and international)	20,000	80,000
6.	Monitoring and Evaluation	Safeguards component for M&E	12,000	48,000
	TOTAL			690,000

7 PUBLIC CONSULTATION DURING THE PREPARATION OF ESMF

The ESMF preparation included stakeholder consultations. Key project stakeholders were identified for consultations and these included State Agencies and Departments, Project offices, Non-governmental organization, Tourist sites, and local communities in the Central and Western Regions.

Meetings were held with key officials and opinion leaders to gauge level of awareness and involvement with the project, concerns of project implementation, and to obtain relevant documents or baseline information. The consultations also served to gather information on the mandates and permitting requirements to inform the development of the Projects. The list of stakeholders contacted and issues discussed are summarized in **Annex 6**.

ANNEXES

- Annex 1: SCREENING CHECKLIST FOR ENVIRONMENTAL AND SOCIAL SAFEGUARDS ISSUES
- Annex 2: UNDERTAKING REQUIRING REGISTRATION AND ENVIRONMENTAL PERMIT (EPA LI 1652 (1999))
- Annex 3: SAMPLE COPY OF EPA REGISTRATION FORM, EA1
- Annex 4: FLOWCHART OF THE EIA PROCESS
- Annex 5: ENVIRONMENTALLY SENSITIVE/ CRITICAL AREAS
- Annex 6: STAKEHOLDER CONSULTATIONS (List of Persons Consulted and summary of discussions and concerns)
- Annex 7: GRIEVANCE REDRESS REGISTRATION AND RESOLUTION FORM
Compensation Claim and Commitment Form /Model Complaint Resolution Form/ GRM general log
- Annex 8: Physical cultural resource management plan

ANNEX 1: SCREENING CHECKLIST FOR ENVIRONMENTAL AND SOCIAL SAFEGUARDS ISSUES

1. Project Information: Name and Contact Details:			
Project Name	Location: (region/district/village)		
	If other, explain:		
Name of lead screener:		Date of screening:	
Name of lead reviewer:		Date of reviewing:	

Subproject Details: Attach location map (longitude – latitude coordinates (GPS reading) if available):	
Type of activity: <i>What will be done, who will do it, what are the objectives and outcomes</i>	
Estimated Cost:	
Proposed Date of Commencement of Work:	
Expected Completion of Work	
Technical Drawing/Specifications Reviewed:	Yes/No – refer to Application Portfolio

2. Physical Data:	Comments
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. Preliminary Environmental Information:	Yes/No	Refer to RPF	Specify/ Provide Comments
Is there adjacent/nearby critical natural habitat?			
Is there activities On Forest Reserve?			
Is there activity adjacent to Forest Reserve?			
What is the land/ water currently being used for? (e.g. tourist site, fishing, etc.)			List the key resources.

Will the proposed activities have any impact on any ecosystem services, biodiversity issues or natural habitats?			
Will there be restrictions or loss of access to using natural resources in any traditional areas including medicinal plants or those of economic value for livelihoods?		✓	
Will there be water resource impacts?			
Will there be soil impacts?			
Will the subproject require use of special chemicals?			
Are there any new or changing forest management planning or activities?		✓	
Any cultural heritage/sacred sites in project area?		✓	

4. Preliminary Social and Land Information:	Yes/No	Refer to RPF	Specify/ Provide Comments
Has there been litigation or complaints of any environmental nature directed against the proponent or subproject?		✓	
Will the subproject require the acquisition of land?			
What is the status of the land holding (customary, lease, community lands, etc.)?		✓	
Is there evidence of land tenure status of farmers and/or occupants (affidavit, other documentation)?		✓	
Are there outstanding land disputes?		✓	
Has there been proper consultation with stakeholders?		✓	
Is there a grievance process identified for PAPs and is this easily accessible to these groups/individuals?		✓	
Will there be any changes to livelihoods?		✓	
What are the main issues associated with community benefits?		✓	
Will any restoration or compensation be required with "communities"?		✓	

5. Impact identification and classification:

When considering the location of a subproject, 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 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.

Issues	Site Sensitivity			Rating (L,M,H)
	Low	Medium	High	
Natural habitats	No natural habitats present of any kind	No critical natural habitats; other natural habitats occur	Critical natural habitats present; within declared protected areas	If High Refer to Annex 3.1 and Contact Regional EPA
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	If High Refer to Annex 3.1 and Contact Regional EPA
Natural hazards vulnerability, floods, soil stability/ erosion	Flat terrain; no potential stability/ erosion problems; no known flood risks	Medium slopes; some erosion potential; medium risks from floods	Mountainous terrain; steep slopes; unstable soils; high erosion potential; flood risks	If High Refer to Annex 3.1 and Contact Regional EPA
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	If Medium or High Refer to Process Framework
Involuntary resettlement	Low population density; dispersed population; legal tenure is well-defined; 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	If Medium or High Refer to Resettlement Process Framework

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

6. E & S assessment comments based on site visit (use additional sheet and attach if necessary):

Summary Observations

Potential Environmental and Social Issues That Require Referral to EPA or Using EA1 Form

	Benchmark and Issues	Impact description	Yes	No	Remark
1.	Statutory provisions	Is the proposed tourist site affected by any of the sensitive or critical areas provided by the EPA for which EIA is mandatory?			If yes, proceed with EA1 Form
2.	Statutory provisions (see <i>Natural Habitat Issues in Checklist</i>)	Are there any ecologically sensitive/ critical areas within the proposed project area			If yes, contact regional EPA
3.	Protected areas and wildlife	Will project activities potentially impact natural habitats or critical wildlife species			If yes, proceed with EA1 form
4.	Biodiversity loss	Will land use change or vegetation clearance lead to loss of exceptional flora/ fauna			If yes, proceed with EA1 form
5.	Water pollution	1. Is there a local stream close to the project site? 2. Does it flow all year round? 3. How long does it take to walk to this stream 4. Do you think any project activity will affect this stream			If 4 is yes, proceed with EA1 form
6.	Soil erosion	Are there steep slopes in the project area? Can you easily walk on the slopes without falling			If yes, proceed with EA1 form

7. Impact Identification and Mitigation (use additional sheet and attach if necessary)	
Impact/Risk	ESMF Mitigation Options & Others

8 Categorization and Recommendations*

Determination of the environmental category is based on the final evaluation findings under section 5,6 & 7 of the screening checklist.

Tick as appropriate	Category	Rating	Recommendation
	1	High	Requires registration with the EPA and additional environmental or social instruments (ESMP, ESIA, ARAP, RAP, etc.) to support the ESMF/RPF
	2	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 will prepared a site-specific ESMP or ARAP.
	3	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:

ANNEX 2: UNDERTAKING REQUIRING REGISTRATION AND ENVIRONMENTAL PERMIT

(EPA LI 1652 (1999))

SECTOR	Sub sector	Description
AGRICULTURE	Community Pastures	Involving the clearing of land greater than 40 ha Involving the clearing of land located in an environmentally sensitive area
	Fruit and other vegetable farms	Management areas: Involving the clearing of land greater than 40 ha Involving the clearing of land located in an environmentally sensitive area
FISHING AND TRAPPING	Fishing	a. fish or shell fish farming in salt water, brackish water or fresh water, where the proposal includes the construction of shore-based facilities other than wharves; b. permanent traps or weir fisheries, salt water.
	Services incidental to fishing	Fish or shellfish breeding and propagating services, or fish or shellfish hatchery services, where the proposal includes the construction of shore based facilities other than wharves.
LOGGING AND FORESTRY	Logging	Management of forested land for the primary purpose of harvesting timber in a contract area.
	Forestry services	a. application of pesticides; b. introduction of exotic species of animals, plants or microbial agents.
MINING	Metal mines Non metal mines	-
CRUDE OIL AND NATURAL GAS	Crude oil or petroleum production facilities Natural gas production facilities	
QUARRIES AND SAND PITS	Stone quarries	Where the total area is greater than 10ha, OR Where any portion is to be located within an environmentally portioned area
	Sand and gravel pit	a. where the total area is greater than 10 hectares, or b. where any portion is to be located within an environmentally sensitive area.
FOOD	Meat and poultry products	a. abattoirs; b. meat, fat or oil processing facilities c. poultry processing facilities.
	Fish products	-

	Flours, prepared cereal foods and feeds Feed mills	-
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SECTOR	Sub sector	Description
BEVERAGES	Distillery products Brewery products Wines	-
RUBBER PRODUCTS	a. tyres and tubes; b. rubber hoses and beltings; c. other rubber products	-
PLASTIC PRODUCTS	a. tyres and tubes; b. rubber hoses and beltings; c. other rubber products	-
LEATHER AND ALLIED PRODUCTS	Man made fibres and filament yarns Spun yarns and woven cloths Broad knitted fabrics	-
TEXTILE PRODUCTS	Natural fibres processing and felt products Carpets, mats and rugs Canvas and related products Other textile products	-
WOOD	Sawmill, planing mill and shingle mill products industries Veneers and plywoods Other wood products Wood preservation facilities which use hazardous chemicals or similar chemical processes Particle board or wafer board production	-
PAPER AND ALLIED PRODUCTS	Pulp and paper Asphalt roofing Other converted paper products	-
PRIMARY METALS		-
FABRICATED METAL PRODUCTS		-
TRANSPORTATION EQUIPMENT		-
REFINED PETROLEUM PRODUCTS	Agricultural chemicals Plastics and synthetic resins Paints and varnishes Soaps and cleaning compounds Other chemical products	-
OTHER	Scientific and professional	Photographic films and plates manufacturing

SECTOR	Sub sector	Description
MANUFACTURING	equipment	Floor tiles, linoleum and coated fabrics manufacturing Other manufacturing products
CONSTRUCTION	Industrial construction (other than buildings)	a) Construction of pipelines for the transmission of oil, natural gas and other related products from the source to the point of distribution, where: Any portion of the pipeline is to be located at a distance greater than 500m from an existing right of way; or Any portion of the pipeline is to be located in an environmentally sensitive area b) diesel electric power generating plants having capacity greater than 1 megawatt a gas turbine electric power generating plants having capacity greater than 1 megawatt c) nuclear electric power generating plants
HIGHWAYS AND HEAVY CONSTRUCTION	Roads	-
	Waterworks and sewage system	Construction of trunk pipelines for transmission of water from the source to the point of distribution Construction of trunk sewer pipelines Construction of trunk sewer pipeline outfalls
	Hydroelectric power plants and related structures	Construction of dams and associated reservoirs Inter or intra basin water transfers Construction of hydroelectric power developments
UTILITIES		Establishment of waste disposal sites Establishment of facilities for the collection or disposal of hazardous waste materials
WHOLESALE TRADE	Petroleum products	Wholesale establishment of petroleum products storage facilities
	Waste materials, wholesale	Establishment of facilities for the purpose of assembling, breaking up, sorting or wholesale trading of scrap, junk or waste material of any type
SERVICES	Economic services administration	Resource conservation and management programmes involving introduction of exotic species of animals or plants for any purpose; Resource conservation and management programmes involving introduction of native species of animals or plants into areas where those species do not occur at the time of the proposed introduction Designation of land for cottage development or other recreational development

ACCOMMODATION	Establishment of recreation	-
SECTOR	Sub sector	Description
SERVICES	and vacation camps	
AMUSEMENT AND RECREATIONAL SERVICES	Commercial spectator sport	Establishment of horse racetrack operations Establishment of racetrack operations for motorized vehicle sports and recreation clubs and services Establishment of facilities, including trails Establishment of outdoor firearm ranges Establishment of marina operations Establishment of facilities, including trails for mortised recreational vehicles Other amusement and recreational services

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)

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

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:

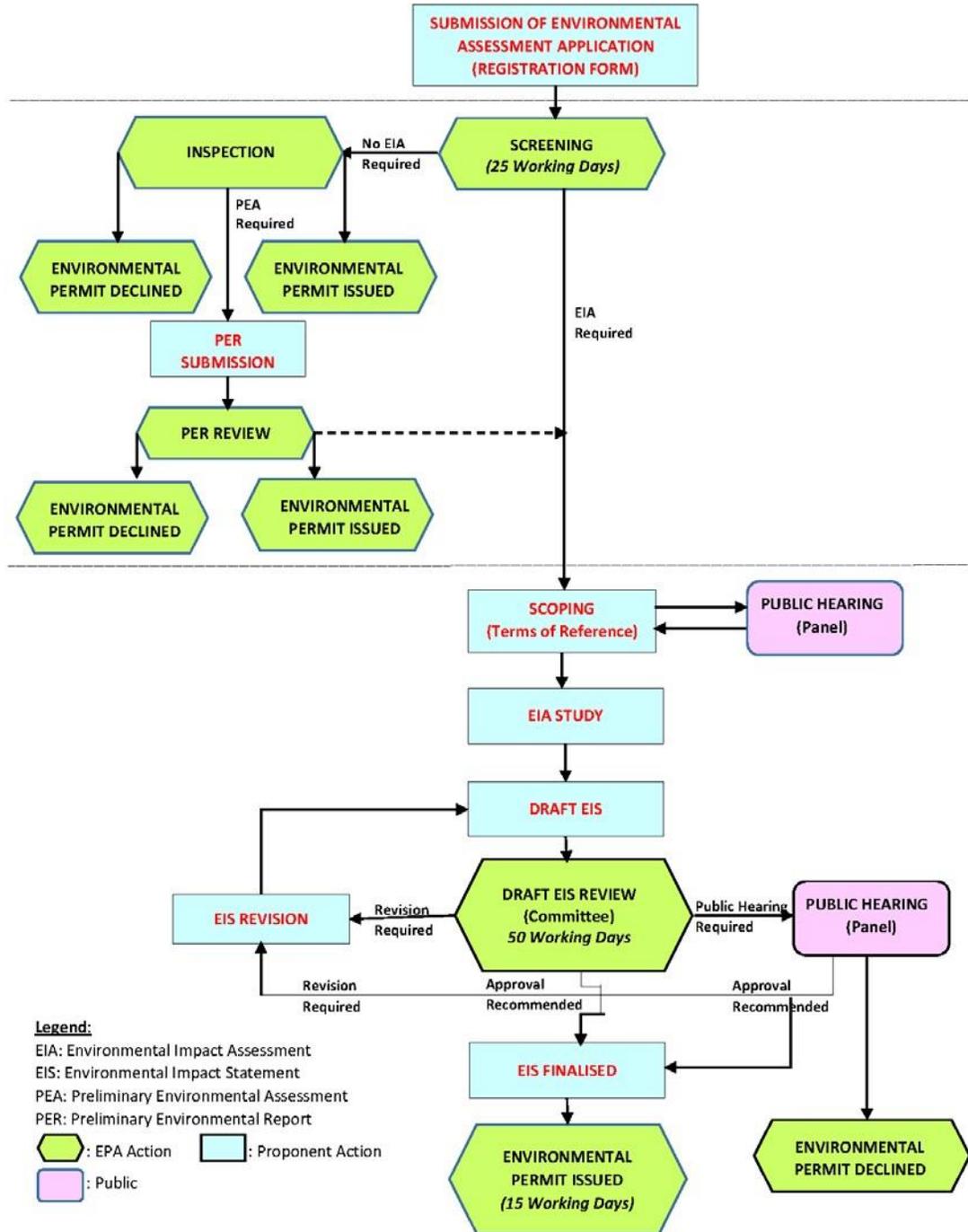
I,, hereby declare that the information provided on this form is true to the best of my knowledge and shall provide any additional information that shall come to my notice in the course of processing this application. I also declare that information provided is true.

Signature

Date

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

ANNEX 4: FLOWCHART OF THE EIA PROCESS



ANNEX 5 ENVIRONMENTALLY SENSITIVE/ CRITICAL AREAS

NB: Projects sited in these areas could have significant effects on the environment and the EPA could require a more stringent environmental assessment

All areas declared by law as national parks, watershed reserves, forest reserves, wildlife reserves and sanctuaries including sacred groves

Areas with potential tourist value

Areas which constitute the habitat of any endangered or threatened species of indigenous wildlife (flora and fauna)

Areas of unique historic, religious, cultural, archeological, scientific or educational interest

Areas which provide space, food, and materials for people practicing a traditional style of life

Areas prone to disaster (geological hazards, floods, rainstorms, earthquakes, landslides, volcanic activity etc)

Areas prone to bushfires

Areas classified as prime agricultural areas

Recharge areas of aquifers

Water bodies characterized by one or any combination of the following conditions:

Tapped for domestic purposes

Within controlled/ protected areas

Which support wildlife and fishery activities

Mangrove areas characterized by one or any combination of the following conditions:

With primary pristine and dense growth

Adjoining mouth of major river system

Near or adjacent to traditional fishing grounds

Which acts as natural buffers against shore erosion, strong winds and storm floods

Estuaries and lagoons

Other coastal areas of ecological, fisheries or tourism importance or which are subject to dynamic change
Wetlands

Rivers

Areas of high population density

ANNEX 6: STAKEHOLDER CONSULTATIONS

List and contacts of stakeholders consulted

No	Name	Organisation/ Community	Position	Contact
Western Region				
1	Mr. Aya Baidoo	Ghana Tourism Authority, Western Region	Ag. Regional Manager	054- 3533906
2	Mr. Kwesi Frimpong	Ghana Tourism Authority, Western Region	Ag. Deputy Regional Manager	054-4259347
3	Mr. Gilbert Nuuri- Teg	Nzema East Municipal Assembly	Municipal Coordinating Director	024- 4830012 020- 9729763
4	Hon. Frank Okpenyen	Nzema East Municipal Assembly	Municipal Chief Executive	
5	Mr. Joseph Abrokwah	Drinking Pub Operator, Axim	Owner and Manager	020- 4075071
6	Mr. Ernest Kwame Grant	Paa Grant Heritage Home	Resident and Descendant	024- 3313389
7	Mrs. Anita Quansah	St. Augustinus School	Proprietress	024- 6333677 050- 6772951
8	Emmanuel Emuah	Ghana Wildlife Society	Asst Tourism Officer	024- 3036351
9	Mr. Emmanuel Arthur	Nzulezu Community	Chief's Representative	
10	Mr. Kelvin Adiaba	Nzulezu Community	Motorised Boat Operator	
11	Mr. Stephen Anyimah	Fort Apollonia	Tour Guide	024- 8962159
12	Mr. Cletus Balangtaa	Forestry Commission, Wildlife Division	Park Manager, Ankasa Reserve	027- 5543135 024- 4650166
13	Mr. Papa Kwaw Ansah	Forestry Commission, Wildlife Division	Tourism Officer, Ankasa Reserve	020- 5957949
14	Mr. Appiah Boakye	Forestry Commission, Wildlife Division	Tour Guide, Ankasa Reserve	050- 9800611
15	Mr. Stephen Atta	Forestry Commission, Wildlife Division	Tour Guide, Ankasa Reserve	020- 0161801
Central Region				
16	Ms. Diana Adu Ansah	Ghana Tourism Authority, Central Region	Regional Manager	020- 8484938
17	Mr. Laweh	Ghana Tourism Authority, Central Region	Programmes Officer	024-4990668
18	Mr. Enoch Ashie	Forestry Commission, Wildlife Division	Park Manager, Central Region	024-3413742 020-6028060
19	Mr. Kwesi Wilson	Twifo Heman District Assembly	District Coordinating Director	054- 0981569
20	Mr. Nicholas Ivor	Ghana Museum and Monuments Board	Regional Manager, Western and Central	020- 8117316
21	Mr. Martin Alfa	Ghana Heritage Conservation	Executive Director	024-4604504

No	Name	Organisation/ Community	Position	Contact
		Trust		
22	Mr. Jonathan Yaba	Ghana Heritage Conservation Trust	Programme Officer	050- 1291685
23	Mr. Kwesi Daniels	Ghana Heritage Conservation Trust	Administrator	050- 1291690 024- 4243893
24	Mr. Kobina Benya	Fishing Community	Linguist	024-0414677
25	Mr. Kofi Ackon	Fishing Community	2 nd Linguist	055- 5873208
26	Mr. Kobina Nyamekye	Fishing Community	Secretary	024-0713660

No	Organisation/ Community/ Comments, Concerns and Suggestions
[A] Western Region	
1	<p>Ghana Tourism Authority, Western Region Persons Consulted Mad. Aya Baidoo, Ag. Regional Manager and Mr. Kwesi Frimpong, Ag. Deputy Regional Manager</p>
	<ul style="list-style-type: none"> • Three iconic sites had been identified by the Ministry for consideration. The sites are (1) Ankasa Forest Reserve, (2) Nzulezu Village and (3) Heritage Home Redevelopment • Tourism industry has generally been hit hard by the national economic constraints as the anticipated oil and gas boom did not fully materialise. • The office regulates and Licenses the activities of the industry players such as Hoteliers, car rentals, restaurants and chop bar operators within the entire region • License for operators are renewed yearly at a fee • Some tourist sites fall under different establishments and therefore revenue from those sites go through the specific ministry, eg MLNR • Key concerns include poor sanitation and security. Some locals loiter around tourist sites and harass tourists (especially international tourists) asking for arms or sometimes pickpocketing. • Health and safety issues must be thoroughly addressed to improve the industry under the proposed project • For the success of the redevelopment and redesign of the sites, community involvement is very key • Communities within which tourist sites are located should benefit directly in secondary projects eg. toilets, water supply
	
2	<p>Nzema East Municipal Assembly Persons Consulted Mr. Hon. Frank Okpenyen, Municipal Chief Executive and Mr. Gilbert Nuuri- Teg, Municipal Coordinating Director</p>
	<ul style="list-style-type: none"> • The revitalizing the tourism sector is welcomed by the Assembly and expect to earn some income from a more vibrant industry. Currently, revenue from the sector to the Assembly is insignificant • The Assembly confirmed the tomb and heritage home of the Late Paa Grant is located in Axim, a community within their jurisdiction.

No	Organisation/ Community/ Comments, Concerns and Suggestions
	<ul style="list-style-type: none"> • Tombs of other nationals especially some British nationals are located at the Paa Grant grave site • Fort St. Antonio, Mysterious rocks at Ahunyame and the Lighthouse are other tourist sites within the assembly the ministry should consider for marketing • Some renovation works had been carried out at the grave site of Paa Grant by the Ministry of Tourism after which the President visited to commission it recently • There is an operating drinking spot “Paa Grant Gardens” near the tomb site which may have to be relocated in the event of any expansion works. The owner named the spot after Paa Grant to boost his business • Some restaurants and snack bars could be operated by indigenes to meet the demand of tourists who may be travelling to these place after the redevelopments and renovation of some of the sites. • There are existing serene hotels such as the Ankobra Beach, Axim Beach, Lou-moon whose revenues could be boosted as a result of the proposed project with subsequent indirect benefits to the Assembly
	
3	<p>Paa Grant Gardens</p> <p>Person Consulted Mr. Joseph Abrokwah, Drinking Pub Owner and Operator, Axim</p>
	<ul style="list-style-type: none"> • The facility is virtually on the old cemetery even though some graves have been abandoned. The pub owner was granted a long lease term of 50 years from the family which now owns the land. Subsequently annual ground rent is also paid. • He welcomed the plan of government to redevelop the place into a tourist site. • Prior to the recent renovations by the ministry, he has been weeding and keeping the place tidy to also enhance his business • He is not expecting to relocate due to the proposed project. There is adequate space in the cemetery for any new developments • He confirmed that tourist visits to the grave site would impact positively on his business • The abandoned house of Paa Grant should be renovated into a tourist site. The ground floor of the house used to be a bank.

No	Organisation/ Community/ Comments, Concerns and Suggestions
	 
4	<p>St. Augustinus School</p> <p>Person Consulted -Mrs. Anita Quansah, Proprietress</p>
	<ul style="list-style-type: none"> • The school was established in 1986. • The School was in the process of acquiring a section of land within the compound of the Paa Grant Heritage Home but the payment was halted when the family member dealing with the school failed to release the land title documents. • The school currently houses six (6) classroom block • The owner is willing to relocate if required but expect that she would be given assistance to do so. The school has already acquired a new site to move to, if need be.

No	Organisation/ Community/ Comments, Concerns and Suggestions
	
5	<p>Ghana Wildlife Society/ Local community</p> <p>Person Consulted Mr. Emmanuel Emuah, Assistant Tourism Officer</p>
	<ul style="list-style-type: none"> • These are the organizers of the tourist trips to the Nzulezu community • There are 19 staff all are indigenes from local communities such as Benyin, Nzulezu, Ngelekazo, Lekebaku • The team of staff comprises a manager, a tour guide leader, an assistant tour leader, tour guides and a secretary. • The secretary is responsible issuing tickets for guests for site seeing at Nzulezu • Revenue collected are shared among 6 communities after deduction of all operational costs including salaries of staff. • Payments are made directly into the communities respective bank accounts every half year • Revenues paid to the communities are meant for development works in the communities • Training is organised for tour guides every year by wildlife society • The canal leading to the boats must be desilted in order for the boats to come close to the platform • Solid waste management is a challenge in Nzulezu community. Waste is seen trapped in the waterbody • In peak periods about 200 tourist are received in a day for visit to Nzulezu. Highest numbers are recorded especially on weekends and holidays. • The Wildlife Society owns 12 canoes • Some private persons also own canoes and speedboats. • There is a need for a Chps compound and an avenue for first aid for tourist in the event of any accident • The ticket fees per person are GH¢10 for primary students GH¢12 for JHS, GH¢15 for tertiary and GH¢20 for Adults. Visitors are given life jackets upon paying. • The tourism business is good but they lack associated facilities like restaurants, guest houses and others to complement the visit to the Nzulezu community. Hence, the full benefit is not achieved • The Wildlife Society after some years, has handed over the facility to the community hence it is currently a full community managed tourist facility. • Currently, they are struggling to survive.

No	Organisation/ Community/ Comments, Concerns and Suggestions
	
6	<p>Nzulezu Community Person Consulted Mr. Emmanuel Arthur, Chief's representative</p>
	<ul style="list-style-type: none"> • The population of Nzulezu is about 500 people • Solid waste is a challenge for the community. Waste bins have been provided but their disposal is still a challenge. Plans are underway to construct a concrete platform to enable incineration of waste • There is no clinic or health post in the community and hence medical attention is sought from Benyin and other nearby communities. • Their portion of proceeds received from the management is 12% of total income. This percentage is low and should be raised. • There is a traditional birth attendant in the community for deliveries • There is a school for nursery to class 6 pupils. Junior High School education is continued at Benyin and other communities. • Through the proposed project, restaurants and guesthouses should be set up since some tourists request to sleep over and experience the ambience. • Tourists who visit the community make donations which are used for community developments • The first and only fire outbreak was recorded in 1968 and measures are in place to ensure it does not happen again. There are always community members around to raise alarm in case of any such danger • There was flooding in 2006 but not disastrous • Construction of the wooden houses requires local expertise and community is always ready to assist. • Rituals are carried out yearly to the Amanzule god (Snail) who is believed to have led the community to their present location from Mali. • Their cemetery is about 20min of paddling away. • They are now used to the regular inflow of tourists and do not see it as too intrusive on their private lives • Looking forward to enhanced community earnings to improve upon their lives including the community clinic

No	Organisation/ Community/ Comments, Concerns and Suggestions
	
7	<p>Fort Apollonia, GMMB Person Consulted Mr. Stephen Anyimah, tour guide</p>
	<ul style="list-style-type: none"> • The site is open to tourist every day. • The facility is under the Ghana Museum and Monuments Board (GMMB). • Revenues collected are sent directly to the GMMB • Attendance is higher during holidays and weekends • On good business days, revenue of GH¢1,000 is recorded in a day
	
8	<p>Wildlife Division, Forestry Commission</p> <p>Persons Consulted Mr. Cletus Balangtaa, Park , Manager, Papa Kwaw Ansah, Tourism Officer Mr. Appiah Boakye, Tour Guide, Mr. Stephen Atta, Tour Guide</p>

No	Organisation/ Community/ Comments, Concerns and Suggestions
	
	<ul style="list-style-type: none"> • The Protected Area Development Programme (PADP) Phase I and II developed a management plan for tourism within the reserves. • There was a programme mounted to use the reserve as training ground for communities and other institutions nearby on the biodiversity of the area. The programme is no more running. □ A project to construct chalets for tourists was stalled • There is the need for accommodation and restaurant strategically located within the reserve for tourist who wish to stay overnight • The access roads to the reserve are poor and must be re- constructed • An exploratory base constructed within the enclave collapsed and there is the need for reconstruction • There are many local waterbodies to support water sporting activities • A site has been demarcated for quiet time and meditation within the enclave • Revenue disbursement must be reconsidered. There must be a good balance between Forestry Commission and Tourism Authority in terms of revenue sharing • Community Resource Management Areas (CREMA) concept has been accepted and used for safeguarding the facility. Beneficiary communities are supported and trained in livelihood activities such as bee keeping, plant nursing etc. to minimize encroachment • The proposed project will create job opportunities for inhabitants of nearby communities • Currently the office lacks various equipment including basic ones such as GPS for location mapping, • Protective apparel and weapons for tour guides and for law enforcement are inadequate • Entrance fees received from tourists at the security point are returned to the office in Ankasa weekly and then at the end of the month, forwarded to the wildlife zonal office at Kakum • The office has transport constraints. Currently there is only one vehicle for the office □ There are no computers for staff • There is no internet connectivity • Tour guides sometimes work beyond working hours and during weekends but there are no forms of compensation to them • There must be a bridge constructed over one of the reserve’s major streams which is the Suhiri River • Bird watchers visit the reserve yearly from August

No	Organisation/ Community/ Comments, Concerns and Suggestions
	<ul style="list-style-type: none"> • Elephant accidents are minimal and no case has been recorded in a long while. • Galamsey and tree felling activities are also minimal in the reserve • Staff bungalows were provided under an EU Project • The project is very welcome and should assist to solve many of the management and operational challenges at the Reserve so that the full potential of the site is achieved.
Central Region	
9	Ghana Tourism Authority, Central Region Persons Consulted Mrs. Diana Adu Ansah, Regional Manager, Mr. Laweh, Programmes Officer
	<ul style="list-style-type: none"> • The project is a laudable one • The Brenu Achenu Beach manned by a private investor could be considered as one of the sites for tourism • Fosu lagoon could also be considered as a tourist site for water sports and other recreational activities • The Kakum reserve seems to be relatively well managed through the Ghana Heritage Conservation Trust, an independent body set up for the purpose • All castles and forts are under the Museums and Monuments Board but promotion/marketing of these facilities are done by Ghana Tourism Authority • The Elmina Lagoon listed for consideration may be a challenge as the community depend on the water for their livelihood • All stakeholder communities must be involved throughout the process for their support • Revenue sharing should strongly consider host communities • Some tourists are harassed especially around the castles by hawkers, beggars etc • Open defecation along the castle shores is a challenge in the Region • A site has been allocated within the castle for display and sale of artifact to enable community members earn some income • Community sensitization should be key for the project • Tourist information will include education on security • Seminars are organised by the office periodically for tourism enterprises • Indigenes to be considered for job opportunities
	

□

No	Organisation/ Community/ Comments, Concerns and Suggestions
10	Forestry Commission, Wildlife Division Person Consulted Mr. Enoch Ashie, Kakum Park Manager
	<ul style="list-style-type: none"> • Total land area for the Kakum conservation is 360km². Kakum Conservation covers 210 km² and 150km² for Assin Atandanso • There are about 50 communities around the conservation • The park is bordered by cocoa and oil palm • The Kakum River is a source of water supply to Cape Coast and environs • Two water bodies feed the Kakum River outside the reserve and flow into the Brimso River, the source of treated water supply to Cape Coast • The total staff strength is 66 with Law enforcement Unit taking about 40 staff □ All staff stay close to the reserve • Two stakeholders ie. Microsfere and Conservation Alliance will be introducing micro savings and livelihood support training to nearby communities • There is a collaborative efforts between the park and communities to settle human-wildlife conflicts especially resulting from destructive activities of elephants on farms and nearby settlements • Some ways of handling human- wildlife conflicts include tagging and tracking, pepper fencing, and bee hive fencing around farms • Feasibility studies for Community Resource Management Areas (CREMA) is ongoing • The tourism unit is responsible for facility management and maintenance • The new visitor centre developed in 1996 was with donor funds from USAID • The Kakum walkway is able to attract 120,000 visited in a year • The bad nature of the road deter tourist visits and may account for the recent drop in attendance • According to existing database, tourist from about 90 to 100 countries visit the park annually • Ghana Heritage Conservation Trust was set up as a secretariat to ensure the good condition and smooth running of the facility • Revenue accrued from the walkway is shared almost equally between Forestry Commission (FC) and Ghana Heritage Conservation Trust (GHCT) • There are 5 tour guides who are FC staff, but due to the large tourist numbers received sometimes, the community tour guide concept has been adopted where some community members have been trained to guide tourists. The guides are paid based on the number of tourist they handle within the day • Some activities for tourists include nature hiking on foot, bird watching, animal viewing • Construction of a camping site along the hiking trails could be considered • Bridges should be constructed over the river and streams flowing within the park to enhance movements • The Antwikwaa bird watching site was identified by birdlife International • GH¢2.50 facility user fee per person is collected at the entrance to the park • Exclusive income site for the FC is camping/ tree house and hiking inside the site while camping activities outside the reserve goes to Ghana Heritage Conservation Trust solely • There is a Community Advisory Committee to discuss community development issues. □ Funds for community developments is from GHCT. • Part of the revenue from GHCT goes to stool lands and communities • Compensation for the protected area acquired have not been fully paid. • GHCT has constructed a children’s park within the kakum park for child recreation

No	Organisation/ Community/ Comments, Concerns and Suggestions
	<ul style="list-style-type: none"> • There will be the need to identify products within the reserve to boost revenue • Public Private Partnership should be encouraged and promoted for the tourism development • All relevant policies should be developed for the efficient management of tourism facilities • In developing tourism within the reserves the mainstream activities for the reserves (protection of wildlife) should not be ignored as they could generate adverse impact on tourism • Staff bungalows should be constructed. Some staff leave in rented accommodation compromising enforcement activities especially • There will be the need to update data collected on the reserve to improve management
	
11	<p>Twifo Heman District Assembly</p> <p>Person Consulted Mr. Kwesi Wilson, District Coordinating Director</p>
	<ul style="list-style-type: none"> • Currently the assembly does not receive any benefits from the Reserve within its jurisdiction • Some royalties must be paid to support the assembly's Internally Generated Funds • There has been an initial dialogue between the assembly and the FC to develop some sites to attract tourists for revenue to the Assembly • Policies must be made to ensure hosting assemblies benefit from tourist sites • Partnership with the public sector will boost developments within the tourism sector • The Assembly will source for support for the development of a camping site for bird watchers at Antwikwaa Community as agreed with the Kakum management

No	Organisation/ Community/ Comments, Concerns and Suggestions
	
12	<p>Ghana Museum and Monuments Board (GMMB)</p> <p>Person Consulted Mr. Nicholas Ivor, Regional Manager, Western and Central</p>
	<ul style="list-style-type: none"> • The office is responsible for all forts and castles within the western and central regions • Under the monument division are painters, artistes, carpenters, architects etc. • The core business is to protect and preserve the facilities and interpret the stories behind the facilities to tourists • Income generated goes directly into the consolidated fund • Stakeholders of GMMB include tour operators, Ministry of tourism, Ghana Heritage Conservations Trust, local and foreign academic institutions, regional administration, traditional authorities, Diasporas etc. • As at December 2017 the staff strength for both Central and Western Regions was 82. □ There are about 17 monuments in the two regions • The involvement of the private sector in tourism redevelopment is important for sustainability purposes • GMMB is considering a partnership arrangement with the University of Cape Coast to use Fort Jago as a research Centre • Some partnership proposals have been received from persons in the private sector but no implementation has taken place yet • The facilities are managed following UNESCO regulations • There is lack of personnel and therefore the need to employ and train new persons □ There is one vehicle for operations within the regions • GMMB is represented on a tourism committee of the Cape Coast Municipal Assembly • The local communities support in keeping watch over these facilities • During the Oguaa festive season, the communities are provided with some sponsorship packages • The forecourt of the cape coast castle is made available for durbars and access given them into the castle for their annual sacrificial activities

No	Organisation/ Community/ Comments, Concerns and Suggestions
	
13	<p>Ghana Heritage Conservations Trust (GHCT)</p> <p>Persons Consulted Mr. Martin Alfa, Executive Director, Mr. Jonathan Yaba, Programmes Officer, Mr. Kwesi Daniels, Administrator</p>
	<ul style="list-style-type: none"> • The funds for the operations of GHCT is from the interests that accrue from a \$2million seed money invested the USAID and GoG in the USA • The GHCT is managed by a management team that reports directly to a 17- Member Board of Trustees • The committees of the Board include the Executive Committee, Parks Committee, Monuments Committee, Communication and Marketing Committee. • There are other non-board committees such as the Joint Management Steering Committee composed of personnel from GHCT and Regional Wildlife division of the Forestry Commission, and Community Advisory Committee composed of GHCT, Traditional Authorities and relevant MMDAs • The smooth operation of GHCT is as a result of good collaboration from the Kakum Conservation and GMMB • The office takes care of the management and maintenance of facilities at the Kakum Park. • The office also provides funds to GMMB for maintenance works • Revenue share from the operation of the Kakum park is almost at a ratio of 1:1 between FC and GHCT • Human Resource capacity is a challenge to the office • GHCT is responsible for the development of communities around the Kakum Park • There will be the need for offices and arrangements in other regions to manage other tourist facilities for efficiency • Public Private Partnership should be encouraged within the tourism sector • The GHCT annual Budget is approved by the Board of Trustees and funds disbursed accordingly □ GHCT has a good relationship with the Ghana Tourism Authority

No	Organisation/ Community/ Comments, Concerns and Suggestions
	
14	<p>Opinion Leaders of Abrofo Mpoano Fishing Community</p> <p>Persons Consulted Mr. Kobina Benya, Linguist Mr. Kofi Ackon, 2nd Linguist, Mr. Kobina Nyamekye, Secretary</p>
	<ul style="list-style-type: none"> • The community hosts the Cape Coast Castle • The Cape Coast castle and tourist activities do not unduly interfere with the community's activities • The community should be supported with some of the revenue generated from the castle • Staff within the castle are not employed from their community • Most of the stealing cases reported at the Castle do not involve the local community. These are persons from far away suburbs of Cape Coast and are quickly handed over to the police when caught. • Tourists should be sensitized by their tour guides on the dangers of staying out late. • The sole occupations for the people within the community are fishing for the men and fish smoking for the women. • The community wishes for the construction of breakwaters to aid their business • Trawling activities has affected the fish catch and their revenues • The community lacks sanitation facilities. The only 12 seater facility is in a deplorable state hence the rampant open defecation along the beaches • There is a clinic within the community which was abandoned after completion, three years ago • No Corporate Social Responsibility activity is carried out by GMMB to benefit the community • There is potable water in the community from Ghana Water Company Limited. • The closest school to the community is within a walking distance.
No	Organisation/ Community/ Comments, Concerns and Suggestions



agreement:.....

.....
.....

If agreement was not reached, specify the points of disagreement:.....

.....
.....

.....

Signed (Conciliator): Signed (Filer/Complainant):

Signed:

(Independent Observer eg. Assembly Member/Opinion Leader)

Date:

Implementation of Agreement

Date of implementation:

Feedback from Filer/Complainant: Satisfied Not Satisfied

If satisfied, sign off & date:.....
(Filer/Complainant) (Conciliator)

If not satisfied, recommendation/way forward:.....

.....
.....

.....
(Signature & date of Filer/Complainant)
Conciliator)

.....
(Signature & date of

GRM general log

Ref. No.	Date & Time of Receipt of Complaint	Comm Channel (Phone, Box, Letter, email, etc.)	Location of Receipt	Issue Type (Request Concern Suggestion Grievance)	Particulars of Complainant				Particulars of Issue Raised					Re mark
					Name	Address	Phone No.	Age/Sex	Summary of Issue	Action Under taken	Date of Action	Reso-lution Status	Date for Feed back to Com-plainant	

Accident and Incident Register

Code ID	Date and time of the incident or accident	Name of Injured worker, age and address	What task was the worker doing at the time of the incident or accident	Nature of the accident or incident	Cause of the accident or incident?	Immediate Action taken	Was this a notifiable occurrence	Name of person filling out this report.

Annex 8: PHYSICAL CULTURAL RESOURCES MANAGEMENT PLAN

Introduction and Background Information

Background of the Project

The Tourism, Art & Culture Sector Improvement Project, will specifically support reforms in the Ghana Tourism Strategy and Sector Development Implementation Roadmap, as a starting point towards the revitalization of the sector. The proposed project will involve rehabilitation and refurbishment of old heritage buildings and tourism facilities, Construction and upgrading of private and public buildings, Construction and Upgrading of access roads, De-silting of waterways, Construction of water associated infrastructure such as jetties, bridges etc., Relocation of settlements, Solid waste management and Provision of sanitation facilities (public toilets, urinals etc.).

The overarching project development objective is to promote the potentially transformative sectors for an accelerated and inclusive economic development agenda, thereby creating job opportunities. The specific objectives of the project are: (i) to update and restructure Ghana's tourism strategy, as a starting point towards revitalization of the Ghanaian Tourism sector; (ii) to Develop and implement a roadmap for tourism enhancement; (iii) Use of ICT to regularize collection and mobilization of tourism revenues; (iv) capacity building of practitioners and citizenry in general for enhancement of tourism experience; (v) support for MSME's towards restoration of existing tourist sites and setup of new facilities; (vi) beach sanitation improvement and commercialization; and (viii) facilitation of hassle free entry to Ghana (e-visa) as well as improvement of tourism safety and security through ICT. The proposed project has four primary components: (1) Strengthening institutions and the tourism enabling environment; (2) Developing Tourism Sites and Destinations; (3) Enterprise Support Program; and (4) Project management, Monitoring & Evaluation. The activities in Component 2 will involve provision of infrastructural services (civil works support ranging from rehabilitation of potential tourist and existing sites). Matching grants to small and medium enterprises will also be provided under Component 3 to support SME growth in the tourism sector. The potential sites to be selected under this assignment will benefit from the project. The project is expected to: (1) Increase the number and expenditure of tourists on tourism activities; (2) Increase investments and jobs in the tourism market in Ghana; and (3) Create a more inclusive sector (geographically and by supporting linkages throughout its value-chain).

The proposed project is rated Category B and given the specific sites and locations of project interventions have not yet been identified, the project is required to prepare an Environmental and Social Management Framework (ESMF) which would seek to mainstream all environmental and social concerns into the preparation, design and implementation of the project. The ESMF must be prepared, approved and disclosed publicly in Ghana and at the World Bank before the Bank will appraise the project.

In line with the World Bank's commitment to sustainable development, five Safeguards policies have been triggered to support the project development objectives. The policies include the Environmental Assessment (OP/BP 4.01), Natural Habitats (OP/BP 4.04), Physical Cultural Resources (OP/BP 4.11), Forests (OP/BP 4.36), and the Involuntary Resettlement (OP/BP 4.12). The Ghana EPA environmental assessment procedures (EPA LI 1999 (1652)) have also been used to guide the preparation of this ESMF.

Institutions Responsible for the implementation, Administration and Management Plan of Physical and Cultural Resources

Ministry of Tourism, Arts and Culture (MoTAC)

The Ministry of Tourism was created in 1993 and has gone through a number of transformations over the years. The vision of the Ministry is to realize the sector's full potential in contributing to economic wealth, poverty reduction, environmental conservation, national cohesion, and achieve greater GDP growth. The principle functions of the Ministry are: Policy formulation; Planning and development; Promulgation of legislation and regulations; Encouraging investment; Developing human resources for the sector; Intergovernmental and industry relations and International cooperation and relations

Ghana Tourism Authority

The Ghana Tourism Authority is the implementation and advisory arm of the Ministry. It was formed by the Tourism Act 817 in 2011 and replaces the Ghana Tourist Board. Its functions are: The regulation of tourism enterprises namely accommodation, catering, travel and charter operations through registration, inspection, licensing and classification; The promotion and marketing of tourism, both in Ghana and outside Ghana, including the publication of tourism publicity and promotional materials, and participation in fairs and exhibitions; Carrying out research and studies on trends in the tourism industry both at home and abroad to aid decision and policy-making and Facilitating the development of tourist facilities and products.

Ghana Tourism Development Corporation

The Ghana Tourism Development Corporation (GTDC) is a para-statal organisation in which the GTA has a 40 per cent stake. Other shareholders are Bank of Ghana, National Investment Bank and State Insurance Corporation. It was set up in 1972 as a limited liability company to encourage tourism development in Ghana. The stated objectives of the company are to: Promote and mobilize resources for investment in tourist undertakings and services; Seek equity participation in joint ventures with Ghanaians as well as foreign concerns and individuals in tourist development projects and Carry on any other business which may render profitable to the operations of the company.

Hotel and Catering Tourism Training Institute

The Hotel and Catering Tourism Training Institute (HOTCATT) was established in 1991, just before the formulation of the National Tourism Development Plan, with financial support of the United Nations Development Programme (UNDP) and the International Labour Organisation (ILO). Its objective is to develop and enhance qualified manpower in the tourism industry. At the time of the plan, the Institute

was located at interim premises. The training is to focus on hotel and catering operations of Front Office, Housekeeping, Food Production, Food and Beverage Service, and Tour Guiding.

Ghana Museums and Monuments Board (GMMB)

The Ghana Museums and Monuments Board (GMMB) is the legal custodian of Ghana's material cultural heritage (movable and immovable heritage). The Board was established in March 1957 – on the eve of Ghana's independence - as a result of the merger of the then interim Council of the National Museum of the Gold Coast and the Monuments and Relics Commission. The GMMB is governed by the National Liberation Council Decree (NLCD) 387 of 1969, now known as Act 387 of 1969, which was further strengthened by the Executive Instrument (E.I.) 29 of 1973.

The Ghana Museums and Monuments Board undertakes the following functions/activities:

- Equipping and managing all material cultural (movable and immovable) heritage of the nation
- Establishing, equipping and managing new museums
- Controlling the export, import, sale and change of ownerships of material cultural property through licensing and issuance of permits
- Establishing a National Register and keeping inventory of all material cultural (movable and immovable) heritage of Ghana
- Identifying and recommending for declaration as national monuments, structures, objects and sites of historical and cultural significance
- Undertaking research and publication of all matters relating to material cultural (movable and immovable) heritage.

The Ghana Museums and Monuments Board comprises two main divisions: The Museums and the Monuments Divisions. These divisions are supported by three auxiliary departments:

- Education and Interpretive Department
- Administration and Finance Department
- Public Relations/Marketing Department

Forestry Commission

The Forestry Commission of Ghana is responsible for the regulation of utilization of forest and wildlife resources, the conservation and management of those resources and the coordination of policies related to them. The Commission embodies the various public bodies and agencies that were individually implementing the functions of protection, management, the regulation of forest and wildlife resources. These agencies currently form the divisions of the Commission:

- Forest Services Division (FSD)
- Wildlife Division
- Timber Industry Development Division (TIDD)
- Wood Industries Training Centre (Forestry Commission Training School)
- Resource Management Support Centre (RMSC)

The Wildlife Division is responsible for the management of the conservation areas in the country including the Ankasa and Kakum parks. It is the aim of the Commission to be a corporate body of excellence in the sustainable development management and utilization of Ghana's forest and wildlife resources meeting both national and global standards for forest and wildlife resource conservation and development.

Environmental Protection Agency

The Environmental Protection Agency is the body responsible for ensuring compliance with laid down ESIA procedures in Ghana in accordance with the EPA Act 1994 (Act 490) and its amendment and Agency is expected to give environmental approval for Projects. The ESIA is being applied in Ghana to development projects as well as other undertakings as an environmental permitting pre- requisite and a major environmental management tool. The EPA is represented in all the ten (10) regions of the country and will support the project by exercising its permitting and monitoring powers. Though the Agency's technical capacity may be adequate there is some concern with regard to logistics especially transport and personnel which may therefore limit its effectiveness.

The Ghana EA procedures are largely in agreement with the World Bank policies and procedures and the former is now well entrenched in the country to assure satisfactory environmental and social performance of the potential projects to be developed under this project.

Metropolitan, Municipal and District Assemblies (MMDAs)

The Ministry of Local Government and Rural Development (MLGRD) exists to promote the establishment and development of a vibrant and well-resourced decentralized system of local government for the people of Ghana to ensure good governance and balanced rural based development. The Government of Ghana has been pursuing a policy of decentralisation to:

- Establish institutions through regional participation in decision making, and
- Devolve power and authority to the local level

Traditional rulers and chiefs

Traditional rulers are important to tourism development as often they own or control land that may be appropriate for tourism development, have strong ideas and opinions about what should be developed in their jurisdiction and can strongly influence local communities. Tourism should always be developed with the acceptance participation of the local communities living in the area. Where there is conflict between local chiefs, this often affects tourism development and community participation.

1.3 Legal and Institutional Frameworks.

Physical Cultural Resources in Ghana are managed by the following policies and legal instruments:

1.3.1 Policy

National Environment Policy (2013)

The Ghana National Environmental Policy was formulated in 1995 and revised in 2013. The ultimate aim of the National Environmental Policy of Ghana is to improve the surroundings, living conditions and the

quality of life of the entire citizenry, both present and future. It seeks to promote sustainable development through ensuring a balance between economic development and natural resource conservation. The policy thus makes a high-quality environment a key element supporting the country's economic and social development.

National Environmental Sanitation Policy dated April 2010

The revised environmental sanitation policy seeks to refocus the priorities of the sector, so it is forward looking and effectively embraces the challenges of changing life-styles associated with modernization and improving wealth status. The policy lays the basis for developing a systematic approach and framework for identifying and harnessing resources for value-for-money (economy, effectiveness and efficiency) services to all.

National Water Policy

The National Water Policy was formulated in 2007 within the context of Growth and Poverty Reduction Strategy (GPRS II), New Partnership for Africa's Development (NEPAD) and the Millennium Development Goals (MDGs). The policy objective is to "promote an efficient and effective management system and environmentally sound development of all water resources in Ghana." (Government of Ghana, 2007:12). The highlight of the document is the recognition that water resources have competitive and conflicting uses and is organized around three themes namely water resources management, urban water supply and community water and sanitation.

The water resources management theme discusses issues relating to flood abatement under focal areas 1 and 6 that cover integrated water resource management and climate change/variability respectively. In both focal areas, there is an acknowledgement that water resources are finite and vulnerable given its multiple uses. The plan recognizes the need to integrate water resources planning with land use planning activities and adopt river basins as planning units. Finally, water resources were to be protected from human activities and river basin management was to be integrated with coastal zone and wetlands management. These sections also make statements about the threat posed by extreme weather events, notably flooding.

2012 Forest and Wildlife Policy

The 1994 Forest and Wildlife Policy was revised in 2011 and subsequently approved in 2012. The policy aims at the conservation and sustainable development of forest and wildlife resources for the maintenance of environmental stability and continuous flow of optimum benefits from the socio-cultural and economic goods and services that the forest environment provides to the present and future generations, whilst fulfilling Ghana's commitments under international agreements and conventions.

The objectives of the policy are to manage and enhance the ecological integrity of Ghana's forest, savannah, wetlands and other ecosystems; to promote the rehabilitation and restoration of degraded landscapes through plantations development and community forestry; to promote the development of viable forest and wildlife based industries and livelihoods; and to promote training, research and technology development that supports sustainable forest management. This new policy seeks to address

the limitations of the preceding policy of 1994 while also taking advantage of emerging global approaches such as Voluntary Partnership Agreements (VPA), Forest Certification and Reducing Emissions from Deforestation and forest Degradation (REDD), which have far reaching implications for the forest and wildlife industry as well as for local livelihoods. It is the aim of the Commission to be a corporate body of excellence in the sustainable development management and utilization of Ghana's forest and wildlife resources meeting both national and global standards for forest and wildlife resource conservation and development.

National Land Policy, 1999

The policy is conservation sensitive with potential for ecosystem maintenance, biodiversity and scenic preservation under protection and leaving management of such lands under the collaborative effort of major stakeholders including the government and the community.

- (a) The use of any land in Ghana for sustainable development, the protection of water bodies and the environment and any other socioeconomic activity will be determined through national land use planning guidelines based on sustainable principles in the long term national interest.
- (b) All lands declared as forest reserves, strict nature reserves, national parks, wildlife sanctuaries and similar land categories constitute Ghana's permanent forest and wildlife estates, and are "fully protected" for ecosystem maintenance, biodiversity conservation and sustainable timber production.
- (c) Fully protected land areas as well as timber and wildlife protected areas may be used for the purposes of education, research, recreation and tourism, provided that such uses are compatible with the conservation of the environment.
- (d) Land categories outside Ghana's permanent forest and wildlife estates are available for such uses as agriculture, timber, mining and other extractive industries, and human settlement within the context of a national land use plan.
- (i) Unless approved by the appropriate public authority, no land use change of any kind will be countenanced.
- (m) All land and water resources development activities must conform to the environmental laws in the country and where Environmental Impact Assessment report is required this must be provided. Environmental protection within the 'polluter pays' principle will be enforced.

The relevant national laws and legislation particularly to guide the preparation of the ESMF for the proposed project include the following:

The Ghana Tourism Act, 2011: The Act 817 establishes the Ghana Tourism Authority with the objective to promote the sustainable development of the tourism industry internationally and within the country and with the following functions:

- Implement and ensure compliance with the Regulations developed in accordance with this Act;
- Grant licenses for the tourism industry, regulate and supervise tourism enterprises;
- Regulate and monitor the activities of licensees;
- Initiate, conduct, promote and encourage studies for the growth and development of the tourism

industry;

- Oversee the administration of the Tourism Development Fund and ensure that the Fund is used for the required purposes;
- Ensure collaboration with other public, private and international agencies;
- Ensure the management and development of appropriate designs for tourist sites;
- Investigate and take measures to eliminate illegal, dishonorable, unsound and improper activities in relation to any activity regulated under this Act;
- Establish standards, guidelines and codes of practice in relation to carrying on or running a tourist enterprise and attractions;
- Ensure pro-poor, sustainable and responsible tourism;
- Develop standards and guidelines for designs for use at tourist attractions and enterprises to reflect Ghanaian culture;
- Take appropriate measures for the safety and security of consumers of the tourism industry;
- Collect, compile and publish information and statistics in respect of activities regulated under this Act;
- Advise the Minister on policy issues generally on matters related to the tourism industry;
- Identify and acquire suitable land for tourism development; and
- Perform any other function incidental or conducive to the attainment of the object of the Authority.

The State Lands Act, 1962 The Act 125 vests the authority to acquire land for the public interest in the President of the Republic. It also gives responsibility for registering a claim on the affected person or group of persons, and provides details of the procedure to do this. The State Lands Act, 1962 provides some details to be taken into consideration when calculating compensation such as definitions for (1) cost of disturbance, (2) market value, (3) replacement value, etc.

Administration of Lands Act of 1962 (Act 123) gives the President power to acquire stool land that will be held in trust (in the public interest) and vests the management of all stool land revenue in the central government.

Land Title Registration Law of 1986 (PNDCL) 153 provides for the registration of title to lands.

Lands Commission Act, 2008 (Act 767) The Lands Commission Act 2008 establishes the Lands Commission to integrate the operations of public service land institutions in order to secure effective and efficient land administration to provide for related matters. The objectives of the Commission include among others to:

- Promote the judicious use of land by the society and ensure that land use is in accordance with sustainable management principles and the maintenance of a sound eco-system; and
- Ensure that land development is undertaken in conformity with the nation's development goals.

Office of the Administrator of Stool Lands Act 1994, Act 481: The OASL Act 1994, Act 481 establishes the Office of the Administrator of Stool Lands as enshrined in Article 267 (2) of the 1992 Constitution and it is responsible for establishment of stool land account for each stool, collection of rents and the

disbursement of such revenues. The Administrator is charged with the management of stool lands and in accordance with the provisions in the 1992 Constitution, 10% of the gross revenue goes to the Administrator of Stool Lands for administrative expenses whilst the remainder is disbursed as follows:

- 25% to the stool through the traditional authority for the maintenance of the stool;
- 20% to the traditional authority;
- 55% to the District Assembly, within the area of authority of which the stool lands are situated.

Ghana Museums and Monuments Board Act 387, 1969 and later strengthened by the Executive Instrument 29 (1973) established the GMMB as the legal custodian of Ghana's material cultural heritage (movable and immovable).

Forestry Commission Act of 1999 (Act 571) Forestry Commission Act, 1999 (Act, 571) – This Act repealed Act 453 and re-establish the Forestry Commission as a semi-autonomous corporate body and also brought under the Commission, the forestry sector agencies implementing the functions of protection, development, management and regulation of forest and wildlife resources. Section 2 (1) states The Commission shall be responsible for the regulation of the utilization of forest and wildlife resources, the conservation and management of those resources and the co-ordination of policies related to them.

Forest Protection Decree of 1974 (NRCD 243) attempts to protect the integrity of forest reserves by prohibiting virtually all activities therein if done without the written authorization of the Forestry Department. Forest Protection Decree, 1974 (NRCD 243) – This Act defined forest offences and prescribed sanctions and or penalties for such offences.

The Forest Protection (Amendment) Act 2002 (Act 624) – This Act repealed the Forest Protection (Amendment) Law, 1986 (PNDC 142), and amends the Forest Protection Decree 1974 (NRCD 243) to provide for higher penalties for offences. It reviewed forest offences fines upwards and introduced joint liability in the commitment and prosecution of forest offences.

Water Resources Commission (WRC Act 1996, Act 522): The Water Resources Commission Act, 1996 (Act 522) establishes and mandates the Water Resources Commission (WRC) as the sole agency responsible for the regulation and management of the utilisation of water resources and for the co-ordination of any policy in relation to them.

Section 13 prohibits the use of water (divert, dam, store, abstract or use water resources or construct or maintain any works for the use of water resources) without authority. Section 16 empowers the Commission to grant Water Rights (water use permits) to prospective users. The Act states under Section 24 that any person who pollutes or fouls a water resource beyond the level that the EPA may pre-scribe, commits an offence and is liable on conviction to a fine or a term of imprisonment or both.

The Environmental Protection Agency (EPA) Act, 1994 (Act 490): This Act establishes and mandates the EPA to seek and request information on any undertaking that in the opinion of the Agency can have adverse environmental effects and to instruct the proponent to take necessary measures to prevent the adverse impacts. The EPA Act, 1994 (Act 490) gave mandate to the Agency to ensure compliance of all

investments and undertakings with laid down Environmental Assessment (EA) procedures in the planning and execution of development projects, including compliance in respect of existing ones.

Part II of the Act 490 deals with pesticides control and management and this was formally an Act on its own (Pesticides Control and Management Act of 1996, Act 528). This section of Act 490 provides the rules for registration, pesticides classification, approval, clearance, using, disposing of and non-disclosure of confidential information, the granting of license labeling and pesticides inspections.

The Environmental Assessment Regulations of 1999, LI 1652: The Environmental Assessment Regulations of 1999, LI 1652 enjoins any proponent or person to register an undertaking with the Agency and obtain an Environmental Permit prior to commencement of the project. It indicates the EIA process and provides list of environmentally sensitive areas as well as possible undertakings requiring EIA.

Several public sector institutions represent tourism in different capacities, including:

- The Ministry of Tourism and Arts and Culture (MOTAC)
- The Ghana Tourism Authority (GTA)
- Ghana Tourism Development Corporation (GTDC)
- Hotel and Catering Tourism Training Institute (HOTCATT)
- Metropolitan, Municipal and District Assemblies (MMDA)
- Environmental Protection Agency
- Forestry Commission
- Water Resources Commission

1.3.2.3 The World Bank OP 4.11 Physical Cultural Resources

The objective of this policy is to assist borrowing countries to avoid or mitigate adverse impacts on physical cultural resources from development project the Bank finances. In addition, it states that the impacts on physical cultural resources resulting from project activities including mitigating measures may not contravene either the borrower's national legislation or its obligations under relevant international environmental treaties and agreements. Paragraph 9 provides the guidance for preparing PCR management plans and also chance finds procedures.

2.0 The Purpose of the plan.

During the ESIA and RPF studies the physical and cultural resources were also documented and evaluated. This plan forms part of the Environmental and Social Management framework (ESMF) developed during the ESIA study for the backbone project. Its role is to specify how the physical and cultural resources, i.e. archaeological, cemeteries, paleontological and botanical remains will be managed to ensure adequately considerations in conservation and project development, especially during design, construction and operation.

The format of the PCR framework is straightforward. The legal and institutional frameworks for the management and conservation of PCR are briefly outlined. The PCR i.e. archaeological, artifacts, cemeteries, paleontological and botanical remains is then described and discussed in some detail. It is divided into a number of discrete categories, each of which is considered in terms of its significance and its potential. Finally, a series of conservation and management measures are presented.

3.0 Physical Cultural Resources in the project impacted area

Investigation and archaeological surveys prior to the implementation of the project were undertaken for the purpose of recognizing the PCR in the area.

3.1. Identified Physical Cultural Resources

The potential subprojects to be identified with the Ghana tourism products in the Western and Central Region include the following:

The Western Region

The Western Region of Ghana is an integrated complex of beautiful safe beaches and African touch beach resorts. It has the largest collection of European trading forts (later used in the slave trade); the highest tropical forests; numerous mines, picturesque villages and friendly people; and old architectural styles and vivacious festivals. The Western Region has a rich heritage demonstrated by the number of castles still open to visitors:

- Fort St Appolonia at Beyin
- Fort cross at Dixcove (1693)
- Fort Batensteyn (1656) at Butri
- Fort Groot Fredericksburg at Princess Town
- Fort S. Antonio at Axim (1515)
- Fort Dorothea (ruins) at Akwida
- Fort Sebastian at Shama

The Village on Stilt of Nzulezu

An amazing village where life goes on in the centre of lake Tadane, just 90km west of Takoradi. The houses are built on stilts, and traditional village life adapts to the watery conditions. The excursion from Beyin involves a walk through the reeds at the lake's edge, and a trip in a dugout canoe to the village. The village welcomes visitors every day except Thursday, which is a sacred day.

Akatekyi Crocodile Pond

30km west of Takoradi, the local fetish priest entices the crocodiles from the water with a live chicken. Visitors are welcome every day except Wednesday, a sacred day.

The Beaches of the Western Region

Western region is famous for some of the best beaches in Ghana. Some of the most popular beaches are:

- Busua Pleasure Beach – only 5km from fort metal cross

- Sports Club Beach – behind the Atlantic hotel in Takoradi
- Ajua Beach – just 200metres from Dadowa lagoon
- Princess Town Beach – off the Takoradi/Elubo highway
- Mimia Beach – a secluded beach with rocky cave perfect for picnics.

Dr. Nkrumah's Grave

The original grave of Dr. Nkrumah, first President of Ghana and now buried in the mausoleum in Accra, can be found at Nkroful, 83km west of Takoradi.

The Mines of Ghana

The western region has several mines that may be visited, by prior arrangement. The main sites are:

- Nsuta Manganese Mine – 20km southeast of Tarkwa
- Prestea Goldmine – 40km north of Tarkwa
- Tarkwa Goldmines – founded in the 1800s just 92km northwest of Takoradi

Cultural Festivals & Events

Sekondi Kundum: Oral tradition states that a hunter from Aboade saw dwarfs dancing to the rhythm of strange music while on a hunting expedition. The hunter watched these strange creatures perform their strange dance for one month and later brought the dance home. Another legend also says that there existed in the village of Aboade a palm tree, which is associated with the origin of the Kundum Festival. The fruits of this tree used to ripen once in a year, and with time, this period became a symbolic calendar in the lives of the people. The ripening of the palm fruit became the signal for the festival to begin.

The Nzemas later adopted Kundum. It is therefore not only the Ahantas who celebrate Kundum, but also the Nzemas. The Sekondi people also adopted Kundum when they settled at Sekondi. Although there are similarities in the way Kundum is celebrated among these people, there are some unique features in the way it is celebrated in every district. Through these festivals, the people remember their ancestors and ask for their help and protection. The festivals are also used to purify the whole state.

The Sekondi Kundum Festival may be regarded as a harvest festival, as well as a period for remembering the dead, cleansing the community and setting new goals for the coming year.

When the paramount chief sits in state to receive homage from his subjects, development projects are planned and means for raising funds are considered.

Akatekyi crocodile pond

About 30km west of Takoradi, at the Akatekyi Lagoon, this is a pond where crocodiles are enticed from the water by the incantations of a fetish priest and the protests of a live fowl.

Ankasa Conservation Area

Ankasa Conservation Area is twin Wildlife Protected Area comprising Nini-Suhien National Park and the Ankasa Resource Reserve. It is about 500km² and is the only reserved area located in the Wet Evergreen

Forest Zone. The Southwestern corner of the reserve is about 5 kilometres from the border town of Elubo. Takoradi is about 120 kilometres east.

Being the area with the highest rainfall in Ghana, Ankasa is the richest forest in terms of botanical diversity in the Country. Its natural resources are enough to announce its presence on the world tourism map as haven and Ghana's tourism address therefore, there is no wonder that Ankasa remains as one of the natural treasures of the nation. Its attractions include:

Flora: Being the area with the highest in Ghana, Ankasa is the richest forest in terms of botanical diversity in the Country. About three hundred (300) plant species have been recorded in a single hectare. Notable among the plant is: Makore, Dahoma and Khaya. Ankasa is home to many well know plants including: Marantas, Glory bower, Bloody Lilly. There are also spectacular ferns and orchards.

Fauna: Charismatic and tourist-pulling animals such as the bongo and forest elephant as well as ten (10) primate species including the endangered Diana monkey and west African Chimpanzee abound in Ankasa. Bird fauna is also rich – at least 263 bird species have been recorded so far.

The Water Fall: The Ankasa rainforest serves as shed for many streams and rivers. Three of them from which the forest derives its name are the Ankasa, Nini and Suhien. The fascinating characteristics of these rivers are the rapids found on them. The breezes along the rivers and rattling noise of the rapids are a delight to tourists. The potential for canoeing is been explored.

The Bamboo Cathedral: The spectacular Bamboo Cathedral is located at Nkwanta about 8km from the Ankasa gate of the Park. Though not a church building and has no human Bishop, a priest nor a creed, the site showcases nature's perfect architectural design. The giant and suppliant bamboos bow and criss-cross at their apex as if in a handshake to form a dome. The bamboos plants forming a canopy give the semblance of a cathedral over which the breeze presides a perfect habitation for relaxation.

Camping facilities: There are tourist camps for those wishing to stay for a few nights in the park. The camping facilities are made mainly with local building materials are located at the Ankasa Gate, Elubo Gate and Nkwanta.

The Amansuri Conservation Area

The Conservation is a project been undertaken by the Amansuri Conservation & Integrated Development Project with the aim of managing the pristine Amansuri wetland and its fresh water lagoon. The wetland has the stand of intact swamp forest in Ghana and home to varieties of animals like monkeys, crocodiles, marine turtles and birds. It has been selected as one of the Important Bird Areas in Ghana based on Birdlife International criteria. The project is located within the Western Nzema Traditional Area in the Jomoro District, one of the 11 districts in the Western Region. The area is about 360km west of Accra.

Bia National Park

Bia National Park is bordered to the south with a 563-square kilometer Resource Reserve and is an International Biosphere Reserve Park. The reserves are situated in the transition between the moist

evergreen and semi-deciduous tropical forest and cover much of the drainage for the Bia River. Bia became a protected area in 1935 and an official national park in 1974. Some of the tallest trees left in West Africa are found in this park. There are 62 species of mammals known to exist in the park including 10 primate species (three species of colobus, the Diana monkey and the chimpanzee, Pan troglodytes, among others), leopard, buffalo, the forest elephant, Loxodonta cyclotis, and the bongo, Tragelaphus euryceros. Over 160 species of birds including hawks, eagles, bulbuls, flycatchers, the black-collared lovebird and the threatened white-breasted guinea fowl live in this habitat. The park is the only known home of Agama sylvanus, a newly discovered species of lizard

Tourist attractions in the Central Region

The Region is famous for its ancient forts and castles and beautiful coconut palm shaded beaches. Apart from Cape Coast, Elmina is the next well-known destination for tourists. However, the Region is rich in other fascinating historic places such as Anomabu, Abandze, Komenda and Moree.

Castles and Forts

Three of the castles have been designated World Heritage Monuments by the World Heritage Foundation under UNESCO. They are Cape Coast Castle, Elmina Castle and Fort St. Jago.

West African Historical Museum

The West African Historical Museum is located inside Cape Coast Castle and contains a growing collection of art and cultural objects from various parts of West Africa, for example ceremonial drums, old muskets, shackles from the slave trade and ancient pottery.

Beaches

Some of the best beaches in the Central Region are listed as Brenu Beach, Winneba Beach, Gomoa Fetteh Beach with peaceful lagoons as winter home for migratory birds.

Kakum and Assin Atandanso Nature Reserve

This reserve was formed to protect one of the last vestiges of Ghana's rapidly-vanishing tropical rain forest and the rare wildlife it contains.

The habitats of some of the world's rare and most endangered wildlife species, for example; the nearly extinct Mona Monkey, Bongos, Royals Antelopes, Duikers, Forest Elephants, Giant Forest Hogs, Honey Badgers, African Civet Cats and Forest Buffalos.

Festivals and cultural events

The Central Region's culture is depicted through many interesting and colourful festivals throughout the year. These annual festivals serve a variety of purposes, such as purification of the "stools", cleansing communities of evils, ancestral veneration and supplications to the deities for prosperity and unity.

The festivals' major highlights include drumming, dancing and firing of musketry. Chiefs, adorned in rich Kente cloth and bedecked in gold, are paraded through the town in palanquins, shaded by huge and colourful parasols and include Bakatue, Edina Buronya, and Aboakyir (Deer Hunt) Festival, Fetu Afahye etc.

3.2 Chance findings during project implementation

Investigation and surveys during the implementation of the project should also be undertaken for the purpose of spotting the Physical Cultural Resources in the area. In this PCR management plan, both random and systematic survey shall be employed. Systematic survey shall be conducted in areas with high concentration of PCR through systematic walking over transects using three meters interval from one individual to another in parallel transects. Unsystematic survey shall be conducted in areas with an overgrowth of vegetation and rough terrain.

All cultural materials located or distributed on the way leave corridor shall be recorded, collected and mapped out using a global positioning system (GPS). Shovel test pits (STP) shall be conducted to supplement surface observations in areas with plenty of surface scatters. This will be followed by evaluation of the identified PCR to decide what measures should be taken. The evaluation process will be followed by the exercise of treatment. At this stage the handling and management of the resources will be done according to their tradition, typology and cultural sequence. The last stage will be documentation and publication of the findings recovered from the area in order to share knowledge with professionals and the community at large.

Survey and salvage work shall be undertaken by Environmental/Social safeguards specialists (E/SSSs) with support from qualified professionals recognized and permitted by the museums and monuments Department.

4.0 Capacity Building/Awareness and Mobilization

All non-experts in physical cultural resources involved in execution of the project shall be briefed on the basics of physical cultural resources. The training shall aim at enabling non-experts in physical cultural resources to identify, prevent damage to physical cultural resources, record and report whenever they encounter any cultural recourse along the way leave corridor in the absence responsible personnel.

5.0 Specific roles and Obligation

Roles and obligations of each team member in execution of the plan are described below:

5.1 Environmental /Social Safeguard Specialists (E/SSSs)

The E/SSSs shall function as an overseer throughout the execution of the plan and shall accompany the appropriate and qualified professionals recognized and permitted by the museums and monuments throughout survey and salvage operations. Furthermore, Antiquities officer shall determine the action to be taken at the discovery site within an agreed time. Such actions may include the following:

- Removal of PCR deemed to be of significance;
- Execution of further excavation within a specified distance of the discovery point;
- Extension or reduction of the area demarcated by the contractor.

The EPA Act 1994 (Act 490) will support the project by exercising its permitting and monitoring powers.

5.2 Consultant

The consultant for this physical cultural recourse will be a qualified professionals recognized and permitted by the museums and monuments. The Consultant shall be responsible in identification, evaluation, treatment and documentation of physical cultural resources in the implementation of plan. Ghana Museums and Monuments Board Act 387, 1969 mandates a consultant to be or employ an expert in physical cultural resources with sufficient scientific training or experience to enable him to carry out the proposed excavation or search satisfactorily. Furthermore, the consultant must prove that he/she has sufficient staff and other resources to enable him to carry out the proposed excavation or search satisfactorily.

The Consultant shall provide a brief description of the project using maps where necessary, and including location, general layout, size, capacity, activities at pre-execution, and during operations phases, staffing and support, facilities and services, and life span of the project.

5.3 Contractor

During the execution of the works, if a PCR comes to light, the contractor shall stop the works and communicate to consultant. However, contractor may decide whether to stop all works, or only the works immediately involved in the discovery depending on the nature of PCR uncounted.

After stopping work, the contractor must immediately report the discovery to the PCU. With the approval of the PCU, the contractor is then required to temporarily demarcate, and limit access to, the site. The contractor will be entitled to establish an agreement with consultant and/or PCU/MoTAC for additional services or resources under a separate contract.

5.4 Other Project Staffs

Specialists in other fields of study and allied staffs shall communicate to the consultant on any physical cultural resources that they consider the consultant or a team has not accounted for evaluation, treatment and documentation. On top of that, other project staff shall be liable to communicate to the consultant in case of any chance findings during the execution of the project.

6.0 Monitoring and Reporting Arrangements

The findings of the physical cultural resources management shall be disclosed as a supplementary report on PCR after the site has been surveyed. Exceptions to such disclosure would be considered when PCU/MoTAC, in consultation with the Bank and persons with relevant expertise, determines that

disclosure would compromise or jeopardize the safety or integrity of the physical cultural resources involved or would endanger the source of information about the physical cultural resources. In such cases, sensitive information relating to these particular aspects may be omitted from the EA report. Throughout project implementation, PCU/MoTAC reports on compliance with measures agreed with the Bank on the basis of the findings and results of the EA.

Findings which may impact in any way upon the implementation schedule of the project will be reported by the Consultant as soon as such information becomes available, without waiting for a formal reporting date.

The Consultant will submit a brief Inception Report within two weeks of commencement of fieldwork. It will report on the mobilization of the team, the situation on site and any matter which has come to light which may affect, or cause a change in, the planned execution of the survey.

At the end of each month, the Consultant will submit a brief progress report on its work and findings to date, focusing especially on any recommended measures which may require action prior to inundation, together with their estimated costs.

At the end of the work, the Consultant will submit an Interim Report, consisting of a Management Report followed by sections on Work Carried Out, Results, Conclusions and Mitigating Measures Implemented.

7.0 Conservation of Known and Chance findings

Movable PCR found at any project site shall be taken to Ghana Museums and Monuments Board as stipulated under Act 387 of 1969. Identified Immovable PCR but not impacted by the project shall be reported and conserved on site by the Ghana Museums and Monuments department in collaboration with GTA/Local Authorities.

8.0 Management Plan during Design and Construction

This section presents an overview of the management measure i.e. mitigations for the impacts in physical cultural resources for the construction of potential sites. The institutions responsible for the implementation of the mitigation measures at different stages of the project are named. Table 9.1 below summarizes the plan.

Table 9.1: physical cultural resources management plan

S/N	Impact	Mitigation measures	Monitoring Action Typical Monitoring Frequency	Area	Responsible Body
1.0	Construction phase				
1.1	Management Design	<ul style="list-style-type: none"> ❖ Inventory of PCR known to be within the potential sites ❖ Inventory of PCR known close to the potential sites as to be at risk of damage or disturbance 	<p>Monitored during design stage</p> <p>Be done daily during construction</p>	Potential sites	PCU ESS/Consultant
1.2	Impact on existing potential sites	<ul style="list-style-type: none"> - exact location of all potential sites - managing impacts on sacred trees - managing impacts on areas of spiritual significance to local communities 	<p>Monitored during design stage</p> <p>Be done daily during construction</p>	Potential sites	PCU/consultants

1.3	Impacts for the chance finds uncovered during construction	<ul style="list-style-type: none"> - Plant operator to immediately stop working and inform the contractors' supervisor, who will deliver the message to the PCU who will immediately inform the consultant and MoTAC. On his/her part, the consultant will have to advise whether the work should continue or not depending on the evaluation. - (take note: no work shall be continued on the specific area until we get permission from the GTA) 	Be done daily during construction	Potential sites	PCU- ESS Consultant MoTAC GTA Local authorities
1.4	Impacts for the known finds	<ul style="list-style-type: none"> - Spotting Physical Cultural Resources in the area. - Systematic survey shall be conducted in areas with high concentration of PCR through systematic walking over transects using three meters interval from one individual to another in parallel transects. 	Be done before and during the implementation of the project	Potential sites	<ul style="list-style-type: none"> • PCU ESS • Consultant • MoTAC • GTA • Local authorities

		<ul style="list-style-type: none"> - Unsystematic survey shall be conducted in areas with an overgrowth of vegetation and rough terrain. - Evaluation, treatment and Documentation of PCR 			
S/N	Impact	Mitigation measures	Monitoring Action Typical monitoring Frequency	area	Responsible Body
1.5	Impacts on existing potential sites and relocated potential sites	Follow all procedures for relocation of monuments as specified by the Ghana Museums and Monuments Board Act 387, 1969 and later strengthened by the Executive Instrument 29 (1973) established the GMMB as the legal custodian of Ghana's material cultural heritage (movable and immovable).	Be done before and during the implementation of the project	Potential sites	<ul style="list-style-type: none"> • PCU ESS • Consultant • MoTAC • GTA • Local authorities
1.6	Instructions for project staff and contractors regarding physical cultural resources	Conduct a 3 days training workshop for staff involve in the project	Before the commencement of the construction	On site	<ul style="list-style-type: none"> • PCU ESS • Consultant • MoTAC

					<ul style="list-style-type: none"> • GTA • Local authorities
1.7	Conservation of Known and Chance findings	Follow all procedures for preservation and protection of sites and articles of paleontological, archaeological, and historical PCR as specified by the Ghana Museums and Monuments Board Act 387, 1969	During and after the construction	National Museums and on site	<ul style="list-style-type: none"> • PCU ESS • Consultant • MoTAC • GTA • Local authorities