IMPLEMENTATION COMPLETION AND RESULTS REPORT
(IDA-H8510)

ON A

GRANT

IN THE AMOUNT OF SDR 3.4 MILLION
(US$5.0 MILLION EQUIVALENT)

TO THE

REPUBLIC OF GHANA

FOR A

NATURAL RESOURCES AND ENVIRONMENTAL GOVERNANCE TECHNICAL ASSISTANCE PROJECT

August 31, 2017

Environment and Natural Resources Global Practice
Africa Region
CURRENCY EQUIVALENTS

(Exchange Rate Effective (December 31, 2016))

Currency Unit = New Ghanaian Cedi (GHS)
GHS 1.00 = US$ [0.2392]
US$1.00 = GHS [4.1811]

FISCAL YEAR
January 1 - December 31

ABBREVIATIONS AND ACRONYMS

ALP       Alternative Livelihood Program
ASM       Artisanal and Small-Scale Mining
CCSI-MDS  Climate Change Support and Impact Monitoring Disclosure System
CPS       Country Partnership Strategy
CSO       Community Service Organization
CSR       Corporate Social Responsibility
DFID      Department for International Development (U.K.)
DMC       District Mining Committee
DP        Development Partner
DPO       Development Policy Operation
EC        European Commission
EU        European Union
EPA       Environmental Protection Agency
FC        Forestry Commission
FDMP      Forestry Development Master Plan
FIP       Forest Investment Program
GDP       Gross Domestic Product
GEITI     Ghana Extractive Industries Transparency Initiative
GoG       Government of Ghana
ICR       Implementation Completion and Results Report
ISM       Implementation Support Mission
ISR       Implementation Status and Results Report
M&E       Monitoring and Evaluation
MC        Minerals Commission
MDA       Ministry, Department, and Agency
MESTI     Ministry of Environment, Science, Technology, and Innovation
METT      Management Effectiveness Tracking Tool
MLNR      Ministry of Lands and Natural Resources
MoF       Ministry of Finance
NAMA      Nationally Appropriate Mitigation Action Plan
NRE       Natural Resources and Environment
NREG      Natural Resources and Environmental Governance
NRM       National Resource Management
PAD       Project Appraisal Document
PCU  Project Coordination Unit
PDO  Project Development Objective
PS   Procurement Specialist
SME  Small and Medium Enterprise
TA   Technical Assistance
TCC  Technical Coordinating Committee
TTL  Task Team Leader
UMaT University of Mines and Technology

Senior Global Practice Director: Karin Kemper
Practice Manager: Magda Lovei
Project Team Leader: Asferachew Abate Abebe
ICR Team Leader: Asferachew Abate Abebe
GHANA
Natural Resources and Environmental Governance Technical Assistance

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DATA SHEET

A. Basic Information

<table>
<thead>
<tr>
<th>Country:</th>
<th>Ghana</th>
<th>Project Name:</th>
<th>Natural Resources and Environmental Governance Technical Assistance</th>
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<tbody>
<tr>
<td>Project ID:</td>
<td>P129769</td>
<td>L/C/TF Number(s):</td>
<td>IDA-H8510</td>
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<tr>
<td>ICR Date:</td>
<td>08/31/2017</td>
<td>ICR Type:</td>
<td>Core ICR</td>
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<tr>
<td>Lending Instrument:</td>
<td>Technical Assistance Loan</td>
<td>Borrower:</td>
<td>REPUBLIC OF GHANA</td>
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<tr>
<td>Original Total Commitment:</td>
<td>SDR 3.40 million</td>
<td>Disbursed Amount:</td>
<td>SDR 3.40 million</td>
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<td>Revised Amount:</td>
<td>SDR 3.40 million</td>
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Environmental Category: B - partial assessment

Implementing Agencies:
Ministry of Finance

Cofinanciers and Other External Partners:

B. Key Dates

<table>
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<tr>
<th>Process</th>
<th>Original Date</th>
<th>Revised / Actual Date(s)</th>
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<tr>
<td>Concept Review:</td>
<td>02/13/2012</td>
<td>03/03/2014</td>
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<td>Appraisal:</td>
<td>04/11/2013</td>
<td>Restructuring(s):</td>
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<td>Approval:</td>
<td>06/06/2013</td>
<td>Mid-term Review:</td>
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<td>Closing:</td>
<td>12/31/2016</td>
<td>12/31/2016</td>
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</table>

C. Ratings Summary

C.1 Performance Rating by ICR

| Outcomes: | Moderately Satisfactory |
| Risk to Development Outcome: | Substantial |
| Bank Performance: | Moderately Satisfactory |
| Borrower Performance: | Moderately Satisfactory |

C.2 Detailed Ratings of Bank and Borrower Performance (by ICR)

<table>
<thead>
<tr>
<th>Bank</th>
<th>Ratings</th>
<th>Borrower</th>
<th>Ratings</th>
</tr>
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<td>Quality at Entry:</td>
<td>Moderately Unsatisfactory</td>
<td>Government:</td>
<td>Moderately Unsatisfactory</td>
</tr>
<tr>
<td>Quality of Supervision:</td>
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<td>Implementing Agency/Agencies:</td>
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<tr>
<td>Overall Bank Performance:</td>
<td>Moderately Satisfactory</td>
<td>Overall Borrower Performance:</td>
<td>Moderately Satisfactory</td>
</tr>
<tr>
<td>--------------------------</td>
<td>-------------------------</td>
<td>-------------------------------</td>
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### C.3 Quality at Entry and Implementation Performance Indicators

<table>
<thead>
<tr>
<th>Implementation Performance</th>
<th>Indicators</th>
<th>QAG Assessments (if any)</th>
<th>Rating</th>
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<tr>
<td>Potential Problem Project at any time (Yes/No):</td>
<td>No</td>
<td>Quality at Entry (QEA):</td>
<td>None</td>
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<td>Problem Project at any time (Yes/No):</td>
<td>Yes</td>
<td>Quality of Supervision (QSA):</td>
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<td>DO rating before Closing/Inactive status:</td>
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### D. Sector and Theme Codes

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<tr>
<th>Major Sector/Sector</th>
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<tr>
<td>Agriculture, Fishing and Forestry</td>
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<td>Forestry</td>
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<td>43</td>
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<td>Public Administration</td>
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<td></td>
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<tr>
<td>Other Public Administration</td>
<td>34</td>
<td>34</td>
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<tr>
<td>Energy and Extractives</td>
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<td></td>
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<td>Public Administration - Energy and Extractives</td>
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<td>13</td>
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</table>

<table>
<thead>
<tr>
<th>Major Theme/Theme/Sub Theme</th>
<th>Original</th>
<th>Actual</th>
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<tr>
<td>Environment and Natural Resource Management</td>
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<td>Climate change</td>
<td>15</td>
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<td>Adaptation</td>
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<td>Mitigation</td>
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<td>Air quality management</td>
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<td>2</td>
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<td>Soil Pollution</td>
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<td>Water Pollution</td>
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<tr>
<td>Environmental policies and institutions</td>
<td>61</td>
<td>61</td>
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<tr>
<td>Public Sector Management</td>
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<td>Public Administration</td>
<td>9</td>
<td>9</td>
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<td>Transparency, Accountability and Good Governance</td>
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<td>Public Finance Management</td>
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<td>9</td>
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<td>Public Expenditure Management</td>
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E. Bank Staff

<table>
<thead>
<tr>
<th>Positions</th>
<th>At ICR</th>
<th>At Approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vice President:</td>
<td>Makhtar Diop</td>
<td>Makhtar Diop</td>
</tr>
<tr>
<td>Country Director:</td>
<td>Henry Kerali</td>
<td>Yusupha B. Crookes</td>
</tr>
<tr>
<td>Practice Manager/Manager:</td>
<td>Magda Lovei</td>
<td>Magda Lovei</td>
</tr>
<tr>
<td>Project Team Leader:</td>
<td>Asferachew Abate Abebe</td>
<td>Flavio Chaves</td>
</tr>
<tr>
<td>ICR Team Leader:</td>
<td>Asferachew Abate Abebe</td>
<td></td>
</tr>
<tr>
<td>ICR Primary Author:</td>
<td>Darshani De Silva</td>
<td></td>
</tr>
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</table>

F. Results Framework Analysis

Project Development Objectives (from Project Appraisal Document)

The PDO was to improve the institutional capacity of key ministries, departments and agencies (MDAs) in natural resources and environmental management.

Revised Project Development Objectives (as approved by original approving authority)

Not applicable.

(a) PDO Indicator(s)¹

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Baseline Value</th>
<th>Original Target Values (from approval documents)</th>
<th>Formally Revised Target Values</th>
<th>Actual Value Achieved at Completion or Target Years</th>
</tr>
</thead>
<tbody>
<tr>
<td>Indicator 1</td>
<td>Revenue forecasting model for the NRM sector in place and operational at the Ministry of Finance</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Value (quantitative or qualitative)</td>
<td>No</td>
<td>Yes</td>
<td></td>
<td>No</td>
</tr>
<tr>
<td>Date Achieved</td>
<td>March 1, 2013</td>
<td>December 31, 2016</td>
<td>December 31, 2016</td>
<td></td>
</tr>
<tr>
<td>Comments (including % achievement)</td>
<td>Target partially achieved. Model was developed and tested and reported by the Ministry of Finance team to be ready and in place but is not yet operational at the Ministry of Finance. The project was successful in developing the revenue forecasting model that will support the MoF to mainstream Natural Resources and Environment (NRE) management concerns into sector and macro-economic</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

¹ There were two sets of indicators presented in the Project Appraisal Document (PAD): under Section B and in the Results Framework in Annex 1 (please refer to section 1.3 for details). For this assessment, the PDO indicators identified in Section B of the PAD are used, including the core sector indicator introduced during project implementation.
planning. The finalization of the model was delayed and therefore could not be included in the budget cycles of years 2 and 3 of the project as envisaged. It supported the establishment of streamlined institutional arrangements with clear designation of roles and responsibilities of different agencies and equipped the NRE agencies with necessary analytical tools to enhance efficiency in revenue forecasting. The MoF confirmed the model will be operationalized in the budget cycle of the new Government and intends to use it for the next budget cycle; separate training on its use was provided outside of the project scope. This indicator measures the improved institutional capacity of key ministries, departments and agencies (MDAs) in natural resources and environmental management aspect of the PDO.

### Indicator 2

**Forestry Development Master Plan revised and validated and related training on its implementation provided**

<table>
<thead>
<tr>
<th>Value (quantitative or qualitative)</th>
<th>No</th>
<th>Yes</th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date Achieved</td>
<td>October 4, 2014</td>
<td>December 31, 2016</td>
<td>December 31, 2016</td>
</tr>
</tbody>
</table>

**Comments (including % achievement)**

**Target achieved.** The Forestry Development Master Plan (FDMP) was revised, consulted on (through three regional stakeholder consultative workshops in Ho (covering Volta, Central, Eastern, and Greater Accra Regions), in Kumasi (covering Ashanti, Brong-Ahafo, and Western Regions) and in Tamale (covering Upper West, Upper East, and Northern Regions), finalized, and validated by stakeholders. It was launched on November 23, 2016. The FDMP is aimed at halting the country’s fast reducing forest resources and forming policies and programs to direct the forestry sector to make a better contribution to the country’s development. In support of the implementation of the FDMP, the project also supported the preparation of Integrated Forest Management Plans for three priority reserves and finalization of the Ghana Forest Plantation Strategy and Tree Tenure and Benefit Sharing Framework. Training was provided to the Forestry Commission on how to implement the FDMP. This indicator measures the improved institutional capacity of key ministries, departments and agencies (MDAs) in natural resources and environmental management aspect of the PDO.

### Indicator 3

**Number of District Mining Committees established, trained and equipped**

<table>
<thead>
<tr>
<th>Value (quantitative or qualitative)</th>
<th>2</th>
<th>13</th>
<th>24</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date Achieved</td>
<td>March 1, 2013</td>
<td>December 31, 2016</td>
<td>December 31, 2016</td>
</tr>
</tbody>
</table>

**Comments (including % achievement)**

**Target exceeded (200%).** Target surpassed in June 3, 2016. A total of 24 DMCs were inaugurated, trained, and equipped and are fully operational to ensure improved management of Artisanal and Small-Scale Mining (ASM) at the district level. As part of strengthening the staff, 115 individuals were trained on exploration, surveying, mining and processing techniques, book keeping, and policy and legal issues. Staff capacity was strengthened to manage the subsector
with improved knowledge of the institutional collaboration necessary for the subsector’s effective governance, and how to address environmental and social impacts associated with the subsector. With improved capacity of District Mining Offices, there is reporting of significant improvement in the monitoring activities with the support of DMCs and reporting relating to illegal mining. This indicator measures the improved institutional capacity of key ministries, departments and agencies (MDAs) in natural resources and environmental management aspect of the PDO.

**Indicator 4**

<table>
<thead>
<tr>
<th>Value (quantitative or qualitative)</th>
<th>No</th>
<th>Yes</th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date Achieved</td>
<td>March 1, 2013</td>
<td>December 31, 2016</td>
<td>December 31, 2016</td>
</tr>
</tbody>
</table>

**Comments (including % achievement)**

Achieved. A charcoal Nationally Appropriate Mitigation Action Plan (NAMA) was completed and posted on the Environmental Protection Agency (EPA) website; the NAMA includes a complete implementation budget (costing) and a time-bound implementation plan, the assessment of potential climate change mitigation that can be achieved and related cost analysis. The charcoal sector was selected because of its direct linkage to forest resources and environmental management, as one of the major sources of greenhouse gas emissions in the country. The NAMA focused on the entire charcoal supply chain from feedstock production to carbonization to distribution and an approach that is expected to empower and incentivize the existing charcoal industry to adopt modern practices for responsible production and distribution of charcoal. The adoption of the NAMA, mobilizing both public and private resources to implement it, will help achieve NRE management outcomes of this sector, as a result of substantial emissions reductions, increased access to clean energy, reduced deforestation and land degradation, and improved taxation. This indicator measures the improved institutional capacity of key ministries, departments and agencies (MDAs) in natural resources and environmental management aspect of the PDO.

**Indicator 5**

<table>
<thead>
<tr>
<th>Value (quantitative or qualitative)</th>
<th>0</th>
<th>1,000 Females (no target when the indicator was introduced)</th>
<th>6,014 Females 1,073 (18%)</th>
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<tbody>
<tr>
<td>Date Achieved</td>
<td>October 4, 2014</td>
<td>December 31, 2016</td>
<td>December 31, 2016</td>
</tr>
</tbody>
</table>

**Comments (including % achievement)**

Target exceeded (600%). This included 1,157 under Ministry of Finance (MoF) activities; 805 under Minerals Commission (MC) activities (190 under Artisanal and Small-Scale Mining (ASM) activities and about 500 under District Mining Committee (DMCs)); 115 under University of Mines and Technology (UMaT) training, 1,604 under EPA, and 2,448 under Forestry Commission (FC)/ Ministry of Lands and Natural Resources (MLNR) activities.

(b) Intermediate Outcome Indicator(s)
<table>
<thead>
<tr>
<th>Indicator</th>
<th>Baseline Value</th>
<th>Original Target Values (from approval documents)</th>
<th>Formally Revised Target Values</th>
<th>Actual Value Achieved at Completion or Target Years</th>
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<tbody>
<tr>
<td><strong>Indicator 1</strong></td>
<td>Guidelines on conduct of consultations with non-state actors engaged in the NRE sectors through a participatory process by TCC</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Value (quantitative or qualitative)</td>
<td>No</td>
<td>Yes</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>Date Achieved</td>
<td>March 1, 2013</td>
<td>December 31, 2016</td>
<td></td>
<td>June 3, 2016</td>
</tr>
<tr>
<td>Comments (including % achievement)</td>
<td><strong>Achieved.</strong> Guidelines were prepared and disseminated to all sectoral agencies as well as posted on the Ministry of Finance’s website. These are to be used for engagement with the civil society organizations, both through the coordinating platform and individually.</td>
<td></td>
<td></td>
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<tr>
<td><strong>Indicator 2</strong></td>
<td>Review of schemes on tree tenure and benefit-sharing drafted in a participatory process</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Value (quantitative or qualitative)</td>
<td>No</td>
<td>Yes</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>Date Achieved</td>
<td>March 1, 2013</td>
<td>December 31, 2016</td>
<td></td>
<td>September 30, 2016</td>
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<tr>
<td>Comments (including % achievement)</td>
<td><strong>Achieved.</strong> The review of tree tenure and benefit-sharing schemes was completed, through a participatory process that included stakeholder workshops, regional consultations, focused stakeholder groups, and intersectoral consultations. This will serve as a basis for related activities under the Forest Investment Program, for piloting the schemes that are found most enabling for tree and forest protection and most beneficial to the tree owners, to provide appropriate incentives for sustainable forest management.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Indicator 3</strong></td>
<td>Forestry Management plans approved for selected Forest Reserves by FC and MLNR</td>
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<tr>
<td>Value (quantitative or qualitative)</td>
<td>0</td>
<td>3</td>
<td>3</td>
<td></td>
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<tr>
<td>Date Achieved</td>
<td>March 1, 2013</td>
<td>December 31, 2016</td>
<td>September 30, 2016</td>
<td></td>
</tr>
<tr>
<td>Comments (including % achievement)</td>
<td><strong>Achieved.</strong> Forest Management Plans for the following three forest reserves were prepared, validated, and published: Yakombo (in Buipe Forest District), Tinte Bepo (Mankranso Forest District), and Fure Headwaters (Asankrangwa Forest District). The Forest Management Plans serve as a management tool for each reserve and contribute to the capacity of the Forestry Commission to effectively and efficiently manage, protect, and develop forest and wildlife resources in each of these reserves.</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td><strong>Indicator 4</strong></td>
<td>Plantation Strategy drafted by Forestry Commission and submitted for consultation with state and non-state stakeholders</td>
<td></td>
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<tr>
<td>Indicator 5</td>
<td>Mining companies that have submitted local procurement plans according to the new regulations, and verified by MC</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Value (quantitative or qualitative)</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Date Achieved</td>
<td>March 1, 2013</td>
<td>December 31, 2016</td>
<td>June 3, 2016</td>
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<tr>
<td>Comments (including % achievement)</td>
<td>Achieved. Additional consultations with various stakeholders, both national and local, took place and the final Plantation Strategy was published.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Indicator 6 | Nationally Appropriate Mitigation Action Plan prepared for one priority sector (costed and time-bound) |
| Value (quantitative or qualitative) | No | Yes | Yes |
| Date Achieved | March 1, 2013 | December 31, 2016 | June 3, 2016 |
| Comments (including % achievement) | Achieved. A NAMA was prepared for the charcoal (energy sector) which is a priority sector because of its direct linkage to forest resources and environmental management. The NAMA was costed and time bound. |

G. Ratings of Project Performance in ISRs

<table>
<thead>
<tr>
<th>No.</th>
<th>Date ISR Archived</th>
<th>DO</th>
<th>IP</th>
<th>Actual Disbursements (US$, millions)</th>
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<td>1</td>
<td>12/24/2013</td>
<td>Satisfactory</td>
<td>Satisfactory</td>
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<tr>
<td>2</td>
<td>07/30/2014</td>
<td>Satisfactory</td>
<td>Satisfactory</td>
<td>1.00</td>
</tr>
<tr>
<td>3</td>
<td>01/30/2015</td>
<td>Moderately Satisfactory</td>
<td>Moderately Unsatisfactory</td>
<td>1.36</td>
</tr>
<tr>
<td>4</td>
<td>08/06/2015</td>
<td>Moderately Unsatisfactory</td>
<td>Moderately Unsatisfactory</td>
<td>1.54</td>
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<tr>
<td>5</td>
<td>12/18/2015</td>
<td>Moderately Satisfactory</td>
<td>Moderately Satisfactory</td>
<td>2.19</td>
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<td>6</td>
<td>06/16/2016</td>
<td>Moderately Satisfactory</td>
<td>Moderately Satisfactory</td>
<td>3.77</td>
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<td>7</td>
<td>12/19/2016</td>
<td>Moderately Satisfactory</td>
<td>Moderately Satisfactory</td>
<td>4.87</td>
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H. Restructuring (if any)

Not Applicable.

I. Disbursement Profile
1. Project Context, Development Objectives, and Design

1.1 Context at Appraisal

1. **Country and sector background.** Ghana’s landscapes and oceanscapes provide a wealth of natural resources such as oil and gas, gold, forests, and fish. These natural resources have driven economic growth and poverty reduction and will likely continue to do so in future. To sustain natural resources’ contribution to development and poverty alleviation goals, Ghana's institutions must be able to plan and manage the development of those resources in an efficient, equitable, and sustainable manner. To ensure that recent gains in poverty reduction and growth are maintained, Ghana needs to address both the root causes of macroeconomic instability that often limits the quality of public expenditures and the threats to the sustainability of the resources that contribute to prosperity.

2. Natural resources are critical for Ghana’s economic growth, jobs, and poverty alleviation. Activities based on land, water, forest, and fisheries resources contribute more than 20 percent of gross domestic product (GDP) and 60 percent of jobs. Furthermore, the environmental policy needs to be strengthened to effectively control pollution and to reduce long-term negative health and economic impacts due to environmental degradation and climate change. Recognizing the importance of these sectors, threats to their sustainability, and growing costs, the Government of Ghana (GoG) launched a five-year (2008–2012) Natural Resources and Environmental Governance (NREG) program. The program had the overall objective of ensuring economic growth, poverty alleviation, increasing revenues, and improving environmental protection. The GoG's NREG program received technical and financial support from the Netherlands, the United Kingdom, France, the European Union (EU), and the World Bank (NREG partners).

3. The World Bank supported the NREG program through a series of three Development Policy Operations (DPOs)2 from 2008–2011 totaling US$25.9 million. Through this DPO series and other development partner (DP) support, the GoG achieved progress in several specific reforms, for example, passage of the Forest and Wildlife Policy and the Climate Change Policy in Cabinet, passage of six regulations to effectively enforce the Minerals and Mining Act (2006, Act 703), and strengthening of the institutional platform for sector dialogue. The program resulted in a step change such as revenue management and transparency in the dialogue with the Government on further improving NREG. In early 2011, the GoG initiated dialogue with DPs for the preparation of a second phase of the NREG program. Drawing on the lessons learned at the midterm review and completion report of the DPO series, it was agreed that the new phase of World Bank support would (a) focus on a smaller number of key reforms and cross-cutting issues complementary to broader investments supported by other DPs and (b) include a linked technical assistance (TA) operation to strengthen policy analysis, implementation, and stakeholder consultation.

4. **Rationale for World Bank assistance.** The 2005 Ghana Natural Resources Management and Growth Sustainability Economic and Sector Work evaluated the economic costs to be about US$516 million in terms of lost productivity due to damage to five types of natural assets:

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2Ghana NREG- DPOs: P102971, P113172 and P118188.
agricultural land, forest and savanna woodlands, coastal fisheries and wetlands, wildlife, and Lake Volta. This finding was further verified by the 2006 Country Environmental Analysis, which assessed that the high rate of natural resource degradation represents an annual cost of about 10 percent of GDP, representing almost half of Ghana's US$1.5 billion annual official development assistance. Against the backdrop of this situation, IDA investment in the natural resources sector was justified.

5. The TA was in line with the Country Partnership Strategy (CPS)\(^3\) of 2013–2016 whose stated objective was to assist Ghana in sustaining economic growth, accelerating poverty reduction, and enhancing shared prosperity in a sustainable manner, while seeking to consolidate its transition to lower-middle-income status, address sources of inequality, and help pave the way for accessing IBRD financing. The CPS recognized that Ghana's natural resource wealth is a platform for economic and social development and identified the NREG TA to assist the GoG in mainstreaming natural resources and environment (NRE) in economic management. In addition, the Implementation Completion and Results Report (ICR) of the NREG DPO series recognized the need to improve the analytical underpinnings needed for development assistance, as well as TA to strengthen policy analysis, implementation, and stakeholder consultation.

1.2 Original Project Development Objectives (PDO) and Key Indicators

6. The PDO was to improve the institutional capacity of key ministries, departments and agencies (MDAs) in natural resources and environmental management.

7. There were two sets of indicators presented in the Project Appraisal Document (PAD): under Section B and in the Results Framework in Annex 1 (please refer to section 1.3 for details). For this report, the PDO indicators identified in Section B of the PAD are used as listed below including the core sector indicator introduced during project implementation:

- Revenue forecasting model for the NRM sector in place and operational at the Ministry of Finance
- Forestry Development Master Plan revised and validated and related training on its implementation provided
- Number of District Mining Committees established, trained and equipped
- Nationally Appropriate Mitigation Action Plan fully finalized (costed and time-bound)
- Direct Project beneficiaries (core sector indicator)

1.3 Revised PDO (as approved by original approving authority) and Key Indicators, and reasons/justification

8. The PDO was not revised.

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\(^3\) The 2013–2016 CPS was extended till the end of FY2017.
9. The World Bank introduced a new PDO-level indicator during the first implementation support mission on direct project beneficiaries in line with the core sector indicators under the corporate requirement that was put in place in September 2014. There was some ambiguity in the presentation of PDO results indicators in the various PAD sections that were corrected to one set of agreed indicators during implementation (see section 1.2). Formal restructuring was not conducted, as the team considered this a clarification of an existing set of indicators from the approved PAD. This resulted in dropping the indicator on “Management Effectiveness Tracking Tool (METT) score (disaggregated by Forest Reserve)” from annex 1, moving the indicator on “Climate Change Support and Impact Monitoring Disclosure System (CCSI-MDS) project database on mitigation and adaptation publicly accessible” to the intermediate level and replacing the Nationally Appropriate Mitigation Action Plan (NAMA) indicator in Section B with the NAMA intermediate indicator from Annex 1 (NAMA prepared for one priority sector).

Figure 1 shows the two sets of PDO results indicators from the PAD and the agreed PDO indicators.

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4 This indicator did not require project restructuring.

5 The World Bank implementation support team flagged the inconsistencies in the Results Framework in June 2014, and it was discussed with the Project Coordination Unit (PCU) in September 2014. The PCU responded in October 2014 on the final selection of indicators, which was reflected in the first Implementation Support Mission (ISM) and related Implementation Status and Results Report (ISR).
1.4 Main Beneficiaries

10. The ultimate beneficiaries of this operation were the current and future generations benefiting from the revenues of sustainable use of natural resources and good environmental quality. The direct beneficiaries of the NREG TA were the ministries, departments, and agencies (MDAs) in charge of NRE management, namely, the Ministry of Lands and Natural Resources (MLNR), including its specialized commissions, the Forestry Commission (FC) and the Minerals Commission (MC); the Ministry of Environment, Science, Technology, and Innovation (MESTI) along with its specialized agency, the Environmental Protection Agency (EPA); and the Ministry of Finance (MoF). Other stakeholders, including the local population, private sector operators, and civil society organizations (CSOs) were expected to indirectly benefit from the TA operation through the analytical work and institutional development to be supported in key areas in the forestry, mining, and environment sectors.

1.5 Original Components

11. The World Bank financed this TA operation with an IDA Grant of SDR 3.4 million (US$5 million equivalent at appraisal) and the Government provided unquantified in-kind contributions of staff time and operational costs. The project had three components.

12. **Component 1: Supporting policy-making and knowledge management** (appraisal - US$ 2,620,000). This component was intended to finance consultancies, services, and operating costs toward the development of studies and related consultations to address key issues on NREG as identified during the first phase of the NREG program including (a) the development of public consultation guidelines for the NRE sectors; (b) the socioeconomic analyses of benefit-sharing arrangements in the forest sector; (c) development of guidelines for local procurement in the mining sector; and (d) development of the CCSI-MDS. These were expected to build the knowledge of MDAs for the management of NREG and related policy making.

13. **Component 2: Strengthening institutional capacity to support sustainable natural resources and environmental management** (appraisal - US$ 1,560,000). This component aimed at financing consultancies, services, goods, and operating costs toward the development of capacity-building activities meant to strengthen the capacity of MDAs to deliver key services including (a) the development of a revenue forecasting model for natural resources; (b) capacity building for forest management and forest planning in district offices; (c) strengthening of the MC, the MC district offices, and the EPA for managing artisanal and small-scale mining (ASM); and (d) training of GoG negotiators and policy makers on climate change.

14. **Component 3: Project management and related capacity building** (appraisal - US$ 820,000). The component focused on financing consultancies, services, goods, and operating costs to ensure planning, management, coordination, reporting, and auditing of activities in line with World Bank standards.

1.6 Revised Components

15. The components were not revised.
1.7 Other significant changes

16. No significant changes were made to the design, implementation arrangements, and schedule of funding allocations. Some changes to the outputs were made during the implementation because of cost overrun, as some of the consultancies ended up being priced higher than what was indicated at appraisal. Changes were made to the scope of activities to focus on activities that could be expedited and some activities were dropped.

2. Key Factors Affecting Implementation and Outcomes

2.1 Project Preparation, Design, and Quality at Entry

17. Project preparation for NREG TA was conducted between 2012 and 2013. The project was approved by the World Bank in June 2013 and became effective in March 2014. Although the TA was identified to be prepared on a ‘fast track’ with Board approval planned for the latter part of 2012, because of low priority given to the TA and changes made to ministerial portfolios with the change of the President, it took two years for the project to become ready for implementation. The overall activities initially identified remained relevant for NREG; however, this delay resulted in significant updates and changes to the scope of activities discussed and agreed during the early stages of preparation. As a result, time was spent in the initial stages of project implementation on rescaling the details and content of activities before implementation actually commenced.

18. Soundness of background analysis. The TA activities were built on extensive prior analytical work conducted by the World Bank and DPs, including the European Commission (EC), U.K. Department for International Development (DFID), the Government of Netherlands, and others who continued to support the GoG’s NREG program. The findings of these studies were summarized and presented in the PAD. It benefitted from the experience of implementing the first DPO series responding to the importance and need to support the reform agenda through (a) the provision of targeted analytical work on forestry and mining sectors and improving environmental management and (b) strengthening of institutional capacity of MDAs in charge of implementing the reforms for NREG to ensure wider impacts on policies, practices, and implementation capacities.

19. The institutional framework of overall implementation as led by the MoF was appropriate as the ministry has responsibility for governing the financial resources and for the effective coordination of Government institutions. The need for three sectors (that is, minerals, forestry, and environment) to work closely for effective NRE management was deemed to require a multisectoral Technical Coordinating Committee (TCC) to provide oversight and technical

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6 Discussions with implementing agencies during the ICR mission also revealed TAs often do not come high in the agenda of the higher authorities compared to investment projects and budget support.
7 Following the death of the former president and with the appointment of the new president, the Cabinet of Ministers was changed in January 2013.
8 The background assessment that justifies the status of the sector and its needs is well documented in the PAD.
9 The TCC was established in 2007 for the NREG program to be chaired by the Chief Director, MoF. However, the TCC was often chaired by the Project Coordinator for the TA deviating from the original reason for the establishment.
support and to ensure timely delivery of inputs and actions and effective mainstreaming of findings of the analytical work into policies and programs.

20. Initially, the support to NREG was proposed as a second series of DPO (US$50 million equivalent budget support over a two-year period) complemented by a two-year US$5 million credit TA. This DPO was to come as a continuity of the first three-year DPO for the implementation of the five-year NREG program. Given Ghana’s difficult economic situation, the Government raised concerns of borrowing for a second NREG DPO. It was also recognized that the GoG was unable to fulfill all the prior actions. The World Bank’s country management responded to this concern and made the decision to restrict the support only to the TA, considering that TA would still provide important benefits compared to no support at all.

21. Assessment of project design. The TA was designed to help the GoG further improve policies, develop technical tools and skills, and solidify institutional capacities needed to sustain Ghana's NREG program that commenced in 2008. It was focused on providing the GoG with timely and targeted technical support and analysis for the implementation of its NREG program to improve natural resource management outcomes in key sectors.

22. The TA was relatively complex due to the number of institutions\(^{10}\) responsible for delivery of NREG as well as the need to address difficult policy issues and challenges encountered during the first DPO series. As mentioned earlier, the PAD provided good analytical background and rationale for each activity selected for financing. However, it did not provide sufficient clarity on the design of components, particularly specifying and defining the complex linkages of different sectors necessary to demonstrate the impact of the TA. Upon project effectiveness, the terms of references for the analytical work were found to be inadequate by the World Bank implementation support team. This generality in the PAD and absence of suitable terms of references caused delays between the World Bank and the implementing agencies in reaching agreement on the scope of activities.

23. Project design benefitted from consultation with DPs, civil society, and the private sector; however, it did not effectively consider the ongoing and planned operations of other DPs in relation to the role and deliverables of the TA. There was no formal coordination mechanism for the NREG DPs from the side of the Government.\(^{11}\)

24. There were inconsistencies in presenting the indicators as part of defining the PDO and in the Results Framework. All four indicators under the Section B PDO Level Results Indicators were presented differently under the Annex 1 Results Framework. This issue was subsequently identified and captured during the first ISM in December 2014 (please see sections 1.2 and 1.3 for details). The selected indicators to report on the PDO were more output and process oriented and

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\(^{10}\) Three ministries and three agencies, namely, the MLNR, MESTI, MoF, MC, FC, and EPA.

\(^{11}\) As per the PAD, the TCC was originally constituted to undertake broader coordination including the DPs. However, it was informed during the ICR interviews that this has not taken place in practice. There are some evidences of possible overlap of resources and outputs. For example, the mining cadaster was dropped during implementation when the World Bank team realized that the Government of Australia was also financing it. Discussion with the United Nations Development Programme highlighted contribution to the same climate change-related activities. Also, the final evaluation report of the NREG Sector Budget Support Program of the EU alludes to possible overlaps.
do not reflect directly the improvements made to the institutional capacity building of MDAs (please see section 2.3 for additional details).

25. **Adequacy of the Government’s commitment.** The GoG’s commitment at project entry to deliver NREG was demonstrated by (a) progress made before the TA with the first phase of the NREG program in several specific reforms, including passing the Forest and Wildlife Policy and Climate Change Policy in Cabinet, six regulations to enforce the Minerals and Mining Act of 2006, and strengthening of the institutional platform for sector dialogue; (b) the ongoing assessment to improve revenue management and transparency; and (c) the initiation of dialogue with DPs for the preparation of the second phase of support to the NREG program. The GoG identified a qualified team of Government staff to work with the World Bank. It also committed (a) the staff time and operational costs for implementing the TA; and (b) to fully involve stakeholders as part of participatory processes.

26. The project took over two years since its inception to complete preparation activities and become effective as described earlier. Change in government, slow internal processes, and macroeconomic situation of the country contributed to the delay.

27. **Assessment of risks.** The overall risk of the project was rated Moderate at entry. Although the overall rating proved to be appropriate for the type and scale of the proposed interventions, it was inadequate based on the level of capacity and governance within which the project was to be implemented. The overall implementing agency including fiduciary rating was low, although the procurement and financial management risk assessments were appraised as Moderate. Implementation arrangements were built on those established under the first phase of the NREG program, which was assessed by the World Bank to be adequate, where the TA was coordinated by the MoF and implemented by NRE management agencies. Possible risk due to lack of leadership from Government decision makers was not considered, even with the long gestation period and the reasons for the delay in making the project effective.\(^{12}\)

**2.2 Implementation**

28. Implementation progress and performance varied throughout the project period. The project performance rating was downgraded from Satisfactory to Moderately Unsatisfactory, after the first ISM in December 2014 following the project launch, because of poor implementation progress.\(^{13}\) In November 2015, implementation performance improved to Moderately Satisfactory and remained stable for the remainder of the project. Despite the challenges throughout most of the project implementation period, approximately 98 percent of the available funds were disbursed and majority of outcome and output targets were met by the original closing date.

29. While the project’s uncomplicated overall design complemented the emerging context for NREG at the time of preparation, it did not consider and describe effectively the complex linkages of NRE sectors to the overall outcome. Therefore, technical negotiations between the World Bank and the Government to agree on the scope of different activities and outputs became lengthy and

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\(^{12}\) The World Bank team mentioned during the interviews, leadership extended by the decision makers was poor, which also resulted in poor oversight during implementation.

\(^{13}\) Only about 7.5 percent of the work plan was under implementation and only 7.2 percent of the financing was expensed, while 27 percent of the implementation period elapsed since effectiveness.
resulted in implementation delays. Conceptual stage ideas that were identified had to be extensively elaborated to ensure that the consultancies were guided adequately to deliver quality outputs. These delays also negatively affected the procurement processes, as many of the outputs were to be produced through consultancies.

30. All three TTLs who managed the project from the side of the World Bank were international staff based in the country, and the majority of the task team members were also based in-country, which gave opportunity for the government team to interact and obtain guidance from the Bank. During the three-year implementation period, the design stage TTL moved out soon after effectiveness, the second TTL stayed on board for about one and a half years before he was promoted to a position in another location, and the last TTL arrived six months before closure. The Project Coordinator assigned from the Government changed once. While the presence of staff with international experience was beneficial for the project, such transitions translated into lengthier time to build an effective working relationship between the World Bank and the project team.

31. The structure of the project management was aligned with the existing Government structure, with the MoF leading the coordination and NRE agencies taking responsibility for implementation. The coordination and identification of linkages between the MoF and the three NRE agencies were significantly strengthened during implementation. Site visits, particularly to assess the functionality of District Mining Committees (DMCs), clearly demonstrated the improvements that were made to the processes and capacity. Adequate staffing to ensure project implementation in compliance with World Bank policies was provided. The decision not to extend the contract of the Procurement Specialist (PS) during the final year, which was key to the project implementation that was heavy on procurement actions, had some impact on the overall fiduciary performance (please refer to section 2.4 for details). There were challenges in the overall execution of the project that did not sufficiently separate project oversight from project implementation because the same officials were undertaking both functions. The TCC’s apex responsibility to take policy-level decisions and to ensure successful performance of the NREG program was not fully practiced. Most often the TA Project Coordinator chaired the TCC in the absence of the Chief Director of the MoF and not the co-chair (that is, the Chief Director, MLNR) as described in the PAD. As a result of this insufficient oversight by the senior officials, the project was not monitored closely, ensuring sustained successful project performance by timely addressing of implementation challenges.

32. Regular ISMs made efforts to address the above challenges. The ISMs were used to (a) assess the design improvements needed, (b) review the project risks and identify opportunities for adjustments in alignment with the desired project outcomes, and (c) assess the progress and constraints to effective and efficient implementation. Nevertheless, the actual implementation continued to be constrained as described earlier and reported in the procurement supervision reports and Aide Memoires. As a three-year project, a midterm review was not mandatory and therefore was not undertaken.

33. Some changes to the scope of activities were made during implementation. During the technical mission in September 2015 and second ISM in November 2015, decisions were made to focus on activities that could be expedited and drop some activities including (a) geo-data system from storage of exploration reports to interface with mining cadaster, (b) capacity building on project management-related monitoring and evaluation (M&E) under the MoF, and (c) costed
cleanup plans for mining contaminated sites. The allocations for these activities were redirected to acquiring equipment for Minerals Commission (MC) offices, to supplement the funding for the Forestry Sector Public Expenditure Review, and to accomplish complete cleanup of high-priority mining-contaminated sites respectively, hence further consolidating the impact of some of the activities. A new activity that had not been envisaged during preparation, that is, the preparation of the State of the Environment Report for Ghana, was added during the first ISM.

34. Although there was an implementation delay during the initial stages and number of project management challenges, the Government was successful in completing many useful and technically sound set of analytical works, as well as build capacity to better incorporate NRE in the planning process.

2.3 Monitoring and Evaluation (M&E) Design, Implementation, and Utilization

35. **M&E design.** A Results Framework and a detailed M&E mechanism were part of the PAD. There were two sets of PDO indicators as described earlier (please refer also to sections 1.2, 1.3, and 2.1).

36. The two sets of indicators for the PDO in the PAD made it challenging to assess the adequacy and relevance of the selected indicators to monitor and report on project results. However, the task team, in consultation with the Government, agreed on a single set of PDO indicators from the approved PAD once implementation commenced. In the process of selection, two outcome-oriented PDOs were changed. The indicator on “Climate Change Support and Impact Monitoring Disclosure System (CCSI-MDS) project database on mitigation and adaptation publicly accessible” was moved to the intermediate level, while the other on “Management Effectiveness Tracking Tool (METT) Score disintegrated by Forest Reserve” was fully dropped as the related activities in the sector could be better captured by the indicator on Forestry Master Plan.

37. The overall M&E system beyond the project performance indicators was intended to support the MoF to initiate the first step for the design of a robust and comprehensive M&E system for the NRE sector. Such an M&E system was considered critical for ensuring good monitoring of the reforms in the NRE sectors. It was also considered instrumental to adequately align national priorities with public resource allocation to the sector. Project design also intended to support the three NRE agencies to operationalize and roll out its managerial M&E systems.

38. The MoF, as the coordinating body for the project, was tasked with compiling the data collected and preparing and submitting reports on the progress toward achieving results to the TCC and the World Bank. The M&E reporting schedule was biannual as defined in the Financing Agreement.

39. **M&E implementation and utilization.** The project reported on the PDO indicators as agreed after the changes made in 2014. It also reported on the intermediate indicators defined under the updated Results Framework. The MoF coordinated the data collection and reporting. The monitoring responsibilities were carried out by the FC, MC and EPA utilizing their own staff. Data collection against the agreed results indicators was adequate. During the first ISM, an agreement was reached to increase the submission of progress against the agreed work plan from biannual to
quarterly because of implementation delays. Though reporting to the World Bank was sporadic and often delayed throughout the implementation period, it was accurate and did not impact implementation progress.

40. The project was unable to put in place the M&E system at the MoF, supported by improved sector statistics and the data development system needed for the revenue forecasting, due to budgetary constraints (Component 1). However, the NRE agencies confirmed that the data and information needed for the revenue forecasting model was generated through other analytical work that was carried out under the project, as well as data/information generated by the relevant NRE agencies. Conversely, the FC managed to set up an M&E system that would allow them to track the status of forest resources and revenue collection. The capacity developed for M&E in the FC will allow the MC to adopt and expand similar effort in the future.

2.4 Safeguard and Fiduciary Compliance

Safeguard Compliance

41. The project was designed to identify policy and management measures to preserve the NRE, which were considered to have positive environmental impacts. No physical interventions were supported by the project. It was appraised that the analytical work to be financed may have indirect impacts on land use, land ownership, and access to resources as a result of the implementation of policies and models that emerge from the TA.

42. Specifically, the impacts are as follows:

(a) It was envisioned that the benefit-sharing study will result in shifts in the benefit-sharing regime. These shifts were expected to be positive, moving from an arrangement in which the state owns trees (and resources accruing from them) to one in which ownership is spread more equitably and includes land owners, tree keepers, and land users.

(b) The review of Forest Management Plans under the capacity-building component may result in access restrictions to forest reserves, which may lead to loss of income (for example, collection of non-timber forest products) or restrictions of access.

43. Based on this assessment, the project was categorized as Environmental Category ‘B’ and the safeguard policies on Environmental Assessment (OP/BP 4.01) and Forests (OP/BP 4.36) were triggered. To address these impacts, detailed terms of references for the preparation of the analytical work were prepared and disclosed to the public during project preparation. These were appropriate and adequate based on the scope and types of interventions of the TA.

44. The majority of outputs that are relevant to safeguards were disclosed to the public through the implementing agency websites. These include the Ghana Forest Plantation Strategy 2016–2040, Forest Management Plans for the three forest reserves (Tinte Bepo, Yakombo, and Fure Headwaters), the Grievance Redress Mechanism Operational Manual, and the ASM Framework.

14 The FC depends on three main sources of income: (a) Consolidated Fund of the GoG; (b) Internally Generated Fund (through royalties and fees collected for services); and (c) income from external resources.
The Ghana Forestry Development Master Plan (FDMP) 2016–2036, the legislative proposals for tree tenure and benefit-sharing schemes and Alternative Livelihood Programs (ALPs) in mining communities were published.

45. Overall, project outputs were disclosed in the public domain as planned as part of the project’s safeguards approach. No safeguards issues were noted. Safeguards aspects of the Project are rated *Satisfactory*.

**Fiduciary Compliance**

46. **Procurement.** Procurement coordination among the implementing agencies challenged the project throughout its implementation, although the PS at the MoF exercised complete oversight. However, during the last year of the project, the PS was involved only part-time, resulting in weaker contract management and delays in the procurement information flow to the World Bank to provide timely guidance. The lack of details for timely preparation of procurement documents was owing to delays in providing technical specifications by the NRE agencies to the PS. There was also inadequate information on the contract implementation and the cash flow projection required for the execution of the contracts, against the respective procurements.

47. It was noted that all implementing agencies managed their contracts and were expected to report to the MoF. However, this process was not always efficiently managed. It was noted during ICR mission discussions that it was challenging for the World Bank to obtain details of the contracts execution and up-to-date information on all procurement activities at any given time. Contract administration/management and coordination challenges prompted the World Bank to reiterate to the project team the need to ensure proper contract management principles, adhere to the dictates of the respective contract documents, and improve monitoring and supervision. Records keeping and maintenance to reflect up-to-date information and filing was also reported as challenging, as the World Bank had to constantly remind the project on the need for proper filing of the minimum procurement documentation requirements of the World Bank to undertake post-reviews.

48. Despite the constant challenges, the various procurements were eventually completed and there were no violations recorded. As a result, the procurement performance of the project is rated *Moderately Satisfactory*.

49. **Financial management.** The MoF had a well-qualified and experienced Financial Management Specialist throughout the project period. There were adequate systems including competent staff within the Accounts Department of the MoF, as well as good internal control procedures including complete supporting documentation of all expenses to aid in verification and documentation. No ineligible expenditure or any other significant and persistent financial

15 Reasoning provided was that there were low volumes of procurement activities, although several contracts were ongoing.
management problems were reported during the implementation period. Therefore, the financial management performance is rated Satisfactory.16

2.5 Post-completion Operation/Next Phase

50. The transition arrangements for sustaining the project’s outcomes include the following:

- **Institutional.** The NREG implementing agencies in Ghana have adequate technical capacity both centrally and in decentralized offices to continue the implementation of key NREG actions in the future. However, the number of staff in the cadre may continue to be a challenge due to the civil service hiring freeze instituted in compliance with one of the conditions of the International Monetary Fund program and reported by the NRE agencies. The NRE agencies are ready to utilize the planning tools provided by the NREG TA to improve governance performance of natural resources sectors subject to adequate budgetary allocation and continuous capacity building, particularly field staff and local stakeholders.

- **Financial.** Due to its limited resources, the GoG may only be able to provide some financing for the implementation of NREG approaches developed by the TA and will require external funding for implementation on a wider geographical scale. The NRE agencies indicated a need for a successor operation to implement policy reforms, scale up gains, and commence implementation of the action plans. Considering that Ghana has recently held elections and a new Government is formed, early engagement would benefit the NRE agencies to continue the momentum and to ensure the outputs of the NREG TA are well utilized.

- The ongoing World Bank- and Africa Development Bank-supported projects under the Forest Investment Program (FIP) have a possibility of aligning their support to the outputs in the forestry sector augmented by the sector’s own retained revenue. Sustaining the mining sector will continue to have challenges unless a mechanism is adopted to better use the revenue streams to govern the sector.

- **Technical.** With the support of the NREG TA and other donor financing, the GoG is now endowed with necessary strategies and planning tools for the implementation of NREG policy reforms. Improved mechanisms still need to be designed to attract long-term financing and sustaining the NREG program.

3. Assessment of Outcomes

3.1 Relevance of Objectives, Design, and Implementation

51. **Relevance of Objectives.** The objective of the project was highly relevant, timely, and appropriate to the current needs of Ghana’s renewable and nonrenewable natural resource sector and the country’s transition to middle-income country status and its development pathway as

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16 The rating provided for financial management throughout the project except the first implementation support mission and related ISR was Moderately Satisfactory. Except for a reporting on a delayed submission of the interim unaudited financial report to the World Bank, there is not much information in the Aide Memoires or in ISRs.
defined by the Long-Term National Development Plan for Ghana (2018–2057). Improved capacity for NREG will bring about fiscal as well as environmental and social benefits and increase the resilience of natural resources and dependent communities to natural disasters and impacts of climate change. It is also consistent with Africa’s Climate Change Action Plan.

52. The project was developed during the implementation of the 2013–2016 CPS that recognized the importance of Ghana’s natural resource wealth for economic and social development, as well as key strategic actions to prevent impacts associated with natural resource extraction; these priorities were linked to the delivery of NREG TA. The World Bank’s support responded to the changing needs toward achieving the NREG through the incremental inclusion of capacity-building activities, strengthening of NRE planning and management, and adaptation to climate vulnerabilities.

53. **Relevance of Design.** The overall relevance of the design and implementation was substantial. Despite the shortcomings, the principles behind the design were in line with the GoG’s policies and legislation developed during the last decade for the NRE sector. Particularly, the support to the multisectoral approach identified by the GoG toward reducing the negative impacts of unsustainable extraction of natural resources, improving revenue generation, and promoting benefits sharing with communities. The principles that guided project design as described in the PAD are significant for sustaining future investments. The design had shortcomings, specifically with the M&E as presented earlier, which were improved to some extent during the early stage of project implementation.

54. The delays in implementation affected the full delivery of all intended results, but the outputs the project was able to deliver and related dialog with different stakeholders during implementation were relevant for the overall NREG objective. The core focus of the project and multisectoral implementation arrangements with MoF coordination remains highly relevant and appropriate in the country context.

3.2 Achievement of Project Development Objectives

55. The project is rated Substantial in relation to the achievement of the PDO, that is, to improve institutional capacity of key ministries, departments and agencies in natural resource and environmental management (please refer to section F - Results Framework under the Data Sheet and annex 2 - Project Outputs).

56. The assessment took account of the achievement of the project’s five PDO indicators (confirmed during implementation) and the related intermediate indicators. The overall achievement of project objectives is Substantial—two PDO indicators exceeded the targets (indicators 3 and 5), one PDO indicator met the target (indicator 4), two PDO indicators partially met the target (indicators 1 and 2), and all intermediate indicators met the targets. The positive

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17 The TA was designed to guide the Government on ways to address legal, regulatory and institutional bottlenecks in the NRE sectors as identified in the literature and on the recommendation of the DPO NREG series.
outcomes on the capacity of the targeted agencies to ensure better management of natural resources and the environment were demonstrated based on these achievements. One of the reasons for the successful achievement of the PDO, despite the project delay of 9 months after Board approval, was the efficient use of project management cost. The project managed to reduce the project management budget from 16 percent to 13 percent. Achievements in the PDO indicators as described below provide additional justification for the improved institutional capacity of key ministries, departments and agencies (MDAs) in natural resources and environmental management.

57. **Revenue forecasting model for the NRM sector in place and operational at the Ministry of Finance.** This indicator is substantially achieved and is expected to be fully achieved by 2018. The project supported further development and improvement of an existing review undertaken by the Real Sector Division of the MoF where an assessment of the capacity of the Government to adequately forecast the potential revenue from the forestry, mining, and oil and gas sectors were completed. The project was successful in developing the revenue forecasting model that will support the MoF to mainstream NRE management concerns into sector and macro-economic planning. The finalization of the model was delayed and therefore could not be included in the budget cycles of years 2 and 3 of the project as envisaged. The TA supported the establishment of streamlined institutional arrangements with clear designation of roles and responsibilities of different agencies and equipped the NRE agencies with necessary analytical tools to enhance efficiency in revenue forecasting. The MoF confirmed the model will be operationalized in the budget cycle of the new Government.

58. **Number of District Mining Committees established, trained and equipped.** This indicator was achieved above the target. A total of 24 DMCs were inaugurated, trained, and equipped exceeding the project target of 13 (from a baseline of 2). These are also fully operational. The setting up of DMCs with a broader set of stakeholders is a requirement identified in the Minerals and Mining Act and related regulations to ensure improved management of ASM at the district level. The targeted training on technical matters by the University of Mines and Technology (UMaT) of Ghana such as multisectoral policy requirements and processes, and equipping them with computers and printers to feed management information, produce minutes of meetings, and so on, were found to be useful to undertake the responsibilities of the DMCs. The use of UMaT will enable the MC to organize future refresher training to DMCs as needed. As part of strengthening the staff of the MC and EPA district offices, as well as ASM associations who play a critical role in the management of ASM, 115 individuals were trained on exploration, surveying, mining and processing techniques, book keeping, and policy and legal issues. The MC is currently working toward ensuring that the operating budget needed for long-term functioning of the DMCs is fully captured in the sector budget, as the revenue stream at the District Mining Offices is too low to sustain the operations.

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18 Revenue forecasting and capture are critical for both forestry and mining sectors. Comparatively, the FC is currently performing better in these aspects. With the full adoption of the revenue forecasting model and improved tax collection, as well as improvements to forest resources management, the FC has the capability to sustain its plans and operations. On the other hand, the MC will likely to have challenges to sustain its plans and operations based on the fluctuations noted on the annual internally generated funds. While declining market prices for gold has been attributed to this situation, to sustain the governance actions that were put in place, the MC will require a more innovative financing mechanism to be able to fully implement its mandates.
59. The ASM Framework, which was developed, consulted, and put in place, provides an implementation plan for short-, medium-, and long-term, indicative budgets to implement the plan and expected outputs and outcomes. It identifies responsibilities aimed at strengthening the capacity to manage this subsector in line with the operations of the DMCs. The framework adequately captures the incentives to formalize the subsector, the level of institutional collaboration necessary for the subsector’s effective governance, and how to address environmental and social impacts associated with the subsector. The use of this framework is now being demonstrated in some of the DMCs in operation and is expected to be expanded to the remaining DMCs. In support of reducing conflicts in mining communities, the GoG passed the regulation on compensation and resettlement. In addition, as part of the implementation of the framework, an amendment to the Minerals and Mining Act was made in 2015 with new provisions enabling the GoG to apply stringent actions to noncompliant mining operators. With improved capacity of District Mining Offices, there is reporting of significant improvement in the monitoring activities with the support of DMCs and reporting relating to illegal mining.

60. The project also supported the preparation of Corporate Social Responsibility (CSR) Guidelines to be adopted by mining companies for additional support to the affected communities through ALPs. Discussion with one of the mining companies confirmed that the guidelines are useful to improve their ongoing CSR activities. The MC is confident that it can now ensure that CSR activities are streamlined across all mining companies and monitor them better in the future.

61. **Forestry Development Master Plan revised and validated and related training on its implementation.** This indicator was substantially achieved. The FDMP is aimed at halting the country’s fast reducing forest resources and forming policies and programs to direct the forestry sector to make a better contribution to the country’s development. The project was successful in revising the FDMP (last updated in 1996) that moves the sector to better achieve development outcomes (timber and other services and better benefit sharing with stakeholders) and conservation outcomes (protection needs for environmental sustainability and regeneration). This was well consulted and validated with three regional consultations involving stakeholder representation and covering all regions of the country. It was also put through interministerial consultation and reviewed by the Parliamentary Select Committee. As the report was launched only in November 2016, there was inadequate time to provide training on its implementation before project closure. It was noted that the training on its implementation is part of the FC’s core service and the FC has the capability to undertake training in-house using its own resources.

62. In support of the implementation of the FDMP, the project also supported the preparation of Integrated Forest Management Plans for three priority reserves and finalization of the Ghana Forest Plantation Strategy\(^\text{19}\) and Tree Tenure and Benefit Sharing Framework. The legislative proposal for the Forest and Wildlife Policy was drafted and reviewed by experts and initial intersectoral consultation was held. Further consultation is required for validation before submitting the proposal to the Attorney General’s Office. There is an expectation of a paradigm shift from timber focus to multiple services in this new policy, which requires experience and significant investments for this change to materialize. The M&E system for the forestry sector has also been developed and validated, and staff of the three eco-zones\(^\text{20}\) were trained. The FC, in the

\(^\text{19}\) Major plantation establishment are expected to be supported under the FIP.

\(^\text{20}\) Three eco-zones in Ghana include the savannah, middle belt, and coastal belt.
future, plans on (a) directing its own revenue, (b) obtaining budgetary allocations from the Government, and (c) directing other ongoing and planned external resources to implement the FDMP and supportive regulations, strategies, and plans, adopt the M&E system to improve monitoring and reporting of the sector’s performance, and actively mobilize the Forest Forums established at national, regional, and district levels.

63. **Nationally Appropriate Mitigation Action Plan fully finalized (costed and time-bound).** This indicator was fully achieved. At the time of project commencement, Ghana had identified 55 NAMAs and recognized the necessity to prioritize to ensure their timely implementation. The project supported the completion of the prioritization processes already initiated by the EPA, including the assessment of potential climate change mitigation that can be achieved and related cost analysis. The project also provided assistance to detail out the NAMA for the charcoal industry to serve as a model to prepare NAMAs for other sectors.

64. The selection of the charcoal sector to model a detailed NAMA was highly appropriate because of its direct linkage to forest resources and environmental management. It was recognized that continued reliance on traditional biomass is no longer sustainable looking at the health and environmental pollution that comes with its exploitation. While the industry provides for nearly 440,000 full-time local employees and has a market value of US$70 million, it is considered as one of the major sources of greenhouse gas emissions in the country, particularly due to its contribution to deforestation/forest degradation and poor efficiency at the carbonization stage. This NAMA focused on the entire charcoal supply chain from feedstock production to carbonization to distribution and will adopt an approach that is expected to empower and incentivize the existing charcoal industry to adopt modern practices for responsible production and distribution of charcoal. The NAMA emphasized (a) the importance of community-based commercial woodlots plantations to be managed through a participatory resource management approach and (b) establishment of integrated charcoal businesses to act as growth poles to catalyze the modernization of the existing industry as well as spur growth through agglomeration and increased economic activities with forward linkages over time. The adoption of the NAMA, mobilizing both public and private resources to implement it, will help achieve NRE management outcomes of this sector, as a result of substantial emissions reductions, increased access to clean energy, reduced deforestation and land degradation, and improved taxation.

65. **Direct project beneficiaries including females.** Improving the knowledge and capacity of a wide variety of stakeholders was recognized as critical to achieve the NREG outcomes in Ghana, as well as consulting them to incorporate local knowledge and greater ownership of adopting NREG practices. The project targeted 1,000 people to benefit from the TA and was able to exceed the target with an achievement of 6,014 people, out of which 1,073 are females. This represents a six-fold increase over the target.

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21 There is a need to increase the efforts of awareness creation on illegal activities and accelerating law enforcement to avoid further losses due to illegal activities.

22 Forest Forums were established as part of the EU-supported Forest Law Enforcement, Governance, and Trade Action Plan.

23 Stakeholders of the project include staff of MLNR, FC, MC, MESTI, EPA, and MoF and individuals from local population of selected localities, private sector operators utilizing natural resources, CSOs, media, students, traditional authorities, district chief executives, district assembly members, Parliamentarians, and the general public.
66. Direct beneficiaries of institutional capacity building included 1,157; 805; 1,604; and 2,448 led by the MoF, MC, EPA, and FC, respectively. Targeted training undertaken for different sectors, both centrally and in decentralized units, and project management training for head office staff of abovementioned agencies were found to be appropriate and useful based on focused group discussions held with selected beneficiaries. Feedback from the supervisors on the knowledge gained and improvements made to the performance of their trained subordinates was positive. This was demonstrated through engagement of implementing agency staff, for example, in undertaking stakeholder consultations, interacting cross-sectorally to identify and develop linkages, and drafting (in some cases) and reviewing project technical documents that brought about on-the-job training. However, due to lack of post-evaluations of the trainings and post-training performance reviews of trained personnel, the actual impact of capacity building cannot be quantified.

67. Following are additional indicators that demonstrated the strengthened capacity of MDAs.

- **Guidelines on conduct of consultations with non-state actors** were developed through a consultative process to facilitate a framework for engaging non-state sectors and managing their inputs in NRE management into NREG processes. The guidelines were disseminated to all sectoral agencies and were disclosed to the public. The NRE agencies believe that these guidelines are now assisting them and other stakeholders to engage better by respecting and giving opportunity to voice the diverse concerns of particularly CSOs, while at the same time structuring their inputs in a way that can effectively inform the NREG processes.

- **Guidelines for local procurement by the mining industry** are helping the MC to ensure mining companies are adhering to the Local Content Regulations. Eleven mining companies submitted local procurement plans, which were verified by the MC, exceeding the target. In addition, the training manual was prepared to build capacity of local small and medium enterprises (SMEs) to supply goods and services to the mining companies. Using the manual, the MC has already completed training of 30 SMEs and sensitized 20 supply managers on the guidelines. The sensitization program has served as an avenue to discuss and identify products used by the mining companies which SMEs can supply locally.

- **Climate Change Support and Impact Monitoring Disclosure System (CCSI-MDS)**, which was designed and deployed by the project under the EPA, is providing the Government with a dashboard of climate change-related activities in Ghana. It is currently facilitating an effective coordination of all ongoing and planned activities.

- The project supported the **production and dissemination of the 2012/2013 Ghana Extractive Industries Transparency Initiative (GEITI) reports** improving the transparency in the flows of revenues coming from the country’s extractive industries. Over 2,000 people across the country, of which over 40 percent were females, were sensitized on the principles of GEITI and raised awareness on the benefits to Ghana from the extractive sector and other policy issues in the mining and oil and gas sectors.

68. There is additional qualitative evidence that the TA has improved the capacity of MDAs in NRE management. The multisectoral planning approach promoted under the project has
strengthened the linkages between NRE management agencies. It also led to better coordination among the three key sectoral agencies: the EPA, FC, and MC. It is unlikely that this institutional awareness and behavior would have been achieved in the absence of a binding factor such as the NREG TA. In addition, the improvements made by streamlining the planning processes of various sectors and their adoption will ultimately benefit the state and other entities that govern natural resources, the industries that depend on natural resources, and the population of Ghana as a whole.

### 3.3 Efficiency

69. Overall, the impacts described earlier were attained with modest efficiency. As a TA, it was not necessary to calculate an economic or a financial rate of return. However, the project took into account the economic and financial relevance of such operation by strengthening the Government’s capacity for revenue forecasting and tax recovery. Conversely, even an ex post cost-benefit analysis was not possible at this stage, as the revenue forecasting model is yet to be integrated into the GoG annual budgeting process, followed by actual tax recovery. Based on the good quality of the analytical work and capacity-building activities for the NRE agencies undertaken through the project, there is evidence that significant improvements were made to the efficiencies of natural resources (minerals and forestry) and environmental management. Substantial overachievement (600 percent) was noted in the delivery of trainings, which demonstrates the cost efficiency in conducting them.

70. Irrespective of a nine-month delay in commencing the actual implementation of the project, the project was completed in time with all of the analytical and physical outputs delivered as identified and within the changes agreed. Although not identified as direct contributors to the achievement of the PDO, but important for NREG, the project dropped the delivery of some outputs as a result of exchange rate loss between the special drawing right and U.S. dollar and cost overruns. There was no adequate time to commence implementation of plans developed by the project as a result of the implementation delays and time taken to redesign the scope of the outputs. The project disbursed 98 percent of the actually available funds (see annex 1). The project managed to bring down the project management cost from the original allocation of 16 percent of the grant to 13 percent. This cost also included capacity building provided to MDA staff and review workshops to disseminate the 2012/2013 GEITI reports. The use of existing staff in the MoF and NRE agencies to administer and manage the project was efficient in that it reduced the need for external hires and helped strengthen staff skills.

### 3.4 Justification of Overall Outcome Rating

Rating: Moderately Satisfactory

71. The overall outcome is rated Moderately Satisfactory on account of (a) high relevance of the project objective, (b) substantial relevance of the design and implementation, and (c) achievement of the identified PDO with substantial efficacy and modest efficiency. The project

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24 The development of the M&E system for the FC; putting in place grievance redress mechanisms by the EPA as well as natural resources benefit-sharing and revenue generation models; and improvements to policies, strategies, and legislation.
outcomes achieved are consistent with Ghana’s long-term vision and short- to medium-term development strategy as well as the World Bank’s CPS.

72. The relevance of the project outcomes and benefits to project beneficiaries was confirmed by the positive responses of the stakeholders interviewed during the ICR mission. The implementation of the project activities was financially reasonable, because most of the outputs identified at the time of project design were delivered supporting the outcome of the TA with some results indicators achieved efficiently above the targets.

3.5 Overarching Themes, Other Outcomes and Impacts

(a) Poverty Impacts, Gender Aspects, and Social Development

73. The project undertook an assessment to update the existing knowledge on ALPs in mining communities and to seek to identify new ALPs that will be attractive to the youth in particular and mechanisms to make them more sustainable. The study covered both males (54.5 percent) and females (45.5 percent) in the survey in all the three regions of the country. To make ALPs attractive to the youth, provision of adequate funding for ALPs, importance of participation in the design and implementation, and community ownership of ALP and skills development were identified as priorities. Taking forward these recommendations will have future poverty impacts and contribute to social development of mining communities. Capacity building in the form of training and awareness creation to the mining- and forest-dependent communities, as part of the project, provided them the opportunity to enhance their understanding of the governance mechanisms in place to sustainably undertake mining and forestry activities, while protecting the integrity of the environment. However, the reach was limited and therefore, the level of impact was not significant to demonstrate any possible changes to social development.

(b) Institutional Change/Strengthening

74. The project attained considerable results in relation to institutional change and strengthening because they were the core elements of the project’s intended outcome. The project’s overall focus was to ensure longer-term capacity and institutional development of the key implementing agencies.

(c) Other Unintended Outcomes and Impacts (positive or negative)

75. The preparation of the State of Environment Report for Ghana gave the country an opportunity to consolidate the findings of various reviews and studies supported by the project, as well as to provide a holistic account of critical issues on the environment that are of national and international relevance. It highlights the major drivers and factors that influence the environmental conditions of the country and the key issues relevant for environmental sustainability and identifies critical gaps in information that will inform additional research and further improve environmental reporting processes. The report is available in the EPA’s website and it is useful to increase awareness for achieving more sustainable and effective conservation.

25 The last State of Environment Report for Ghana was done in 2004.
3.6 Summary of Findings of Beneficiary Survey and/or Stakeholder Workshops

76. The project undertook stakeholder workshops to share the final outputs of the TA before project closure. The feedback from the workshops was very good and stakeholders expressed appreciation for the work done by the project.

4. Assessment of Risk to Development Outcome
Rating: Substantial

77. The risk to development outcome is rated Substantial because of risks associated with sustainability of project outcomes and supporting deliverables. This requires continuation of funding directed from the GoG budget, the MDAs’ own revenue streams, and external resources. It was noted that external resources can be leveraged only for well-defined and high-value initiatives and if the MDAs demonstrate adequate and continuous commitment to take forward actions identified through the NREG TA. The risk will remain significant if the MDAs are unable to demonstrate their ability to navigate political and operational environment, secure the sustainability of the investments made to the development outcome, and move the NREG program back into a multi-source programmatic approach.

5. Assessment of Bank and Borrower Performance

5.1 Bank Performance

(a) Bank Performance in Ensuring Quality at Entry
Rating: Moderately Unsatisfactory

78. The World Bank team anchored the design of the project based on lessons learned from the first DPO series and extensive analytical work that were already present on NREG. Preparation of the project took two years, as discussions with the Government on the modality of support to NREG were longer than anticipated. While considerable time was invested in overall preparation, there were (a) shortcomings in the technical design including the M&E framework, which significantly affected project implementation (see section 2.1 for details); (b) insufficient attention to specifying and defining the risks, which could have made both the World Bank and the Government pay adequate attention to instituting mitigation measures and improving planning and implementation; and (c) inadequate costing that resulted in some cost overruns. There was insufficient consultation and coordination with DPs although the NREG TA was part of a larger NREG program.

(b) Quality of Supervision
Rating: Moderately Satisfactory

79. Owing to lengthy discussions between the Government and the World Bank, on technical requirements to advance implementation, delays persisted from the start. This was further compounded by the change in TTLs, particularly at the commencement of implementation as a result of an inadequate hand-over process. The Bank assessed the design improvements needed, reviewed the project risks and identified opportunities for adjustments in alignment with the desired project outcomes.
80. The Bank was proactive in making changes to the scope of activities were made during implementation to focus on activities that could be expedited and drop some activities. The World Bank team’s efforts to improve the design to better align the implementation and introducing some improvements to M&E and reporting gradually increased in the adoption of solutions toward the abovementioned achievement of the project objective. The team fulfilled its supervisory duties, including regular supervision or technical missions during the implementation stage as the TTLs and majority of the team members were based in Ghana, which gave opportunity for the government team to interact and obtain guidance from the Bank. The team also provided technical advice from World Bank specialists on financial management and procurement issues, including regular expenditure and post-procurement reviews, and ensured compliance with environmental and social safeguard requirements.

(c) Justification of Rating for Overall Bank Performance
Rating: Moderately Satisfactory

81. The project had some shortcomings in preparation and design, which affected implementation. The World Bank team made constant efforts to address challenges of performance during the implementation, eventually succeeding in the delivery of the project’s intended results with modest shortcomings. The overall Bank Performance rating of Moderately Satisfactory is aligned with the project’s overall outcome rating.

5.2 Borrower Performance

(a) Government Performance
Rating: Moderately Unsatisfactory

82. The Government was committed to the NREG program based on the ongoing activities of the GoG and to partner with the World Bank to take forward the NREG dialog. However, these commitments were inconsistent during the project preparation and design and were not demonstrated during project implementation. The delay faced during project preparation was a result of the GoG being undecided on the modality of World Bank support. More oversight by higher-level officials at an MDA level or through the coordinating committee could have helped resolve challenges to implementation.

(b) Implementing Agency or Agencies Performance
Rating: Moderately Satisfactory

83. The implementing agencies (MoF, MC, FC, and EPA) provided the relevant staff to form the project team. However, they were not fully committed to implementation and timely resolution of issues that gave rise to significant delays in the delivery of project results. Procurement performance was mixed, and the procurement risk remained substantial throughout implementation. The fiduciary reviews did not find any significant deviations from agreed procedures or lack of necessary documentation. Safeguard compliance was maintained throughout the project. The M&E system was utilized. Reporting particularly on procurement aspects and
M&E was not timely. The implementing agencies managed to deliver the high-quality outputs (after revisions), although after delays in implementation.

(c) Justification of Rating for Overall Borrower Performance
Rating: Moderately Satisfactory

84. Despite the delays, at the time of project closure, the Government and implementing agencies had complied with most of the agreed requirements toward the PDO achievement. The overall counterpart rating of Moderately Satisfactory is aligned with the project’s overall outcome rating.

6. Lessons Learned

85. Staying engaged even during unfavorable fiscal situation provided benefits such as continuation of the important NREG dialog, as well as preparing the operational framework for future engagements. This project, with US$5 million and with a three-year implementation period, has successfully demonstrated this, as TA was the correct instrument under the circumstances.

86. The multisectoral approach adopted by the project proved to be an effective means of managing natural resources. The well-being of the environment and natural resources is fundamental to the long-term sustainability of many sectors. Hence, bringing practitioners from various sectors together, creating and enhancing synergies, promoting collective processes, and encouraging adaptation to joint decision making are the basis for a good governance mechanism. Although set up with very good intentions of bringing in the multisectoral approach needed for NREG, it was not very effective. The appointment of a stronger and independent multisectoral technical advisory team and its operations will ensure timely policy guidance and technical knowledge for implementing the program, resolve issues related to the operating environment, and push for stronger collaboration across sectors and DPs. The synergy created by such collaboration and cooperation would enable the Government to carry out related policy changes more effectively and use the limited external financial resources more judiciously.

87. The use of existing institutional structures for project implementation instead of creating a separate Project Management Unit is the way forward when implementing institutional capacity-building projects toward a common goal. The project largely benefitted from this arrangement. This approach is needed for NREG and encourages institutional enhancements after the project closure. However, identification and retaining of the core team of staff for technical expertise and project management for the entire project period and stronger leadership are prerequisites for any management modality to work effectively. Stability of the Government’s and the World Bank’s core teams and the depth/mutual trust of their engagement can have major advantages over time, especially when the operating environment can be challenging and the implementing period is short. Therefore, the two teams need to remain largely in place from concept through project initiation to closure with a strong commitment to the overarching objective of engagement, an excellent working relationship based on trust, and the benefit of institutional memory. It is recommended that this stability is built better to the extent possible through continued World Bank financial support until the sector can be fully independent both technically and financially.
7. Comments on Issues Raised by Borrower/Implementing Agencies/Partners

(a) Borrower/Implementing Agencies

88. The GoG provided comments on the draft ICR prepared by the World Bank. These included comments on procurement, government ownership and implementation arrangements. These comments were mostly accepted and incorporated in this version of the report. The Borrower also proposed a Government performance rating of Moderately Satisfactory for quality at entry, however given the challenges faced during preparation and early implementation which could have benefitted from higher level support, the Moderately Unsatisfactory rating has been maintained while recognizing the Government’s timely achievement of project development objectives. A summary of the Government’s final report is provided in Annex 4.

(b) Cofinanciers

89. There were no cofinanciers to this TA.

(c) Other Partners and Stakeholders

90. Not applicable.
### Annex 1. Project Costs and Financing

#### (a) Project Cost by Component (in US$ Million Equivalent)

<table>
<thead>
<tr>
<th>Components</th>
<th>Appraisal Estimate (US$, millions)</th>
<th>Actual (US$, millions)</th>
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<td>Component 2: Strengthening institutional capacity to support sustainable natural resources and environmental management</td>
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26 Annexes in the template that are not applicable to the ICR have been omitted from this document. These are: Economics and Financial Analysis, Beneficiary Survey Results and Stakeholder Workshop Report and Results.
Annex 2. Outputs by Component

Component 1: Supporting policy-making and knowledge management

1.1 Consultation guidelines for the Government of Ghana and Civil Society Organizations Engagement: Framework for Enhanced Engagement in the NRE Sector

- The GoG and CSOs engagement in NRE policy making, planning, implementation, and monitoring
- Assessment of the effectiveness of the present approach to citizens’ engagement in the NRE sector
- Review of the international best practices that inform the development of the Government and CSO engagement framework
- CSOs and GoG engagement framework
- Framework memorandum for the GoG and CSOs

1.2 Framework on tree tenure and benefit-sharing scheme

- Assessment of existing tree tenure and benefit-sharing mechanism
- Policy and legislative recommendations
- Provided critical inputs to the implementation of the FIP and the framework is expected to be piloted under the same program

1.3 Guidelines for local procurement in the mining sector

1.4 CCSI-MDS

1.5 2012/2013 reporting for the Extractive Industries Transparency Initiative

- Discrepancies in revenue inflow of the sector and recommendations for addressing the underlining issues that contribute to the discrepancies
- Dissemination of 2012/2013 reports to all stakeholders countrywide with public fora participated by over 2,000 people representing media, students, traditional authorities,
district chief executives, district assembly members, Parliamentarians, and the general public.

1.6 Public Expenditure Review of the forestry sector

- Demonstrated the need to balance the sustainability of forest revenue and related multifaceted changes necessary to achieve this balance
- Recommendations to revise the forecasting system in the FC to enable them to provide better forecast of expenditure and revenue and improvement of budgetary allocations and releases to continue its service effectively

1.7 FDMP

- Three consultative meetings covering all 10 regions in the country
- National validation workshop
- 20-year focused master plan that balances both consumptive and nonconsumptive values of the forest resources published and launched

1.8 Management Forestry Plans for selected reserves

- Three consultative workshops
- Three plans for Fure Headwaters, Tinte Bepo, and Yakombo Forest Reserves published and launched

1.9 Forest Plantation Development Assessment

- Three consultative workshops covering all 10 regions
- National validation workshop
- Forest Plantation Strategy for 2016–2040 published and launched consistent with the Policy Objective 2 of the Ghana Forest and Wildlife Policy

1.10 Legislative proposals for the Forest and Wildlife Policy

- Attorney general endorsed legislative proposals

1.11 Socioeconomic analysis of benefit-sharing arrangements

1.12 ASM Framework

- First phase of sensitization for the southern sector mining communities
• Establishment and operations of the Inter-Ministerial Task Force (led to arrest and deportation of about 6,000 foreigners engaged in illegal mining)

• Also, led to the amendment of the Minerals and Mining Act of 2015

1.13 Guidelines for local procurement by the mining industry based on the Local Content Regulations

• Training of 30 SMEs that supply goods and services to the mining companies

• Sensitization of the guidelines to 20 supply managers

1.14 Mining Sector Cost-Benefit Analysis

1.15 Benchmarking of Operating Costs for Exploration and Mining Operations

• Report on development of benchmark operating cost for exploration and mining operations in Ghana

1.16 Development of the Land Reclamation Plan for Old Mining Sites

• Reclamation/remediation plans for selected old mining sites with high risks of pollution in Tintokrom area of Amasie West District

1.17 Grievance Redress System

• A system for the EPA to formalize and restructure its processes for resolving public complaints

1.18 CCSI-MDS formulated, designed, and operationalized

1.19 NAMA

• The Sustainable Charcoal Value Chain NAMA Proposal to attract investments needed to broadly and effectively transform the sector

1.20 Discussion paper on the national framework on how to formulate and design the Natural Capital Accounting System for Ghana

1.21 Feasibility studies for the adoption of the System of Integrated Environmental and Economic Accounting Framework developed by the United Nations Statistics Commission

Component 2: Strengthening institutional capacity to support sustainable natural resources and environmental management

2.1 Revenue forecasting model for natural resources including the M&E system for the FC
2.2 Capacity building for forest management and forest planning in district offices

2.3 Strengthening of the MC, the MC district offices, and the EPA for managing ASM

- Training of total of 115 participants through UMaT including 20 from the MC, 21 from the EPA, 60 from the DMCs, and 14 from Ghana Association of Small-Scale Miners

2.4 Establishment of the gold assay laboratory

- Advisory services report to support the establishment of the Government reference laboratory at the Kotoka International Airport in Accra
- Fully equipped assay laboratory at the Kotoka International Airport in Accra

2.5 Capacity building for the decentralization of environmental management in Ghana

- Ten regional workshops to train 2,500 environmental officers

2.6 Advisory services for development of geo-database for storing exploration reports to interface with mining cadaster

2.7 Government delegation to climate change conference of parties


2.8 Review and update studies on ALPs in mining communities

- ALP strategy for artisanal mining in line with current issues in the sector and international best practices to resolve the issues

2.9 Strategic Environmental Assessment (SEA)

- Stakeholder consulted framework for the implementation of the Strategic Environmental Assessment as a policy instrument

2.10 State of the Environment Report

**Component 3: Project management and related capacity building**

3.1 Training of five staff of MDAs on project management, integrated financial management/strategy implementation, M&E, team building, and leadership

3.2 Review workshops to disseminate 2012/2013 EITI reports
Annex 3. Bank Lending and Implementation Support/Supervision Processes

(a) Task Team Members

<table>
<thead>
<tr>
<th>Names</th>
<th>Title</th>
<th>Unit</th>
<th>Responsibility/ Specialty</th>
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<tr>
<td><strong>Lending</strong></td>
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<tr>
<td>Flavio Chaves</td>
<td>NRM Specialist</td>
<td>AFTN3</td>
<td>TTL</td>
</tr>
<tr>
<td>Carole Megevand</td>
<td>Sr. NRM Specialist</td>
<td>AFTN3</td>
<td>Co-TTL</td>
</tr>
<tr>
<td>Kristina Svensson</td>
<td>Sr. Operations Officer</td>
<td>SEGMI</td>
<td>Mining Specialist</td>
</tr>
<tr>
<td>Angela Nyawina Kwaminwa</td>
<td>Sr. Social Development Specialist</td>
<td>AFTSC</td>
<td>Social Development Specialist/Social Safeguards</td>
</tr>
<tr>
<td>Timothy H. Brown</td>
<td>Sr. NRM Specialist</td>
<td>EASIS</td>
<td>NRM Specialist</td>
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<tr>
<td>Rachel Bernice Perks</td>
<td>Mining Specialist</td>
<td>SEG</td>
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<tr>
<td>Gary Joseph Raymond</td>
<td>Sr. Mining Specialist</td>
<td>SEG</td>
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<tr>
<td>Urvashi Narain</td>
<td>Sr. Environmental Economist</td>
<td>AES</td>
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<tr>
<td>Samuel Kwabena Nketiah</td>
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<td>Abdulai Darimani</td>
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<td>Ishmael Ayanore</td>
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<td>Suzanne Bouma</td>
<td>Consultant</td>
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<td>Stig Johansson</td>
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<td>Moses Yao Duphey</td>
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<td>Isabel Abreu</td>
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<td>Anders Jensen</td>
<td>Sr. Monitoring and Evaluation Specialist</td>
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<tr>
<td>Gerth Dieterle</td>
<td>Adviser</td>
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<tr>
<td>Edith Ruguru Mwenda</td>
<td>Sr. Counsel</td>
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<td>Country Lawyer</td>
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<td>Erik Winter Reed</td>
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<tr>
<td>Charity Boafo-Portuphy</td>
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<tr>
<td>Robert Wallace DeGraft-Hanson</td>
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<tr>
<td>Adu-Gyamfli Abunyewa</td>
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<tr>
<td>Luis M. Schwarz</td>
<td>Sr. Finance Officer</td>
<td>CTRLA</td>
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<tr>
<td>Matthieu Bonvoisin</td>
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<tr>
<td><strong>Supervision/ICR</strong></td>
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<tr>
<td>Martin Fodor</td>
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<td>TTL (up to 07/2016)</td>
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<tr>
<td>Asfarchew Abebe</td>
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<tr>
<td>Darshani da Silva</td>
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<td>Lesya Verheijen</td>
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<td>GGODR</td>
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<tr>
<td>Yesmeana Butler</td>
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<tr>
<td>Shigeko Asher</td>
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<td>Nevena Ilieva</td>
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<td>Gloria Malia Mahama</td>
<td>Social Development Specialist</td>
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<td>Charles Ashong</td>
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(b) Staff Time and Cost

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Annex 4. Summary of Borrower's ICR and/or Comments on Draft ICR

Summary of the Borrower’s ICR

Project Background

In 2008 Government of Ghana (GoG) decided to launch a 5-year Natural Resources and Environmental Governance (NREG) 2008-2012 program to address governance issues related to the mining and forestry sector and to improve environmental management with the overall objective of ensuring economic growth, poverty alleviation, increasing revenues and improving environmental protection.

The objectives of the program were to (a) ensure predictable and sustainable financing for the forest and wildlife sectors and effective forest law enforcement; (b) improve mining sector revenue collection, management, and transparency; (c) address social issues in forest and mining communities; and (d) mainstream environment into economic growth through Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA) and development of a climate change strategy.

The program was conceived as a platform for Sector Budget Support (SBS) with annual disbursements providing a predictable budget supplement or additional funding to each of the implementing MDAs. The support from a number of donors including the World Bank, the Royal Netherlands Embassy, DFID, European Commission, and the AFD was channeled through the Ministry of Finance in order to provide for synergy in tackling similar challenges in parallel natural resource sectors, and to address perceived weaknesses of previous interventions based on fragmented and donor-driven projects.

Under the NREG program, commitment from implementing agencies was very high. Government through the implementing agencies was able to achieve progress in undertaking several specific reforms, such as the finalization of the Forest and Wildlife Policy, drafting of the Climate Change strategy and Policy, the passage of six regulations to give effect to the Minerals and Mining Act of 2006, the establishment of the Multi-Agency Revenue Task Force, supporting the Ghana Extractive Industry Transparency Initiative in revenue reporting, strengthening of the institutional platform for sector dialogue and the conduct of Strategic Environmental Assessment (SEA) by the EPA in the Water and Sanitation, Transport, Mining, Tourism, Agricultural sectors and most recently SEA on the oil sector among others.

The NREG programme through its focus on the environmental governance and revenues was able to address dwindling natural resources and reduce the impact of the forestry and mining sector on the environment of Ghana in terms of deforestation, improved forest management and improved management of the mining sector.

However, sector challenges such as exploitation of the environment by both illegal mining and forest sector activities, addressing the remaining capacity gaps along the mining value chain, capacity gaps for mainstreaming climate change, monitoring the operations of the artisanal and small scale mining management of mineral resource data remain. In the forestry sector the need to address failures in the incentive framework to improve benefit-sharing and tree tenure schemes is also key.
Given the above challenges in 2013, the World Bank supported Government with USD$5million Technical Assistance (TA) Grant to strengthen institutional capacity of key Ministries and Agencies in the natural resource and environmental sectors. The support was needed to analytically drill deeper and unlock legal, regulatory and institutional bottlenecks in the Natural Resources and Environmental sectors to support the implementation of the NREG reform program. The Technical Assistance was also to support the overall NREG program, as well as other initiatives in the sector. It was aimed particularly at addressing the governance issues in the forestry and mining sectors and improving environmental management and to sustain Ghana’s Natural Resources and Environmental Governance program in achieving the desired policy reforms.

The project was approved by the World Bank in June 2013 and became effective in March 2014.

**Project Implementation Institutional Arrangements**

The NREG Secretariat at the Ministry of Finance (MoF) had the overall responsibility of the TA operation. It was in charge of coordinating with the various entities involved in the NREG program, namely the Ministry of Lands and Natural Resources (MLNR), Minerals Commission (MC), the Forestry Commission (FC), the Ministry of Environment and the Ministry of Science, Technology and Innovation (MESTI) and the Environmental Protection Agency (EPA). The MoF, in close consultation with the other agencies, was responsible for project planning, monitoring, evaluation and inter-sectoral coordination. The technical aspects of implementation were however, managed by the respective implementing agencies.

The NREG TCC, established in 2007 to manage the technical and operational aspects of the NREG Sector Budget Support Program, acts as the Steering Committee for the TA operation. The TCC is chaired by the Chief Director of the Ministry of Finance (MoF) or its representative and consists of the Technical focal persons of the NREG MDAs.

The Technical Coordination Committee has generally functioned well during the implementation of the NREGTA. Vertical linkages between MoF and the three NRE agencies have been significantly strengthened during project implementation which has greatly enhanced results delivery.

**Project Components**

The project has three components:

- Component I of NREG focused on supporting policy-making and knowledge management.
- Component II aimed to strengthen institutional capacity to support sustainable natural resources and environmental management; allowing key agencies to effectively deliver key services, whilst
- Component III is on monitoring & evaluation of the project.

**Project Performance and Achievement**
The NREGTA has largely achieved its objectives it was designed to achieve. It has contributed to the natural resources and the environment reform agenda through the provision of targeted and cutting edge analytical work as well as through capacity building of the institutions in charge of implementing the reforms. At the time of project closure all the PDO result indicators were achieved.

- **The revenue forecasting model for the NRM sector is in place and operational at the NREG MDAs and at the Ministry of Finance.** The models have been deployed to support the forecasting capacity of the MDAs. The agencies were also trained to use the Models. It has indeed enhanced the institutional capacity of the NREG MDAs in revenue forecasting. The NREG Agencies are now equipped with the necessary analytical tools to improve their performance in relation to this area of their activities.

- **Forestry Development Master Plan revised and validated, and related training on its implementation provided.** The review and revision addressed many changes in the sector over the past 16 years, including a new Forest and Wildlife Policy (2012) adopted to respond to the new challenges in this area. The revised FDMP will guide the implementation of the Forest and Wildlife Policy. The new FDMP was designed specifically to focus on the participation of communities in forest management (timber as well as non-timber products) and on the contribution of forests to rural livelihood.

- **In the mining sector thirty (30) District Mining Communities have been formed out of which twenty-four (24) have been established, inaugurated, trained and equipped.** This was to strengthen the capacity of the Minerals Commission to manage artisanal and small scale mining at the local level. Training modules were developed and implemented and equipment such as cameras, differential GPS, and computers were procured for existing MC district offices. The Head Office has been equipped with Total Station Survey equipment to assist in conflict resolution in the field each time they occur. The training did not only include district mining committees, but also included, a broader set of stakeholders, such as District Assembly representative, miners, civil society organizations, local law enforcement, and EPA staff.

- **The Nationally Appropriate Mitigation Action Plan was fully finalized (costed and time bound).** Based on the prioritization exercise, the TA has supported the development of charcoal sector NAMA. It was expected to serve as a model for other sectors to use as a basis for further development, in some cases with the active involvement of the private sector to develop a plan with solid financing.

The activities undertaken under the project namely, development natural resources revenue forecasting; forestry sector public expenditure review; production and dissemination of Ghana EITI reports; socio economic analysis of benefit sharing; capacity building for forest and wildlife management plans; capacity building for decentralization of environmental management; strengthening of EPA’s district offices for environmental management including ASM impacts; Development of ASM strategic management framework; benchmarking of operational costs for mining exploration and mine operations; the establishment of a framework for building a national natural capital accounting system; and above all a strategic natural resources and environment sector study that among others identifies and assesses the condition and state of Ghana’s
environment, as well as emerging issues that need to be critically considered and addressed in the country; are all geared towards improvement of policies, development of technical tools and skills and strengthening the institutional capacities of the NREGTA MDAs to sustain the NREG program in achieving the desired policy reforms and results. Institutional and community capacity building are key building blocks towards sustainability.

According to the fourth ISM, December 2016, the project was able to support actions and collaboration between ministries and agencies which otherwise may not have happened. It must be mentioned that the quality of analytical works delivered by consultants under the project were excellent. Procurement of goods and the acquisition of Consultancy Services were based on Bank rules and procedures. The Project also prepared and submitted three (3) annual audit reports for the Bank's review and approval. Key recommendations from external audit reports were complied with. Disbursement procedures also followed provisions in the Bank's Disbursement Handbook. The project implemented recommendations in Bank Supervision Aide Memoires and accompanying Action Plans that were developed. The PCU regularly updated the Bank on the status of project implementation.

The World Bank has been consistent in its supervision missions over the project period and proactively addressed challenges encountered during project implementation. The PCU of the Ministry of Finance has also been very particular in the scrutiny of the expenditure returns submitted by the implementing agencies.

The project has been very beneficial to the target group. The direct beneficiaries of the operation are the Ministries, Departments and Agencies (MDA) in charge of natural resources and environmental management, namely: the Ministry of Lands and Natural Resources (MLNR), including its specialized commissions, the Forestry Commission (FC) and the Minerals Commission (MC), the Ministry of Environment, Science, Technology and Innovation (MESTI) along with its specialized agency the Environmental Protection Agency (EPA), and the Ministry of Finance (MoF). The project was targeted to benefit one thousand (1000) people but as at the project closure more than six thousand and fourteen (6,014) people have so far benefited from the project directly and indirectly.

The dissemination, capacity building and consultation workshops benefited other stakeholders, including the local population, private sector operators, civil society organizations, the media, students, traditional authorities, District Chief Executives, District Assembly members, Parliamentarians, development partners and the general public have indirectly benefit from the TA operation through the analytical work and institutional developments to be supported in key areas in the forestry, mining and environment sectors.

The commitment of the NREGTA implementing Agencies to the project implementation and to achieve project goals positively affected implementation and delivery. All the agencies implementing the NREGTA project have been committed to the project since its inception especially with the understanding that it was an interim phase of the Bank’s engagement with the sector, and its successful implementation will therefore be the platform that will help to conceptualize and prepare eventual interventions or leverage future support for the sector. It was for this reason that the MDAs felt empowered and were very enthusiastic about the project and therefore worked very hard to ensure success despite the challenges they faced. The existing
Project coordinating mechanisms were key in ensuring government commitment, ownership and success.

Project implementation also benefited from the cooperation of critical stakeholders especially Civil Society Organizations, NGOs and the private sector in ensuring achievement project objectives. All the analytical works and consultancies that required the inputs from CSO and other stakeholders were successfully executed. For instance, the development of Guidelines for GOG and CSOs Consultation was consultative and received significant inputs from CSOs across the country. So also were other sector documents such as the Forestry Development Master Plan, Ghana Forest Plantation Strategy, Artisanal and Small Scale Mining (ASM) Framework and the production and dissemination of the Ghana EITI Reports. The EITI reports which published data on national and subnational mining and oil and gas revenues was effectively disseminated to impacted communities. The stakeholder involvement approach to the implementation of the NREGTA has contributed to increased ownership of stakeholders regarding policies and strategies, which will support the implementation of policies and strategies in a more sustainable way.

**Key Lessons Learnt**

Key lessons learnt include the following:

- Commitment of Government and the project implementing agencies was the key factor responsible for the successful implementation of the project.

- The existence of the NREG TA created a platform that enabled the sectors to complete significant programs which were started during the NREG Phase II and fostered a close collaboration amongst the various ENR Sector institutions for effective environmental governance. Without the project, it was unlikely that these institutions would have collaborated on their own.

- Most of the project activities were under budgeted, resulting in cost overruns in most cases, which created financial challenges for the project. Currency Exchange Risk also affected the smooth implementation of the projects as funds were unavailable to carry out some aspects of the project which eventually had to be funded by the GoG. Though most the activities were delivered cost effectively, better costing of project activities and providing for contingencies would have been very helpful in containing project cost.

- The long period of project preparation through project effectiveness affected project activities such as TORs, which became outdated and needed to be rewritten. This is probably also the reason for the lower cost estimates mentioned above as they may not have been updated over time. A shorter project preparation time would have helped avoid such problems.

- The turnaround time for the Bank’s staff to review and comment on TORs was long. This led to delays in receiving “No objections” for Terms of Reference (TOR) from the Bank. This difficulty hampered the smooth running of the project. It is important that the Bank looks at how long it takes for the ToRs to be evaluated, and where possible provide for an automatic “No Objection” should approvals delay beyond a certain agreed deadline, the
number of people who evaluate and approve the TORs, and the importance of putting country policy priorities first, since this affects the timing and delivery of the project.

- Procurement was a major challenge for the project. Procurement capacity should have been beefed up at the PCU and some form of training should have been organized to the implementing Agencies and MOF on procurement prior to the start-up of the project.

- High turnover of Task Team Leaders (TTL) affected the smooth implementation of the program.

**Bank Performance**

The overall Bank performance is moderately satisfactory. The Bank is commended for having delivered the NREGTA Project despite all the challenges with the project preparation and design. Though the PDO was well defined the indicators were poorly defined. The project could have, however, benefited more from timely delivery. The project preparation started somewhere in 2011 but was delivered in 2013 but became effective in 2014.

A number of sector issues and challenges which were identified and discussed during the project preparation unfortunately did not find their way into the Appraisal Document because the funding available to the project was limited. It was hoped that the Bank could bring on board other donors already engaged in the sector to contribute to the TA to enable the NREG Agencies fully implement all their activities but this did not materialize. This situation was further compounded by the fluctuating SDR leading to reduction in the available funds for project implementation. As a result, the agencies had to scale back on some of their activities or look for GoG funding because of lack of funds.

The first change in the Task Team Leader (TTL) for the project was not very helpful. The departure of the TTL who led the project design and preparation adversely affected project implementation. The new project TTL struggled to understand the project and to appreciate its importance and this also resulted in the delays in the approval of TORs and hence project implementation and delivery.

The Bank’s central role in the whole NREG Program was very much appreciated by GOG but the failure of the Bank to accompany the TA with Development Policy Operations (DPOs) was a major setback for the project. The DPO would have dovetailed into the outcomes of the TA and the gap we are currently experiencing on completion of the TA would have been avoided. The NREGTA was originally planned to complement a sector budget support or the DPOs to further deepen the policy reform programs begun by the sectors during the phase one of the NREG and help transform impacts on the ground. It was also expected to help identify methods and tools, and suitable institutional arrangements to help the MDAs better embed the reforms in their development programs to improve sustainability and foster impacts. Unfortunately, the Bank’s DPOs never materialized, and the Bank provided no reason for the discontinuation of the DPO. In absence of the DPOs the TA may not lead to the deepening of the expected reforms.

The Government of Ghana and the NREG MDAs urge the World Bank to work towards putting in place a future NREG Sector Budget Support or an investment operation to implement policy reforms and scale up gains as well as start implementation of some of the program documents
prepared by the project (such as the Forestry Sector Master Plan, the ASM Framework, the charcoal NAMA, etc.) if TA is to be meaningful. This has to be done as quickly as possible so as not to allow the effluxion of time to make recommendations made in the various reports under the TA outdated and therefore make their implementability in their current state doubtful.

The quality of the Bank’s supervision was quite high. The project implementation support missions were very helpful in resolving most of the project implementation challenges and thereby keeping project implementation on track. The pace and frequency of supervision missions helped to update the work plan, revise the results framework, and give advice at various stages of project implementation. The supervision missions therefore had the requisite capacity and expertise to address key challenges and proffered solutions to address implementation bottlenecks. Procurement, disbursement and financial management (audit of project accounts) were thoroughly reviewed and duly approved by the Bank. Bank task managers also ensured project compliance with rules and procedures, and key action plans that were agreed upon.

The rating for the Bank for ensuring the quality at entry and quality of supervision performance was therefore moderately satisfactory.

**NREG TA Way Forward**

Overall, NREGTA and the NREG DPO series have enabled the three key MDAs (Forestry Commission, Minerals Commission, and the Environmental Protection Agency) and their Ministries to revise and update existing legislation, leading to an improved and more coherent regulatory framework. However, there are still weaknesses within the legal framework in ensuring that there is a proper balance between the long-term conservation and sustainable use of natural resources and pressures to maximize profits, particularly, weaknesses remain in governance roles and responsibilities of stakeholders operating in natural resources and environment sectors, which in turn are leading to inadequate and poor enforcement of environmental regulations and laws, providing opportunities for unchecked exploitation of Ghana’s natural resources base and environment.

It is proposed that GOG should engage with the World Bank for a follow-up on a successor program to the NREGTA. The following areas are recommended for future World Bank and other Development Partners support:

**Ministry of Finance**

*Strengthening EITI implementation across the ENR Sector:* Ghana is EITI compliant country and had undergone a second successful validation in 2016. Ghana has also won an international award for implementing the recommendations from its EITI reports. It has implemented the EITI in the mining, oil and gas sectors and developed a comprehensive road map for implementing it in the forestry sector. The country’s EITI reports cover the whole extractive sector value chain from the award of licenses and contracts through regulation and monitoring of operations, collection of taxes and royalties, distribution of revenues, and the use of those revenues to support sustainable development policies and projects.

EITI has grown in scope since 2003 when it was first introduced. It has expanded its initial narrow focus on revenue transparency to focus on the entire value chain of the extractive sector. The EITI
is spreading its focus to cover more areas in the extractive sector such as commodity trading and beneficial ownership. Ghana is one of the countries selected to pilot the implementation of the commodity trading initiative, which focuses on disclosure of the sales of the state’s share of production and other ‘in-kind’ revenues from oil and gas and mining. Ghana is also implementing a beneficial ownership regime which will also help identify the real persons behind companies that come to do business in the extractive sectors in Ghana apart from publicly listed companies. So the support to deepen the EITI implementation along the whole natural resources and environment value chain in Ghana will be key going forward. Transparency and promoting demand for good governance is a critical theme across the whole natural resources and the environment sector and the role of the EITI is critical.

Sub-national EITI implementation needs further strengthening through the implementation of the Minerals Development Fund Act, 2016 and the accompanying Guidelines on the Use of Mineral Revenues to enhance transparency and accountability.

Environment

*Environmental Management:* The EPA has made considerable progress towards mainstreaming the SEA in its activities but capacity remains weak for effective monitoring and enforcement of compliance with environmental regulations and management plans developed under environmental assessment procedures. Ample potential exists for strengthening these systems, including the development of routine environmental standards (e.g. for effluent quality), review of fees and fines structures based on sound understanding of costs of both environmental impacts and mitigation, and developing systematic monitoring systems.

The MESTI and the EPA are particularly interested in developing innovative ways to involve wide range stakeholder participation, through initiatives such as AKOBEN (an environmental rating and disclosure system designed to put public pressure on firms to improve performance) and developing the capacity of financial institutions to understand the environmental responsibilities and liabilities of their clients.

*Wealth Accounting and the Valuation of Ecosystem Services (WAVES):* Though Ghana is not a WAVES implementing country, various attempts have been made since 2000 to date, to mainstream environment into national development planning strategy in line with the country’s commitment to pursue sustainable development as well as achieve the targets of the millennium development goals. Despite these efforts, environment and natural resources considerations have not been adequately incorporated in national income accounting framework of the country.

Environment and natural resources stakeholders believe that putting Natural Capital Accounting Framework in place would better inform strategic decision making in contrast with the already existing System of National Accounts (SNA) which can be misleading as it does not fully take environmental considerations into account. Ghana needs a full blown WAVES Program for the establishment of the National Natural Resources Capital Accounting Framework for Ghana.

The WAVES program will complement the EITI, together the EITI and wealth accounting will provide a way to monitor whether the extractive sector does, in fact, contribute to long-term development. The EITI is about promoting transparency and accountability within the extractive sector.
sector in ways that support strong development impact in the country and extractive communities. The EITI ensures that wealth is harnessed for sustainable development.

The EITI introduces transparency and foster accountability for extractives–related processes, and wealth accounts provide a tool to monitor the economic consequences, that is wealth creation and the transformation of natural capital into other forms of wealth. Without transparency in wealth transformation and creation, the conditions for long-term sustainable development – accountability in resource-rich countries may not be considered complete.

**Minerals Commission**

The Minerals Commission has shown strong commitment to improving management of mineral resources through policy changes, including revisions to the fiscal regime,\(^{27}\) drafting of regulations and guidelines, and strengthening of human resource capacities.

Below are the actions and the activities required to implement the recommendations from the implementation of the NREGTA.

**Development of Geo-database for storing exploration reports to interface with mining Cadaster:**

The geo-database will be used to store mineral related information to interface with the mining cadaster. This would also allow classification and electronic storage of these reports and maps to make geological information easily accessible to exploration companies in order to enhance the attraction to Ghana as an investment destination in the face of global competition for limited exploration funds worldwide. The database would also enable companies make tremendous savings on costs and time which otherwise would be incurred in carrying out new exploration work over areas previously investigated.

According to the recommendation in the report of the Geodatabase studies carried out under the NREGTA, it would take the Minerals Commission about US$2.7 million to implement the recommended geodatabase system. The system will involve among others, creation of the geodatabase and electronic document management system to interface with the mining cadaster.

**Management of ASM [Implementation of ASM Framework]:** Artisanal and Small Scale Mining issues have become a national issue which is of grave concern to Government. The various gains achieved in the minerals and mining sector is being shadowed by the massive environmental degradation caused by illegal small scale miners. The degradation has immense negative impact on water bodies, flora and fauna. Under the NREGTA, an ASM Framework with an Action Plan was developed through broad stakeholder nationwide consultations for implementation.

What needs to be done is to implement in its entirety, the action plans outlined in the ASM framework. What is required in this case is a Development of Policy Operations with support of Development Partners to implement recommendations. Some of the key activities in the framework are described below:

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\(^{27}\) Initial revision to Mining Act, Act 794 in March 2010 changes royalty rate from sliding scale 3-6% to a fixed 5%, further changes in November 2011 increasing CIT from 25-35%, changes to amortization, among other changes.
Decentralization of MC District Offices to Manage ASM: Currently the MC has nine (9) District Offices in the country to manage ASM activities. Clearly this is inadequate given the wide geographical coverage which makes them ineffective. The Commission is making efforts to establish additional offices to bring services closer to ASMs since the artisanal and small scale mining issues should be best solved at the local level. Currently some regions do not have District offices of the Commission and in order to bring our services closer to the small scale miners, the Commission needs to create at least twenty (20) more District Offices. Logistics needed include; vehicles, office and field surveying equipment, office accommodation, training etc.

Geological Investigation of Areas for Small Scale Miners: One key criteria for designating areas for ASMs is its favorable geological and mineralization potential. Currently about 150 areas have been designated for ASMs, however there is the need to conduct detailed investigation of these areas to delineate economic areas for ASMs. This activity would be a key criterion to reduce the wanton degradation of areas by illegal miners. Under the NREG (DPO), only nine (9) of these areas were explored and those that proved positive were demarcated to small scale miners. The Commission has blocked out 150 areas designated for small scale mining. What is required is a support to find areas geologically suitable for small scale miners.

Strengthening the District Mining Committees and ASM Associations: Under the Minerals and Mining Act, the DMCs and ASM associations have been identified as key stakeholders to assist the District offices of MC to effectively manage issues of small scale mining at the local level. Thus, there is the need to provide logistics such as; vehicles, use of technology such as drones among others to monitor operations of ASMs (both legal and illegal) at the local level.

What is required is to build the capacity of the District Mining Committees (DMCs), the District Officers of the Minerals Commission and the National Association of Small Scale Miners to enable them deal with small scale mining issues at the local level.

Remediation of Highly Polluted Mine Sites by Illegal Miners: There is the need to leverage and coordinate with other potentially available funding to enable a complete clean-up of mined out areas contaminated with chemicals based on the costed remediation plan of sites prepared under the NREGTA.

Originally, approximately US$0.5 million was expected to be mobilized under the already-approved Mid-Size Global Environmental Facility (GEF) Project, managed by the World Bank, for detailed clean up engineering design and early implementation. Based on the preliminary consultation with GEF, approximately US$9-10 million for complete clean-up will be sought from the GEF Chemicals and Waste window (incremental to Ghana GEF STAR allocation) in the form of a full-size regional GEF Project.

Cost Benefit Analysis of the Minerals and Mining Sector 28: It is highly recommended, that Ghana develops a large and detailed Cost-Benefit-Analysis of the extractive industry. A more detailed understanding of the cost-distribution and benefit-streams of the sector in the country would possibly provide a base for improved policies towards more sustainable use of natural/mineral resources.

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28 Recommendation from the Final EU NREG Evaluation Report
**Implementation of activities under the Minerals and Mining Policy:** For the first time in Ghana a comprehensive document which harnesses the various policies in the minerals and mining sector have been developed. An implementation plan is being developed and it would be important to secure adequate funding to carry out the various plans and activities that need to be implemented.

**Diversification of the mineral production base of the country:** Effectively Ghana operates a mono-mineral economy with gold accounting for about 95% of mineral revenues. The mineral and mining sector is also the largest foreign exchange earner for the economy. Therefore, in times of low gold prices, the economy suffers and from the EU intervention in the mineral and mining sector under a Mining Sector Support Programme, discoveries of base metals have been made. It is important that further work is carried out geologically to establish with confidence the existence of these base metals in economic quantities.

**Industrial Minerals Development (Development Minerals):** It is important the country develops its development minerals to add value to the local economy. Further assistance will be required in the development of these industrial minerals.

**Development of Alternative Livelihood Programs in Mining Communities:** The current alternative livelihood programs being undertaken by Government is based on 2001 World Bank Project. The NREGTA has updated this study and the recommendations need to be implemented. It would necessary to implement the recommendations in the updated study in the various mining communities.

**Linking FIP with the mining sector:** Illegal mining activities affect both flora and fauna due to the land degradation that accompanies the activity. In addition, it chemically contaminates the environment where chemicals are used. It is important therefore to integrate mining issues into the FIP program currently underway.

**Make the Inter-Agency Mineral Revenue Task Force fully operational** to ensure that mining companies comply with their financial obligations under the law to the state.

**Forestry Sector**

Below are highlights of proposed future interventions for the forestry sector which requires financial and technical support from development partners.

- Creating public and institutional awareness on the Forest and Wildlife Policy, 2012 directions and roles and responsibilities of all stakeholders.

- Consultations and development of recommended legislative reforms to support the implementation of the Forest and Wildlife Policy.

- Implementation of the Forestry Development Master Plan: The Master Plan is the blueprint for sustainable forest management in Ghana from 2016-2036 and it provides a list of interventions to be implemented in phases with the participation of non-state actors.
• Implementation of the Ghana Forest Plantation Strategy including the development of a Legislative Instrument to create an enabling environment to facilitate private, community and public investment in plantations.

• Implementation of the developed 3 model Integrated Forest Management Plans and further develop Integrated Model Management Plans for other Forest Reserves.

• Roll–out implementation of selected options of the Tree Tenure and Benefit Sharing Scheme in non-FIP (Forest Investment Program) regions across the country. Selected options will first be piloted under the FIP.

• Implementation of the recommendations of the Studies on Schemes for Payment for Ecosystem Services (PES): Studies is being conducted on this under the Forest Investment Program.

• The future planning requires a stronger focus on and commitment to additional resource establishment, adequate maintenance of existing resources and investment in innovative PES mechanisms.

• Government intends to build on the progress made over the past few years and specifically target the long standing issues necessary to promote sustainable and equitable management of the forest resources in Ghana, namely: appropriate incentives framework to foster sustainable forest management, with a specific focus on plantation promotion as well as key forest reserves.

Conclusion

There is the consensus that the NREG Program has been game-changing in increasing government ownership of donor support. It has stimulated interactions at a high political level and contributed to improving political engagement and cross-sectoral exchanges on environmental policy relating to the management of natural resources. Overall, we consider the interventions from the Technical Assistance support to have addressed some of the very critical issues bedeviling the NRE sector and thus was a very important input. While the Technical Assistance interventions have not put to bed all the complex intricacies within the natural resources and the environmental sector such as the issues of climate change, tree tenure arrangements in Ghana, illegal mining and logging etc., for example, it did open up the space and provided the necessary framework for largely resolving the associated hydra-headed problems.

The NREG TA afforded relevant state institutions in the NRE sector and civil society stakeholders alike, the opportunity to focus efforts on addressing challenges in the NRE sector in a coordinated and holistic manner. The program design, which included a Government-CSOs engagement framework helped in streamlining citizens input into major policy decisions, and encouraged CSOs to play their monitoring and evaluation role effectively, especially through their annual CSO parallel review of the NRE sector, and feeding their report into deliberations at the government-led review of the sector.
NREGTA directly facilitated the improvement in sector policies, strategies, laws and regulations, capacities of the implementing agencies, procedures, monitoring and control mechanisms and improved service delivery for the formal sector. More was achieved in respect of policy development at the technical level than at the political level. The NREGTA supported activities which significantly contributed to the improvement of quality of policy processes, ownership and transparency in all the sectors.
Annex 5. Comments of Cofinanciers and Other Partners/Stakeholders

The project did not have Cofinanciers.
Annex 6. List of Supporting Documents

1. Africa Mining Vision February 2009


5. Financing Agreement Grant No. H851-GH

6. ISRs Sequence Numbers 1–7

7. Minerals and Mining Policy of Ghana November 2014

8. NREG Concept Review Minutes, February 13, 2012


10. Project reports

   - Building a Natural Capital Accounting System in Ghana, Workshop Report, April 2016
   - Capacity Building for the Decentralization of Environmental Management in Ghana, September 2016
   - Charcoal NAMA (ISBN: 978-9988-24492-7)
   - Consultancy for Advisory Services to Support Development of Geo-database for Storage of Exploration Reports to Interface with Mining Cadaster, August 2016
   - Consultancy for Advisory Services to Support the Establishment of Government Reference Laboratory at the Kotoka International Airport in Accra, April 2016
   - Consultancy Service for Review and Update studies on Alternative Livelihood Programs in Mining Communities, June 2016
   - Consultancy Service to Upgrade and Improve the Architectural Design of Existing GHG Database to include Climate Action, their Effects, support received and deploy new Online Database for the EPA

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29 Month and year of documents are provided only when the date is available in the document.

• Development of Benchmark Operating Cost for Exploration and Mining Operations in Ghana, August 2016


• Framework on Tree Tenure and Benefit Sharing Scheme (Legal Reform Proposals), June 2016

• Fure Headwaters Forest Reserve Management Plan

• Ghana Forest Plantation Strategy 2016–2014

• Ghana Forestry Development Master Plan 2016–2036

• Ghana Natural Resource Revenue Forecasting Model

• Grievance Redressal Mechanism (ISBN: 978-998-24491-0)

• Legislative Proposals for the Implementation of 2012 Forest and Wildlife Policy, May 2016

• Monitoring and Evaluation System for the Forestry Sector under the NREG, June 2016

• Natural Capital Accounting (ISBN: 978-9988-24488-0)

• Operationalization of Implementation Framework for Strategic Environmental Assessment Practice in Ghana, April 2016

• Public Expenditure Review of the Forestry Sector, November 2015

• Reclamation/Remediation Plans for Selected Old Mining Sites with High Risks of Pollution in the Tontokrom Area of Amansie West District, December 2016


• Strategic Environmental Assessment (ISBN: 978-9988-244934)

• The State of the Environment Ghana 2016, December 2016

• Tinte Bepo Forest Reserve Management Plan

• Yakombo Forest Reserve Management Plan
11. Selected correspondence

- Results Framework inconsistencies, June 2014
- Meeting notes, September 5, 2015
- Correspondence from Project Coordinator corrected version of the NREG TA work plan and the agreed Results Framework indicators, October 2014
Annex 7: Map of Ghana