MINISTRY OF SANITATION AND WATER RESOURCES

GAMA SANITATION AND WATER PROJECT (GAMASWAP)

CONSTRUCTION OF ROAD CULVERTS/DRAINS IN GAMA

FINAL ABBREVIATED RESETTLEMENT ACTION PLAN (ARAP) FOR MALLAM JUNCTION DRAIN
MINISTRY OF SANITATION AND WATER RESOURCES (MSWR)

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FINAL ABBREVIATED RESETTLEMENT ACTON PLAN (ARAP) FOR THE CONSTRUCTION OF THE MALLAM JUNCTION DRAIN

July 2017
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EXECUTIVE SUMMARY

The construction of road culverts/drains at Mallam Junction is under the Ga South Municipal administrative jurisdiction. The construction of the GAMA drains and culverts will affect twenty (20no.) people including Ghana Highway Authority and seven telecommunication companies (i.e. MTN, Airtel, Tigo, Vodafone, Glo, Comsys and C-Squared). A section of the N1 highway will have to be cut and the seven affected telcos will be required to relocate their service lines at the project site.

Temporary land occupation (right-of-way for the works) is required under this project. Neither communal properties such as church or mosque or school buildings etc, nor cultural sensitive sites such as cemeteries or shrines will be affected.

The affected crops include plantain, oil palm, mango, orange, and pear. The affected structures are mainly fence walls, a section of the dual carriage road/N1, telecommunication cables, washrooms, carpentry shop, upholstery shop, and concrete pavement. Loss of income is taken care of for owners of affected structures used for commercial purposes as well as operators of businesses or shops that may be affected due to the road blockage during the construction period.

The total Compensation for the full replacement cost for affected properties and businesses for the Mallam Junction Drain Construction under the GAMA Drain and Culverts Project is estimated at Two Hundred and Seventeen Thousand, One Hundred and Eighty-Nine Cedis and Thirty-Three Pesewas (GH¢217,189.33) as at the cut of date of February 8, 2017. The total reinstatement cost component is GH¢200,101.60, whiles the amount that has to be paid directly to the PAPs is GH¢17,087.73.

Amounts of Ghc4,000 and Ghc4343.79 have been estimated for the activities of the proposed ARAP management teams (i.e. Compensation disbursement team, Grievance redress team, and monitoring and evaluation team) to oversee the implementation of the ARAP and contingencies respectively. The total cost estimate for the implementation of the ARAP including direct compensation payments to PAPs, reinstatement works to be carried out by the contractor, budget for the ARAP implementation teams and contingency is Ghc225,533.12.

This ARAP will ensure compliance with the World Bank Safeguard Policy on involuntary resettlement (OP 4.12) and the national laws as well as consistency with the RPF for the GAMA Projects. Where gaps exist between national laws and World Bank policy, the World Bank policy will be applied.
1.0 INTRODUCTION

The Government of Ghana (GoG) has received financing from the World Bank towards the cost of implementation of the Greater Accra Metropolitan Area (GAMA) Sanitation and Water Project (GAMA S&W Project). The objective of the GAMA S&W Project is to increase access to improved sanitation and improved water supply in the GAMA, with emphasis on low-income communities and to strengthen management of environmental sanitation in the GAMA.

The GAMA Project supports eleven Municipal and Metropolitan Assemblies spread across the Greater Accra Region. The project has four components:

- **Component 1** - Provision of water and environmental sanitation services to priority low income areas of GAMA;
- **Component 2** - Improvement and expansion of the water distribution network in the GAMA;
- **Component 3** - Improvement and expansion of waste water and faecal sludge collection, transportation and treatment in GAMA; and
- **Component 4** - Institutional Strengthening.

The Government, through the Ministry of Sanitation and Water Resources (MSWR) intends to apply part of the GAMA S&W Project funds to undertake emergency priority drainage interventions to alleviate the situation in flood prone areas. Over the years, floods have claimed several lives, loss of property and disrupted economic activities resulting from the lack of adequate capacity of road culverts to discharge storm water from streams and communities. The floods often resulted in inundating the entire roads.

The Ministry of Sanitation and Water Resources, in seeking to address the flood risk situation on the drains is committed to complying with Ghanaian laws on land acquisition/compensation issues, and the World Bank Safeguard Policy on Involuntary Resettlement, OP. 4.12 and Environmental Assessment Policy OP 4.01. The Project’s Environmental and Social Management Framework (ESMF), and the Resettlement Policy Framework (RPF) documents guide the management of the environmental and social issues of the GAMA Project.

This report represents the final Abbreviated Resettlement Action Plan (ARAP) for the construction of the Road Culverts/Drains at Mallam Junction in the Ga South Municipality. The report takes into consideration comments from both the client and the World Bank on the draft ARAP as well as an earlier composite ARAP for all the five drains/culverts (at Agbogba, Dome-Kwabenya, Kaneshie First Light, Gbawe and Mallam Junction) submitted to the client in December 2016.

An Environmental and Social Management Plan (ESMP) for the construction of the Mallam Junction drain has been prepared and disclosed to take care of how to mitigate environmental impacts of the project and also mitigation of social issues that will not be addressed under this ARAP instrument.
1.1 **Purpose of the ARAP**

The purpose of the ARAP is to ensure that the proposed drain construction at Mallam Junction addresses potential impacts that will involve land-take, relocation or resettlement, and loss of livelihood of affected people in line with the World Bank Operational Policy on Involuntary resettlement, OP 4.12.

1.2 **Objective of the Assignment**

The objectives of the assignment include:

(i) Prepare an Abbreviated Resettlement Action Plan (ARAP) that is consistent in policy and context to the laws, regulations, and procedures adopted by the Government of Ghana and the World Bank’s operational policy on Involuntary Resettlement (OP4.12) covering displacement, resettlement, and livelihood restoration;

(ii) Conduct consultations with identified project affected persons (PAPS), based on a census of the affected sites;

(iii) Complete a baseline socio-economic survey of the PAPs and host communities;

(iv) Establish local decision making bodies that will be part of the ARAP implementation of the valuation and compensation approaches; and

(v) Develop in a participatory manner a grievance redress mechanism to be covered in the ARAP.

1.3 **Scope of Work of the Assignment as provided in the Terms of Reference (ToR)**

The scope of work for the assignment for the ARAP preparation include the following:

- Description of location of each project activity.
- Description of each project activity and subcomponents.
- Describe the baseline characteristics of each proposed project activity area including land use, physical infrastructure, quality of the living environment, cultural setting, economic and livelihoods activities of people.
- Assess the potential negative impacts related to any land take as a result of the project activities, that could lead to relocation or resettlement or negative effects on livelihoods of affected people—provide indication of the magnitude, distribution, duration and who will be affected. Describe negative impacts on health and social well-being; quality of the living environment; infrastructure, economic material well-being, family and community, and gender relations. Describe the subproject components or activities that have potential to generate the impacts.
- Conduct census survey of displaced persons, and valuation of assets: This involves carrying out of socio-economic census and survey of affected people and assets as well as identifies different types of impacts and establish cut off dates, and methods for the valuation of assets and livelihoods, etc. The socio-economic census should be conducted in participatory manner with the involvement of the potential affected people.
- Description and a matrix of compensation and other resettlement assistance to be provided. This describe the type of compensation to be paid to the different affected people (land, assets, livelihoods, temporary or permanent relocation, etc.).
• Identify existing legal and policy framework for land acquisition and differences between National and World Bank Policies: Describe applicable and relevant legal and policy issues for land acquisition in Ghana and describe any differences between the World Bank and Ghana policies.
• Identify Institutional arrangements for example who will be responsible for release of funding to pay for compensation to project affected persons, and who will be in charge of ensuring that all affected persons have been duly compensated.
• Establish a local decision making body who will be part of the implementation of valuation and compensation approaches.
• Develop Grievance Redress Mechanism in a participatory manner: Describe a grievance redress system that will allow aggrieved persons to seek for redress should they have any issues in the compensation and/or relocation measures implementation.
• Arrangements for ARAP monitoring including indicators and implementation: Indicate how the implementation of the Abbreviated Resettlement Action Plan (ARAP) will be monitored and provide the key monitoring indicators.
• Time table: Provide a timetable for implementation of the ARAP, the time for the Project Affected Persons (PAPs), to leave the sites after full payment of all compensation.
• Budget for the implementation of the ARAP: Provide what the actual budget should be. The budget should include activities of the grievance redress.
• Disclosure of the ARAP documents: Provide disclosure plan for the ARAP document at local, national and international levels.
• Annexes: Include technical design drawings of the undertakings from the Engineer; include photographs showing consultation meetings and record of people and institutions consulted (include photos and minutes), issues discussed and responses given by the stakeholders, including the project affected persons, local communities, NGOs and relevant government agencies; and incorporate these into the ARAP.

1.4 Methodology

The methodology and approach for the preparation of the ARAP involved the following:
• Review of project design documents and baseline study report.
• Review of relevant national and World Bank Safeguard Policy on Involuntary Resettlement.
• Field visits on the following dates:
  o November 3, 2016 – carried out baseline studies and physical inspection of the drain corridor and informed available nearby residents about the Project and the ARAP programme.
  o November 24, 2016 – carried out initial field survey of affected properties and socio-economic survey of PAPs and inform the PAPs about the Project and ARAP.
  o February 2, 2017 – carried out a follow-up physical inspection of the drain corridor with the PCU Safeguard Specialist and informed the identified PAPs about the Project and the ARAP.
  o February 3, 2017 – carried out physical inspection of the drain corridor with the Engineering Consultant, the Contractor and the PCU Safeguard Specialist to confirm the affected drain corridor and project area of influence.
o February 8, 2017 – carried out final socio-economic survey of PAPs and field survey to measure new properties within the RoW and value these affected properties and to inform the PAPs about the valuation principles/methods and the ARAP/compensation programme as well as notify nearby shop operators and petty traders about the Project.

o March 3, 2017 – carried out physical inspection of the drain corridor with PCU Safeguard Specialist, Weruw Consulting Engineering (Engineering Consultant), GWCL and ECG to ascertain if project will affect any water or electrical cable or service lines.

o March 14, 2017 – met the available PAPs on site to explain arrangements to address complaints and for them to select a representative to the Grievance Redress Committee and to provide the phone contact of the elected Assemblyman to the representative.

o March 24, 2017 – together with the Telcos, the engineering consultant and the PCU Safeguard Specialist carried out field assessment of the drain corridor to confirm telecommunication lines that will be affected.

- Consultations with identified key stakeholders (especially PAPs, Weruw Consulting Engineering, the Project Contractor, Municipal Assembly officials, PCU Safeguard specialist, nearby residents/shop owners, Ghana Highway Authority, and utility service providers such as GWCL, ECG, and National Communication Authority as well as the telecom companies.

- Disclosure of compensation payable and Grievance Redress Chapter of ARAP to PAPs in July 2017.

1.5 This Report

In developing this ARAP, close attention was paid to the World Bank Safeguard Policy on Involuntary Resettlement, the GAMA RPF and ARAP/RAP experiences from the Ghana Urban Water Project. The major sections of the ARAP include:

1. Executive Summary
2. Introduction
3. Description of Project
4. Baseline Characteristics of the Project Areas and Potential Negative Impacts
5. Legal and Administrative Framework for compensation and resettlement related issues
6. Principles and Objectives of the ARAP
7. Census and Socio-economic Condition of PAPs
8. Eligibility and Entitlements
9. Vulnerable Groups/Persons
10. Valuation of Assets and Compensation Measures
11. Consultation and Disclosure
12. Grievance Redress Process
13. Monitoring/Evaluation and Completion Audit
14. Implementation Plan
15. Estimated Cost and Funding
16. Bibliography
17. Annexes
2.0 DESCRIPTION OF THE PROJECT

2.1 The Project Location

The proposed drain is located within Mallam in the Ga South Municipality. The location map for the drain is shown in Figure 2-1. Mallam is a major residential town in the Greater Accra Region of Ghana, which is highly prone to flooding. It falls within the Ga South Municipality, which was carved out from the Ga West District in November, 2007 and was established by Legislative Instrument 2134 in July, 2012 with Weija as the Municipal capital.

2.2 Project Design

The project design and scope will include:

i. Construction of a double cell drain 150mx4.0mx2.5m;
ii. Provision of a reinforced concrete open rectangular channel 80.0mx7.0mx2.5m;
iii. Deepening and widening of earth channel 230m long.

The proposed section of the drain to be constructed starts up north of the Total Fuel Station (5°34'12.87"N / 0°17'12.32"W) and ends after the dual carriage road (5°34'7.10"N/0°17'11.41"W, close to the GWCL transmission line as previously shown in Figure 2-1. The layout drawing is provided in Figure 2-2.

2.3 Brief Description of the Proposed Activities/Works at the Project Sites

The major project works/activities to be carried out at the various project sites include:

- Site clearance and removal of vegetation and obstacles within RoW;
- Transport of construction materials and equipment to and from sites;
- Excavation of land and drain to remove concrete, waste, earth materials and debris using heavy duty equipment;
- Cutting of roads (N1 highway at Mallam Junction);
- Concrete works;
- Traffic diversion and management;
- Waste generation and disposal; and
- Reinstatement of affected properties such as fence walls, roads and concrete platforms/pavements etc.
Final ARAP for Mallam Junction Drain. Construction of Road Culverts / Drain in Gama.  


Figure 2-1: Location Map for the Mallam Drain
A: Mallam Junction – Drain Construction

Figure 2-2: Drain Design Layout
2.4 Equipment and Machinery/Raw Materials

The main equipment for the project are listed below:

- Concrete mixer;
- Excavator;
- Backhoe;
- Tipper truck;
- Water storage tanks;
- Light duty vehicles;
- PPEs such as Goggles, hand gloves, safety boots; and
- First Aid Kit/Box.

The main raw materials to be used include sand, cement, chippings, water, nails, iron rods, precast units; and accessories.

2.5 Manpower

About 49 workers have been engaged for the construction activities including managers, supervisors, artisans and labourers. There are 4 project managers/supervisors and 45 artisans and labourers. The artisans and labourers are all Ghanaians. No work-camp has been constructed for the construction workers. All the workers come from their various residents at different localities in Accra.

2.6 Project Duration and Management

The construction of the Mallam Junction Drain will take about 3 months to complete. The contractor is CHINA SHANXI SI JIAN GROUP CO., LTD and the Engineering/Supervising Consultant is Weruw Consulting. The project site was handed over to the contractor on 24th June, 2016. Construction activities at the site officially was suspended on 9th November, 2016, to enable preparation of the ESMP and ARAP to guide project implementation.
3.0 BASELINE CHARACTERISTICS OF PROJECT AREAS AND POTENTIAL NEGATIVE IMPACTS

3.1 Overview of the beneficiary municipality

<table>
<thead>
<tr>
<th>Key characteristics (2010 Census)</th>
<th>Beneficiary Municipality: Ga South Municipality</th>
</tr>
</thead>
<tbody>
<tr>
<td>District Capital</td>
<td>Weija</td>
</tr>
<tr>
<td>Population</td>
<td>411,377. Males represent 48.9% and Females constitute 51.1%.</td>
</tr>
<tr>
<td>Land area</td>
<td>341.838 km²</td>
</tr>
<tr>
<td>Dominant Religion</td>
<td>Christianity (84.9%) and Islam (9%)</td>
</tr>
<tr>
<td>Dominant ethnic group</td>
<td>Akans (50%), Ewe (22.9%), Ga-Dangme (19.1%, i.e. indigenous ethnic group)</td>
</tr>
<tr>
<td>Households</td>
<td>100,701</td>
</tr>
<tr>
<td>Average household size</td>
<td>4.0</td>
</tr>
<tr>
<td>Sanitation/Toilet Facilities</td>
<td>In terms of toilet facilities, water closet (W.C) (26.6%) is commonly used in the Municipality, followed by pit latrine (24.0%) and public toilet (22.0%). A significant proportion of households have no toilet facility (13.5%) and therefore use bushes/beaches or fields as toilet facilities. KVIP (13.2%), bucket/pan (0.2%), and other facilities (0.6%) are among the toilet facilities used in the Municipality.</td>
</tr>
<tr>
<td>Waste disposal</td>
<td>The most widely method of solid waste disposal is through burning (37.8%). About one in ten households (4.3%) dump their solid waste indiscriminately. House to house waste collection accounts for 21.3 percent. For liquid waste disposal, throwing waste onto the compound (43.0%) and onto the street (22.4%) are the two most common methods used by households in the municipality.</td>
</tr>
<tr>
<td>Topography and elevation</td>
<td>The land area of the municipality consists of gentle slopes interspersed with plains in most parts and generally undulating at less than 76 metres above sea level. Elevations in the catchment range from 4m to 180m above mean sea level.</td>
</tr>
<tr>
<td>Geology and soil characteristics</td>
<td>The land area is underlain by shallow rocky soils and basic gneiss inselbergs. The main soil type is the Coastal Savannah Ochorosols, observed to be sandy and clay loams. The coastal sands are pale yellow in colour and without humus or organic matter. Alluvia soils are found at the valley bottoms and the estuary</td>
</tr>
<tr>
<td>Drainage</td>
<td>The streams that drain the project sites include the Lafa (for the Gbawe drain) and the Baale (for the Mallam Junction drain). The total catchment area of the Baale drain is approximately 1,190ha. The Lafa and Baale streams drain into the Sakumo Lagoon</td>
</tr>
<tr>
<td>Encroachment of flood plains</td>
<td>Settlements/residential houses, business structures, fence walls, utility service lines, small farms, fuel stations, mechanics are commonly found within the flood plains.</td>
</tr>
</tbody>
</table>
3.2 Characteristics of the Mallam Junction Drain Area of Influence

The proposed Mallam Drain is to re-channel the existing drain through the Total Fuel Station, and will also connect the existing drain/stream again after crossing the N1 highway. The project area is both commercial and residential. The Total Fuel Station has not been in operation since the Accra June 3, 2015 flood and fire disaster. The major activities and facilities around the project area include:

- Fuel Station (the Total fuel station has been closed due to flood impacts in the area);
- Utility lines (GWCL lines, electricity lines/poles/street lights, underground communication cables belong to the Telcos including MTN, Airtel, Vodafone, Tigo, Glo, Comsys, C-squared) along the N1;
- Vehicular and pedestrian movement on and along the N1 highway;
- Carpentry and upholstery shops;
- Pharmacy;
- Mechanics operating inside the perimeter of a residential house;
- Fence wall and bathroom facilities of two residences;
- Toilet facility/Septic tank;
- Crop farm (plantain, orange, pawpaw, mango, and pear); and

The N1 highway is one of the busiest roads in the country connecting Accra to the Central Region. A section of the road need to be temporary cut to allow for construction of the drain. This would however require permission from the Ghana Highway Authority and the National Security. The Contractor (CHINA SHANXI SI JIAN GROUP CO., LTD) has prepared a Traffic Management Plan to manage traffic flow and pedestrian movement during the cutting of the N1. At the immediate downstream, the drain with its banks are grown with vegetation, mostly weeds and grasses. There are also solid wastes dumped into the drain and along sections of the drain downstream. Wastewater from nearby houses also discharged into the drain.
Plate 3-1: A section of the Mallam Drain through the Total Fuel Station

Plate 3-2: Section of the N1 highway to be cut

Plate 3-3: GWCL line crossing the Mallam Junction drain
3.3 Potential Negative Impacts on Assets, Livelihoods and Access Routes

The implementation of the GAMA Mallam Junction drain project will not require any permanent land acquisition. The project will not physically displace any household. No communal properties such as church buildings or mosque or school buildings etc, nor cultural sensitive sites such as cemeteries or shrines will be affected. The potential negative impacts on assets and livelihoods are provided in the tables below.

Table 3-1: Construction of Drains under Ga South Municipal Assembly

<table>
<thead>
<tr>
<th>Potential Impact on Assets, Livelihoods and Access Routes</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permanent Land acquisition</td>
<td></td>
</tr>
<tr>
<td>No. Temporary land occupation required</td>
<td>Yes. Crops such as plantain, maize, avocado, pear, oil palm will be affected. Yes. Sections of the asphalted N1 road and parts of the Total Fuel Station concrete platforms will be affected. Wooden shops used for carpentry and upholstery activities located within the buffer zone downstream of the drain or within areas that construction equipment may maneuver will be affected. Underground fibre/copper cables belonging to the Telcos along the N1 road RoW will also be affected. Fence walls/ washrooms of two residential facilities close to the drain may be affected during desilting of the drain.</td>
</tr>
<tr>
<td>Crops</td>
<td>Structures</td>
</tr>
</tbody>
</table>
4.0 LEGAL AND ADMINISTRATIVE FRAMEWORK

The construction of the road culverts/drains in GAMA will be done according to Ghanaian Law and World Bank Safeguard policies.

4.1 National Regulatory Framework

The relevant national laws and legislation particularly relevant to resettlement and compensation issues as related to the project include the following:

- The State Lands Act 1962, Act 125;
- The Lands (Statutory Wayleaves) Act, 1963; and

4.1.1 The Constitution of Ghana and the Protection of Individual Property

Displacement of people

The Project has taken note of Clause 3 of Article 20, which states that:

“Where a compulsory acquisition or possession of land effected by the State in accordance with clause (1) of this article involves displacement of any inhabitants, the State shall resettle the displaced inhabitants on suitable alternative land with due regard for their economic well-being and social and cultural values.”

Article 20 of the 1992 Constitution of Ghana provides for the protection from deprivation of property unless such acquisition is made in the interest of defence, public safety, public order, public morality, town and country planning, or the development or utilization of property to promote public interest.

Under the same Article 20 of the Constitution, such compulsory acquisition of property by the State should be made under a law which makes provision for prompt payment of fair and adequate compensation as well as a right of access to a High Court by any person who has interest in or right over the property for the determination of his interest or right and the amount of compensation to which he is entitled.

4.1.2 The State Lands Act, 1962

The State Lands Act, 1962 (Act 125) vests in the President of the Republic the authority to acquire land for the public interest via an executive instrument. In addition, the State Lands Act, 1962, details the different elements to be taken into consideration when calculating compensation include cost of disturbance, market value, replacement value and cost for any other damage. These components are to guide the valuation expert and the resettlement expert to ensure that the PAP receives a fair compensation and is not made worse off.
4.1.3 **The Lands (Statutory Wayleaves) Act, 1963**

The Lands (Statutory Wayleaves) Act, 1963 (Act 186) details the process involved in occupation of land for the purpose of the construction, installation and maintenance of works of public utility, and for the creation of right-of-ways for such works. The key elements of this Act include the following:

- The owner/occupier of the land must be formally notified at least a week in advance of the intent to enter, and be given at least 24-hour notice before actual entry;
- Any damage due to entry must be compensated in accord with the procedures established by the Minister unless the land is restored or replaced;
- In the case of highways, no compensation shall be paid, unless the land taken is more than one fifth of the total holdings of an affected person;
- Where a right of way must be established in the public interest, the President may declare the land to be subject to such statutory wayleave; and
- On publication of a wayleave instrument specifying the area required, and without further assurance, the land shall be deemed to be subject to wayleave. Compensation is then determined and paid, with the right of appeal to a Tribunal established by the President, in parallel with the Lands Act, 1962.

4.1.4 **Lands Commission Act 2008, Act 767**

The Lands Commission Act 2008 re-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.

4.2 **Overview of Land Tenure and Ownership in Ghana**

4.2.1 **Interests in land**

Ghanaian law recognizes a number of interests in land including the following four interests in land:

1) Allodial interest is the highest interest recognized by customary law. It is equivalent to freehold. Allodial titles are normally vested in stools or skins, and also in families or group or individuals.

2) Customary law freehold is a perpetual interest vested in members of the community that holds the allodial title. Customary law freehold implies that the holder can occupy the land and derive economic use of it (usufructuary interest) in perpetuity.

3) Common law freehold is an interest that results from the outright sale or gift of land to a non-member of the community that holds the allodial title by the custodian of this title.

4) Leasehold is a right to occupy and develop the land granted for a certain period (residential development; up to 99 years for Ghanaian citizens and 50 years for non-Ghanaian), usually against the payment of a rent.
4.2.2 Forms of land ownership in Ghana

Land ownership and tenure in Ghana is governed by a system of common law and customary land law, from which have emerged the following categories of landholdings:

- Customary owned (managed by a custodian together with a council of principal elders);
  - Stool/skin lands (is vested in the stool/skin)
  - Family/clan lands (land is vested in the family or clan)
- State (public) owned (are lands specifically acquired by the Government under an enactment); and
- Customary owned but State managed land (owned by the traditional authorities but managed by the State, and is also known as vested land).

4.3 Administrative Framework

The key government institutions responsible for administration of resettlement and compensation issues under this GAMA Projects include:

- Ministry of Sanitation and Water Resources;
- Ga South Municipal Assembly;
- Lands Commission; and
- Environmental Protection Agency.

4.3.1 Municipal Assembly

The current local government structure or the district assembly system is established by two main Acts, namely Act 936 and Act 480. Both Act 936 and Act 480 designate the District/ Municipal/ Metropolitan Assembly as the planning authority, charged with the overall development of the district. Both Acts provide that local people (communities) must participate in the formulation of the District Development Plan.

A key feature of this Assembly System is the involvement of communities or zones who elect their representatives (Assemblymen) to the Assembly. The structure of the Assembly comprises Unit Committees, which are usually formed at the community levels, and the Urban/Town/Area Councils. The municipal assembly relevant to the Mallam Junction Drain Project is the Ga South Municipal Assembly (GSMA) with Gbawe as its capital.

The Ga South Municipal Assembly (GSMA) is the Municipal Assembly under whose jurisdiction the Mallam Junction drain culvert construction project falls. As a beneficiary MMA of the GAMA Sanitation and Water Project, the GSMA is the relevant local government authority for the successful implementation of the project. The GSMA has a GAMA Project Implementation Team (at the Assembly, led by a GAMA Project Coordinator) to coordinate the GAMA subproject activities at the local level and to liaise and provide feedback on progress of implementation between the GSMA and the PCU and then to the Ministry of Sanitation and Water Resources. Consequently, under this drain culvert subproject...
implementation, the GSMA will be playing key ARAP Implementation roles which include Grievance Redress Committee, Compensation payment Team and ARAP implementation monitoring.

4.3.2 Lands Commission

Public and Vested Lands Division
The Public and Vested Lands Management Division of the Lands Commission (established by the Lands Commission Act, 2008, Act 767) is the principal land management organisation of the government. All public land is vested in the President of Ghana and held in trust for the people of Ghana. The Public and Vested Lands Management Division manages all public land on behalf of the President. In each of the ten regions of Ghana, a branch, known as the Regional Lands Commission, performs the functions of the Lands Commission. In addition to managing public lands on behalf of government, other mandates includes:

- Advise the government and local authorities on policy matters, and to ensure that the development of individual parcels of land is consistent with area development plans; and
- Advise on, and assist in the execution of a comprehensive programme of land title registration.

Land Valuation Division
The Land Valuation Division (LVD) was established in 1986 (PNDC Law 42) as Land Valuation Board (LVB), through a merger of valuation divisions operating within different ministries. However, the LVB was brought under the Lands Commission as the Lands Valuation Division (LVD) with the promulgation of the new Lands Commission Act 2008, Act 767. The LVD is responsible for all valuation services for the government, including assessing compensation to be paid as a result of land acquisition or damage to an asset in view of a government project. The Division set rates for crops, which are applicable nation-wide.

The LVD has offices in all the ten (10no.) regions of Ghana and 44 district offices. The district offices are involved only in ‘rating valuation’ and that any valuation taking place has to be undertaken by the Regional offices which have certified valuers. The LVD also keep records of private sector certified valuers.

Survey and Mapping Division
It was established in 1962 under the Survey Act 1962, Act 127 as the Survey Department. The Department was brought under the Lands Commission as the Survey and Mapping Division with the promulgation of the Lands Commission Act 2008, Act 767. The Division supervises, regulates and controls the surveys and demarcation of land for the purposes of land use and land registration. It also supervises, regulates, controls and certifies the production of maps. It is responsible for planning all national surveys and mapping among other functions.
4.3.3 **Environmental Protection Agency (EPA)**

The EPA established under the EPA Act, 1994 (Act 490) is responsible for the protection of the environment and this include the human environment as well. Its functions include amongst others:

- Advise the Minister on the formulation of policies on all aspects of the environment and in particular make recommendations for the protection of the environment;
- Ensure compliance with any laid down environmental impact assessment procedures in the planning and execution of development projects, including compliance in respect of existing projects;
- Act in liaison and co-operation with government agencies, district assemblies and other bodies and institutions to generally protect the environment; and
- To promote effective planning in the management of the environment.

The EPA is the main government body for receiving and reviewing all Environmental and Social Impact Assessment reports. Currently, Resettlement Plan reports sent to the EPA for review are usually attached to the main stream Environmental Impact Assessment (EIA) Report. The Agency is yet to develop a general guideline or format for the preparation of a Resettlement Plan as it has done for the preparation of an EIA.

The EPA has offices in all the ten (10no.) regions of Ghana. The Agency has three offices in GAMA including the Accra East Region with the office located in Tema, Accra West Region with the office located in Amasaman, and Accra Metro office with the office located in the EPA Head office.

4.4 **World Bank Safeguard Policy on Involuntary Resettlement, OP. 4.12**

The World Bank’s safeguard policy on involuntary resettlement, OP 4.12, (April 2013) is to be complied with where involuntary resettlement, impacts on livelihoods, acquisition of land or restrictions to natural resources, may take place as a result of the project. It includes requirements that:

a) Involuntary resettlement should be avoided where feasible, or minimised, exploring all viable alternative project designs.

b) Where it is not feasible to avoid resettlement, resettlement activities should be conceived and executed as sustainable development programs, providing sufficient investment resources to enable persons displaced by the project to share in project benefits. Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement programs.

c) Displaced persons should be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

According to OP 4.12, the resettlement plan should include measures to ensure that the displaced persons are:
a) informed about their options and rights pertaining to resettlement;
b) consulted on, offered choices among, and provided with technically and economically feasible resettlement alternatives; and
c) provided prompt and effective compensation at full replacement cost for losses of assets attributed directly to the project.

If the impacts include physical relocation, the resettlement plan should include measures to ensure that the displaced persons are:
1) Provided assistance (such as moving allowances) during relocation; and
2) Provided with residential housing, or housing sites, or as required, agricultural sites for which a combination of productive potential, location advantages, and other factors is at least equivalent to the advantages of the old site.

Where necessary to achieve the objectives of the policy, the resettlement plan also should include measures to ensure that displaced persons are:
a) offered support after displacement, for a transition period, based on a reasonable estimate of the time likely to be needed to restore their livelihood and standards of living; and
b) provided with development assistance in addition to compensation measures, such as land preparation, credit facilities, training, or job opportunities.

4.5 **Comparison between Ghanaian Regulations and World Bank Safeguard Policy OP 4.12**

There are significant differences between Ghanaian regulations and World Bank requirements. These are summarized in Table 4-1. The GAMA Project will comply with both Ghanaian regulations and World Bank Policy but where there are differences in the requirements, the provisions that secure the highest protection for the affected persons will be applied. Thus, the World Bank requirements will apply, which are deemed to provide higher standards for the environment and poverty reduction.
### Table 4-1: Comparison of Ghanaian Regulations with World Bank Policy, OP 4.12

<table>
<thead>
<tr>
<th>Topic</th>
<th>Ghanaian legislation requirement</th>
<th>World Bank Policy, OP 4.12</th>
</tr>
</thead>
<tbody>
<tr>
<td>Timing of compensation</td>
<td>Prompt <em>(1992 Constitution of Ghana, Article 20)</em></td>
<td>Prior to displacement</td>
</tr>
<tr>
<td>payment</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Calculation of</td>
<td>-Fair and adequate <em>(1992 Constitution of Ghana, Article 20)</em></td>
<td>Full replacement cost</td>
</tr>
<tr>
<td>compensation</td>
<td>-Market value, replacement value, cost of disturbance, other damage <em>(State Lands Act 1962, Act 125)</em></td>
<td></td>
</tr>
<tr>
<td>Squatters</td>
<td>No provision. Are deemed not to be eligible</td>
<td>Are to be provided resettlement assistance (but no compensation for land)</td>
</tr>
<tr>
<td>Resettlement/Displacement</td>
<td>In the event where inhabitants have to be displaced, the State is to resettle them on “suitable land with due regard for their economic well-being and social and cultural values”. <em>(1992 Constitution of Ghana, Article 20)</em></td>
<td>Affected people who are physically displaced are to be provided with residential housing, or housing sites, or, as required, agricultural sites at least equivalent to the old site. Preference to be given to land-based resettlement for displaced persons whose livelihoods are land-based.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Resettlement/relocation</td>
<td>No specific provision with respect to additional assistance and monitoring.</td>
<td>Affected people are to be offered support after displacement, for a transition period.</td>
</tr>
<tr>
<td>assistance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vulnerable groups</td>
<td>No specific provision</td>
<td>Particular attention to be paid to vulnerable groups, especially those below the poverty line, the landless, the elderly, women and children, indigenous peoples, and ethnic minorities.</td>
</tr>
<tr>
<td>Information and</td>
<td>The owner/occupier of the land must be formally notified at least a week in advance of the intent to enter, and be given at least 24-hour notice before actual entry <em>(The Lands (Statutory Wayleaves) Act, 1963, Act 186)</em></td>
<td>Displaced persons and their communities are provided timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementing, and monitoring resettlement.</td>
</tr>
<tr>
<td>consultation</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Disclosure</td>
<td>No specific provision</td>
<td>RPF or RAP should be submitted for public (in-country and infoshop) disclosure purposes</td>
</tr>
<tr>
<td>Grievance</td>
<td>Access to Court of Law <em>(1992 Constitution of Ghana, Article 20)</em></td>
<td>Appropriate and accessible grievance mechanisms to be established</td>
</tr>
<tr>
<td>Use of resettlement</td>
<td>No clear provision</td>
<td>Use RPF, RAP, ARP, process framework</td>
</tr>
<tr>
<td>instrument</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
4.6  Project Measures to ensure compliance with World Bank Policy

In general, the Ghanaian laws and regulations make provision for resettlement framework, including land and Right of Way (RoW) acquisition and compensation matters. However, there are some differences between World Bank guidelines and Ghanaian laws as indicated above.

In order to harmonize such differences and ensure that the criteria used to determine compensations to project affected people satisfies the World Bank requirements as well as the national laws, a Resettlement Policy Framework (RPF) was developed for the GAMA Projects in February 2013 to guide the assessment of all resettlement related issues under the GAMA Projects.

This ARAP ensures compliance with the World Bank Safeguard Policy on involuntary resettlement (OP 4.12) and the national laws as well as consistency with the RPF for the GAMA Projects. Where differences existed between national laws and World Bank policy, the World Bank policy was applied in such cases as provided in the RPF as well as this ARAP. Therefore, adequate measures have been taken in the RPF and this ARAP to ensure compliance with the World Bank Safeguard Policy OP 4.12.
5.0 PRINCIPLES AND OBJECTIVES OF THE ARAP

5.1 Principles

The principles of the ARAP are the basic fundamental requirements that underpins the preparation and implementation of the ARAP.

5.1.1 Minimization of Displacement

In line with the WB Policy 4.12, the proposed Project will minimize displacement through the following measures:

- No dwellings, settlements or households will be relocated and no resettlement will take place, and the design will avoid any destruction of settlement. The project has been designed so that only structures within RoW of drains may be affected by project development.
- For the affected structures and farms/crops, reinstatement and compensation packages will be proposed.
- The project will ensure that affected temporary structures will be relocated to few distances from its original locations to ensure continuation of business of the affected person and the structures returned to its original place if feasible after project completion.

5.1.2 Cut-off Date – Eligibility – 8th February, 2017

The objective of the cut-off date is to establish a deadline date for which project affected persons qualify for entitlement to compensation. Persons entering the Project Area after the Cut-Off Date are not eligible for compensation and/or resettlement assistance.

To ensure compliance with Ghanaian legal requirements and WB safeguard policy OP 4.12, the Valuation Expert together with the consultant carried out an initial field measurement of project affected properties on 24th November 2016 at the various project sites. A final field survey and assessment was carried out on the 8th February, 2017. The consultant engaged the affected persons on the resettlement/compensation processes as well as the grievance redress process and solicited their concerns to inform the preparation of the ARAP.

Persons who encroach on the project areas after the final valuation exercise, which is the cut-off date of 8th February, 2017 are not entitled to or expected to receive any form of compensation unless their claims are investigated and found justified by the Grievance Redress Process put in place as part of this Report.

5.1.3 Community Information and Sensitization

The Project will create a platform using local meetings and the media to periodically engage the public on relevant project information, construction activities and likely project impacts and the
resettlement/compensation programme to ensure project success. Measures instituted to address negative project impacts will be communicated to the public.

5.1.4 *Income and Livelihood Restoration*

One paramount principle of the World Bank Safeguard Policy is that where people are affected by project implementation, the aim of compensation must be that they should be “no worse-off if not better off” after the compensation arrangement has taken place. Measures to ensure the continuation of business of affected persons include the following:

- Compensation for loss of income during the construction phase.
- Relocation of temporary structures used for commercial purposes to very few meters from its original location.
- Movement of such structures back to its original location if feasible

5.1.5 *Asset Valuation and Compensation*

Valuation of affected properties is based on the World Bank Full Replacement Cost approach. Compensation principles will be as follows:

- Compensation shall be paid prior to displacement / destruction of asset or commencement of construction;
- Compensation will be at full replacement value; and
- Concrete pavements or structures that could be reinstated by the contractor will be factored into the contractor’s cost estimates.

By contrast with the depreciated or net value of a structure, the “full replacement value” includes the full cost of materials and labour required to reconstruct a structure of similar surface and standing. In other words, the affected person must be able to have their structure rebuilt in a different location using the compensation paid for the old structure.

5.1.6 *Grievance Mechanisms*

The objective or purpose of the Grievance Redress Procedure is to address and resolve grievances or complaints from affected persons promptly, fairly, and in a manner that is, to the extent possible, acceptable to all parties. The following principles will guide the process:

- meaningful information and consultation to take place before the process leading to displacement is launched in each particular location concerned; and
- a specific grievance registration and processing mechanism will be put in place.
5.2 Objectives of the resettlement/compensation programme

The main objectives of the resettlement related/compensation programme are as follows:

- To ensure that project affected people are consulted and their concerns included in the resettlement/compensation programme for implementation;
- To ensure that project affected people are adequately compensated for loss of crops and structures (either farming or business/residential structure or communal property);
- To compensate the affected units and enterprises for their loss at full replacement cost;
- To ensure that utility service lines including water/electricity/communication lines are relocated without damage.
- To identify vulnerable groups including the elderly, physically challenged, women heads etc among the project affected people and prescribe any special assistance they may require in terms of extra attention during the implementation of the programme; and
- To meet both national regulatory and WB requirements.
6.0 CENSUS AND SOCIO-ECONOMIC CONDITION OF PAPS

In order to appreciate the social impacts of the GAMA Drains Project requiring a resettlement related or compensation measures, a census and socio-economic condition of the PAPs were established. An initial enumeration of the affected persons and properties was undertaken on 3rd November, 2016 and initial field valuation and socio-economic survey of PAPs carried on 24th November, 2016. The final field measurement of affected properties was completed on 8th February, 2017. The methodology for the collection of the socio-economic information included interviews with affected persons, consultations with other stakeholders and relevant literature review.

6.1 Inventory of Affected Persons and Properties

6.1.1 Summary of Inventory of PAPs

The table below provides a summary of the inventory of affected persons. Twenty (20no.) people including seven Telcos and Ghana Highways will be affected under the Mallam Junction Drain Construction Project.

<table>
<thead>
<tr>
<th>Ga South Municipal Drains</th>
<th>No. of PAPs with Movable properties or properties that can be relocated</th>
<th>No. of PAPs with Immovable properties</th>
<th>No. of PAPs affected by loss of income</th>
<th>Total No. of PAPs</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mallam Junction Drain</td>
<td>7no. Telcos including Airtel, MTN, Tigo, Glo, Vodafone, Comsys, C-Squared.</td>
<td>7no</td>
<td>8no</td>
<td>20</td>
<td>2no. PAPs have immovable properties and are affected by loss of income as well</td>
</tr>
</tbody>
</table>

The Full list of persons affected and their entitlements can be found at the GAMA Project Office, Institute of Local Government Studies, Ogbojo, Madina New Road, Accra. Tel: 0302 514739/40
### 6.1.2 Description of Impacts

The project impacts and properties are described in the table below.

#### Table 6-2: Description of project affected persons and properties

<table>
<thead>
<tr>
<th>No.</th>
<th>Property Type</th>
<th>Description</th>
<th>Condition</th>
<th>Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Concrete platform</td>
<td>A 1/3 cut through of a reinforced concrete floor</td>
<td>Good</td>
<td>Demolition</td>
</tr>
<tr>
<td>2</td>
<td>Wooden Structure (Carpentry Shop)</td>
<td>A wooden structure with a cement screed floor roofed with aluminium sheets and enclosed with a ledged and braced door</td>
<td>Fairly good</td>
<td>Demolition/ loss of income</td>
</tr>
<tr>
<td>3</td>
<td>Wooden Structure (Upholstery services)</td>
<td>A wooden structure with a cement screed floor roofed with aluminium sheets and enclosed with a ledged and braced door</td>
<td>Fairly good</td>
<td>Demolition/ loss of income</td>
</tr>
<tr>
<td>4a</td>
<td>Fence wall</td>
<td>Sandcrete block wall plastered and painted both ways</td>
<td>Fairly good</td>
<td>Demolition</td>
</tr>
<tr>
<td></td>
<td>Washroom</td>
<td>Bath/Water Closet</td>
<td>Fairly good</td>
<td>Demolition</td>
</tr>
<tr>
<td>5a</td>
<td>Fence wall</td>
<td>Sandcrete block wall, painted both ways</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Bath/water closet</td>
<td>Plain Concrete floor</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Pipes and accessories for Septic Tank</td>
<td>Water Pipes &amp; Accessories Connection</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Communication cables</td>
<td>Both fibre and copper cables for Telcos including MTN, Vodafone, Airtel, Tigo, Glo, C-Squared and Comsys</td>
<td>Good</td>
<td>Relocation</td>
</tr>
<tr>
<td>7</td>
<td>Dual Carriage Road</td>
<td>Asphalted Dual Carriage Highway (77mm thickness) 47.6m x 11.6m</td>
<td>Good</td>
<td>Demolition</td>
</tr>
<tr>
<td>8</td>
<td>Mechanic shop</td>
<td>Mechanic shop</td>
<td>Good</td>
<td>Loss of income</td>
</tr>
<tr>
<td>9</td>
<td>Welder/ Straighter</td>
<td>Welder working</td>
<td>Good</td>
<td>Loss of income</td>
</tr>
<tr>
<td>10</td>
<td>Carpentry shop</td>
<td>Apprentice at the carpentry shop</td>
<td>Good</td>
<td>Loss of income</td>
</tr>
<tr>
<td>11</td>
<td>Carpentry shop</td>
<td>Apprentice at carpentry shop</td>
<td>Good</td>
<td>Loss of income</td>
</tr>
<tr>
<td>No.</td>
<td>Property Type</td>
<td>Description</td>
<td>Condition</td>
<td>Impact</td>
</tr>
<tr>
<td>-----</td>
<td>---------------------</td>
<td>------------------------------</td>
<td>-------------</td>
<td>--------------</td>
</tr>
<tr>
<td>12</td>
<td>Upholstery service</td>
<td>Apprentice at the upholstery shop</td>
<td>Good</td>
<td>Loss of income</td>
</tr>
<tr>
<td>13</td>
<td>Upholstery service</td>
<td>Apprentice at the upholstery shop</td>
<td>Good</td>
<td>Loss of income</td>
</tr>
<tr>
<td>5b</td>
<td>Mango</td>
<td>1/2 grown</td>
<td>fairly good</td>
<td>Destruction</td>
</tr>
<tr>
<td></td>
<td>Pawpaw</td>
<td>Matured</td>
<td>fairly good</td>
<td>Destruction</td>
</tr>
<tr>
<td></td>
<td>Avocado Pear</td>
<td>1/2grown</td>
<td>fairly good</td>
<td>Destruction</td>
</tr>
<tr>
<td></td>
<td>Plantain</td>
<td>Matured</td>
<td>fairly good</td>
<td>Destruction</td>
</tr>
<tr>
<td></td>
<td>Plantain</td>
<td>1/2 grown</td>
<td>fairly good</td>
<td>Destruction</td>
</tr>
<tr>
<td></td>
<td>Plantain Seedlings</td>
<td></td>
<td>fairly good</td>
<td>Destruction</td>
</tr>
<tr>
<td></td>
<td>Orange</td>
<td>Matured</td>
<td>fairly good</td>
<td>Destruction</td>
</tr>
<tr>
<td></td>
<td>Orange</td>
<td>1/2grown</td>
<td>fairly good</td>
<td>Destruction</td>
</tr>
<tr>
<td>4a</td>
<td>Oil Palm (Agric)</td>
<td>Matured</td>
<td>fairly good</td>
<td>Destruction</td>
</tr>
<tr>
<td>14</td>
<td>Plantain</td>
<td>Half grown (Acre)</td>
<td>fairly good</td>
<td>Destruction</td>
</tr>
</tbody>
</table>
6.2 Affected Infrastructure of Institutions and Utility Service Providers

The major institutions and utility service providers to be affected and involved with the GAMA project in lieu of their infrastructure /facilities within the right-of-way (RoW) of the drain include:

- Ghana Highway Authority (GHA), in charge of the N1 highway.
- Ghana Water Company Ltd, has a main transmission line running across the drain. However, the Engineering consultant has confirmed that this facility will not require any relocation.
- ECG has a wooden electric pole carrying 3-phase wires at the downstream portion of the drain. However, the Engineering Consultant has confirmed that this facility will not require any relocation.
- The Telcos (MTN, Airtel, Vodafone, Tigo, Glo, Comsys, and C-squared) have both copper and fibre optic cable running along the N1 highway. The National Communication Authority (NCA) is providing a common platform for all the affected Telcos to engage the PCU and the Engineering Consultant with regard to arrangements for relocation of the affected cables.

The above institutions have been engaged and provided with information on the project scope, designs/drawings and locations and traffic management plans (to GHA only) to facilitate the relocation of their affected facilities within the RoW to enable construction of the drains to proceed.

6.3 Socio-economic Condition

6.3.1 Major occupation of PAPs

Generally, the occupation or work of the PAPs whose livelihoods may be affected include the following:

- Carpentry and upholstery services;
- Mechanics or vehicle repairers and welders/straightener; and
- Apprentices/shop assistance at the Carpentry and Upholstery shops.

6.3.2 Income Levels of PAPs

The estimated ranges of income levels of the major occupations acquired through consultations with the PAPs are provided in the table below. Most of the affected shops units could not confirm their monthly income with documentation due to the lack of proper book-keeping.

<table>
<thead>
<tr>
<th>No.</th>
<th>Occupation or Job activity</th>
<th>Average Income / GH₵</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Carpentry</td>
<td>1800</td>
<td>Monthly</td>
</tr>
<tr>
<td>2</td>
<td>Mechanics/Vehicle repairer</td>
<td>2000</td>
<td>Monthly</td>
</tr>
<tr>
<td>3</td>
<td>Welder</td>
<td>2000</td>
<td>Monthly</td>
</tr>
<tr>
<td>4</td>
<td>Upholstery service</td>
<td>2500</td>
<td>Monthly</td>
</tr>
<tr>
<td>5</td>
<td>Apprentice/shop assistance at carpentry shop</td>
<td>60</td>
<td>Weekly</td>
</tr>
<tr>
<td>6</td>
<td>Apprentice/shop assistance at Upholstery shop</td>
<td>250</td>
<td>Weekly</td>
</tr>
</tbody>
</table>
7.0 ELIGIBILITY AND ENTITLEMENTS

7.1 Eligibility Criteria

According to the Resettlement Policy Framework (RPF) for the GAMA Sanitation & Water Projects, any person who suffers loss of or damage to an asset or loss of access to productive resources, as a result of the implementation of Sanitation and Water Project will be considered eligible for compensation and/or resettlement assistance, provided the damage or loss is induced by the project and satisfies the conditions of the cut-off date. This is consistent with the laws of Ghana and the World Bank Policy. For instance, provisions under paragraph 15 of the World Bank’s Operational Policy 4.12 suggest the following three criteria for eligibility under the GAMA Project:

- Those who have formal legal rights to land (including customary and traditional rights recognized under the laws of the country);
- Those who do not have formal legal rights to land at the time the census begins but have a claim to such land or assets – provided that such claims are recognized under the laws of the country or become recognized through a process identified in the resettlement plan; and
- Those who have no recognizable legal rights or claim to the land they are occupying.

7.2 Matrix of Entitlements

Table 7-1 presents the matrix of entitlements for the different categories of impacts to be encountered under the Project.

<table>
<thead>
<tr>
<th>Affected Assets/units</th>
<th>Type of impact</th>
<th>Entitled units</th>
<th>Eligibility criteria</th>
<th>Entitlement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Crops</td>
<td>Destruction of standing crops</td>
<td>Owner of crop</td>
<td>Have grown the affected crop/economic plants (regardless of related plot ownership)</td>
<td>1. Cash compensation for standing crops not harvested prior to land entry, counted at cut-off date and negotiated based on realistic crop rates 2. Disturbance allowance (10%)</td>
</tr>
<tr>
<td>Structures</td>
<td>Destruction of immovable structures; Temporary relocation of</td>
<td>Owner</td>
<td>Use the affected structure</td>
<td>1. Compensation at full replacement value of structure 2. Disturbance allowance (10%) where appropriate.</td>
</tr>
</tbody>
</table>

---

Table 7-1: Matrix of Entitlements for the Impacts
<table>
<thead>
<tr>
<th>Livelihoods</th>
<th>Business /Commercial activity</th>
<th>Owner/ user of structure for business purposes</th>
<th>Use affected structure for business purposes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>1. Cash compensation for temporary loss of income incurred as a result of the demolition or removal of the structure</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2. Disturbance allowance (10%)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Interruption of business due to project activity leading to loss of income</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2. Disturbance allowance (10%)</td>
</tr>
</tbody>
</table>
8.0 VULNERABLE GROUPS/PERSONS

8.1 Identification of vulnerable groups/farmers

Vulnerable groups are those project-affected persons at risk of becoming more vulnerable due to the relocation/displacement and compensation process. Vulnerable people include:

- disabled persons/physically challenged, whether mentally or physically;
- the elderly - above 75 years and feeble/frail;
- widows, who regard themselves as poor;
- children – below 18 years; and
- independent female heads of households/families who consider themselves as poor.

8.2 Assistance to Vulnerable Persons

Members of vulnerable groups may require special or supplementary assistance because they are less able to cope with the physical and/or economic displacement than the affected population in general. Assistance to vulnerable people may take the following forms, depending upon vulnerable persons’ requests and needs:

- Assistance in the compensation payment procedure (e.g. going to the bank with the person to cash the compensation check);
- Assistance in the post payment period to secure the compensation money and reduce risks of misuse/robbery;
- Reinstatement of damaged properties to be carried out by the contractor to take the burden of such work off the affected vulnerable person;
- Assistance in moving: providing vehicle, driver and assistance at the moving stage; and
- Health care if required at critical periods: moving and transition period.

8.3 Identification of vulnerable persons during the inventory

There was no project-affected person that is a child (i.e. below 18 years), or elderly above 75 years or physically challenged according to the age data provided by the affected persons during the survey. There were no female household heads or widows recorded.

The GSMA ARAP Management Teams will continue to look out for or identify vulnerable PAPs since vulnerability is a condition and any PAP could become vulnerable based upon the criteria given above especially with regard to disability.
9.0 VALUATION OF ASSETS AND COMPENSATION MEASURES

The purpose of this valuation exercise is to assess the Total Compensation Payable as part of the Assessment of Resettlement Issues under the GAMA Project. The scope of the valuation covers all structures and crops/economic trees within the project sites. Disruptions to businesses/livelihoods was considered as far as it may be appropriate for payment of compensation for the period of disruption of business/livelihood.

9.1 Basis of Valuation and Compensation Description

The bases of this valuation are derived from the World Bank’s Involuntary Resettlement Policy, OP 4.12; Section 4(1) of the State Lands Act, Act 125; the Resettlement Policy Framework prepared for the GAMA Project in February 2013; and Section 20 of the 1992 Fourth Republican Constitution of Ghana.

In this context, the compensation is the amount required, so far as money can do so, to put the owner or user of a land or building in the same position as if his/her use and enjoyment has not been disrupted. In other words, it is based on the principle of “Full Replacement Cost or Equivalent Reinstatement”.

The Compensation due comprises in general, the cost of repair or replacement, disturbance to the owner/user of the land and/or building and in cases of commercial usage, an amount representing loss of livelihood or income for the period of the disruption.

9.2 Valuation Method and Rates

Land
No land will be acquired for the road culvert/drain construction at Mallam Junction. The land required for the project is a right-of-way or buffer zone requirement for the drains/streams.

Structures/utility service lines
The full Replacement Cost Approach (RCA) was adopted for the valuation of affected structures and relocation of utility service lines. The full RCA is based on the assumption that cost and value are related. It involves finding the estimate of the gross replacement cost of a structure, which is the estimated cost of constructing a substitute structure, having the same gross area as that existing, at prices current at the relevant date. For the purpose of the valuation, the structures and development are not depreciated. The full relocation cost involves the cost required by the utility service provider to relocate its affected service lines before and after construction.

Crops
The Enumeration Approach was adopted for the crops affected by the project. The Enumeration Approach involves taking census of the affected crops and applying a realistic crop rate. The counting is
by the number of trees/plants for the farm size/area. The official Land valuation Division crop rates available is of 2014. The Land Valuation Division does not disclose the methods used to calculate crop rates and is kept confidential.

However, realistic valuation rate for affected crops was derived by applying appropriate inflationary, labour and production cost factors to the prevailing 2014 LVD rates to ensure that the rates are in harmony with the full replacement cost/value requirements of the World Bank standards. Annex 1 shows 2014 LVD rates for some crops.

9.3 Disturbance Allowance

In addition to the value of the affected property/crop as assessed using the full replacement value principle, a disturbance allowance of 10% of the assessed property was applied as per the entitlement matrix to affected persons where appropriate. The disturbance allowance is not applicable to affected institutions and organisations.

Cost of disturbance is one of the components to be considered when determining compensation for PAPs as provided in the State Lands Act 1962. However, the LVD does not provide specific breakdown or constituents for the various components of the LVD rates or values for public consumption. As a result, the consultant used experience from the Ghana Urban Water Project (2006 to 2010), which was financed by the World Bank, where 10% was generally agreed upon by stakeholders and included in the RPF and applied during the preparation of the ARAPs and RAPs.

9.4 Livelihood Assistance/Loss of Income

The estimation for loss of income (referred to as livelihood assistance) for affected commercial structures or business units is generally based on the following factors:
• estimated income or daily sales of the units; and
• estimated period of construction which will disrupt business or commercial activity.

The livelihood assistance/loss of income was determined from experience gathered from preparation of previous RAP/ARAP for the Ghana Urban Water Project from 2006 to 2010 as well as the verbal information received from PAPs with regard to their income levels. Accordingly, the following criteria for loss of income guided the process:
• Minor loss of income, 20% of income as compensation
• Moderate loss of income, 40% of income as compensation
• Major loss of income, 80% of income as compensation.

Generally, loss of income under the Mallam Junction drain project is either moderate or major. Moderate loss of income may occur for businesses (e.g. Mechanic shop) that will be interrupted but may not experience temporary closure or have their structures demolished. Major loss of income will occur
for businesses that will experience temporary closure or have their structures demolished (e.g. the carpentry and upholstery shops).

9.5 Valuation Opinion

Having taken cognisance of the relevant value indicators like type of property, the extent and effect of impact, economic and institutional factors, amongst others, and having adopted the Market Value/ Full Replacement Cost Approach, the total Compensation for the affected properties and businesses for the Mallam Junction Drain Construction under the GAMA Drain and Culverts Project is estimated at **Two Hundred and Seventeen Thousand, One Hundred and Eighty-Nine Cedis and Thirty-Three Pesewas (Gh¢217,189.33)** as at the cut of date of February 8, 2017. The total reinstatement cost component is Gh¢200,101.60, whiles the amount that has to be paid directly to the PAPs is Gh¢17,087.73.

Annex 2 provides the certificate of value.

9.6 Compensation Payment Procedures

Cash compensation will be paid for loss of standing crops, disruption of business/loss of income and demolishing of certain structures. Where feasible the contractor will reinstate in cases of demolishing of certain structures/properties (e.g. culverts, fence walls, concrete pavements), otherwise cash compensation will be paid. Compensation will be paid prior to the affected person vacating the site/land or property.

Each eligible affected person will sign a compensation claim form (as shown in Annex 3) together with the authorized project representative. The compensation claim form clarifies mutual commitments as follows:

- On the project side: commitment to pay the agreed compensation, including all its components (disturbance, livelihood assistance);
- On the affected person’s side: commitment to vacate the site/land by the agreed date.

9.7 Compensation Disbursement Team and Mandate

The Compensation Disbursement Team will include:

- GAMA Project Coordinator at the Municipal Assembly;
- A representative of the GAMA PCU/MSWR;
- Municipal Finance Officer and
- A representative of the Ministry of Finance.

The compensation disbursement team will be responsible for the payment of compensation to project affected persons in line with the valuation report. The team will ensure that all PAPs identified in the valuation report are paid their full compensation due them.
9.8 Cost for Compensation Disbursement Team Activities

A lump sum of Ghc700 has been estimated for the activities of the Compensation disbursement team. The team can use one or two days for compensation disbursement to affected individuals.
10.0 CONSULTATIONS AND DISCLOSURE

10.1 Consultations with Affected Persons and key institutions

The main objective of the stakeholder engagement is to discuss and provide relevant information on the proposed GAMA drains/culvert construction in Ga South Municipality and it specifically seeks to achieve the following objectives:

- To provide information about the proposed project/scope of works to stakeholders;
- To educate stakeholders and affected persons on the need for the proposed project;
- To provide opportunities to stakeholders and affected persons to discuss their opinions and concerns;
- To manage expectations and misconceptions regarding the project;
- To discuss the significance of the initial environmental and social impacts identified and anticipated;
- To discuss the ARAP/compensation principles and processes; and
- To inform the process of developing the ARAP management teams.

10.2 Stakeholder Identification

The stakeholder identification was based on issues related to the project scope of works and the geopolitical and traditional setting of the project as well as project area of influence. The main considerations in the stakeholder group selection process were:

- Relevant regulatory institutions;
- Relevant local government authorities;
- Project affected groups/communities/people; and
- Government agencies which may be involved or have direct interest (e.g. road/utility agencies).

The consultations with project affected persons and other stakeholders identified issues of concern, which will be taken into consideration during the implementation of the resettlement related issues are summarized in the Table below.

10.2.1 Matrix of Key Concerns from PAPs/Nearby shop owners and Responses where applicable

<table>
<thead>
<tr>
<th>No.</th>
<th>Concerns/Comments from PAP</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>The Manager of the Total Fuel Station, where the new drain diversion passes, has indicated that he will resume operation after completion of the drain. The station was closed down due to the June 3, 2015 Flood and Fire Disaster that occurred in Accra.</td>
<td>-</td>
</tr>
<tr>
<td>2</td>
<td>Management of traffic on the highway is key to minimize undue traffic congestion on this busy highway during construction and cutting across the road.</td>
<td>The Contractor is expected to prepare and implement a Traffic Management Plan (TMP) to address traffic issues. The TMP will be reviewed and approved by</td>
</tr>
<tr>
<td>No.</td>
<td>Concerns/Comments from PAP</td>
<td>Responses</td>
</tr>
<tr>
<td>-----</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>3</td>
<td>Nearby carpentry/upholstery shops and mechanics operating within a residential facility expressed concern of the likely lose of income and inability to operate during the construction of the drain especially when the southern section of the N1 highway is blocked.</td>
<td>Appropriate compensation with loss of income will be computed and paid. The loss of income computation will take into consideration whether your operations will be disturbed/interrupted or have to be temporary closed down.</td>
</tr>
<tr>
<td>4</td>
<td>A resident by name Mr. D.O.O indicated that part of the fence wall of his property was destroyed during the desilting of the drain by the local government authority after the June 3, 2015 disaster but the fence wall was not reinstated. He expects the fence wall to be affected under the GAMA Project to be reinstated together with the previous damaged sections.</td>
<td>The affected sections of the fence wall including the previously damaged sections will be reinstated by the contractor.</td>
</tr>
<tr>
<td>5</td>
<td>The PAPs have selected Mr. D.O.O to represent them on the Grievance Redress Committee.</td>
<td>-</td>
</tr>
<tr>
<td>6</td>
<td>The owner of a pharmacy near the drain recommends that the drain should be constructed to extend to about 60m from the edge of the road/N1 to minimize erosion near the pharmacy building.</td>
<td>Recommendation noted. It is a good suggestion. It appears the designs have made provision for extension beyond the edge of the N1 to minimise erosion issues.</td>
</tr>
<tr>
<td>7</td>
<td>The contractor will require permission from the Ghana Highways Authority (GHA) and the National Security before the road is cut for the drain construction according to the PCU and the contractor.</td>
<td>-</td>
</tr>
<tr>
<td>8</td>
<td>A provisional sum of Ghc80,000 for reinstatement was captured in the BoQ according to the Engineering/Supervising consultant.</td>
<td>The GHA will recommend a road contractor for the reinstatement of the affected sections of the road and they must approve any reinstatement cost determined by the PCU or the Engineering Consultant.</td>
</tr>
<tr>
<td>9</td>
<td>The GHA has confirmed reviewing and submitting comments on the Traffic Management Plan to the PCU to address for the Mallam Junction drain construction. The GHA confirmed that they must be involved with the traffic management during the cutting of the road.</td>
<td>-</td>
</tr>
</tbody>
</table>
| 10  | **GWCL, Accra West**  
The client should furnish GWCL with the design drawings, contractor’s work method statements and work plan. This will enable GWCL assess the level of impact to be expected | The PCU will arrange for a site visit involving all utility companies and Telcos and the Engineering Consultant to help with the field assessment.                                                             |
<table>
<thead>
<tr>
<th>No.</th>
<th>Concerns/Comments from PAP</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>The Accra West Regional Distribution Manager of GWCL Manager fears that its main transmission line will be affected by the project and if so, the project will have to bear the cost of relocation of the transmission line.</td>
<td>The Engineering Consultant has confirmed that the GWCL line will not be affected.</td>
</tr>
<tr>
<td>12</td>
<td>The Accra West ECG Project Engineer fears that the electricity pole carrying 3-phase lines may be affected and will require relocation.</td>
<td>The Engineering Consultant has confirmed that the pole will not be affected.</td>
</tr>
</tbody>
</table>
| 13  | PAPs on Quality of reinstatement works  
How do we guarantee the quality of reinstatement works by the contractor according to the PAPs? | The Contractor will be supervised by an Engineering Consultant. Secondly, there is a monitoring and evaluation team as part of the ARAP implementation structure at the Assembly to monitor reinstatement of affected properties by the contractor. |
| 14  | When will the contractor resume construction work? They suggested that local community meetings and the media should be used to inform the people about commencement of work and the work schedule. | Suggestion well noted. Local community meetings and the media will be used to inform the people about commencement of work and the contractor work schedule. However, the Environmental consultant will have to prepare the ESMP and ARAP and compensation paid to affected people before resumption of work by contractor. |
| 15  | Utility/Telecom Companies  
There are visible/surface as well as underground pipes/cables and poles belonging to GWCL, ECG and the Telecommunication Operators including MTN, Airtel, Tigo, Glo, Vodafone, C-squared and Comsys, along the affected N1 road section at Mallam Junction. The National Communication Authority is serving as the link for the affected Telecommunication companies (Telcos) to engage the PCU and the Engineering Consultant.  
The NCA in collaboration with the PCU and the Engineering consultant organized two meetings and field visits for the Telcos to the project sites and have agreed on measures to ensure smooth relocation and reinstatement of cables within the RoW. | - |
The Telcos have agreed to collaborate with the Contractor and the Engineering Consultant for the temporary relocation of the cables prior to construction and final reinstatement during construction.

At a meeting at the National Communication Authority on 29th March, 2017, it was agreed that:

- The contractor will carry out all the civil works required for the temporary relocation of the telecom cables and the reinstatement work required for the re-laying of the cables after cutting through the N1.
- The contractor will make provision for about eight wooden poles (4 poles for the northern section, 2 poles for the southern section and 2 poles as standby) with cross arms and install these poles at suitable locations behind the active construction site to enable the Telcos to relocate the cables within the RoW.
- The Telcos will provide additional materials including cables if necessary required to facilitate the relocation of the affected cables.
- The Engineering Consultant will notify the Telcos through the NCA with the work schedule so that the telcos can be informed accordingly and be present at the work site to provide guidance to the contractor for the relocation of the cables.
- If required, the contractor will provide two concrete columns near the GWCL transmission line for the affected Telcos to use.

<table>
<thead>
<tr>
<th>No.</th>
<th>Concerns/Comments from PAP</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>16</td>
<td>Telcos</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Will the GWCL transmission line the ECG pole be affected. The GWCL line is close to some telecom lines.</td>
<td>The Supervising Engineer confirmed that the GWCL transmission line and the ECG pole/line will not be affected. This will prevent the contractor damaging any of such underground service lines.</td>
</tr>
</tbody>
</table>
10.2.2 Consultations with the contractor and Engineering Consultant

The contractor is using one of the buildings of the Total Fuel Station for storage of some construction materials such as cement. No work-camp has been constructed. The major concern of the contractor is the various utility cables along the N1 road that will require relocation before cutting across the highway.

The Engineering Consultant has confirmed that the GWCL line as well as the ECG high tension pole will not be affected and will not require any relocation. He indicated that the drain will be constructed below the water line. The Engineering Consultant also confirmed that letters with the necessary documents (i.e. Traffic Management Plan) seeking approvals from the Ghana Highway Authority and the National Security have been sent through the PCU.

Below is evidence of consultation:

Meeting at NCA office with Telcos on 29/03/2017
Meeting at NCA office with Telcos on 22/03/2017

Site Visits with Telcos – Mallam Junction (upstream) on 24/03/2017
Site Visits with Telcos – Mallam Junction (downstream) on 24/03/2017

Field Picture 6: GWCL Line and Possible communication lines
Meeting with GHA Director of Road Safety and Environment

Meeting with GWCL Accra West Region Distribution Manager of GWCL
10.3 Disclosure

10.3.1 What has been done

Disclosure of RPF
A Resettlement Policy Framework (RPF) was prepared for the GAMA Projects in February 2013 and it was approved by the World Bank and disclosed as part of the World Bank requirements at the World Bank Infoshop.

Information on cut-off dates
The PAPs have been directly informed and are aware about the project and the cut-off date. This was done during the valuation of the affected properties on 8th February, 2017. This is to ensure that no new construction or improvements are made on the affected property and also no new entrants are allowed on the site for compensation purposes after the final field valuation on 8th February, 2017.

Other Relevant information to PAPs
The PAPs have been informed about the valuation methods, measures for loss of income if applicable to their circumstances, and grievance redress issues. The PAPs have been informed that compensation due them will be paid before their properties are destroyed and or before the contractor resumes work. The PAPs have also been informed about the formation of a Grievance Redress Committee at the GSMA and the avenues available to them to ensure that their grievances are addressed. The PAPs have selected a representative (Mr. D.O.O) to serve as a member of the Grievance Redress Committee.

Disclosure of compensation payable and Grievance Redress Chapter of the ARAP to PAPs
As part of the in-country disclosure process, the Consultant has disclosed the compensation payable and the Grievance Redress Chapter of the ARAP to the PAPs. A copy each of the PAPs compensation profile and the Grievance Redress Chapter of the ARAP was handed out to the PAP and the necessary explanation and clarification provided to the PAPs and comments from the PAPs noted on the signed-off sheet where necessary. The PAPs signed off for having agreed to the compensation figures and received these relevant documents. Each PAP was informed about the actual cash compensation amount to be paid to him or her and the reinstatement component to be carried out by the contractor. Section 10.2.2 provides evidence of disclosure to PAPs as well as a matrix of PAPs concerns and responses from the consultant.

10.3.2 What needs to be done

ARAP Disclosure
The World Bank (WB) requires that the ARAP be submitted for public disclosure purposes. The disclosure will take the form of in-country as well as infoshop disclosures.

**In-country Disclosure Process**
The PCU will submit copies of the ARAP to the GAMA Project Task Team Leader (TTL) at the World Bank for clearance. The PCU will then ensure that copies of the cleared ARAP or extracts of the cleared ARAP (core report without the valuation report and compensation profile of PAPs) are sent to the GSMA to enable the PAPs, and other stakeholders such as Assemblymen/women and NGOs access the document. A public notice of the ARAP disclosure will be placed at the Assembly premises, and newspaper publications will also made to inform the public/PAPs about the documents at the Assembly.

**Duration of in-country Disclosure**
In view of the fact that the impacts are considered to be of relatively low magnitude and the compensations appear straightforward, a maximum of 7 days (from date of public notification) would be allowed for receipt of public comments from the in-country disclosure.

**Public response to in-country Disclosure**
The PCU will collate feedback from the in-country disclosure if any and relay them to the Consultant to be incorporated into the ARAP.

**Infoshop Disclosure**
Copies of the Final ARAP will be submitted in electronic form to the GAMA Project TTL at the World Bank for disclosure at the Bank’s infoshop.
11.0 GRIEVANCE REDRESS PROCESS

Grievance redress mechanism (GRM) is the institutions, instruments, methods, and processes by which a resolution to a grievance is sought and provided. The consultations of project affected persons and other key stakeholders will ensure that their concerns are taken care of during project implementation and would help minimize disputes or conflicts arising from implementation of any project activity. Nevertheless, avenues have been created for project affected persons to express a grievance against any resettlement or compensation related issue or procedures, or directly against improper construction activities.

11.1 Objective and Purpose of the Grievance Redress Mechanism

The objective or purpose of the Grievance Redress Procedure is to address and resolve grievances or complaints from affected persons promptly, fairly, and in a manner that is, to the extent possible, acceptable to all parties. It is intended to use alternative ways to resolve complaints/disputes/conflicts arising out of the implementation of the ARAP in an amicable way and to avoid or minimise litigation.

11.2 Potential grievances/disputes

In practice, grievances and disputes that arise during the course of implementation of a resettlement/compensation program may be related to the following issues:

- Mistakes in inventorying or valuing properties;
- Disagreement on property boundaries, either between the affected person and the expropriation agency or between two neighbours;
- Disputed ownership of a given asset (two or more affected people claim that the affected asset is theirs);
- Disagreement on asset valuation methods;
- Successions, divorces, and other family issues resulting in disputed ownership or disputed shares between inheritors or family members; and
- Disagreement with the computation of the loss of income or relocation/resettlement assistance or transportation cost.
- Excesses of the contractor with regard to demolition or relocation of affected properties/structures or blockage of access to business facilities or residences.

11.3 Redress Mechanism

The general steps of the grievance process comprise:

- Registration of complaints;
- Determining and implementing the redress action;
- Verifying the redress action; and
Monitoring and Evaluation.

Registration of complaints
Complaints can be lodged verbally or in writing or phone call to the GAMA Project Coordinator at the Municipal Assembly. The elected local Assemblyman for the area can also receive complaints from PAPs (because the Assemblyman lives within the community and may be closer to the PAPs and some PAPs prefer to route their complaints through the Assemblyman and avoid undue transport and time cost to the Assembly) and ensure that such complaints reach the GAMA Project Coordinator at the Assembly. The GAMA Project Coordinator shall receive all complaints and shall officially log these complaints in a dedicated log book for that purpose. The GAMA Project Coordinator will inform the team leader for the grievance redress committee within 24 hours on any complaint lodged. A sample grievance redress form to guide the logging and resolution of complaints is provided in Annex 4.

Determining and implementing the redress action
When a grievance/dispute is recorded as per above-mentioned registration procedures, the grievance redress team will be called into action, and mediation meetings will be organized with interested parties. Minutes of meetings will be recorded.

The grievance redress team will determine the redress action in consultation with the complainant if necessary. Otherwise, the grievance redress team will communicate to the complainant on the acknowledgement of the grievance, the redress action proposed and the timeframe for implementation. The proposed redress action and the timeframe in which it is to be implemented will be discussed within 3 working days of receipt of the grievance. The grievance issue will be resolved within 5 working days of receipt of complaints.

Verifying the redress action
The grievance redress team will visit the affected property site or get in touch with the complainant to confirm that the redress action is carried out. If the complainant is not satisfied with the outcome of the redress action, additional steps will be taken to resolve the issue or reach an amicable agreement. Verification will be completed within 7 days of the execution of the redress action.

Monitoring and Evaluation
The Monitoring and Evaluation Team will monitor the activities of the Grievance Redress Team to ensure that complaints and grievances lodged by PAPs are followed-up and resolved amicably as much as possible.

11.4 Membership and Function of Grievance Redress Team/Committee

The Grievance Redress Committee/Team will include the following:
- the Municipal Coordinating Director will chair the Committee;
- the GSMA GAMA Project Coordinator
• the elected local Assemblyman and
• a representative of the PAPs.

In addition to the main function of resolving grievances, disputes, complaints and conflicts, the Grievance Redress Team will:

i. ensure smooth implementation of the ARAP;
ii. establish dialogue with the PAPs; and
iii. ensure that their concerns and suggestions are incorporated and implemented during the construction phase.

11.5 Additional Steps and Court of Law

If the complainant is not satisfied with the decision of the grievance redress team, he/she can bring it to the attention of the Chief Director at the Ministry of Sanitation and Water Resources, or the GAMA PCU Coordinator will draw the attention of the Chief Director at the MSWR about the unresolved grievance. The Chief Director at the Ministry will mediate on the issue within 5 days from the date of receipt of such a decision by the Ministry. If such a time line is not possible, the Chief Director should inform the PCU accordingly giving reasons and possible new date.

If the complainant remains dissatisfied with the mediation effort of the Ministry, the complainant has the option to pursue appropriate recourse via judicial process in Ghana. The Constitution allows any aggrieved person the right of access to Court of law. However, noting that court cases can be cumbersome and time consuming, all effort must be made to reach amicable settlement with the affected person(s).

11.6 Cost for Grievance Redress Activities

A lump sum of Ghc2000 has been estimated to take care of the activities of the Grievance Redress Team. The line items involved in this cost are mainly transport allowance for the PAP representative to attend meetings at the Assembly, fuel for field verifications by the team and lunch for members for extended meeting hours and during field verifications.
12.0 ARAP IMPLEMENTATION PLAN

The ARAP Implementation Plan identifies the relevant institutions involved with the implementation of the ARAP, their roles and responsibilities and provides for indicative timelines for implementation of the ARAP.

12.1 Institutional Arrangement

The main institutions concerned with the implementation of the GAMA Project as well as the resettlement/compensation related activities including reinstatement works are provided in Table 12-1. The ARAP implementation activities will be under the overall guidance of the office of the Project Coordination Unit (PCU) of GAMA. Figure 12-1 shows the Safeguard Management Structure put in place to ensure that safeguard issues are addressed during the construction phase, and Figure 12-2 shows the ARAP Implementation Structure.

<table>
<thead>
<tr>
<th>No.</th>
<th>Institution</th>
<th>Role/Responsibility Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Ministry of Sanitation and Water Resources (MSWR)</td>
<td>The Ministry hosting and responsible for the implementation of the GAMA Projects in general and acts on behalf of the Government of Ghana in all aspects of the GAMA Projects.</td>
</tr>
<tr>
<td>2</td>
<td>Ministry of Finance and Economic Planning</td>
<td>The Ministry responsible to provide funds for compensation payments to PAPs on behalf of the Government of Ghana, and will contribute a representative to the compensation disbursement team at the Municipal/Metropolitan Assembly level.</td>
</tr>
<tr>
<td>3</td>
<td>Lands Commission (Land Valuation Division)</td>
<td>Will be invited to review and confirm value of affected properties and confirmation of land/property boundaries when the need arises especially during disputes or grievance redress issues concerning project affected persons. The Grievance Redress Team should invite the Lands Commission as expert to assist in resolving disputes requiring the expertise of the Commission.</td>
</tr>
<tr>
<td>4</td>
<td>Project Coordination Unit (PCU)</td>
<td>The PCU is responsible for the successful implementation of the GAMA Projects by engaging appropriate contractors and consultants for the execution of the projects. Will have oversight responsibility for the ARAP implementation. The PCU has a Safeguard Specialist who is responsible of ensuring that safeguard issues and documentations are taken care of in all the GAMA Projects. The MSWR/PCU will officially communicate with the National Security in writing requesting for permission to cut the N1 highway for the construction of the Mallam Junction drain to proceed. The PCU has</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>5</td>
<td>Ga South Municipal Assembly</td>
<td>officially engaged the GWCL/ECG/ Telcos/National Communication Authority by providing information on the project scope and drawings to these utility service providers and notifying them to relocate their service lines at the Mallam Junction for construction works to proceed.</td>
</tr>
<tr>
<td>6</td>
<td>Ghana Highway Authority (GHA), Head office</td>
<td>This is the beneficiary local government authority where the project is being implemented. Will be directly involved with the ARAP implementation and will have representations in the three ARAP Management Teams, namely Compensation Disbursement Team, Grievance Redress Team, and Monitoring and Evaluation Team. The Assemblies also have a Safeguard Focal Person to ensure that safeguard issues are addressed during construction.</td>
</tr>
<tr>
<td>7</td>
<td>National Security</td>
<td>The GHA is in charge of the N1 highway. The Authority will approve the Traffic Management Plan (TMP) for the crossing of the N1 highway and be involved with the actual traffic management during the crossing and reinstatement of the damaged sections of the highway. The authority has received and provided comments on the TMP for the N1 to PCU to address and submit for approval. The authority will be involved with the process of reinstatement by first recommending an approved road contractor for the reinstatement; secondly approve the reinstatement cost or estimates captured in the BoQ; and thirdly provide supervision and monitoring of affected sections of the highway during reinstatement. The GHA will not bear the cost of reinstatement.</td>
</tr>
<tr>
<td>8</td>
<td>Telcos/National Communication Authority</td>
<td>The National Security will have to grant permission to the MSWR/PCU before the contractor can cut the N1 highway. The MSWR/PCU will have to officially communicate with the National Security in writing requesting for such a permission.</td>
</tr>
<tr>
<td>9</td>
<td>Engineering/Supervising Consultant for the Drains/Culvert Projects</td>
<td>The Telcos will facilitate the relocation of their service lines at the project site. The MSWR/PCU have officially engage these telcos in the presence of the NCA by providing information on the project scope, designs/drawings and locations and carrying out field visits to facilitate the relocation of their service lines at the Mallam Junction.</td>
</tr>
<tr>
<td>10</td>
<td>ARAP Management Teams</td>
<td>The Engineering Consultant, Weruw Consulting Engineering, engaged by the PCU to supervise the work of the contractors responsible for the construction of the drains/culverts. The consultant will have a representation in the ARAP Management Teams, i.e. Monitoring and Evaluation Team.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>The ARAP Management Teams will be directly responsible for the implementation of the ARAP. The teams to be set up in each beneficiary Municipal/Metropolitan Assembly include:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Compensation Disbursement Team – responsible for payment of</td>
</tr>
</tbody>
</table>
compensation to PAPs where appropriate

- Grievance Redress Team – responsible for registering and addressing disputes/complaints
- Monitoring and Evaluation Team – responsible for monitoring the successful implementation of the ARAP

<table>
<thead>
<tr>
<th>No.</th>
<th>Role</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>Project Contractor</td>
<td>The contractor(s) engaged by the PCU for the construction of the drains and culverts. The contractor(s) will be responsible for reinstatement works. That is, the contractor(s) shall be mandated to reinstate affected properties for which cash or direct compensation was not made to the PAP. Example, if fence walls or concrete pavements are affected, the contractor will be required to reinstate such properties.</td>
</tr>
</tbody>
</table>
Figure 12-1: Safeguard Management Structure for Project Implementation

Figure 12-2: ARAP Implementation Structure
### 12.2 Implementation Programme and Timetable

The table below shows the general implementation programme for the various tasks identified under the resettlement/compensation related programme.

**Table 12-2: Implementation Programme and Timetable**

<table>
<thead>
<tr>
<th>Main tasks</th>
<th>Specific tasks</th>
<th>Responsibility</th>
<th>Timelines</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Preparation Stage</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Initial notification of PAPs about the Project in line with Ghanaian laws</td>
<td>Notify PAPs about the project</td>
<td>MMDAs and Contractor</td>
<td>September/ October 2016</td>
<td>Completed</td>
</tr>
<tr>
<td>Site Inspections to identify resettlement related issues</td>
<td>Field visits and trekking around project sites</td>
<td>SAL Consult Ltd</td>
<td>November 3, 2016 and February 2 and 3, 2017</td>
<td>Completed</td>
</tr>
<tr>
<td>Consultations with PAPs and other Stakeholders on resettlement and compensation issues</td>
<td>Organise one to one meetings with stakeholders</td>
<td>SAL Consult Ltd</td>
<td>November 2016 to March 2017</td>
<td>Ongoing</td>
</tr>
<tr>
<td>Literature review, inventory of affected persons and properties and valuation of properties</td>
<td>Review of relevant documents</td>
<td>SAL Consult</td>
<td>November 2016 to February 2017</td>
<td>Completed</td>
</tr>
<tr>
<td></td>
<td>Census/Socio-economic survey of affected persons</td>
<td>SAL Consult</td>
<td>February 2017</td>
<td>Completed</td>
</tr>
<tr>
<td></td>
<td>Field valuation of properties</td>
<td>SAL Consult</td>
<td>February 2017</td>
<td>Completed</td>
</tr>
<tr>
<td>Preparation of draft Report</td>
<td>Prepare a draft ARAP in line with the ToR for the assignment</td>
<td>SAL Consult</td>
<td>April 2017</td>
<td>Completed</td>
</tr>
<tr>
<td>Finalization of Report</td>
<td>Review of draft ARAP</td>
<td>PCU and World Bank</td>
<td>May-June 2017</td>
<td>Completed</td>
</tr>
<tr>
<td></td>
<td>Final draft ARAP preparation and disclosure of compensation figures to PAPs</td>
<td>SAL Consult</td>
<td>1st week of July, 2017</td>
<td>Completed</td>
</tr>
<tr>
<td></td>
<td>In-country disclose of final ARAP at GSMA</td>
<td>PCU/GSMA</td>
<td>3rd week of July, 2017</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Revision of final draft ARAP with public comments if any</td>
<td>SAL Consult</td>
<td>4th Week of July, 2017</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Infoshop Disclosure of final ARAP</td>
<td>World Bank</td>
<td>4th week of July, 2017</td>
<td></td>
</tr>
<tr>
<td>Implementation Stage</td>
<td>Task Description</td>
<td>Responsible Parties</td>
<td>Timeframe</td>
<td></td>
</tr>
<tr>
<td>-------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------</td>
<td>-------------------------------</td>
<td></td>
</tr>
<tr>
<td><strong>Inauguration of ARAP Management Teams or Committees</strong></td>
<td>Compensate affected persons as appropriate.</td>
<td>PCU/GSMA</td>
<td>1st week of August 2017</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Grievance Redress Team</strong></td>
<td></td>
<td>PCU/GSMA</td>
<td>1st week of August 2017</td>
<td></td>
</tr>
<tr>
<td><strong>Monitoring and Evaluation Team</strong></td>
<td></td>
<td>PCU/GSMA</td>
<td>1st week of August 2017</td>
<td></td>
</tr>
<tr>
<td><strong>Compensation payment</strong></td>
<td>Pay compensation to affected persons as appropriate.</td>
<td>PCU and Compensation Disbursement team</td>
<td>2nd week of August 2017</td>
<td></td>
</tr>
<tr>
<td><strong>Relocation of Telcos service lines</strong></td>
<td>Contractor to assist Telcos to relocate their cables along sections of the drain.</td>
<td>MSWR/PCU, Telcos, Engineering Consultant</td>
<td>3rd week of August 2017</td>
<td></td>
</tr>
<tr>
<td><strong>Resumption of construction activities</strong></td>
<td>Contractors to resume construction activities at the various project sites</td>
<td>Contractors/Supervising Consultant</td>
<td>3rd week of August 2017</td>
<td></td>
</tr>
<tr>
<td><strong>Reinstatement works</strong></td>
<td>Reinstall affected properties where appropriate during construction</td>
<td>Contractor/Supervising Consultant</td>
<td>Project duration</td>
<td></td>
</tr>
<tr>
<td><strong>Grievance Redress</strong></td>
<td>Resolution of all disputes/complaints</td>
<td>Grievance Redress Team</td>
<td>2nd week of August to end of Project</td>
<td></td>
</tr>
<tr>
<td><strong>Monitoring and Evaluation</strong></td>
<td>Monitor implementation of resettlement/compensation related and reinstatement works</td>
<td>Monitoring and Evaluation Team</td>
<td>Project duration</td>
<td></td>
</tr>
<tr>
<td><strong>ARAP Completion Report</strong></td>
<td>Prepare completion report after payment of direct compensation to affected persons</td>
<td>Compensation Disbursement Team</td>
<td>One week after completing payment of compensation</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Prepare completion report after reinstatement of affected properties</td>
<td>Monitoring and Evaluation Team</td>
<td>One week after contractor has confirmed completion of reinstatement works</td>
<td></td>
</tr>
</tbody>
</table>
13.0 MONITORING AND EVALUATION

The monitoring and evaluation measures put in place are to ensure that the implementation of the resettlement actions is carried out in accordance with the requirements under this ARAP. The monitoring and evaluation will be the main mechanism to alert the PCU of any delays and problems and these activities will help measure the extent to which the main objectives of the ARAP have been achieved.

The ARAP monitoring and evaluation measures will have two components and these include:
- Performance/Internal monitoring; and
- ARAP completion audit or end evaluation.

13.1 Performance/Internal Monitoring

The purpose of the Internal monitoring is to help identify implementation deviations from the ARAP requirements and challenges and provide corrective and redirection measures to ensure that the ARAP requirements are adhered to during ARAP and project implementation periods.

13.1.1 Responsibility and Functions

The monitoring and evaluation team will be responsible for the internal monitoring of the ARAP implementation programme to ensure that the compensation disbursement team, the grievance redress team as well as the contractor follow the schedule and comply with the principles of the ARAP.

The functions of the monitoring and evaluation team is to:
- Ensure that actions and commitments described in this ARAP are being implemented;
- Ensure that eligible people to be affected by the project receive their full compensation;
- Ensure that complaints and grievances lodged by PAPs are followed-up and resolved;
- Ensure that the contractor does not destroy properties beyond or above what has been compensated for or valued for compensation;
- Ensure that reinstatement works are carried out by the contractor as agreed;
- Provide the PCU with feedback on the resettlement/compensation implementation;
- Alert the PCU of any delays or problems associated with the activities of the compensation disbursement team, grievance redress team and the contractor
- Provide completion reports on compensation disbursement and reinstatement works.

13.1.2 Methodology and Procedure

The monitoring and evaluation team will use the following methods and procedures to accomplish its functions:
- Visit the project affected areas periodically so as to interact with the PAPs and gauge the level of community/affected persons’ satisfaction with regard to resettlement/compensation issues;
Participate in the periodic site/project meetings to report on progress of the resettlement/compensation actions and reinstatement works;

- Have meetings with the compensation disbursement and grievance redress teams to assess delays and challenges associated with their activities;

- Review the grievance redress log book/file compiled by the grievance redress team to assess the number of complaints received and progress with their resolution; and

- Document and report on all findings to the PCU.

### 13.1.3 Monitoring Indicators

The monitoring indicators will include but not limited to:

- Amount of compensation or resettlement assistance paid;
- Number of PAPs available and received or signed for the compensation amount;
- Number of Representatives of PAPs who received compensation on behalf of PAPs;
- Date of payment, payee of the compensations and date of resumption of construction activities;
- Construction timelines/duration and any extensions;
- Type of affected property and whether it was fully or partially impacted during the construction period;
- Number of reinstatement works executed;
- Number of grievances registered and number of grievances resolved by the grievance redress team;
- Number of unresolved complaints;
- Frequency of meetings of the grievance redress team; and
- Adherence to procedures by the compensation disbursement and grievance redress teams.

### 13.1.4 Reporting

The monitoring and evaluation team will submit the following reports to the PCU:

- Monthly Progress Report – to provide status of all its activities carried out in the specified month and findings made and recommendations;
- Completion report on compensation disbursement status – to be prepared and submitted one week after the compensation disbursement team has completed payment of compensation;
- Completion report on reinstatement status – to be prepared and submitted one week after the contractor has completed its construction works and before the contractor receives his final payment.

The completion report for reinstatement should be prepared after the contractor has confirmed completion of all reinstatement works. This report should inform the PCU prior to making final payment to the contractor. The contractor will be required to rectify or reinstate any poor reinstatement work identified in the completion report on reinstatement works.
The completion report would draw out the objectives, lessons learnt and any outstanding compensation or reinstatement issues. This is not an evaluation but a status report on the ARAP when implementation has been completed.

### 13.1.5 Membership of the Monitoring and Evaluation Team

The proposed membership of the monitoring and evaluation team will include:
- Municipal Works Engineer will serve as chairperson or Team Leader;
- The elected local Assemblyman;
- Monitoring & Evaluation Specialist at the PCU; and
- Weruw Consulting Engineering, the Supervising Consultant for the Project.

### 13.2 Completion Audit

The World Bank Safeguard Policy, OP 4.12 states that upon completion of the project, the project proponent oversees an assessment to determine whether the objectives of the resettlement instrument have been achieved. Evaluation is intended at checking whether policies have been complied with and providing lessons learnt for amending strategies and implementation in a longer-term perspective.

The completion audit will allow the GAMA-PCU and the GSMA, and other relevant stakeholders to verify that all resettlement measures identified in the ARAP were implemented or otherwise, and that compensation and reinstatement works have been completed in compliance with OP 4.12. The audit will also evaluate that the actions prescribed in the ARAP and implemented had the desired effect.

**Responsibility and Timeframe**

The GAMA-PCU will engage a local consultant or auditor to carry out the completion audit. The completion audit is to be undertaken after completion of all ARAP as well as construction activities including reinstatement works.

### 13.3 ARAP Monitoring & Evaluation Cost

A lump sum of Ghc1300 has been estimated to take care of the activities of the monitoring and evaluation team.
14.0 ESTIMATED COST FOR ARAP IMPLEMENTATION AND FUNDING OF ARAP

14.1 Estimated Cost for ARAP Implementation

The cost estimates for the implementation of the ARAP including direct compensation payments to PAPs, reinstatement works to be carried out by the contractor and budget for the ARAP implementation teams is Gh¢225,533.12. The details are provided in Table 14.1.

<table>
<thead>
<tr>
<th>No.</th>
<th>Item</th>
<th>Estimated Cost/ Gh¢</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Compensation to be directly paid to PAPs</td>
<td>17,087.73</td>
<td>Amount directly going to the PAPs</td>
</tr>
<tr>
<td>2.</td>
<td>Reinstatement cost component</td>
<td>200,101.60</td>
<td>Contractor to carry out reinstatement works prior to making claim. The Ghana Highways Authority will be involved with the reinstatement of the N1 whiles the Telcos will be involved during the temporary relocation of the affected cables and final reinstatement of the cables.</td>
</tr>
<tr>
<td>3.</td>
<td>Subtotal</td>
<td>217,189.33</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td>Budget for ARAP Implementation Teams</td>
<td>4,000.00</td>
<td>(lump sum)</td>
</tr>
<tr>
<td>5.</td>
<td>Contingency (2% of No.3)</td>
<td>4,343.79</td>
<td></td>
</tr>
<tr>
<td>6.</td>
<td>Total for ARAP Implementation</td>
<td>225,533.12</td>
<td>Estimated cost for the implementation of the Mallam Junction Drain construction</td>
</tr>
</tbody>
</table>

14.2 Funding

The Ghana Government through the Ministry of Finance will provide funds for the payment of the direct compensation to project affected persons, which is estimated at Gh¢17,087.73 as well as Gh¢4,000.00 and Gh¢4,343.79 respectively for ARAP Implementation Team activities and Contingencies respectively, as shown in Table 14.1. The estimated reinstatement cost of Gh¢200,101.60 will not be given upfront to the contractor. However, the contractor will be required to reinstate the affected properties and submit claims for payment as appropriate to the PCU as part of its construction work.
ANNEXES

Annex 1  2014 LVD Rates for some crops
Annex 2  Certification of Value
Annex 3  Compensation Claim Form
Annex 4  Grievance Redress Sample Form
### ANNEX 1 2014 LVD RATES FOR SOME CROPS

<table>
<thead>
<tr>
<th>Crops</th>
<th>Seedlings LVD Rate 2014 (GH¢ / Unit)</th>
<th>Quarter Grown LVD Rate 2014 (GH¢ / Unit)</th>
<th>Half Grown LVD Rate 2014 (GH¢ / Unit)</th>
<th>Matured LVD Rate 2014 (GH¢ / Unit)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plantain</td>
<td>2.64</td>
<td>3.96</td>
<td>5.28</td>
<td>6.60</td>
</tr>
<tr>
<td>Pawpaw</td>
<td>0.35</td>
<td>1.29</td>
<td>1.82</td>
<td>2.24</td>
</tr>
<tr>
<td>Mango</td>
<td>3.88</td>
<td>14.35</td>
<td>20.22</td>
<td>24.89</td>
</tr>
<tr>
<td>Orange</td>
<td>3.88</td>
<td>14.35</td>
<td>20.22</td>
<td>24.89</td>
</tr>
</tbody>
</table>
ANNEX 2  CERTIFICATION OF VALUE

This is to certify that we have inspected all the properties described in this Valuation Report under the proposed GAMA Mallam Junction Drains Project in the Ga South Municipality.

The appraisal has been conducted in an objective manner in accordance with the Code of Professional Ethics of the Ghana Institution of Surveyors (GhIS) to which we are affiliated.

To the best of our knowledge and belief, the statements of fact contained in this Valuation Report and upon which opinions herewith are based are true and correct. We declare that we do not have any present or prospective interest in the subject property and have no personal bias with respect to the properties involved.

In our professionally considered opinion, having regard to the legal, physical, economic and institutional factors, the affected properties in the surveyed area have been assigned the following values as at the date of valuation:

<table>
<thead>
<tr>
<th>MALLAM JUNCTION DRAIN CONSTRUCTION UNDER GA SOUTH MUNICIPAL ASSEMBLY (GSMA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Compensation Cost Description</td>
</tr>
<tr>
<td>--------------------------------</td>
</tr>
<tr>
<td>Affected structures/crops and loss of Income</td>
</tr>
</tbody>
</table>

Prepared by:

Surv. Emmanuel Ampiaw  
[Principal Valuer]  
For: Property Appraisal & Investment Consult  
Date: 06 July 2017

In collaboration with

Emmanuel Acquah, MSc  
Principal Consultant/Resettlement Expert  
For: SAL Consult Ltd  
Date: 06 July 2017
ANNEX 3 COMPENSATION CLAIM FORM

CONSTRUCTION OF DRAINS/CULVERTS UNDER THE GAMA PROJECT

-COMPENSATION CLAIM AND COMMITMENT FORM FOR CROPS-

Affected Person Information:

Name of Claimant: ................................................................. Sex: ................. Age: .........................

Name of Authorized Representative: ..........................................................

Current Abode: ...............................................................

Total Compensation Due:

<table>
<thead>
<tr>
<th>Location of Crop</th>
<th>Value of Affected Crop(s) /(Ghc)</th>
<th>Disturbance Allowance/ (Ghc)</th>
<th>Other Assistance if any (Ghc)</th>
<th>Total compensation (Ghc)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Compensation Payment Commitment:

I, ................................................................., having received the above total compensation amount for the crops within the project area in question on .................................................................(i.e. date of compensation payment), have agreed in principle to vacate the said project area/allow the contractor entry to the said area, for which compensation has been paid for the crops thereon, on .................................................................(agreed date when owner of crop should vacate the affected project area or allow contractor entry to the area).

Signature or Thumb print of claimant /recipient: .................................................................

Contact of claimant/ recipient: ................................................................. Date: .................................................................

Name of Administrator (PCU Representative): .................................................................

Signature of Administrator: ................................................................. Date: .................................................................

Contact of Administrator: .................................................................
CONSTRUCTION OF DRAINS/CULVERTS UNDER THE GAMA PROJECT

-COMPENSATION CLAIM AND COMMITMENT FORM FOR STRUCTURES-

Affected Person Information:

Name of Claimant: ................................................................. Sex: .................. Age: ......................

Name of Authorized Representative: ............................................................

Current Abode: .........................................................

<table>
<thead>
<tr>
<th>Location of structure</th>
<th>Value of Affected Structure(s) /business (Ghc)</th>
<th>Disturbance Allowance (Ghc)</th>
<th>Loss of income/livelihood Assistance if applicable (Ghc)</th>
<th>Other Assurances if any (Ghc)</th>
<th>Total compensation (Ghc)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

Compensation Payment Commitment:

I, ................................................................................., having received the above total compensation amount for the above structure(s)/affected business and other applicable assistance on ............................................................(date of compensation payment), have agreed in principle to vacate the project site/land(s)/allow construction work to proceed, for which compensation has been paid, on ............................................................(agreed date when affected person should vacate the affected area/land or allow the contractor entry to the area for construction work).

Signature or Thumb print of claimant /recipient: ........................................................................................................

Contact of claimant/ recipient: ........................................ Date: ........................................................

Name of Administrator (PCU Representative): ............................................................

Signature of Administrator: ........................................ Date: ........................................................

Contact of Administrator: .............................................................
ANNEX 4 GRIEVANCE REDRESS SAMPLE FORM

CONSTRUCTION OF DRAINS/CULVERTS UNDER THE GAMA PROJECT
-GRIEVANCE AND RESOLUTION FORM FOR THE ARAP IMPLEMENTATION-

Name (Filer of Complaint): ……………………………………………………………………………………………………………………
ID Number (PAPs ID number): ……………………………………………………………………………………………………………………
Contact Information (house number/ mobile phone): ………………………………………………………………………………………
Nature of Grievance or Complaint: …………………………………………………………………………………………………………..

<table>
<thead>
<tr>
<th>Date</th>
<th>Individuals Contacted</th>
<th>Summary of Discussion</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Signature………………………………………. Date: …………………………………………
Signed (Filer of Complaint): ……………………………………………………………………………………..

Name of Person Filing Complaint (if different from Filer): ……………………………………………………..
Position or Relationship to Filer: ……………………………………………………………………………………………

Review/Resolution

Date of Conciliation Session: …………………………………………………………………………………………………………
Was Filer Present?: Yes No
Was field verification of complaint conducted? Yes No
Findings of field investigation: ………………………………………………………………………………………………………

Summary of Conciliation Session Discussion…………………………………………………………………………………………

Issues…………………………………………………………………………………………………………………………………………………………
Was agreement reached on the issues? Yes No
If agreement was reached, detail the agreement below:
If agreement was not reached, specify the points of disagreement below:
…………………………………………………………………………………………………………………………………………………………
…………………………………………………………………………………………………………………………………………………………

Signed (Conciliator): ………………………………………… Signed (Filer): ………………………………………………..
Signed: ………………………………………………………………………………………………………………………………………
(Independent Observer)
Date: ………………………………………………………………………