



MINISTRY OF SANITATION AND WATER RESOURCES

GREATER ACCRA RESILIENT AND INTEGRATED DEVELOPMENT
PROJECT

Abbreviated Resettlement Action Plan
[Abridged Edition]

*Rehabilitation, Closure and Aftercare Management
of the Abloragyei Dumpsite*

Ga East Municipality
Greater Accra Metropolitan Area

February 2019

Basic Data on the ARAP

No	Description	Comment
1	Region	Greater Accra Region
2	Municipality/Town	Ga East Municipal Assembly/Abloragyei
3	Type of Civil Works Capping of Dumpsite and Post-cap Recreational Development	Site offices Construction/work camp; Site drains for runoff/storm water Access lane around dumpsite Leachate collector channels Sumps (2) Gas collection pipe vents Use of heavy duty equipment for – Pushing, filling/levelling and waste dump compaction Spreading and capping material (laterite) compaction Spreading of covering material (loamy soil) for grassing.
4	Total Size of Land affected	24 Acres
5	Ownership of Dump Land	Government Acquisition/Ablor Family Land
6	Number of affected Structures • Buildings (complete Structures) • Other Structures • Foundation Footings • Fence Walls Temporary affected Properties Waste Dump Land Affected Land	16 3 3 6 4 3 54 plots 16 plots
7	Total number of PAPs Number of Males Number of Females	18 16 2
8	Compensation for affected Structures, Land and Disruption of Business Activities	GHS 546,143.70
9	Compensation for Affected Land	GHS 381,562.50
10	Compensation for Waste Dump Land	GHS 297,000.00
11	Total Compensation due PAPs	GHS 1,224,706.20
12	Total Budget for implementation of ARAP	GHS 1,375,191.31
13	Contingency (5% of budget)	GHS 65,485.31

This Abridged Edition is for the purpose of confidentiality of the compensation entitlement of the PAPs

List of Acronyms

ARA	Abloragyei Residents' Association
ARAP	Abbreviated Resettlement Action Plan
EPA	Environmental Protection Agency
ESIA	Environmental and Social Impact Assessment
GARID	Greater Accra Resilient and Integrated Development
GEM	Ga East Municipality
GEMA	Ga East Municipal Assembly
GHS	Ghana Cedis
GoG	Government of Ghana
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
LC	Lands Commission
LVD	Land Valuation Division
M&E	Monitoring and Evaluation
MSWR	Ministry of Sanitation and Water Resources
OP	Operational Policy
P&T	Post and Telecommunications
PAPs	Project Affected Persons
PHC	Population and Housing Census
PIU	Project Implementation Unit
RAP	Resettlement Action Plan
RIC	Resettlement Implementation Committee
USD	United States Dollar

Executive Summary

Introduction

The decommissioning and capping of the Abloragyei Dumpsite is a component of the World Bank supported Greater Accra Resilient and Integrated Development (GARID) project, under the Ministry of Sanitation and Water Resources (MSWR). The GARID project is aimed at improving flood and solid waste management, and provision of public services to targeted communities within the Odaw Basin in the Greater Accra Region.

The rehabilitation and capping project will involve: i) pushing, filling and levelling, and compacting of the waste dumps; ii) spreading, levelling and compacting the capping material (laterite); and iii) spreading of covering material (loamy soil) for grassing. Other infrastructures and installations to be built include:

- Site offices and construction/work camp;
- Site drainage for runoff and storm water;
- Access lane around the dumpsite;
- Leachate collector channels and 2 sumps; and
- Gas collection pipe vents.

The post-cap and aftercare management activities will involve managing:

- Evacuation and transfer of leachate to the Kpone Landfill;
- Gas collection installed vents and gas production;
- Runoff from the capped dump, site drainage and potential erosion; and
- Post-cap end use of the area for recreational purposes.

The design and construction activities will extend notable environmental and social risks and impacts. As such, and in line with World Bank policies and Ghana's Environmental Assessment Regulations, 1999 (LI 1652), an Environmental and Social Impact Assessment (ESIA) was conducted at the site in October 2018 to assess and determine mitigation measures for risks and impacts of the proposed project. In terms of social impacts, the ESIA identified that a few project-affected persons (PAPs) may lose properties, land and/or livelihoods.

Based on field assessments and the findings of the ESIA, the Ministry of Sanitation and Water Resources commissioned work on this Abbreviated Resettlement Action Plan (ARAP) to identify and recommend measures for addressing involuntary resettlement related with the project. The ARAP prepared for the involuntary land-take that leads to the loss of property or means of livelihood of these PAPs, in line with the World Bank OP/BP 4.12. It is also consistent with the Government of Ghana (GoG) land acquisition requirements to ensure that PAPs are compensated for their losses at full replacement cost and provided assistance for disturbance, prior to the commencement of project civil works.

Policy, Legal and Institutional Framework

The ARAP process was guided by key policy and institutional frameworks that are applicable to the nature of works as described above. The policy framework includes the World Bank's Involuntary Resettlement Policy (OP/BP 4.12), which emphasises the need to ensure that the livelihoods of PAPs are, at least restored or their wellbeing and standard of living, in order not to impoverish any PAP. The applicable national law/regulations included:

- Environmental Assessment Regulations, 1999 (LI 1652);
- The Constitution of the Republic of Ghana;
- National Land Policy, 1999;
- States Lands Act, 1962 (Act 125); and
- The Lands (Statutory Wayleaves) Act, 1963.

Socio-Economic Characteristics of PAPs

A total of 18 PAPs were identified: 2 females and 16 males. Majority of the PAPs, about 44.4% were between the ages of 26 to 40 years, while 11.11% were between the ages 18 to 25 years. Nine (9) PAPs engaged in sale of various items, 5 were professionals, 3 artisans and one student. Ten (10) of the PAPs were Muslims, while the other eight (8) were Christians. Eight (44%) of the PAPs had attained senior high secondary education, while four (22%) had attained tertiary education.

Potential Socio-Economic Impacts

Based on PAP census and asset inventory, the project implementation will affect 22 properties, comprising 16 structures (permanent structures – 3 complete buildings, 6 foundation footings, 4 fence walls, 1 kraal, 1 wooden shack and 1 provision store); 3 structures (temporal) and 3 undeveloped lands. Some of the 18 PAPs will lose their properties, while businesses of others will be disrupted which could affect their means of livelihood. Put together the total area of land that will be impacted is 24 acres (20.52 acres of waste dump; and 3.48-acre adjoining lands and properties), belonging to 16 individual PAPs.

Mitigation Measures

The main mitigation measure is compensation for the 22 affected properties. The assessed values for monetary compensation for PAPs (for land and properties) amount to One Million, Two Hundred and Twenty-Four Thousand, Seven Hundred and Six Ghana Cedis and Twenty Pesewas (GHS 1,224,706.20).

All the structures were referenced and valued for compensation. Field visits and engagement with PAPs were conducted as appropriate to confirm the values of the affected properties. The valuation figures were disclosed to property owners and negotiated.

Eligibility

Any person likely to suffer loss of or damage to its structure, business, trade or loss of access to productive resources, as a result of the implementation of the capping project was considered eligible for compensation, provided the damage/loss was induced by the project.

The cut-off date agreed for eligibility for compensation was 5th January, 2019. The date was agreed on by the parties involved, i.e. PAPs, the Abloragyei Residents' Association, the Zongo Chief, and the Ablor Family in a meeting held on 4th January, 2019, where it was accepted by all that any structure put up after that date was not eligible for compensation.

Methodology and Valuation Procedure

The methodology used included questionnaire and data capture forms, document review and consultation with stakeholders and institutions. Field visits to the dumpsite and surrounding area, GEMA and to other stakeholders were carried out between 27th November 2018 and 2nd February 2019 to assess conditions of the affected properties and owners. The visits also evaluated the resettlement processes and options, among others.

In appraising the properties affected, the Replacement Cost Method was used in arriving at the open market capital value of the structures. Additionally, owners of the affected properties were actively involved in consultation and the negotiation processes. The PAPs understood their rights and the option to refuse the compensation rate proposed, and to engage an independent valuer or resort to the Law Courts.

Consultations and Validation Meeting

Consultations, focused group discussions and other engagement sessions were held with key stakeholders. These included the Land Valuation Division (LVD) of the Lands Commission (LC), GEMA, the Environmental Protection Agency (Appendix 12), the Zongo Chief, Chief of Abloragyei and the Ablor Family, as well as the PAPs. The series of engagements culminated in a validation and negotiation meeting held on February 2, 2019 at the Zongo Chief's house at Abloragyei. It was attended by over twenty people, including the PAPs.

ARAP Implementation Arrangement

A Resettlement Implementation Committee (RIC) was constituted to play a lead role in the ARAP implementation, at the validation meeting. The composition of the RIC included:

- GEMA (2 representatives) -
 - Physical Planning Officer; and
 - Works Engineer;
- Representative of the Ablor family;
- Representative of the Abloragyei Residents' Association (2 – a male and a female); and
- Representative of the PAPs (2 – a male and a female).

Grievance Redress Mechanism

A three-tier option for seeking grievance redress or conflict resolution was discussed and generally accepted as feasible means to manage grievances and other conflicts. These included:

1. A three-member Project Focal Group;
2. Grievance Redress Committee (GRC); and
3. The Law Court.

The first two tiers which are within the project's purview will have avenues and systems for recording, investigating, resolving, and documenting project-related complaints from PAPs.

ARAP Implementation Budget

The budget for the ARAP implementation is estimated at GH¢1,375,191.31 (USD 275,038.26 equivalent) as outlined in the table below.

Implementation Budget Estimate

Description	Amount (GH¢)
Public information/media advertisement	10,000.00
Implementation phase consultation with PAPs on compensation payment	30,000.00
Compensation for affected properties	546,143.70
Compensation for loss of land	381,562.50
Compensation for land acquired for refuse dumping	297,000.00
Grievance redress and dispute resolution (Transportation and allowances)	20,000.00
Monitoring and Evaluation (Independent Consultant)	25,000.00
Contingency	65,485.31
Total	1,375,191.31

PAPs will be paid their compensation (cheque) by GoG through MSWR for the loss of property/structures, disturbance, etc. The measures in place in the ARAP to ensure effective compensation processes and provision of facilities for PAPs include:

- ARAP implementation schedule (compensation plan/timelines);
- Resettlement Implementation Committee;
- Grievance Redress Committee to operationalize mechanism for seeking redress; and
- Assignment of institutional roles, evaluation and monitoring responsibilities and mechanisms to follow up on the post-compensation socio-economic circumstances of the PAPs.

Disclosure

This ARAP will be disclosed in Ghana by MSWR on its website and that of the Environmental Protection Agency. Copies will be made available at GEMA offices and also given to the Abloragyei Residents' Association. The document will also be disclosed electronically on the Documents and Reports database of the World Bank Website.

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1.0 INTRODUCTION

1.1 Background

The Government of Ghana (GoG) has applied to the World Bank for assistance in financing the Greater Accra Resilient and Integrated Development (GARID) project, aimed at improving flood and solid waste management, and provision of public services to targeted communities within the Odaw Basin of Greater Accra Region. Among the key interventions, the GARID project is supporting the Ministry of Sanitation and Water Resources (MSWR) to cover the Abloragyei Dumpsite, to prevent further leachate and waste pollution of the Dakobi Stream that discharges into the Odaw channel.

The Abloragyei Dumpsite and surrounding area, measuring about 50 acres of land in the Ga East Municipality (GEM), was originally acquired by GoG for the operations of the then Ghana Post and Telecommunications (P&T) Corporation, from the Ablor family in 1967. The land was however, not utilized at all by P&T. The area was later turned into an illegal sand winning area, consisting of numerous sand pits.

In the early 1990s, the Ablor family stepped in to stop the misuse of the land. In 1993, they ceded a section of the land for use as waste disposal, with the intention of filling the numerous sand pits created. This developed into a refuse dump, with various waste management companies (including Amanee Waste, Honest Waste, Waste Landfill and Kwayie) paying fees to the Ablor Family for dumping and managing waste at the site. The family also as leased out surrounding land by the dump to individual private developers. The effective area of the dumpsite is now about 20.52 acres, which consists of two separate dumps; delimited by development of houses and other structures.

1.2 Project Description

The rehabilitation, closure and capping activities will require:

- Setting up of temporary construction areas/work camp;
- Constructing site facilities, including –
 - Site office fitted with washrooms, store rooms, etc.
 - Fencing of the dump to prevent unauthorized access;
- Sourcing and storage of capping materials;
- Use of heavy duty equipment for –
 - Pushing, filling and levelling, and heavy machinery for compacting of the waste dumps;
 - Spreading, levelling and compacting the capping material (laterite); and
- Spreading of covering material (loamy soil) for grassing.

Other associated infrastructure and activities will include:

- Constructing site drainage for runoff and storm water;
- Constructing access lane around the dumpsite;
- Constructing leachate collector channels and 2 sumps; and
- Installing gas collection pipe vents.

The post-cap and aftercare management activities will involve managing:

- Evacuation, and transfer of leachate to the Kpone Landfill;
- Gas collection installed vents and gas production;
- Runoff from the capped dump, site drainage and potential erosion;
- Post-cap end use of the area for recreational purposes; and
- Other users and activities in the area surrounding the capped dump

An Environmental and Social Impact Assessment (ESIA) has been conducted to assess the environmental and social risks and impacts of the proposed decommissioning, capping and aftercare management of the dumpsite. The ESIA identified a number of project affected persons (PAPs) whose property and/or livelihoods would be affected. The PAPs were grouped into the following categories – those with:

- Property affected -
 - Full structures;
 - Foundation footings;
 - Wooden shed;
 - Kraal holding 45 cattle;
- Affected dump land (belonging to Waste Contractors);
- Affected land (belonging to individuals); and
- Businesses and a house temporarily affected.

1.3 Objectives of the RAP

The proposed project triggers the World Bank's Involuntary Resettlement Policy OP4.12 given the potential socio-economic risks and property impacts of PAPs. In order to address the risks and impacts that will result from the project, this Abbreviated Resettlement Action plan (ARAP) has been prepared for the involuntary land-take that leads to the loss of property or means of livelihood of PAPs. An ARAP considered appropriate, because the number of PAPs is less than 200, in accordance with the World Bank OP/BP 4.12. The ARAP aims to:

- Identify, assess and value the full range of adverse social impacts (involuntary resettlement) that may result from the execution of the proposed works;
- To ensure fair and adequate payment of compensation to persons who will lose land and properties due to the proposed works;
- Where applicable, invest or assist the affected persons to restore and/or improve their income-earning capacity.

The ARAP identified and quantified all likely losses of property and provides adequate mitigation measures in conformity with the World Bank's OP 4.12, and the Government of Ghana (GoG) requirements. It makes provision to ensure that PAPs are compensated for their losses at full replacement cost and provided assistance for disturbance, prior to the beginning of civil works. Additionally, a Grievance Redress Mechanism for ease of resolution of potential conflicts or grievances have been provided, among others.

1.4 Methodology

The preparation of the ARAP involved review of relevant documents including the following:

- World Bank's OP 4.12 Involuntary Resettlement (April 2013);
- The Constitution of the Republic of Ghana;
- States Lands Act, 1962 (Act 125);
- The Lands (Statutory Wayleaves) Act, 1963;
- Environmental Assessment Regulations, 1999 (LI 1652);
- National Land Policy, 1999;
- ESIA for the Rehabilitation, Closure and Aftercare Management of the Abloragyei Dumpsite (October 2018);
- Medium-term Development Plan of GEMA; and
- 2010 Population and Housing Census (PHC).

Consultations and other engagement sessions were held with key stakeholders, including PAPs, the Abloragyei Residents' Association, the Ablor family and Ga East Municipal Assembly (GEMA) (Appendices 4 to 8). The introductory letter for the engagements and the template used for data collection are given in Appendices 1 and 2.

Various communication tools were used to disseminate information, including:

- Meetings;
- Focus group discussions;
- Presentations;
- Posters;
- E-mails;
- WhatsApp;
- Report (Inception Report);
- Project report publications; and
- Phone communication

2.0 POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK

2.1 Introduction

The international and national policies and legal requirements relevant and applied in this ARAP are presented under the following:

- Legal and policy framework;
- Institutional framework; and
- Applicable World Bank policies.

2.2 Legal and Policy Framework

The legal and policy instruments reviewed included the following:

- Environmental Assessment Regulations, 1999 (LI 1652);
- The Constitution of the Republic of Ghana;
- The National Land Policy, 1999;
- States Lands Act 1962, Act 125; and
- The Lands (Statutory Wayleaves) Act, 1963.

2.2.1 *Environmental Assessment Regulations, 1999 (LI 1652)*

The Act prohibits undertaking any development that will have adverse impacts on PAPs without their involvement. Section 17(1) of the Act mandates the EPA to hold public hearings on any development considered to have extensive impact on the environment that will involve dislocation, relocation and resettlement of communities.

The ARAP processes involved all affected persons to ensure there is agreement on issues and understanding of the processes, as well as make informed decisions for sustainable project implementation, through stakeholder consultations and a validation/negotiation meeting (27th November 2018 to 2nd February, 2019).

2.2.2 *The Constitution of the Republic of Ghana*

Article 20 (1, 2, & 5) of the 1992 Constitution of the Republic of Ghana provides the manner of acquisition of property by the state. It provides protection from deprivation of property unless such acquisition is made in the interest of defence, public safety, public order, public morality, town and country planning, or the development or utilization of property to promote the public benefit. Where the acquisition of property is compulsory, provision for prompt payment of fair and adequate compensation will be made. The affected properties have been valued for compensation payment to PAPs.

2.2.3 *The National Land Policy, 1999*

The policy sets out a broad framework and policy guidelines for land administration and utilization. The policy's objectives among others are to:

- Protect the rights of landowners from becoming landless or tenants on their own lands; and
- Ensure timely payment of fair and adequate compensation for land acquired by government from stool, skin or traditional council, clan, family and individuals.

A Grievance Redress Committee and Resettlement Implementation Committee have been set up to ensure timely, fair and equitable compensation to PAPs.

2.2.4 *States Lands Act, 1962, Act 125*

This Act provides for the acquisition of land in the national interest. Whenever it appears to the President that land is in the national interest, he may declare it state land. Section 4 of the Act mandates a person claiming a right to land, or whose land has been affected in any manner, to submit in writing to the Minister within three months, details of land ownership, any damages suffered and amount of compensation claimed. Grievance Redress Committee and Resettlement Implementation Committee have been provided in the ARAP implementation arrangement to address all complaints, conflicts and grievances relating to all aspects of the compensation.

2.2.5 *The Lands (Statutory Wayleaves) Act, 1963*

The Act provides for “entry on any land for the purpose of the construction, installation and maintenance of works of public utility, and for the creation of rights of way and other similar rights”. Sections 3 and 4 of the Act mandates at least a 24-hour notice before entry containing purpose of survey and proposed works on land. Land owners shall be given at least one week notice in writing of entry, indicating works to be carried out. Section 6 of this Act states that where any person suffers any loss or damage of land as a result of construction, is entitled to compensation of an amount assessed by the Minister in respect of such loss or damage.

PAPs have been involved in developing this ARAP as well as the implementation arrangement, with provision for notification at every stage, e.g. advance notice required before demolition begins.

2.3 Institutional Framework

The institutions that have roles in the implementation of the ARAP include:

- Land Valuation Division;
- Attorney General’s Department and Ministry of Justice; and
- Town and Country Planning Department (GEMA).

2.3.1 *Land Valuation Division*

The Land Valuation Division (LVD) is the statutory institution under the Lands Commission responsible for assessing and approving compensation amount to PAPs. LVD has been provided documentation on the ARAP process, including asset inventory and valuation of affected properties.. This is to ensure that payments are made to people who are adversely affected and also that compensations offered affected persons are in accordance to law.

2.3.2 *Attorney General’s Department and Ministry of Justice*

Grievance Redress Committee has been set up to address complaints of PAPs. However, individuals who will not be satisfied with compensation offered them are empowered by the constitution to seek redress in a court of law.

2.3.3 Town and Country Planning Department

The Department prepares planning layouts for towns and cities and defines safety zones/right of way. It also vets and approves layouts prepared by prospective developers and specifies all reservations based on forecast land-use plans. The department is required to approve developments and grant permits in conformity with the already prepared layout of the area. According to GEMA, the area has not been zoned.

2.4 Applicable World Bank Policy

2.4.1 Involuntary Resettlement (OP/BP 4.12)

The policy on Involuntary Resettlement requires as follows:

- Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs;
- Where it is not feasible to avoid resettlement, resettlement activities should be conceived and executed as sustainable development programs, providing sufficient investment resources to enable the persons displaced by the project to share in project benefits. Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement programs; and
- Displaced persons should be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

The policies on Involuntary Resettlement provide measures to assist displaced people as a result of new development. These measures are necessary in order not to impoverish any affected person as a result of the project. It emphasises on action plan to restore the standard of living for affected persons in cases where resettlement is inevitable or loss of assets and impacts on livelihood occurs. Public consultation of “re-settlers” as well as the host communities is significant for the successful resettlement process and implementation of the action plan, in order to incorporate appropriate choices.

2.5 Comparing Ghanaian Law and the World Bank OP 4.12

The World Bank Operational Policy OP 4.12 makes adequate provision for PAPs who are either displaced or suffer loss as a result of the taking of land for projects, to be adequately catered for i.e. livelihoods of persons to be affected must be preserved, but in cases where loss of livelihood is inevitable, minimal displacements should occur. In instances where displacement is unavoidable, compensation should be paid to PAPs to help them restore their social and economic livelihoods to same status prior to project implementation.

The Ghanaian statutes make provision for compensation to be paid to only persons who have suffered loss and can produce any title to land in the form of deeds, leaseholds, or legally binding tenancy agreement to the land in question. But the World Bank’s Operational Policy 4.12 requires all forms of losses; land based and non-land-based assets to be compensated Moreover, under the Ghanaian Statute, only the Minister has the mandate to assess loss due to project impact, but the World Bank OP 4.12 advocates the involvement of PAPs through a consultative process in the planning, design and implementation of projects.

The Operational Policy advises that PAPs are assisted during their transition period in the resettlement site, and efforts made to restore their livelihood, whereas the State Lands Act is very silent on that. Table 2.1 provides a comparison between the Ghanaian Laws and the World Bank's Operational Policy. This ARAP has been prepared in line with the OP 4.12.

Table 2.1 Comparison of Ghanaian Laws and World Bank Policies

Item	Ghanaian Law Requirement	World Bank Law Requirement	Best Practice to be Adopted
Timing of Compensation	Prompt	Prior to displacement	PAPs are paid before they are relocated and before construction is allowed to commence
Calculation of Compensation	Fair and adequate	Full replacement cost	Open Market Value (for land) and full replacement cost for structures (buildings)
Squatters	No provision made; deemed not to be eligible.	Compensation for assets on land and provided supplementary assistance (but no compensation for land).	Squatters are paid compensation for non-land assets and given supplementary assistance to facilitate relocation.
Resettlement	In situations where inhabitants are displaced, the state is to resettle all on "suitable land with regards to economic wellbeing and social and cultural values"	Physically displaced persons provided with housing/housing sites, or as required, agricultural site at least equivalent to old site. Preference given to land-based Resettlement for displaced persons whose livelihoods are land-based.	PAPs are paid compensation for non-land assets and given supplementary assistance to facilitate relocation.
Resettlement Assistance	No specific provision with respect to additional assistance and monitoring.	Affected persons are to be offered support after displacement, for a transition period.	Additional assistance for loss of business profit and resettlement assistance will be paid followed by monitoring for a time period.
Information and Consultation	The owner /tenants on the land must be formally notified at least a week in advance of the intent to enter, and be given at least 24 hours' notice before actual entry.	Displaced persons and their communities are provided timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementation and monitoring resettlement.	Public hearing and fora are conducted for information sharing and community participation. The PAPs will be consulted and enabled to participate throughout the project life.
Grievances	Informal mechanisms and formal access to court of law.	Appropriate and accessible grievance mechanisms to be established.	Grievance committees are formed. A claimant can resort to court action.

However, in the event of differences between the national legal framework and the World Bank Policy, the one that provides the highest and better protection of PAPs would be adopted and implemented. Usually the provisions of the World Bank are applicable, because they meet standards of international best practice.

3.0 SOCIO-ECONOMIC CHARACTERISTICS OF PAPs

This chapter presents a summary of the findings of the socio-economic study of PAPs (Table 3.1). The study was conducted from 10th December, 2018 to 26th January, 2019.

Table 3.1 *Socio-Economic Characteristics of PAPs*

A	Population	Number	%			Social	Number	%
A1	Gender				B2	Education		
	Male	16	88.8			Primary	1	6%
	Female	2	11.2			JHS/Middle School	4	22%
A2	Marital Status					SHS	8	44%
	Married	16	88.89			None	1	6%
	Single	2	11.11			Tertiary	4	22%
A3	Age Group				B4	Ethnic Distribution		
	18-25	2	11.11			Akan	3	16.66
	26-40	8	44.44			Ewe	3	16.66
	41-50	4	22.22			Dagomba	2	11.11
	Above 50	4	22.22			Kotokoli	2	11.11
C	Economic	Number	%			Hausa	1	5.56
C1	Occupation					Zamramra	1	5.56
	Farming	0	0			Gonja	2	11.11
	Sales	9	50.0			Mossi	2	11.11
	Professionals	5	27.8		C	Economic	Number	%
	Artisan	3	16.67		C2	Income Levels		
	Student	1	5.56			Less than 100	0	0
B	Social	Number	%			100-500	1	5.56
B1	Religion					500-1000	6	33.33
	Christian	8	44.44			Above 1000	11	61.11
	Muslim	10	55.56					

3.1 Distribution and Usage of Structures of PAPs

Structures of PAPs were randomly scattered at the proposed project area (Figure 3.1). Out of the 22 properties identified, 16 structures will be permanently affected - 3 complete structures (buildings), 6 were foundation footings, 4 fence walls, a wooden shack, a kraal, and a provision shop. Three undeveloped lands will be affected. Another three of the properties will be temporarily displaced during works - a drinking spot, a food vendor and a residential facility. Figure 3.1 shows the distribution of structures on the proposed project site.

3.2 Demographic Characteristics of PAPs

Of the total number of 18 PAPs identified; the age bracket of 26 – 40 constituted the dominant group, while the 18 – 25 age bracket were the least represented (Figure 3.2).

3.3 Marital Status

Most of the PAPs were married, with only 11.11% being singles (Figure 3.3).

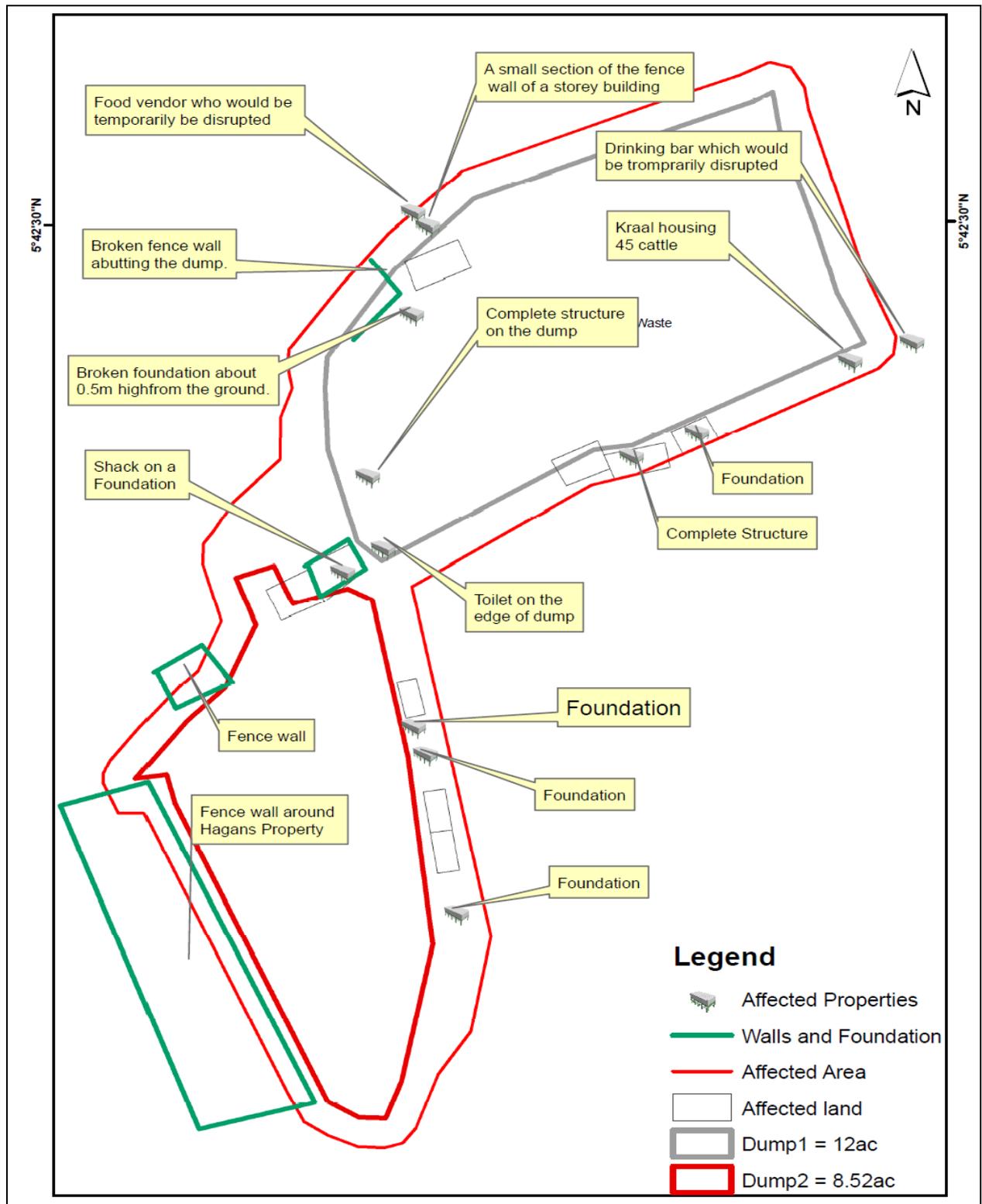


Figure 3.1 Distribution of Affected Structures

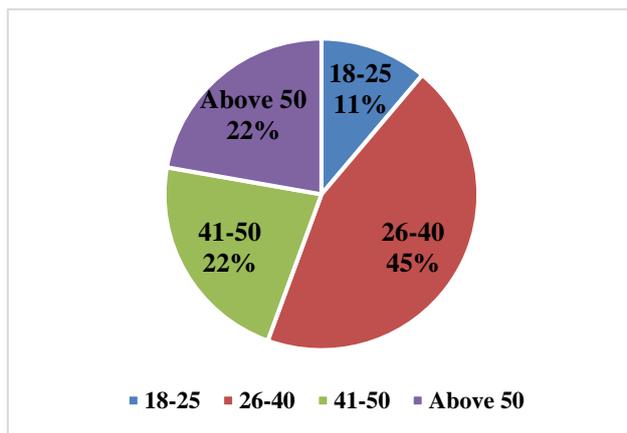


Figure 3.2 Age of PAPs

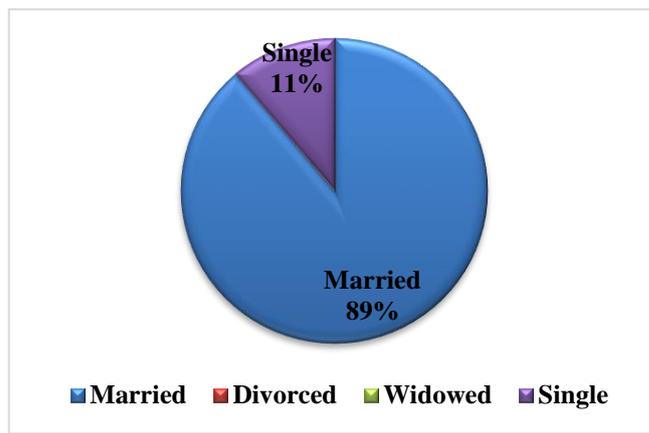


Figure 3.3 Marital Status of PAPS

3.4 Religion

A large proportion of the PAPs (56%) were Muslims, with the remaining 44% being Christians (Figure 3.4).

3.5 Educational Background

About 44% of the PAPs had attained Senior High Secondary education, while about 22% had tertiary education. Only 6% had no formal education (Figure 3.5).

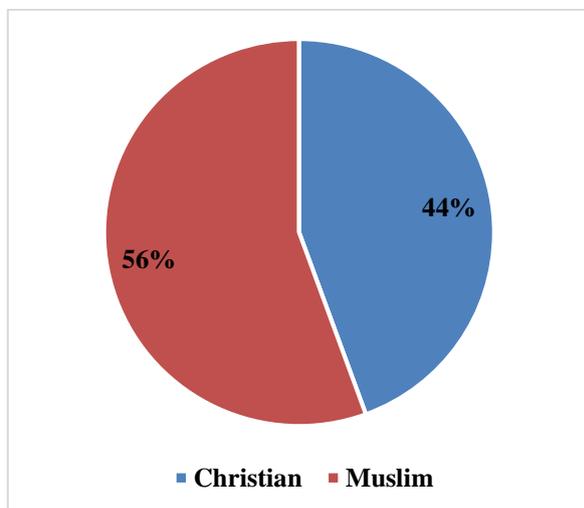


Figure 3.4 Religion of PAPs

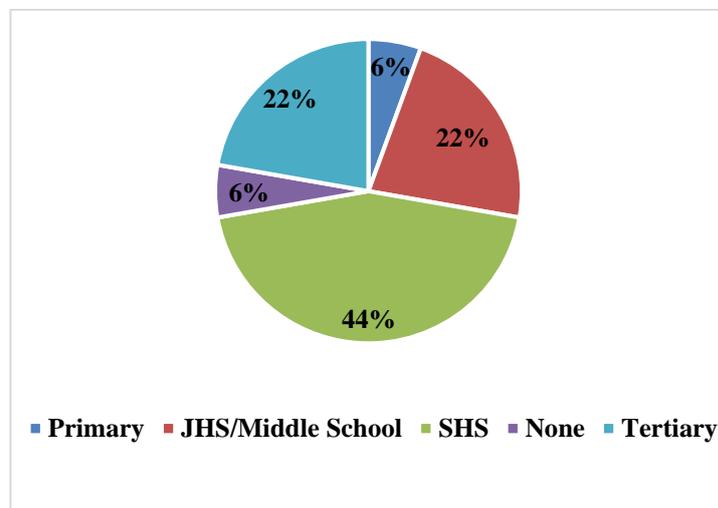


Figure 3.5 Educational Background of PAPS

3.6 Ethnicity

The PAPs belong to nine ethnic groups, with Ewes and Akans dominating. The other ethnic groups included Ga, Kotokoli, Dagomba, Hausa, Zamrama, Gonja and Mossi (Figure 3.6).

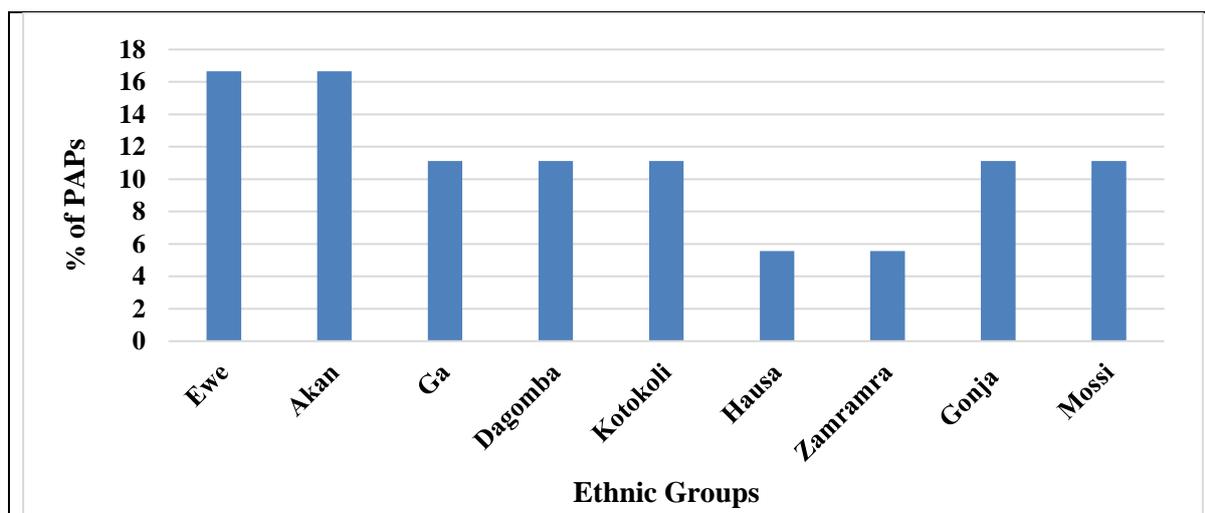


Figure 3.6 Ethnicity of PAPs

3.7 Occupation

The occupation of about 50% of the PAPs was sales, followed by professionals (28%), then artisans (17%). About 5% of the PAPs were students (Figure 3.7).

3.8 Income Levels

About 61% of the PAPs earned above GHS1,000 per month, 33% earned between GHS500 – GHS1,000 and 6% earned between GHS100 – GHS500 (Figure 3.8).

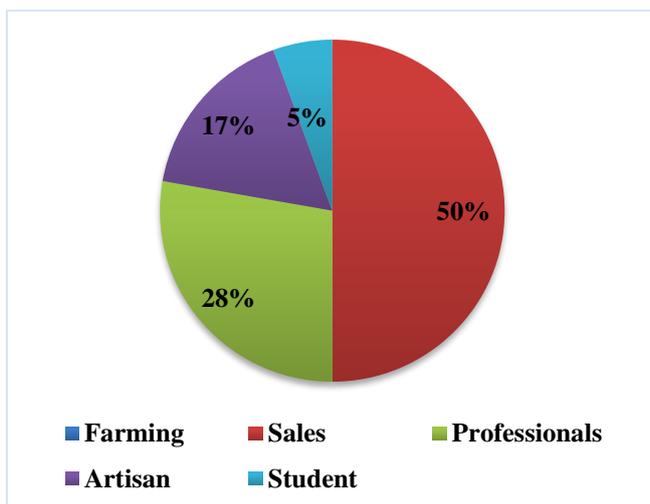


Figure 3.7 Occupation of PAPs

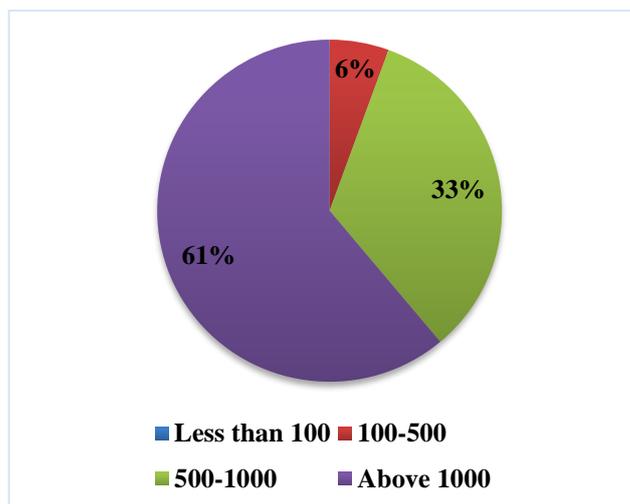


Figure 3.8 Monthly Earnings of PAPs

3.9 Dependency

More than 75% of the PAPs had 4 or more dependents, while the other 25% had 3 or less dependents.

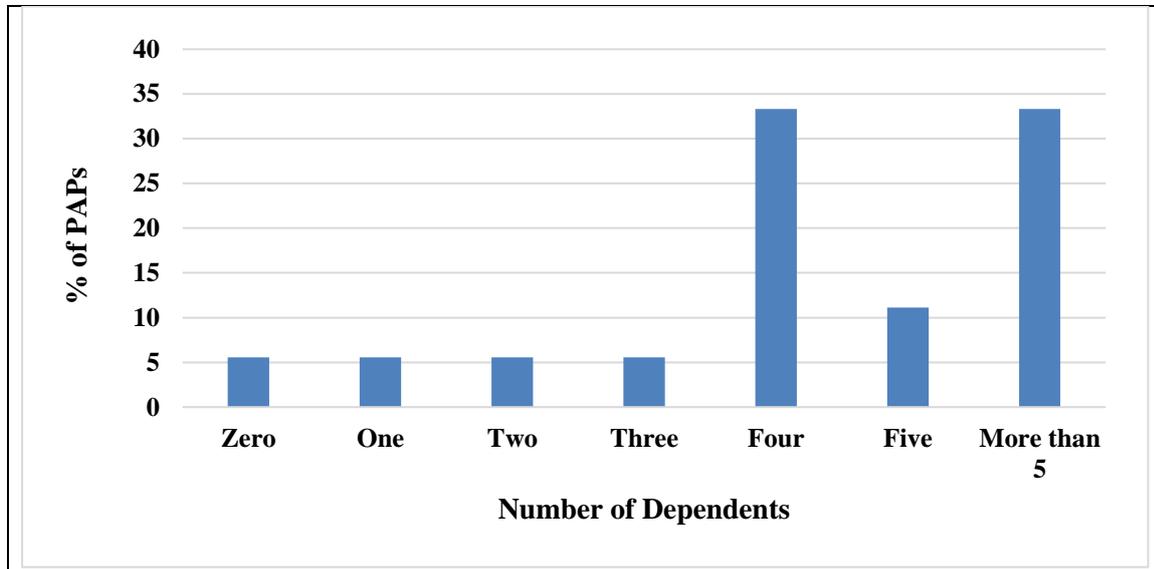


Figure 3.9 Number of Dependents of PAPs

4.0 VALUATION PROCEDURE

This section covers resettlement requirements for the Abloragyei Dumpsite capping project; the types of entitlements, eligibility, valuation of affected property, determination of compensation and the compensation procedure.

4.1 Entitlement Matrix

The entitlement matrix outlines the various types of losses resulting from project implementation and provisions for compensation for various categories of affected persons. The matrix applies to all project activities entailing involuntary resettlement impacts. If in any stage of the project, additional resettlement impacts are identified, the ARAP will be updated making provisions for mitigating such impacts with compensation and resettlement assistance in line with the entitlement matrix. This matrix has been prepared considering various categories of losses and impacts identified during the environmental and social assessment, which is summarized in Table 4.1.

The entitlement matrix is based on applicable Ghanaian laws, the State Lands Act, and is in compliance with the World Bank's safeguard policies. The entitlement matrix offers compensation for land and structure at replacement cost, resettlement assistance for temporary loss of incomes, and mitigation measures for temporary impacts.

Table 4.1 General Entitlement Matrix

Type of Loss/ Disturbance	Definition of affected Persons	Entitlement	Details
1.0 Land Acquired for refuse dump			
Loss of land due to project implementation	Legal title holders / affected parties with land use rights reorganized under the law	Compensation at market value	Compensation for affected land at replacement cost (54 plots belonging to 3 Waste management companies)
2.0 Private Land without structure			
Loss of land due to project related activities	Legal title holders/affected parties with land use rights reorganized under the law	Compensation at market value	<ul style="list-style-type: none"> • Compensation for affected land at market value. • Compensation for the remainder or residual land, if the land take is more than half the original size, at replacement cost
3.0 Residential Land and structures			
Permanent and full loss of private residential land and structure	Owner /occupants with title or other ownership documents recognised under the law	Compensation at replacement cost	<ul style="list-style-type: none"> • Compensation for the whole plot valued • Compensation for disturbance • Compensation for affected structure at replacement cost without deduction of any depreciation or salvageable materials • Right to salvage material from the demolished structure
Partial loss of Residential land and structure	Owner/Occupants of residence with	<ul style="list-style-type: none"> • Compensation at replacement cost 	<ul style="list-style-type: none"> • Compensation for affected structure at replacement cost

	title or other ownership document recognise under the law		
Temporary loss of residential structure	Owner/occupants of residence with title or other ownership document recognise under the law	Compensation for temporary relocation	<ul style="list-style-type: none"> Rental allowance for alternative accommodation for up to 3 months (whichever is higher) for Transportation allowance to relocate
loss of residential structure	Squatters	Compensation and resettlement assistance	<ul style="list-style-type: none"> Fixed kiosks/sheds will get structure compensation Right to salvage building materials
4.0 Businesses and Livelihoods			
Loss of commercial kiosks	Vendor operating business with or without permission	<ul style="list-style-type: none"> Resettlement and rehabilitation assistance 	<ul style="list-style-type: none"> Recoverable amount would be paid to vendor Mobile/movable vendors will get one month's prior notice to relocate nearby for continuing their business
Temporary disruption of business	Owner/operator of business	Compensation and Resettlement assistance	<ul style="list-style-type: none"> Recoverable amount will be paid for up to 3 months

4.1.1 Unit of Entitlement

The unit of entitlement can be an individual, household, family or a community. The Entitlement Matrix considers the unit of loss to determine the unit of entitlement. Even as household is the unit of entitlement in case of providing compensation for the loss of land and structure, the titleholder-who may be an individual, a household, or a group of individuals becomes the unit of entitlement. If more than one person has legal or customary rights to a property or resource recognized under law the compensation has to be shared.

4.2 Eligibility Criteria

Any person or household who will suffer loss of or damage to a land, shelter, business, trade or loss of access to productive resources, as a result of the implementation of the capping project was considered eligible for compensation and/or resettlement assistance, provided the damage/loss is induced by the project. To be eligible one must have been captured in PAP census and asset inventory by the close of the cut-off date – January 5, 2019. The eligibility list provided in the ARAP (Appendices 10 and 11) remains the basis for providing entitlements to the non-titleholder PAPs. In case of titleholders, eligibility is determined through scrutiny of title deeds or other ownership documents recognized under law. The World Bank's Operational Policy 4.12 provides three criteria for eligibility. These are:

- Those who have formal legal rights to asset (including customary and traditional rights recognized under the laws of the country);
- Those who do not have formal legal rights to assets at the time of census but have a claim to such assets and become recognized during the survey; and
- Those who have no recognizable legal rights or claim to the assets they are occupying.

By inference, a person is eligible for compensation as long as they had/owned a permanent structure, or a temporary structure that had been in the particular location before properties were marked for demolition.

The eligibility is determined on the basis of impact survey carried out while preparing the ARAP. The categories recognized as eligible for receiving entitlements are listed below:

- **Business Operators:** A person who owns or conducts a business within the project-affected area, the operation of which will be disrupted by the project activities. He/she can be a legal owner, non-titled structure owners, or tenant and will receive different compensation and resettlement assistance as per the Entitlement Matrix;
- **Property Owners:** Includes any person, households regardless of their ownership status (including encroachers/squatters) that will face their living adversely affected; and/or lose their title, or beneficial right to land, house, habitat, water resources or any other asset possessed, due to the project implementation;
- **Squatters:** People who have occupied land and have erected structures on it for the purpose of residence / income activities without legal title/rights and are not entitled to compensation for lost land under this policy. But, if displaced, they are entitled to resettlement assistance as per the Entitlement Matrix.

4.2.1 Cut-off Date

The cut-off date for eligibility for compensation and/or resettlement assistance was 5th January, 2019. The date was agreed by the parties involved, i.e. the Zongo Chief, the Abloragyei Chief, the Abloragyei Residents Association and the PAPs, where in a meeting, it was agreed and accepted that any structure that came up after the date would not be eligible for compensation (Appendix 3).

4.3 Notification and Valuation Process

After determining the space required for the capping of the dumps, the structures found to be affected by the project were given unique identification numbers (see Figure 3.1). The owners of affected properties were duly notified as part of the assessment process; and were requested to furnish the valuation team with relevant information with regard to their interest in the affected properties. The valuation team then proceeded to assess the properties.

4.3.1 Basis of Valuation

The appraisal exercise was based on the Market Capital Value which is defined as the best price at which the sale of an interest in a property might reasonably be expected to have been completed unconditionally for cash consideration on the date of the valuation. The open market value of the properties was arrived at based on the purpose of valuation, the availability and reliability of basic data for the valuation.

4.3.2 Method of Valuation

In appraising the properties, the Replacement Cost Method was used in arriving at the market capital value of the improvements. The RCA is based on the assumption that cost and value are related. It involves finding the estimate of the gross replacement cost of a structure/development which is the estimated cost of constructing a substitute. A gross replacement cost of a structure is the cost of putting up a similar structure in its current state at the similar or comparable location. The LVD rates of 2018 are applied to the internal measurement to get the gross replacement cost. The LVD rates for the structures serve as a baseline as such, could be adjusted upwards or downwards depending on the physical characteristics and state of the structure. The estimated values represent the cost of the property as if constructed new.

Referencing of buildings or structures was done by taking physical measurements and noting down the constructional details and finishes of the structure such as the floor type, roof type, window & door type, ceiling, fittings & fixtures, etc. For the purpose of validation and cross-referencing with the household socioeconomic survey, pictures of the respective head of affected households were taken and recorded. In all the process, PAPs were duly consulted and kept informed about key project details and land requirements.

Compensation for Affected Structures to be Demolished

In general, the compensation due the affected person comprises:

- The full replacement cost or repair cost of the affected property;
- Disturbance to the owner/user of the property (estimated at 10% of the full replacement cost of affected asset); and
- An amount representing loss of income or livelihood (supplementary assistance) for the period of the disruption of the commercial usage of the property or asset (estimated at 15% of the asset value). Residential units do not attract loss of livelihood rates as was the case in this exercise.

Compensation for Loss/Closure of Business and Alternative Accommodation

These are temporal loss of income/livelihood and also non-habitability of dwellings that will be occasioned by the project and this time period has been estimated at three months.

Source of Rates for Structures

Building and construction cost rates adopted for this appraisal were based on information/data on present day construction cost of purpose built buildings/structures with similar constructional details as the subject properties encountered. Information was sourced from local and international construction experts such as estate developers, Quantity Surveyors and international reports on construction cost, Africa Property and Construction Cost Guide 2014, 2016 and 2017. The 2018 LVD rates were also considered and adjusted. The following factors were also considered:

- Demand and supply of the subject property;
- Location of the subject property and area trends;
- Finishes and fittings of the subject property;
- Services provided to the subject property;
- The quality of finishes to the property;
- The nature / design of the building;
- Market capacity/vacancy levels;
- Data of historical sales value escalations in area;
- Prevailing market conditions;
- Macro-economic environment;
- Specifics of property related to market needs;
- Condition, nature & desirability of property;
- The quality of workmanship;
- Zoning of property & potential for rezoning;
- The type and quality of materials of construction used;
- Recent data of sale transactions of similar properties in area;

- Size and accommodation of the subject property.
- Micro economic environment; and
- Potential for expansion or redevelopment of property, on existing land, or consolidation of adjacent land/property.

4.3.3 Modes of Restitution

The MSWR will submit the property values to the LVD (head office) for their independent referencing, review and approval. The approved compensation figures will then be forwarded to the Ministry of Finance for release of funds to MSWR Capital Account for cash payments to the PAPs. This process will take place after the publication and disclosure of the ARAP. Compensation payment will be made before the commencement of demolition, civil works and capping.

The State Lands Act gives PAPs adequate legal coverage, which guarantees them compensation, which must be based on mutual agreement. If the property owner is not satisfied with the Government offer he/she has the option of employing a private valuer of his/her choice to reassess the property and submit the values to the LVD for consideration and final determination of the value. The determined figure by the LVD is then communicated to the MSWR for payment to the beneficiaries.

In situations where a PAP is still not satisfied with the amount of compensation paid, he/she is at liberty to seek redress at the courts. However, the property cannot be demolished until the issue is resolved.

5.0 PUBLIC CONSULTATIONS

Consultations were held with key stakeholders and PAPs from November 27, 2018 to February 2, 2019 to understand their issues and concerns. A cut of date (5th January, 2019) was agreed on by the stakeholders on 4th January, 2018. Details of the outcome of the consultation are provided in Appendices 4 – 8.

5.1 Key Stakeholders Engaged

Key stakeholders engaged included the following:

- GEMA (5 persons, including 2 women);
- Traditional authority and opinion leaders (10 persons, no woman);
- Abloragyei Residents' Association (about 15, no woman); and
- Project affected persons (18 persons, including 2 women).

The consultation process was carried out in two parts:

- Consultations with individual PAPs as part of structured baseline data collection; and
- Joint meeting held with stakeholders including GEMA, resident association, traditional authorities and the PAPs.

5.2 Consultation with Individual PAPs

Consultations were held with GEMA and individual PAPs from November 27, 2018 to February 2, 2019 during which they were briefed about the project impacts on properties; compensation package and documented recognition of their plotted property, and registration of assets. A form was administered to facilitate property inventory and ownership aspects (e.g. mode of acquisition, use of property, year of acquisition, etc.). The result of the consultations showed that PAPs were generally positive about the project.

5.3 Joint Meeting

A joint engagement session of about 26 persons, involving GEMA, Abloragyei Resident Association, traditional authorities and PAPs was held on 24th December, 2018 at the Conference Hall of GEMA. The meeting was held to:

- Inform stakeholders about the project and its potential impacts;
- Provided opportunity to discuss concerns, the valuation and compensation procedures, etc.;
- Optimized the involvement of PAPs in all stages of the process; and
- Solicited views of the respective stakeholders for inclusion in the ARAP.

5.5 Validation and Negotiation

Validation meeting was held in the house of the Zongo Chief on Saturday, February 2, 2019 to disclose the amount due PAPs and to open up for negotiation. Thirteen PAPs were in attendance. The meeting was successful and the PAPs were satisfied with the amount to receive.

5.4 Future Consultations

Once payment of compensations to the individual PAPs is due, they will be notified of the compensations through another level of engagement, where details of the compensation payment and other resettlement arrangement will be provided.

6.0 POTENTIAL SOCIAL IMPACTS AND MITIGATIONS

The main social/property impact arising from the implementation of the project will be the loss of properties and the resultant socio-economic implications on productivity and livelihoods of the PAPs.

6.1 Loss of Properties

The project implementation will affect 22 properties (16 permanently affected structures, 3 temporarily affected structures and 3 undeveloped lands) belonging to 18 PAPs (Figure 3.1). This will require the removal of 3 complete structures, 6 foundation footings, 4 fence walls and 1 wooden shack on a foundation to pave way for the project (Table 6.1). Properties to be permanently displaced include a provision store and cattle kraal, while those to be temporarily displaced include a drinking bar, food vendor and residents of residential building.

A few of the PAPs will be deprived of their living and working areas, which would lead to disruption of their businesses, and security (for those losing part of their fence walls). Occupants of the residential building very close to the footprint of the dumps will be temporarily relocated as a result of dust and noise from project activities. Dependents of PAPs to be directly affected are 6 in total, 4 from the residential building to be temporarily displaced and 2 from a complete structure that is currently inhabited.

Table 6.1 *Impacts of Properties Affected*

No.	Property Affected	Impact	Entitlement/Mitigation Measure
1.	3 Complete Structures	Permanent loss of structures	PAPs will be compensated for total loss of structures
2.	6 Foundation Footings		
3.	4 Fence Walls	Loss of structures	PAPs will be compensated for loss of their fence walls
4.	1 Wooden Shack (on a foundation)	Permanent displacement of structures	PAPs will be compensated for displacement of their structures
5.	1 Kraal (housing 45 cattle)		
6.	1 Provision Store (wooden kiosk)		
7.	1 Drinking Bar	Temporary displacement of PAPs	PAPs will be compensated for temporary relocation during the project implementation period
8.	1 Food Vendor		
9.	1 Residential Building		
10.	3 Undeveloped Lands	Permanent loss of land	PAPs will be compensated for loss of land

6.2 Mitigation Measures for Property Loss

Provision has been made for the compensation of affected properties after valuation (GHS 546,143.70) in accordance with relevant provisions in the Constitution of Ghana and the World Bank OP 4.12 on Involuntary Resettlement. The compensation entitlements are derived from the description of structures and entitlements (Appendices 10 and 11), which will be implemented to ensure that each PAP is fairly and equitably treated. Compensation provision has also been made for loss of land on which structures are, as well as land that was leased by waste management companies for waste disposal purposes. The

decision to compensate the waste management companies was arrived at a joint meeting with MSWR, GEMA, World Bank officials and the consultant (Appendix 8).

All the structures were referenced and valued for compensation. Field visits were conducted as appropriate to confirm the values of the affected properties. The valuation figures were disclosed to property owners and negotiated. The other measures in place to ensure effective implementation of the ARAP include:

- ARAP implementation schedule (compensation plan/timelines) (Table 7.2);
- Resettlement Implementation Committee (Section 7);
- Grievance Redress Committee to operationalize mechanism for seeking redress; and
- Assignment of institutional roles and evaluation and monitoring mechanisms to follow up on PAPs welfare, post-compensation.

6.3 Compensation Valuation

Table 6.2 presents the reference codes of PAPs and type of property affected. The affected lands and sizes are presented in Tables 6.3 and 6.4. Some details of the entitlement to PAPs are presented in Appendices 10 and 11.

Table 6.2 *Affected Structures and Businesses*

Reference Code	Property Type
AB/001	Drinking bar
AB/002	Cattle kraal
AB/003	Foundation footing
AB/004	Complete structure
AB/006	Fence wall
AB/007	Fence wall
AB/008	Food vendor
AB/009	Foundation footing
AB/010	Fence wall
AB/011	Complete structure
AB/012	Complete structure
AB/013	Wooden shack
AB/014	Foundation footing
AB/016	Foundation footing
AB/018	Foundation footing
AB/019	Foundation footing
AB/020	Foundation footing
AB/021	Fence wall
AB/022	Residential building
Total	

Table 6.3 Affected Lands and their Sizes

Reference Code	Land Size (in acres)	No. of Plots
AB/003	0.12	1
AB/004	0.12	1
AB/005	0.12	1
AB/007	0.16	1
AB/009	0.16	1
AB/010	0.16	1
AB/011	0.16	1
AB/012	0.16	1
AB/014	0.16	1
AB/015	0.14	1
AB/016	0.14	1
AB/017	0.06	1
AB/018	0.14	1
AB/019	0.14	1
AB/020	0.14	1
AB/021	0.14	1
Sub-total		

Table 6.4 Affected Waste Dump Land

Waste Dump Land owned by Waste Management Companies		
Honest Waste	0.16	14
Amanee Waste	0.16	35
Kwayie Waste	0.16	5
Sub-total		

7.0 IMPLEMENTATION ARRANGEMENT

This section presents the key stakeholders who will be involved in the planning, implementation, monitoring and evaluation of this ARAP. It also highlights the ARAP Action Plan (with implementation schedule), giving the duration and timeframe of the key milestones and tasks, as well as the budget for implementation.

The Operational Policy (OP 4.12) stresses that “All resettlement plans should include an analysis of the institutional framework for the operation and the definition of organizational responsibilities”. The various stakeholders at the national and local levels required to play various roles have been analysed; Table 7.1 presents the stakeholder map of the ARAP process.

Table 7.1 Stakeholder Map

Stakeholder	Interest	Role
The World Bank	Secondary	<ul style="list-style-type: none"> • Maintain an oversight role to ensure compliance with the safeguards policies • Maintain an oversight role on the supervision of the ARAP implementation • Provide guidance to ensure overall compliance with safeguards
MSWR	Secondary	<ul style="list-style-type: none"> • Lead implementing ministry for GARID project by providing policy guidance and approval for all activities • Support GEMA in ensuring that contractors comply with safeguards requirements • Transfer funds and skills to GEMA
Land Valuation Division	Secondary	<ul style="list-style-type: none"> • Assess and approve compensation amount to PAPs. • Receive value and verify documentation on affected properties. • Ensure that payments are made to people only those adversely affected
EPA	Secondary	<ul style="list-style-type: none"> • Oversight of the ESIA and ARAP processes • Grant Environmental Permit for ESIA and ARAP and for project to commence
GEMA	Primary	<ul style="list-style-type: none"> • Coordinate activities at local level during ARAP preparation and implementation • Responsible for the appraisal of properties and livelihoods affected by the project. • Coordinate implementation of resettlement assistance and grievances
Contractor	Secondary	<ul style="list-style-type: none"> • Capping of the dumpsite and construction of associated infrastructure • Provide implementation schedule to the Implementation Committee • Coordinate implementation activities with GEMA, including • Ensuring compensation are paid before demolition of structures of PAPs
ARA	Primary	<ul style="list-style-type: none"> • Facilitated identification of PAPs • Supported the ARAP process and will be a reliable ally in the implementation phase • Will be part of the ARAP Implementation Committee • Will be part of the Grievance Redress Committee
PAPs	Primary	<ul style="list-style-type: none"> • Cooperated with the ARAP processes and in full favour of the project implementation • Will be part of the ARAP Implementation Committee • Will be part of the Grievance Redress Committee • Submit complaints where necessary

7.1 Resettlement Implementation Committee

A Resettlement Implementation Committee (RIC) has been formed to play a lead role in the ARAP implementation. It was formed in a participative manner with the respective groups nominating representatives. The RIC includes people perceived to have knowledge and experience to effectively liaise between the committee and the group they represent and also the capacity to ensure equity. To ensure a broad representation, the RIC is composed from the following:

- GEMA (2 representatives) -
 - Physical Planning Officer; and
 - Works Engineer;
- Representative of the Ablor family;
- Representative of the Abloragyei Residents' Association (2 – a male and a female); and
- Representative of the PAPs (2 – a male and a female).

7.2 Implementation Schedule

The schedule for the implementation of the ARAP is presented in Table 7.2. The schedule covers the period from preparation of the ARAP through the completion of the capping activities to the post-cap phase. The launch of the RIC and the Grievance Redress Committee formation will commence the implementation of the ARAP. Public notices will be posted at the Municipal Assembly and also close to the project site, as well as radio announcements made on the local FM Radio Station (Oman FM) to ensure a wide publicity. These announcements will inform the PAPs on the ARAP implementation schedule and related arrangements (e.g. compensation payment timing and mode, as well as meeting venue and time).

Payment of compensation to PAPs shall be completed before the commencement of civil works, in compliance with the Bank and EPA Resettlement Policies. The plan for the implementation of activities must be agreed between the RIC and the PAPs. These include the target dates for start and completion of all compensation payments, before civil works for the project can start.

Table 7.2 Preparation and Implementation Schedule

Major Activities	Months							
	1	2	3	4	5	6	7	8
1. Detailed survey of PAPs								
2. Assessment and valuation for compensation								
3. Validation workshop								
4. ARAP Disclosure								
5. Compensation review and approval by LVD								
6. Formation of implementation and redress committees								
7. Education and consultation on ARAP implementation (compensation payment arrangement)								
8. Payment of compensation								
9. Grievance redress mechanism								
10. Monitoring and evaluation								
11. ARAP completion report								

8.0 GRIEVANCE REDRESS MECHANISM

Implementation of the ARAP could generate complaints and grievances. A grievance redress mechanism (GRM) provides the means for any person or entity aggrieved or dissatisfied with any activities related to the ARAP implementation or project activities to lodge a complaint or register a grievance, e.g. in relation to the process of compensation. The essence of GRM is therefore to ensure project affected persons (PAPs) have the avenue for seeking redress to a concern, an unfair treatment or a case of inequity in a fast, organized and transparent manner.

This is consistent with the requirement of the World Bank's policy on Involuntary Resettlement (OP 4.12) that all project resettlements incorporate a Grievance Redress Mechanism – one that is accessible, free, easily understood, transparent, responsive and effective. This must not restrict access or resort to official legal channels (such as the courts, and other traditional or community disputes settlement mechanism), and cause no fear of negative consequences for recourse to any such redress option. The PAPs were not only informed of the formation and existence of a GRM for the stated purposes, but were involved in selected people to represent them, at the disclosure and negotiation meeting.

A Grievance and Resolution Form (Appendix 9) will be provided to record all grievances. Specifically, the grievance procedure will:

- Provide PAPs with avenues for making a complaint or resolve any dispute that may arise during the course of ARAP implementation, e.g. compensation payment for property affected;
- Ensure that appropriate and mutually acceptable corrective actions are identified and implemented to address complaints;
- Verify that complainants are satisfied with outcomes of corrective actions; and
- Avoid the need to resort to judicial processes.

The grievance redress process shall follow the chain below in resolving grievances, including introducing any other initiatives that could compliment the effectiveness of the process:

- Receive grievances;
- Grievance assessed and logged;
- Acknowledgement of grievances;
- Follow-up and processing;
- Develop response;
- Verification, investigation and action;
- Monitoring and evaluation; and
- Feedback.

A three-tier option for seeking redress or conflict resolution was generally accepted by the PAPs (Appendix 6) as feasible means to manage grievances and other conflicts. These processes are:

- A three-member Project Focal Group;
- Grievance Redress Committee (GRC); and
- The Law Court.

8.1 Three-Member Project Focal Group

The three-member focal group will be the first point of contact for the PAPs and other residence of Abloragyei who will have grievances (e.g. unfair compensations) during the project implementation. If a PAP refuses the compensation approved by LVD, litigation could be settled at this first level. Persons who are dissatisfied with the outcome of their concerns presented at this level could transfer their unresolved grievance to the second level, which is the GRC. The committee is also open to receive other complaints during works.

The membership of the Focal Group will include the executives of the Abloragyei Residents' Association - the president of the association will chair this committee. The composition of the Focal Group is presented in Table 8.1.

Table 8.1 *Composition of the Three-Member Focal Group*

Name	Designation	Contact
Chief Mubarak Mumuni	President - ARA	0246746185
Henry Mawutor	Coordinator	0244781261
Justina Mends	PAP	0546268610

8.2 Grievance Redress Committee

The second tier, the Grievances Redress Committee, is a semi-formal and semi-adjudicatory structure within the project that receives complaints and amicably resolves them. The GRC will be chaired by the Development Planning Officer of GEMA to amicably settle complaints and grievances. Other members of the committee will include the following:

- GARID Project Coordinator;
- Development Planning Officer of GEMA;
- Representative of Ablor family;
- Representative of ARA; and
- Representative of PAPs.

8.3 Courts of Law

By the laws of Ghana, when all the forms of alternative dispute resolution fail, the law courts represent the last resort for an aggrieved person. The litigation commences from as low as the Magistrate Courts and if the applicant is still not satisfied with the decision, it could end at the highest court of the Land (the Supreme Court).

9.0 MONITORING AND EVALUATION ARRANGEMENT

9.1 Introduction

The World Bank requires project sponsors to monitor and report on the effectiveness of ARAP implementation, including disbursement of compensation, effectiveness of public consultation and participation activities, and the sustainability of income restoration among PAPs. The primary objective is to provide feedback on the ARAP implementation and to identify problems and successes as early as possible in order to allow for timely adjustment of implementation arrangements. The PIU of the MSWR will hire an external consultant to carry independent monitoring and quality assurance. The Project will have a participative implementation monitoring system established at the bottom, which will enable the local resettlement committee to participate in the implementation process in planning and monitoring roles. The PIU will submit quarterly social safeguard progress and quality monitoring reports with yearly safeguard reviews, which will be carried out by independent consultants. These will form the basis for any improvements to be brought about in the safeguard policy framework and implementation arrangements.

9.2 Monitoring and Evaluation Arrangements

Under the M&E plan, two main components will be monitored. These include:

- Performance monitoring (internal monitoring); and
- Process monitoring/impact monitoring.

General monitoring indicators shall include the following:

- Public consultation;
- Grievance procedures in place and functioning;
- Timely execution of compensation arrangements; and
- Compensation to rightful persons.

Table 9.1 illustrates the general ARAP Monitoring and Evaluation Framework.

Table 9.1 *General ARAP Monitoring Framework*

Component Activity	Information /Data Collected	Collection Method	Frequency of Reporting	Responsibility
Performance Monitoring	Input, outcome indicators and budget	Compensation Implementation Reports	Quarterly	RIC
Impact Monitoring	PAPs satisfaction with inputs processes and outputs	Quarterly/Semi-annual surveys	Annually	External Consultant (Hired by PIU)

Table 9.2 Performance Monitoring

Issue	Indicator	Means of Verification	Monitoring Frequency	Responsibility
Baseline Census of PAPs	Confirmation of the census survey of PAPs in various categories	ARAP Inception Report	As required by the ARAP management team	Safeguards Specialist
Consultation/ Public meetings held	Public consultations	Minutes of Meetings, including pictures	As required by the ARAP management team	Safeguards Specialist
Compensation and Resettlement Assistance	Timely execution of compensation. Compensation rewarded to the correct parties	Field Survey	Monthly or as required by the ARAP management team.	Safeguards Specialist
Grievance Mechanism	Grievance procedures in place and functioning	1. Grievance Resolution Report, including resolution forms 2. Interviewing aggrieved affected people	Monthly or as required	Safeguards Specialist
Monitoring and Evaluation	Monitoring and evaluation reports submitted	Field Survey	Monthly or as required	Safeguards Specialist and M&E Specialist

10.0 BUDGET ESTIMATES

The general budget estimates for the project includes compensation for affected structures as well as communication and monitoring of the APAP process. The overall estimated cost for implementation of the ARAP is GHS1,375,191.31 (USD275,038.26 equivalent) (Table 10.1). GoG will be responsible for payment of the compensation covering all structures and costs for implementation of the ARAP.

Table 10.1 Budget for the Implementation of ARAP

Description	Amount (GHS)
1) Public information/media advertisement	10,000.00
2) Implementation phase consultation with PAPs on compensation payment	30,000.00
3) Compensation for affected properties	546,143.70
4) Compensation for loss of land	381,562.50
5) Compensation for land acquired for refuse dumping	297,000.00
6) Grievance redress and dispute resolution (Transportation and allowances)	20,000.00
7) Monitoring and Evaluation (Independent Consultant)	25,000.00
8) Contingency (5%)	65,485.31
Total	1,375,191.31

10.1 Sources of Funding

The Constitution of Ghana indicates that people affected by compulsory acquisition have to be adequately compensated. This forms the basis for the commitment of the Government towards compensation of PAPs for the proposed capping project. The cost for the implementation of this ARAP will be borne by the Government of Ghana. The MSWR being the project implementing agency will request for the release of the compensation funds from the Ministry's Capital Account for payment.

11.0 DISCLOSURE

Following the Bank's clearance, the ARAP will be disclosed in Ghana by MSWR on its website. Copies of the report would be made available at the MSWR head office and the office of the Chief Director. Copies will also be made available at GEMA offices and also given to the Abloragyei Residents' Association. The document will also be disclosed electronically on the Documents and Reports database of the World Bank Website.

REFERENCES

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APPENDICES

- Appendix 1 Introductory Letter

- Appendix 2 Data Collection Instruments

- Appendix 3 Cut-off Date Notice

- Appendix 4 Consultation with GEMA

- Appendix 5 Consultation with Abloragyei Family and Opinion Leaders

- Appendix 6 Consultation with PAPs Abloragyei Resident Association

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APPENDIX 1

Introductory Letter

In case of reply the Number and Date of this letter should be Quoted .	 Republic of Ghana	Ministry of Works and Housing P.O. Box M. 43 Accra - Ghana DAS: GA-144-0550
My Ref. No <u>SOR/KS.98/200/2</u>		20-11-2018
Your Ref. No		

TO WHOM IT MAY CONCERN
GREATER ACCRA RESILIENT AND INTEGRATED DEVELOPMENT PROJECT (GARID)
- INTRODUCTION OF CONSULTANT UNDERTAKING RESETTLEMENT ACTION PLAN FOR THE PROPOSED CAPPING OF THE ABLORAGYEI DUMPSITE IN GA EAST MUNICIPALITY

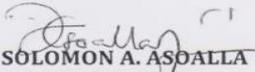
The Ministry of Works and Housing under the Greater Accra Resilient and Integrated Development Project (GARID) has recruited Mr. Yaw Osei-Amoyaw and his team of environmental consultants from November to December 2018 to undertake a Resettlement Action Plan (RAP) for the proposed Capping of the Abloragyei Dumpsite in Ga East Municipality.

The objective of the GARID project is to address key drivers contributing to poor living conditions including high flood impacts in Odaw Basin of Greater Accra Region. It will focus on improving drainage, solid waste management and provision of services and infrastructure in priority flood prone informal settlements.

This RAP will propose measures to mitigate the impacts of involuntary resettlement on the local population. The RAP will detail the full scope of project impacts relating to displacement and involuntary resettlement on the local population and propose mitigation measures for addressing the impacts prior to commencement of works.

The assignment requires Mr. Osei-Amoyaw and his team to conduct consultations with a range of key stakeholders towards the preparation of the RAP. The stakeholder consultations are a mandatory component of the RAP processes and your participation in this regard would enable the consultant conclude this assignment in a timely manner.

The Ministry of Works and Housing appreciates your cooperation.


SOLOMON A. ASOALLA
CHIEF DIRECTOR
FOR: MINISTER

APPENDIX 2

Data Collection Instruments

Appendix 2.1 Engagement Issues with GEMA

Issues	Comment
Awareness of dump site capping and initial concerns and comments	
What are your concerns or comments on this RAP assignment being undertaken?	
Ownership of dumpsite	
Who owns the dumpsite land?	
Documentation on land ownership	
What will be the ownership and management arrangement for the dumpsite after capping?	
District demographic information	
Population of the district	
Employment types and figures	
Average incomes from various occupations	
Average household size	
Fertility rate	

Appendix 2.2 Engagement Issues with Community/Residence Association

Issues	Comments
Main livelihoods activities in the community	
Water supply sources, types, quality and availability to the community	
Waste disposal options and dumpsites	
Toilet facilities and indiscriminate defecation	
Markets in the community	
Educational Facilities and access to education	
Common Diseases and Access to Healthcare Services	

Appendix 2.3 Engagement Issues with Traditional Authorities

Issues	Comments
What are your key concerns and expectations of the RAP process	
Was compensation paid by the government in the 1960s for the acquisition of dumpsite land and adjoining areas?	
Any documented policy/agreement to prove that the erstwhile Kufour Government returned unused state acquired lands to original owners/families?	
Expected benefits from post-cap use of the dumpsite?	

Appendix 2.4 Engagement Issues with Adjoining Businesses

Business location/address	
Issue	Comments
Type of business	
Year of commencement	
Business ownership	
Ownership of business operating space (land)	
Payment of rent	
Business registration	
Payment of tax	
Operating period (hour/day and days/week)	
Average daily sales	
Number of dependents	
Number of workers	
Electricity connection	
Pipe-borne connection	
Are you aware of the proposed capping exercise?	
Effects of the project on livelihood?	
Preferred compensation?	
Other concerns	

Appendix 2. 6 Questionnaire for PAPs

A PERSONAL INFORMATION											
1	Name of Respondent										
2	Residential Address / Phone no										
3	Sex			Male			Female				
4	Age	Under 18 []		18 – 25 []		26 – 40 []		41– 50[]	Above 50 []		
5	Marital status	Single []		Married []		Divorced []		Widowed []			
6	Number of dependents	1		2		3		4	5		
7	Employment	Fishing & related		Sales	Professionals		Artisans	Casuals	Others		
8	Average monthly income (GHS)	<100		100-500		500-1000		>1000			
9	Next of kin (Name/Contact)										
11	Highest level of education	Primary	JHS		SH S	Post Sec.	Tertiary	None	Other		
12	Ethnic group	Akan	Ga-Adangbe		Ewe	Mole Dagomba		Other, specify			
13	Religion	Christian		Muslim		Traditionalist		Other			
14	Status of property	Fenced wall	Foundation	Completed	Uncompleted	Partly Completed		Bare land			
15	What are your waste disposal options		Waste collectors		Dump on dumpsite		Burn near house		Other		
16	Where do you live		On								
17	How was the dump disturbing you		Smoke		Mosquitoes						
18	Were you part of the protest to end dumping										
19	View of the project										
20	When was the land acquired										
21	Who sold the land to you										
22	What was the state of the area when the land was purchased										
23	How much was paid for the land										
24.	How much do you spend (monthly) on:			Nil	<20	20-49	50-99	100-299	300-599	600-999	Other
	a. Housing (rent)										
	b. Food										
	c. Water										
	d. Energy (Electricity)										
	e. Education (school fees, books, uniform, etc)										
	f. Health/Medical Expenses (NHI)										
	g. Clothing										
	h. Social events (funeral, marriage, outdooring, festivals)										
	i. Entertainment (drinking, smoking, womanizing, etc.)										

APPENDIX 3

Cut-off Date Notice



APPENDIX 4

Consultation with GEMA

Venue: CEHRT Consulting Office	Date: 11-01-2019	Time: 10.50 am –11.30am
Participant <ol style="list-style-type: none"> 1. Hon. Janet Tulasi Mensah – MCE 2. Alex Amoah - DPO 3. Yaw Amoyaw-Osei 4. Godfred Allotey 5. Nana Kesewa Akesseh 		
Issues	Response	
Ownership of dumpsite	<i>The 50-acre land where the dumpsite is located belongs to PnT, which was acquired by government decades ago. Amanee and Honest cannot claim ownership, they have no certified documentation backing their claims, and as such should not be entertained.</i>	
What will be the ownership and management arrangement for the dumpsite after capping	<i>The government owns the land and the assembly will manage the site after capping</i>	
Does GEMA have documentation (e.g. site plan, indenture) of ownership of the dumpsite?	<i>The assembly will write to the local government concerning land ownership. Documentation can be obtained from the Lands Commission proving the assembly's ownership. Previous meetings have been held with the World Bank, where other stakeholders such as Lands Commission, EPA and MSWR were present, to determine ownership of the land. Lands Commission confirmed the land belongs to P&T.</i>	

APPENDIX 5

Consultation with Abloragyei Family and Opinion Leaders

Venue: Abloragyei Chief Residence		Date: 03-01-2019	Time: 11am – 12 noon
Participant <ol style="list-style-type: none"> 1. Isaac Nii Ablor (Abloragyei Chief) - 024414437 2. Alhaji Baba Pantang – 0244244303 3. Ben Johnson - 4. Alidu Mohammed – 024456306 5. John Obeng Agyeman – 0242541196 6. Yaw Amoyaw Osei - 0247062902 7. Prince Ofori-Boateng – 0244985953 8. William Amerlorku - 02431936 			
Issues	Response		
Introduction of the project	<p><i>The GoG has acquired a facility from the World Bank to cover the Abloragyei Dumpsite, to prevent further leachate and waste pollution of the Dakobi Stream that discharges into the Odaw channel. The project will involve the construction of drains, access road and creation of green belt around the dumpsite.</i></p>		
Origin of the Dump	<p><i>The dumpsite and surrounding areas was initially acquired by the government in 1967 for the P&T Corporation. But the land was not utilized and turned into sand wining grounds, which created pits.</i></p> <p><i>The opinion leaders and the chief of Abokobi sometime ago brought some investors from Europe to generate electricity from the Dumpsite, but the project couldn't materialised because of low quantities of waste. So it was agreed that dumping should continue till enough quantities of waste are generated for electricity generation.</i></p> <p><i>However, as the population increased, the situation at the dump got out of hand due to the health risks the smoke and stench from the dump brought to neighbouring residence. According to a health expert, children leaving the community risks developing respiratory infections. The opinion leaders together with the Pantang Hospital protested to the dumping of waste, including liquid waste to the site.</i></p>		
Identification of properties to be affected by the project	<p><i>Only properties very close to the dump will be earmarked for demolition. The MSWR want to minimise the loss of properties from the project implementation. However, the opinion leaders will be involved in the determination of the boundaries of the project and identification of properties to be affected. The demarcation of the project foot print will be done on the 4th of January, 2019. There will be a cut-off date which will be determined by all the relevant stakeholders.</i></p>		
Dissemination of information to property owners around the dump	<p><i>The chief and the pinion leaders of community support the project and will inform property owners around the dump and other residents.</i></p>		

APPENDIX 6

Consultation with PAPs and Abloragyei Resident Association

Venue: Abloragyei Chief Residence		Date: 02-02-2019	Time: 9am- 10am
Participant Mubarak Mumuni - 0246746185 Solomon Mensah - 0545877890 Yusif Iddris – 0558713857 Saed Abdullah – 0546173700 Suleman Musah – 0268359317 Christian Diaba – 02460888303 Hadir Mohammed – 0244622642 Fred Adzumah – 024938012 Shafui Mohammed - 0244680773 Osman Suleman - 0249616311 Bismark Eduafo – 0246296636 Amanee Acheampong –			
Issues	Response		
Introduction of the project	<i>The GoG has acquired a facility from the World Bank to cover the Abloragyei Dumpsite, to prevent further leachate and waste pollution of the Dakobi Stream that discharges into the Odaw channel. The project will involve the construction of drains, access road and creation of green belt around the dumpsite.</i>		
Compensation of PAPs	<i>All identified PAPs will be compensated before the commencement of the project. The valuation figures for affected properties will be presented to the PAPs during today's meeting. PAPs will have right to refuse compensation offered, and can bring in his or her valuer to contest the figures presented.</i>		
Formation of project implementation and grievance committees	<i>There will be a project implementation and grievance implementation committees for the project. The project implementation will be in-charge of the execution of the project. They will liaise with the project contractor and the PIU. Members of the board will include PAPs and members of the Association. The Works Engineer and the Development Planning Officers of GEMA will be part of the committee. There will be a three tier grievance redress committee/</i>		

APPENDIX 7

Consultation with Abloragyei Chief

Venue: CEHRT Consulting Office	Date: 11-01-2019	Time: 10.50 am –11.30am
Participant		
<ol style="list-style-type: none"> 1. Isaac Nii Ablor (Abloragyei Chief) - 2. Yaw Amoyaw-Osei 3. Prince Ofori-Boateng 		
Issues	Response	
Land Ownership	<p><i>GEMA claims that the dumpsite and its surrounding was part of the land acquired by the erstwhile P&T Corporation for the installation of radio receiving station. However, according to the Abloragyei Chief, the government acquired a vast land in Abokobi, Pantang and Abloragyei from the Ablor family other three families for the P&T. The Ablor family land was registered in 1963 under the name Joshua Anum Tope. However, the Ablor family receive the least amount (GHS 3000 old currency) of compensation among the families the lands were acquired from. The corporation built facilities, such as residential homes and warehouses in the other three sites acquire, but the nothing was done on the land acquired from the Ablor family, because not all portions of the family land was released to them. Kufuor's regime the late 2000s released all unused government land to its original family, hence the family assumed ownership of the land.</i></p>	
Origin of the Dump	<p><i>The land was tuned into sand wining grounds since the government didn't utilise the land. The family gave the land to the then Assembly Member of Pantang in the 1990s and GHS200 old currency was paid to the family, however no formal agreement was made. Other private waste management companies, such as Amanee Waste, Honest Waste and Kwayie Waste acquired sections of the land for waste dumping. Zoomlion Ghana Limited also acquired some section and used to pay monthly rent to the family.</i></p>	
Closure of the Dumpsite	<p><i>The dumpsite was closed about two years ago following protest by the neighbouring residents.</i></p>	
How to treat waste management companies owning portions of the land.	<p><i>They should be duly compensated</i></p>	
Post-cap use of the land	<p><i>The assembly is proposing a gym, astro turf, event centre and other recreational facilities, which will generate the income</i></p>	
Post-cap management of the dump	<p><i>The family is prepared to negotiate with GEMA on the post management of the dump, including sharing of proceeds to be accrued from the use of the capped land.</i></p>	

APPENDIX 8

World Bank, GEMA and Consultant Meeting

Venue: Abloragyei Chief Residence		Date: 01-02-2019	Time: 10am – 12 noon
Participant 1. Alex Amoah – DPO – 0244516173 2. Saani Ibrahim – Survey and Mapping – 0244465817 3. Harold Esseku – World Bank - 0208117978 4. Dr. Ohene Sarfoh – GARRID – 0246489796 5. Adam Babatu - World Bank – 0244853705 6. Peter Barhlano – Works Engineer, GEMA - 0248387856 7. Yaw Amoyaw Osei – Consultant -0243223864 8. Prince Ofori Boateng – Consultant – 0244985933			
Issues	Response		
Resolving Land Issues	<i>The consults should reorganise claims to land by PAPs and assess such lands for compensation payment. However, claimants to land would be made to show documentary proof of ownership of map. The waste management companies (Amanee Kwayie and Honest Waste) should also be compensated for land.</i>		
Conducting Search	<i>GEMA should conduct a search to prove P&T ownership of the land.</i>		
Proceeds from post cap use	<i>There should be mutual agreement between GEMA and the Ablor family on how proceeds from the post-capped land use of the capped dump should be shared as in the case of Ogbojo capped dump where the Assembly reached an agreement on how proceeds from the capped dump should be shared.</i>		
Completion of the ARAP	<i>The ARAP should be completed as soon as possible and submitted on or before 6th February 2019.</i>		

APPENDIX 9

Grievance and Resolution Form

Name (Filer of Complaint):

.....

ID Number (PAPs ID number):

Contact Information (house number/ mobile phone):.....

Nature of Grievance or Complaint:

Date	Individuals Contacted	Summary of Discussion
------	-----------------------	-----------------------

.....

Signature..... Date:

Signed (Filer of Complaint):

Name of Person Filing Complaint (if different from Filer):

Position or Relationship to Filer:

Review/Resolution

Date of Conciliation Session:

Was Filer Present?: Yes [] No []

Was field verification of complaint conducted? Yes [] No []

Findings of field investigation:.....

Summary of Conciliation Session Discussion.....

Issues.....

Was agreement reached on the issues? Yes [] No []

If agreement was reached, detail the agreement below:

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

.....

.....

Signed (Conciliator): Signed (Filer):

Signed:

(Independent Observer)

Date:

APPENDIX 10

Entitlement Matrix for Structure Compensation

Code	Name	Contact	Sex	Description	Impact	Picture
AB/001	Solomon Mensah	0545877890	M	Wooden structure for drinking spot	Temporary closure/loss of livelihood/business	
AB/002	Suleman Musah	0268359317	M	Wooden board cladding,	Total demolishing of structure	
AB/003	Yusif Iddris	0558713857	M	Uncompleted residential property	Total demolishing of structure	

AB/004	Osman Suleman	029616311	M	Sandcrete blockwork rendered and painted internally, porcelain floor tiles, sliding glazed window, security/panel doors, plastic T & G ceiling	Total demolishing of structure	
AB/005	Laila Mohammed	0246423695	M	Bare floor (0.15 acre of land)	Compulsory acquisition	
AB/006	Saed Abdullah	0546173700	M	Sandcrete blockwork	Partial demolishing of fence wall	

AB/007	Saed Abdullah & Hafisu Adam	0546173700	M	Foundation footing	Total demolishing of footing	
AB/008	Suwaba Issah Tahiru	0249941942	F	Wooden kiosk for selling food	Temporary Closure/loss of livelihood/business	
AB/009	Justina Mendis	0546268610	F	Foundation footings	Total demolishing of structure	
AB/010	Christian Diaba	0260888303	M			

AB/011	Amanee Acheampong	0245378571	M	Sandcrete blockwork rendered and painted, plywood board ceiling and CIS roof	Total demolishing of structures	
AB/012	Amanee Acheampong	0245378571	M	Toilet facility Sandcrete blockwork rendered, cement screed floor, CIS Roof		
AB/013	Richard Offei	0555517856	M	Wooden shed, CIS roof Plywood Boards with battens, wooden	Total demolishing of structures	

AB/014	Hadir Mohammed	0244622642	M	Oversite concrete, foundation wall and Sandcrete blockwork and iron rod reinforcement	Total demolishing of structure	
AB/015	Shafui Mohammed	0244680773	M	bare floor (2 plots)		
AB/016	Henry Mawutor	0244781261	M	Foundation footing, Sandcrete blockwork with iron rod reinforcement	Total demolishing of fence wall	

AB/017	Abass Morlor	0208830451	M	Bareland		
AB/018	Fred Adzumah	0242938012	M	Foundation footing, Sandcrete blockwork, iron rod reinforcement	Total demolishing of fence wall	
AB/019	Shafui Mohammed	0244680773	M	Bare land		
AB/020	Jacob Adjei Ablor	0209758235	M	Foundation footing, Sandcrete blockwork, iron rod reinforcement	Demolition of structure	

AB/021	Mr. Hagan	0244755198	M	Sandcrete blockwork with reinforced concrete	Demolition of fence wall	
AB/022	Mubarak Mumuni	0246746185	M	4 bedroom house	Temporary loss of accommodation	

APPENDIX 11
Entitlement Matrix for Land Compensation

Name of Claimant	Ref. of Claimant	Reference Code	Land Size	No. of Plot
Suleman Musah		AB/002		1
Yusif Iddris		AB/003	0.12	1
Osman Suleman		AB/004	0.12	1
Laila Mohammed	Mohammed Abdul Majeed	AB/005	0.12	1
Saed Abdullah		AB/006		1
Saed Abdallah & Hafisu Adam		AB/007	0.16	1
Suwaba Issah Tahiru	Osei Adjetey	AB/009	0.16	1
Christian Diaba		AB/010	0.16	1
Amanee Achaempong		AB/011	0.16	1
Amanee Achaempong		AB/012	0.16	1
Richard Offei		AB/013		1
Hadir Mohammed	Shafui Mohammed	AB/014	0.16	1
Shafui Mohammed		AB/015	0.14	1
Henry Mawutor		AB/016	0.14	1
Fred Adzumah		AB/018	0.14	1
Shafui Mohammed		AB/019	0.14	1
Jacob Adjei Ablor	Abass Morlor	AB/020	0.14	1
Mr. Hagan	Godwin Morladza	AB/021	0.14	1
Abass Morlor		AB/17	0.06	1
Honest Waste		Honest Waste	2.24	14
Amanee Waste		Amanee Waste	5.6	35
Kwayie Waste		Kwayie Waste	0.8	5

NB:

AB/001, AB/008 and AB/022 will not be entitled to land compensation because they are only temporarily affected.

The structure AB/013 is situated on a land belonging to AB/014 who will receive compensation for affected land.

The location of the kraal, belonging to AB/002, is part of the dump.

The land on which the affected section of the wall is situated, belonging to AB/006, is part of the dump.

APPENDIX 12

Consultation with Environmental Protection Agency

Venue: EPA Office, Head	Date:13-07-2018	Time: 3pm – 4pm
<p>Participant</p> <p>Kwabena Badu-Yeboah Yaw Amoyaw-Osei – 0247062902 Prince Ofori-Boateng – 0244985953</p>		
Issues	Comment	
Permits required to extract large quantities of capping material?	<i>A Preliminary Environmental Assessment will be required. However, if the location is a sensitive site, an Environmental Impact Assessment will be required.</i>	
Obtaining capped materials from construction site or dredging materials?	<i>If there is no use for the excavated material, it will be a good source. Excavate materials from construction sites are normally duped indiscriminately, e.g. construction waste from the Marine Drive Project is being dumped at the Ramsar Site at Weija. The physical planning department of MMDA can help identify construction activities excavating large quantities of earth materials.</i>	
Mechanisms to receive excavated and dredged spoil materials?	<i>There should be a dedicated location to stockpile capped materials.</i>	
Traffic impacts from conveying capped materials?	<i>There should be a traffic count baseline to assess the potential traffic impact from the project implementation. If the source of the capping material is from the Aburi or Dodowa and its environs, there will be no need to conduct traffic count. However, if the materials are coming from westwards from Accra, a traffic count will be required for the Pantang site.</i>	
Responsibility for sourcing the capping material	<i>The Contractor's</i>	
Land use enforcement	<i>EPA has sent eviction notice to unauthorised developments around the Agboglobhie dumpsite, but the city authority (AMA) failed to collaborate. The only option was to apply for a court suit for eviction.</i>	
Compensation of project affected persons (PAPs)	<i>The project is likely to trigger World Bank's involuntary resettlement. A separate resettlement action plan should be prepared to meet the Bank's standard. The compensation should also follow the applicable laws and provisions in the country's constitution and statutes.</i>	