

INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPMENT
INTERNATIONAL DEVELOPMENT ASSOCIATION

THIRD PROGRESS REPORT
ON THE IMPLEMENTATION OF MANAGEMENT'S ACTION PLAN
IN RESPONSE TO THE
INSPECTION PANEL INVESTIGATION REPORT No. 47713-GH
ON THE

GHANA
SECOND URBAN ENVIRONMENTAL SANITATION PROJECT
(IDA CREDIT No. 3889-GH)

OCTOBER 15, 2015

ABBREVIATIONS AND ACRONYMS

AMA	Accra Metropolitan Assembly
COHRE	Centre on Housing Rights and Evictions
CSO	Civil Society Organization
DCA	Development Credit Agreement
DfID	Department for International Development (UK)
EA	Environmental Assessment
EMP	Environmental Management Plan
FY	Fiscal Year
GAMA	Greater Accra Metropolitan Area
GIM	Ghana Innovation Marketplace
GoG	Government of Ghana
IDA	International Development Association
IEC	Information, Education and Communication
IFAWAMI	Inter-Faith Waste Management Initiative
IPN	Inspection Panel
ISR	Implementation Status Report
ISWMS	Integrated Solid Waste Management Strategy
MA	Metropolitan Assembly
NACONWAM	National Coalition of NGOs in Waste Management
NDF	Nordic Development Fund
NGO	Nongovernmental organization
OP	Operational Policy
RAP	Resettlement Action Plan
SEA	Strategic Environmental Assessment
UESP II	Second Urban Environmental Sanitation Project

Ghana
Second Urban Environmental Sanitation Project

Third Progress Report
Implementation of Management Action Plan

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I. Introduction

1. This is the Third and final Progress Report to the Board of Executive Directors on the implementation of Management's Action Plan in response to the Inspection Panel Investigation Report No. 47713-GH on the Ghana Second Urban Environmental Sanitation Project (IDA Credit No. 3889-GH).

2. On August 22, 2007, the Inspection Panel registered a Request for Inspection, IPN Request RQ07/06, concerning the Second Urban Environmental Sanitation Project (UESP II) in Ghana. The Request was submitted by the Accra-based Centre on Housing Rights and Evictions (COHRE) on behalf of the Agyemankata community, which lives in the area known as Kwabenya within the Greater Accra Metropolitan Area (the Requesters). The Request focused on one of the sub-components of the overall Project, namely the proposed Kwabenya sanitary landfill. The Requesters claimed that the Bank failed to comply with its policies and procedures; specifically, they were concerned about involuntary displacement and health risks to those who would remain in the vicinity of the proposed sanitary landfill. Management submitted its response to the Panel on September 21, 2007. The Panel found the Request eligible and recommended an investigation, authorized by the Executive Directors on November 9, 2007.

3. The Panel issued its Investigation Report on March 13, 2009. The Panel found instances of noncompliance with provisions of the policies on Environmental Assessment (OP 4.01), Involuntary Resettlement (OP 4.12) and Project Supervision (OP 13.05). Specifically, the provisions relate to the analysis of alternatives, the analysis of impacts in the area of influence of the Project, environmental management plans and resettlement planning, as well as supervision of compliance with Bank safeguard policies.

4. On May 1, 2009, Management submitted its Response to the Inspection Panel's Investigation Report for consideration by the Executive Directors. The Investigation Report and the Management Report and Recommendation (INSP/R2007-0006/2) were discussed by the Board on June 18, 2009. The Board approved the proposed Management Action Plan (the Action Plan), as summarized in Table 1, and requested Management to report back on its implementation.

5. The First Progress Report to the Board was submitted in August 2011. As noted in that report, the Government of Ghana (GoG) decided not to proceed with the construction of the Kwabenya landfill. As a result, some of the actions agreed were no longer required or applicable. However, the Report indicated that Management had informed the GoG that it remained obligated to comply with the Bank's safeguard policies in the event it decided to carry through with the expropriation of land at Kwabenya that had been initiated under the Project.

6. A Second Progress Report to the Board was submitted in June 2012. As noted in that report, all proposed Management Actions not related to the Kwabenya site had either been completed or were nearing completion. With respect to the Kwabenya site, the remaining issues at the time of the Second Progress Report related to the GoG's decision to complete the expropriation initiated in connection with the original design of the Project (notwithstanding its decision not to build a landfill at the site), rather than to reverse the expropriation and restore land rights to the affected people. As noted in the Report, the GoG submitted a request to use credit proceeds to pay the

compensation for the 76 inhabited structures identified in the draft Resettlement Action Plan (RAP), while committing to pay for the land from its own funds. Management authorized the use of credit proceeds to pay for the compensation, as requested by the GoG. Management also authorized a 7 month extension of the closing date, i.e., through December 31, 2012, in order to allow for the appropriate processing of payments in accordance with Bank safeguards.

7. As explained below, since submission of the Second Progress Report, actions on the part of the GoG to complete the expropriation at Kwabenya have completely stalled. No compensation under the RAP has been accepted by the affected people, and some of them have continued to build on the land. This reflects an intent of the affected people to contest the expropriation and to seek to remain in place. ***In light of changing circumstances on the ground, the GoG informed the Bank in June 2015 that it has reversed its earlier decision, and will instead revoke the Executive Instrument on which the expropriation was based, thereby restoring rights to the affected people.*** While Management considers it regrettable that this decision was delayed for so long, in Management's view this is a very positive development, which effectively resolves the concerns of the requesters and the outstanding issue from the Action Plan.

II. Project Summary

8. Over the past two decades, the key environmental issue in urban areas of Ghana has remained poor sanitation, resulting from inadequate sanitary facilities, drainage and solid waste management. The situation is becoming more critical due to rapid population growth in metropolitan areas, particularly in Accra. An IDA Credit (US\$62.0 million equivalent) for UESP II was approved by the Board of Executive Directors in April 2004. The Project's development objective was to improve urban living conditions in regard to environmental health, sanitation, drainage, vehicular access and solid waste management in a sustainable fashion, with special emphasis on the poor. Project implementation progressed well after some initial delays and all activities were completed, except for the construction of the proposed Kwabenya sanitary landfill, by the December 31, 2012 Project closing date. Out of the US\$62 million of the credit, the Project disbursed US\$60.6 million and it substantially achieved its development objective.

9. Accra's need for a sanitary landfill was first identified in the Strategic Plan for the Greater Accra Metropolitan Area (GAMA) in December 1992. Out of 18 candidate sites initially assessed, Kwabenya was considered the most suitable location. In 1997, the United Kingdom's Department for International Development (DfID) funded feasibility studies and preliminary design at Kwabenya, including an Environmental Impact Assessment (completed in March 2000), which confirmed the suitability of the Kwabenya site as the best alternative. The Bank's environmental and social assessment for UESP II, completed in 2003, included an update of the DfID funded Environmental Impact Assessment. Except for the preliminary civil works (drainage and access road) funded by DfID, which were completed in 2001, development of the Kwabenya landfill never took place due to delays caused by long standing opposition to the landfill by members of the Agyemankata community.

10. In May 2007, the Bank team determined that it was necessary to prepare a new Environmental Assessment (EA) that would focus on the urgent, short-term need for solid waste disposal in Accra, including the possible use of the Kwabenya site for a sanitary landfill. This decision was based on the time elapsed since the original EA was prepared. The principal activities

for Kwabenya financed under the UESP II included the preparation of a RAP and the new EA. The RAP was substantially completed in 2009, but the Accra Metropolitan Assembly (AMA) decided not to disclose it until the EA was completed, in order to incorporate any changes that could result from the EA. However, the preparation of the EA was stopped following the decision made by the GoG in October 2010 to abandon the development of a landfill at Kwabenya, as explained in the First Progress Report submitted to the Board in August 2011.

III. Management Action Plan

11. In response to the issues raised in the Panel Report, Management proposed an Action Plan that consisted of a three-pronged approach to address the need for responsible solid waste management in Accra. The *first* was the preparation of an Integrated Solid Waste Management Strategy (ISWMS). The objective of this study was to identify and analyze a range of waste management options for the GAMA for the *medium to long term*. The ISWMS was expected to form the basis of a new Solid Waste Master Plan for Greater Accra. The *second* was to provide support to the Borrower to prepare the new EA, which was to focus its attention on meeting the *urgent and short-term* needs for solid waste management, including analysis of the feasibility of the proposed Kwabenya landfill and the examination of alternatives. The *third* prong of the Action Plan consisted of several activities aimed at providing institutional capacity building for local government and for civil society organizations (CSOs) with active interest in sanitation issues. A detailed overview of the Action Plan items and their progress can be found in Table 1 (Overview: Management Action Plan Implementation Progress).

IV. Progress of Management Action Plan Implementation

12. **Overview.** As indicated in the First Progress Report, the GoG decided in late 2010 to abandon the development of the Kwabenya landfill. Consequently, some of the key activities of the Action Plan such as the preparation of the EA and the RAP for the Kwabenya site were no longer required and hence not implemented. Nonetheless, as also highlighted in that Report, there were certain outstanding issues concerning Project-related expropriation actions taken by the GoG at Kwabenya that required resolution in line with the Borrower's obligations under the Development Credit Agreement (DCA). Efforts to resolve this matter included a restructuring of the Project to allow the use of credit proceeds to pay compensation to the inhabited structure owners, following the decision of the GoG to keep the land originally intended for the landfill. Other items of the Action Plan included the preparation of the ISWMS and the implementation of activities designed to increase the institutional capacity of local government and raise community awareness on sanitation issues.

13. **ISWMS.** Preparation of the ISWMS, partially funded by the Nordic Development Fund (NDF), was completed on time, i.e., before the end of December 2010. Because the EA was cancelled, the consultations that had been expected to provide additional feasible alternatives for the mid- and long-term solutions to solid waste management and disposal in Accra did not occur, and thus such alternatives could not be included in the ISWMS. Although the AMA organized consultations with stakeholders at the sub-metro¹ level, given the need to include the eleven²

¹ Each of the eleven administrative subdivisions of AMA.

² They include: two Metropolitan Assemblies, Accra and Tema; and nine Municipal Assemblies, Ga West, Ga East, Ledzokuku-Krowor, Adentan, Ashiaman, La Nkwantanang-Madina, Ga Central, Ga South and La Dade-Kotopon.

metropolitan and municipal assemblies that constitute the GAMA in development of a strategy, an integrated metropolitan solid waste management strategy was included under the GAMA Sanitation and Water Project approved by the Board of the World Bank on June 6, 2013.

14. **Institutional Capacity Support.** Several activities were proposed in the Action Plan as part of institutional capacity building. These activities included: technical assistance and clinics for municipal officials; promotion of community awareness and involvement in solid waste management; and development of social accountability mechanisms by NGOs that work on sanitation issues in Ghana. The two workshops on solid waste management that were organized in October 2011 for municipal officials with emphasis on the operation of landfills, which were described in the Second Progress Report, were followed up by hands-on training as part of the start-up of the Tema and Takoradi landfills. Clinics on safeguards have continued to be organized by Bank Social Development Specialists for Project Implementation and Coordination Units to refresh and improve staff knowledge. Following the success of the Ghana Innovation Marketplace (GIM), a competition of ideas aimed at improving solid waste management was organized in 2011 under the theme: “Solid Waste: Big Problem! Big Opportunity!” A new similar competition will be organized with support from the GAMA Sanitation and Water Project, which was declared effective on August 7, 2014. The Bank has also sponsored several workshops and meetings with regard to promoting social accountability in the provision of waste management and water services. In particular, the Bank introduced “Taarifa,” a tool developed on a Smartphone-based ICT platform for citizen-based monitoring of services delivery, which will be implemented with the help of CSOs and support from the GAMA Sanitation and Water Project.

V. GoG Decision to Reverse the Expropriation Process at Kwabenya

15. *As explained in the previous Progress Reports, in anticipation of the landfill being constructed at Kwabenya, the GoG issued an Executive Instrument (Executive Instrument) in January 2007 that effectively expropriated the land from existing owners and lessees.* Although none of the land was inhabited at the time, some lessees had initiated construction of houses on their lots, which was halted by the issuance of the Executive Instrument. The timing of this expropriation was inconsistent with the Borrower’s obligations under the DCA, which required that any takings be conducted in accordance with a RAP prepared according to Bank safeguard policies. Preparation of a RAP was subsequently initiated, but because construction of the Kwabenya landfill was abandoned, the draft RAP was never completed. However, the Executive Instrument remained in effect, and since the Executive Instrument was issued during and because of the Project, Management took the position that there was a continuing obligation under the DCA to, either: (i) conclude the process and compensate affected people in accordance with Bank safeguards; or (ii) revoke the Executive Instrument and restore the rights of affected people. Management explained this position to the GoG in writing in February 2011.

16. *In April 2012 the GoG communicated to the Bank its decision to complete the expropriation of the Kwabenya site* (notwithstanding its decision to abandon the construction of a landfill) and requested the use of credit proceeds to pay compensation for the 76 inhabited structures, as noted above. The DCA was amended to include the compensation payments and the GoG submitted an updated Kwabenya Plan for Compensation that was reviewed and accepted as satisfactory by the Bank. In addition, a RAP consultant was retained by the GoG to facilitate the dissemination of information to affected people about compensation for lost assets and eligibility

for compensation, and arrangements were put in place by AMA for payment of compensation and processing of grievances.

17. ***After a 7-month extension of the closing date, the Project closed on December 2012. By April 30, 2013, none of the structure owners had claimed their compensation.*** Although the Plan for Compensation to structure owners had been updated to take into consideration inflation and other factors, as required by the Bank, a representative of the Agyemankata Community sent an email to the Bank's Country Director for Ghana indicating, *inter alia*, disagreement with the proposed compensation amounts.

18. ***This impasse persisted, and implementation by the GoG of the Executive Instrument stalled.*** The GoG abandoned efforts to pay compensation or to remove occupants from their land and structures. The consultant responsible for completing the RAP and facilitating its implementation reported to the Bank task team leader that most project affected people indicated that they were not interested in receiving full compensation for their structures because they did not intend to vacate the land. In the meantime, construction of houses in the affected area resumed and accelerated, and the GoG took no apparent steps to halt this activity. The resulting situation can thus be summarized as one of: (i) inaction on the part of the GoG in terms of completing the taking of land started by the Executive Instrument in 2007; and (ii) *de facto* behavior of project affected people in Kwabenya suggesting their intention to continue to claim rights to the land and structures.

19. ***In light of this, the Bank sent a letter to the Minister of Finance of Ghana on August 13, 2014.*** The letter referred to the GoG's 2012 decision not to revoke the Executive Instrument and to complete the acquisition of the land at Kwabenya. Since that decision had been communicated to the Bank, Management had repeatedly requested a status report on the extent to which this process had been completed and, if any steps were still pending, a time-bound plan for their completion.

20. Bank Management also indicated in the letter that it had come to its attention that house construction had resumed at the Kwabenya site, and that indeed, the pace of such activity appeared to be accelerating. Management asked the GoG to advise whether the process initiated by the issuance of the Executive Instrument remained feasible and desirable, or whether other options could be contemplated given what appeared to be changing circumstances.

21. ***The response of the Minister of Finance was considerably delayed; it was delivered to the Bank on June 25, 2015 after repeated inquiries.*** This letter indicates a reversal of the GoG's previous position. It states that the Ministry of Local Government and Rural Development has now advised that ***"the Executive Instrument be revoked and affected rights restored due to a number of factors, including encroachment and rapid pace of development at the proposed site."***

22. ***In short, the GoG has indicated its intention not to pursue the expropriation at Kwabenya. While Management considers it regrettable that this decision was delayed for so long, in Management's view this is a very positive outcome that effectively resolves the issue first raised in the Bank's letter to the GoG in April 2012.***

VI. Next Steps

23. This is the last Progress Report that Management submits concerning implementation of the actions of the Management Action Plan, as it has been completed. However, the Bank will continue to follow-up with GoG regarding the enactment of the cancellation of the Executive Instrument and issue a final note to the Board accordingly.

Figure 1. Site Map of the Proposed Kwabinya Site

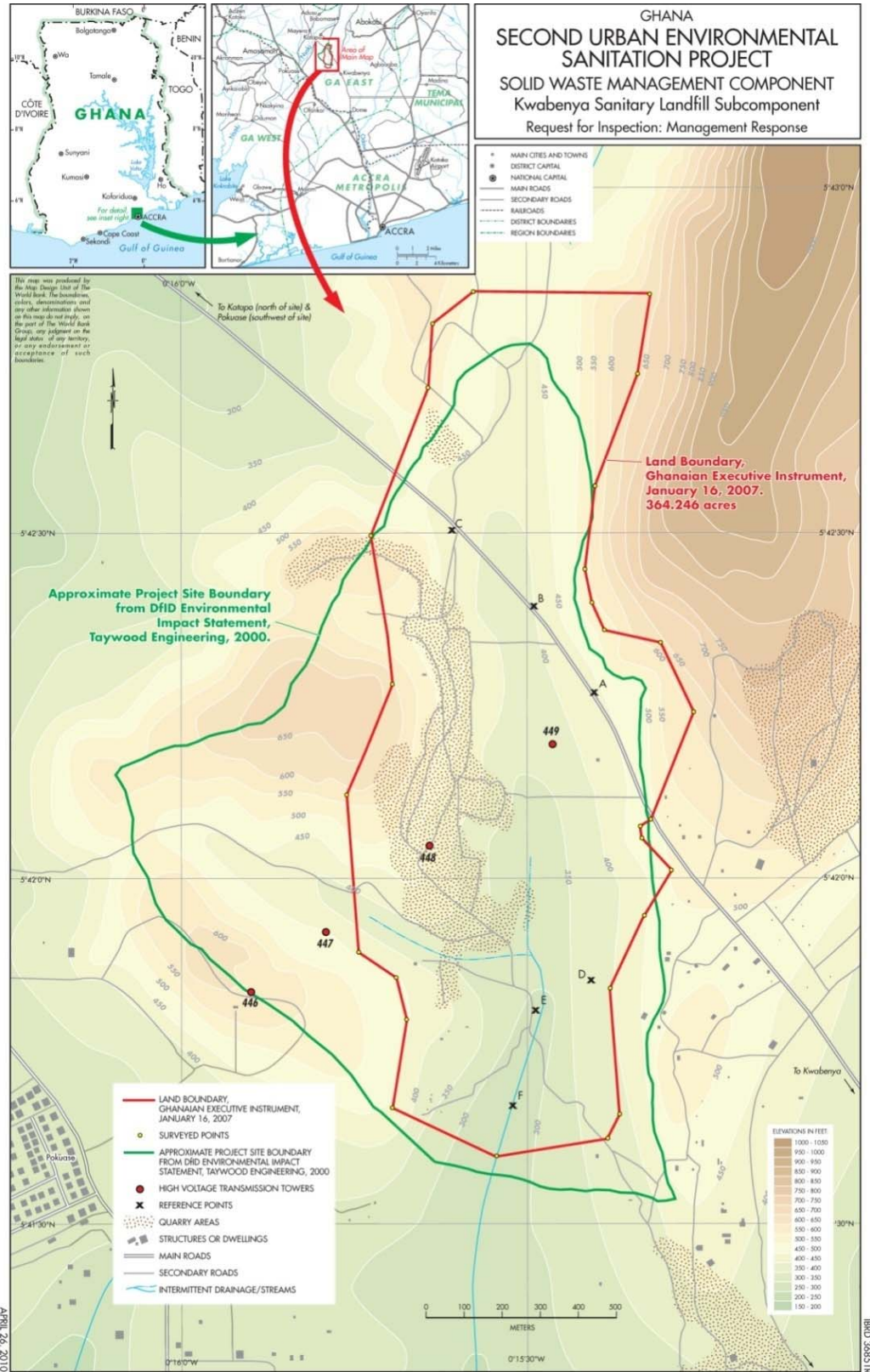


Table 1. Overview: Management Action Plan Implementation Progress

ISSUE	ACTION	IMPLEMENTATION PROGRESS
Environmental Assessment and Mitigation Measures		
Analysis of alternatives	<ol style="list-style-type: none"> 1. Per the Aide-Memoire of May 2007, a new EA will be prepared that will focus on the urgent, short-term need for solid waste disposal in Accra. 2. The Bank will also support an expansion of the scope and accelerate the preparation of the ongoing ISWMS for Accra. The EA will provide input into the ISWMS, based on the scoping conducted and alternatives examined. 3. The Bank will seek to support an SEA for the ISWMS. 4. Government is to appoint a Panel of Experts on all aspects of the Project relevant to the EA. 	<ol style="list-style-type: none"> 1. No longer required. The preparation of the EA was suspended following the AMA's decision to abandon the development of a sanitary landfill at Kwabenya in September 2010. This decision was endorsed by the GoG in a meeting chaired by the Minister of Local Government and Rural Development in October 2010 and formally communicated to the Bank in writing by MOFEP in August 2011. 2. Completed. Preparation of the ISWMS, partially funded by the Nordic Development Fund (NDF), was completed on time, i.e., before the end of December 2010. Because the EA was cancelled, the consultations that had been expected to provide additional feasible alternatives for the mid- and long-term solutions to solid waste management and disposal in Accra did not occur, and thus such alternatives could not be included in the ISWMS. Although the AMA organized consultations with stakeholders at the sub-metro level, given the need to include the eleven metropolitan and municipal assemblies that constitute the GAMA in development of a strategy, an integrated metropolitan solid waste management strategy was included under the GAMA Sanitation and Water Project approved by the Board of the World Bank on June 6, 2013. 3. No longer required. The preparation of the EA was cancelled following the decision to abandon the development of the landfill. 4. No longer required. The selection of a Panel of Experts to independently oversee the preparation of the EA is no longer required following the suspension of the EA.
Buffer Zone	<ol style="list-style-type: none"> 5. If the new EA identifies a sanitary landfill at Kwabenya as the preferred alternative, it will evaluate impacts within the landfill's area of influence outside the buffer zone and examine the size of the buffer zone in light of the situation on the ground, current internationally recognized good practice and the GoG's environmental guidelines. 	<ol style="list-style-type: none"> 5. No longer required. A buffer zone will not be required since there will be no landfill.
Environmental Management Plan (EMP)	<ol style="list-style-type: none"> 6. A draft EMP will be prepared as part of the new EA for whichever alternative is chosen to meet Accra's need for solid waste management in the near term. In accordance with good practice, details in the EMP will be identified and finalized as part of final engineering design and costing. 	<ol style="list-style-type: none"> 6. No longer required. An EMP will not be prepared since there will be no landfill and no EA will be required.

ISSUE	ACTION	IMPLEMENTATION PROGRESS
Consultation	<p>7. The AMA will disseminate a translation of the Draft RAP to the affected population. To supplement the Draft RAP, the AMA will produce an information pamphlet that summarizes entitlements to compensation and assistance, as well as grievance procedures, and distribute this to Project affected people.</p> <p>8. Upon finalization of the RAP and clearance by the Bank, the RAP will again be distributed to the affected population and disclosed in accordance with the Bank's Policy on Disclosure.</p>	<p>7. Completed. Although the GoG confirmed in writing its decision to abandon the development of a sanitary landfill at Kwabenya, the obligation to comply with the Bank's Policy on Involuntary Resettlement (OP 4.12) remained. As explained to the GoG via letter dated February 25, 2011, since an Executive Instrument (Executive Instrument) was issued during and because of the Project, the obligation under the DCA to compensate affected people in accordance with Bank safeguards remained. The GoG replied to the Bank via letter dated August 30, 2011 requesting the use of credit proceeds to pay compensation to owners of the unfinished structures, one of the three groups of project affected people identified by the RAP consultants. At the Spring Meetings held in April 2012, the GoG communicated to Bank Management its decision to complete the acquisition of the Kwabenya landfill site and repeated its request to use credit proceeds to pay the compensation for the 76 inhabited structures identified in the draft RAP, while committing to pay for the land from its own funds. This was followed up with a letter sent to the Bank that provided the basis for calculating the compensation that amounted to US\$1,473,020 for the 76 structures.</p> <p>Bank Management authorized the use of credit proceeds to pay the above compensation and authorized a 7 month extension of the closing date, i.e. through December 31, 2012, in order to allow for the processing of payments in accordance with Bank safeguards. The DCA was amended to include the compensation payments and, as a condition of effectiveness, the GoG submitted an updated Kwabenya Plan for Compensation. This plan, which was updated by the RAP consultant, was reviewed and accepted as satisfactory by the Bank. In addition, a RAP consultant was retained by the GoG to facilitate the dissemination of information to affected people about compensation for lost assets and eligibility for compensation, and arrangements were put in place for payment of compensation and processing of grievances.</p> <p>By April 30, 2013, none of the structure owners had claimed their compensation. Although the Plan for Compensation to structure owners had been updated to take into consideration inflation and other factors, as required by the Bank, the Agyemankata Community sent an email to the Bank's Country Director for Ghana on June 7, indicating that: (i) the AMA and the National Security Authority forgot about inflation in the country; (ii) the AMA's inability to pay compensation to land owners forced the latter to continue to lease lands to survive; (iii) the Town and Country Planning allowed the installation of electric pylons on the land despite the fact that it had been acquired by means of the Executive Instrument; and (iv) the AMA needed to fulfill its obligations under the DCA with regard to compensation to land owners within the Project area.</p> <p>8. No longer required. As indicated above, the updated Kwabenya Plan for Compensation, which was found satisfactory by the Bank, was disseminated and discussed with the project affected people. The latter did not collect compensation, claiming that the amounts were inadequate in spite of having been updated. Since then, the GoG abandoned efforts to pay compensation or to remove occupants from their land and structures. The consultant responsible for completing the RAP and facilitating its implementation reported to the Bank task team leader that most project affected people indicated that they were not interested in receiving full compensation because they did not intend to vacate the land. In the meantime, construction of houses in the affected area resumed and accelerated, and the GoG took no apparent steps to halt this activity. The GoG advised the Bank by letter</p>

ISSUE	ACTION	IMPLEMENTATION PROGRESS
	<p>9. The consultants for the new EA will develop and undertake a consultation strategy that, at a minimum, fulfills the requirements of OP 4.01 for consultation on the scope of the EA and on the draft EA.</p> <p>10. Consultation on the scope of the EA will also serve as an initial consultation on the scope of the ISWMS for Accra.</p> <p>11. The EA will also be disclosed in accordance with the Bank's Policy on Disclosure.</p>	<p>on June 25, 2015 June 25, 2015 that the Ministry of Local Government and Rural Development has now advised that "the Executive Instrument be revoked and affected rights restored due to a number of factors, including encroachment and rapid pace of development at the proposed site."</p> <p>9. No longer required. The preparation of the EA was cancelled following the decision to abandon the development of the landfill.</p> <p>10. No longer required. The preparation of the EA was cancelled following the decision to abandon the development of the landfill.</p> <p>11. No longer required. The disclosure is not required since the EA was cancelled.</p>
Institutional Capacity	<p>12. Technical Assistance. Technical assistance is being provided to Metropolitan Assemblies (MAs) to develop and implement Information, Education and Communication (IEC) strategies as part of a broader communications program. This program includes: communications training for key staff of MAs, assistance in the development and production of communication materials for dissemination and the conduct of campaigns. In addition, a solid waste specialist is being incorporated into the Bank task team to visit all of the existing landfills and dumps in the five MAs at least twice a year to assess their operations, provide recommendations for improvement and monitor the outcomes.</p> <p>13. Operations and Maintenance Support. During the Mid-Term Review it was agreed to reallocate credit funds to increase disbursement category 4, which finances operating costs for sanitary landfills, refuse collection and others, so that MAs can cover their entire service area. In addition, to help address long-term needs, a</p>	<p>12. Completed. Technical Assistance has been provided to MAs for the development of IEC strategies, and campaigns are regularly conducted at the MAs. In addition, two workshops on solid waste management were organized for municipal officials with emphasis on the operation of landfills. The workshops were held in Takoradi and Kumasi in October 2011. The one in Takoradi was attended by officials and waste management staff from Accra, Takoradi and Tema and the one in Kumasi was attended by officials and staff from Kumasi and Tamale. A senior solid waste specialist joined the Bank task team in May 2009 and the following month visited the existing landfills in the Project cities plus other dump sites in Accra. Follow up missions took place in April 2010, October 2010 and January 2011 and old dump sites in the Project cities were capped by December 31, 2012. Extensive training will continue to be provided directly to the eleven metropolitan and municipal assemblies that constitute the GAMA and to the Environment, Health and Sanitation Department of the Ministry of Local Government and Rural Development with support from the GAMA Sanitation and Water Project.</p> <p>13. Completed. A workshop was organized under the auspices of the Minister of Local Governments and Rural Development for all of the Mayors in June 2009 and funds were reallocated to increase disbursement category 4, which finances operating costs for sanitary landfills, solid waste collection and management equipment and others.</p>

ISSUE	ACTION	IMPLEMENTATION PROGRESS
	<p>workshop will be held in 2009 for local waste management officials and civil society organizations.</p> <p>14. Social Accountability. The Bank is supporting the development of community score cards by the coalition of NGOs³ that works on sanitation in Ghana in order to promote awareness in the communities and social accountability with regard to landfill operations and solid waste management in general.</p> <p>15. Community Participation. The Bank is providing support for a competition on how to improve solid waste management through community and private sector participation in activities such as recycling, composting, energy recovery, information campaigns, etc. Cash awards will be available to support the implementation of the winning proposals. The publicity for this competition will also serve to create awareness in the communities.</p> <p>16. Education. Campaign on sanitation with IFAWAMI, which reaches 98 percent of the</p>	<p>14. Completed. The Bank sponsored a number of workshops and meetings with regard to the development of Citizen Report Cards by the coalition of NGOs working on Waste Management (CONWAM),⁴ beginning with a day-long workshop held on May 26, 2009. Proposals were prepared by CONWAM and CONIWAS⁵ in regard to expenditure tracking and social accountability in the provision of waste management and water services, respectively. The Bank formally announced the provision of grants to both CONWAM and CONIWAS at a ceremony held on October 9, 2009. In addition to working at the community level to educate people, CONIWAS and CONWAM briefed and obtained endorsement from key committees of the Ghanaian Parliament and local government officials on the social accountability exercise. In addition, a survey was completed in December 2009 for the entire AMA as part of a parallel Citizen Report Cards exercise on municipal services that included solid waste management. The dissemination of the results began in August 2010, when the Mayor presented an action plan to improve solid waste management that communities could track. The GAMA Sanitation and Water Project includes a subcomponent to support social accountability with regard to solid waste collection and management and other sanitation (liquid and septic sludge collection and treatment) and water services.</p> <p>15. Completed. A competition denominated Ghana Innovation Marketplace (GIM), supported by the GoG and the World Bank, was launched in the five largest cities of Ghana (UESP II cities) in June 2009. In addition to generating initiatives to improve waste management under the theme: "Solid Waste: Big Problem! Big Opportunity!" the competition served indirectly to promote behavioral change and community participation in waste management. A key highlight of the competition was the workshop held in Kumasi on November 11-12, 2009, organized by the Engineering Department of the University of Ghana and presided by the Minister of Local Government and Rural Development. By the competition closing date of November 30, 2009, a total of 142 entries had been received from the five major cities: Tamale, Kumasi, Sekondi-Takoradi, Tema, and Accra. The authors of the top 100 proposals received extensive training during March 2010 in order to convert the proposals into implementable business plans. The top 10 proposals were awarded cash prizes to help implement their business plans that covered different areas such as advocacy and education, value addition and improved solid waste collection. In view of the success of the GIM, a follow up competition will be supported by the GAMA Sanitation and Water Project.</p> <p>16. Completed. Bank staff participated in several educational radio programs and documentaries on waste management and environmental sanitation in general. Various religious organizations have continued to pursue this campaign.</p>

³ The former National Coalition of NGOs in Waste Management (NACONWAM), which has now been renamed CONWAM. The Bank's Vice President for the Africa Region launched this effort with the coalition and other civil society organizations in March 2009.

⁴ Formerly NACONWAM.

⁵ Coalition of NGOs in Water and Sanitation (CONIWAS).

ISSUE	ACTION	IMPLEMENTATION PROGRESS
	people in Ghana through churches, mosques and other religious centers.	
Social Impact Assessment and Mitigation Measures		
Finalization of the RAP	17. The RAP is being finalized. Depending on the outcome of the EA process, the RAP may need to be revised or, if the site is not found suitable, not implemented.	17. No longer required. As noted above, the GoG has indicated to the Bank by letter of June 25, 2015 a reversal of its previous position, stating that the Ministry of Local Government and Rural Development has now advised that “the Executive Instrument be revoked and affected rights restored due to a number of factors, including encroachment and rapid pace of development at the proposed site.”
Project Supervision		
Supervision	<p>18. A senior social safeguards specialist will continue to provide support to the Bank task team for RAP preparation and its eventual implementation.</p> <p>19. A lead environmental specialist will continue to provide support to the Bank task team during preparation of the EA and eventual implementation of the EMP.</p> <p>20. Formal Project supervision missions will be organized at least twice a year and progress on implementation of safeguards recommendations from the RAP and the EMP will be monitored and reported.</p>	<p>18. Completed. A senior social safeguards specialist has continued to provide support to the Bank team in Ghana.</p> <p>19. Completed. A lead environmental specialist was available to provide support to the Bank team in Ghana and particularly to the team’s senior environmental specialist who periodically supervised the Project.</p> <p>20. Completed. In addition to the supervision, the Bank has continued to organize safeguards workshops and other training events for Project implementation units on a regular basis.</p>
Assessing and Reporting Risks	21. The “Key Issues and Actions for Management Attention” section of the Implementation Status Report (ISR) will include a special section on the progress made in regard to Kwabenya.	21. Completed. A section on the Kwabenya subcomponent was included under key issues in the ISR.